

Friday, 1 December 2023

(10.00 am)

JARNAIL SINGH (continued)

Questioned by MR BEER (continued)

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

SIR WYN WILLIAMS: Yes, thank you.

MR BEER: Thank you very much.

Good morning, Mr Singh.

A. Good morning, good morning.

Q. Can we pick up where we left off yesterday, which was examining issues, in the general sense, on the process and the procedure for prosecuting suspected offenders. Did you ever advise the Post Office to pursue a prosecution to act as a deterrent to other subpostmasters from committing crimes?

A. How do you mean, sorry? Can you flesh it out a little bit, so I can -- I -- from my recollection -- I-- no, no.

Q. Putting it another way, was the aim of deterring other potential offenders a relevant consideration in deciding whether to prosecute a subpostmaster?

A. I don't think so, well -- well, no. When

1

please. Thank you. Just scroll down a little more, thank you.

Under "Conclusion", paragraph 28, you say:

"In my opinion, because of the above evidence and matters, there is sufficient evidence to provide a realistic prospect of conviction of Mrs Gourlay.

"In my opinion it is in the public interest to prosecute Mrs Gourlay because of breach of trust, and the large amount of loss. Then prosecution and conviction will act as a deterrent to others.

"Mrs Gourlay in her interview is implicitly attempting to blame other parties."

It's the part of the sentence there which says that "prosecution and conviction will act as a deterrent to others". That tends to suggest that, in deciding whether to prosecute or not, you did take into account the possible deterrent effect of a prosecution and perhaps conviction upon others; would you agree?

A. Firstly, it's such a long time ago, I don't know the full details. I would have read the files in depth, considered it. Maybe in general terms, but not -- the main ones are the fact is

3

I advised no, and --

Q. Why do you think no?

A. Because you're working on the merits and the evidence before you on that particular case. That's -- you're concentrating on what's before you. You're not sort of looking beyond anything, beyond that.

Q. Okay. Can we look, please, at POL00107869, please. If we just look at the email at the bottom of the page. If we scroll up, so you can see who it's from and to. It's from you to Mr Scott and it's essentially your advice on a charging decision, as I'm going to call it, for Christine Gourlay in Scotland. You say:

"I have read the file and having reviewed the papers, in my opinion there is both sufficient evidence to provide a realistic prospect of conviction of Mrs Gourlay and it is also in the public interest to prosecute her."

Do you see that?

A. Yes.

Q. Then over the following pages there's an analysis of the allegations, the evidence, possible defences, and the like. If we can turn to page 4, please, and look at the bottom,

2

there's evidence, the public interest is the breach of trust. There's a large amount of loss.

Q. I'm not asking about those; I'm asking you about the reasoning, which says, "prosecution and conviction will act as a deterrent to others"?

A. Well, that -- maybe just complete to the sentence or something, it wouldn't be -- I -- to be honest, I -- that -- I -- that's never actually gone through -- it's not the process I would follow. I don't know why, in these circumstances, where there was something in the, you know, in the Investigation Officer's report or in the interview or something that John Scott, I think, specifically asked me to consider but, in general terms, that was not the aim.

Q. He didn't --

A. Certainly -- I mean, I accept the fact it's here, yes. But it's not the main -- it's never been the main consideration in any of my advices or in my consideration. For some reason it's there because it's particular, peculiar, to these details. That's in this particular case. I don't know whether he's particularly asked or

4

1 the Investigation Officer asked or he asked me
 2 to address it, but yes, it's there.
 3 **Q.** In the documents that we've got, the
 4 investigation report and the other
 5 communications from Mr Scott --
 6 **A.** Yes.
 7 **Q.** -- he doesn't ask you "Please can you include in
 8 your advice whether or not prosecution and
 9 conviction will act as a deterrent to others and
 10 please include one way or the other in your
 11 reasoning whether you take into account or leave
 12 out of account the possible deterrent effect".
 13 It's something that comes from you and not him.
 14 **A.** Yes, maybe then I -- you know, it's such a long
 15 time ago. I don't know -- maybe on that
 16 particular day, but certainly generally
 17 I wouldn't of -- I mean, the other advices
 18 you've probably seen, it's not there.
 19 **Q.** Was this a --
 20 **THE SOLICITOR:** Sorry, can I just interrupt?
 21 *(Off mic)*
 22 **MR BEER:** Sorry sir, you won't be able to hear.
 23 **THE SOLICITOR:** Sorry, can I say something there?
 24 **MR BEER:** Hold on. Mr Singh's solicitor has just
 25 said:

5

1 **A.** Yes, I think yesterday we discussed it, yes.
 2 **Q.** Was there a statutory basis for the Post Office
 3 issuing cautions to suspected offenders?
 4 **A.** I'm sorry, I don't understand. I mean the
 5 normal -- what do you mean, "statutory" -- it's
 6 something that we considered, yes. I mean,
 7 after the evidence, the next bit was whether
 8 there's an alternative way of dealing with it
 9 and -- in light of the public interest.
 10 **Q.** Where did the power come from for the Post
 11 Office to issue a caution?
 12 **A.** I -- I mean, I certainly -- we advised as to how
 13 it's given, who gives the caution, whether the
 14 police does it for the Post Office or the police
 15 got any statutory powers. I don't know.
 16 I can't -- I mean, maybe at that time I did know
 17 but what the system was or what the procedure
 18 was or what the basis was, certainly we did
 19 advise on cautions.
 20 I think in every single case we considered,
 21 it's always -- you know, the evidential test and
 22 then the public interest and public interest,
 23 one of them was the fact that there was
 24 alternative ways of dealing with it, rather
 25 than, you know, prosecution.

7

1 "I'm sorry, I don't think this document was
 2 provided before."
 3 I'll check whether that's so, and if
 4 Mr Singh needs any time at all to read it, he
 5 should have it.
 6 **SIR WYN WILLIAMS:** I agree.
 7 **THE SOLICITOR:** Thank you.
 8 **MR BEER:** Do you need time to read this document?
 9 **A.** Is that the only -- have you got quite a bit of
 10 papers?
 11 **Q.** I'm sorry?
 12 **A.** Have you got quite a bit of papers to go to the
 13 background to it? So can I have as much
 14 information as you've got?
 15 **Q.** I can certainly research that and come back to
 16 you later in the day or when you come back next
 17 year. If that would assist, I don't know at the
 18 moment whether this was a document that was
 19 provided or not. I can just check, however.
 20 Yes, it was part of the batch of documents
 21 that was provided last week, tab E92. So you
 22 have had it before. I'll move on.
 23 Were cautions an available outcome?
 24 **A.** Sorry?
 25 **Q.** Were cautions an available outcome?

6

1 **Q.** So was this a consistent practice over the
 2 entirety of the period that we are talking
 3 about, from August 1995 until, say, April 2012?
 4 **A.** You mean the consideration for caution?
 5 **Q.** Yes.
 6 **A.** Certainly on my cases, I had a checklist of --
 7 going through it, and one -- first the
 8 evidential test, then the public interest, and
 9 there was an alternative way of disposing of it,
 10 you know, without resorting to prosecution. But
 11 then a lot of the -- most of the -- the majority
 12 of the time is a breach of trust and the fact
 13 the amount of loss involved or amount of --
 14 yeah, amount of loss.
 15 **Q.** Was there a Post Office policy which regulated
 16 when and in what circumstances cautions should
 17 be offered to suspected offenders?
 18 **A.** I think we basically applied the Prosecutors
 19 Code, if it's in there, and certainly --
 20 **Q.** The Code for Crown Prosecutors?
 21 **A.** Yes, sorry.
 22 **Q.** That doesn't address cautions.
 23 **A.** But certainly I -- that's the -- maybe we -- in
 24 our training or the way we looked at the case,
 25 we certainly considered it. I mean --

8

1 Q. What were the relevant considerations in
2 deciding whether to offer a suspected offender
3 a caution?

4 A. Well, in any circumstances, in the sense that --
5 the amount involved, the recovery --

6 Q. Sorry the amount involved?

7 A. Yeah.

8 Q. So what was a permissible level of amount
9 involved for a caution and what was
10 impermissible amount?

11 A. I wouldn't -- well, it depends on the
12 circumstances, the whole circumstances of the
13 case but I think around about 5,000, I think,
14 is -- a figure of 5,000 comes to mind.

15 Q. So if it was below that amount then a caution
16 was permissible; is that right?

17 A. I think -- there was no strict figure but that
18 was the figure, I think, we -- the figure they
19 mentioned that we ought to pay more attention
20 to.

21 Q. The next thing you said was "and the recovery".
22 What does "and the recovery" mean?

23 A. Well, if it was a short period of offending or
24 it was just one-off offence or the circumstances
25 surround it, persons -- you know, the health

9

1 A. I think the -- and the family, I think, any
2 surrounding circumstances. Anything and
3 everything.

4 Q. Were there other considerations brought into
5 account? You said the amount of the loss,
6 whether it had been recovered, ie whether the
7 postmaster that paid it back, and the health of
8 the suspect and their family. In addition to
9 those three things, was anything else brought
10 into account?

11 A. Now, I don't know. I mean, I can't give you
12 definitive answer because it's such a long time
13 ago since I left the Post Office and left the --
14 prosecution generally. I've been doing other
15 things, as you know. I don't know the answer to
16 that.

17 Q. What about an admission --

18 A. Well, obviously --

19 Q. -- of guilt by the offender --

20 A. Well, it --

21 Q. -- which in the outside world, outside the Post
22 Office is --

23 A. Full and frank.

24 Q. -- a condition precedent to the issuing of
25 a caution?

11

1 issues, the -- or the personal --

2 Q. No, you're talking about different things now.

3 I was asking about the thing you just mentioned,
4 which was you said "and the recovery". What did
5 that mean?

6 A. Well, my -- money, if the money is repaid,
7 that's what it means.

8 Q. Was that a condition of issuing a caution?

9 A. No, there's no condition, it's a consideration.
10 That's the sort of --

11 Q. What was a consideration?

12 A. The amount lost and the amount recovered.

13 I think that was one of the bases of --

14 Q. So did the amount have to have been recovered in
15 order to issue a caution?

16 A. To be honest, this is going back a few years, or
17 lots of years, a number of years. I've been

18 doing other things. Now, I don't know and

19 you've probably put me on the spot, so

20 I don't -- I can't give you a definitive answer

21 on that. But certainly it was considered.

22 I think any case I dealt with is always --

23 I always played my mind to it.

24 Q. You went on to mention health; is that the

25 health of the suspected offender?

10

1 A. Full and frank admissions, yes, that is one of
2 it, isn't it, yeah?

3 Q. Is that a fourth thing, then?

4 A. Well, it's -- yes, it's -- yeah, it's important.

5 Yes. It's got to be, hasn't it?

6 Q. Can you remember any guidance or written
7 document that told you and the other senior
8 lawyers how to approach this issue?

9 A. I think it's certainly -- I don't know about
10 internal document or internal training now but,

11 certainly, the outside training, we had the

12 Central Law Training. We -- I certainly

13 regularly attended. There was the --

14 Q. Was that training about cautions?

15 A. Well, they -- some of the trainings were about
16 cautions, yes.

17 Q. So you received training from "Central Law", did
18 you say?

19 A. It's Central Law Training, you know, where you
20 get your CPD points each and every year.

21 Q. That was training about cautions?

22 A. Well, one of the topics would have been, I would

23 have thought, but, I mean, I can't tell you

24 which one. And then certainly chambers, I think

25 they did quite a lot of training, whether it was

12

1 on caution, but certainly on the subjects we
2 were sort of interested in. I don't know
3 whether that -- somebody mentioned it and it
4 meant they apply -- you know, they trained us on
5 that or what sort of considerations go in it.

6 But such a long time ago but we did -- there
7 was a lot of training but I don't know whether
8 there was actually a Post Office manual we
9 applied to. I mean, whether it was written down
10 internally, I can't really say one way or the
11 other whether it was or not.

12 **Q.** Was there a process that had to be gone through
13 for the authorising of a caution?

14 **A.** Well, that's something we -- we advised on or
15 recommended but, as to how it's applied,
16 I couldn't tell you. It's such a long time ago,
17 as to how they did it. But I think it's
18 certainly -- you know, the Security or the
19 Investigation Team carry that out -- well,
20 they're the ones who carried it forward as to
21 how they administered it, whether they had the
22 authority --

23 **Q.** Never mind the administering of it at the
24 moment, I'm thinking about who decided that
25 a caution was appropriate?

13

1 such a caution could be issued?

2 **A.** Well, I'm trying to think. As, you know, the
3 practicality of it -- it's just -- it's just too
4 long a period between the -- when I was advising
5 on it and since I left. I can't -- no, I don't
6 think I can help you with any more than what
7 I have.

8 **Q.** Thank you. Can I ask you some questions about
9 the duties of a prosecutor in relation to
10 an expert witness. Do you agree that
11 a prosecutor intending to rely on expert
12 evidence in criminal proceedings was under the
13 following duties: firstly, to satisfy themselves
14 as to the expert's relevant qualifications and
15 expertise?

16 **A.** Sorry, you've finished? Yes, sorry. Well, yes.
17 Are you going to read the -- I think you're
18 going to read the whole thing or are you --

19 **Q.** I could read out six things then you'd have to
20 remember them and say which of them you agreed
21 and which you didn't. It might be best if I did
22 them one by one.

23 **A.** Okay, sorry, yes.

24 **Q.** That's the first one.

25 **A.** Can you say it again, sorry?

15

1 **A.** Well, we -- it was obviously the Legal Team,

2 I think we --

3 **Q.** Who were the decision makers?

4 **A.** We recommended it. We didn't make the decision;
5 we recommended it.

6 **Q.** Okay, to whom did you recommend it?

