

Wednesday, 8 November 2023

1
2 (10.00 am)
3 **MR STEVENS:** Good morning, sir, can you hear and see
4 me?
5 **SIR WYN WILLIAMS:** Yes, I can, thank you.
6 **MR STEVENS:** Thank you. If I may call
7 Mrs Williamson.
8 **TERESA MARY WILLIAMSON (affirmed)**
9 **Questioned by MR STEVENS**
10 **MR STEVENS:** Mrs Williamson, as you know, my name is
11 Sam Stevens and I ask questions on behalf of the
12 Inquiry. Can I ask you to state your full name,
13 please.
14 **A.** My name is Teresa Mary Williamson.
15 **Q.** In front of you there should be a bundle of
16 documents.
17 **A.** Yes.
18 **Q.** If I can ask you -- I think it's the smaller
19 bundle in this case -- to turn to that and you
20 should see in one of the first tabs a copy of
21 your witness statement?
22 **A.** That is correct.
23 **Q.** Thank you for giving that written statement to
24 the Inquiry and for giving oral evidence today.
25 Can I just check with you that that is

1

1 of your knowledge and belief?
2 **A.** Absolutely.
3 **Q.** For the purpose of the record, that statement is
4 WITN08680100. That statement now stands as your
5 evidence to the Inquiry. I am going to ask you
6 some questions about it. The first one is just
7 a point for clarification. You're now
8 Mrs Teresa Williamson.
9 **A.** Yes.
10 **Q.** At the time your last name was Berridge; is that
11 correct?
12 **A.** Yes, that's correct, that was my professional
13 name as a solicitor but I now use my married
14 name.
15 **Q.** Starting then, with your career history. You
16 qualified as a solicitor in 1990 --
17 **A.** That's correct.
18 **Q.** -- and on qualification you worked for
19 a solicitors firm practising criminal law?
20 **A.** Yes, I did.
21 **Q.** In your statement, you say that your caseload
22 was almost exclusively involved defending
23 individuals who had been accused of criminal
24 offences.
25 **A.** *(The witness nodded)*

3

1 a statement dated 15 August 2023 running to
2 36 pages?
3 **A.** Yes, the statement is 34 pages and then there's
4 two other pages of index.
5 **Q.** Yes. On page 34 there should be your signature?
6 **A.** Yes.
7 **Q.** Are the contents of that statement true to the
8 best of your knowledge and belief?
9 **A.** There's just one thing I do wish to correct.
10 **Q.** Yes?
11 **A.** When I was reading the statements and exhibits
12 last night, I realised that the person who
13 actually made the decision on prosecution, there
14 was one for each business and I think it was the
15 person called the National Investigation Officer
16 for the Post Office Limited. In the past, it
17 had been the Retail or the Area Managers but, by
18 the time, I think, this case was being dealt
19 with, I think there was one person making the
20 decisions on prosecutions within each business,
21 so I think that was not quite correct when
22 I made that statement, but I just misremembered
23 that.
24 **Q.** I see. So, subject to that correction, the
25 remainder of the statement is true to the best

2

1 **Q.** You go on to say that you had a very small
2 number of private prosecutions relating to
3 obvious dogs.
4 **A.** Yes.
5 **Q.** In terms of private prosecutions, when you say
6 a very small number, how many are we talking:
7 less than ten, fewer than ten?
8 **A.** Yeah, fewer than ten. It's one or two, I think.
9 **Q.** When you were prosecuting those cases, did you
10 advise on charging decisions?
11 **A.** Yes.
12 **Q.** When you were advising on charging decisions,
13 would you apply the Code for Crown Prosecutors?
14 **A.** Those were completely private prosecutions.
15 I must admit, I don't think I did, when I was
16 doing those private prosecutions, apply the Code
17 for Crown Prosecutors. But all the cases
18 I dealt with at Royal Mail as a prosecutor,
19 I did apply the Code for Crown Prosecutors, yes.
20 **Q.** We'll come to that now. You joined the Post
21 Office in 1992?
22 **A.** Yes.
23 **Q.** So two years after qualifying?
24 **A.** Yes.
25 **Q.** You say that your role involved prosecuting

4

1 cases. Was the prosecution of criminal cases
 2 your soul area of responsibility or did you have
 3 other casework as well?
 4 **A.** I did a little bit of advice work, yes.
 5 **Q.** Advising on what matters?
 6 **A.** Like criminal type issues, yes.
 7 **Q.** So very much within the Criminal Law Team and
 8 focused on criminal practice?
 9 **A.** Yes.
 10 **Q.** You say in your statement that, at the time of
 11 joining, there were around ten lawyers in the
 12 Criminal Law Team. Of those, how many would be
 13 working on prosecutions against subpostmasters
 14 for theft, false accounting or similar offences?
 15 **A.** When I first started working at the Post Office,
 16 all lawyers in the Criminal Law Team, apart from
 17 the Assistant Director, later called the Head of
 18 the Department, the team leader, everyone would
 19 prosecute a mixture of cases. So some would be
 20 Royal Mail cases, some Post Office Limited cases
 21 and some might be Parcelforce or cash handling
 22 and distribution. So it was a real mix at the
 23 beginning, although later I think it changed to
 24 people tended to do more of one kind of case.
 25 **Q.** When you said everyone except what became the

5

1 **Q.** -- in '95/'96?
 2 **A.** Yeah.
 3 **Q.** Roughly how many lawyers and senior lawyers were
 4 there as a proportion within the team?
 5 **A.** So when I first joined the Criminal Law Team
 6 I think I was the only lawyer. Everybody else
 7 was a senior lawyer. And then when I became
 8 a senior lawyer, from time to time I think we
 9 did have article clerks came and joined us in
 10 the team and, at some stage, also, there was
 11 a junior lawyer came and joined us in the team.
 12 But, sorry, I can't remember the dates.
 13 **Q.** In terms of the title "senior lawyer" did that
 14 simply reflect that you'd been at the business
 15 for a period of time or was it a substantive
 16 promotion?
 17 **A.** It was a substantive promotion. I remember
 18 that, in the run-up to me becoming a senior
 19 lawyer, I was purposely given cases, more
 20 challenging cases, so that I could prove that
 21 I could deal with more challenging cases on my
 22 own.
 23 **Q.** When you say more challenging cases, can you
 24 recall what type of challenging -- or why they
 25 were more challenging?

7

1 team leader --
 2 **A.** Yeah.
 3 **Q.** -- when you joined, you were referring there to
 4 Roger Williams?
 5 **A.** No, I think I was about Mike Heath, who was the
 6 Assistant Director, the head of the Criminal Law
 7 Team.
 8 **Q.** So do you recall what Roger Williams' job title
 9 was?
 10 **A.** So he was the principal lawyer and, yeah,
 11 I think when I first joined, he was doing
 12 a mixture of cases, yes.
 13 **Q.** Mike Heath, you said -- sorry, could you just
 14 repeat his job title?
 15 **A.** Mike Heath was the assistant director and he
 16 oversaw, he managed the team. I don't know
 17 whether he had any of his own caseload. He
 18 might have had the more serious cases but
 19 I think more managerial role, and higher level
 20 advice work on criminal law.
 21 **Q.** When you joined, your job title was lawyer.
 22 **A.** Yes.
 23 **Q.** You became senior lawyer or promoted to senior
 24 lawyer --
 25 **A.** Yes.

6

1 **A.** I guess either because there was more paperwork
 2 or because financially there was more involved.
 3 So one case I particularly remember was a case
 4 where I think 500,000 was involved, but that was
 5 more of a Royal Mail case. It was someone
 6 trying to undercut the -- sort of like the Royal
 7 Mail and the universal service provision, so
 8 it's a more complicated case and I remember
 9 dealing with that in the run-up to becoming
 10 a senior lawyer. That's a case that --
 11 evidencing that could deal with more.
 12 **Q.** So in terms of your line management, you say you
 13 reported into Roger Williams initially --
 14 **A.** Initially.
 15 **Q.** -- and then that became Rob Wilson later?
 16 **A.** Yes.
 17 **Q.** Did Roger Williams and/or Rob Wilson report into
 18 Mike Heath?
 19 **A.** They did and, in fact, many ways we all reported
 20 in to Mike Heath but they would have been the
 21 people who would have done, say, for example, my
 22 appraisal, they would have been the people that
 23 I went to first if I had any issues in cases.
 24 **Q.** Can you recall to whom Mike Heath reported?
 25 **A.** So initially he reported to -- well, he did --

8

1 or the way throughout -- reporting to "the
 2 solicitor" to the Post Office, and when I first
 3 joined it was a man and, I'm really sorry,
 4 I can't remember his name. But, after a period
 5 of time, it was a woman called Catherine
 6 Churchard.

7 **Q.** To what extent did the solicitor to the Post
 8 Office have involvement with the day-to-day
 9 running of the Criminal Law Team?

10 **A.** So Catherine Churchard?

11 **Q.** Yes.

12 **A.** Very little. It was Mike Heath who was in
 13 charge of his team. You really only had
 14 dealings with Catherine Churchard -- in fact,
 15 actually nice dealings, I remember when I got
 16 pregnant I got a present, but I didn't really
 17 have much dealings with her at all.

18 **Q.** When you were promoted to be a senior lawyer in
 19 '95 or '96, you say at that stage the level of
 20 supervision over your work would have been
 21 minimal?

22 **A.** Yes.

23 **Q.** Can you expand on that: to what extent was it
 24 supervised?

25 **A.** When files came in from the Investigators, they

9

1 in the team, a senior lawyer in the team, yes.

2 **Q.** So we know that '95/'96, you said beforehand
 3 that they started -- you had a variety of work
 4 of all different types of cases.

5 **A.** Mm.

6 **Q.** By '95/'96, were you noticing that you were
 7 getting more of a particular type of case and,
 8 if so, what type?

9 **A.** So not so much '95/'96. '95/'96, I think it was
 10 still a wide variety of cases but it was after
 11 I returned from maternity leave. Later on,
 12 I can't remember exactly when it happened, that
 13 we got more restricted cases, more towards the
 14 2000s, I think.

15 **Q.** When you say more restricted with the cases,
 16 what type of cases were you getting more
 17 regularly at that point?

18 **A.** I think -- I can't remember which cases I was
 19 mainly allocated to but I think I did get a fair
 20 few Post Office Limited cases, yes.

21 **Q.** How regularly would you have a case against
 22 a subpostmaster for charges of theft or false
 23 accounting?

24 **A.** And that's something I really can't remember.
 25 I really cannot remember the number of the cases

11

1 always went through the desk of the team leader
 2 or had been the Assistant Director, and he would
 3 have allocated cases or, if he had wanted to --
 4 I don't know whether he did or not, whether he
 5 had ever had a look in cases just to see things
 6 were going properly.

7 **Q.** You say at that time you took over a supervisory
 8 role. How many people did you supervise?

9 **A.** In total, three: two trainee solicitors, article
 10 clerks and one junior lawyer, but at different
 11 times.

12 **Q.** The article clerks and the junior solicitors,
 13 would they have their on caseload?

14 **A.** Yes. Well, I don't think the article clerks
 15 did. The junior lawyer did but I don't think
 16 the article clerk did. I think she worked more
 17 like one of the junior legal executives helping
 18 with more administrative things or doing
 19 specific tasks on the case.

20 **Q.** Would a junior lawyer ever, for example, give
 21 charging advice independently without
 22 supervision by you?

23 **A.** So the junior lawyer, if I'd been supervising
 24 them at the time and I hadn't been there, they
 25 would have had to run it through another lawyer

10

1 I had, the names of the defendants or the issues
 2 in the cases. I can only comment on what I've
 3 seen. It's just so long ago.

4 **Q.** Well, we are going to, in due course, turn to
 5 look at one of those. But, before we do, a few
 6 more general questions. You refer in your
 7 statement to there being a slight reduction in
 8 staff numbers.

9 **A.** Mm.

10 **Q.** We refer to ten lawyers at the start and
 11 I think, by the time you left, that you say
 12 roughly eight lawyers?

13 **A.** Yeah.

14 **Q.** So are we talking simply a reduction of two
 15 or --

16 **A.** In fact, when I was thinking about it last night
 17 I was trying to remember the order in which
 18 people left. So there were two rounds of
 19 redundancies. I think at the first round of
 20 redundancies Mike Heath left. I think also --
 21 I can't remember whether both Joyce Gibson and
 22 Nicola Knight went or whether they went on two
 23 separate redundancy rounds. Tony Brentnall
 24 retired and went to Canada.

25 But I can't remember quite the order that

12

1 people left and whether some people left after
 2 I joined the Employment Team, but all I can say,
 3 it did reduce, but I can't remember the numbers
 4 and when.

5 **Q.** A reduction in numbers over time. Do you recall
 6 whether the amount of work that the Criminal Law
 7 Team were expected to deal with, whether that
 8 increased or decreased over the same period?

9 **A.** To me, it felt about the same.

10 **Q.** Are you aware as to whether the size of the
 11 Investigative Team in the Security Department,
 12 whether that grew or shrank at the same time?

13 **A.** They also had a round of redundancies so it was
 14 voluntary redundancies and I think a fair few
 15 investigators went on the first round of
 16 voluntary redundancies, yes. So it was a --
 17 I get -- I seem to recall that both the Criminal
 18 Law Team and the Investigations Team were
 19 shrinking, and the business was happy with that.

20 **Q.** I want to just briefly look at the working
 21 environment. In your statement -- we don't need
 22 to go there but, for the record, it's firstly
 23 paragraph 18 -- you say:

24 "Aside from supervision of the article
 25 clerk and more junior lawyer, each member of the

1 you wanted to appear that you could deal with
 2 your own cases and didn't have to keep asking
 3 for help. It just wasn't a collaborative team
 4 and the reason I say that, when I moved to the
 5 Employment Law Team, it was much more
 6 collaborative.

7 **Q.** For example, in, say, the Criminal Law Team and
 8 say there's number of people prosecuting
 9 subpostmasters for, let's just say theft in this
 10 case, and let's focus after Horizon --

11 **A.** Mm, did you say after Horizon?

12 **Q.** After Horizon, yes.

13 **A.** Okay.

14 **Q.** The source of evidence is very similar, in that
 15 it comes from the same computer system.

16 **A.** Mm.

17 **Q.** The ways of working and the practices are
 18 similar or the same, should be the same --

19 **A.** Mm-hm.

20 **Q.** -- because it's in the same company. To what
 21 extent do you think it's surprising that, when
 22 there were those similarities, people didn't
 23 communicate or discuss how they approached other
 24 cases to try to share learning?

25 **A.** It is surprising but that's how it was.

1 team tended to work autonomously on their cases
 2 and there was generally very little
 3 collaboration."

4 You go on to say at paragraph 13 of your
 5 statement that the team regularly went for lunch
 6 together but that was to have social
 7 conversations --

8 **A.** Mm.

9 **Q.** -- not to talk about the cases. So this doesn't
 10 sound like it was a case of a personality clash
 11 within the department; is that fair?

12 **A.** Yeah.

13 **Q.** You hesitated to answer?

14 **A.** Yeah, I did hesitate, didn't I? I don't think
 15 I was the most popular person in the team. I'll
 16 accept that.

17 **Q.** So when you say people working autonomously, was
 18 that that you didn't speak to other people about
 19 your cases: were you aware of other people
 20 speaking about their cases to each other within
 21 the department?

22 **A.** Not really. I mean, I do recall that it was all
 23 very autonomous and I guess partly because we
 24 were dealing with different cases. I think also
 25 because I think, once you are a senior lawyer,

1 **Q.** Do you know why?

2 **A.** Do I know why? It was just the nature of the
 3 organisation, I think.

4 **Q.** Do you think that was caused by the way you were
 5 managed?

6 **A.** Possibly.

7 **Q.** How would you describe the management style
 8 of -- well, let's start with Mr Heath.

9 **A.** Mm.

10 **Q.** How would you describe his management style?

11 **A.** He was a lot more collaborative. You really
 12 felt that you could go in and ask him anything.

13 **Q.** Who took over from Mr Heath?

14 **A.** Rob Wilson.

15 **Q.** Rob Wilson?

16 **A.** Yeah.

17 **Q.** How did things change when Rob Wilson took over?

18 **A.** He was a quieter, more private, more reserved
 19 person. It didn't feel quite so much an open
 20 door to go into his office.

21 **Q.** Do you think that more broadly affected the
 22 level of collaboration within the team or not?

23 **A.** Certainly as far as I was concerned, yes.

24 **Q.** On reflection, do you think it would have been
 25 helpful if the team had been more collaborative

1 or --

2 **A.** Absolutely.

3 **Q.** Why?

4 **A.** Well, I've worked in other organisations and
5 I've been a more senior leader in other
6 organisations and I realise that collaboration
7 and facilitation adds to the strength of a team,
8 and you can achieve far more when you
9 collaborate. But that's with the benefit of
10 hindsight, looking back to how things were.

11 **Q.** We're talking here purely within the Criminal
12 Law Team, to what extent were you aware, within
13 Post Office, of any sources of advice or support
14 for IT issues?

15 **A.** So, what, if we had IT problems ourselves?

16 **Q.** Let me rephrase that. If a case threw up
17 an issue with the a computer error or an IT
18 issue, were there any resources of which you
19 were aware in the Post Office itself that you
20 could use for assistance or to discuss the
21 matter with?

22 **A.** Okay, so if it had come up in one of my Post
23 Office cases, I'd have gone back to the
24 Investigator and asked him to get a statement
25 from the relevant person, yes.

17

1 **Q.** -- and to act with independence and integrity?

2 **A.** Absolutely.

3 **Q.** To what extent, if at all, did you find it was
4 more difficult to comply with those duties as
5 an in-house solicitor?

6 **A.** I thought it was easier, actually. It's very
7 hard as a defence solicitor sometimes, when
8 clients were trying to get you to -- they might
9 tell you one thing and then they wanted to put
10 forward a different case. In some ways, it was
11 much more challenging as a defence solicitor
12 because I trusted that, within the Post Office,
13 if I ask for evidence to be obtained, that it
14 would be obtained. I trusted that if there was
15 unused material to be disclosed, that that would
16 be provided to me by the Investigator.

17 So I thought, at the time, until I read the
18 article in the *Computer Weekly*, that it was
19 easier.

20 **Q.** Well, let's just go out of order a bit because
21 you've raised this. You say that's what you
22 thought at the time?

23 **A.** Yeah.

24 **Q.** What are your reflections now?

25 **A.** Looking back, knowing what I know now since

19

1 **Q.** So you would have left that for the Investigator
2 and you yourself wouldn't have approached --

3 **A.** Absolutely because it was the Investigators who
4 gathered the evidence, and then the Criminal Law
5 Team advised on the evidence, and then the
6 National Investigation Manager made the final
7 decision on whether there should be
8 a prosecutor. So there was a very clear
9 delineation between who did what.

10 **Q.** I want to move now to look at the slight
11 difference in role you had because before you
12 were in private practice in a solicitor's
13 firm --

14 **A.** Yeah.

15 **Q.** -- and one thing is you went from mostly defence
16 to solely prosecution?

17 **A.** Yeah.

18 **Q.** Secondly, you became an in-house solicitor --

19 **A.** Yeah.

20 **Q.** -- where your employer was also your client?

21 **A.** Yeah.

22 **Q.** Presumably as an in-house solicitor, you
23 accepted you still had your ordinary duties to
24 the court --

25 **A.** 100 per cent, yes.

18

1 I read the article in *Computer Weekly* and also
2 reading the judgments in the *Bates* case and the
3 *Hamilton* case, I realise that there was a lot of
4 material that wasn't disclosed to me and things
5 that I should have known about I didn't know
6 about. And that makes me angry and sad.

7 **Q.** Can you explain why that makes you angry?

8 **A.** Because we should have been told these things.
9 So, for example, I understand there were
10 discussions at board level about the reliability
11 of the Horizon system, and that was not filtered
12 down to the Criminal Law Team.

13 **Q.** If it had been filtered down, speaking purely
14 for yourself, what do you think you would have
15 done differently?

16 **A.** Well, if I'd known that the system was not
17 operating properly, I would have insisted that
18 the relevant statements were obtained from
19 Fujitsu to explain how the system, what was
20 working, or if it wasn't working properly, in
21 what respects it wasn't working properly.

22 **Q.** That statement, would you have done anything in
23 respect of documentation?

24 **A.** In what sense?

25 **Q.** Sorry, so you would have obtained statements

20

1 from Fujitsu. Would you have looked for any or
 2 asked the investigators to look for any further
 3 documents relating --
 4 **A.** Absolutely, yes. Definitely.
 5 **Q.** Did you ever feel at any point under pressure
 6 from Investigators to pursue a prosecution?
 7 **A.** The main one I can think of was a case prior to
 8 Horizon where there was an issue in relation to
 9 unused material, and I sent off the Investigator
 10 to go and search a big warehouse looking for
 11 paid orders. There was pushback from him in
 12 that case and, in fact, we did actually have to
 13 withdraw that case. So that's the case that
 14 I remember where there was the biggest pushback
 15 but that's a pre-Horizon case.
 16 **Q.** From what you said, that was withdrawn, that
 17 case?
 18 **A.** That case had to be withdrawn and, if I'd ever
 19 had any Horizon cases where there was that sort
 20 of issue, where I felt there was unused material
 21 available that was not being disclosed and there
 22 was either a refusal to disclose it or I was
 23 being told it couldn't be found and they weren't
 24 going to withdraw the case, I wouldn't have
 25 stood for that.

21

1 **A.** Gosh, I've got to -- what type of case are you
 2 talking about? There were so many different
 3 types of cases.
 4 **Q.** If it was a subpostmaster who is alleged to have
 5 stolen cash from the Post Office, a similar case
 6 to *R v Brennan*, which we'll come to shortly,
 7 that type of case.
 8 **A.** Okay. So I guess the starting point would
 9 probably be -- usually it's an audit had taken
 10 place at the sub post office or the branch post
 11 office -- and I am really trying to remember
 12 a long way back now. It's really hard to
 13 remember. There would often be paperwork,
 14 statements and exhibits from the DSS Paid Order
 15 Unit in Lisahally; there would be statements
 16 from the officers, the Investigating Officers;
 17 there would be the record of tape recorded
 18 interview; if the person had voluntarily agreed
 19 to be searched, whether anything had been found
 20 on them; if anything had been found anywhere in
 21 the office in an untoward place.
 22 **Q.** In terms of accounting records?
 23 **A.** Oh, accounting records.
 24 **Q.** The cash account by the --
 25 **A.** Yeah, there'd be a cash account from the -- for

23

1 **Q.** Staying on the subject of acting as an in-house
 2 solicitor, I want to talk about instructions.
 3 That phrase can be used in two ways. Firstly,
 4 a lay client can give instructions to
 5 a solicitor and, secondly, a solicitor can pass
 6 on those instructions to counsel?
 7 **A.** Yeah.
 8 **Q.** As a solicitor in the Criminal Law Team, did you
 9 ever provide instructions to act where you made
 10 the decision on the behalf of the Post Office as
 11 a lay client?
 12 **A.** No.
 13 **Q.** We've already covered in your evidence,
 14 actually, who made the charging decisions, so
 15 I don't need to take you to there. We can move
 16 on instead to some of the processes. When you
 17 joined, and focusing purely on cases against
 18 subpostmasters here for theft and false
 19 accounting, obviously when you joined, such
 20 cases wouldn't have relied on Horizon data
 21 because that didn't come until later.
 22 **A.** Yeah.
 23 **Q.** Can you just summarise briefly what accounting
 24 data was used in those cases prior to the
 25 introduction of Horizon?

22

1 the sub post office, and with the -- the
 2 documents that used to get sent off to Paid
 3 Order Unit in Lisahally, I'm trying to remember
 4 what kind of documentation went with it.
 5 I can't remember the name of the form but I'm
 6 sure there was a form, probably a handwritten
 7 form that went with the documents to Lisahally.
 8 **Q.** To what extent did the investigation focus on,
 9 pre-Horizon, trying to establish where alleged
 10 stolen funds had gone, so whether to the
 11 subpostmaster or otherwise?
 12 **A.** Well, I think in all cases, pre and post,
 13 there'd be -- if the -- the problem was that
 14 people couldn't be searched unless the police were
 15 involved, unless they voluntarily agreed to. So
 16 if they voluntarily agreed to be searched or the
 17 police were involved, the person might be
 18 searched, also their handbag or something like
 19 that. There was often questions asked about
 20 their accounts, their bank accounts, or things
 21 like that. It just depended on the case. It's
 22 such a general question, it's really hard to
 23 answer.
 24 **Q.** Let me ask one last general question though,
 25 which may be hard to answer but we'll see.