7 **A.** To the Security Team, we passed it to the
8 Prosecution Support Office and who, in turn,
9 I think, passed it on to the decision maker or
10 the designate decision maker, I think.

11 **Q.** Would that designated decision maker have
12 changed over time? Sometimes it being somebody
13 in HR, I believe, and then it changed to being
14 the Head of Security?

15 **A.** It was -- well, you probably -- well, you --
16 that -- it probably -- yes, I think it probably
17 did, but what I'm saying is that we went to the
18 Prosecution Support Office, they in turn passed
19 it on to the appropriate person, whoever was the
20 designated authority at that particular moment
21 in time.

22 **Q.** So, as matters stand now, you can't help us with
23 the power that the Post Office used to issue
24 cautions to offenders nor whether there existed
25 guidelines regulating the circumstances in which

14

1 **Q.** Do you agree that a prosecutor was under a duty,
2 if they intended to rely on expert witness, to
3 satisfy themselves as to the expert's relevant
4 qualifications and experience?

5 **A.** Yes, yes.

6 **Q.** Secondly, a prosecutor was required to satisfy
7 themselves that the expert had been
8 appropriately instructed including by the
9 provision of a written and detailed letter or
10 email of instruction or terms of reference?

11 **A.** Yes, yes.

12 **Q.** Thirdly, the prosecutor was under a duty to
13 provide the expert, within those instructions,
14 as to what it is that his or her opinion was
15 sought about, and should set out the issues or
16 questions that they were expecting the expert to
17 answer?

18 **A.** Generally, yes.

19 **Q.** Fourthly, they were under a duty to provide
20 explicit guidance as to what the expert was
21 being asked to do and what material they were
22 being asked to consider, in order to undertake
23 that task?

24 **A.** Yes, yes.

25 **Q.** Fifthly, a prosecutor was under a duty to set

16

1 out the material upon which reliance had been
 2 placed in the prosecution and which of that
 3 material may be relevant to the questions which
 4 the expert was being expected to answer?
 5 **A.** Yes.
 6 **Q.** Sixthly, a prosecutor was under a duty to inform
 7 the expert as to the expert's relevant duties?
 8 **A.** Yes.
 9 **Q.** Would you agree that, even those experts who
 10 were trained, accustomed and made their living
 11 by giving expert evidence, a prosecutor had to
 12 make the expert sure that they understood what
 13 the expert's duties and obligations were?
 14 **A.** Yes, yes.
 15 **Q.** Would you agree that there was a duty on
 16 a prosecutor to satisfy themselves that the
 17 expert had understood that they owed duties to
 18 the court and that in their work and their
 19 report they had complied with their duties to
 20 the court?
 21 **A.** Yes, yes. Yes, of course.
 22 **Q.** Would you agree that a prosecutor at all
 23 relevant times was under a duty to satisfy
 24 themselves that any material or literature of
 25 which the prosecutor was aware and which might

17

1 **A.** No.
 2 **Q.** Including in Seema Misra's case?
 3 **A.** Well, that, again, I think you've seen my
 4 witness statement.
 5 **Q.** You say you didn't treat him as an expert, it
 6 was the court that did it?
 7 **A.** No, I'm not saying anything. All I said was
 8 that he came as the only person who could assist
 9 with the workings and operation of the Horizon
 10 system and I think, as the matter progressed, it
 11 became apparent that the only way the defence
 12 experts can function or are able to do his
 13 duties, or advise the -- or assist the court,
 14 was with the assistance of the guy who was --
 15 the assistance of the Fujitsu employee who knew
 16 the system very well, because it's a very, very
 17 specialist system, so you'd need a special
 18 knowledge. You can't just have anybody come in
 19 to be able to understand it and then actually
 20 assist the court.
 21 **Q.** We're going to come back to that big topic in
 22 a moment, whether you treated Mr Jenkins as
 23 an expert or not?
 24 **A.** Yes, of course, yes.
 25 **Q.** Would you agree that in terms of inclusions in

19

1 undermine the expert's opinion, was reviewed by
 2 the prosecution and, if relevant, disclosed to
 3 the expert?
 4 **A.** Yes.
 5 **Q.** Would you agree that these duties needed to be
 6 satisfied in order that the prosecutor could be
 7 satisfied that the expert evidence was
 8 admissible in court, ie these were conditions of
 9 admissibility, rather than just written
 10 requirements that it was nice to achieve?
 11 **A.** Yes, yes.
 12 **Q.** So these went to admissibility?
 13 **A.** Yes, I agree.
 14 **Q.** Did you, in your work, have all of those duties
 15 in mind when you were advising on files and
 16 acting as a prosecutor?
 17 **A.** I'm trying to think. I don't -- apart from one
 18 case, which, again, I've never instructed
 19 an expert in any of my cases --
 20 **Q.** In the --
 21 **A.** In the Post Office.
 22 **Q.** In the Post Office, you never instructed
 23 an expert?
 24 **A.** No.
 25 **Q.** Never relied on expert evidence?

18

1 an expert report that, by 2006, the following
 2 matters were necessary conclusions in an expert
 3 report:
 4 Firstly, details of the expert's academic
 5 and professional qualifications, experience and
 6 accreditation, insofar as they are relevant to
 7 the opinions expressed in the report?
 8 **A.** It's something that I think we very much heavily
 9 would have relied on advice from counsel.
 10 Certainly, I think that's as far as I can take
 11 it, because -- the only time -- but I think you
 12 said you -- you said you were going to come to
 13 that topic in a minute -- that's one of the
 14 reasons why we relied very heavily on counsel
 15 because we used their vast experience in other
 16 cases, not just the Post Office cases, but
 17 outside, because a lot of our counsel were very
 18 experienced and knowledgeable about prosecuting
 19 for the CPS and other bodies.
 20 **Q.** I'm asking you whether you knew yourself that,
 21 certainly by 2006, an expert report needed to
 22 include details of the expert's academic and
 23 professional qualifications, their experience
 24 and accreditation that was relevant to the
 25 opinions expressed in the report?

20

1 A. Well, yeah, I would have thought that was
2 obvious, yes.

3 Q. So, yes, you did?

4 A. I did but, as to the -- I've instructed,
5 I think, experts in the civil matters but,
6 certainly, in the criminal matters, that was the
7 first experience of it, I think, and I've never
8 even had a defence expert's report on any of my
9 cases.

10 Q. So Professor McLachlan, he wasn't an expert --

11 A. Well, no, we're not talking about that yet. You
12 said you were coming to it. But, certainly,
13 I saw his reports over and over again, but
14 you're talking about in general terms, aren't
15 you, or are you saying --

16 Q. I'm asking you whether you knew that both the
17 common law and the Civil Procedure Rules
18 Part 33, which came into effect in November
19 2006, said that an expert report had to contain
20 details of an expert's academic and professional
21 qualifications, their experience, and their
22 accreditation, insofar as it was relevant to the
23 evidence that they were going to give?

24 SIR WYN WILLIAMS: Before you answer, Mr Beer,
25 I think there was a slip of the tongue. You

21

1 setting out a substance of the instructions that
2 the expert had received, the questions upon
3 which their opinion was sought, the materials
4 that they had been provided, the documents,
5 statements, evidence, information and
6 assumptions, which were material to the opinions
7 expressed within the report?

8 A. In general terms but then, if I was going to
9 instruct an expert, then I would have had
10 a conference or got advice from counsel, read
11 around the topic. But, as to the knowledge,
12 it's not something I would have retained
13 readily. I mean, like any new experience or
14 anything I would have done, which I've not done
15 before, certainly I'd have read around it, got
16 to know it very well, and then had probably
17 sought counsel's advice before doing it.

18 But it's the -- as to -- I don't know what
19 you're asking in -- I knew -- obviously in
20 general terms, I probably knew quite a lot. But
21 when it actually come to specifics then I would
22 have sat down and worked it out, and then sought
23 advice, and maybe sought advice from other
24 experienced lawyers within the Criminal Law
25 Team, and I think I would have gone to, you

23

1 said, "Civil Rules", did you mean Criminal
2 Rules?

3 MR BEER: I meant the Criminal Procedure Rules, yes,
4 thank you, sir.

5 A. I think I had generally read about it, like
6 I said, and also I did repeat -- I did read the
7 defence expert's reports. Certainly was all
8 there. As to whether that was something of
9 a second nature to me, I would say no, purely
10 because I've never had a case where I had to
11 instruct an agent -- instruct an expert in the
12 criminal proceedings.

13 Q. Did you know that, by that time, 2006, the law
14 required a report to include a statement of the
15 range and extent of the expertise of the expert
16 and any limitations that they identified as to
17 their expertise?

18 A. I don't know. I mean, I'm trying to think what
19 I knew at that year, the time period I was
20 employed by the Post Office. But, certainly, if
21 I was instructing an agent -- instructing
22 an expert, I would have done a research around
23 it as to what my obligations were.

24 Q. Did you know that, by that time, the law
25 required an expert report to contain a statement

22

1 know, the Head of Criminal Law Team to say,
2 "Look, this what I'm doing, is there pointers
3 I need to know?" And then I would have directed
4 my mind to it.

5 And, certainly, before embarking on anything
6 of that nature, that's my background,
7 experience, and reading around it, and then
8 going to counsel. That's what we would do.

9 Q. Did you know that, by 2006, the law required
10 a report where there was a range of opinion in
11 the matters dealt with by the expert to include
12 a summary of the range of opinion and the
13 reasons for the opinion given by the expert
14 within that range?

15 A. I don't know, I mean, I -- to that. I mean,
16 I wouldn't know anything like that to -- maybe
17 to that detail. I can't say one way or the
18 other but, certainly, if I was going to --
19 instruct an agent -- instruct an expert, then
20 I would have been able to bring my knowledge up
21 to date to that level but, I mean, it's not
22 something I would have retained because it's not
23 something I would have used on a daily basis.

24 Q. Did you know that, by 2006, an expert report was
25 required by the law to include relevant extracts

24

1 of literature or other material that may be of
 2 assistance to the court?
 3 **A.** Again, same answer. Again, I would have -- if
 4 I was going to instruct an expert, that's what
 5 I would have done and, certainly, I would have
 6 a back-up of an opinion or advice from counsel.
 7 **Q.** Lastly on this, did you understand that by 2006
 8 the law required an expert report to contain
 9 a statement to the effect that the expert had
 10 complied with their duties to the court to
 11 provide independent assistance, by way of
 12 objective and unbiased opinion, in relation to
 13 the matters within their expertise and
 14 an acknowledgement that the expert would inform
 15 the parties and, where appropriate, the court,
 16 in the event that his or her opinion changed on
 17 any material issue?
 18 **A.** In general terms, yes, but then, as I said
 19 before, before instructing an expert, I would
 20 have got to know it in detail and, certainly,
 21 I would have got advice and opinion as to what
 22 needs to go into the expert's report and, also,
 23 as and when the expert need to be told about.
 24 Well, when the expert is instructed, I would
 25 have included that, in his instructions.

25

1 a specialist system and he -- assisting the
 2 prosecution, the defence and the court, into
 3 understanding how the system worked or the
 4 operation of the system. I think that's why and
 5 how he came into advising, he came in as
 6 somebody who knew the system well.
 7 **Q.** So I think you agree that none of the witness
 8 statements --
 9 **A.** No.
 10 **Q.** -- supplied by Mr Jenkins and relied upon by the
 11 Post Office in the case against Mrs Misra
 12 included any of the necessary elements that
 13 I have just listed?
 14 **A.** Yeah, purely because he was (*sic*) instructed as
 15 an expert.
 16 **Q.** I'm sorry?
 17 **A.** He was not instructed as an expert.
 18 **Q.** I think, as a matter of generality before we
 19 come to the detail, you would therefore agree
 20 that you did not provide Mr Jenkins with any
 21 instructions as to the duties of an expert?
 22 **A.** No.
 23 **Q.** You did not provide Mr Jenkins with any
 24 instructions as to the need to document, for
 25 example, the work carried out by him and by

27

1 **Q.** Would you that have understood at this time that
 2 the requirements that I've just listed went to
 3 the substance of the expert's opinion and
 4 weren't merely box ticking exercises that had to
 5 be complied with on the pieces of paper written
 6 by the expert? These went to whether the expert
 7 understood their duties and had approached their
 8 task, compliant with their duties and,
 9 therefore, this was a question of admissibility?
 10 **A.** I think the answer would be the same as before,
 11 because it's not something I would do on a daily
 12 basis, it's something I have not done within the
 13 prosecution -- whilst prosecution for the Post
 14 Office.
 15 **Q.** Before embarking on the detailed evidence, can
 16 we agree on the following: firstly, in the case
 17 of Seema Misra, no witness statement relied upon
 18 by the Post Office from Mr Jenkins included any
 19 of the necessary conclusions required by the
 20 common law and the Criminal Procedure Rules that
 21 I've just listed?
 22 **A.** No, because I -- he wasn't -- he wasn't -- he
 23 didn't come in as an expert, in the sense of
 24 an expert; he was an expert who was experienced
 25 in the system in itself because it's such

26

1 others, which formed any part of the evidence
 2 that he was to give?
 3 **A.** No, purely because he came in as a witness of
 4 fact. He was put forward or recommended by
 5 Fujitsu as the best person who can answer or
 6 advise the prosecution and, in turn, the
 7 defence, and I think all he did was to -- the
 8 questions posed by the defence expert to assist
 9 him to understand the system.
 10 **Q.** I think it follows that you did not provide
 11 Mr Jenkins with any sort of document or schedule
 12 upon which he should record, for example, the
 13 material that he had considered in order to form
 14 his expert view?
 15 **A.** I don't know what material you -- what material
 16 I'm supposed to provide. It's like -- the way
 17 the whole -- he came into being was purely --
 18 whatever information we had from the defence
 19 expert, and he was basically forwarding it on to
 20 him to respond to it, like any other witness.
 21 He -- I didn't take any witness statement from
 22 him and I don't think I've actually physically
 23 met him until -- from now, from the documents
 24 the Inquiry has provided me with, I think the
 25 first time was probably in a conference round

28

1 about October and I think two or three weeks
2 before, prior to the actually -- actual trial.

3 The normal practice of the Post Office was
4 not the solicitor to take a witness statement
5 but to the Investigation Officer to do so, and
6 that's how it worked out. Certainly, the
7 defence solicitors would send their enquiries,
8 and I think -- and I think maybe once they've
9 put forward the challenge to the Horizon system,
10 they instructed their expert, they in turn put
11 forward these reports, plus further enquiry --
12 further enquiries. That went to the
13 Investigation Officer.

14 He, in turn -- this is -- this information
15 needed to be dealt with by Fujitsu and I think
16 there was in place some sort of procedure,
17 system, or process in place that needed to be
18 followed and I think, because of the time
19 constraints or certain -- we needed to respond
20 within a certain period of time, that's when
21 I phoned or got in touch with the Prosecution
22 Support Office, Fujitsu's Prosecution Support
23 Office, and they said, "No, you've got to follow
24 certain procedures", which was would be time
25 consuming, and just to escalate the matters,

29

1 "Look, Mr Jenkins, as you're going to be giving
2 expert evidence, it's necessary for you to
3 record, in order that we, the prosecution, can
4 disclose, the work that you carry out in order
5 to form your expert view, including a record of
6 who you spoke to and communications that you
7 received from others, insofar as they end up
8 being part of your report."

9 **A.** At that --

10 **Q.** You didn't say that?

11 **A.** No, well, at that stage, he wasn't considered as
12 an expert. He was just more or less responding
13 to the expert's report or enquiries, or their
14 questions, if you like, because he was the
15 only -- he was put forward as the person who
16 could deal with them. So he was -- you know, he
17 was like any other witness. He would have him
18 called to give evidence.

19 **Q.** Do you have conferences with any other witness?
20 Do you sit down with witnesses of fact and
21 custody their fact and custody their evidence
22 with them, a couple of weeks before trial in
23 a barristers' chambers?

24 **A.** Well, we didn't have any trials. I mean,
25 certainly, I --

31

1 I was given a phone number for the Head of Legal
2 at Fujitsu who I contacted and he recommended
3 Mr Jenkins. That's how he came into being.

4 **Q.** Mr Singh, can I cut through this. I am just
5 asking you at the moment whether you provided
6 instructions, reminders to Mr Jenkins of duties
7 that I have outlined, instructions as to the
8 need to document work carried out by him or by
9 others that was going to form a part of his
10 evidence, with a schedule or work record that
11 detailed the material that he had considered as
12 part of his work.

13 I think your answer is "No, because I didn't
14 think he was an expert"?

15 **A.** No, well, I think you followed it up and you
16 presumably wanted me to elaborate, but yes --
17 well, if -- no. That's right. You're right.

18 **Q.** I think it follows that there's no
19 documentary --

20 **A.** No, because we didn't have any documents at that
21 time. What documents could we have provided?
22 So I didn't have any documents that --

23 **Q.** I think you're misunderstanding me. I'm asking
24 whether you approached Mr Jenkins on the basis
25 that he was an expert and then said to him,

30

1 **Q.** Sorry? No, I'm talking about Seema Misra.

2 You've told us you attended a conference with
3 counsel Warwick Tatford in October 2010 and
4 Mr Jenkins was present, which you mentioned
5 earlier.

6 **A.** Yes.

7 **Q.** Was it usual for you to sit down with witnesses
8 of fact and chat through their evidence with
9 them?

10 **A.** I think, it depended very much on the case.

11 **Q.** So you would sometimes chat through a witness's
12 evidence with them in a prosecution?

13 **A.** I think some of the times, some of the -- these
14 areas, certainly we did, in the sense that
15 trying to understand the actual system or the,
16 you know, the technical aspect of it, I think.
17 I don't know, maybe it's a -- I can't --
18 I mean -- I think -- I'm sure we have.

19 **Q.** Presumably you would want to keep a pretty
20 careful record, if you were chatting through the
21 evidence of a witness of fact a couple of weeks
22 before trial, wouldn't you?

23 **A.** Well, certainly but, I mean, you know, certainly
24 the Investigation Officers, I -- to be honest --
25 I can't -- I can't recall exactly where we were,

32

1 how we dealt with it now, but certainly I always
2 had my notepad with me.

3 **Q.** Or is the fact that you met Mr Jenkins in
4 consultation with counsel a couple of weeks --

5 **A.** But I haven't taken any papers with me from the
6 Post Office when I left. Everything is there.

7 **Q.** Hold on, I haven't asked the question yet.

8 **A.** Well, that's where you're coming from -- okay,
9 ask the question.

10 **Q.** Just wait and see.

11 **A.** Okay, all right.

12 **Q.** Is the fact that you were attending
13 a consultation or conference with counsel, with
14 Mr Jenkins, a couple of weeks before trial,
15 an indication that, in fact, you treated him as
16 an expert witness because that's what one might
17 do with an expert witness --

18 **A.** I --

19 **Q.** -- rather than a witness of fact? Pretty
20 unusual to sit down with prosecution counsel and
21 chat through a witness of fact's evidence, isn't
22 it?

23 **A.** I can't really tell you how these came about.
24 I think certainly counsel asked for
25 a conference, and I -- again, I think in --

33

1 didn't -- he was never instructed as an agent
2 from the outset -- as an expert, sorry, by --
3 I'm trying to think at the same time as --
4 because his speciality was -- or his expertise
5 was very, very specific, very specialist, and
6 that was the special tailor-made system for the
7 Post Office, which his employer provided for the
8 Post Office.

9 So he wasn't -- I think that's where we
10 were -- that's where we were confused.

11 **Q.** What were you confused about?

12 **A.** Confused as to whether he came as an expert or
13 as fact, because he was basically, literally
14 assisting and assisting the defence expert,
15 because the defence expert was not an expert on
16 the Horizon system, if I can put it that way.

17 **Q.** Did you feel confused at the time?

18 **A.** I don't know. I mean, I -- I wasn't confused in
19 the sense of I think you mean, certainly I'm
20 not, like I said to you, in these particular
21 circumstances or in this particular incident,
22 I've never instructed an expert for the Post
23 Office in these circumstances -- in this
24 incident, so I was new to it in that sense,
25 because it wasn't second nature.

35

1 originally, I didn't -- I mean, it was such
2 a long time ago, I didn't actually put it in my
3 witness statement and I think you provided
4 further papers, and I think, and then I think
5 Mr Jenkins was nice to put, you know, "Nice to
6 meet you", and all the rest of it, and then
7 I started remembering there was a conference.

8 As to how that came about or why, what the
9 circumstances were, I couldn't tell you. But
10 certainly, yeah, I mean we got a very
11 experienced counsel who had been dealing with
12 not just the Post Office cases but wide
13 experience of the prosecution for the CPS. He
14 would have been well aware and he would have
15 made me well aware as to what I needed to do, as
16 well as him -- his duties, and I think he must
17 have -- either the specifics of him being, you
18 know, his duties, my duties, we would have done
19 that. But --

20 **Q.** I think it's right that there's no documentary
21 record to which you can point that confirms that
22 Mr Jenkins understood, to your understanding,
23 any relevant expert duties that he owed to the
24 court; is that right?

25 **A.** Well, it follows, because, as I say, we -- he

34

1 If you'd been dealing with something, you
2 know, on a regular basis you would have
3 everything in place. I would have had to
4 basically start from scratch and work out the
5 particular terms, or the law, so to speak, as to
6 my duties, duty of the expert, because I don't
7 think any within -- anybody within the Criminal
8 Law Team had actually instructed an expert in
9 that sense.

10 **Q.** Can we look at your witness statement, please,
11 at page 24, paragraph 69, please. If we scroll
12 down, thank you. You say:

13 "In the *Misra* case the defence expert raised
14 questions. I contacted the Investigation and
15 Security Team to ask whether they could answer
16 these questions. I was told the request needed
17 to be made in writing and it could take weeks
18 for a response. I was worried that the normal
19 systems and procedures for obtaining information
20 from Fujitsu would be too slow and so I also
21 contacted David Jones, Head of Legal at Fujitsu,
22 to escalate the request so it would be dealt
23 with as quickly as possible to comply with the
24 court order. Subsequently, Gareth Jenkins was
25 put forward to deal with the defence requests as

36

1 someone who was in a position to deal with the
2 issues raised by the defence expert, but
3 I understand that his role was initially limited
4 to that of a lay witness who knew the Horizon
5 system well. As far as I can recall, the Post
6 Office did not seek to rely on him as an expert
7 witness or at least initially. Subsequently,
8 due to his expertise and qualifications, the
9 court considered him an expert."

10 Do you see that?

11 **A.** Yes.

12 **Q.** So you're saying that you and others in the Post
13 Office did not seek to rely on him as an expert
14 witness, at least initially, but the court did.

15 **A.** Well, I think, isn't that what --

16 **Q.** Is that correct? Is that what you're saying?

17 **A.** Yeah, isn't that what I've been --

18 **Q.** Right, good.

19 **A.** -- saying all along to you, in any case.

20 I don't think that's any different to what I've
21 just been telling you.

22 **Q.** If we can turn, please, to page 67, paragraph
23 198, you say:

24 "Initially, I did not consider Mr Jenkins to
25 be acting as an expert but to be brought in as

37

1 **Q.** Is that what you think I'm doing?

2 **A.** No, I'm --

3 **Q.** I'm just reading out parts of your witness
4 statement.

5 **A.** Maybe I'm -- let me think, then. Let me think
6 quietly to myself. I was thinking loud. Maybe
7 it's not the place to think loud. Let me put it
8 differently to you, then.

9 **Q.** Just so you can refocus on the question.

10 **A.** Yes.

11 **Q.** In two paragraphs in your witness statement you
12 said:

13 "Initially, I did not consider him to be
14 acting as an expert ..."

15 **A.** Yeah.

16 **Q.** My question is: does it follow that later,
17 ie after the initial bit had finished, you did
18 consider him to be an expert?

19 **A.** Only as an expert in the Horizon system, because
20 we did not have anybody else to -- who had that
21 specialist experience into the operation of it,
22 the workings of it and, also, even to analyse
23 the transaction logs. And I think, overall, in
24 the scheme of things, in the case itself, he --
25 and in turn, because of his expertise and

39

1 a lay witness with technical knowledge who could
2 respond to matters raised by the defence
3 expert."

4 Then at the end, you say:

5 "However, this was an unusual case in that
6 he was not regard by the prosecution as
7 an expert witness but from recollection went on
8 to be treated as an expert by the court."

9 In both of those paragraphs, you say that
10 initially you did not treat him as an expert
11 witness, agreed?

12 **A.** Yes.

13 **Q.** In both of those paragraphs, you say that he,
14 Mr Jenkins, was treated by the court as
15 an expert, agreed?

16 **A.** Well, that's what I say, but --

17 **Q.** Yes.

18 **A.** Yes.

19 **Q.** So, if you initially did not consider him to be
20 acting as an expert, it follows, doesn't it,
21 that there came a stage when you did consider
22 him to be an expert, agreed?

23 **A.** Not -- not by -- I don't -- I don't -- it's
24 difficult because I think you're -- it's very
25 easy to play with words but in the --

38

1 knowledge, he was able to bring the defence
2 expert to a level where he could actually
3 understand the system --

4 **Q.** Mr Singh, in these two paragraphs you're dealing
5 with Mr Jenkins' status --

6 **A.** Yes --

7 **Q.** -- as to whether he was a lay witness or
8 an expert witness. In both paragraphs, you say,
9 initially, you did not consider him to be acting
10 as an expert witness.

11 **A.** Well, I -- I think throughout --

12 **Q.** But then, and I'm asking you, after that initial
13 period had passed, did you treat him as
14 an expert witness?

15 **A.** Okay, can I share something with you? There
16 would -- I -- the way this should have come
17 about or the way I visualised it, was that there
18 would come a stage where we would get
19 an external expert, whereby the -- Mr Jenkins
20 would be able to assist our expert -- our
21 independent expert. I think that's probably
22 true meaning, where we should have done, but, at
23 the same time, I think I was relying very much
24 on the expertise and the knowledge and
25 experience of our counsel, and that didn't come

40

1 together.
 2 But, initially, I think it would have
 3 been -- I think maybe the way it should have
 4 been done would have been -- maybe we would have
 5 got another professor in, I don't know. But
 6 certainly here, he did -- in the true meaning of
 7 the word, he didn't come in as an expert. Maybe
 8 here -- it was very difficult to put it into
 9 words what I was trying to say, but he was
 10 treated as a witness of fact all the way
 11 through, up to including the trial.

12 But maybe it should have been done
 13 differently, he should have been -- we should
 14 have got another professor in, from the outset,
 15 as an independent expert but then who would have
 16 instructed him? Who would understand the
 17 system? Who would -- it was that sort of
 18 real-world problem --

19 Q. Can we go back to page 24, please, paragraph 69
 20 at the bottom, last sentence:

21 "Subsequently, due to his expertise and
 22 qualifications, the Court considered him
 23 an expert."

24 Did the Post Office argue against the
 25 court's treatment of Mr Jenkins as an expert?

41

1 A. How do you mean?

2 Q. Well, one moment he's a witness of fact in the
 3 person who's calling him as a witness, and then
 4 the court is treating him as an expert. Was he
 5 informed of his change of status?