24

1 Before the implementation of Horizon, if
 2 a discrepancy had been identified leading to
 3 an investigation, can you recall to what extent,
 4 if at all, or with what regularity,
 5 subpostmasters would say that any alleged
 6 discrepancy wasn't due to dishonesty but due to
 7 errors in the accounting documentation?
 8 **A.** I think it happened before Horizon and it
 9 happened after Horizon.
 10 **Q.** Do you recall if there was a change in frequency
 11 of those issues being raised?
 12 **A.** No, I can't recall.
 13 **Q.** Can we turn to your witness statement, please.
 14 It's page 7, paragraph 19 -- sorry, the wrong
 15 page.
 16 Page 6 -- thank you -- paragraph 19, you set
 17 out or summarise ten steps that you say were
 18 typically involved in a prosecution -- or your
 19 involvement, I should say, sorry. The first is
 20 reviewing the case file, and the final sentence
 21 says:
 22 "On reviewing the file, my focus would have
 23 been on considering the strength of the evidence
 24 in the case in accordance with the evidential
 25 test in the Code for Crown Prosecutors which was
 26
 27

1 **A.** Yes.
 2 **Q.** But you drafted the opinion on why a prosecution
 3 is or is not appropriate in accordance with the
 4 Code for Crown Prosecutors, with a particular
 5 focus on whether there is a realistic prospect
 6 of conviction.
 7 **A.** Mm.
 8 **Q.** Why was there a particular focus on that aspect,
 9 on the first stage?
 10 **A.** Because, if the criminal lawyer didn't advise
 11 there was sufficient evidence to afford
 12 a realistic prospect of conviction, unless
 13 further evidence was obtained, the case would
 14 fall, then it wouldn't go any further.
 15 **Q.** You say:
 16 "If I advised that there was a realistic
 17 prospect of conviction, I would have also
 18 included my opinion on the likelihood of success
 19 in this advice, along with the relevant charges
 20 and a summary of facts to be served on the
 21 defence. If I advised that there was not
 22 a reasonable prospect of conviction, the case
 23 would have been brought to a close at this
 24 stage."
 25 You say you were only providing an opinion.
 26
 27

1 used by the Criminal Team to assess whether
 2 a case met the threshold or prosecution or not."
 3 **A.** Mm.
 4 **Q.** Do you recall what, if any, guidance there was
 5 available to you when you joined the Post Office
 6 on applying the Code for Crown Prosecutors?
 7 **A.** I just remember that we always applied the Code
 8 for Crown Prosecutors and we all had a copy of
 9 the Code for Crown Prosecutors, and I always
 10 used it when I was thinking about cases.
 11 **Q.** What was your understanding of the evidential
 12 stage of the Full Code Test?
 13 **A.** Right. So the starting point: is there
 14 sufficient evidence to afford a realistic
 15 prospect of conviction? So that is whether
 16 there'd be more than a 50 per cent chance of
 17 success, so there'd be enough evidence on each
 18 of the individual aspects of a crime, so the
 19 *actus reus* and the *mens rea*, to afford
 20 a realistic prospect of conviction.
 21 **Q.** Could we turn the page now, please, to step 3
 22 and this is where you're talking about drafting
 23 a written advice to a Regional or Area Manager.
 24 We spoke on how that may be someone different at
 25 different points.
 26
 27

1 **A.** Mm.
 2 **Q.** To what extent would you have offered an opinion
 3 on the public interest aspect of the test?
 4 **A.** So that came second. So there were -- so, first
 5 of all, we'd advise whether there's sufficient
 6 evidence to afford a realistic prospect of
 7 conviction. Then, if there was sufficient
 8 evidence to afford a realistic prospect of
 9 conviction, you would possibly advise on the
 10 likelihood of success. So whether there was
 11 a low prospect of success, so more than
 12 50 per cent but not particularly high, or
 13 a moderate or a high prospect of success.
 14 And then, in relevant cases, say for
 15 example, you know, maybe it was a really old
 16 accused person who was maybe, I don't know, 85,
 17 something like that, and it was a maybe a small
 18 amount that had been stolen, then you might be
 19 advising whether it was in the public interest
 20 to prosecute such an old person, or if it's
 21 a very young person who maybe was working as
 22 an assistant -- or maybe a young postman, maybe,
 23 who had stolen some mail but maybe they'd only
 24 stolen one letter and they were very young,
 25 they'd only just started, again, that might be
 26
 27

1 in the public interest for not prosecuting.

2 **Q.** It sounds like there what you're describing is

3 you would proffer advice if it appeared, on the

4 face of the case, that there were --

5 **A.** Yeah.

6 **Q.** -- countervailing factors --

7 **A.** Yeah.

8 **Q.** -- that suggested that a prosecution wasn't in

9 the public interest?

10 **A.** Yes.

11 **Q.** So was the default position that you wouldn't

12 advise on the public interest unless, on the

13 face of the case, there was such countervailing

14 factors?

15 **A.** Yes, I think that's correct, yes.

16 **Q.** In the case of a subpostmaster accused

17 dishonesty, of theft, what, aside from the

18 factors you set out there, were there any others

19 that you may take into consideration which would

20 tend or point away from a prosecution in the

21 public interest?

22 **A.** I think I would often, if it's one where I felt

23 a bit uncomfortable about recommending

24 prosecution, I would read through the Code for

25 Crown Prosecutors and see whether there were any

29

1 smaller -- no, sorry the larger bundle at E4, it

2 would be right at the back of that. I think the

3 last document within it.

4 **A.** Thank you. That's better. Right:

5 "There is no single statement of current

6 policy ..."

7 *(The witness read to herself)*

8 My reading of that is that the Code for

9 Crown Prosecutors is still overarching. So if

10 there was insufficient evidence to afford

11 a realistic prospect of conviction it wouldn't

12 be prosecuted. It was only if there was

13 sufficient evidence to afford a realistic

14 prospect of conviction, then you were moving

15 onto the next stage, would you look at this.

16 So I -- because this is a document not

17 written by a lawyer; this is a document written

18 by the Head of Investigations, Andrew Wilson,

19 who is not a lawyer. So he's not articulating

20 the Code for Crown Prosecutors, but I would

21 always have read this through the lens of the

22 Code for Crown Prosecutors. So that would, in

23 effect, trump this document.

24 **Q.** Do you think the way you worked --

25 **A.** Yes.

31

1 factors discussed there that might tend away

2 from recommending a prosecution.

3 **Q.** To what extent -- just trying to clarify this

4 point on the prospects of success, of say one

5 that's 55 per cent and one that's 70 per cent,

6 to what extent did the variation in prospect of

7 success there factor in to the public interest

8 stage of the test, as you applied it?

9 **A.** Less so.

10 **Q.** Please can we bring up a document. It's

11 POL00030659.

12 It's a document titled "Post Office Internal

13 Prosecution Policy (Dishonesty)", and it's dated

14 December 1997. Under heading 2, it says:

15 "There is no single statement of current

16 policy but it can be summed up as normally to

17 prosecute all breaches of the criminal law by

18 employees which affect the Post Office and which

19 involve dishonesty."

20 Was that a fair reflection of -- do you

21 think that's an accurate reflection of what the

22 policy was up to December '97?

23 **A.** I'm struggling to read with the glare. Can you

24 point me to the paper version, please?

25 **Q.** Of course, yes. It should be in the bundle, the

30

1 **Q.** -- do you know if that's similar to how other

2 people in the team worked or not?

3 **A.** I think when I was there in 2002/2003, that

4 would have been the way people would have worked

5 and, if they didn't, I'd have been shocked and

6 disappointed with them.

7 **Q.** The point that there was no single statement of

8 current policy before, was it -- from your

9 evidence, is it that -- the sort of single

10 policy, in practice, was simply to apply the

11 Code for Crown Prosecutors?

12 **A.** Certainly in the Criminal Law Team, when we were

13 advising on the evidence, it would have been to

14 apply the Code for Crown Prosecutors. This

15 document, I think -- I'm not quite sure who the

16 audience for the document was meant to be but my

17 reading of it was that it was almost like trying

18 to find more cases where the public interest

19 would have applied, so it's more about not

20 prosecuting everybody.

21 So, for example about -- there's a lot of

22 talk about Royal Mail cases and wilful delay.

23 I think it's much more aimed at that and having

24 fewer prosecutions rather than more

25 prosecutions.

32

1 Q. Do you have any recollection of what led to this
2 policy being --

3 A. No, that's what I don't know so I don't know why
4 it was drafted. Because it's a Security and
5 Investigations Team document, Andrew Wilson.
6 I know he says that lawyers have reviewed it.
7 I suspect that would have been Mike Heath, the
8 Assistant Director. But I don't know who the
9 target audience was for but I don't think the
10 target audience was necessarily so much lawyers
11 as people within the business. Maybe, I don't
12 know, possibly, the people making the decision
13 whether to prosecute or not. But I don't know.
14 I'm guessing.

15 Q. As I say, for the purposes of your practice, you
16 were led by the Code for Crown Prosecutors?

17 A. Absolutely. That came first, always.

18 Q. Your evidence earlier was that you didn't speak
19 much about practice with -- or collaborate with
20 other people so whilst you don't -- you've no
21 reason to believe that other prosecutors --
22 sorry, I'll rephrase that -- other lawyers in
23 the Criminal Law Team used this document rather
24 than the Code, you don't have firsthand
25 knowledge of that?

33

1 prepared by the subpostmaster --

2 A. *(The witness nodded)*

3 Q. -- and the record of transactions, so the data
4 from which the cash account was drawn, that was
5 created and kept by the subpostmaster as well;
6 do you agree with that?

7 A. Or, say, for example, if it was in the branch
8 office, different people might have prepared
9 different bits of it. I think that's what
10 happened in -- no, that's a Horizon case, no.
11 But it might have been assistants prepared
12 certain transaction records, yeah.

13 Q. Yeah, but for a subpostmaster in an agency
14 branch --

15 A. On their own.

16 Q. -- on their own, they maintain a record of
17 transactions and they're responsible for
18 creating the accounting documents?

19 A. Yes.

20 Q. So if there's any queries about the integrity of
21 the record of transactions or how the cash
22 account was put together -- I appreciate there's
23 the privilege against self-incrimination, but
24 question -- the subpostmaster could be asked
25 questions about how the transactions were kept

35

1 A. I don't have firsthand knowledge and that
2 doesn't sound right. You know, it was always
3 the Code for Crown Prosecutors came first and we
4 all had copies of it. So I can't see why that,
5 in anyone's mind, would trump the Code for Crown
6 Prosecutors.

7 Q. That document can come down, thank you.
8 Moving, then, to the introduction of
9 Horizon, you say in your statement that you
10 likely became aware of Horizon as something has
11 been introduced in either the late '90s or early
12 2000s.

13 A. Mm-hm.

14 Q. You say you didn't give it a lot of thought at
15 the time and you also say that -- we don't need
16 to go there but at page 12, at the top of your
17 statement, you say:
18 "I knew it was a computerised bookkeeping
19 system designed to assist subpostmasters with
20 the processing of various payments and also
21 balancing on a weekly basis."
22 That broad understanding, can you recall
23 where that came from?

24 A. Sorry, no.

25 Q. Previously, the cash account before Horizon was

34

1 and how the cash account was created?

2 A. Yes.

3 Q. With Horizon, Horizon stored the transactions
4 itself --

5 A. Yes.

6 Q. -- and Horizon created the new cash account?

7 A. Yes.

8 Q. So do you accept that the provenance of the
9 data, the accounting data upon which
10 prosecutions against subpostmasters for theft,
11 the provenance of the data on which those were
12 based, fundamentally changed with the
13 introduction of Horizon?

14 A. Yes.

15 Q. The integrity of that data depended on the
16 computer or Horizon rather than the
17 subpostmaster?

18 A. *(The witness nodded)*
19 I'm not answering, I'm thinking. Could you
20 ask me the question again because my
21 concentration has gone.

22 Q. The integrity of the data depended on the
23 computer, namely Horizon, rather than how the
24 SPM stored the records or totted up the account?

25 A. Yes.

36

1 Q. So with that substantial change, do you recall
 2 any discussion within the Criminal Law Team
 3 about how the introduction of Horizon would
 4 affect prosecutions to subpostmasters when
 5 Horizon was introduced?
 6 A. There probably was but I cannot remember any
 7 specifics.
 8 Q. As a lawyer, had you worked -- prior to Horizon,
 9 had you worked on any cases which involved
 10 relying on data produced by a computer to prove
 11 a fact?
 12 A. I remember a defence case where I had, involving
 13 a bookie -- bookies.
 14 Q. So do you recall now the terms of the now
 15 repealed Section 69 of the Police and Criminal
 16 Evidence Act?
 17 A. Please remind me. It's a long time ago.
 18 Q. So Section 69 -- I'm paraphrasing here, but set
 19 out that, in order for a document produced by
 20 a computer to be admitted as evidence of a fact
 21 stated therein, the prosecution had to prove,
 22 amongst other things, that there were no
 23 reasonable grounds for believing that the
 24 statement was inaccurate because of improper use
 25 of the computer, or that at all material times

1 "I recall that at the time the system was
 2 being rolled out, there was a general message
 3 within the organisation that it was
 4 a sophisticated and high-quality technology."
 5 Do you remember where that message came
 6 from?
 7 A. No.
 8 Q. The Inquiry has heard a significant amount of
 9 evidence about the difficulties faced in the
 10 rollout of the Horizon IT System from 1999 and
 11 2000 and onwards. Were you aware of any of
 12 those difficulties?
 13 A. No.
 14 Q. You say in your statement that you always
 15 assumed that Horizon was reliable and was never
 16 given any reason to doubt the accuracy of the
 17 technology. You say, paragraph 28:
 18 "I did not ever think to question the
 19 accuracy of the technology to properly
 20 understand the mechanics of the system."
 21 What was the basis for your reassurance,
 22 your assurance that the system was accurate?
 23 A. I can't remember now. I guess because
 24 I personally don't think I'd had any cases where
 25 there were any issues with the system working

1 the computer was operating properly --
 2 A. Mm.
 3 Q. -- or there was another exception for it, if it
 4 wasn't operating properly. Were you aware that
 5 the Post Office made submissions to the Law
 6 Commission on the proposal to repeal Section 69?
 7 A. When was that? What year?
 8 Q. It would have been in the -- I think it's -- the
 9 late '90s and I'll get a specific date for you
 10 but it's the late '90s.
 11 A. Late '90s?
 12 Q. Mm.
 13 A. I don't know. I can't remember, I'm sorry.
 14 Q. Would you remember if you'd been involved with
 15 that?
 16 A. I really don't know. Sorry.
 17 Q. Do you accept that, if the Post Office had been
 18 aware of any concerns as to the integrity of
 19 Horizon data, that should have been disclosed to
 20 subpostmasters in cases where the data relied on
 21 was generated by Horizon?
 22 A. Absolutely.
 23 Q. Could we please bring up page 12 of your
 24 statement. Looking at the end of paragraph 26,
 25 you say:

1 properly and I wasn't aware of any cases others
 2 might have had. So I just assumed that it was
 3 working properly.
 4 Q. Can you recall anyone in the Criminal Law Team
 5 standing back and saying "Well, hang on, our
 6 prosecutions are now going to rely on data from
 7 this system; we need to satisfy ourselves that
 8 it's accurate and that it produces reliable
 9 data"?
 10 A. No, I don't remember that.
 11 Q. Why do you think no one asked that question
 12 within the team?
 13 A. I really don't know. I've got no recollection
 14 of that.
 15 Q. We've discussed that the introduction of Horizon
 16 would lead to significant changes to the way in
 17 which prosecutions were brought. Can you recall
 18 any change -- so I asked you earlier about
 19 whether there was a discussion of how
 20 prosecutions would change.
 21 A. Mm-hm.
 22 Q. In practice, do you recall any change in the way
 23 to which prosecutions were brought against
 24 subpostmasters for theft or false accounting,
 25 such as the type of evidence that was relied on?

1 A. There were different schedules that would have
 2 been run off the Horizon system that became part
 3 of the evidence, yes.

4 Q. Do you recall ever being involved in a case
 5 post-Horizon where the defendant alleged that
 6 the data was inaccurate -- sorry, the data
 7 produced by Horizon was inaccurate?

8 A. No, I don't recall that.

9 Q. Were you aware at all of Post Office's
 10 contractual rights to data or information held
 11 by initially ICL Pathway or Fujitsu to support
 12 prosecutions?

13 A. I do know that the Post Office had the right to
 14 get that information and the reason I know that,
 15 when the agreement was being negotiated, I did
 16 have a very small dealing, I think through one
 17 of my colleagues in the corporate or commercial
 18 team, of strongly recommending that there should
 19 be a clause within the agreement, saying that
 20 Post Office Legal Services or the Investigators
 21 could get access to statements and data without
 22 having to pay lots of additional money.

23 So I saw a very small part of -- I think it
 24 was either a draft agreement or a service level
 25 agreement about that. But I didn't see the

41

1 advised on prosecutions later, was your work in
 2 understanding that you could have obtained such
 3 that from Fujitsu if necessary?

4 A. Absolutely, 100 per cent.

5 Q. Was that common knowledge within the Criminal
 6 Law Team.

7 A. I think so, yeah. I'd be surprised if it
 8 wasn't.

9 Q. To what type of data did you understand you
 10 could access?

11 A. I got them to draft it very broadly, so that
 12 there was anything that could ever come up in
 13 the course of a criminal prosecution. I wasn't
 14 thinking about any particular type of data.
 15 I just wanted to -- the Post Office had
 16 an open-ended way of doing this, because
 17 I couldn't probably conceive the kind of cases
 18 at that stage that would come up in.

19 Q. The Inquiry has heard evidence about audit data
 20 called ARQ data?

21 A. Mm.

22 Q. Were you aware of that type of data at the time
 23 you were involved in prosecution?

24 A. No, I only found out about ARQ data either
 25 through reading the *Computer Weekly* article in

43

1 whole agreement because it was dealt very much
 2 within who needed to know what and that was
 3 through a colleague in the Company and
 4 Commercial Team.

5 Q. Can you recall the name of that colleague?

6 A. No.

7 Q. Do you recall roughly when that was?

8 A. It would have been about the time that the
 9 agreement was being -- when it was being
 10 negotiated.

11 Q. You were, at that point, a senior lawyer?

12 A. I was, yeah.

13 Q. Were you the only person consulted in respect of
 14 those contractual matters in the team?

15 A. I don't know. But I was the person who was
 16 asked about that particular clause.

17 Q. Your advice, as you said, was to ensure that
 18 data could be obtained --

19 A. Yeah.

20 Q. -- without significant cost?

21 A. Absolutely.

22 Q. Did you see the final version of the agreed
 23 clause?

24 A. I don't know if I did or not.

25 Q. So when you came to prosecute cases or when you

42

1 2009 or one of the cases, either the *Bates* case
 2 or the *Hamilton* case.

3 Q. So presumably you didn't obviously use this data
 4 in any of the prosecutions in which you were
 5 involved?

6 A. No, because I didn't know it existed until 2009.

7 Q. Why do you think -- as a lawyer who'd advised on
 8 to what types of data the Post Office should be
 9 entitled, can you explain or proffer a reason as
 10 to why you weren't aware of the available of ARQ
 11 data?

12 A. I didn't I so I knew the types of data that --
 13 I just said everything. I requested it broadly
 14 because I didn't know what the data was and
 15 I just wanted it to be belt and braces, that we
 16 could get anything we needed, even though
 17 I didn't know what type of things it might be
 18 needed for. That's just being careful, trying
 19 to get the best for your organisation.

20 Q. I want to just quickly deal with training. You
 21 say that there was training available for
 22 lawyers in the Criminal Law Team but that you
 23 weren't initially able to attend it?

24 A. Mm.

25 Q. Do you remember who in your team was responsible

44

1 for overseeing your training or professional
2 development?
3 **A.** I guess two things. I think, in relation to
4 getting your -- I think it was CPD points in
5 those days, you were personally responsible for
6 ensuring you had all your CPD points or more.
7 In relation to your sort of like personal
8 development in a more general way, which could
9 be wider than just getting your CPD points, that
10 was between you and your team leader, your
11 manager, and that's something that would be
12 looked at at appraisal time.
13 **Q.** We know in your case you didn't have the Horizon
14 training?
15 **A.** Yeah.
16 **Q.** But can you recall whether or not that training
17 was intended to be compulsory for members of the
18 Criminal Law Team?
19 **A.** I think it's one of those things that was
20 intended to be compulsory, if you were there,
21 but, if you were not there for any reason,
22 obviously it couldn't be compulsory. And the
23 Post Office wasn't the kind of horrible employer
24 that said, if that training was on that date but
25 your child was sick or it's a day you're meant

45

1 **SIR WYN WILLIAMS:** So, well, I make it 11.01 so just
2 after 11.15, Mr Stevens, yes.
3 **MR STEVENS:** Thank you, sir.
4 **SIR WYN WILLIAMS:** Fine.
5 (11.01 am)
6 (A short break)
7 (11.17 am)
8 **MR STEVENS:** Good morning, sir, can you see and hear
9 me?
10 **SIR WYN WILLIAMS:** Yes, I can, thank you.
11 **MR STEVENS:** Thank you. I said we were going to go
12 on to the case study, there's just one point
13 I want to clarify. In your evidence this
14 morning, or earlier this morning, you said,
15 "I understand there were discussions at board
16 level about the reliability of Horizon"
17 **A.** Mm-hm.
18 **Q.** Can I ask, when did you become aware of that?
19 **A.** I think I found that out through one of the
20 cases. I think it was either the *Bates* case or
21 the *Hamilton* case, the transcripts.
22 **Q.** But just to confirm, your evidence is at the
23 time?
24 **A.** Definitely at the time I did not know.
25 **Q.** I want to turn, then, to the case study of

47

1 to be looking after your child, that you had to
2 attend on that day. I just hoped that it would
3 be reorganised later but I don't remember
4 attending it.
5 **Q.** Do you consider it problematic to have received
6 no training on Horizon but to then advise on
7 prosecutions in which Horizon data was the
8 source of evidence?
9 **A.** If I'd had any opportunity to attend the Horizon
10 training, I would have. But I can't remember
11 why I couldn't. I remember feeling peeved that
12 I couldn't because it wasn't on a day I could.
13 But I'd have wanted to and I was never the kind
14 of person who avoided training. In fact, I even
15 went on courses on Saturdays. So I'm the kind
16 of person who loves training and sees the
17 benefit of it. So, if I could, I would and,
18 sadly, I couldn't for whatever reason. I can't
19 remember.
20 **MR STEVENS:** Sir, I think that's a good time to
21 pause, actually, before we move on to the case
22 study.
23 **SIR WYN WILLIAMS:** Yes, by all means. Is 15 minutes
24 sufficient for everyone?
25 **MR STEVENS:** Yes, sir, thank you.

46

1 *R v Brennan*. Lisa Brennan is a Core Participant
2 in these proceedings and the Inquiry is
3 examining it as -- this prosecution as a case
4 study. It's the first time that the Inquiry
5 will look at this case study and I want to turn
6 first to the judgment of the Court of Appeal
7 Criminal Division in the case of *R v Hamilton*,
8 when Ms Brennan's conviction was quashed.
9 Please can I turn to POL00113278. It's in your
10 bundle at B36. Please can we turn to page 59,
11 paragraph 286.
12 **A.** Yes.
13 **Q.** To introduce the case, I'm going to read
14 a substantial portion of this, it says:
15 "On 4 September 2003, in the Crown Court at
16 Liverpool before His Honour Judge Phipps and
17 a jury, Lisa Brennan (who had become a [Post
18 Office] counter clerk when she was 16 years old)
19 was convicted on 27 counts of theft representing
20 a shortfall of £3,482.40. She was acquitted on
21 five further counts. On 6 September 2003, she
22 was sentenced to six months' imprisonment
23 suspended for two years. On 11 May 2004, her
24 appeal against conviction (on the basis of
25 inconsistent verdicts) was dismissed. As

48

1 a result of the proceedings against her, she was
 2 forced to file for bankruptcy.
 3 "[Post Office] decided to pursue criminal
 4 charges against Ms Brennan in relation to events
 5 in 2001 -- close in time to the rollout of
 6 Horizon. According to the limited available
 7 documentation, the prosecution case was that
 8 when she paid out cash for allowance and benefit
 9 vouchers, she removed more cash than was
 10 permitted by the voucher and kept the difference
 11 herself. The evidence of theft depended on the
 12 difference between the amount Horizon showed had
 13 been entered onto the system and the lesser
 14 amount of the voucher.

15 "Ms Brennan admitted the discrepancies. She
 16 said that they were errors on her part because
 17 of problems at home and pressures of work. She
 18 denied theft and said she did not know what had
 19 happened to the money.

20 "[Post Office] accepts that this was
 21 an unexplained shortfall case and that evidence
 22 from Horizon was essential to Ms Brennan's case.
 23 Her explanation was that she must have made
 24 keystroke errors when entering voucher amounts
 25 onto Horizon. The prosecution did not consider

49

1 has been overturned, and I hope she gets the
 2 compensation she deserves. But I really didn't
 3 know that the system was unreliable at the time
 4 that I had any part in her prosecution. But I'm
 5 still really sorry.
 6 **Q.** I want to start by looking at some of the
 7 evidence that was before the court and, if we
 8 could bring up your witness statement at
 9 paragraph 38, please. It's page 18. So you set
 10 out at paragraph 38 what you received as a case
 11 file to do, I think, step 1, the initial review.
 12 You refer to -- we don't need to go to all
 13 these -- but the memorandum by Steve Bradshaw.
 14 As we are introducing this case, can you just
 15 explain who Steve Bradshaw was?
 16 **A.** So Steve Bradshaw was the investigating officer
 17 in the case.
 18 **Q.** We then have Steve Bradshaw's summary of
 19 investigation, an antecedents form, and then we
 20 have summaries of the interview and there's two
 21 references there to which we'll turn in
 22 a moment. If we can go over the page, please,
 23 you say:

24 "It was not uncommon for further summaries
 25 of the interviews to be created on the request

51

1 whether a bug, error or defect could have
 2 affected this process. There is nothing to
 3 indicate that any ARQ data was obtained at the
 4 time of the criminal proceedings. There was no
 5 evidence to corroborate the Horizon evidence.
 6 The issue at trial was dishonesty but there was
 7 insufficient proof of an appropriation."

8 It goes on to say that the Post Office had
 9 conceded that the prosecution was unfair for
 10 Ground 1 abuse but the Court of Appeal Criminal
 11 Division found that it was also an affront to
 12 justice, Ground 2 abuse, and public interest
 13 required the Court of Appeal to mark the latter
 14 conclusion. So the appeal was -- sorry, the
 15 conviction was quashed on the basis of both
 16 Ground 1 and Ground 2 abuses.

17 Before I turn to look at the case, is there
 18 anything you -- any reflections you have or
 19 thoughts you had arising from the decision in
 20 *Hamilton*.

21 **A.** I think the decision was right. I'd like to
 22 take this opportunity to apologise to Lisa
 23 Brennan for being any part in the prosecution of
 24 her and for the harm it clearly has caused her,
 25 and that I'm really pleased that her conviction

50

1 of either the prosecution or the defence.
 2 An administrator in the Security and
 3 Investigations Team would typically listen to
 4 the tape and produce a new summary clarifying
 5 the point in question. [You] cannot recall
 6 exactly which version of these documents [you]
 7 would have reviewed in this file", and you refer
 8 to the documents we'll turn to in a moment.

9 You go on to say that a full transcript may
 10 have been available but it's unlikely to have
 11 been provided with the case file at the time.

12 **A.** Correct.

13 **Q.** I want to start first with the full
 14 transcript -- or, as it's been put in there, the
 15 full transcript. Can we please bring up
 16 POL00047320, and that's tab B1 in your bundle.
 17 At the top we see this is the "Record of Tape
 18 Recorded Interview". It runs to 25 pages. This
 19 is the document I understand you say was the
 20 full transcript?