6 A. He basically was treated as somebody who knew
 7 the system well because that's more or less what
 8 the court's issue in the case was and I think,
 9 as you would be aware, if it -- I think the
 10 judge actually said to the defence expert and
 11 Mr Jenkins to have as much meeting, as much time
 12 as possible, with a view to narrowing the
 13 issues, to a point where there was actually
 14 a joint report, which both these gentlemen
 15 agreed to.

16 Q. Is that normal, in your experience, for the
 17 court to order two parties to meet, one of whom
 18 is an expert and the other who is a lay witness
 19 of fact, and to produce a statement of agreement
 20 and disagreement or a joint report?

21 A. Well, I've just said that I think it's -- we've
 22 been -- for the last few minutes, I've told you.
 23 This is the first experience in the Post Office
 24 cases I've ever had, and I think I was very much
 25 relying on, you know, our barrister. And

43

1 A. Not to my knowledge. I wasn't in court.

2 Certainly, we were represented by a very
 3 experienced knowledgeable counsel and,
 4 certainly, he was instructed by the
 5 Investigation Officers that were there and
 6 I think one of our legal executives was there.
 7 I didn't get any -- anything to -- anything like
 8 that, that we said "No, no, he's an expert, he's
 9 only an expert of fact".

10 Q. So did the Post Office acquiesce in the court's
 11 treatment of him as an expert?

12 A. I don't know. I mean, I can't answer that.

13 I mean --

14 Q. When did the court subsequently consider him
 15 an expert?

16 A. Well, that was -- I -- I -- well, maybe it was
 17 wrong. I, you know, doing this statement after
 18 a long period -- the conclusion or the case has
 19 been concluded, it was a difficult one. I would
 20 have --

21 Q. From when? What moment did the court treat him
 22 as an expert?

23 A. I don't know. I can't answer that.

24 Q. Was Mr Jenkins made aware of the change in
 25 status that he had enjoyed?

42

1 basically saying "No, no, no, we can't use him".

2 I mean, if he said to me, right from the outset,
 3 "Jarnail, we can't use him", then I would have
 4 stopped at that moment and see if we can have --
 5 try to find an expert outside, you know, who was
 6 basically a professional expert -- you know, who
 7 gave evidence in court.

8 But this was the only person that we were --
 9 or who was put forward who knew the system very
 10 well, because these is -- this was a very, very
 11 specialist system. Only person who could
 12 actually -- not only assist the court, but
 13 actually went on to assist the defence expert.

14 Q. In this paragraph, you refer to the normal
 15 systems and procedures for obtaining information
 16 from Fujitsu. What were the normal systems and
 17 procedures for obtaining information from
 18 Fujitsu?

19 A. I think I'm maybe the wrong person to ask.
 20 I don't know to that, because I'm not -- wasn't
 21 privy to the contract or the even the
 22 relationships. I didn't know people like Penny
 23 Thomas existed, you know, the Prosecution
 24 Support Office, who was basically --

25 Q. You say here that you were worried that the

44

1 normal systems and procedures would be too slow?
 2 **A.** Yes.
 3 **Q.** So you must have understood what they were?
 4 **A.** What they were was when the Investigation
 5 Officer said, "Jarnail, this can't be done,
 6 we've got to do this, we've got to do that",
 7 that's when I got hold of Penny Thomas and
 8 I think there came a time when she actually --
 9 I think sent me some email as to what the Post
 10 Office needed to do, and I think that's what we
 11 were discussing yesterday, weren't we, when we
 12 were trying to get information from them?
 13 But like anything in life, they probably
 14 have got set procedures and systems in place,
 15 because we -- I've never used them, it wasn't
 16 something that I was aware of, intimately.
 17 I knew probably there would be because, you
 18 know, theirs is a contractual, commercial
 19 relationship between two parties: Fujitsu and
 20 the Post Office.
 21 But as mine is a legal -- is, you know, of
 22 the prosecution solicitor in-house, something
 23 that I didn't use, I wouldn't be aware of in
 24 detail. I mean, I would know in general terms
 25 because there would be some relationship, there

45

1 **Q.** I'd appreciate it if you would focus on my
 2 question rather than talking about other stuff.
 3 **A.** Okay, fine. Okay.
 4 **Q.** Was it from the moment that the judge directed
 5 a timetable for the service of expert reports
 6 and that the experts should meet and produce
 7 a statement of areas of agreement and
 8 disagreement that you treated Mr Jenkins as
 9 an expert?
 10 **A.** No.
 11 **Q.** So despite the court treating him as
 12 an expert --
 13 **A.** No.
 14 **Q.** -- you did not?
 15 **A.** At that time, I'm talking about -- no, no.
 16 Mr -- I'm talking -- I'm maybe at cross
 17 purposes. The time and the dates I'm talking
 18 about, Mr Jenkins didn't exist. I didn't know
 19 anything about -- I didn't know Mr Jenkins.
 20 **Q.** Okay, let's talk about the thing I'm talking
 21 about.
 22 **A.** Okay.
 23 **Q.** When the court directed a timetable for the
 24 production of expert reports and directed that
 25 the experts should meet to produce statements of

47

1 would be something in writing, some contract or
 2 agreement, but I can't tell you now as to what
 3 they were and, even at that stage, I wasn't
 4 aware of it.
 5 All I was trying to do, from a practical
 6 point of view, from an empirical point of view,
 7 from the real-world point of view, was trying to
 8 get this thing moving because it's in court, and
 9 the judge had to give directions, you know,
 10 a timetable as to certain things needed to be
 11 done.
 12 **Q.** By the experts?
 13 **A.** Yes, I -- well, yeah --
 14 **Q.** So was it from that moment, from when the judge
 15 gave directions as to the service of expert
 16 reports and the meeting of experts, that you
 17 treated Mr Jenkins as an expert?
 18 **A.** Well, we couldn't find any experts in the outer
 19 world who knew the statement and I did look.
 20 I --
 21 **Q.** No, my question -- and I would really appreciate
 22 it if you would --
 23 **A.** Sorry, let me --
 24 **Q.** No, hold on --
 25 **A.** No, let me --

46

1 agreement and disagreement, from that moment on,
 2 did you treat Mr Jenkins as an expert?
 3 **A.** What date are you -- we talking about? What are
 4 you -- because there's a date where they --
 5 or --
 6 **Q.** Autumn 2009.
 7 **A.** I think if you've -- I think that they wanted
 8 the experts report but we didn't have an expert
 9 at this time --
 10 **Q.** No, when the court issued -- we're going to come
 11 to them later, I'm just asking you on this at
 12 the moment, we're going to come to look at all
 13 of these documents at the moment, but when, in
 14 autumn 2009, the court issued directions that
 15 mentioned experts on each side, after that
 16 point, did you treat Mr Jenkins as an expert?
 17 **A.** No, because Mr --
 18 **Q.** Why not?
 19 **A.** Mr Jenkins wasn't there. Mr Jenkins only came
 20 around about February time.
 21 **Q.** So did you know that Mr Jenkins, as an employee
 22 of Fujitsu and somebody who worked day-to-day on
 23 Horizon, was a person where the prosecution,
 24 perhaps more than in other circumstances, needed
 25 to ensure that he understood his duties to the

48

1 court?

2 **A.** Well, obviously I knew he was an employee

3 because he was recommended by Head of Legal for

4 Fujitsu, by his employer.

5 **Q.** What about the second bit of the question, then?

6 **A.** What's that?

7 **Q.** Did you know that it was all the more

8 important -- he wasn't somebody that enjoyed

9 functional independence, he wasn't

10 independent -- that it was all the more

11 important that you should ensure that he

12 understood his duties to the court?

13 **A.** Well, you're posing this question, about 10, 15,

14 20 years after. The fact that the -- the focus

15 there --

16 **Q.** 13, I think.

17 **A.** Well, whatever, 13, then. At that moment,

18 I think my other primary concern was to find

19 somebody who knew this very special, specialist

20 system, who knew the system and, as, when the

21 directions were given, around about December --

22 I don't know whether it was December or --

23 I don't know what the actual dates were, but the

24 year 2009, say, obviously my concern or the Post

25 Office's concerns should have been -- because

49

1 have brought in somebody from -- externally, who

2 was an independent, a bit like the defence

3 expert, to take it all the way to the court as

4 an independent. And that's when the duties

5 you've -- under the common law and under

6 statute, would have come into play. That's when

7 we would have formulated it in a sort of --

8 well, if he was a professional expert --

9 **SIR WYN WILLIAMS:** Mr Singh, I'm sorry to interrupt

10 you but you just told me in one part of a very

11 long answer that you were looking for an expert

12 to deal with the issues arising from Horizon.

13 You told me that you were unable to find such

14 a person and, therefore, Mr Jenkins was

15 introduced to you. What better evidence do

16 I need for the fact that Mr Jenkins was

17 an expert than that which you've just said?

18 **A.** Well, sir, I understand that but then the --

19 **SIR WYN WILLIAMS:** Well, then if you understand it,

20 will you concentrate on Mr Beer's questions and

21 answer them a bit more succinctly, please.

22 **A.** Sir, it's very difficult to work something in my

23 head as quickly as Mr Beer can, because I'm up

24 at an age and I've been out of practice such

25 a long time --

51

1 I did sort of generally let it be known that

2 this is where we are, we need to get an expert

3 to explain the system.

4 And I think the Head of Legal, Rob Wilson,

5 said "Well, we've never had anybody", and

6 I think a few others, Juliet McFarlane, who was

7 basically a head or leading the subpostmasters'

8 cases, she couldn't come up with a name.

9 I looked in the Law Society Gazette for

10 an expert, and I think I went further afield,

11 I think I spoke to a university or -- and they

12 didn't know the system well.

13 And I think that's where David Jones'

14 recommendation of Mr Jenkins came in to being

15 and he came in as somebody who knew the system

16 well. There was obviously -- you know, he's

17 an employee of the employer. Yes, of course,

18 I mean, you know, that follows, then, doesn't

19 it -- well, it doesn't follow but, obviously,

20 yes, I would have been aware of that. But that

21 wasn't the prime consideration.

22 The first consideration was like any person

23 who could assist the prosecution and the court,

24 and then, I think, was to understand the system

25 at that stage and maybe at that stage, we should

50

1 **SIR WYN WILLIAMS:** Well, take a breath before you

2 answer, think about your answer --

3 **A.** I will, sir --

4 **SIR WYN WILLIAMS:** -- and then answer --

5 **A.** Is there any way I can have a pen and paper and

6 I can sort of do that because I can't --

7 **SIR WYN WILLIAMS:** Let's have a morning break and

8 let Mr Singh have some paper and pen to prepare

9 himself.

10 **A.** That's very kind, sir. I'm very grateful.

11 Thank you.

12 **MR BEER:** Sir, can we say 11.25, please.

13 **SIR WYN WILLIAMS:** Yes.

14 **(11.11 am)**

15 **(A short break)**

16 **(11.25 am)**

17 **MR BEER:** Good morning, sir, can you continue to see

18 and hear us?

19 **SIR WYN WILLIAMS:** Yes, thank you, yes.

20 **MR BEER:** I'm pleased to say Mr Singh has now got

21 both a pen and --

22 **A.** Thank you very much.

23 **Q.** -- paper.

24 Can we turn to your witness statement at

25 page 25, please, paragraph 70, fourth line.

52

1 You're dealing here with the conference that you
2 referred to earlier in October 2010 and you say,
3 in the fourth line:

4 "As far as I can recall ..."

5 Then you corrected this to:

6 "... I had more involvement with Mr Jenkins.

7 I cannot recall any discussions where he was
8 informed of his duties to the court although
9 I would have assumed counsel would have informed
10 him of the same."

11 If you were not treating Mr Jenkins as
12 an expert witness, why did he need to be
13 informed of duties that he owed to the court?

14 **A.** Well, it's such a long time ago, there's been
15 a lot of papers which the Inquiry has provided
16 to me. I honestly can't say that but,
17 certainly, as far as I was concerned, he was
18 a normal witness who was -- who knew this
19 particular system, which the court needed
20 assistance with, and so did the prosecution and
21 the defence as to -- again, an assumption,
22 an assumption from reading the papers.

23 I don't know the ins and outs, don't forget
24 I'd been out -- I've not -- I've not been out --
25 I've been not doing prosecutions for a long

53

1 on?

2 **A.** Yeah.

3 **Q.** You say in your email:

4 "Thinking about choice of expert in this
5 case."

6 That's the Wylie case, okay?

7 "I have in the past instructed Gareth
8 Jenkins of Fujitsu in the case of *Misra*, which
9 [incidentally] was the only challenge on
10 Horizon. He provided expertise in dealing with
11 defence's boundless enquiry into the whole
12 system. Perhaps we need to reconsider whether
13 to instruct him as he may be viewed to a close
14 to the system but instruct.

15 "Somebody entirely independent? Your
16 thoughts please ..."

17 You say there "I have in the past instructed
18 Gareth Jenkins of Fujitsu in the *Misra* case";
19 that's true, isn't it? You instructed Gareth
20 Jenkins in the *Misra* case.

21 **A.** Well, instruct -- well, I --

22 **Q.** Is that true?

23 **A.** He was put forward. I mean, I didn't -- well,
24 what instructions have I given him? That's the
25 whole point. He gave instructions to our

55

1 period of time. At that time, I would have
2 known, because I attended a lot of courses,
3 I had a lot of the papers with me but, at that
4 particular moment in time, when I am making
5 these witness statements, is relying on a lot of
6 the information, and I'm trying to summarise or
7 be as brief as possible. So I can't honestly
8 answer you why I said what I did.

9 **Q.** So your position is that you, at no stage,
10 treated Mr Jenkins as an expert witness, but the
11 court did, correct?

12 **A.** I -- yeah, he was somebody who was there to help
13 and assist like any normal witness would do.

14 **Q.** Can we look, please, at POL00020489. Thank you.
15 If we scroll to the middle email, thank you.

16 A bit further down.

17 Dealing with a different case here in 2012,
18 September 2012, do you see? You're engaged in
19 a discussion about the choice of expert for it,
20 with Mr Flemington, Mr Bolc, Martin Smith and
21 Harry Bowyer; yes, can you see that?

22 **A.** Yes, cc'd by Andy Cash, I think was --

23 **Q.** Yes, the email is directly to Andy Cash?

24 **A.** Yes, it's about a discussion with him.

25 **Q.** So this is about a different case it's two years

54

1 Investigation Officer, I didn't take any.

2 I never instructed him as such.

3 **Q.** Why did you say, if you had never instructed
4 him, "I have instructed him"?

5 **A.** It's terminology, it's wording. Maybe it's
6 clumsy wording. But then, when you're -- this
7 is a while back. This is going back. You're
8 writing something out under pressure. Now,
9 looking at it now, it was clumsy. It shouldn't
10 have been. "In the past, we have used as
11 a witness", or something like that, maybe
12 something -- the word "instructed", in that
13 sense, is probably --

14 **Q.** You agree that the language that you used is
15 suggestive of you viewing Mr Jenkins as
16 an expert witness?

17 **A.** It's clumsy. I --

18 **Q.** No, just focus on the question. You agree that
19 the language you used in this email is
20 suggestive of you viewing Mr Jenkins as
21 an expert witness?

22 **A.** It's -- I --

23 **Q.** Yes?

24 **A.** The meaning isn't in that sense that he's
25 instructed as an expert --

56

1 Q. Does a solicitor ever instruct a witness of
2 fact?
3 A. No, but, I mean --
4 Q. Does a solicitor instruct an expert?
5 A. Yes.
6 Q. You said you "instructed Mr Jenkins". Agreed?
7 A. I think maybe -- that's the wrong word.
8 Q. Why did you use it?
9 A. I -- well, this is -- you know, 12 September '12
10 at 15.36, and now we are '23. So I don't know.
11 I mean, I can't put my hand on heart and tell
12 one way or the other but it's clumsy, it
13 shouldn't --
14 Q. Let's look at POL00031352. This is an email
15 from you to Hugh Flemington and others, dated
16 1 July 2013, with the subject of "Discuss of
17 defect in Horizon in court Seema Misra and Lee
18 Castleton", yes?
19 A. Yes, yes. Sorry, yes.
20 Q. Then if we scroll down, please, paragraph 3 --
21 if that can be highlighted -- you say in your
22 email:
23 "We instructed our own expert, Gareth
24 Jenkins, from Fujitsu."
25 If you did not instruct Mr Jenkins as

57

1 instructed Mr Jenkins as an expert when you say
2 that's exactly what you didn't do?
3 A. The reality is, I attended a lot of courses.
4 I -- at that particular --
5 Q. That document can come down, by the way.
6 Sorry, you were telling us about courses you
7 attended.
8 A. Yeah, I knew at that time what my
9 responsibilities and duties were. Mr Jenkins,
10 as I explained to you, at that time came in as
11 somebody who knew the system very well, better
12 than anybody else, and he could assist the
13 prosecution, the defence and the court, and
14 that's what he did and he didn't come in as
15 an expert in anything apart from being an expert
16 in the system itself.
17 Q. That explains what you now say. I'm asking you
18 to explain why, in these emails that I've just
19 looked at, you say, "I instructed Gareth
20 Jenkins" and "We instructed own expert, Gareth
21 Jenkins", when you say that's precisely what you
22 didn't do?
23 A. I --
24 Q. You say it's just clumsiness?
25 A. Clumsiness, laziness, you name it, but it's --

59

1 an expert, why did you say "We instructed"
2 Mr Jenkins as an expert?
3 A. Clumsy. It shouldn't have been. It's wrong.
4 I can't explain to you. I mean, this is years
5 on. He was -- if you -- the best I can put it
6 to you, he was expert -- or he knew the system,
7 Fujitsu, like no other person and he was there
8 to assist all parties, prosecution, defence and
9 the court.
10 Q. Isn't the reality of the position that you
11 either didn't understand what the duties were in
12 relation to the treatment of a person as
13 an expert witness or you simply didn't care
14 enough to see what those duties were and ensure
15 that they were discharged and that, after the
16 fact, you've invented this idea that you were
17 treating Mr Jenkins as a witness of fact
18 throughout and not an expert, to cover for the
19 fact that you very well know that you complied
20 with none of the duties that you owed to him?
21 A. None of what you said is true.
22 Q. So why --
23 A. I don't agree with it.
24 Q. Why have I been able to find two emails in which
25 you have said, in black and white, that you

58

1 he, I think --
2 Q. Why were you being lazy?
3 A. I think it's probably the day-to-day pressures
4 and I think the other thing is, like any good
5 lawyer, is that you need to --
6 Q. Use language precisely?
7 A. Well, maybe I should have been more precise and
8 concise. Maybe I'm probably being more informal
9 because it's internal. But, certainly, he was
10 not -- if I -- if the witness statement, that's
11 what I -- is what I've signed up to and that's
12 what I did, and I can't even say why you are
13 asking me that when I've got that witness
14 statement here to that fact that he wasn't
15 instructed as an expert from beginning to end,
16 not by me, and that's the reason why a lot of
17 the -- you know, the statute, common law terms
18 and conditions were not put in that way because
19 he didn't do any of that.
20 All he did, he came in and he explained the
21 Horizon system.
22 Q. So you say you've got a witness statement saying
23 he wasn't an expert?
24 A. No, no.
25 Q. Is that your witness statement?

60

1 A. This what I'm telling you, this is --
 2 Q. Just because you're saying it in a witness
 3 statement, doesn't mean it's true, is it?
 4 A. Why not? That's why I believed. That's why
 5 I signed up to.
 6 Q. Right. Okay, got it. So you're saying that
 7 because it's in the witness statement you're
 8 pointing to on the desk there, it can't be the
 9 case that you treated Mr Jenkins as an expert?
 10 A. No. No.
 11 Q. Aren't you just covering up the fact that --
 12 A. No, no.
 13 Q. -- that you know that he was treated --
 14 A. Why would I cover up -- no, no.
 15 Q. Because know that you complied with none of the
 16 duties that you owed as a prosecutor, so you've
 17 rewritten history.
 18 A. No.
 19 Q. You said, "I didn't treat him as an expert at
 20 all. He was a witness of fact throughout",
 21 despite how you've described him in these two
 22 emails and despite the fact that you attended
 23 a conference with counsel with him and chatted
 24 through his evidence.
 25 A. I don't know -- I mean, I don't know where you

61

1 with the Horizon system. Warwick Tatford has
 2 asked that the problems with Horizon that he has
 3 raised in his report are replied to in a witness
 4 statement form. I presume that an employee of
 5 Fujitsu would have to produce the witness
 6 statement.
 7 "In addition to this, the defence have also
 8 requested the following information ..."
 9 Yes?
 10 A. Yes.
 11 Q. Can you help with why it was the Investigator,
 12 rather than you who was seeking a response to
 13 the expert evidence?
 14 A. I honestly don't know. I can't help you with
 15 that.
 16 Q. Was that usual, that the Investigator would
 17 commission evidence like this from Fujitsu
 18 rather than you doing it?
 19 A. I don't know. I mean, I can't explain it. It's
 20 such a long time ago. I mean, I can't really --
 21 I've been out of this area of law. I can't
 22 really deal with too much detail you're looking
 23 into. I can't help you.
 24 Q. But would you agree that, at the moment here,
 25 the communication from the Investigator is not

63

1 get that we chatted through his evidence. I --
 2 Q. What did you do? Did you sit there in silence?
 3 A. I've no recollection of what -- I mean, I don't
 4 know whether you -- but there's a --
 5 an attendance note to that --
 6 Q. No, that's significant. We haven't had
 7 disclosed to us an attendance note of what
 8 happened at the October 2010 conference.
 9 A. Well, as I said to you, when I left the Post
 10 Office I didn't take any papers with me. So
 11 I can't tell you -- can't assist you any
 12 further.
 13 Q. Can we turn, then, to the unfolding
 14 correspondence over the Seema Misra case and
 15 Mr Jenkins' involvement in it and start with
 16 FUJ00152843. This appears to be the first
 17 communications concerning what was eventually to
 18 be Mr Jenkins' witness statements. What I'm
 19 going to do is track through they how came to be
 20 provided. Okay?
 21 This is an email exchange, I think, not
 22 involving you, from Mr Longman. He says:
 23 "Jane
 24 "I attach a report from the defence expert
 25 where he has highlighted a number of problems

62

1 treating Mr Jenkins' evidence as potentially
 2 expert evidence. It's asking for a reply to
 3 expert evidence in a witness statement.
 4 A. Yes.
 5 Q. You're not copied into this, I think?
 6 A. No. No.
 7 Q. Now, at the same time as this was going on, can
 8 we look, please, at POL00053723. Can you see
 9 this is dated -- sorry, if we scroll down,
 10 please -- 11 December 2009. Mark Dinsdale, can
 11 you remember who he was?
 12 A. I don't know, one of the Investigation Officers
 13 I think, but I've --
 14 Q. Okay.
 15 A. -- whether I've had direct instructions from
 16 him, I don't know.
 17 Q. He emails Mr Wilson:
 18 "Rob, I am looking for a bit of guidance on
 19 this request from Jon Longman in respect of
 20 Seema Misra."
 21 That's the one we've just looked at.
 22 A. Yes.
 23 Q. "This is a huge piece of work that could
 24 potentially wrap up my team for weeks and then
 25 only to be asked more questions of a similar

64

1 nature. I have also concerns over the types of
2 questions that are being asked and whether we
3 can actually provide the information ...

4 "We are a new team and would really
5 appreciate your guidance on this, on how to move
6 this one forwards. Are these questions that
7 yourselves need to answer from a legal
8 perspective? Clearly some of these questions
9 are so unspecified, that we could be dragging up
10 Horizon reports for almost every branch over
11 a ten-year period for every single week in
12 [question].

13 "I hope you can help provide some advice and
14 guidance on this one. Thank you."

15 Then if we scroll up, please, you send that
16 on to Warwick Tatford. You reference the email
17 and say:

18 "... he raises number of queries and wants
19 solutions to the disclosure which have in my
20 view unreasonably and unnecessarily been raised
21 by the Defence."

22 You seek advice and you say:

23 "This may have a wider implication for the
24 business and ... look forward to receiving [his]
25 advice as soon as possible."

65

1 A. I can't answer that. I don't know, you know,
2 years on.

3 Q. Can we see what Mr Tatford said when he replied,
4 POL00044557. This is Mr Tatford's advice. Take
5 it from me it is dated 5 January 2010.

6 A. Yes.

7 Q. If we can go to paragraph 6 and 7, please, which
8 I think is on page 2. He says:

9 "... I would wish some further enquiries to
10 be made from Fujitsu. Paragraph 23 of the
11 *Castleton* judgment refers to the evidence of
12 Anne Chambers. When she was cross-examined she
13 appears to have had knowledge of an error in
14 Horizon that had occurred at Callendar Square in
15 Falkirk ...

16 "I have seen some civil paperwork in
17 relation to Alan Brown but not concerning
18 a Horizon error. I don't know if Anne Chambers
19 still works for Fujitsu but it should be
20 relatively straightforward for Fujitsu to
21 provide full information about what appears to
22 have been a well-known problem at Callendar
23 Square."

24 Then 7:

25 "I think our disclosure duty requires us to

67

1 Can you explain, in relation to this
2 request, why you regarded the defence request as
3 unreasonable and unnecessary?

4 A. I can't. Because I don't know what information
5 they're requiring.

6 Q. If we scroll down, we can look at it. It's at
7 the foot of the page, it starts with (1):

8 "Please find attached a statement from
9 Eleanor Nixon ... please provide the following
10 information ..."

11 Then over the page. If you read that slowly
12 to yourself, and then scroll down. If you read
13 (2) and (3) to yourself, and then scroll down.

14 There's a reference to some other cases,
15 including *Macdonald* and *Hosi*.

16 Then over the page:

17 "Please provide details of:

18 "Post offices, past and present, that have
19 experienced losses with the Horizon system.

20 "Prosecutions, past and present, that have
21 been brought for theft or false accounting, as
22 a result of alleged losses."

23 Let's go up to page 1. Why did you regard
24 the defence request as unreasonable and
25 unnecessary?

66

1 ask Fujitsu whether they are aware of any other
2 Horizon error that has been found at any other
3 sub post office".

4 Then he says:

5 "I anticipate that there will be none but it
6 is important that the check is made."

7 Before approaching Fujitsu, would you agree
8 that, as the prosecutor, the Post Office was
9 under a duty to disclose any information which
10 it, the Post Office, held about, firstly, the
11 Callendar Square bug, or, secondly, awareness of
12 any other Horizon errors that had been found at
13 any sub post office?

14 A. Certainly, if it undermines the prosecution case
15 and it assisted the defence, that's what the
16 test is.

17 Q. So what did you do, then, to obtain from the
18 Post Office itself, before going to Fujitsu,
19 documents falling within either of those
20 categories?

21 A. I don't recall what I did or didn't do. I mean,
22 it's years ago. I can't tell you chapter and
23 verse what we did or didn't do. I can't answer
24 that, you know, 10/12 years on, I --

25 Q. Did you ever consider that the Post Office

68

1 itself owed disclosure duties of the kind that
2 I've mentioned, before turning to Fujitsu,
3 ie looking within itself at all departments or
4 branches within the Post Office for information
5 that tended to suggest that there were errors
6 within Horizon capable of affecting the
7 integrity of financial accounts?

8 **A.** Again, I can't answer that but, certainly, it
9 would have been highlighted to the team
10 internally.