21 **A.** I think so, yes. It looks like full transcript.

22 **Q.** In metadata that has been provided by the Post
 23 Office, so data that -- as to how it's saved on
 24 an electronic document, it states that this
 25 document name was "tape transcript.1", with the

52

1 date of the document being 18 June 2002. So
 2 some -- if that is accurate, some five days
 3 after the interview.
 4 **A.** That sounds correct. I can't argue with that.
 5 **Q.** Can we bring up, please, POL00047322, and that's
 6 B2 in your bundle. This document at the top
 7 says, "Summary Record of Tape Recorded
 8 Interview". Are you familiar with this --
 9 you're familiar with this type of document?
 10 **A.** Yes.
 11 **Q.** Can you just explain in summary terms how you --
 12 how the summary record of a tape recorded
 13 interview would fit into your work in reviewing
 14 the case?
 15 **A.** I would review whichever version of the document
 16 was in the file when the Investigator sent it to
 17 me, and what I can't say is which version of the
 18 interview was in the file when it came to me.
 19 **Q.** This document runs to 12 pages.
 20 **A.** Mm-hm.
 21 **Q.** Again, in metadata provided by the Post Office,
 22 it states that the file title is "Summary Tape
 23 Transcript.1.doc" with a date of 19 June 2002.
 24 So if that's accurate, does it seem fair to say
 25 that a transcript was made initially on 18 June

53

1 versions of the summary of tape record
 2 interview. I don't know which one was prepared
 3 first and in which order. All I can say is that
 4 I would have looked at the one that was in the
 5 file when I came to advise on the file, but
 6 I can give you no explanations why -- which ones
 7 were prepared first and why. I haven't got
 8 enough information to help you on that.
 9 **Q.** That document can come down for the time being.
 10 If we assume the timeline is accurate, that
 11 timeline is accurate, and we have a summary of
 12 interview done on 19 June and then there's
 13 an amended summary done on 22 July in the run-up
 14 to the trial, can you think of any reason why
 15 there would be a need for an amended transcript
 16 of interview in the run-up to trial -- sorry,
 17 amended summary of interview in the run-up to
 18 trial?
 19 **A.** Usually how it worked was you'd have the shorter
 20 summary of tape record interview when you first
 21 have the file and then, frequently, the lawyer
 22 in the Criminal Law Team or certainly myself, if
 23 I felt that there was not something covered in
 24 the summary, I might go back to the investigator
 25 and say "Elaborate on this point". Sometimes it

55

1 and then this summary record was produced
 2 shortly afterwards?
 3 **A.** I really don't know. I think the only person
 4 who can answer that question would probably be
 5 Steve Bradshaw.
 6 **Q.** That was going to be my next question: it would
 7 be Steve Bradshaw who produced this?
 8 **A.** I think so, or someone in their admin team.
 9 I can't remember now whether the Investigation
 10 Officer provided -- prepared any versions of the
 11 summary or whether it was all done by one of
 12 their admin people. I really don't know what
 13 was happening at that time.
 14 **Q.** Please can we bring up POL00047521 and that's
 15 B31 in your bundle. This is another "Summary
 16 Record of Tape Recorded Interview", the other
 17 one to which you've referred. It's shorter, at
 18 10 pages; do you agree?
 19 **A.** I can count -- 1, 2 -- 4, 5, 6, 7, 8, 9, 10.
 20 Yes, it's a 10-page summary, yes.
 21 **Q.** The metadata provided by the Post Office states
 22 that the file title is "amended.summary of tape
 23 transcript 1", with a date of 22 July 2003?
 24 **A.** If you tell me, yes. This means nothing to me.
 25 All I can say is I can see the three different

54

1 might be prosecution counsel would ask for
 2 fuller versions and sometimes it came from the
 3 defence. But it was not uncommon for there to
 4 be different versions and I really don't know --
 5 I can't talk about the timeline as to the
 6 production of these summaries. I think you
 7 really have to ask Steve Bradshaw that.
 8 **Q.** Please could we look at POL00047502. It's B19
 9 in your bundle. This is a list of exhibits. If
 10 we could go to the bottom, please. Thank you.
 11 Number 37, SB/12, so that's an exhibit to
 12 Stephen Bradshaw's statement; would you agree?
 13 **A.** Yes.
 14 **Q.** It says, "Typed copy of interview".
 15 **A.** Yes.
 16 **Q.** Do you know -- well, firstly can you recollect
 17 which -- whether a summary would have been put
 18 forward to court or the full transcript would
 19 have been put forward?
 20 **A.** I really don't know. If I could see the full
 21 bundle of exhibits, I'd be able to help you on
 22 that. I don't know whether Steve Bradshaw's
 23 statement helps. Does it say how many pages
 24 were in his summary?
 25 **Q.** We can -- if you -- if we take down that

56

1 document. Unfortunately, we're going to have to
2 bring up two documents at the same time. It's
3 POL00047506, and that's B23 in your bundle, and
4 if, at the same time, we could have POL00047507.
5 Just bear with us a moment while those documents
6 are shown.

7 I'll introduce this document whilst we're
8 waiting for the second page. This is
9 an unsigned statement of Stephen Bradshaw, dated
10 3 March. We see on the right, that's the first
11 page of it. We see on left there's another
12 page. It appears to run together, so we see
13 Ms Brennan explained the procedure, if an error
14 was made, the reversal process to rectify this
15 mistake was also explained. She did clarify if
16 she'd paid out the amount indicated on the
17 Horizon screen or the amount of the voucher.

18 At the very bottom of the -- in your bundle
19 B24, on our screens the left-hand side,
20 POL00047507, it says that a typed copy of the
21 interview is produced as exhibit TB/12. So
22 that's what --

23 **A.** Exhibit SB/12. Yes, that's his exhibit, yes.

24 **Q.** Exhibit, yes. So you asked to see the
25 statement?

57

1 **Q.** Would you be concerned if there was a material
2 discrepancy between the summary prepared by
3 an Investigator and the full transcript?

4 **A.** Definitely.

5 **Q.** Can we look at both of the summaries. I want to
6 just compare the summaries first. So if we can
7 again have two documents up at the same time,
8 it's POL00047521 and POL00047322, and it's B31
9 and B2 in your bundle. If we can, please, turn
10 to page 7 on the one ending 21, please.

11 **A.** Is that B2 or --

12 **Q.** I'm so sorry. Yes, if you can turn to page 7
13 in -- it might be easier actually, if you remove
14 the document from the second tab and held it
15 next to -- in B2.

16 **A.** So you want me to have B31 out of the file, yes?

17 **Q.** B31 and B2. So you can compare them together.
18 If you can't see them on the screen in front of
19 you.

20 **A.** Yeah, happy with that, and page 7 of which one?

21 **Q.** So the document ending 21, if you could turn to
22 page 7 of that, please and the document ending
23 22, please could we turn to page 8. So in the
24 document ending 21, which is on the right of our
25 screens in the hearing, if we could highlight

59

1 **A.** Yes, thank you, yes.

2 **Q.** So we can see that.

3 **A.** So he's not saying how many pages and which
4 version of the summary he is producing.

5 **Q.** In terms of normal practice in the Post Office,
6 what would you expect to be relied on the -- or
7 filed in court, the full transcript or
8 a summary?

9 **A.** It depends whether the defence had agreed
10 a summary of tape recorded interview and, if
11 that was agreed and a transcript wasn't
12 necessary -- because sometimes there are things
13 in a full transcript that both sides don't want
14 mentioned. So it really would depend on the
15 case. But in terms of fairness, if the
16 defendant wanted the whole transcript to be put
17 in the exhibit bundle, that's what I'd expect
18 and, if I felt that was relevant, that's what
19 I'd expect.

20 **Q.** So when you looked at these summaries, or when
21 you had the charging decision to make, how often
22 would you yourself request the full interview
23 transcript, rather than the summary?

24 **A.** I really can't remember how many times I did,
25 but I'm sure there were occasions that I did.

58

1 the time counter tapes at 31.00, please. Thank
2 you. Now, this is from the amended document and
3 we see it says, "SB" is Mr Bradshaw:

4 "But don't you think a clerk with 13 years'
5 experience it's a bit ... No, there's
6 an explanation. I'll show you this ... it's
7 a printout ... you know the pensions go through
8 Lisahally", and it goes on.

9 In 31.00, on 22 on the left, we see there's
10 more text there.

11 **A.** Yes.

12 **Q.** "But don't you think a clerk with 13 years'
13 experience, it's a bit ... No, there's
14 an explanation. I don't think it's just being
15 careless and pressing the wrong key twice. It's
16 happening too often. I'll show you this ...
17 it's a printout ... you know the pensions go
18 through Lisahally to be checked and [sealed off]
19 ..."

20 If we look at 32.00, again, on 22 -- sorry,
21 on the left side of our screens, 22, at point in
22 time 32.00. Mr Bradshaw is reported as saying:

23 "It's not careless."

24 Over the page, in the amended version at 21,
25 the reference to Mr Bradshaw saying, "It's not

60

1 careless" isn't there; do you accept that?

2 **A.** I can see they are two different versions, yeah.

3 **Q.** If we can turn into -- we're there, sorry. It

4 says -- actually, we can leave that there,

5 actually.

6 Can I ask you this: why would those

7 references to -- well, can you think of a reason

8 why those references to Mr Bradshaw saying "It's

9 not careless" be excluded from the amended

10 interview script?

11 **A.** I really can't answer for the different versions

12 of the tape recorded interview produced by Steve

13 Bradshaw or the Investigation Team and I don't

14 know which ones that I would have seen and when,

15 nor can I tell from what I've seen today which

16 one would have been in the bundle of exhibits.

17 But, personally, I would have expected the full

18 version to be in the bundle of exhibits.

19 **Q.** Do you think you would have had any involvement

20 in -- sorry, you can't answer whether you would

21 have given -- you were involved in these actual

22 amendments?

23 **A.** I really don't know.

24 **Q.** If you'd been approached and asked to approve

25 those amendments, would you have?

61

1 would pay out a pension and allowance voucher.

2 She demonstrated that she had the knowledge to

3 pay out correctly and she could explain the

4 procedure when rectifying any mistakes."

5 Please can we go to page 7 on the document

6 on the right, POL00047320 -- actually, sorry,

7 page 6, if we can start there. Thank you.

8 It starts at 9.00 with a discussion of

9 annual leave and Mr Bradshaw's recorded as

10 saying:

11 "As I said to you earlier we want to talk

12 about some pension and allowance discrepancies.

13 Because other people have to listen to the tape

14 can you just go through how you would pay

15 a normal pension voucher out."

16 If you can go over the page, please. Thank

17 you. At 11.00, Mr Bradshaw says:

18 "Say when you've done this you've made

19 a mistake and you [don't] know you've put the

20 wrong amount in, you may have put 2 dockets

21 instead of 1 and you're paying out ... the

22 machine's showing £200 but you've only got £100

23 but the machine's telling you to pay £200, is

24 there a way of correcting that mistake?"

There's a reply:

63

1 **A.** Only if it was going from the shorter summary to

2 the longer summary. I would not have approved

3 it going the other way from the longer summary

4 to the shorter summary. That's not the way it

5 usually worked. It was usually the officer

6 trying to get away with doing the shortest

7 summary as possible, and Legal Services coming

8 back and saying there's much more that should go

9 in here.

10 But because I haven't got all my advices and

11 all the paperwork, I can't see whether it was me

12 who picked him up on that or whether there was

13 some kind of quality and control within the

14 Investigation Team. I really can't answer that.

15 I don't know.

16 **Q.** We'll move on, then, from that. Can we leave up

17 POL00047322, that's B2, and can we also bring up

18 POL00047320, which is B1, in your bundle.

19 Thank you. So just for the record, in the

20 hearing room we have POL00047322 on the left and

21 the POL00047320 on the right. On POL00047322,

22 the left document, please can we turn to page 2.

23 At 9.00, it says:

24 "It was explained to Ms Brennan why we were

25 at the office. She was asked to explain how she

62

1 "Bin it and get the book back off them."

2 Mr Bradshaw goes on to say -- well, he gives

3 an explanation of a procedure. Ms Brennan

4 questions that and says:

5 "What do you mean?"

6 Mr Bradshaw says:

7 "Reversals. Do you know how to do

8 a reversal?"

9 If we go over the page, please. Ms Brennan

10 says:

11 "Oh yeah. What do you mean, if you're

12 checking the dockets and the dockets are wrong."

13 Mr Bradshaw:

14 "Yeah, to see if the dockets are wrong.

15 When you check your dockets and you find that

16 one is wrong, the wrong amount ..."

17 Ms Brennan says, "Yeah."

18 Mr Bradshaw:

19 "... that you paid and you haven't got ...

20 it's gone in the machine, how would you correct

21 that so you ..."

22 Ms Brennan said:

23 "Er ... go to reversals."

24 Mr Bradshaw says:

25 "Do you know how to do a reversal?"

64

1 Ms Brennan's reply is:
 2 "I think so, yeah. I presume I do, if
 3 I didn't, I'd just ask someone."
 4 Mr Bradshaw:
 5 "Yeah. Have you ever done one?"
 6 Ms Brennan:
 7 "I dunno. Probably."
 8 Do you think the summary fairly reflects
 9 what is said in the interview when it's
 10 summarised by saying that Ms Brennan
 11 demonstrated that she had the knowledge to pay
 12 out correctly and she could explain the
 13 procedure when rectifying any mistakes?
 14 **A.** No, no.
 15 **Q.** Why wasn't that picked up on?
 16 **A.** As I keep saying, I don't know which version of
 17 the summary that I had before me when I gave the
 18 various advices and I don't know which version
 19 of the summary made it into the exhibit-bundle.
 20 I really don't know which versions I've seen and
 21 which versions I saw at which stage, and which
 22 versions made it into the exhibit bundle.
 23 I really can't say. I don't know.
 24 This 20 -- what, 25/26 version is obviously
 25 the better version and I would have hoped that
 65

1 these discrepancies being that Ms Brennan had
 2 intentionally carried out a fraud."
 3 You set out your concerns in a memorandum to
 4 Stephen Bradshaw --
 5 **A.** Yes.
 6 **Q.** -- which we don't need to turn to because you
 7 say in your witness evidence at 41 that, in the
 8 memorandum, you did not request any details
 9 about whether Horizon was operating accurately:
 10 "... because I assumed it was and Ms Brennan
 11 had not questioned the accuracy of the data in
 12 her interview. If she had, or if I had any
 13 reason to doubt the Horizon system, I would have
 14 asked for the accuracy of the data to be checked
 15 in addition to the other points raised."
 16 Is it fair to say, then, in order for Post
 17 Office -- or in a case you were advising on, in
 18 order for you to advise the Post Office to
 19 investigate the accuracy or reliability of
 20 Horizon, it was up to the subpostmaster to raise
 21 whether the data was accurate or not?
 22 **A.** If I had a whiff that the system was not working
 23 reliably, I would have requested that evidence.
 24 One of the ways I might have got a whiff there
 25 was a potential issue would have been the
 67

1 that was the one that was put before the courts.
 2 I'm pretty sure it would have been.
 3 **Q.** Assuming the chronology, which I said earlier,
 4 that there's a full transcript on 18 June,
 5 longer summary on 19 June 2002, and then
 6 an amended summary on 22 July 2003, in the
 7 run-up to trial, if that chronology is right,
 8 does that tell you about which one may have been
 9 more likely to --
 10 **A.** I'm sorry, I really cannot answer these
 11 questions. I really don't know. The only
 12 person who would know is Steve Bradshaw.
 13 **Q.** Let's look at the reliance on Horizon data then.
 14 Please can we look at your witness statement at
 15 paragraph 39 onwards -- page 19, sorry.
 16 That's perfect, thank you. Let's actually
 17 look at paragraph 40. You say:
 18 "On review of the file, I would have noticed
 19 that the only direct evidence of a pension fraud
 20 was contained in the Horizon data discrepancies.
 21 As explained above, I had no reason to doubt the
 22 accuracy of these discrepancies."
 23 You go on to say:
 24 "... initially, I did not think there was
 25 enough evidence to support the explanation for
 66

1 defendant raising it as an issue. I don't think
 2 I'd had any cases where it had been an issue, so
 3 I believed it was working properly.
 4 Ms Brennan didn't raise it as an issue in
 5 her interview because, if she had, I would have
 6 requested that. In any event, when it came to
 7 my advice of I think it was 13 November, I'm
 8 pretty sure that I did ask for a statement
 9 saying whether the system was operating properly
 10 and I've asked repeatedly for a copy of that
 11 memorandum and it's not been disclosed to me.
 12 **Q.** Well, let's look at that. It starts -- I think
 13 it starts at paragraph 58 of your statement,
 14 page 25, please. You say:
 15 "My advice would have included any further
 16 steps that could be carried out by investigators
 17 to improve the likelihood of conviction. For
 18 example, it appears, from question 20.3 of the
 19 Request, that I requested a witness statement
 20 confirming the accuracy of the Horizon data."
 21 You say something similar at paragraph 70,
 22 page 29. You say:
 23 "In his memorandum [you're referring to
 24 Mr Bradshaw here] dated 14 March 2003, Steve
 25 Bradshaw says 'Concerning point 4 of your memo
 68

1 dated 13 November 2002. I have spoken to Sonia
2 Cassidy at Lisahally in Northern Ireland. She
3 informs me that this type of statement [is] not
4 normally done and the matter has been discussed
5 previously with Colin Justice'. I believe he is
6 essentially saying that it has not been possible
7 to have a witness statement drafted by
8 a representative of the Department of Social
9 Security ... confirming the accuracy of the
10 Horizon data, as I requested in my 13 November
11 2002 memorandum."

12 The Department of Social Security, their
13 involvement, as I understand it but tell me if
14 I'm wrong, is that they would take the data from
15 Horizon and compare it to vouchers that had been
16 sent to them, pension vouchers, and notice if
17 there was a discrepancy, and that's what started
18 the investigation.

19 **A.** Yes.

20 **Q.** But they were not responsible for the Horizon IT
21 System; that was Fujitsu.

22 **A.** Yes.

23 **Q.** So do you accept that this point here,
24 requesting a witness statement from the
25 Department of Social Security, wasn't relevant

69

1 So I would love to see my memo of
2 13 November. I would also love to see my
3 instructions to counsel to advise on the
4 evidence and I would also love to see any
5 attendance notes about the conference with
6 counsel up in Liverpool, which I didn't attend.

7 **Q.** We know that there wasn't evidence led on the
8 integrity of the Horizon data?

9 **A.** Yeah.

10 **Q.** Your evidence is that you'd no reason to believe
11 that there was --

12 **A.** Any problems.

13 **Q.** -- any problems with it. You say that
14 Ms Brennan didn't raise any issues with it.

15 **A.** Mm.

16 **Q.** You've referred to this example here with
17 Lisahally about whether -- you know, approaching
18 the Department of Social Security. Is your
19 evidence that you think you likely would have
20 sought further evidence on the accuracy of the
21 Horizon?

22 **A.** If counsel thought it was necessary.

23 **Q.** So your evidence is that you would have asked
24 counsel's advice?

25 **A.** Yes, definitely. Because what I did, I know

71

1 to the accuracy of the Horizon data or its
2 reliability?

3 **A.** Firstly, I'm not sure whether I just said,
4 broadly, a statement confirming the accuracy of
5 the Horizon data and any respects in which it
6 was not working properly. I don't know whether
7 I said that or whether I specifically asked for
8 a statement from Lisahally. I know that there
9 is this reference here that Sonia Cassidy,
10 having had a conversation with Colin Justice,
11 that's reported back by Steve Bradshaw.

12 But the way I looked at it was something
13 that I would have got advice from counsel on
14 because I'm pretty sure that post-committal,
15 when I did my instructions to counsel to advise
16 on the evidence in the case, if there was any
17 evidence that I had asked the investigating
18 officer for that he hadn't submitted, I would
19 have tried to get a second opinion from counsel
20 to say, "Do we need a statement confirming the
21 accuracy of the evidence?" And I don't know,
22 because I can't see my instructions to counsel
23 or even see my memo from 13 November, whether
24 there was any conversation as to the best place
25 to get that statement.

70

1 that I always did, when I was doing my
2 instructions to counsel to advise on the
3 evidence, I would look at my original advice to
4 the Investigating Officer and I would see
5 whether he'd ticked all the boxes that I'd asked
6 him to. If he hadn't ticked all the boxes that
7 I'd asked him to and it was something that
8 I still personally thought was necessary, I'd
9 get a second opinion from counsel so then
10 I could come back to the Officer and say, "Well,
11 counsel agrees with me, we do need this
12 statement so please go and get it".

13 **Q.** We have in incomplete document base, we know
14 that.

15 **A.** We do.

16 **Q.** On the documents you've seen, can you point to
17 anything where you say, to an Investigator or
18 otherwise, "We need evidence on the accuracy of
19 the Horizon IT System"?

20 **A.** No, because I haven't been given the complete
21 set of documents and my solicitors have asked
22 for further documentation and specifically asked
23 for these kinds of things --

24 **Q.** Yes.

25 **A.** -- and they've not been disclosed.

72

1 Q. But your evidence is you think --

2 A. I'm pretty sure because that's how I worked.

3 I'm a real belt-and-braces girl and I'm the kind

4 of person who would check what I originally

5 asked for, what the investigator has provided

6 and, if there's any question mark, any doubt,

7 I would have got a second opinion from counsel,

8 and I do remember that's how I worked. I'm

9 quite systematic and meticulous.

10 SIR WYN WILLIAMS: Just so I'm clear about this,

11 Mrs Williamson, the way I read your paragraph 58

12 is that, although the documentation before you,

13 as everyone accepts, is incomplete, your

14 conclusion is that you did ask for a statement

15 "confirming the accuracy of the Horizon data".

16 A. Yes, sir, but I don't know whether I asked for

17 it from Fujitsu or from Lisahally when

18 I initially advised on 13 November.

19 SIR WYN WILLIAMS: But I'd be right in thinking that

20 you did ask for that evidence --

21 A. Definitely.

22 SIR WYN WILLIAMS: -- and, so far as we can tell, it

23 was not forthcoming; is that fair?

24 A. It looks like it wasn't forthcoming because

25 there is this comment on that memo from Steve

73

1 particularly all the ones with Northern Ireland

2 addresses and postcodes. And if you look at the

3 list of exhibits, a lot of the exhibits in the

4 cases are Lisahally producing -- I think they

5 call them 205A schedules. So if you look at all

6 those -- certainly all the 205A schedules are

7 produced by Lisahally. I think the P2311(b)s

8 may also be produced by Lisahally. I'm just

9 looking at the initials of the witnesses.

10 Q. We can bring it up on screen it's POL00047502.

11 A. Yes, so looking at all those P2311(b)s, they're

12 all produced by Lisahally. Mainly, by it looks

13 like someone called Gerard Moran, and someone

14 with a GO initial who I can't find on the

15 witness list. Then VL, Valerie (unclear), again

16 she's a civil servant and I'm pretty sure she's

17 from Lisahally.

18 Q. So your point you're making is there's number of

19 witnesses who were from Lisahally dealing with

20 other matters --

21 A. Yes, who were producing, in effect, schedules

22 that they've printed off from the Horizon

23 system. Yes, I think all the first 23 documents

24 on the list of exhibits are all things that

25 Lisahally witnesses produced.

75

1 Bradshaw referring to a comment --

2 a conversation between Sonia Cassidy and Colin

3 Justice, to which I wasn't party to, but I would

4 have --

5 SIR WYN WILLIAMS: Can I just --

6 A. Sorry.

7 SIR WYN WILLIAMS: On your evidence you have reached

8 the conclusion that you did ask for the evidence

9 and your conclusion is, based on what you have

10 seen, that it probably wasn't provided. Now, we

11 can ask Mr Bradshaw about this as well. But

12 have I fairly summarised your evidence?

13 A. I think so, yes.

14 SIR WYN WILLIAMS: Fine. Thank you.

15 MR STEVENS: There's one further document I'd like

16 to take you to on this issue. It's in the

17 witness list. It's in your bundle at B21. It's

18 POL00047504, and page 2, please. Thank you.

19 Witness 10 is Denise Johnston, Paid Order Unit

20 28 Temple Road, Lisahally, County Derry.

21 So it seems that you did eventually obtain

22 some evidence from Lisahally?

23 A. Lots of evidence from Lisahally because a lot of

24 these witnesses are from Lisahally, all these

25 civil servants, they are from Lisahally,

74

1 Q. Thank you. That document can come down. Thank

2 you.

3 Very briefly on disclosure, we only have

4 draft disclosure statements in this case. You

5 say you would have had a role to play in

6 reviewing those.

7 A. Yes.

8 Q. Can you summarise what that was, please?

9 A. So usually there were to be the schedule of

10 non-sensitive unused material, a schedule of

11 sensitive unused material, and the Investigating

12 Officer's report on the unused material. All

13 those would have been sent to me at the time the

14 committal papers were being prepared.

15 So what I would have done is, my first job

16 would have been looking at the committal papers,

17 looking at the statements and the exhibits,

18 firstly to satisfy myself that there was a case

19 to answer, to go to the Crown Court. Then,

20 having looked at that, I would then look through

21 the schedules that the officer had prepared to

22 make sure he had included everything on it that

23 I was aware of. So everything that wasn't

24 already a statement or an exhibit, and I would

25 also, to make sure he'd done his job properly,

76

1 I would also read through the investigation
2 officer's file to see whether there's any
3 references or any documents that have not been
4 listed as exhibits or statements or unused
5 material.

6 And then, if there was anything I was aware
7 of, I'd go back to the officer and say, "Well,
8 you know, it's not listed, can I have a copy of
9 it?" and make sure it gets listed on the right
10 schedule.

11 And then my next job at committal would be
12 is there anything that undermines the
13 prosecution case or, with reference to the
14 interview, anything that may assist the defence?

15 **Q.** At the time, did you think it likely that Post
16 Office held or had access to documents that
17 would tend to support or disprove the -- sorry,
18 support or undermine the integrity and
19 reliability of the Horizon IT System?

20 **A.** No, I didn't, otherwise I would have asked for
21 them.

22 **Q.** We discussed earlier your involvement in the
23 advising on the contract, so that the Post
24 Office had access to Fujitsu data.

25 **A.** Mm.

77

1 important or it was an option to get a statement
2 search as that.

3 **A.** I wouldn't have asked for it if I didn't think
4 it was necessary.

5 **Q.** So why didn't you do the same for documentation?

6 **A.** Which documentation?

7 **Q.** Documents -- a documentation relevant to the
8 accuracy of the Horizon IT System?

9 **A.** Because I did -- I'm pretty sure I would have
10 asked counsel whether we needed a statement from
11 anyone else to prove the accuracy of the system
12 and I really -- because I haven't got the rest
13 of the documents and I wasn't at the conference
14 with counsel, I can only assume it wasn't
15 thought necessary in this particular case.

16 **Q.** So that's a statement -- whether a statement was
17 necessary to prove it, but, in terms of Post
18 Office and understanding the documents to which
19 it had access, which may support or undermine
20 the integrity of the Horizon IT System, what, if
21 any, queries did you make as to what Post Office
22 or Fujitsu held in respect of that
23 documentation?

24 **A.** If you're asking me with the benefit of
25 hindsight, with all the documents that I now

79

1 **Q.** You presumably thought that Fujitsu would have
2 had documentation relevant to the integrity of
3 the Horizon system?

4 **A.** If necessary, yes, yes. So that's why
5 I originally asked for a statement about the --
6 whether the system was operating properly.
7 I don't know whether I asked for it from the
8 right place but that's evidence that could have
9 been obtained if necessary.

10 **Q.** Did you make any enquiries as to whether there
11 were documents held by Fujitsu or Post Office
12 that tended to support or undermine the
13 integrity of the Horizon IT System?

14 **A.** No, because I didn't think it was necessary in
15 this case and I thought that's something that
16 the Investigation Officer would do, because they
17 gather the evidence, we advised on the evidence
18 on the basis of the material that they disclosed
19 to us and the information that we had, and then,
20 obviously, the Investigation Manager, National
21 Investigation Manager, advised whether there
22 should be a prosecution.

23 **Q.** Your evidence earlier in respect of getting
24 a statement on the accuracy of the system, my
25 understanding of that is you thought it was

78

1 know exist which I didn't know existed until
2 2009, obviously I should have requested such
3 a statement. But, at that time, back in
4 2002/2003, I didn't know that such -- well, (1)
5 I didn't know the system was unreliable and (2)
6 I didn't know all these various documents
7 existed and could be produced because, if I did,
8 I would have asked for them.

9 I really didn't know. It's one of those
10 things where you don't know what you don't know.

11 **Q.** I took you earlier to Mr Bradshaw's draft
12 statement.

13 **A.** Mm.

14 **Q.** There was a brief question on that. To what
15 extent, if at all, would you have been involved
16 in drafting those statements?

17 **A.** No, the Investigation Officer drafted his own
18 statements and he did the statements of the
19 witnesses together with the witness.

20 **Q.** Please can we turn to paragraph 81 of your
21 statement. It's page 32. You say that:

22 "It is also clear that there were more
23 structural problems with the working culture at
24 the Post Office that prevented the open and
25 transparent sharing of information. It was very

80

1 hierarchical and there was limited communication
 2 between the different strata of the
 3 organisation. Even the Criminal Law Team
 4 adopted a culture in which we typically kept our
 5 work to ourselves and did not communicate openly
 6 as a wider team. I think this undoubtedly
 7 played a part in ensuring that the issues with
 8 Horizon were obstructed for so long."

9 You refer there to the more structural
 10 problems with the working culture at the Post
 11 Office, could you just expand on what those
 12 structural problems were?

13 **A.** Okay, so I'll start at the top, so say, for
 14 example, the Post Office Board. The Post Office
 15 Board, from what I've read in the various
 16 judgments, clearly knew there were problems with
 17 the Horizon system, and that information was not
 18 shared further down to the ordinary lawyers
 19 within the Criminal Law Team.

20 Then you look at other people high up within
 21 the Post Office, some of whom you may have heard
 22 from giving evidence -- I don't know because
 23 I haven't been reading the evidence -- but I can
 24 see from the various transcripts and summaries,
 25 and also from the 2009 *Computer Weekly* article,

1 Criminal Law Team. It was very different.
 2 **MR STEVENS:** Thank you, sir. That concludes my
 3 questions. Unless you have any questions first,
 4 I can see if any of the Core Participants have
 5 any.

6 **SIR WYN WILLIAMS:** No, I don't have any.

7 **MR STEVENS:** It's a nil return in here, sir.

8 **SIR WYN WILLIAMS:** Right.

9 Well, I'd like to thank you very much,
 10 Mrs Williamson, for first of all making
 11 a detailed statement and, indeed, for pointing
 12 out that documentation in relation to aspects of
 13 your evidence is incomplete. I'm not saying
 14 that we will find that additional documentation,
 15 but we'll certainly do our best to try to locate
 16 it if we can, even at this late stage.

17 I'd like to thank you too for answering all
 18 the questions that you have this morning.

19 So I think that concludes today's
 20 proceedings, yes, Mr Stevens?

21 **MR STEVENS:** That's correct, sir, and we're back on
 22 Friday at 10.00.

23 **SIR WYN WILLIAMS:** All right then. So I'll see
 24 everyone then. Bye.

25 **MR STEVENS:** Thank you, sir.

1 that there were people high up in the Post
 2 Office who did know things. And again, that was
 3 not shared with the Criminal Law Team.

4 Then I think about people within Legal
 5 Services as a whole. So, say, for example,
 6 people in the Company and Commercial Teams would
 7 not have shared information, unless it was
 8 necessary, with people in the Criminal Law Team.
 9 And then right at the bottom, in Legal Services,
 10 were the Criminal Law Team because, as usual,
 11 criminal lawyers are kind of looked down on by
 12 other lawyers within the department.

13 Very little was shared with us, unless they
 14 wanted our help on say, for example, me helping
 15 them with that little section of the agreement
 16 about being able to get statements and not being
 17 charged too much.

18 And then, with our own team, it just wasn't
 19 something that happened. We didn't sit down and
 20 have discussions on cases and general issues.
 21 It's something that did happen in the Employment
 22 Law Team. We used to have a sort of like
 23 a weekly one-to-one on a Monday morning where
 24 people did raise cases and did raise issues, but
 25 that's not something I remember happening in the

1 (12.17 pm)
 2 (The hearing adjourned until 10.00 am
 3 on Friday, 10 November)

I N D E X

TERESA MARY WILLIAMSON (affirmed)	1
Questioned by MR STEVENS	1

<p>MR STEVENS: [13] 1/3 1/6 1/10 46/20 46/25 47/3 47/8 47/11 74/15 83/2 83/7 83/21 83/25</p> <p>SIR WYN WILLIAMS: [14] 1/5 46/23 47/1 47/4 47/10 73/10 73/19 73/22 74/5 74/7 74/14 83/6 83/8 83/23</p>	<p>19 June 2002 [1] 53/23 1990 [1] 3/16 1992 [1] 4/21 1997 [1] 30/14 1999 [1] 39/10</p>	<p>5 50 per cent [1] 28/12 500,000 [1] 8/4 55 per cent [1] 30/5 58 [2] 68/13 73/11 59 [1] 48/10</p>	<p>accounting [10] 5/14 11/23 22/19 22/23 23/22 23/23 25/7 35/18 36/9 40/24 accounts [2] 24/20 24/20 accuracy [17] 39/16 39/19 66/22 67/11 67/14 67/19 68/20 69/9 70/1 70/4 70/21 71/20 72/18 73/15 78/24 79/8 79/11 accurate [8] 30/21 39/22 40/8 53/2 53/24 55/10 55/11 67/21 accurately [1] 67/9 accused [3] 3/23 28/16 29/16 achieve [1] 17/8 acquitted [1] 48/20 act [3] 19/1 22/9 37/16 acting [1] 22/1 actual [1] 61/21 actually [11] 2/13 9/15 19/6 21/12 22/14 46/21 59/13 61/4 61/5 63/6 66/16 actus [1] 26/19 addition [1] 67/15 additional [2] 41/22 83/14 addresses [1] 75/2 adds [1] 17/7 adjourned [1] 84/2 admin [2] 54/8 54/12 administrative [1] 10/18 administrator [1] 52/2 admit [1] 4/15 admitted [2] 37/20 49/15 adopted [1] 81/4 advice [13] 5/4 6/20 10/21 17/13 26/23 27/19 29/3 42/17 68/7 68/15 70/13 71/24 72/3 advices [2] 62/10 65/18 advise [11] 4/10 27/10 28/5 28/9 29/12 46/6 55/5 67/18 70/15 71/3 72/2 advised [8] 18/5 27/16 27/21 43/1 44/7 73/18 78/17 78/21 advising [6] 4/12 5/5 28/19 32/13 67/17 77/23 affect [2] 30/18 37/4 affected [2] 16/21 50/2</p>	<p>affirmed [2] 1/8 85/2 afford [7] 26/14 26/19 27/11 28/6 28/8 31/10 31/13 affront [1] 50/11 after [11] 4/23 9/4 11/10 13/1 15/10 15/11 15/12 25/9 46/1 47/2 53/3 afterwards [1] 54/2 again [7] 28/25 36/20 53/21 59/7 60/20 75/15 82/2 against [9] 5/13 11/21 22/17 35/23 36/10 40/23 48/24 49/1 49/4 agency [1] 35/13 ago [2] 12/3 37/17 agree [3] 35/6 54/18 56/12 agreed [6] 23/18 24/15 24/16 42/22 58/9 58/11 agreement [7] 41/15 41/19 41/24 41/25 42/1 42/9 82/15 agrees [1] 72/11 aimed [1] 32/23 all [41] 4/17 5/16 8/19 9/17 11/4 13/2 14/22 19/3 24/12 25/4 26/8 28/5 30/17 34/4 37/25 41/9 45/6 46/23 51/12 54/11 54/25 55/3 62/10 62/11 72/5 72/6 74/24 75/1 75/5 75/6 75/11 75/12 75/23 75/24 76/12 79/25 80/6 80/15 83/10 83/17 83/23 alleged [4] 23/4 24/9 25/5 41/5 allocated [2] 10/3 11/19 allowance [3] 49/8 63/1 63/12 almost [2] 3/22 32/17 along [1] 27/19 already [2] 22/13 76/24 also [20] 7/10 12/20 13/13 14/24 18/20 20/1 24/18 27/17 34/15 34/20 50/11 57/15 62/17 71/2 71/4 75/8 76/25 77/1 80/22 81/25 although [2] 5/23 73/12 always [8] 10/1 26/7 26/9 31/21 33/17 34/2 39/14 72/1 am [6] 1/2 3/5 23/11</p>	
<p>'90s [4] 34/11 38/9 38/10 38/11 '95 [6] 7/1 9/19 11/2 11/6 11/9 11/9 '95/'96 [5] 7/1 11/2 11/6 11/9 11/9 '96 [6] 7/1 9/19 11/2 11/6 11/9 11/9 '97 [1] 30/22 'Concerning [1] 68/25</p>	<p>2 20 [1] 65/24 20.3 [1] 68/18 200 [2] 63/22 63/23 2000 [1] 39/11 2000s [2] 11/14 34/12 2001 [1] 49/5 2002 [5] 53/1 53/23 66/5 69/1 69/11 2002/2003 [2] 32/3 80/4 2003 [7] 32/3 48/15 48/21 54/23 66/6 68/24 80/4 2004 [1] 48/23 2009 [4] 44/1 44/6 80/2 81/25 2023 [2] 1/1 2/1 205A [2] 75/5 75/6 21 [4] 59/10 59/21 59/24 60/24 22 [4] 59/23 60/9 60/20 60/21 22 July [1] 55/13 22 July 2003 [2] 54/23 66/6 23 [1] 75/23 25 [1] 68/14 25 pages [1] 52/18 25/26 [1] 65/24 26 [2] 38/24 65/24 27 [1] 48/19 28 [2] 39/17 74/20 286 [1] 48/11 29 [1] 68/22</p>	<p>6 6 September 2003 [1] 48/21 69 [3] 37/15 37/18 38/6</p> <p>7 70 [1] 68/21 70 per cent [1] 30/5</p> <p>8 8 November 2023 [1] 1/1 81 [1] 80/20 85 [1] 28/16</p> <p>9 9.00 [2] 62/23 63/8</p>	<p>8 8 November 2023 [1] 1/1 81 [1] 80/20 85 [1] 28/16</p>	<p>able [3] 44/23 56/21 82/16 about [43] 3/6 6/5 12/16 13/9 14/9 14/18 14/20 20/5 20/6 20/10 22/2 23/2 24/19 26/10 26/22 29/23 32/19 32/21 32/22 33/19 35/20 35/25 37/3 39/9 40/18 41/25 42/8 42/16 43/14 43/19 43/24 47/16 56/5 63/12 66/8 67/9 71/5 71/17 73/10 74/11 78/5 82/4 82/16 above [1] 66/21 Absolutely [9] 3/2 17/2 18/3 19/2 21/4 33/17 38/22 42/21 43/4 abuse [2] 50/10 50/12 abuses [1] 50/16 accept [5] 14/16 36/8 38/17 61/1 69/23 accepted [1] 18/23 accepts [2] 49/20 73/13 access [5] 41/21 43/10 77/16 77/24 79/19 accordance [2] 25/24 27/3 According [1] 49/6 account [8] 23/24 23/25 34/25 35/4 35/22 36/1 36/6 36/24</p>	<p>A able [3] 44/23 56/21 82/16 about [43] 3/6 6/5 12/16 13/9 14/9 14/18 14/20 20/5 20/6 20/10 22/2 23/2 24/19 26/10 26/22 29/23 32/19 32/21 32/22 33/19 35/20 35/25 37/3 39/9 40/18 41/25 42/8 42/16 43/14 43/19 43/24 47/16 56/5 63/12 66/8 67/9 71/5 71/17 73/10 74/11 78/5 82/4 82/16 above [1] 66/21 Absolutely [9] 3/2 17/2 18/3 19/2 21/4 33/17 38/22 42/21 43/4 abuse [2] 50/10 50/12 abuses [1] 50/16 accept [5] 14/16 36/8 38/17 61/1 69/23 accepted [1] 18/23 accepts [2] 49/20 73/13 access [5] 41/21 43/10 77/16 77/24 79/19 accordance [2] 25/24 27/3 According [1] 49/6 account [8] 23/24 23/25 34/25 35/4 35/22 36/1 36/6 36/24</p>
<p>1 10 [4] 54/18 54/19 74/19 84/3 10.00 [3] 1/2 83/22 84/2 100 [2] 18/25 63/22 100 per cent [1] 43/4 11 May 2004 [1] 48/23 11.00 [1] 63/17 11.01 [2] 47/1 47/5 11.15 [1] 47/2 11.17 [1] 47/7 12 [5] 34/16 38/23 56/11 57/21 57/23 12 pages [1] 53/19 12.17 [1] 84/1 13 [3] 14/4 60/4 60/12 13 November [5] 68/7 69/10 70/23 71/2 73/18 13 November 2002 [1] 69/1 14 March 2003 [1] 68/24 15 August [1] 2/1 15 minutes [1] 46/23 16 [1] 48/18 18 [2] 13/23 51/9 18 June [2] 53/25 66/4 18 June 2002 [1] 53/1 19 [3] 25/14 25/16 66/15 19 June [2] 55/12 66/5</p>	<p>3 3 March [1] 57/10 3,482.40 [1] 48/20 31.00 [2] 60/1 60/9 32 [1] 80/21 32.00 [2] 60/20 60/22 34 [1] 2/5 34 pages [1] 2/3 36 pages [1] 2/2 37 [1] 56/11 38 [2] 51/9 51/10 39 [1] 66/15</p> <p>4 4 September 2003 [1] 48/15 40 [1] 66/17 41 [1] 67/7</p>	<p>3 3 March [1] 57/10 3,482.40 [1] 48/20 31.00 [2] 60/1 60/9 32 [1] 80/21 32.00 [2] 60/20 60/22 34 [1] 2/5 34 pages [1] 2/3 36 pages [1] 2/2 37 [1] 56/11 38 [2] 51/9 51/10 39 [1] 66/15</p>	<p>3 3 March [1] 57/10 3,482.40 [1] 48/20 31.00 [2] 60/1 60/9 32 [1] 80/21 32.00 [2] 60/20 60/22 34 [1] 2/5 34 pages [1] 2/3 36 pages [1] 2/2 37 [1] 56/11 38 [2] 51/9 51/10 39 [1] 66/15</p>	<p>3 3 March [1] 57/10 3,482.40 [1] 48/20 31.00 [2] 60/1 60/9 32 [1] 80/21 32.00 [2] 60/20 60/22 34 [1] 2/5 34 pages [1] 2/3 36 pages [1] 2/2 37 [1] 56/11 38 [2] 51/9 51/10 39 [1] 66/15</p>	

A	appears [2] 57/12 68/18	asked [27] 17/24 21/2 24/19 35/24 40/11 40/18 42/16 57/24 61/24 62/25 67/14 68/10 70/7 70/17 71/23 72/5 72/7 72/21 72/22 73/5 73/16 77/20 78/5 78/7 79/3 79/10 80/8	back [14] 17/10 17/23 19/25 23/12 31/2 40/5 55/24 62/8 64/1 70/11 72/10 77/7 80/3 83/21	20/13 23/19 23/20 25/2 25/23 27/23 28/18 32/4 32/5 32/13 33/7 34/11 35/11 38/8 38/14 38/17 38/19 41/2 42/8 49/13 51/1 52/10 52/11 52/14 52/22 56/17 56/19 61/16 61/24 66/2 66/8 67/25 68/2 68/11 69/4 69/6 69/15 72/20 72/25 76/13 76/16 77/3 78/9 80/15 81/23
am... [3] 47/5 47/7 84/2	applied [3] 26/7 30/8 32/19	asking [2] 15/2 79/24	balancing [1] 34/21	before [13] 12/5 18/11 25/1 25/8 32/8 34/25 46/21 48/16 50/17 51/7 65/17 66/1 73/12
amended [7] 55/13 55/15 55/17 60/2 60/24 61/9 66/6	apply [5] 4/13 4/16 4/19 32/10 32/14	aspect [2] 27/8 28/3	based [2] 36/12 74/9	beginning [1] 5/23
amended.summary [1] 54/22	applying [1] 26/6	aspects [2] 26/18 83/12	basis [5] 34/21 39/21 48/24 50/15 78/18	behalf [2] 1/11 22/10
amendments [2] 61/22 61/25	appraisal [2] 8/22 45/12	assist [2] 34/19 77/14	Bates [3] 20/2 44/1 47/20	being [20] 2/18 12/7 21/21 21/23 25/11 33/2 39/2 41/4 41/15 42/9 42/9 44/18 50/23 53/1 55/9 60/14 67/1 76/14 82/16 82/16
amongst [1] 37/22	appreciate [1] 35/22	assistance [1] 17/20	be [75] 1/15 2/5 5/12 5/19 5/21 9/18 15/18 18/7 19/13 19/14 19/15 19/16 21/18 21/23 22/3 23/9 23/13 23/15 23/17 23/19 23/25 24/13 24/14 24/16 24/17 24/25 26/16 26/17 26/24 27/20 28/18 28/25 30/16 30/25 31/2 31/12 32/16 35/24 37/20 41/19 42/18 43/7 44/8 44/15 44/17 45/9 45/11 45/17 45/20 45/22 46/1 46/3 51/25 54/4 54/6 54/7 55/15 56/1 56/4 56/21 58/6 58/16 59/1 59/13 60/18 61/9 61/18 67/14 68/16 73/19 75/8 76/9 77/11 78/22 80/7	believe [3] 33/21 69/5 71/10
amount [9] 13/6 28/18 39/8 49/12 49/14 57/16 57/17 63/20 64/16	approached [3] 15/23 18/2 61/24	assistant [6] 5/17 6/6 6/15 10/2 28/22 33/8	became [7] 5/25 6/23 7/7 8/15 18/18 34/10 41/2	believed [1] 68/3
amounts [1] 49/24	approaching [1] 71/17	assistants [1] 35/11	because [43] 8/1 8/2 14/23 14/25 15/20 18/3 18/11 19/12 19/20 20/8 22/21 27/10 31/16 33/4 36/20 37/24 39/23 42/1 43/16 44/6 44/14 46/12 49/16 58/12 62/10 63/13 67/6 67/10 68/5 70/14 70/22 71/25 72/20 73/2 73/24 74/23 78/14 78/16 79/9 79/12 80/7 81/22 82/10	believing [1] 37/23
Andrew [2] 31/18 33/5	appropriate [1] 27/3	assumed [3] 39/15 40/2 67/10	bear [1] 57/5	belt [2] 44/15 73/3
angry [2] 20/6 20/7	appropriation [1] 50/7	Assuming [1] 66/3	best [5] 2/8 2/25 44/19 70/24 83/15	benefit [4] 17/9 46/17 49/8 79/24
annual [1] 63/9	approve [1] 61/24	assurance [1] 39/22	better [2] 31/4 65/25	Berridge [1] 3/10
another [4] 10/25 38/3 54/15 57/11	approved [1] 62/2	at [113]	between [6] 18/9 45/10 49/12 59/2 74/2 81/2	big [1] 21/10
answer [9] 14/13 24/23 24/25 54/4 61/11 61/20 62/14 66/10 76/19	are [23] 2/7 4/6 12/4 12/14 13/10 14/25 15/17 19/24 23/1 40/6 51/14 53/8 57/6 58/12 61/2 64/12 64/14 74/24 74/25 75/4 75/6 75/24 82/11	attend [4] 44/23 46/2 46/9 71/6	bin [1] 64/1	biggest [1] 21/14
answering [2] 36/19 83/17	area [3] 2/17 5/2 26/23	attendance [1] 71/5	bit [5] 5/4 19/20 29/23 60/5 60/13	Bin [1] 64/1
antecedents [1] 51/19	argue [1] 53/4	attending [1] 46/4	bits [1] 35/9	bit [5] 5/4 19/20 29/23 60/5 60/13
any [61] 6/17 8/23 17/13 17/18 21/1 21/2 21/5 21/19 25/5 26/4 27/14 29/18 29/25 33/1 35/20 37/2 37/6 37/9 38/18 39/11 39/16 39/24 39/25 40/1 40/18 40/22 43/14 44/4 45/21 46/9 50/3 50/18 50/23 51/4 54/10 55/14 61/19 63/4 65/13 67/8 67/12 68/2 68/6 68/15 70/5 70/16 70/24 71/4 71/12 71/13 71/14 73/6 73/6 77/2 77/3 78/10 79/21 83/3 83/4 83/5 83/6	arising [1] 50/19	audience [3] 32/16 33/9 33/10	board [4] 20/10 47/15 81/14 81/15	book [1] 64/1
anyone [2] 40/4 79/11	around [1] 5/11	audit [2] 23/9 43/19	book [1] 64/1	bookie [1] 37/13
anyone's [1] 34/5	ARQ [4] 43/20 43/24 44/10 50/3	August [1] 2/1	bookies [1] 37/13	bookkeeping [1] 34/18
anything [11] 16/12 20/22 23/19 23/20 43/12 44/16 50/18 72/17 77/6 77/12 77/14	article [9] 7/9 10/9 10/12 10/14 10/16 19/18 20/1 43/25 81/25	autonomous [1] 14/23	both [5] 12/21 13/17 50/15 58/13 59/5	bottom [3] 56/10 57/18 82/9
anywhere [1] 23/20	articulated [1] 31/19	autonomously [2] 14/1 14/17	boxes [2] 72/5 72/6	braces [2] 44/15 73/3
apart [1] 5/16	as [61] 1/10 3/4 3/13 3/16 4/18 5/3 7/4 13/10 16/23 16/23 18/22 19/4 19/7 19/11 22/1 22/8 22/10 28/21 30/8 30/16 33/11 33/15 34/10 35/5 37/8 37/20 38/18 40/25 42/17 44/7 44/9 48/3 48/3 48/25 51/10 51/14 52/14 52/23 56/5 57/21 60/22 62/7 63/9 63/11 65/16 66/21 68/1 68/4 69/10 69/13 70/24 73/13 73/22 74/11 77/4 78/10 79/2 79/21 81/6 82/5 82/10	available [6] 21/21 26/5 44/10 44/21 49/6 52/10	Bradshaw [26] 51/13 51/15 51/16 54/5 54/7 56/7 57/9 60/3 60/22	Bradshaw [26] 51/13 51/15 51/16 54/5 54/7 56/7 57/9 60/3 60/22
apologise [1] 50/22	aside [2] 13/24 29/17	avoided [1] 46/14		
appeal [5] 48/6 48/24 50/10 50/13 50/14	ask [18] 1/11 1/12 1/18 3/5 16/12 19/13 24/24 36/20 47/18 56/1 56/7 61/6 65/3 68/8 73/14 73/20 74/8 74/11	aware [15] 13/10 14/19 17/12 17/19 34/10 38/4 38/18 39/11 40/1 41/9 43/22 44/10 47/18 76/23 77/6		
appear [1] 15/1		away [3] 29/20 30/1 62/6		
appeared [1] 29/3				