11 **Q.** How would it have been highlighted to the team
12 internally?

13 **A.** Certainly, this advice would have gone to the
14 Head of Criminal Law Team. And then I would
15 have got -- seek guidance -- directions from it
16 as to how we go about doing it. But, I mean,
17 I can't --

18 **Q.** I'm asking about a different thing at the
19 moment. I'm asking about, before you go to
20 Fujitsu and asking them whether they have got
21 information about Horizon integrity issues, to
22 use a portmanteau phrase --

23 **A.** Yes.

24 **Q.** -- whether you went to anyone within the Post
25 Office to see whether there was such

69

1 years ago.

2 **Q.** But on the separate issue of -- let's put aside
3 what documents the Post Office has got going to
4 each of these two points. When we turn to
5 a third party, Mr Tatford is advising that the
6 corporation be approached in relation to both
7 issues, not that Mr Jenkins be approached in
8 relation to both issues?

9 **A.** Yes.

10 **Q.** Agreed?

11 **A.** Yes.

12 **Q.** Can we go on, please, to FUJ00152887. We're now
13 at 27 January 2010. This is a communication
14 from Mr Longman to Fujitsu, Penny Thomas in
15 Fujitsu. Can you see he says:

16 "Our defence barrister has asked for all of
17 Gareth's replies in relation to the defence's
18 second interim report to be produced as
19 a witness statement. I would suggest that the
20 question from the defence is reproduced and then
21 Gareth's replies are recorded immediately after
22 for clarity purposes."

23 Then there's some timing issues.

24 Again, why was Mr Longman, rather than you,
25 communicating with Fujitsu as to the evidence

71

1 information?

2 **A.** I don't know. I mean, I can't tell you what he
3 did. It was so many years ago. But certainly
4 we got -- certainly, if we had the information,
5 we would have considered it and we would have
6 dealt with it.

7 **Q.** You see the way that Mr Tatford has expressed
8 himself here --

9 **A.** Mm.

10 **Q.** -- would you agree that he is asking that
11 enquiries be made of Fujitsu, the corporation,
12 on both fronts, not enquiries be made of
13 Mr Jenkins?

14 **A.** Yes, that's what he implied -- well, that's what
15 he's saying or that's what he's saying, but it
16 doesn't mean to say that we haven't carried out
17 internal enquiries. But I can't tell you what
18 we -- how we went about doing that. I don't
19 know the answer to that question, I don't
20 recall. I mean, as to how we went about doing
21 it.

22 But, certainly, if we had the information or
23 we would have sought it, I suppose. But
24 I don't -- I can't answer that. I can't give
25 you, you know -- so I don't recall now, so many

70

1 that needed to be sought?

2 **A.** That's the Post Office system. That's what we
3 did. I mean, even the -- certainly in private
4 practice, I took -- or the solicitor or his
5 assistant, if you like, or his personal
6 representative took the witness statements but
7 in Post Office, ever since I've been there, it
8 was always the Investigation Officer who did
9 the -- did that. And -- but, in these
10 circumstances, I don't know. That's -- that's
11 what the process was.

12 **Q.** You're not even copied in on this, so this is
13 going on without your knowledge; is that right?

14 **A.** Isn't that -- I can't, I don't, I mean, I'm not
15 copied into this particular one. I don't know
16 whether he sent me anything else. I can't
17 recall, I don't remember.

18 **Q.** Let's go on to POL00053745. You can see that
19 you're the author of this memo.

20 **A.** Mm.

21 **Q.** It's addressed to Post Office Security, with
22 a copy to the Investigator, Mr Longman. You
23 say:

24 "I now enclose Counsel Warwick Tatford's
25 advice and would be grateful if you would kindly

72

1 please deal with the outstanding matters with
2 regard to the disclosure which the defence are
3 seeking and should deal with it paragraph by
4 paragraph so it is probably easier to deal
5 with."

6 Yes?

7 **A.** Yes.

8 **Q.** So, essentially, you're postboxing on counsel's
9 advice, saying "Can you, please, Investigator,
10 deal with it all"?

11 **A.** I think that's -- that's how we -- that's what
12 the process was. We didn't -- was to actually
13 send the advice to the Investigation Officer not
14 to -- I mean, there's certain bits he obviously
15 couldn't deal, which we would have dealt with or
16 somebody else he could -- who would have
17 knowledge of. But that the way the system or
18 the process worked. I mean, I can't say any
19 more than that but, I mean ...

20 **Q.** You remember Mr Dinsdale had raised questions
21 about the scope of the disclosure that the
22 defence were seeking?

23 **A.** Yes.

24 **Q.** You had commented that it was unreasonable and
25 unnecessary. Then Mr Tatford had advised that

73

1 Investigation Officers -- to say, "Look, Mark
2 it's been dealt with", or, "I'm dealing with
3 it".

4 **Q.** So you faithfully sent on counsels's advice to
5 Mr Longman, yes, agreed?

6 **A.** That's what? Yes. I mean, yes, that's what I'm
7 doing.

8 **Q.** You'll remember that Mr Tatford had advised:
9 "Our disclosure duties require us to ask
10 Fujitsu whether they're aware of any other
11 Horizon error that has been found at any sub
12 post office."

13 Remember?

14 **A.** Yes.

15 **Q.** If we just go back, please, to FUJ00152887, and
16 scroll down. This email from Mr Longman to
17 Penny Thomas in Fujitsu doesn't include that
18 question, does it?

19 **A.** What question, sorry?

20 **Q.** Let's try and look at two questions on the
21 screen at the same time to try to help you. Can
22 we have on the left-hand side POL00044557, and
23 look at the second page of the left-hand
24 document -- sorry, third page. Can you read
25 paragraph 7:

75

1 these are the things you need to do. Where you
2 say in the last line or the penultimate line,
3 "Please advise Mark Dinsdale accordingly", were
4 you telling Mr Longman that he should feed back
5 to Mark Dinsdale the response to his concerns of
6 the parameters of the defence's disclosure
7 requests?

8 You weren't responding to Mr Dinsdale
9 yourself, "This what I think, this what counsel
10 thinks about the disclosure requests, it's going
11 to tie up the department, it's going to grind
12 work to a halt". You were saying, "Here's the
13 advice, you, Jon Longman, tell Dinsdale that's
14 the outcome". Correct?

15 **A.** I don't know, I mean, at that particular moment
16 in time, I don't know where we were or what we
17 were thinking but it's presumably just a simple
18 thing, "Well, look, Mark, I've got counsel's
19 advice, I'm dealing with it", you know, just to
20 keep him informed, and say "Well, look, it's
21 been dealt with" or "It's in hand".

22 I mean, I can't tell you precisely. I don't
23 know the answer to that, as to, you know, what
24 you're asking me about that. But all I'm saying
25 is that, you know, they presumably, both

74

1 "I think our disclosure duty requires us to
2 ask Fujitsu whether they are aware of any other
3 Horizon error that has been found at any sub
4 post office."

5 Yes?

6 **A.** Yes.

7 **Q.** Then look at the email on the right-hand side:
8 what was, in fact, communicated to Fujitsu.

9 **A.** Yes.

10 **Q.** It doesn't include that, does?

11 **A.** What's he attaching? "See attached below",
12 I don't know -- to be produced as ... is that --

13 **Q.** That's Professor McLachlan's second interim
14 report?

15 **A.** Oh, yes, sorry. It's not there. Yeah.

16 I confirm. Yeah, I agree.

17 **Q.** That's a significant omission, isn't it?

18 **A.** I -- yes. Yeah.

19 **Q.** Prosecution counsel has said that "The
20 prosecutor's disclosure duties require us to ask
21 Fujitsu whether they're aware of any other
22 Horizon error at any sub post office", and that
23 question is not asked there, is it?

24 **A.** No, it doesn't appear to be, no.

25 **Q.** All of this was going on without your knowledge,

76

1 wasn't it? You just weren't involved in it,
 2 were you?
 3 **A.** I'm not copied in.
 4 **Q.** Why was it going on without your knowledge?
 5 **A.** I'm not -- I can't answer that, I don't know
 6 why. But that's -- I can't answer that.
 7 I don't know. I don't recall.
 8 **Q.** Can we go to POL00044553, please. This is your
 9 letter -- if we just go to the last page, see
 10 you signed it off, go to the first page,
 11 please -- of 27 January to the defence
 12 solicitor, Issy Hogg:
 13 "Counsel is drafting his response to the
 14 Section 8 disclosure application."
 15 Turning to the request for further
 16 disclosure. Scroll down, please. You deal with
 17 the contract, training.
 18 Over the page, please. You respond to
 19 investigations.
 20 Scroll down, please, and scroll down again.
 21 Under "Horizon System", you say:
 22 "We can understand why you would want to see
 23 specific areas of the Horizon data. Your expert
 24 will want to check his theories against the
 25 relevant data. Your client will also presumably

77

1 **A.** Um --
 2 **Q.** Would that be the Investigator?
 3 **A.** Um ... um, that's what it says. I mean, it
 4 wouldn't be -- I wouldn't be doing it on my own
 5 back. It would be instructions come from The
 6 Investigation Security Team, via Jon Longman.
 7 As to who authorised it, presumably he has
 8 spoken to Fujitsu and who are happy to do it.
 9 So --
 10 **Q.** Would your understanding -- and, after all, this
 11 is your letter -- be that such Fujitsu
 12 representatives who attended such a meeting
 13 would be attending the meeting in the capacity
 14 as operators of the system with some knowledge
 15 of it, or attending such a meeting as instructed
 16 expert witnesses?
 17 **A.** I don't know what you're asking me here.
 18 I mean, if you break it down a little bit,
 19 because this is years on. I mean, I'm trying to
 20 assist the Inquiry as much as I can. I don't,
 21 you know, know the case now in as much detail as
 22 I did at that particular moment in time.
 23 So if you break it up, then certainly I can
 24 help, otherwise I can't recall as to precisely
 25 the nature of that communication as to -- but

79

1 be able to direct you through specific types of
 2 transactions where she feels errors may have
 3 occurred. We do not understand how your expert
 4 will be assisted by being presented with
 5 a mountain of data covering five years."
 6 You say that:
 7 "Horizon has undergone stringent testing
 8 before it was installed."
 9 Then, over the page, please, and then under
 10 19, you say in the second part of it:
 11 "The Investigation Officer Jon Longman said
 12 he is preparing to meet the Defence Expert with
 13 one or more representatives from Fujitsu to
 14 discuss technical issues and reach as much
 15 agreement as possible. This will obviously
 16 avoid much wasted time. Could you consider the
 17 point and revert back to [you]."
 18 So you were making an offer that Mr Longman
 19 would meet the defence expert with some
 20 representatives of Fujitsu to discuss technical
 21 issues, correct?
 22 **A.** Well, that's my instructions. It's not
 23 something I arranged. It was something I was
 24 instructed to put forward.
 25 **Q.** Who instructed you?

78

1 I can tell you it would be something, you know,
 2 like any client instructing a solicitor to do,
 3 and that's why I'm putting it forward to the
 4 defence solicitor.
 5 **Q.** So can I take from that, that you would just
 6 relay instructions, you didn't apply your mind
 7 what's happening here: a defence expert coming
 8 in to the premises of the operators of our
 9 system and meeting them? What's really going on
 10 here? In what capacity are these
 11 representatives from Fujitsu meeting this
 12 defence expert?
 13 You would have just forwarded, essentially,
 14 what your instructions were?
 15 **A.** No. I don't know what I did at that particular
 16 moment in time, it's such a long time ago. But
 17 it certainly would have been discussed and
 18 considered. I mean, certainly Fujitsu wouldn't
 19 allow any person just to enter. There would be
 20 certain conditions as to it and I think it may
 21 just be -- I mean, maybe I shouldn't really
 22 speculate.
 23 I honestly cannot assist and help the
 24 Inquiry with that but, certainly, it would be
 25 considered. It wouldn't be post and paste job

80

1 saying "Well, look -- you're welcome to do
2 this". It's not as simple as that.
3 **Q.** Okay, we'll move on. 1 February, please.
4 FUJ00152902. If we scroll down, please, so it's
5 over the page. Thank you. Jon Longman to Penny
6 Thomas:

7 "At a pre-court hearing today, the judge
8 ordered that all the dense requests for further
9 information be answered by 4.00 pm on Monday,
10 8 February.

11 "Our solicitor in the case has asked that
12 Gareth's statement is completed by Wednesday of
13 this week so that he and our barrister can
14 examine the statement."

15 Just stopping there: the solicitor in the
16 case, that would be you, would it?

17 **A.** Yeah, yeah.

18 **Q.** "Gareth's statement needs to cover the following
19 four points:

20 "1) Our defence barrister has asked for all
21 of Gareth's replies in relation to the defence's
22 second interim report to be produced as
23 a witness statement."

24 That's essentially repeating the email we
25 saw earlier.

81

1 you -- I can't recall word for word what that
2 was but, if you bring the other one up and then
3 you can see there is a difference, there is
4 a marked difference.

5 **Q.** Let's do the left-hand/right-hand side thing
6 again. Left-hand side, POL00044557, page 3,
7 paragraph 7.

8 **A.** *(The witness read to himself)*

9 **Q.** Compare paragraph 7, left side, to paragraph 3.

10 **A.** There appears to be something missing, isn't
11 there? I don't know what?

12 Oh, yes. Yes. That Horizon error should
13 have been in there, yes.

14 **Q.** Sorry, I can't hear you?

15 **A.** Yes, there obviously is a difference, yeah --

16 **Q.** What differences do you notice?

17 **A.** Well, the Horizon errors. It doesn't say
18 anything about that, does it, Horizon system
19 that Fujitsu were aware of? It doesn't mention
20 errors.