<p>B</p> <p>Bradshaw... [17] 60/25 61/8 61/13 63/17 64/2 64/6 64/13 64/18 64/24 65/4 66/12 67/4 68/24 68/25 70/11 74/1 74/11</p> <p>Bradshaw's [5] 51/18 56/12 56/22 63/9 80/11</p> <p>branch [3] 23/10 35/7 35/14</p> <p>breaches [1] 30/17</p> <p>break [1] 47/6</p> <p>Brennan [19] 23/6 48/1 48/1 48/17 49/4 49/15 50/23 57/13 62/24 64/3 64/9 64/17 64/22 65/6 65/10 67/1 67/10 68/4 71/14</p> <p>Brennan's [3] 48/8 49/22 65/1</p> <p>Brentnall [1] 12/23</p> <p>brief [1] 80/14</p> <p>briefly [3] 13/20 22/23 76/3</p> <p>bring [9] 30/10 38/23 51/8 52/15 53/5 54/14 57/2 62/17 75/10</p> <p>broad [1] 34/22</p> <p>broadly [4] 16/21 43/11 44/13 70/4</p> <p>brought [3] 27/23 40/17 40/23</p> <p>bug [1] 50/1</p> <p>bundle [20] 1/15 1/19 30/25 31/1 48/10 52/16 53/6 54/15 56/9 56/21 57/3 57/18 58/17 59/9 61/16 61/18 62/18 65/19 65/22 74/17</p> <p>business [5] 2/14 2/20 7/14 13/19 33/11</p> <p>but [83] 2/17 2/22 3/13 4/17 6/18 7/12 8/4 8/20 9/4 9/16 10/10 10/15 11/10 11/19 12/5 12/25 13/2 13/3 13/22 14/6 15/25 17/9 21/15 24/5 24/25 25/6 27/2 28/12 28/23 30/16 31/20 32/16 33/8 33/9 33/13 34/16 35/11 35/13 35/23 37/6 37/18 38/10 41/25 42/15 44/22 45/16 45/21 45/24 46/3 46/6 46/10 46/13 47/22 50/6 50/10 51/2 51/4 51/13 52/10 55/5 56/3 58/15 58/25 60/4</p>	<p>60/12 61/17 62/10 63/22 63/23 69/13 69/20 70/12 73/1 73/16 73/19 74/3 74/11 78/8 79/17 80/3 81/23 82/24 83/15</p> <p>Bye [1] 83/24</p> <hr/> <p>C</p> <p>call [2] 1/6 75/5</p> <p>called [5] 2/15 5/17 9/5 43/20 75/13</p> <p>came [13] 7/9 7/11 9/25 28/4 33/17 34/3 34/23 39/5 42/25 53/18 55/5 56/2 68/6</p> <p>can [84] 1/3 1/5 1/12 1/18 1/25 7/23 8/24 9/23 12/2 13/2 17/8 20/7 21/7 22/3 22/4 22/5 22/15 22/23 25/3 25/13 30/10 30/16 30/23 34/7 34/22 40/4 40/17 42/5 44/9 45/16 47/8 47/10 47/18 48/9 48/10 51/14 51/22 52/15 53/5 53/11 54/4 54/14 54/19 54/25 54/25 55/3 55/6 55/9 55/14 56/16 56/25 58/2 59/5 59/6 59/9 59/12 59/17 61/2 61/3 61/4 61/6 61/7 61/15 62/16 62/17 62/22 63/5 63/7 63/14 63/16 66/14 72/16 73/22 74/5 74/11 75/10 76/1 76/8 77/8 79/14 80/20 81/23 83/4 83/16</p> <p>can't [28] 7/12 9/4 11/12 11/18 11/24 12/21 12/25 13/3 24/5 25/12 34/4 38/13 39/23 46/10 46/18 53/4 53/17 54/9 56/5 58/24 59/18 61/11 61/20 62/11 62/14 65/23 70/22 75/14</p> <p>Canada [1] 12/24</p> <p>cannot [4] 11/25 37/6 52/5 66/10</p> <p>career [1] 3/15</p> <p>careful [1] 44/18</p> <p>careless [4] 60/15 60/23 61/1 61/9</p> <p>carried [2] 67/2 68/16</p> <p>case [69] 1/19 2/18 5/24 8/3 8/3 8/5 8/8 8/10 10/19 11/7 11/21 14/10 15/10 17/16 19/10 20/2 20/3 21/7 21/12 21/13 21/13 21/15 21/17 21/18</p>	<p>21/24 23/1 23/5 23/7 24/21 25/20 25/24 26/2 27/13 27/22 29/4 29/13 29/16 35/10 37/12 41/4 44/1 44/2 45/13 46/21 47/12 47/20 47/21 47/25 48/3 48/5 48/7 48/13 49/7 49/21 49/22 50/17 51/10 51/14 51/17 52/11 53/14 58/15 67/17 70/16 76/4 76/18 77/13 78/15 79/15</p> <p>caseload [3] 3/21 6/17 10/13</p> <p>cases [55] 4/9 4/17 5/1 5/1 5/19 5/20 5/20 6/12 6/18 7/19 7/20 7/21 7/23 8/23 10/3 10/5 11/4 11/10 11/13 11/15 11/16 11/18 11/20 11/25 12/2 14/1 14/9 14/19 14/20 14/24 15/2 15/24 17/23 21/19 22/17 22/20 22/24 23/3 24/12 26/10 28/14 32/18 32/22 37/9 38/20 39/24 40/1 42/25 43/17 44/1 47/20 68/2 75/4 82/20 82/24</p> <p>casework [1] 5/3</p> <p>cash [11] 5/21 23/5 23/24 23/25 34/25 35/4 35/21 36/1 36/6 49/8 49/9</p> <p>Cassidy [3] 69/2 70/9 74/2</p> <p>Catherine [3] 9/5 9/10 9/14</p> <p>caused [2] 16/4 50/24</p> <p>cent [6] 18/25 26/16 28/12 30/5 30/5 43/4</p> <p>certain [1] 35/12</p> <p>certainly [5] 16/23 32/12 55/22 75/6 83/15</p> <p>challenging [6] 7/20 7/21 7/23 7/24 7/25 19/11</p> <p>chance [1] 26/16</p> <p>change [6] 16/17 25/10 37/1 40/18 40/20 40/22</p> <p>changed [2] 5/23 36/12</p> <p>changes [1] 40/16</p> <p>charge [1] 9/13</p> <p>charged [1] 82/17</p> <p>charges [3] 11/22 27/19 49/4</p>	<p>charging [5] 4/10 4/12 10/21 22/14 58/21</p> <p>check [3] 1/25 64/15 73/4</p> <p>checked [2] 60/18 67/14</p> <p>checking [1] 64/12</p> <p>child [2] 45/25 46/1</p> <p>chronology [2] 66/3 66/7</p> <p>Churchard [3] 9/6 9/10 9/14</p> <p>civil [2] 74/25 75/16</p> <p>clarification [1] 3/7</p> <p>clarify [3] 30/3 47/13 57/15</p> <p>clarifying [1] 52/4</p> <p>clash [1] 14/10</p> <p>clause [3] 41/19 42/16 42/23</p> <p>clear [3] 18/8 73/10 80/22</p> <p>clearly [2] 50/24 81/16</p> <p>clerk [5] 10/16 13/25 48/18 60/4 60/12</p> <p>clerks [4] 7/9 10/10 10/12 10/14</p> <p>client [3] 18/20 22/4 22/11</p> <p>clients [1] 19/8</p> <p>close [2] 27/23 49/5</p> <p>Code [19] 4/13 4/16 4/19 25/25 26/6 26/7 26/9 26/12 27/4 29/24 31/8 31/20 31/22 32/11 32/14 33/16 33/24 34/3 34/5</p> <p>Colin [3] 69/5 70/10 74/2</p> <p>collaborate [2] 17/9 33/19</p> <p>collaboration [3] 14/3 16/22 17/6</p> <p>collaborative [4] 15/3 15/6 16/11 16/25</p> <p>colleague [2] 42/3 42/5</p> <p>colleagues [1] 41/17</p> <p>come [10] 4/20 17/22 22/21 23/6 34/7 43/12 43/18 55/9 72/10 76/1</p> <p>comes [1] 15/15</p> <p>coming [1] 62/7</p> <p>comment [3] 12/2 73/25 74/1</p> <p>commercial [3] 41/17 42/4 82/6</p> <p>Commission [1] 38/6</p> <p>committal [4] 70/14 76/14 76/16 77/11</p> <p>common [1] 43/5</p> <p>communicate [2]</p>	<p>15/23 81/5</p> <p>communication [1] 81/1</p> <p>company [3] 15/20 42/3 82/6</p> <p>compare [3] 59/6 59/17 69/15</p> <p>compensation [1] 51/2</p> <p>complete [1] 72/20</p> <p>completely [1] 4/14</p> <p>complicated [1] 8/8</p> <p>comply [1] 19/4</p> <p>compulsory [3] 45/17 45/20 45/22</p> <p>computer [12] 15/15 17/17 19/18 20/1 36/16 36/23 37/10 37/20 37/25 38/1 43/25 81/25</p> <p>computerised [1] 34/18</p> <p>conceded [1] 50/9</p> <p>conceive [1] 43/17</p> <p>concentration [1] 36/21</p> <p>concerned [2] 16/23 59/1</p> <p>concerns [2] 38/18 67/3</p> <p>concludes [2] 83/2 83/19</p> <p>conclusion [4] 50/14 73/14 74/8 74/9</p> <p>conference [2] 71/5 79/13</p> <p>confirm [1] 47/22</p> <p>confirming [5] 68/20 69/9 70/4 70/20 73/15</p> <p>consider [2] 46/5 49/25</p> <p>consideration [1] 29/19</p> <p>considering [1] 25/23</p> <p>consulted [1] 42/13</p> <p>contained [1] 66/20</p> <p>contents [1] 2/7</p> <p>contract [1] 77/23</p> <p>contractual [2] 41/10 42/14</p> <p>control [1] 62/13</p> <p>conversation [3] 70/10 70/24 74/2</p> <p>conversations [1] 14/7</p> <p>convicted [1] 48/19</p> <p>conviction [15] 26/15 26/20 27/6 27/12 27/17 27/22 28/7 28/9 31/11 31/14 48/8 48/24 50/15 50/25 68/17</p> <p>copies [1] 34/4</p>
---	--	---	--	--

<p>C</p> <p>copy [6] 1/20 26/8 56/14 57/20 68/10 77/8</p> <p>Core [2] 48/1 83/4</p> <p>corporate [1] 41/17</p> <p>correct [11] 1/22 2/9 2/21 3/11 3/12 3/17 29/15 52/12 53/4 64/20 83/21</p> <p>correcting [1] 63/24</p> <p>correction [1] 2/24</p> <p>correctly [2] 63/3 65/12</p> <p>corroborate [1] 50/5</p> <p>cost [1] 42/20</p> <p>could [36] 6/13 7/20 7/21 8/11 15/1 16/12 17/20 26/21 35/24 36/19 38/23 41/21 42/18 43/2 43/10 43/12 44/16 45/8 46/12 46/17 50/1 51/8 56/8 56/10 56/20 57/4 59/21 59/23 59/25 63/3 65/12 68/16 72/10 78/8 80/7 81/11</p> <p>couldn't [7] 21/23 24/14 43/17 45/22 46/11 46/12 46/18</p> <p>counsel [15] 22/6 56/1 70/13 70/15 70/19 70/22 71/3 71/6 71/22 72/2 72/9 72/11 73/7 79/10 79/14</p> <p>counsel's [1] 71/24</p> <p>count [1] 54/19</p> <p>counter [2] 48/18 60/1</p> <p>countervailing [2] 29/6 29/13</p> <p>counts [2] 48/19 48/21</p> <p>County [1] 74/20</p> <p>course [3] 12/4 30/25 43/13</p> <p>courses [1] 46/15</p> <p>court [9] 18/24 48/6 48/15 50/10 50/13 51/7 56/18 58/7 76/19</p> <p>courts [1] 66/1</p> <p>covered [2] 22/13 55/23</p> <p>CPD [3] 45/4 45/6 45/9</p> <p>created [4] 35/5 36/1 36/6 51/25</p> <p>creating [1] 35/18</p> <p>crime [1] 26/18</p> <p>criminal [43] 3/19 3/23 5/1 5/6 5/7 5/8 5/12 5/16 6/6 6/20 7/5 9/9 13/6 13/17 15/7</p>	<p>17/11 18/4 20/12 22/8 26/1 27/10 30/17 32/12 33/23 37/2 37/15 40/4 43/5 43/13 44/22 45/18 48/7 49/3 50/4 50/10 55/22 81/3 81/19 82/3 82/8 82/10 82/11 83/1</p> <p>Crown [19] 4/13 4/17 4/19 25/25 26/6 26/8 26/9 27/4 29/25 31/9 31/20 31/22 32/11 32/14 33/16 34/3 34/5 48/15 76/19</p> <p>culture [3] 80/23 81/4 81/10</p> <p>current [3] 30/15 31/5 32/8</p> <p>D</p> <p>data [45] 22/20 22/24 35/3 36/9 36/9 36/11 36/15 36/22 37/10 38/19 38/20 40/6 40/9 41/6 41/6 41/10 41/21 42/18 43/9 43/14 43/19 43/20 43/22 43/24 44/3 44/8 44/11 44/12 44/14 46/7 50/3 52/23 66/13 66/20 67/11 67/14 67/21 68/20 69/10 69/14 70/1 70/5 71/8 73/15 77/24</p> <p>date [5] 38/9 45/24 53/1 53/23 54/23</p> <p>dated [5] 2/1 30/13 57/9 68/24 69/1</p> <p>dates [1] 7/12</p> <p>day [5] 9/8 9/8 45/25 46/2 46/12</p> <p>days [2] 45/5 53/2</p> <p>deal [5] 7/21 8/11 13/7 15/1 44/20</p> <p>dealing [4] 8/9 14/24 41/16 75/19</p> <p>dealings [3] 9/14 9/15 9/17</p> <p>dealt [3] 2/18 4/18 42/1</p> <p>December [2] 30/14 30/22</p> <p>December '97 [1] 30/22</p> <p>decided [1] 49/3</p> <p>decision [7] 2/13 18/7 22/10 33/12 50/19 50/21 58/21</p> <p>decisions [4] 2/20 4/10 4/12 22/14</p> <p>decreased [1] 13/8</p> <p>default [1] 29/11</p> <p>defect [1] 50/1</p> <p>defence [9] 18/15</p>	<p>19/7 19/11 27/21 37/12 52/1 56/3 58/9 77/14</p> <p>defendant [3] 41/5 58/16 68/1</p> <p>defendants [1] 12/1</p> <p>defending [1] 3/22</p> <p>definitely [5] 21/4 47/24 59/4 71/25 73/21</p> <p>delay [1] 32/22</p> <p>delineation [1] 18/9</p> <p>demonstrated [2] 63/2 65/11</p> <p>denied [1] 49/18</p> <p>Denise [1] 74/19</p> <p>department [9] 5/18 13/11 14/11 14/21 69/8 69/12 69/25 71/18 82/12</p> <p>depend [1] 58/14</p> <p>depended [4] 24/21 36/15 36/22 49/11</p> <p>depends [1] 58/9</p> <p>Derry [1] 74/20</p> <p>describe [2] 16/7 16/10</p> <p>describing [1] 29/2</p> <p>deserves [1] 51/2</p> <p>designed [1] 34/19</p> <p>desk [1] 10/1</p> <p>detailed [1] 83/11</p> <p>details [1] 67/8</p> <p>development [2] 45/2 45/8</p> <p>did [62] 3/20 4/9 4/15 4/19 5/2 5/4 7/9 7/13 8/17 8/19 8/25 9/7 10/4 10/8 10/15 10/15 10/16 11/19 13/3 14/14 15/11 16/17 18/9 19/3 21/5 21/12 22/8 24/8 30/6 39/18 41/15 42/22 42/24 43/9 47/18 47/24 49/18 49/25 57/15 58/24 58/25 66/24 67/8 68/8 70/15 71/25 72/1 73/14 73/20 74/8 74/21 77/15 78/10 79/9 79/21 80/7 80/18 81/5 82/2 82/21 82/24 82/24</p> <p>didn't [34] 9/16 14/14 14/18 15/2 15/22 16/19 20/5 22/21 27/10 32/5 33/18 34/14 41/25 44/3 44/6 44/12 44/14 44/17 45/13 51/2 65/3 68/4 71/6 71/14 77/20 78/14 79/3 79/5 80/1 80/4 80/5 80/6 80/9 82/19</p>	<p>didn't I [1] 14/14</p> <p>difference [3] 18/11 49/10 49/12</p> <p>different [16] 10/10 11/4 14/24 19/10 23/2 26/24 26/25 35/8 35/9 41/1 54/25 56/4 61/2 61/11 81/2 83/1</p> <p>differently [1] 20/15</p> <p>difficult [1] 19/4</p> <p>difficulties [2] 39/9 39/12</p> <p>direct [1] 66/19</p> <p>director [5] 5/17 6/6 6/15 10/2 33/8</p> <p>disappointed [1] 32/6</p> <p>disclose [1] 21/22</p> <p>disclosed [7] 19/15 20/4 21/21 38/19 68/11 72/25 78/18</p> <p>disclosure [2] 76/3 76/4</p> <p>discrepancies [5] 49/15 63/12 66/20 66/22 67/1</p> <p>discrepancy [4] 25/2 25/6 59/2 69/17</p> <p>discuss [2] 15/23 17/20</p> <p>discussed [4] 30/1 40/15 69/4 77/22</p> <p>discussion [3] 37/2 40/19 63/8</p> <p>discussions [3] 20/10 47/15 82/20</p> <p>dishonesty [5] 25/6 29/17 30/13 30/19 50/6</p> <p>dismissed [1] 48/25</p> <p>disprove [1] 77/17</p> <p>distribution [1] 5/22</p> <p>Division [2] 48/7 50/11</p> <p>do [54] 2/9 5/24 6/8 12/5 13/5 14/22 15/21 16/1 16/2 16/4 16/21 16/24 20/14 25/10 26/4 30/20 31/24 32/1 33/1 35/6 36/8 37/1 37/14 38/17 39/5 40/11 40/22 41/4 41/13 42/7 44/7 44/25 46/5 51/11 54/18 56/16 61/1 61/19 64/5 64/7 64/7 64/11 64/25 64/25 65/2 65/8 69/23 70/20 72/11 72/15 73/8 78/16 79/5 83/15</p> <p>dockets [5] 63/20 64/12 64/12 64/14 64/15</p> <p>document [33] 30/10 30/12 31/3 31/16</p>	<p>31/17 31/23 32/15 32/16 33/5 33/23 34/7 37/19 52/19 52/24 52/25 53/1 53/6 53/9 53/15 53/19 55/9 57/1 57/7 59/14 59/21 59/22 59/24 60/2 62/22 63/5 72/13 74/15 76/1</p> <p>documentation [13] 20/23 24/4 25/7 49/7 72/22 73/12 78/2 79/5 79/6 79/7 79/23 83/12 83/14</p> <p>documents [21] 1/16 21/3 24/2 24/7 35/18 52/6 52/8 57/2 57/5 59/7 72/16 72/21 75/23 77/3 77/16 78/11 79/7 79/13 79/18 79/25 80/6</p> <p>does [3] 53/24 56/23 66/8</p> <p>doesn't [2] 14/9 34/2</p> <p>dogs [1] 4/3</p> <p>doing [6] 4/16 6/11 10/18 43/16 62/6 72/1</p> <p>don't [58] 4/15 6/16 10/4 10/14 10/15 13/21 14/14 22/15 28/16 33/3 33/3 33/8 33/9 33/11 33/13 33/20 33/24 34/1 34/15 38/13 38/16 39/24 40/10 40/13 41/8 42/15 42/24 46/3 51/12 54/3 54/12 55/2 56/4 56/20 56/22 58/13 60/4 60/12 60/14 61/13 61/23 62/15 63/19 65/16 65/18 65/20 65/23 66/11 67/6 68/1 70/6 70/21 73/16 78/7 80/10 80/10 81/22 83/6</p> <p>done [11] 8/21 20/15 20/22 54/11 55/12 55/13 63/18 65/5 69/4 76/15 76/25</p> <p>door [1] 16/20</p> <p>doubt [4] 39/16 66/21 67/13 73/6</p> <p>down [9] 20/12 20/13 34/7 55/9 56/25 76/1 81/18 82/11 82/19</p> <p>draft [4] 41/24 43/11 76/4 80/11</p> <p>drafted [4] 27/2 33/4 69/7 80/17</p> <p>drafting [2] 26/22 80/16</p> <p>drawn [1] 35/4</p> <p>DSS [1] 23/14</p>
---	--	---	--	--

D	everyone [5] 5/18 5/25 46/24 73/13 83/24	65/12	75/23 76/15 83/3 83/10	Gibson [1] 12/21
due [3] 12/4 25/6 25/6	everything [3] 44/13 76/22 76/23	explained [4] 57/13 57/15 62/24 66/21	firsthand [2] 33/24 34/1	girl [1] 73/3
dunno [1] 65/7	evidence [62] 1/24 3/5 15/14 18/4 18/5 19/13 22/13 25/23 26/14 26/17 27/11 27/13 28/6 28/8 31/10 31/13 32/9 32/13 33/18 37/16 37/20 39/9 40/25 41/3 43/19 46/8 47/13 47/22 49/11 49/21 50/5 50/5 51/7 66/19 66/25 67/7 67/23 70/16 70/17 70/21 71/4 71/7 71/10 71/19 71/20 71/23 72/3 72/18 73/1 73/20 74/7 74/8 74/12 74/22 74/23 78/8 78/17 78/17 78/23 81/22 81/23 83/13	explanation [5] 49/23 60/6 60/14 64/3 66/25	firstly [5] 13/22 22/3 56/16 70/3 76/18	give [4] 10/20 22/4 34/14 55/6
duties [2] 18/23 19/4	explanations [1] 55/6	extent [11] 9/7 9/23 15/21 17/12 19/3 24/8 25/3 28/2 30/3 30/6 80/15	fit [1] 53/13	given [4] 7/19 39/16 61/21 72/20
E	ex [1] 31/1	face [2] 29/4 29/13	five [2] 48/21 53/2	gives [1] 64/2
E4 [1] 31/1	each [5] 2/14 2/20 13/25 14/20 26/17	faced [1] 39/9	focus [5] 15/10 24/8 25/22 27/5 27/8	giving [3] 1/23 1/24 81/22
earlier [8] 33/18 40/18 47/14 63/11 66/3 77/22 78/23 80/11	early [1] 34/11	facilitation [1] 17/7	focused [1] 5/8	glare [1] 30/23
easier [3] 19/6 19/19 59/13	effect [2] 31/23 75/21	fact [7] 8/19 9/14 12/16 21/12 37/11 37/20 46/14	forcing [1] 22/17	go [28] 4/1 13/22 14/4 16/12 16/20 19/20 21/10 27/14 34/16 47/11 51/12 51/22 52/9 55/24 56/10 60/7 60/17 62/8 63/5 63/14 63/16 64/9 64/23 66/23 72/12 75/14 76/19 77/7
eight [1] 12/12	either [8] 8/1 21/22 34/11 41/24 43/24 44/1 47/20 52/1	factor [1] 30/7	forced [1] 49/2	going [11] 3/5 10/6 12/4 21/24 40/6 47/11 48/13 54/6 57/1 62/1 62/3
Elaborate [1] 55/25	employment [3] 13/2 15/5 82/21	factors [4] 29/6 29/14 29/18 30/1	form [4] 24/5 24/6 24/7 51/19	gone [4] 17/23 24/10 36/21 64/20
electronic [1] 52/24	employer [2] 18/20 45/23	facts [1] 27/20	forthcoming [2] 73/23 73/24	good [3] 1/3 46/20 47/8
else [2] 7/6 79/11	employers [1] 30/18	fair [7] 11/19 13/14 14/11 30/20 53/24 67/16 73/23	forward [3] 19/10 56/18 56/19	goes [3] 50/8 60/8 64/2
employees [1] 30/18	employment [3] 13/2 15/5 82/21	fairness [1] 58/15	found [6] 21/23 23/19 23/20 43/24 47/19 50/11	got [14] 9/15 9/16 11/13 23/1 40/13 43/11 55/7 62/10 63/22 64/19 67/24 70/13 73/7 79/12
employer [2] 18/20 45/23	examining [1] 48/3	fall [1] 27/14	fraud [2] 66/19 67/2	grew [1] 13/12
Employment [3] 13/2 15/5 82/21	example [12] 8/21 10/20 15/7 20/9 28/15 32/21 35/7 68/18 71/16 81/14 82/5 82/14	false [4] 5/14 11/22 22/18 40/24	frequency [1] 25/10	Ground [4] 50/10 50/12 50/16 50/16
end [1] 38/24	excluded [1] 61/9	familiar [2] 53/8 53/9	frequently [1] 55/21	grounds [1] 37/23
ended [1] 43/16	exclusively [1] 3/22	far [3] 16/23 17/8 73/22	Friday [2] 83/22 84/3	guess [5] 8/1 14/23 23/8 39/23 45/3
ending [4] 59/10 59/21 59/22 59/24	executives [1] 10/17	feel [2] 16/19 21/5	front [2] 1/15 59/18	guessing [1] 33/14
enough [3] 26/17 55/8 66/25	exhibit [9] 56/11 57/21 57/23 57/23 57/24 58/17 65/19 65/22 76/24	feeling [1] 46/11	Fujitsu [10] 20/19 21/1 41/11 43/3 69/21 73/17 77/24 78/1 78/11 79/22	guidance [1] 26/4
enquiries [1] 78/10	exhibit-bundle [1] 65/19	felt [6] 13/9 16/12 21/20 29/22 55/23 58/18	fund [1] 24/10	
ensure [1] 42/17	exhibits [11] 2/11 23/14 56/9 56/21 61/16 61/18 75/3 75/3 75/24 76/17 77/4	few [3] 11/20 12/5 13/14	fundamentally [1] 36/12	
ensuring [2] 45/6 81/7	existed [3] 44/6 80/1 80/7	fewer [3] 4/7 4/8 32/24	funds [1] 24/10	
entered [1] 49/13	expand [2] 9/23 81/11	file [16] 25/20 25/22 49/2 51/11 52/7 52/11 53/16 53/18 53/22 54/22 55/5 55/5 55/21 59/16 66/18 77/2	further [10] 21/2 27/13 27/14 48/21 51/24 68/15 71/20 72/22 74/15 81/18	
entering [1] 49/24	expect [3] 58/6 58/17 58/19	files [1] 9/25	fundamentals [1] 36/12	
entitled [1] 44/9	expected [2] 13/7 61/17	filtered [2] 20/11 20/13	fun [1] 24/10	
environment [1] 13/21	experience [2] 60/5 60/13	final [3] 18/6 25/20 42/22	funny [1] 24/10	
Er [1] 64/23	explain [8] 20/7 20/19 44/9 51/15 53/11 62/25 63/3	financially [1] 8/2	g	
error [3] 17/17 50/1 57/13		find [5] 19/3 32/18 64/15 75/14 83/14	gather [1] 78/17	
errors [3] 25/7 49/16 49/24		firm [2] 3/19 18/13	gathered [1] 18/4	
essential [1] 49/22		first [26] 1/20 3/6 5/15 6/11 7/5 8/23 9/2 12/19 13/15 25/19 27/9 28/4 33/17 34/3 48/4 48/6 52/13 55/3 55/7 55/20 57/10 59/6	gave [1] 65/17	
essentially [1] 69/6			general [6] 12/6 24/22 24/24 39/2 45/8 82/20	
establish [1] 24/9			generally [1] 14/2	
even [5] 44/16 46/14 70/23 81/3 83/16			generated [1] 38/21	
event [1] 68/6			Gerard [1] 75/13	
events [1] 49/4			get [18] 11/19 13/17 17/24 19/8 24/2 38/9 41/14 41/21 44/16 44/19 62/6 64/1 70/19 70/25 72/9 72/12 79/1 82/16	
eventually [1] 74/21			gets [2] 51/1 77/9	
ever [9] 10/5 10/20 21/5 21/18 22/9 39/18 41/4 43/12 65/5			getting [5] 11/7 11/16 45/4 45/9 78/23	
everybody [2] 7/6 32/20				