21 **Q.** Well, the first thing is that the advice from
22 Mr Tatford is that it should be a request made
23 to Fujitsu, yes?

24 **A.** Yes.

25 **Q.** That's been translated into a request for

83

1 "2) My barrister telephoned me yesterday
2 evening and requested that I find out any
3 information that Fujitsu may hold relate to
4 an office called Callendar Square in Falkirk.
5 Apparently, Anne Chambers, assistant specialist
6 employed by Fujitsu, was cross-examined",
7 et cetera, et cetera.

8 "Our barrister would like Gareth to deal
9 with this matter and expand upon whatever issue
10 Anne Chambers raised at court."

11 So you remember, that reflected paragraph 6
12 of Mr Tatford's advice, agreed?

13 **A.** Well, I -- yes, yeah.

14 **Q.** Okay. Then, next, third:

15 "When Gareth completes his statement could
16 he also mention whether there are any known
17 problems with the Horizon system that Fujitsu
18 are aware of. If none, could this be clarified
19 in the statement."

20 That's different from what Mr Tatford had
21 advised, isn't it?

22 **A.** Yes, it is. Of course it is.

23 **Q.** What do you notice about the difference?

24 **A.** In hindsight, yes, but at that moment, I don't
25 know what it was. But, certainly, you know, if

82

1 a mention by an individual, namely Gareth
2 Jenkins. They're different things, aren't they?

3 **A.** Now, I'm looking at it with the time, careful
4 focus, yes.

5 **Q.** It's a watering down, isn't it?

6 **A.** It shouldn't have been but it did -- it is what
7 it is. To be honest, I -- now that we got the
8 time and being able to focus on it and you've
9 certainly highlighted it, yes. But I can't
10 recall what we did at that particular moment or
11 when -- or the way it came back, or whether we
12 did anything after that. I don't know. But
13 I can't explain that to you. Or I -- because
14 I don't remember. I don't recall.

15 **Q.** Did you have any input into how the question was
16 reformulated, that it was turned from a request
17 to ask Fujitsu, the corporation, of whether it
18 was aware of any other Horizon error in any sub
19 post office to a request to an individual to
20 mention if there are any known problems that
21 Fujitsu are aware of?

22 **A.** I don't recall.

23 **Q.** You don't recall whether you had any input into
24 the reformulation of the question?

25 **A.** That bit I obviously -- that is, you know, Jon

84

1 Longman's email. But, certainly, I don't recall
 2 what transpired after that.

3 **Q.** Do you agree that the request that's now
 4 directed to Mr Jenkins has conflated the
 5 separate issues of a response to the defence
 6 expert report and the Post Office's own response
 7 to the defence's request for disclosure, in
 8 respect of which Mr Tatford had advised?

9 **A.** So long -- I can't explain, because I haven't
 10 got the details or -- you know, 10 years on,
 11 12 years on, it's different. But, I mean,
 12 I can't answer that, I don't know to -- to your
 13 question. I don't recall and I can't really
 14 answer that.

15 **Q.** Were you aware at the time of a prosecutor's
 16 duties in respect of third-party disclosure or
 17 obtaining material from a third party?

18 **A.** What, you mean internally or generally; how do
 19 you mean?

20 **Q.** I'm afraid I can't express it any better than
 21 that, even if I rearrange the words in the
 22 sentence.

23 **A.** I don't -- at the moment, I can't tell you what
 24 the duties were. Maybe at that time, certainly
 25 I would have been but, I mean, to look at it in

85

1 **Q.** Would you agree that a prosecutor seeking
 2 disclosure from a third party should explain to
 3 the third party the nature of the duties that
 4 both it, the prosecutor and the third party,
 5 were under; give some guidance to it?

6 **A.** I don't know. I don't recall as to what we --
 7 what the relationship is here within Fujitsu in
 8 partnership. I mean, as I say, I don't -- not
 9 got involved in the contractual or commercial
 10 side of the business, as to how we went about
 11 getting information of Fujitsu and -- but,
 12 certainly, I -- you know, years on now, I can't
 13 tell you what I knew then or I didn't know at
 14 that particular moment in time. So I can't
 15 assist you any more than what I've just said.

16 **Q.** Do you agree that this watering down that we see
 17 here, essentially means that what was advice
 18 from counsel to ask a corporation whether it was
 19 aware of any other Horizon issue at any other
 20 sub post office, has been turned into a rather
 21 casual request to an individual that they might
 22 mention anything in their witness statement of
 23 problems of which Fujitsu was aware?

24 **A.** Well, that's what it appears to be but, as to
 25 what the reality was at that particular moment

87

1 that much depth and detail now, I -- I don't
 2 know. I mean, the answer to that, I don't
 3 recall where we --

4 **Q.** Would you agree that when a prosecutor is
 5 approaching a third-party, in order to assist
 6 it, the prosecutor, in discharging its
 7 disclosure obligations, it should explain to the
 8 third party that it is doing so and the
 9 importance of third party conducting enquiries
 10 itself that are both recorded and auditable in
 11 order that the prosecutor can then explain to
 12 the court what it has and hasn't done to
 13 discharge its disclosure obligations?

14 **A.** I can't recall as to whatever you're asking me;
 15 purely, at that time, I probably would --
 16 I would assume so, because I had been up to date
 17 with a lot of the legislation or a lot of the
 18 requirements, but I can't answer to you now,
 19 moving on, because all the information you
 20 provided.

21 And now it's completely different in the
 22 sense that I had the chance to look at it but
 23 even then I had -- my head is not -- the
 24 prosecution hat on it, or head on it, purely
 25 trying to assist the best I can the Inquiry.

86

1 years ago, I don't know. But, certainly,
 2 indeed, from the information you've given me,
 3 I can't really give you much depth, detailed --

4 **Q.** In any event, this didn't, on the face of it,
 5 amount to an instruction to Gareth Jenkins, as
 6 an expert witness in the case, did it?

7 **A.** Well, as you said, that email is not copied to
 8 me, so I'm not aware as to what the -- whether,
 9 you know, Gareth -- well, he's obviously saying
 10 Gareth Jenkins should deal with it but,
 11 certainly, I can't give you any more detail than
 12 the fact that I don't know.

13 **Q.** I mean, taking a step back, would you agree
 14 overall that what we've seen so far is that the
 15 Post Office appears to be proceeding on the
 16 basis that it needs some information from
 17 Fujitsu in order to disclose its obligations as
 18 a prosecutor by way of disclosure, and that has
 19 been conflated with a request being made to
 20 Mr Jenkins to provide a response to a defence
 21 expert report?

22 **A.** I --

23 **Q.** That's what it looks like, doesn't it?

24 **A.** Well, it looks that way but I can't say for sure
 25 as to -- a lot of the time, as the information

88

1 comes, and then you look at it and you review it
2 and then you, you know, flesh it out a little
3 bit more. I mean, that's our -- some of the
4 information is dealt with, but I can't really
5 assist you or the Inquiry any further than
6 what's in front of you.

7 **Q.** Can we move forward a few days to see when you
8 become directly involved, to 5 February 2010,
9 FUJ00122713. If we scroll down, please, can we
10 see at the foot of the page your email to David
11 Jones at 5 February, at 12.34, and you say,
12 "Dear Mr Jones", if we carry on down the page:

13 "I refer to our telephone conversations of 4
14 and 5 February 2010 with regard to the obtaining
15 of a witness statement of the defence
16 challenging the reliability of Horizon.

17 I understand that Mr Jenkins has been identified
18 as an experienced person to give this statement.

19 I would be grateful, after your meeting this
20 morning, if you could confirm to me when
21 Mr Jenkins would be back to return to duty after
22 his sick leave ..."

23 There's a court order with a deadline of the
24 8 February.

25 By this time, had you seen the exchanges of

89

1 It looks like there have been some problem
2 getting there:

3 "I met this morning with Gareth Jenkins who
4 came [back] into the office briefly to meet with
5 me. Gareth will help with this matter. His
6 input will be coordinated by Penny who is
7 responsible for delivery to [Post Office
8 Limited] of support in the Security area.

9 "Ahead is a first draft of a statement from
10 Gareth. I would like you to review it and
11 indicate if it answers the questions in the
12 detail you require.

13 "You will see that there are some areas
14 where Fujitsu cannot deal with the Defendant's
15 expert's criticisms as they are about [Post
16 Office Limited] procedures or requirements and
17 it seems evident that there will need to be
18 a [Post Office Limited] internal 'expert' who
19 can work with Gareth to deal with these areas.

20 "One concern is that [Post Office Limited]
21 have not apparently requested transaction data
22 for West Byfleet for the period and transactions
23 in question. This would normally be provided in
24 previous cases and would include Fujitsu
25 extracting log files from the system to enable

91

1 1 and 2 February that we'd looked at earlier?

2 **A.** I don't know. I mean, I -- I can't recall as to
3 where we are. You know --

4 **Q.** Just scroll down a little bit further. I think
5 that's the end. So this doesn't appear to
6 attach the chains that we've looked at earlier
7 of 1 and 2 February, with communications from
8 Mr Longman into Penny Thomas.

9 If we scroll back up to your email. It
10 seems like you spoke with Mr Jones on 4 and
11 5 February.

12 **A.** Yes.

13 **Q.** Why had you become involved at this stage?

14 **A.** I don't -- I don't -- I don't know, to be honest
15 with you. I don't recall as to -- all I know is
16 I've spoken to him and he's -- I've asked for
17 help, assistance with somebody who can help and
18 assist with the prosecution.

19 **Q.** Okay, if we scroll up, please --

20 **A.** That's about it. I mean, I don't know the ins
21 and outs of why not --

22 **Q.** -- and look at Mr Jones' reply:

23 "Jarnail,

24 "Thank you for your attached email -- which
25 I have now received!"

90

1 us to provide details of transactions.

2 Surprisingly, this has not been requested in
3 this case. Perhaps you would consider the need
4 for this."

5 So Mr Jones, the Head of Legal within
6 Fujitsu, is saying, firstly, that Mr Jenkins is
7 going to help you, he's enclosing a copy of
8 Mr Jenkins' statement and asking you to look at
9 it and see whether it answers the questions that
10 you require in the right detail. There's going
11 to be some things that he can't address, that
12 there needs to be somebody from within the Post
13 Office who can work with him to deal with those
14 areas, but there's a concern that transaction
15 data hasn't been requested and that's
16 surprising, agreed?

17 **A.** Yes.

18 **Q.** Mr Singh?

19 **A.** Oh, sorry.

20 **Q.** Yes?

21 **A.** Yeah, that's what it says.

22 **Q.** Okay. Can we look, please, at POL00029369. If
23 we scroll down, please, your email at 3.39 on
24 5 February. I'm so sorry, scroll down a bit
25 further. Thank you.

92

1 Your email sent by your secretary at 2.53 to
 2 Jon Longman and to Warwick Tatford. Can you see
 3 that?
 4 **A.** Yes.
 5 **Q.** "Dear John and Warwick,
 6 "Herewith statement from Gareth Jenkins.
 7 Just all of the press. Please let me have your
 8 comments and whether this is adequate for our
 9 purpose or does it require any additions before
 10 being served on the Defence."
 11 If we just scroll down a bit further, we can
 12 see that you sent them as well, Mr Longman and
 13 Mr Tatford, Mr Jones' email that we just looked
 14 at, yes?
 15 **A.** Sorry, say that again? Mr Jones' email?
 16 **Q.** Yes, you're forwarding, to Mr Tatford and
 17 Mr Longman, Mr Jones' email. You're giving them
 18 the first draft of the Gareth Jenkins statement?
 19 **A.** Yes, yes.
 20 **Q.** You're also giving them the text of Mr Jones'
 21 statement, raising the four issues that I've
 22 mentioned. Yes?
 23 **A.** Can you put two -- I don't know. I can't see
 24 the -- yes, okay, yeah. Yeah.
 25 **Q.** Then if we scroll up, please, and keep going.
 93

1 Then if we scroll up, please -- stop
 2 there -- Mr Tatford replies to you the next day:
 3 "[Mr Longman] sets out in his email below
 4 the extra matters I asked Mr Jenkins to look at.
 5 "The areas where Jenkins says 'for POL to
 6 respond' should be deleted. These will lead
 7 only to a flood of further disclosure requests
 8 and I am afraid that Post Office will never
 9 respond."
 10 But let's see what you did with Mr Longman's
 11 response, FUJ00122729.
 12 If you remember, you received the email at
 13 3.39 from Mr Longman. You say to Fujitsu,
 14 ie David Jones and Penny Thomas and Gareth
 15 Jenkins:
 16 "Dear David and Penny,
 17 "On first glance points 2-4 have not been
 18 answered which I reproduce below."
 19 Then you cut in points 2, 3 and 4 from
 20 Mr Longman's email; do you see that?
 21 **A.** Yes.
 22 **Q.** "Please give this matter your urgent attention.
 23 Look forward to hearing from you."
 24 So you were going back to Fujitsu here and
 25 saying, "We've asked you to mention whether
 95

1 Thank you, stop there.
 2 If we look at Mr Longman's reply to you,
 3 same day at 3.39. He says:
 4 "Jarnail.
 5 "Points 2-4 have not been answered which
 6 I reproduce below."
 7 So he's cutting in the request that he,
 8 Mr Longman, had made to Penny Thomas into
 9 an email to you and saying Mr Jenkins hasn't
 10 answered them. We can see them cut in, points
 11 2, 3 and 4. Point 2 is the Callendar Square bug
 12 in Falkirk, yes?
 13 **A.** Yes.
 14 **Q.** Point 3 is:
 15 "When Gareth completes his statement could
 16 he also mention whether there are any known
 17 problems with the Horizon system that Fujitsu
 18 are aware of. If none, could this be clarified
 19 in the statement."
 20 So what Mr Longman is telling you is that
 21 even the watered down request hasn't been
 22 addressed by Mr Jenkins in his draft statement,
 23 agreed?
 24 **A.** Yes.
 25 Then 4 isn't relevant for our purposes.
 94