H	helps [1] 56/23	58/3 58/21 58/24	7/5 9/2	I saw [2] 41/23 65/21
had... [12] 68/5 69/15 70/10 70/17 76/5 76/21 76/22 77/16 77/24 78/2 78/19 79/19	her [11] 9/17 48/23 49/1 49/16 49/23 50/24 50/24 50/25 51/4 67/12 68/5	62/25 63/14 64/7 64/20 64/25 73/2 73/8	I found [1] 47/19	I say [2] 15/4 33/15
hadn't [3] 10/24 70/18 72/6	here [9] 17/11 22/18 37/18 62/9 68/24 69/23 70/9 71/16 83/7	I	I gave [1] 65/17	I see [1] 2/24
Hamilton [5] 20/3 44/2 47/21 48/7 50/20	herself [2] 31/7 49/11	I advised [2] 27/16 27/21	I get [1] 13/17	I seem [1] 13/17
hand [1] 57/19	hesitate [1] 14/14	I always [2] 26/9 72/1	I got [3] 9/15 9/16 43/11	I sent [1] 21/9
handbag [1] 24/18	hesitated [1] 14/13	I am [2] 3/5 23/11	I guess [5] 8/1 14/23 23/8 39/23 45/3	I should [3] 20/5 25/19 80/2
handling [1] 5/21	hierarchical [1] 81/1	I appreciate [1] 35/22	I had [8] 8/23 12/1 37/12 51/4 66/21 67/12 67/22 70/17	I so [1] 44/12
handwritten [1] 24/6	high [5] 28/12 28/13 39/4 81/20 82/1	I ask [4] 1/11 1/12 19/13 61/6	I hadn't [1] 10/24	I specifically [1] 70/7
hang [1] 40/5	high-quality [1] 39/4	I asked [3] 40/18 73/16 78/7	I have [1] 69/1	I still [1] 72/8
happen [1] 82/21	higher [1] 6/19	I assumed [1] 67/10	I haven't [5] 55/7 62/10 72/20 79/12 81/23	I suspect [1] 33/7
happened [6] 11/12 25/8 25/9 35/10 49/19 82/19	highlight [1] 59/25	I became [1] 7/7	I hope [1] 51/1	I tell [1] 61/15
happening [3] 54/13 60/16 82/25	him [6] 16/12 17/24 21/11 62/12 72/6 72/7	I believe [1] 69/5	I initially [1] 73/18	I think [60] 1/18 2/14 2/18 2/19 2/21 4/8 5/23 6/5 6/11 6/19 7/6 7/8 8/4 10/16 11/9 11/14 11/18 11/19 12/11 12/19 12/20 13/14 14/24 14/25 16/3 24/12 25/8 29/15 29/22 31/2 32/3 32/15 32/23 35/9 38/8 41/16 41/23 43/7 45/3 45/4 45/19 46/20 47/19 47/20 50/21 51/11 52/21 54/3 54/8 56/6 65/2 68/7 68/12 74/13 75/4 75/7 75/23 81/6 82/4 83/19
happy [2] 13/19 59/20	hindsight [2] 17/10 79/25	I believed [1] 68/3	I joined [1] 13/2	I thought [3] 19/6 19/17 78/15
hard [4] 19/7 23/12 24/22 24/25	his [12] 6/14 6/17 9/4 9/13 16/10 16/20 48/16 56/24 57/23 68/23 76/25 80/17	I came [1] 55/5	I just [8] 2/22 26/7 40/2 43/15 44/13 44/15 46/2 70/3	I took [1] 80/11
harm [1] 50/24	history [1] 3/15	I can [13] 1/18 12/2 13/2 21/7 54/19 54/25 54/25 55/3 55/6 61/2 79/14 81/23 83/4	I keep [1] 65/16	I trusted [2] 19/12 19/14
has [10] 34/10 36/21 39/8 43/19 50/24 51/1 52/22 69/4 69/6 73/5	hm [5] 15/19 34/13 40/21 47/17 53/20	I can't [19] 7/12 9/4 11/12 11/18 12/21 24/5 25/12 34/4 38/13 39/23 46/10 46/18 53/4 53/17 54/9 56/5 62/11 70/22 75/14	I knew [2] 34/18 44/12	I turn [2] 48/9 50/17
have [134]	home [1] 49/17	I cannot [1] 37/6	I know [6] 16/2 19/25 33/6 41/14 70/8 71/25	I understand [3] 20/9 47/15 52/19
haven't [6] 55/7 62/10 64/19 72/20 79/12 81/23	Honour [1] 48/16	I could [5] 7/21 46/12 46/17 56/20 72/10	I looked [1] 70/12	I want [10] 13/20 18/10 22/2 44/20 47/13 47/25 48/5 51/6 52/13 59/5
having [4] 32/23 41/22 70/10 76/20	hope [1] 51/1	I couldn't [4] 43/17 46/11 46/12 46/18	I made [1] 2/22	I was [19] 2/11 4/15 6/5 7/6 7/19 11/18 12/16 12/17 14/15 16/23 21/22 26/10 32/3 42/12 42/15 46/13 72/1 76/23 77/6
he [22] 6/10 6/11 6/15 6/16 6/17 6/17 8/25 8/25 10/2 10/3 10/4 10/4 16/11 16/18 33/6 58/4 64/2 69/5 70/18 72/6 76/22 80/18	hoped [2] 46/2 65/25	I dealt [1] 4/18	I make [1] 47/1	I wasn't [4] 40/1 43/13 74/3 79/13
he'd [2] 72/5 76/25	Horizon [68] 15/10 15/11 15/12 20/11 21/8 21/15 21/19 22/20 22/25 24/9 25/1 25/8 25/9 34/9 34/10 34/25 35/10 36/3 36/3 36/6 36/13 36/16 36/23 37/3 37/5 37/8 38/19 38/21 39/10 39/15 40/15 41/2 41/5 41/7 45/13 46/6 46/7 46/9 47/16 49/6 49/12 49/22 49/25 50/5 57/17 66/13 66/20 67/9 67/13 67/20 68/20 69/10 69/15 69/20 70/1 70/5 71/8 71/21 72/19 73/15 75/22 77/19 78/3 78/13 79/8 79/20 81/8 81/17	I did [16] 3/20 4/15 4/19 5/4 11/19 14/14 39/18 41/15 42/24 47/24 58/24 66/24 70/15 71/25 79/9 80/7	I may [1] 1/6	I went [1] 8/23
he's [2] 31/19 58/3	horrible [1] 45/23	I didn't [16] 9/16 20/5 41/25 44/6 44/12 44/14 44/17 65/3 71/6 77/20 78/14 79/3 80/1 80/4 80/5 80/6	I mean [1] 14/22	I worked [2] 73/2 73/8
head [3] 5/17 6/6 31/18	house [4] 18/18 18/22 19/5 22/1	I do [5] 2/9 14/22 41/13 65/2 73/8	I might [2] 55/24 67/24	I would [31] 20/17 27/17 29/22 29/24 31/20 46/10 46/17 53/15 55/4 61/17 62/2 65/25 66/18 67/13 67/23 68/5 70/13 70/18 71/1 71/4 72/3 72/4 73/7 74/3 76/15 76/20 76/24 77/1 77/20 79/9 80/8
heading [1] 30/14	how [35] 4/6 5/12 7/3 10/8 11/21 15/23 15/25 16/7 16/10 16/17 17/10 20/19 26/24 32/1 35/21 35/25 36/1 36/23 37/3 40/19 52/23 53/11 53/12 55/19 56/23	I don't [31] 4/15 6/16 10/4 10/14 10/15 14/14 22/15 28/16 33/3 33/3 33/8 33/9 34/1 38/13 40/10 41/8 42/15 42/24 46/3 55/2 56/22 61/13 62/15 65/16 65/18 65/23 68/1 70/6 70/21 78/7 83/6	I moved [1] 15/4	I wouldn't [2] 21/24 79/3
hear [2] 1/3 47/8		I dunno [1] 65/7	I now [1] 79/25	
heard [3] 39/8 43/19 81/21		I even [1] 46/14	I now use [1] 3/13	
hearing [3] 59/25 62/20 84/2		I fairly [1] 74/12	I only [1] 43/24	
Heath [11] 6/5 6/13 6/15 8/18 8/20 8/24 9/12 12/20 16/8 16/13 33/7		I felt [4] 21/20 29/22 55/23 58/18	I originally [2] 73/4 78/5	
held [5] 41/10 59/14 77/16 78/11 79/22		I first [4] 5/15 6/11	I particularly [1] 8/3	
help [4] 15/3 55/8 56/21 82/14			I personally [1] 39/24	
helpful [1] 16/25			I presume [1] 65/2	
helping [2] 10/17 82/14			I read [3] 19/17 20/1 73/11	

I	Inquiry [7] 1/12 1/24 3/5 39/8 43/19 48/2 48/4 insisted [1] 20/17 instead [2] 22/16 63/21 instructions [8] 22/2 22/4 22/6 22/9 70/15 70/22 71/3 72/2 insufficient [2] 31/10 50/7 integrity [10] 19/1 35/20 36/15 36/22 38/18 71/8 77/18 78/2 78/13 79/20 intended [2] 45/17 45/20 intentionally [1] 67/2 interest [9] 28/3 28/19 29/1 29/9 29/12 29/21 30/7 32/18 50/12 Internal [1] 30/12 interview [23] 23/18 51/20 52/18 53/3 53/8 53/13 53/18 54/16 55/2 55/12 55/16 55/17 55/20 56/14 57/21 58/10 58/22 61/10 61/12 65/9 67/12 68/5 77/14 interviews [1] 51/25 into [8] 8/13 8/17 16/20 29/19 53/13 61/3 65/19 65/22 introduce [2] 48/13 57/7 introduced [2] 34/11 37/5 introducing [1] 51/14 introduction [5] 22/25 34/8 36/13 37/3 40/15 investigate [1] 67/19 investigating [5] 23/16 51/16 70/17 72/4 76/11 investigation [14] 2/15 18/6 24/8 25/3 51/19 54/9 61/13 62/14 69/18 77/1 78/16 78/20 78/21 80/17 Investigations [4] 13/18 31/18 33/5 52/3 Investigative [1] 13/11 investigator [9] 17/24 18/1 19/16 21/9 53/16 55/24 59/3 72/17 73/5 investigators [7] 9/25 13/15 18/3 21/2 21/6 41/20 68/16	involve [1] 30/19 involved [14] 3/22 4/25 8/2 8/4 24/15 24/17 25/18 37/9 38/14 41/4 43/23 44/5 61/21 80/15 involvement [5] 9/8 25/19 61/19 69/13 77/22 involving [1] 37/12 Ireland [2] 69/2 75/1 is [86] isn't [1] 61/1 issue [10] 17/17 17/18 21/8 21/20 50/6 67/25 68/1 68/2 68/4 74/16 issues [10] 5/6 8/23 12/1 17/14 25/11 39/25 71/14 81/7 82/20 82/24 it [205] it's [60] 1/18 4/8 8/8 12/3 13/22 15/20 15/21 19/6 23/9 23/12 24/21 24/22 25/14 28/20 29/22 30/10 30/12 30/13 32/19 32/23 33/4 37/17 38/8 38/10 40/8 45/19 45/25 48/4 48/9 51/9 52/10 52/14 52/23 54/17 54/20 56/8 57/2 59/8 59/8 60/5 60/6 60/13 60/14 60/15 60/17 60/23 60/25 61/8 64/20 65/9 68/11 74/16 74/17 74/17 75/10 77/8 80/9 80/21 82/21 83/7 its [1] 70/1 itself [2] 17/19 36/4	jury [1] 48/17 just [42] 1/25 2/9 2/22 3/6 6/13 10/5 12/3 13/20 15/3 15/9 16/2 19/20 22/23 24/21 26/7 28/25 30/3 40/2 43/15 44/13 44/15 44/18 44/20 45/9 46/2 47/1 47/12 47/22 51/14 53/11 57/5 59/6 60/14 62/19 63/14 65/3 70/3 73/10 74/5 75/8 81/11 82/18 justice [3] 50/12 70/10 74/3 Justice' [1] 69/5	38/10 38/11 83/16 later [7] 5/17 5/23 8/15 11/11 22/21 43/1 46/3 latter [1] 50/13 law [33] 3/19 5/7 5/12 5/16 6/6 6/20 7/5 9/9 13/6 13/18 15/5 15/7 17/12 18/4 20/12 22/8 30/17 32/12 33/23 37/2 38/5 40/4 43/6 44/22 45/18 55/22 81/3 81/19 82/3 82/8 82/10 82/22 83/1 lawyer [27] 6/10 6/21 6/23 6/24 7/6 7/7 7/8 7/11 7/13 7/19 8/10 9/18 10/10 10/15 10/20 10/23 10/25 11/1 13/25 14/25 27/10 31/17 31/19 37/8 42/11 44/7 55/21 lawyers [13] 5/11 5/16 7/3 7/3 12/10 12/12 33/6 33/10 33/22 44/22 81/18 82/11 82/12 lay [2] 22/4 22/11 lead [1] 40/16 leader [5] 5/18 6/1 10/1 17/5 45/10 leading [1] 25/2 learning [1] 15/24 leave [4] 11/11 61/4 62/16 63/9 led [3] 33/1 33/16 71/7 left [12] 12/11 12/18 12/20 13/1 13/1 18/1 57/11 57/19 60/9 60/21 62/20 62/22 left-hand [1] 57/19 legal [5] 10/17 41/20 62/7 82/4 82/9 lens [1] 31/21 less [2] 4/7 30/9 lesser [1] 49/13 Let [2] 17/16 24/24 let's [7] 15/9 15/10 16/8 19/20 66/13 66/16 68/12 letter [1] 28/24 level [6] 6/19 9/19 16/22 20/10 41/24 47/16 like [18] 5/6 8/6 10/17 14/10 24/18 24/21 28/17 29/2 32/17 45/7 50/21 52/21 73/24 74/15 75/13 82/22 83/9 83/17 likelihood [3] 27/18 28/10 68/17
	J			
	job [6] 6/8 6/14 6/21 76/15 76/25 77/11 Johnston [1] 74/19 joined [12] 4/20 6/3 6/11 6/21 7/5 7/9 7/11 9/3 13/2 22/17 22/19 26/5 joining [1] 5/11 Joyce [1] 12/21 Judge [1] 48/16 judgment [1] 48/6 judgments [2] 20/2 81/16 July [3] 54/23 55/13 66/6 June [6] 53/1 53/23 53/25 55/12 66/4 66/5 junior [8] 7/11 10/10 10/12 10/15 10/17 10/20 10/23 13/25	knowing [1] 19/25 knowledge [7] 2/8 3/1 33/25 34/1 43/5 63/2 65/11 known [2] 20/5 20/16		
	K			
	keep [2] 15/2 65/16 kept [4] 35/5 35/25 49/10 81/4 key [1] 60/15 keystroke [1] 49/24 kind [9] 5/24 24/4 43/17 45/23 46/13 46/15 62/13 73/3 82/11 kinds [1] 72/23 knew [3] 34/18 44/12 81/16 Knight [1] 12/22 know [74] 1/10 6/16 10/4 11/2 16/1 16/2 19/25 20/5 28/15 28/16 32/1 33/3 33/3 33/6 33/8 33/12 33/13 34/2 38/13 38/16 40/13 41/13 41/14 42/2 42/15 42/24 44/6 44/14 44/17 45/13 47/24 49/18 51/3 54/3 54/12 55/2 56/4 56/16 56/20 56/22 60/7 60/17 61/14 61/23 62/15 63/19 64/7 64/25 65/16 65/18 65/20 65/23 66/11 66/12 70/6 70/8 70/21 71/7 71/17 71/25 72/13 73/16 77/8 78/7 80/1 80/1 80/4 80/5 80/6 80/9 80/10 80/10 81/22 82/2 larger [1] 31/1 last [5] 2/12 3/10 12/16 24/24 31/3 late [5] 34/11 38/9	keep [2] 15/2 65/16 kept [4] 35/5 35/25 49/10 81/4 key [1] 60/15 keystroke [1] 49/24 kind [9] 5/24 24/4 43/17 45/23 46/13 46/15 62/13 73/3 82/11 kinds [1] 72/23 knew [3] 34/18 44/12 81/16 Knight [1] 12/22 know [74] 1/10 6/16 10/4 11/2 16/1 16/2 19/25 20/5 28/15 28/16 32/1 33/3 33/3 33/6 33/8 33/12 33/13 34/2 38/13 38/16 40/13 41/13 41/14 42/2 42/15 42/24 44/6 44/14 44/17 45/13 47/24 49/18 51/3 54/3 54/12 55/2 56/4 56/16 56/20 56/22 60/7 60/17 61/14 61/23 62/15 63/19 64/7 64/25 65/16 65/18 65/20 65/23 66/11 66/12 70/6 70/8 70/21 71/7 71/17 71/25 72/13 73/16 77/8 78/7 80/1 80/1 80/4 80/5 80/6 80/9 80/10 80/10 81/22 82/2 larger [1] 31/1 last [5] 2/12 3/10 12/16 24/24 31/3 late [5] 34/11 38/9		
	L			
	larger [1] 31/1 last [5] 2/12 3/10 12/16 24/24 31/3 late [5] 34/11 38/9			

<p>L</p> <p>likely [4] 34/10 66/9 71/19 77/15</p> <p>limited [5] 2/16 5/20 11/20 49/6 81/1</p> <p>line [1] 8/12</p> <p>Lisa [3] 48/1 48/17 50/22</p> <p>Lisa Brennan [2] 48/1 48/17</p> <p>Lisahally [21] 23/15 24/3 24/7 60/8 60/18 69/2 70/8 71/17 73/17 74/20 74/22 74/23 74/24 74/25 75/4 75/7 75/8 75/12 75/17 75/19 75/25</p> <p>list [5] 56/9 74/17 75/3 75/15 75/24</p> <p>listed [3] 77/4 77/8 77/9</p> <p>listen [2] 52/3 63/13</p> <p>little [5] 5/4 9/12 14/2 82/13 82/15</p> <p>Liverpool [2] 48/16 71/6</p> <p>locate [1] 83/15</p> <p>long [4] 12/3 23/12 37/17 81/8</p> <p>longer [3] 62/2 62/3 66/5</p> <p>look [20] 10/5 12/5 13/20 18/10 21/2 31/15 48/5 50/17 56/8 59/5 60/20 66/13 66/14 66/17 68/12 72/3 75/2 75/5 76/20 81/20</p> <p>looked [7] 21/1 45/12 55/4 58/20 70/12 76/20 82/11</p> <p>looking [10] 17/10 19/25 21/10 38/24 46/1 51/6 75/9 75/11 76/16 76/17</p> <p>looks [3] 52/21 73/24 75/12</p> <p>lot [6] 16/11 20/3 32/21 34/14 74/23 75/3</p> <p>lots [2] 41/22 74/23</p> <p>love [3] 71/1 71/2 71/4</p> <p>loves [1] 46/16</p> <p>low [1] 28/11</p> <p>lunch [1] 14/5</p>	<p>49/23 53/25 57/14 63/18 65/19 65/22</p> <p>mail [6] 4/18 5/20 8/5 8/7 28/23 32/22</p> <p>main [1] 21/7</p> <p>mainly [2] 11/19 75/12</p> <p>maintain [1] 35/16</p> <p>make [7] 47/1 58/21 76/22 76/25 77/9 78/10 79/21</p> <p>makes [2] 20/6 20/7</p> <p>making [4] 2/19 33/12 75/18 83/10</p> <p>man [1] 9/3</p> <p>managed [2] 6/16 16/5</p> <p>management [3] 8/12 16/7 16/10</p> <p>manager [5] 18/6 26/23 45/11 78/20 78/21</p> <p>managerial [1] 6/19</p> <p>Managers [1] 2/17</p> <p>many [9] 4/6 5/12 7/3 8/19 10/8 23/2 56/23 58/3 58/24</p> <p>March [2] 57/10 68/24</p> <p>mark [2] 50/13 73/6</p> <p>married [1] 3/13</p> <p>MARY [3] 1/8 1/14 85/2</p> <p>material [11] 19/15 20/4 21/9 21/20 37/25 59/1 76/10 76/11 76/12 77/5 78/18</p> <p>maternity [1] 11/11</p> <p>matter [2] 17/21 69/4</p> <p>matters [3] 5/5 42/14 75/20</p> <p>may [12] 1/6 24/25 26/24 29/19 48/23 52/9 63/20 66/8 75/8 77/14 79/19 81/21</p> <p>maybe [8] 28/15 28/16 28/17 28/21 28/22 28/22 28/23 33/11</p> <p>me [26] 1/4 7/18 13/9 17/16 19/16 20/4 20/6 24/24 30/24 36/20 37/17 47/9 53/17 53/18 54/24 54/24 59/16 62/11 65/17 68/11 69/3 69/13 72/11 76/13 79/24 82/14</p> <p>mean [3] 14/22 64/5 64/11</p> <p>means [2] 46/23 54/24</p> <p>meant [2] 32/16 45/25</p>	<p>mechanics [1] 39/20</p> <p>member [1] 13/25</p> <p>members [1] 45/17</p> <p>memo [4] 68/25 70/23 71/1 73/25</p> <p>memorandum [6] 51/13 67/3 67/8 68/11 68/23 69/11</p> <p>mens [1] 26/19</p> <p>mens rea [1] 26/19</p> <p>mentioned [1] 58/14</p> <p>message [2] 39/2 39/5</p> <p>met [1] 26/2</p> <p>metadata [3] 52/22 53/21 54/21</p> <p>meticulous [1] 73/9</p> <p>might [15] 5/21 6/18 19/8 24/17 28/18 28/25 30/1 35/8 35/11 40/2 44/17 55/24 56/1 59/13 67/24</p> <p>Mike [9] 6/5 6/13 6/15 8/18 8/20 8/24 9/12 12/20 33/7</p> <p>mind [1] 34/5</p> <p>minimal [1] 9/21</p> <p>minutes [1] 46/23</p> <p>misremembered [1] 2/22</p> <p>mistake [3] 57/15 63/19 63/24</p> <p>mistakes [2] 63/4 65/13</p> <p>mix [1] 5/22</p> <p>mixture [2] 5/19 6/12</p> <p>Mm [21] 11/5 12/9 14/8 15/11 15/16 15/19 16/9 26/3 27/7 28/1 34/13 38/2 38/12 40/21 43/21 44/24 47/17 53/20 71/15 77/25 80/13</p> <p>Mm-hm [5] 15/19 34/13 40/21 47/17 53/20</p> <p>moderate [1] 28/13</p> <p>moment [3] 51/22 52/8 57/5</p> <p>Monday [1] 82/23</p> <p>money [2] 41/22 49/19</p> <p>months' [1] 48/22</p> <p>Moran [1] 75/13</p> <p>more [45] 5/24 6/18 6/19 7/19 7/21 7/23 7/25 8/1 8/2 8/5 8/8 8/11 10/16 10/18 11/7 11/13 11/13 11/15 11/16 12/6 13/25 15/5 16/11 16/18 16/18 16/21 16/25 17/5 17/8 19/4 19/11 26/16 28/11 32/18 32/19</p>	<p>32/23 32/24 45/6 45/8 49/9 60/10 62/8 66/9 80/22 81/9</p> <p>morning [6] 1/3 47/8 47/14 47/14 82/23 83/18</p> <p>most [1] 14/15</p> <p>mostly [1] 18/15</p> <p>move [4] 18/10 22/15 46/21 62/16</p> <p>moved [1] 15/4</p> <p>moving [2] 31/14 34/8</p> <p>MR [21] 1/9 16/8 16/13 47/2 60/3 60/22 60/25 61/8 63/9 63/17 64/2 64/6 64/13 64/18 64/24 65/4 68/24 74/11 80/11 83/20 85/4</p> <p>Mr Bradshaw [13] 60/3 60/22 60/25 61/8 63/17 64/2 64/6 64/13 64/18 64/24 65/4 68/24 74/11</p> <p>Mr Bradshaw's [2] 63/9 80/11</p> <p>Mr Heath [2] 16/8 16/13</p> <p>MR STEVENS [4] 1/9 47/2 83/20 85/4</p> <p>Mrs [5] 1/7 1/10 3/8 73/11 83/10</p> <p>Mrs Teresa [1] 3/8</p> <p>Mrs Williamson [4] 1/7 1/10 73/11 83/10</p> <p>Ms [17] 48/8 49/4 49/15 49/22 57/13 62/24 64/3 64/9 64/17 64/22 65/1 65/6 65/10 67/1 67/10 68/4 71/14</p> <p>Ms Brennan [13] 49/4 49/15 57/13 62/24 64/3 64/9 64/22 65/6 65/10 67/1 67/10 68/4 71/14</p> <p>Ms Brennan's [3] 48/8 49/22 65/1</p> <p>much [13] 5/7 9/17 11/9 15/5 16/19 19/11 32/23 33/10 33/19 42/1 62/8 82/17 83/9</p> <p>must [2] 4/15 49/23</p> <p>my [30] 1/10 1/14 3/12 3/13 7/21 8/21 17/22 25/22 27/18 31/8 32/16 36/20 41/17 54/6 62/10 68/7 68/15 69/10 70/15 70/22 70/23 71/1 71/2 72/1 72/3 72/21 76/15 77/11 78/24 83/2</p> <p>myself [2] 55/22 76/18</p>	<p>N</p> <p>name [10] 1/10 1/12 1/14 3/10 3/13 3/14 9/4 24/5 42/5 52/25</p> <p>namely [1] 36/23</p> <p>names [1] 12/1</p> <p>National [3] 2/15 18/6 78/20</p> <p>nature [1] 16/2</p> <p>necessarily [1] 33/10</p> <p>necessary [11] 43/3 58/12 71/22 72/8 78/4 78/9 78/14 79/4 79/15 79/17 82/8</p> <p>need [10] 13/21 22/15 34/15 40/7 51/12 55/15 67/6 70/20 72/11 72/18</p> <p>needed [4] 42/2 44/16 44/18 79/10</p> <p>negotiated [2] 41/15 42/10</p> <p>never [2] 39/15 46/13</p> <p>new [2] 36/6 52/4</p> <p>next [4] 31/15 54/6 59/15 77/11</p> <p>nice [1] 9/15</p> <p>Nicola [1] 12/22</p> <p>night [2] 2/12 12/16</p> <p>nil [1] 83/7</p> <p>no [36] 6/5 22/12 25/12 30/15 31/1 31/5 32/7 33/3 33/20 34/24 35/10 35/10 37/22 39/7 39/13 40/10 40/11 40/13 41/8 42/6 43/24 44/6 46/6 50/4 55/6 60/5 60/13 65/14 65/14 66/21 71/10 72/20 77/20 78/14 80/17 83/6</p> <p>nodded [3] 3/25 35/2 36/18</p> <p>non [1] 76/10</p> <p>non-sensitive [1] 76/10</p> <p>nor [1] 61/15</p> <p>normal [2] 58/5 63/15</p> <p>normally [2] 30/16 69/4</p> <p>Northern [2] 69/2 75/1</p> <p>not [60] 2/21 10/4 11/9 14/9 14/22 16/22 20/11 20/16 21/21 26/2 27/3 27/21 28/12 29/1 31/16 31/19 31/19 32/2 32/15 32/19 33/13 36/19 39/18 42/24 45/16 45/21 47/24 49/18 49/25 51/24 55/23</p>
---	--	---	--	---

<p>N</p> <p>not... [29] 56/3 58/3 60/23 60/25 61/9 62/2 62/4 66/24 67/8 67/11 67/21 67/22 68/11 69/3 69/6 69/20 70/3 70/6 72/25 73/23 77/3 77/8 81/5 81/17 82/3 82/7 82/16 82/25 83/13</p> <p>notes [1] 71/5</p> <p>nothing [2] 50/2 54/24</p> <p>notice [1] 69/16</p> <p>noticed [1] 66/18</p> <p>noticing [1] 11/6</p> <p>November [8] 1/1 68/7 69/1 69/10 70/23 71/2 73/18 84/3</p> <p>now [17] 3/4 3/7 3/13 4/20 18/10 19/24 19/25 23/12 26/21 37/14 37/14 39/23 40/6 54/9 60/2 74/10 79/25</p> <p>number [6] 4/2 4/6 11/25 15/8 56/11 75/18</p> <p>Number 37 [1] 56/11</p> <p>numbers [3] 12/8 13/3 13/5</p>	<p>80/24 81/11 81/14 81/14 81/21 82/2</p> <p>Office's [1] 41/9</p> <p>officer [11] 2/15 51/16 54/10 62/5 70/18 72/4 72/10 76/21 77/7 78/16 80/17</p> <p>officer's [2] 76/12 77/2</p> <p>officers [2] 23/16 23/16</p> <p>often [5] 23/13 24/19 29/22 58/21 60/16</p> <p>Oh [2] 23/23 64/11</p> <p>Okay [4] 15/13 17/22 23/8 81/13</p> <p>old [3] 28/15 28/20 48/18</p> <p>on [158]</p> <p>once [1] 14/25</p> <p>one [42] 1/20 2/9 2/14 2/19 3/6 4/8 5/24 8/3 10/10 10/17 12/5 17/22 18/15 19/9 21/7 24/24 28/24 29/22 30/4 30/5 40/11 41/16 44/1 45/19 47/12 47/19 54/11 54/17 55/2 55/4 59/10 59/20 61/16 64/16 65/5 66/1 66/8 67/24 74/15 80/9 82/23 82/23</p> <p>ones [3] 55/6 61/14 75/1</p> <p>only [16] 7/6 9/13 12/2 27/25 28/23 28/25 31/12 42/13 43/24 54/3 62/1 63/22 66/11 66/19 76/3 79/14</p> <p>onto [3] 31/15 49/13 49/25</p> <p>onwards [2] 39/11 66/15</p> <p>open [3] 16/19 43/16 80/24</p> <p>openly [1] 81/5</p> <p>operating [6] 20/17 38/1 38/4 67/9 68/9 78/6</p> <p>opinion [7] 27/2 27/18 27/25 28/2 70/19 72/9 73/7</p> <p>opportunity [2] 46/9 50/22</p> <p>option [1] 79/1</p> <p>or [113]</p> <p>oral [1] 1/24</p> <p>order [10] 12/17 12/25 19/20 23/14 24/3 37/19 55/3 67/16 67/18 74/19</p> <p>orders [1] 21/11</p>	<p>ordinary [2] 18/23 81/18</p> <p>organisation [4] 16/3 39/3 44/19 81/3</p> <p>organisations [2] 17/4 17/6</p> <p>original [1] 72/3</p> <p>originally [2] 73/4 78/5</p> <p>other [20] 2/4 5/3 14/18 14/19 14/20 15/23 17/4 17/5 32/1 33/20 33/21 33/22 37/22 54/16 62/3 63/13 67/15 75/20 81/20 82/12</p> <p>others [2] 29/18 40/1</p> <p>otherwise [3] 24/11 72/18 77/20</p> <p>our [8] 40/5 57/19 59/24 60/21 81/4 82/14 82/18 83/15</p> <p>ourselves [3] 17/15 40/7 81/5</p> <p>out [20] 19/20 25/17 29/18 37/19 39/2 43/24 47/19 49/8 51/10 57/16 59/16 63/1 63/3 63/15 63/21 65/12 67/2 67/3 68/16 83/12</p> <p>over [10] 9/20 10/7 13/5 13/8 16/13 16/17 51/22 60/24 63/16 64/9</p> <p>overarching [1] 31/9</p> <p>oversaw [1] 6/16</p> <p>overseeing [1] 45/1</p> <p>overturned [1] 51/1</p> <p>own [7] 6/17 7/22 15/2 35/15 35/16 80/17 82/18</p>	<p>page [59] [1] 48/10</p> <p>page 6 [2] 25/16 63/7</p> <p>page 7 [6] 25/14 59/10 59/12 59/20 59/22 63/5</p> <p>page 8 [1] 59/23</p> <p>pages [8] 2/2 2/3 2/4 52/18 53/19 54/18 56/23 58/3</p> <p>paid [7] 21/11 23/14 24/2 49/8 57/16 64/19 74/19</p> <p>paper [1] 30/24</p> <p>papers [2] 76/14 76/16</p> <p>paperwork [3] 8/1 23/13 62/11</p> <p>paragraph [15] 13/23 14/4 25/14 25/16 38/24 39/17 48/11 51/9 51/10 66/15 66/17 68/13 68/21 73/11 80/20</p> <p>paragraph 13 [1] 14/4</p> <p>paragraph 18 [1] 13/23</p> <p>paragraph 19 [2] 25/14 25/16</p> <p>paragraph 26 [1] 38/24</p> <p>paragraph 28 [1] 39/17</p> <p>paragraph 286 [1] 48/11</p> <p>paragraph 38 [2] 51/9 51/10</p> <p>paragraph 39 [1] 66/15</p> <p>paragraph 40 [1] 66/17</p> <p>paragraph 58 [2] 68/13 73/11</p> <p>paragraph 70 [1] 68/21</p> <p>paragraph 81 [1] 80/20</p> <p>paraphrasing [1] 37/18</p> <p>Parcelforce [1] 5/21</p> <p>part [6] 41/2 41/23 49/16 50/23 51/4 81/7</p> <p>Participant [1] 48/1</p> <p>Participants [1] 83/4</p> <p>particular [6] 11/7 27/4 27/8 42/16 43/14 79/15</p> <p>particularly [3] 8/3 28/12 75/1</p> <p>partly [1] 14/23</p> <p>party [1] 74/3</p> <p>pass [1] 22/5</p> <p>past [1] 2/16</p> <p>Pathway [1] 41/11</p>	<p>pause [1] 46/21</p> <p>pay [6] 41/22 63/1 63/3 63/14 63/23 65/11</p> <p>paying [1] 63/21</p> <p>payments [1] 34/20</p> <p>peevied [1] 46/11</p> <p>pension [5] 63/1 63/12 63/15 66/19 69/16</p> <p>pensions [2] 60/7 60/17</p> <p>people [27] 5/24 8/21 8/22 10/8 12/18 13/1 13/1 14/17 14/18 14/19 15/8 15/22 24/14 32/2 32/4 33/11 33/12 33/20 35/8 54/12 63/13 81/20 82/1 82/4 82/6 82/8 82/24</p> <p>per [6] 18/25 26/16 28/12 30/5 30/5 43/4</p> <p>perfect [1] 66/16</p> <p>period [3] 7/15 9/4 13/8</p> <p>permitted [1] 49/10</p> <p>person [18] 2/12 2/15 2/19 14/15 16/19 17/25 23/18 24/17 28/16 28/20 28/21 42/13 42/15 46/14 46/16 54/3 66/12 73/4</p> <p>personal [1] 45/7</p> <p>personality [1] 14/10</p> <p>personally [4] 39/24 45/5 61/17 72/8</p> <p>Phipps [1] 48/16</p> <p>phrase [1] 22/3</p> <p>picked [2] 62/12 65/15</p> <p>place [4] 23/10 23/21 70/24 78/8</p> <p>play [1] 76/5</p> <p>played [1] 81/7</p> <p>please [31] 1/13 25/13 26/21 30/10 30/24 37/17 38/23 48/9 48/10 51/9 51/22 52/15 53/5 54/14 56/8 56/10 59/9 59/10 59/22 59/23 60/1 62/22 63/5 63/16 64/9 66/14 68/14 72/12 74/18 76/8 80/20</p> <p>pleased [1] 50/25</p> <p>pm [1] 84/1</p> <p>point [18] 3/7 11/17 21/5 23/8 26/13 29/20 30/4 30/24 32/7 42/11 47/12 52/5 55/25 60/21 68/25 69/23 72/16 75/18</p> <p>pointing [1] 83/11</p>
(31) not... - pointing				

P	pre [3] 21/15 24/9 24/12	38/1 38/4 39/19 40/1 40/3 68/3 68/9 70/6 76/25 78/6	66/1	44/9 45/21 46/18 55/14 61/7 66/21 67/13 71/10
points [5] 26/25 45/4 45/6 45/9 67/15	pre-Horizon [1] 24/9	proportion [1] 7/4	Q	reasonable [2] 27/22 37/23
POL00030659 [1] 30/11	pregnant [1] 9/16	proposal [1] 38/6	qualification [1] 3/18	reassurance [1] 39/21
POL00047320 [4] 52/16 62/18 62/21 63/6	prepared [9] 35/1 35/8 35/11 54/10 55/2 55/7 59/2 76/14 76/21	prosecute [5] 5/19 28/20 30/17 33/13 42/25	qualified [1] 3/16	recall [23] 6/8 7/24 8/24 13/5 13/17 14/22 25/3 25/10 25/12 26/4 34/22 37/1 37/14 39/1 40/4 40/17 40/22 41/4 41/8 42/5 42/7 45/16 52/5
POL00047322 [5] 53/5 59/8 62/17 62/20 62/21	present [1] 9/16	prosecuted [1] 31/12	quality [2] 39/4 62/13	received [2] 46/5 51/10
POL00047502 [2] 56/8 75/10	pressing [1] 60/15	prosecuting [5] 4/9 4/25 15/8 29/1 32/20	quashed [2] 48/8 50/15	recollect [1] 56/16
POL00047504 [1] 74/18	pressure [1] 21/5	prosecution [25] 2/13 5/1 18/16 21/6 25/18 26/2 27/2 29/8 29/20 29/24 30/2 30/13 37/21 43/13 43/23 48/3 49/7 49/25 50/9 50/23 51/4 52/1 56/1 77/13 78/22	queries [2] 35/20 79/21	recollection [2] 33/1 40/13
POL00047506 [1] 57/3	pressures [1] 49/17	prosecutions [18] 2/20 4/2 4/5 4/14 4/16 5/13 32/24 32/25 36/10 37/4 40/6 40/17 40/20 40/23 41/12 43/1 44/4 46/7	question [12] 24/22 24/24 35/24 36/20 39/18 40/11 52/5 54/4 54/6 68/18 73/6 80/14	record [14] 3/3 13/22 23/17 35/3 35/16 35/21 52/17 53/7 53/12 54/1 54/16 55/1 55/20 62/19
POL00047507 [2] 57/4 57/20	presumably [3] 18/22 44/3 78/1	prosecutor [2] 4/18 18/8	questioned [3] 1/9 67/11 85/4	recommending [3] 29/23 30/2 41/18
POL00047521 [2] 54/14 59/8	presume [1] 65/2	prosecutors [18] 4/13 4/17 4/19 25/25 26/6 26/8 26/9 27/4 29/25 31/9 31/20 31/22 32/11 32/14 33/16 33/21 34/3 34/6	questions [10] 1/11 3/6 12/6 24/19 35/25 64/4 66/11 83/3 83/3 83/18	record [14] 3/3 13/22 23/17 35/3 35/16 35/21 52/17 53/7 53/12 54/1 54/16 55/1 55/20 62/19
POL00113278 [1] 48/9	pretty [6] 66/2 68/8 70/14 73/2 75/16 79/9	prospect [13] 26/15 26/20 27/5 27/12 27/17 27/22 28/6 28/8 28/11 28/13 30/6 31/11 31/14	quieter [1] 16/18	records [4] 23/22 23/23 35/12 36/24
police [3] 24/14 24/17 37/15	prevented [1] 80/24	prospects [1] 30/4	quite [5] 2/21 12/25 16/19 32/15 73/9	rectify [1] 57/14
policy [7] 30/13 30/16 30/22 31/6 32/8 32/10 33/2	previously [2] 34/25 69/5	prove [5] 7/20 37/10 37/21 79/11 79/17	reading [6] 2/11 20/2 31/8 32/17 43/25 81/23	rectifying [2] 63/4 65/13
popular [1] 14/15	principal [1] 6/10	provenance [2] 36/8 36/11	rea [1] 26/19	reduce [1] 13/3
portion [1] 48/14	printed [1] 75/22	provide [1] 22/9	reached [1] 74/7	reduction [3] 12/7 12/14 13/5
position [1] 29/11	printout [2] 60/7 60/17	provided [8] 19/16 52/11 52/22 53/21 54/10 54/21 73/5 74/10	read [10] 19/17 20/1 29/24 30/23 31/7 31/21 48/13 73/11 77/1 81/15	redundancies [5] 12/19 12/20 13/13 13/14 13/16
possible [2] 62/7 69/6	prior [3] 21/7 22/24 37/8	providing [1] 27/25	reading [6] 2/11 20/2 31/8 32/17 43/25 81/23	redundancy [1] 12/23
possibly [3] 16/6 28/9 33/12	private [6] 4/2 4/5 4/14 4/16 16/18 18/12	provision [1] 8/7	real [2] 5/22 73/3	refer [5] 12/6 12/10 51/12 52/7 81/9
post [51] 2/16 4/20 5/15 5/20 9/2 9/7 11/20 17/13 17/19 17/22 19/12 22/10 23/5 23/10 23/10 24/1 24/12 26/5 30/12 30/18 38/5 38/17 41/5 41/9 41/13 41/20 43/15 44/8 45/23 48/17 49/3 49/20 50/8 52/22 53/21 54/21 58/5 67/16 67/18 70/14 77/15 77/23 78/11 79/17 79/21 80/24 81/10 81/14 81/14 81/21 82/1	privilege [1] 35/23	public [9] 28/3 28/19 29/1 29/9 29/12 29/21 30/7 32/18 50/12	realised [1] 2/12	reference [3] 60/25 70/9 77/13
post-committal [1] 70/14	probably [7] 23/9 24/6 37/6 43/17 54/4 65/7 74/10	purely [3] 17/11 20/13 22/17	realistic [9] 26/14 26/20 27/5 27/12 27/16 28/6 28/8 31/11 31/13	references [4] 51/21 61/7 61/8 77/3
post-Horizon [1] 41/5	problem [1] 24/13	purpose [1] 3/3	really [32] 9/3 9/13 9/16 11/24 11/25 14/22 16/11 23/11 23/12 24/22 28/15 38/16 40/13 50/25 51/2 51/5 54/3 54/12 56/4 56/7 56/20 58/14 58/24 61/11 61/23 62/14 65/20 65/23 66/10 66/11 79/12 80/9	referred [2] 54/17 71/16
postcodes [1] 75/2	problematic [1] 46/5	purposely [1] 7/19	reason [12] 15/4 33/21 39/16 41/14	referring [3] 6/3 68/23 74/1
postman [1] 28/22	problems [8] 17/15 49/17 71/12 71/13 80/23 81/10 81/12 81/16	purposes [1] 33/15		reflect [1] 7/14
potential [1] 67/25	procedure [4] 57/13 63/4 64/3 65/13	pursue [2] 21/6 49/3		reflection [3] 16/24 30/20 30/21
practice [7] 5/8 18/12 32/10 33/15 33/19 40/22 58/5	proceedings [4] 48/2 49/1 50/4 83/20	pushback [2] 21/11 21/14		reflections [2] 19/24 50/18
practices [1] 15/17	process [2] 50/2 57/14	put [9] 19/9 35/22 52/14 56/17 56/19 58/16 63/19 63/20		reflects [1] 65/8
practising [1] 3/19	processes [1] 22/16			refusal [1] 21/22
	processing [1] 34/20			Regional [1] 26/23
	produce [1] 52/4			regularity [1] 25/4
	produced [12] 37/10 37/19 41/7 54/1 54/7 57/21 61/12 75/7 75/8 75/12 75/25 80/7			regularly [3] 11/17 11/21 14/5
	produces [1] 40/8			
	producing [3] 58/4 75/4 75/21			
	production [1] 56/6			
	professional [2] 3/12 45/1			
	proffer [2] 29/3 44/9			
	promoted [2] 6/23 9/18			
	promotion [2] 7/16 7/17			
	proof [1] 50/7			
	properly [14] 10/6 20/17 20/20 20/21			

R	responsibility [1] 5/2	70/3 70/7	section [4] 37/15	shorter [4] 54/17
relating [2] 4/2 21/3	responsible [4]	Sam [1] 1/11	37/18 38/6 82/15	55/19 62/1 62/4
relation [5] 21/8 45/3	35/17 44/25 45/5	same [11] 13/8 13/9	Section 69 [3] 37/15	shortest [1] 62/6
45/7 49/4 83/12	69/20	13/12 15/15 15/18	37/18 38/6	shortfall [2] 48/20
relevant [8] 17/25	rest [1] 79/12	15/18 15/20 57/2 57/4	Security [7] 13/11	49/21
20/18 27/19 28/14	restricted [2] 11/13	59/7 79/5	33/4 52/2 69/9 69/12	shortly [2] 23/6 54/2
58/18 69/25 78/2 79/7	11/15	satisfy [2] 40/7 76/18	69/25 71/18	should [15] 1/15 1/20
reliability [5] 20/10	result [1] 49/1	Saturdays [1] 46/15	see [34] 1/3 1/20	2/5 15/18 18/7 20/5
47/16 67/19 70/2	Retail [1] 2/17	saved [1] 52/23	2/24 10/5 24/25 29/25	20/8 25/19 30/25
77/19	retired [1] 12/24	saw [2] 41/23 65/21	34/4 41/25 42/22 47/8	38/19 41/18 44/8 62/8
reliable [2] 39/15	return [1] 83/7	say [69] 3/21 4/1 4/5	52/17 54/25 56/20	78/22 80/2
40/8	returned [1] 11/11	4/25 5/10 7/23 8/12	57/10 57/11 57/12	show [2] 60/6 60/16
reliably [1] 67/23	reus [1] 26/19	8/21 9/19 10/7 11/15	57/24 58/2 59/18 60/3	showed [1] 49/12
reliance [1] 66/13	reversal [3] 57/14	12/11 13/2 13/23 14/4	60/9 61/2 62/11 64/14	showing [1] 63/22
relied [4] 22/20 38/20	64/8 64/25	14/17 15/4 15/7 15/8	70/22 70/23 71/1 71/2	shown [1] 57/6
40/25 58/6	reversals [2] 64/7	15/9 15/11 19/21 25/5	71/4 72/4 77/2 81/24	shrank [1] 13/12
rely [1] 40/6	64/23	25/17 25/19 27/15	83/4 83/23	shrinking [1] 13/19
relying [1] 37/10	review [3] 51/11	27/25 28/14 30/4	seem [2] 13/17 53/24	sick [1] 45/25
remainder [1] 2/25	53/15 66/18	33/15 34/9 34/14	seems [1] 74/21	side [2] 57/19 60/21
remember [36] 7/12	reviewed [2] 33/6	34/15 34/17 35/7	seen [6] 12/3 61/14	sides [1] 58/13
7/17 8/3 8/8 9/4 9/15	52/7	38/25 39/14 39/17	61/15 65/20 72/16	signature [1] 2/5
11/12 11/18 11/24	reviewing [4] 25/20	44/21 50/8 51/23 52/9	74/10	significant [3] 39/8
11/25 12/17 12/21	25/22 53/13 76/6	52/19 53/17 53/24	sees [1] 46/16	40/16 42/20
12/25 13/3 21/14	right [17] 26/13 31/2	54/25 55/3 55/25	self [1] 35/23	similar [6] 5/14 15/14
23/11 23/13 24/3 24/5	31/4 34/2 41/13 50/21	56/23 63/18 64/2	self-incrimination [1]	15/18 23/5 32/1 68/21
26/7 37/6 37/12 38/13	57/10 59/24 62/21	65/23 66/17 66/23	35/23	similarities [1] 15/22
38/14 39/5 39/23	63/6 66/7 73/19 77/9	67/7 67/16 68/14	senior [13] 6/23 6/23	simply [3] 7/14 12/14
40/10 44/25 46/3	78/8 82/9 83/8 83/23	68/21 68/22 70/20	7/3 7/7 7/8 7/13 7/18	32/10
46/10 46/11 46/19	rights [1] 41/10	71/13 72/10 72/17	8/10 9/18 11/1 14/25	since [1] 19/25
54/9 58/24 73/8 82/25	Road [1] 74/20	76/5 77/7 80/21 81/13	17/5 42/11	single [4] 30/15 31/5
remind [1] 37/17	Rob [5] 8/15 8/17	82/5 82/14	sense [1] 20/24	32/7 32/9
remove [1] 59/13	16/14 16/15 16/17	saying [13] 40/5	sensitive [2] 76/10	sir [10] 1/3 46/20
removed [1] 49/9	Roger [4] 6/4 6/8	41/19 58/3 60/22	76/11	46/25 47/3 47/8 73/16
reorganised [1] 46/3	8/13 8/17	60/25 61/8 62/8 63/10	sent [5] 21/9 24/2	83/2 83/7 83/21 83/25
repeal [1] 38/6	role [5] 4/25 6/19	65/10 65/16 68/9 69/6	53/16 69/16 76/13	sit [1] 82/19
repealed [1] 37/15	10/8 18/11 76/5	83/13	sentence [1] 25/20	six [1] 48/22
repeat [1] 6/14	rolled [1] 39/2	says [17] 25/21	sentenced [1] 48/22	size [1] 13/10
repeatedly [1] 68/10	rollout [2] 39/10 49/5	30/14 33/6 48/14 53/7	separate [1] 12/23	slight [2] 12/7 18/10
rephrase [2] 17/16	room [1] 62/20	56/14 57/20 60/3 61/4	September [2] 48/15	small [5] 4/1 4/6
33/22	roughly [3] 7/3 12/12	62/23 63/17 64/4 64/6	48/21	28/17 41/16 41/23
reply [2] 63/25 65/1	42/7	64/10 64/17 64/24	serious [1] 6/18	smaller [2] 1/18 31/1
report [2] 8/17 76/12	round [3] 12/19	68/25	servant [1] 75/16	so [131]
reported [6] 8/13	13/13 13/15	SB [3] 56/11 57/23	servants [1] 74/25	social [5] 14/6 69/8
8/19 8/24 8/25 60/22	rounds [2] 12/18	60/3	served [1] 27/20	69/12 69/25 71/18
70/11	12/23	SB/12 [2] 56/11	service [2] 8/7 41/24	solely [1] 18/16
reporting [1] 9/1	Royal [5] 4/18 5/20	57/23	Services [4] 41/20	solicitor [13] 3/13
representative [1]	8/5 8/6 32/22	schedule [3] 76/9	62/7 82/5 82/9	3/16 9/2 9/7 18/18
69/8	run [9] 7/18 8/9 10/25	76/10 77/10	set [6] 25/16 29/18	18/22 19/5 19/7 19/11
representing [1]	41/2 55/13 55/16	schedules [5] 41/1	37/18 51/9 67/3 72/21	22/2 22/5 22/5 22/8
48/19	55/17 57/12 66/7	75/5 75/6 75/21 76/21	share [1] 15/24	solicitor's [1] 18/12
request [4] 51/25	run-up [6] 7/18 8/9	screen [3] 57/17	shared [4] 81/18 82/3	solicitors [4] 3/19
58/22 67/8 68/19	55/13 55/16 55/17	59/18 75/10	82/7 82/13	10/9 10/12 72/21
requested [6] 44/13	66/7	screens [3] 57/19	sharing [1] 80/25	some [16] 3/6 5/19
67/23 68/6 68/19	running [2] 2/1 9/9	59/25 60/21	she [24] 10/16 48/18	5/20 5/21 7/10 13/1
69/10 80/2	runs [2] 52/18 53/19	script [1] 61/10	48/20 48/21 49/1 49/8	19/10 22/16 28/23
requesting [1] 69/24	S	sealed [1] 60/18	49/9 49/15 49/17	51/6 53/2 53/2 62/13
required [1] 50/13	sad [1] 20/6	search [2] 21/10 79/2	49/18 49/23 51/1 51/2	63/12 74/22 81/21
reserved [1] 16/18	sadly [1] 46/18	24/16 24/18	57/15 62/25 62/25	someone [6] 8/5
resources [1] 17/18	said [17] 5/25 6/13	seared [1] 24/14	63/2 63/2 63/3 65/11	26/24 54/8 65/3 75/13
respect [4] 20/23	11/2 21/16 42/17	second [6] 28/4 57/8	65/12 67/12 68/5 69/2	75/13
42/13 78/23 79/22	44/13 45/24 47/11	59/14 70/19 72/9 73/7	she'd [1] 57/16	something [13]
respects [2] 20/21	47/14 49/16 49/18	secondly [2] 18/18	she's [2] 75/16 75/16	11/24 24/18 28/17
70/5	63/11 64/22 65/9 66/3	22/5	shocked [1] 32/5	34/10 45/11 55/23
			short [1] 47/6	68/21 70/12 72/7

S	57/25 66/14 68/8 68/13 68/19 69/3 69/7 69/24 70/4 70/8 70/20 70/25 72/12 73/14 76/24 78/5 78/24 79/1 79/10 79/16 79/16 80/3 80/12 80/21 83/11	28/20 29/13 40/25 43/2 80/2 80/4 sufficient [6] 26/14 27/11 28/5 28/7 31/13 46/24	32/22 56/5 63/11 talking [5] 4/6 12/14 17/11 23/2 26/22 tape [14] 23/17 52/4 52/17 52/25 53/7 53/12 53/22 54/16 54/22 55/1 55/20 58/10 61/12 63/13	83/17 83/25 that [366] that I [6] 7/20 58/25 61/14 65/17 68/8 68/19 that's [45] 3/12 3/17 8/10 11/24 15/25 17/9 19/21 21/13 21/15 29/15 30/5 30/5 30/21 31/4 32/1 33/3 35/9 35/10 44/18 45/11 46/20 52/16 53/5 53/24 54/14 56/11 57/3 57/10 57/22 57/23 58/17 58/18 62/4 62/17 66/16 69/17 70/11 73/2 73/8 78/4 78/8 78/15 79/16 82/25 83/21
something... [4] 78/15 82/19 82/21 82/25	statements [13] 2/11 20/18 20/25 23/14 23/15 41/21 76/4 76/17 77/4 80/16 80/18 80/18 82/16	suggested [1] 29/8 summaries [7] 51/20 51/24 56/6 58/20 59/5 59/6 81/24	tapes [1] 60/1 target [2] 33/9 33/10 tasks [1] 10/19 TB [1] 57/21 TB/12 [1] 57/21	theft [10] 5/14 11/22 15/9 22/18 29/17 36/10 40/24 48/19 49/11 49/18
sometimes [4] 19/7 55/25 56/2 58/12	states [3] 52/24 53/22 54/21	summary [34] 27/20 51/18 52/4 53/7 53/11 53/12 53/22 54/1 54/11 54/15 54/20 55/1 55/11 55/13 55/17 55/20 55/24 56/17 56/24 58/4 58/8 58/10 58/23 59/2 62/1 62/2 62/3 62/4 62/7 65/8 65/17 65/19 66/5 66/6	team [64] 5/7 5/12 5/16 5/18 6/1 6/7 6/16 7/4 7/5 7/10 7/11 9/9 9/13 10/1 11/1 11/1 13/2 13/7 13/11 13/18 13/18 14/1 14/5 14/15 15/3 15/5 15/7 16/22 16/25 17/7 17/12 18/5 20/12 22/8 26/1 32/2 32/12 33/5 33/23 37/2 40/4 40/12 41/18 42/4 42/14 43/6 44/22 44/25 45/10 45/18 52/3 54/8 55/22 61/13 62/14 81/3 81/6 81/19 82/3 82/8 82/10 82/18 82/22 83/1	their [11] 10/13 14/1 14/20 24/18 24/20 24/20 35/15 35/16 54/8 54/12 69/12
Sonia [3] 69/1 70/9 74/2	Staying [1] 22/1	summed [1] 30/16	Teams [1] 82/6	them [12] 10/24 23/20 32/6 43/11 59/17 59/18 64/1 69/16 75/5 77/21 80/8 82/15
sophisticated [1] 39/4	step [2] 26/21 51/11	supervise [1] 10/8	technology [3] 39/4 39/17 39/19	then [37] 2/3 3/15 7/7 8/15 18/4 18/5 19/9 27/14 28/7 28/14 28/18 31/14 34/8 46/6 47/25 51/18 51/19 54/1 55/12 55/21 62/16 66/5 66/13 67/16 72/9 75/15 76/19 76/20 77/6 77/11 78/19 81/20 82/4 82/9 82/18 83/23 83/24
sorry [24] 6/13 7/12 9/3 20/25 25/14 25/19 31/1 33/22 34/24 38/13 38/16 41/6 50/14 51/5 55/16 59/12 60/20 61/3 61/20 63/6 66/10 66/15 74/6 77/17	Stephen [3] 56/12 57/9 67/4	supervised [1] 9/24	tell [6] 19/9 54/24 61/15 66/8 69/13 73/22	there [114] there'd [4] 23/25 24/13 26/16 26/17 there's [21] 2/3 2/9 15/8 28/5 32/21 35/20 35/22 47/12 51/20 55/12 57/11 60/5 60/9 60/13 62/8 63/25 66/4 73/6 74/15 75/18 77/2
sort [5] 8/6 21/19 32/9 45/7 82/22	steps [2] 25/17 68/16	supervising [1] 10/23	telling [1] 63/23	therein [1] 37/21
sought [1] 71/20	Steve [13] 51/13 51/15 51/16 51/18 54/5 54/7 56/7 56/22 61/12 66/12 68/24 70/11 73/25	supervision [3] 9/20 10/22 13/24	Temple [1] 74/20	these [14] 20/8 48/2 51/13 52/6 56/6 58/20 61/21 66/10 66/22 67/1 72/23 74/24 74/24 80/6
soul [1] 5/2	STEVENS [5] 1/9 1/11 47/2 83/20 85/4	supervisory [1] 10/7	ten [6] 4/7 4/7 4/8 5/11 12/10 25/17	they [28] 7/24 8/19 8/20 8/22 9/25 10/13 10/24 11/3 12/22 13/13 15/23 19/8 19/9 21/23 24/15 24/16
sound [2] 14/10 34/2	still [5] 11/10 18/23 31/9 51/5 72/8	support [7] 17/13 41/11 66/25 77/17 77/18 78/12 79/19	tend [3] 29/20 30/1 77/17	
sounds [2] 29/2 53/4	still a [1] 11/10	sure [13] 24/6 32/15 58/25 66/2 68/8 70/3 70/14 73/2 75/16 76/22 76/25 77/9 79/9	tended [3] 5/24 14/1 78/12	
source [2] 15/14 46/8	stolen [5] 23/5 24/10 28/18 28/23 28/24	surprised [1] 43/7	TERESA [4] 1/8 1/14 3/8 85/2	
sources [1] 17/13	stood [1] 21/25	surprising [2] 15/21 15/25	terms [9] 4/5 7/13 8/12 23/22 37/14 53/11 58/5 58/15 79/17	
speak [2] 14/18 33/18	stored [2] 36/3 36/24	suspect [1] 33/7	test [4] 25/25 26/12 28/3 30/8	
speaking [2] 14/20 20/13	strata [1] 81/2	suspended [1] 48/23	text [1] 60/10	
specific [2] 10/19 38/9	strength [2] 17/7 25/23	system [30] 15/15 20/11 20/16 20/19 34/19 39/1 39/10 39/20 39/22 39/25 40/7 41/2 49/13 51/3 67/13 67/22 68/9 69/21 72/19 75/23 77/19 78/3 78/6 78/13 78/24 79/8 79/11 79/20 80/5 81/17	than [12] 4/7 4/7 4/8 26/16 28/11 32/24 33/24 36/16 36/23 45/9 49/9 58/23	
specifically [2] 70/7 72/22	strongly [1] 41/18	systematic [1] 73/9	thank [25] 1/5 1/6 1/23 25/16 31/4 34/7 46/25 47/3 47/10 47/11 56/10 58/1 60/1 62/19 63/7 63/16 66/16 74/14 74/18 76/1 76/1 83/2 83/9	
specifics [1] 37/7	structural [3] 80/23 81/9 81/12			
SPM [1] 36/24	struggling [1] 30/23			
spoke [1] 26/24	study [5] 46/22 47/12 47/25 48/4 48/5			
spoken [1] 69/1	style [2] 16/7 16/10			
staff [1] 12/8	sub [2] 23/10 24/1			
stage [10] 7/10 9/19 26/12 27/9 27/24 30/8 31/15 43/18 65/21 83/16	subject [2] 2/24 22/1			
standing [1] 40/5	submissions [1] 38/5			
stands [1] 3/4	submitted [1] 70/18			
start [6] 12/10 16/8 51/6 52/13 63/7 81/13	subpostmaster [10] 11/22 23/4 24/11 29/16 35/1 35/5 35/13 35/24 36/17 67/20			
started [4] 5/15 11/3 28/25 69/17	subpostmasters [9] 5/13 15/9 22/18 25/5 34/19 36/10 37/4 38/20 40/24			
starting [3] 3/15 23/8 26/13	substantial [2] 37/1 48/14			
starts [3] 63/8 68/12 68/13	substantive [2] 7/15 7/17			
state [1] 1/12	success [7] 26/17 27/18 28/10 28/11 28/13 30/4 30/7			
stated [1] 37/21	such [8] 22/19 24/22			
statement [54] 1/21 1/23 2/1 2/3 2/7 2/22 2/25 3/3 3/4 3/21 5/10 12/7 13/21 14/5 17/24 20/22 25/13 30/15 31/5 32/7 34/9 34/17 37/24 38/24 39/14 51/8 56/12 56/23 57/9				

T	10/25 29/24 31/21 41/16 42/3 43/25 47/19 60/7 60/18 63/14 76/20 77/1	true [2] 2/7 2/25 trump [2] 31/23 34/5 trusted [2] 19/12 19/14 try [2] 15/24 83/15 trying [10] 8/6 12/17 19/8 23/11 24/3 24/9 30/3 32/17 44/18 62/6	unsigned [1] 57/9 until [5] 19/17 22/21 44/6 80/1 84/2 untoward [1] 23/21 unused [7] 19/15 21/9 21/20 76/10 76/11 76/12 77/4 up [30] 7/18 8/9 17/16 17/22 30/10 30/16 30/22 36/24 38/23 43/12 43/18 51/8 52/15 53/5 54/14 55/13 55/16 55/17 57/2 59/7 62/12 62/16 62/17 65/15 66/7 67/20 71/6 75/10 81/20 82/1 upon [1] 36/9 us [5] 7/9 7/11 57/5 78/19 82/13 use [4] 3/13 17/20 37/24 44/3 used [7] 22/3 22/24 24/2 26/1 26/10 33/23 82/22 usual [1] 82/10 usually [5] 23/9 55/19 62/5 62/5 76/9	W waiting [1] 57/8 want [13] 13/20 18/10 22/2 44/20 47/13 47/25 48/5 51/6 52/13 58/13 59/5 59/16 63/11 wanted [8] 10/3 15/1 19/9 43/15 44/15 46/13 58/16 82/14 warehouse [1] 21/10 was [268] wasn't [23] 15/3 20/4 20/20 20/21 25/6 29/8 38/4 40/1 43/8 43/13 45/23 46/12 58/11 65/15 69/25 71/7 73/24 74/3 74/10 76/23 79/13 79/14 82/18 way [14] 9/1 16/4 23/12 31/24 32/4 40/16 40/22 43/16 45/8 62/3 62/4 63/24 70/12 73/11 ways [5] 8/19 15/17 19/10 22/3 67/24 we [95] we'd [1] 28/5 we'll [7] 4/20 23/6 24/25 51/21 52/8 62/16 83/15 we're [5] 17/11 57/1 57/7 61/3 83/21 We've [2] 22/13 40/15 Wednesday [1] 1/1 weekly [6] 19/18 20/1 34/21 43/25 81/25 82/23 well [21] 5/3 8/25 10/14 12/4 16/8 17/4 19/20 20/16 24/12 35/5 40/5 47/1 56/16 61/7 64/2 68/12 72/10 74/11 77/7 80/4 83/9 went [11] 8/23 10/1 12/22 12/22 12/24 13/15 14/5 18/15 24/4 24/7 46/15 were [79] 4/9 4/12 4/14 5/11 6/3 7/3 7/25 9/18 10/6 11/6 11/6 11/16 12/18 13/7 13/18 14/19 14/24 15/22 16/4 17/10 17/12 17/18 17/19 18/12 19/8 20/9 20/18 23/2 24/14 24/17 25/17 27/25 28/4 28/24 29/4 29/18 29/25 31/14 32/12 33/16 35/25 36/11
they... [12] 28/24 32/5 35/16 49/16 61/2 69/14 69/20 74/25 75/4 78/16 78/18 82/13 they'd [2] 28/23 28/25 they're [2] 35/17 75/11 they've [2] 72/25 75/22 thing [3] 2/9 18/15 19/9 things [16] 10/5 10/18 16/17 17/10 20/4 20/8 24/20 37/22 44/17 45/3 45/19 58/12 72/23 75/24 80/10 82/2 think [91] thinking [5] 12/16 26/10 36/19 43/14 73/19 this [67] 1/19 2/18 14/9 15/9 19/21 26/22 27/19 27/23 30/3 31/15 31/16 31/17 31/21 31/23 32/14 33/1 33/23 40/7 43/16 44/3 47/13 47/14 48/3 48/5 48/14 49/20 50/2 50/22 51/14 52/7 52/17 52/18 52/24 53/6 53/8 53/9 53/19 54/1 54/7 54/15 54/24 55/25 56/9 57/7 57/8 57/14 60/2 60/6 60/16 61/6 63/18 65/24 69/3 69/23 70/9 71/16 72/11 73/10 73/25 74/11 74/16 76/4 78/15 79/15 81/6 83/16 83/18 those [26] 4/9 4/14 4/16 5/12 12/5 15/22 19/4 22/6 22/24 25/11 36/11 39/12 42/14 45/5 45/19 57/5 61/6 61/8 61/25 75/6 75/11 76/6 76/13 80/9 80/16 81/11 though [2] 24/24 44/16 thought [10] 19/6 19/17 19/22 34/14 71/22 72/8 78/1 78/15 78/25 79/15 thoughts [1] 50/19 three [2] 10/9 54/25 threshold [1] 26/2 threw [1] 17/16 through [13] 10/1	41/16 42/3 43/25 47/19 60/7 60/18 63/14 76/20 77/1 throughout [1] 9/1 ticked [2] 72/5 72/6 time [38] 2/18 3/10 5/10 7/8 7/8 7/15 9/5 10/7 10/24 12/11 13/5 13/12 19/17 19/22 34/15 37/17 39/1 42/8 43/22 45/12 46/20 47/23 47/24 48/4 49/5 50/4 51/3 52/11 54/13 55/9 57/2 57/4 59/7 60/1 60/22 76/13 77/15 80/3 timeline [3] 55/10 55/11 56/5 times [3] 10/11 37/25 58/24 title [6] 6/8 6/14 6/21 7/13 53/22 54/22 titled [1] 30/12 today [2] 1/24 61/15 today's [1] 83/19 together [5] 14/6 35/22 57/12 59/17 80/19 told [2] 20/8 21/23 Tony [1] 12/23 too [3] 60/16 82/17 83/17 took [4] 10/7 16/13 16/17 80/11 top [4] 34/16 52/17 53/6 81/13 total [1] 10/9 totted [1] 36/24 towards [1] 11/13 trainee [1] 10/9 training [10] 44/20 44/21 45/1 45/14 45/16 45/24 46/6 46/10 46/14 46/16 transaction [1] 35/12 transactions [5] 35/3 35/17 35/21 35/25 36/3 transcript [16] 52/9 52/14 52/15 52/20 52/21 53/25 54/23 55/15 56/18 58/7 58/11 58/13 58/16 58/23 59/3 66/4 transcript.1 [1] 52/25 Transcript.1.doc [1] 53/23 transcripts [2] 47/21 81/24 transparent [1] 80/25 trial [5] 50/6 55/14 55/16 55/18 66/7 tried [1] 70/19	turn [19] 1/19 12/4 25/13 26/21 47/25 48/5 48/9 48/10 50/17 51/21 52/8 59/9 59/12 59/21 59/23 61/3 62/22 67/6 80/20 twice [1] 60/15 two [14] 2/4 4/8 4/23 10/9 12/14 12/18 12/22 22/3 45/3 48/23 51/20 57/2 59/7 61/2 two years [2] 4/23 48/23 type [14] 5/6 7/24 11/7 11/8 11/16 23/1 23/7 40/25 43/9 43/14 43/22 44/17 53/9 69/3 typed [2] 56/14 57/20 types [4] 11/4 23/3 44/8 44/12 typically [3] 25/18 52/3 81/4	unclear [1] 75/15 uncomfortable [1] 29/23 uncommon [2] 51/24 56/3 under [2] 21/5 30/14 undercut [1] 8/6 undermine [3] 77/18 78/12 79/19 undermines [1] 77/12 understand [6] 20/9 39/20 43/9 47/15 52/19 69/13 understanding [5] 26/11 34/22 43/2 78/25 79/18 undoubtedly [1] 81/6 unexplained [1] 49/21 unfair [1] 50/9 Unfortunately [1] 57/1 Unit [3] 23/15 24/3 74/19 universal [1] 8/7 unless [7] 24/14 24/15 27/12 29/12 82/7 82/13 83/3 unlikely [1] 52/10 unreliable [2] 51/3 80/5	V Valerie [1] 75/15 variation [1] 30/6 variety [2] 11/3 11/10 various [5] 34/20 65/18 80/6 81/15 81/24 verdicts [1] 48/25 version [12] 30/24 42/22 52/6 53/15 53/17 58/4 60/24 61/18 65/16 65/18 65/24 65/25 versions [9] 54/10 55/1 56/2 56/4 61/2 61/11 65/20 65/21 65/22 very [21] 4/1 4/6 5/7 9/12 14/2 14/23 15/14 18/8 19/6 28/21 28/24 41/16 41/23 42/1 43/11 57/18 76/3 80/25 82/13 83/1 83/9 VL [1] 75/15 voluntarily [3] 23/18 24/15 24/16 voluntary [2] 13/14 13/16 voucher [6] 49/10 49/14 49/24 57/17 63/1 63/15 vouchers [3] 49/9 69/15 69/16

<p>W</p> <p>were... [37] 37/22 38/4 39/11 39/25 40/17 40/23 41/1 41/9 42/11 42/13 43/22 43/23 44/4 45/5 45/20 45/21 47/11 47/15 49/16 55/7 56/24 58/25 61/21 62/24 67/17 69/20 75/19 75/21 76/9 76/14 78/11 80/22 81/8 81/12 81/16 82/1 82/10</p> <p>weren't [3] 21/23 44/10 44/23</p> <p>what [72] 5/5 5/25 6/8 7/24 9/7 9/23 11/8 11/16 12/2 15/20 17/12 17/15 18/9 19/3 19/21 19/24 19/25 20/14 20/19 20/21 20/24 21/16 22/23 23/1 24/4 24/8 25/3 25/4 26/4 26/11 28/2 29/2 29/17 30/3 30/6 30/21 33/1 33/3 35/9 38/7 39/21 42/2 43/9 44/8 44/14 44/17 49/18 51/10 53/17 54/12 57/22 58/6 58/17 58/18 61/15 64/5 64/11 65/9 65/24 69/17 71/25 73/4 73/5 74/9 76/8 76/15 79/20 79/21 80/10 80/14 81/11 81/15</p> <p>whatever [1] 46/18</p> <p>when [63] 2/11 2/21 4/5 4/9 4/12 4/15 5/15 5/25 6/3 6/11 6/21 7/5 7/7 7/23 9/2 9/15 9/18 9/25 11/12 11/15 12/16 13/4 14/17 15/4 15/21 16/17 17/8 19/7 22/16 22/19 26/5 26/10 32/3 32/12 37/4 38/7 41/15 42/7 42/9 42/25 42/25 47/18 48/8 48/18 49/8 49/24 53/16 53/18 55/5 55/20 58/20 58/20 61/14 63/4 63/18 64/15 65/9 65/13 65/17 68/6 70/15 72/1 73/17</p> <p>where [21] 8/4 18/20 21/8 21/14 21/19 21/20 22/9 24/9 26/22 29/22 32/18 34/23 37/12 38/20 39/5 39/24 41/5 68/2 72/17 80/10 82/23</p>	<p>whether [49] 6/17 10/4 10/4 12/21 12/22 13/1 13/6 13/7 13/10 13/12 18/7 23/19 24/10 26/1 26/15 27/5 28/5 28/10 28/19 29/25 33/13 40/19 45/16 50/1 54/9 54/11 56/17 56/22 58/9 61/20 62/11 62/12 67/9 67/21 68/9 70/3 70/6 70/7 70/23 71/17 72/5 73/16 77/2 78/6 78/7 78/10 78/21 79/10 79/16</p> <p>which [49] 11/18 12/17 17/18 23/6 24/25 25/25 29/19 30/18 30/18 35/4 36/9 36/11 37/9 40/17 40/23 44/4 45/8 46/7 51/21 52/6 53/17 54/17 55/2 55/3 55/6 56/17 58/3 59/20 59/24 61/14 61/15 62/18 65/16 65/18 65/20 65/21 65/21 65/21 66/3 66/8 67/6 70/5 71/6 74/3 79/6 79/18 79/19 80/1 81/4</p> <p>whichever [1] 53/15</p> <p>whiff [2] 67/22 67/24</p> <p>while [1] 57/5</p> <p>whilst [2] 33/20 57/7</p> <p>who [32] 2/12 3/23 6/5 8/21 9/12 16/13 18/3 18/9 22/14 23/4 28/16 28/21 28/23 31/19 32/15 33/8 42/2 42/15 44/25 46/14 46/16 48/17 51/15 54/4 54/7 62/12 66/12 73/4 75/14 75/19 75/21 82/2</p> <p>who'd [1] 44/7</p> <p>whole [3] 42/1 58/16 82/5</p> <p>whom [2] 8/24 81/21</p> <p>why [22] 7/24 16/1 16/2 17/3 20/7 27/2 27/8 33/3 34/4 40/11 44/7 44/10 46/11 55/6 55/7 55/14 61/6 61/8 62/24 65/15 78/4 79/5</p> <p>wide [1] 11/10</p> <p>wider [2] 45/9 81/6</p> <p>wilful [1] 32/22</p> <p>will [2] 48/5 83/14</p> <p>Williams [3] 6/4 8/13 8/17</p> <p>Williams' [1] 6/8</p> <p>Williamson [8] 1/7 1/8 1/10 1/14 3/8 73/11 83/10 85/2</p>	<p>Wilson [7] 8/15 8/17 16/14 16/15 16/17 31/18 33/5</p> <p>wish [1] 2/9</p> <p>withdraw [2] 21/13 21/24</p> <p>withdrawn [2] 21/16 21/18</p> <p>within [22] 2/20 5/7 7/4 14/11 14/20 16/22 17/11 17/12 19/12 31/3 33/11 37/2 39/3 40/12 41/19 42/2 43/5 62/13 81/19 81/20 82/4 82/12</p> <p>without [3] 10/21 41/21 42/20</p> <p>WITN08680100 [1] 3/4</p> <p>witness [16] 1/21 3/25 25/13 31/7 35/2 36/18 51/8 66/14 67/7 68/19 69/7 69/24 74/17 74/19 75/15 80/19</p> <p>witnesses [5] 74/24 75/9 75/19 75/25 80/19</p> <p>woman [1] 9/5</p> <p>work [10] 5/4 6/20 9/20 11/3 13/6 14/1 43/1 49/17 53/13 81/5</p> <p>worked [12] 3/18 10/16 17/4 31/24 32/2 32/4 37/8 37/9 55/19 62/5 73/2 73/8</p> <p>working [16] 5/13 5/15 13/20 14/17 15/17 20/20 20/20 20/21 28/21 39/25 40/3 67/22 68/3 70/6 80/23 81/10</p> <p>would [126]</p> <p>wouldn't [7] 18/2 21/24 22/20 27/14 29/11 31/11 79/3</p> <p>written [4] 1/23 26/23 31/17 31/17</p> <p>wrong [8] 25/14 60/15 63/20 64/12 64/14 64/16 64/16 69/14</p> <hr/> <p>Y</p> <p>yeah [32] 4/8 6/2 6/10 7/2 12/13 14/12 14/14 16/16 18/14 18/17 18/19 18/21 19/23 22/7 22/22 23/25 29/5 29/7 35/12 35/13 42/12 42/19 43/7 45/15 59/20 61/2 64/11 64/14 64/17 65/2 65/5 71/9</p>	<p>year [1] 38/7</p> <p>years [3] 4/23 48/18 48/23</p> <p>years' [2] 60/4 60/12</p> <p>yes [79] 1/5 1/17 2/3 2/5 2/6 2/10 3/9 3/12 3/20 4/4 4/11 4/19 4/22 4/24 5/4 5/6 5/9 6/12 6/22 6/25 8/16 9/11 9/22 10/14 11/1 11/20 13/16 15/12 16/23 17/25 18/25 21/4 27/1 29/10 29/15 29/15 30/25 31/25 35/19 36/2 36/5 36/7 36/14 36/25 41/3 46/23 46/25 47/2 47/10 48/12 52/21 53/10 54/20 54/20 54/24 56/13 56/15 57/23 57/23 57/24 58/1 58/1 59/12 59/16 60/11 67/5 69/19 69/22 71/25 72/24 73/16 74/13 75/11 75/21 75/23 76/7 78/4 78/4 83/20</p> <p>you [357]</p> <p>you'd [5] 7/14 38/14 55/19 61/24 71/10</p> <p>you're [10] 3/7 26/22 29/2 45/25 53/9 63/21 64/11 68/23 75/18 79/24</p> <p>you've [9] 19/21 33/20 54/17 63/18 63/18 63/19 63/22 71/16 72/16</p> <p>young [3] 28/21 28/22 28/24</p> <p>your [86]</p> <p>yourself [3] 18/2 20/14 58/22</p>
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