1 there are any known problems with Horizon of
 2 which Fujitsu is aware, and you haven't answered
 3 the question". Was that a concern to you?
 4 **A.** I don't recall. I mean, I can't give you any
 5 reply to that. I obviously considered it at
 6 that particular moment in time, I think, as you
 7 know, straightaway, in trying to put something
 8 together, because there is time constraints on
 9 it.
 10 But I -- you know, I mean -- with these
 11 enquiries, with the papers, I haven't had time
 12 to, you know, reconsider to the detail you're
 13 asking me, so I am sorry, I can't help you as to
 14 what you're asking me, you know, years on,
 15 and --
 16 **Q.** What we've seen is a defence disclosure request
 17 being sent to prosecution counsel, him advising
 18 that a course of action needs to be taken. That
 19 course of action being watered down. That being
 20 sent to Fujitsu and Fujitsu not addressing it.
 21 Then you writing to them and saying, "You've not
 22 answered our questions", agreed?
 23 **A.** Yes, that's what -- yes.
 24 **Q.** Again, still at this point and looking at the
 25 issue of your treatment of Mr Jenkins, in the
 96

1 emails we've seen, you are not seemingly
 2 instructing Mr Jenkins as an expert by reminding
 3 him or drawing to his attention of any of the
 4 matters that the Criminal Procedure Rules or the
 5 common law required, correct? That's just not
 6 a feature of these email exchanges, is it?
 7 **A.** No, this is -- yeah, agreed. Yes.
 8 **Q.** Was it a significant concern to you that
 9 Mr Jenkins had not addressed the issue of
 10 whether there were any known problems in the
 11 Horizon system?
 12 **A.** Again, I don't -- I can't answer that.
 13 **Q.** Because it ought to have been, oughtn't it?
 14 **A.** Sorry, I don't know.
 15 **Q.** You've got a defence expert saying there are
 16 problems with the Horizon system, you've asked
 17 somebody with expertise within Fujitsu whether
 18 there are known problems with the Horizon system
 19 and he hasn't addressed it.
 20 **A.** I can't answer that for --
 21 **Q.** Did that position ever change?
 22 **A.** I don't know. I --
 23 **Q.** The question that Warwick Tatford had asked,
 24 whether in its original form or in its watered
 25 down form, was that ever addressed squarely and

97

1 it should be. Should be, yes.
 2 **Q.** Can we move on, please. FUJ00122731. This is
 3 still later in the day, on the 5th, 4.28 pm.
 4 You to Fujitsu again, Jones, Thomas and Jenkins:
 5 "Dear David,
 6 "Please also get Gareth Jenkins to comment
 7 on the enclosed report."
 8 That's the third McLachlan report, with
 9 a deadline of Monday, 8 February. So I think
 10 you're sending this at 4.30 on a Friday, by the
 11 look of it.
 12 **A.** I have no idea as to what day it was.
 13 **Q.** Well, if Monday was the 8th --
 14 **A.** Well, I -- probably --
 15 **Q.** The 5th would have been the Friday, wouldn't it?
 16 Yes?
 17 **A.** I don't know but if you say so. I agree with
 18 you.
 19 **Q.** Let's work out.
 20 **A.** No, no, you don't have to work it out. If you
 21 say so, it must be --
 22 **Q.** I don't want to get to the stage in asking you
 23 questions of how a calendar works, Mr Singh.
 24 **A.** No, if --
 25 **Q.** You oughtn't to be so suspicious of me that if

99

1 head on by either Fujitsu or Mr Jenkins?
 2 **A.** I can't recall. I can't give you yes or no
 3 answer to that.
 4 **Q.** Did you press that point, "We need an answer,
 5 Fujitsu, to this fundamental question"?
 6 **A.** I don't know. I mean, I haven't read the
 7 papers -- I mean the only thing is that what you
 8 supplied me in the -- you know, the Inquiry
 9 papers. I -- years on, I can't ask -- you know,
 10 I can't answer that in detail.
 11 **Q.** Would you have realised that, if Fujitsu
 12 revealed known problems with the Horizon system,
 13 that would be significant information, not only
 14 for this prosecution but for a number of
 15 prosecutions?
 16 **A.** Of course it would be.
 17 **Q.** It could bring an end to prosecutions?
 18 **A.** Yes, it -- well, if there is problems and
 19 an error, it should bring an end to
 20 prosecutions. We shouldn't proceed with it.
 21 **Q.** So it's a point that needs to be pressed hard,
 22 isn't it?
 23 **A.** But I -- as I say, I'm not the only lawyer
 24 dealing with these cases. Certainly, you know,
 25 if I'm aware of something like that, then, yes,

98

1 I tell you that Friday was the 5th --
 2 **A.** No, I'm not suspicious, I'm just saying -- well,
 3 years on. I can't tell you the reason why but,
 4 certainly, I'm trying to get the --
 5 **Q.** Do you agree that Friday was the 5th?
 6 **A.** Yeah, yes I agree.
 7 **Q.** Excellent.
 8 **A.** Fine.
 9 **Q.** So Saturday would be the 6th, wouldn't it?
 10 **A.** Must be.
 11 **Q.** Sunday would have been the 7th?
 12 **A.** Yes, agreed.
 13 **Q.** Good.
 14 **A.** Presuming Monday was --
 15 **Q.** You were sending a request at 4.28 on a Friday
 16 to Mr Jenkins, saying there's a court deadline
 17 for you to respond to this by 4.00 pm on the
 18 Monday, weren't you?
 19 **A.** Well, that's what the court deadline -- I'm
 20 stating a fact. I can only deal with what
 21 I have -- and I'm certainly -- my habit is that
 22 whatever matters in front of you, you deal with
 23 it as much as you can, I mean, instead of going
 24 backwards and forwards. You know the -- it's --
 25 a Friday, but, you know, whatever it is, I'm

100

1 highlighting what we need to do, but --

2 **Q.** Again --

3 **A.** -- whether is able to do it or not is another

4 thing and then, presumably, we'd have to go back

5 to the court and say, "Look, we couldn't do it,

6 we done all we can, please help".

7 **Q.** Again, this doesn't incorporate even the most

8 basic elements of an expert instruction, does

9 it?

10 **A.** I don't know what more do you want me to say.

11 Obviously, it doesn't --

12 **Q.** An answer to the question.

13 **A.** No, it doesn't.

14 **Q.** Thank you. Can we move on, please, to

15 FUJ00122735. If we look at 4.57 on the Friday,

16 Mr Jones says, "Please see attached", and that's

17 Mr Jenkins' comments on the third interim

18 technical report:

19 "... and Gareth's comments on the need for

20 an examination of the underlying log files and

21 timing on this."

22 If we scroll down and see what Mr Jenkins

23 said. He said:

24 "David,

25 "I've provided in line comments to the

101

1 within the contractual commercial relationship

2 in the Post Office. I think some of the emails

3 I think we looked at yesterday, that's been

4 dealt with in the background which I'm not

5 copied into, and I think Mr Jones, in turn, is

6 dealing with somebody else within the Post

7 Office, with regards to that, and --

8 **Q.** So this is 4.57 on a Friday with a court

9 deadline of 4.00 on a Monday, with the Fujitsu

10 employee saying "I can't answer these questions

11 without sight of the underlying transaction

12 data".

13 **A.** Yes.

14 **Q.** Yes?

15 **A.** Yes.

16 **Q.** Let's go back in history, please. POL00052202.

17 If we scroll down, please, thank you, an email

18 from Mr Longman to you, of six months earlier:

19 "At the hearing on 14 July, the defence

20 indicated they would be seeking the services of

21 a forensic accountant to analyse the Horizon

22 data as Ms Misra is now challenging the accuracy

23 of Horizon. I have tried to obtain the data for

24 the time Ms Misra was subpostmaster (3 years)

25 but as you can see from the email from Dave

103

1 document as revisions. I'm happy for this to be

2 passed on to [Post Office Limited] if you feel

3 it's appropriate.

4 "The simple answer is that without

5 retrieving the logs, everyone is speculating and

6 as discussed this morning, nobody has bothered

7 to ask us for any logs. At this stage it is not

8 at all clear what transactions are thought to be

9 missing, at what time, or even in what time

10 period. Analysing logs over a long period [and

11 I think this over two or three months] is very,

12 very time consuming. This is not going to

13 happen by Monday."

14 Then he because for a copy of Mr Dunks'

15 witness statement.

16 So Mr Jenkins is pointing out to Fujitsu

17 and, in turn, you that, in order to respond to

18 Professor McLachlan's interim report, the Post

19 Office needed to obtain the underlying data,

20 yes?

21 **A.** Sorry, yes.

22 **Q.** Do you know why the underlying data had not been

23 obtained?

24 **A.** Well, I -- certainly it's been requested. As

25 I said, there is a process in the procedure

102

1 Posnett there are number of issues.

2 "Please could you advise counsel of these

3 issues and inform me as to what action to take

4 ... "

5 We can look at the Dave Posnett email, if

6 you want, but ...

7 So this six months earlier, Mr Longman

8 raising with you obtaining access to the

9 underlying Horizon data?

10 **A.** Yes.

11 **Q.** Why hadn't it been sorted out in the six months

12 that had elapsed?

13 **A.** Well, it's gone off of my desk and landed on

14 somebody else who can deal with it. It's not

15 a lack of trying; it's the contractual

16 commercial relationship, and also the

17 authorisation and also as to obtaining of it.

18 I mean, it's not a -- it's not something -- this

19 is the -- this is something within my remit.

20 If I -- like I said, to you yesterday, if it

21 was up to me, then certainly I'm not concerned

22 with the -- you know, the cost of it, because

23 I'm as a prosecutor, and then a duty and

24 obligation to provide it and the simple answer

25 would have been to say "Look, you can't provide

104

1 it and, you know, offer no evidence".

2 That's probably where it's -- would come to,

3 and I think, as you can see David Posnett's

4 letter -- concern, he's in a position whereby

5 he's concerned with one expect. You've got

6 somebody else, the lawyers in the commercial and

7 contract team, dealing with something else, and

8 then you've got somebody else who's in

9 a position or role of requesting it.

10 So I'm not sure, you know, what are you

11 asking me to do.

12 **Q.** I'm asking you why you sent a request on at 4.30

13 on a Friday --

14 **A.** To?

15 **Q.** -- to Mr Jenkins, essentially, asking him to

16 opine on Professor McLachlan's third expert

17 report, and he says, "I need the underlying

18 data".

19 **A.** Yeah.

20 **Q.** It was known for six months that the underlying

21 data was something that was necessary to obtain.

22 I'm asking, well, what had happened in the six

23 months?

24 **A.** I --

25 **Q.** It had been passed around people's desks, is

105

1 is about, Mr Singh?

2 **A.** Yes, yes.

3 **Q.** Whether there were any known issues or problems

4 with the Horizon system of which Fujitsu is

5 aware. He says:

6 "He [Mr Jenkins] is not currently in

7 a position to make a clear statement. It is

8 possible for there to be problems where

9 transactions have been 'lost' in particular

10 circumstances due to locking issues. When this

11 happens then we have events in the underlying

12 eventing logs to indicate there was an issue.

13 Whenever we provide transaction logs to [the

14 Post Office Limited] we check for such events.

15 In the case of West Byfleet we have not been

16 asked to provide any transaction logs and so

17 have not made these checks."

18 **A.** Yes.

19 **Q.** Presumably you regarded that as a huge red flag?

20 **A.** Well, obviously, yeah -- as I said to you

21 earlier, I explained to you what the situation

22 was. There were problems in the background,

23 which I wasn't aware of.

24 **Q.** You're being made aware here --

25 **A.** Yeah, by --

107

1 that the answer?

2 **A.** No, the answer is it's going through -- the Post

3 Office -- you know, I can honestly say it works

4 very slowly. But it's not like a commercial

5 organisation where I've been concerned with in

6 private practice. It's completely different way

7 of dealing with it. I mean, certainly here,

8 it's -- there's processes, systems, contracts,

9 commercial relationships. As a prosecutor, as

10 a lawyer, you're basically in other people's

11 hands.

12 **Q.** Okay, anyway --

13 **A.** So I'm --

14 **Q.** -- let's go back to 5 February 2010, then, six

15 months on. FUJ00152930, email at 5.10 on the

16 Friday, David Jones to you:

17 "Jarnail

18 "This is an email that I received earlier

19 from Gareth. You will see that he is clear that

20 in order to answer counsel's questions about any

21 issues he needs to be able to check the

22 underlying transaction logs to be able to say

23 whether there were any issues. On the specific

24 issues you raise Gareth's view is ..."

25 Then number 3 -- you remember what number 3

106

1 **Q.** -- by Fujitsu.

2 **A.** -- David Jones, yes.

3 **Q.** That they cannot say -- they're not in

4 a position to provide a clear statement as to

5 whether there were problems with Horizon or not.

6 **A.** Yes.

7 **Q.** As a prosecutor, does it get any more

8 significant than that?

9 **A.** Well, no, but I mean, as I say --

10 **Q.** What do you do?

11 **A.** I don't know. I mean, I -- I haven't got the

12 paperwork. I can only go by years on and with

13 what you've provided me with. I mean,

14 I don't -- I can't see what I -- this is, again,

15 5 February. There's been lots of information

16 going backwards and forwards trying to deal with

17 it, so I can't answer that, as to -- well,

18 obviously, you know, it's important, and I think

19 we have emphasised it, and then, I think,

20 subsequently finally we do get them, don't we,

21 in March?

22 **Q.** I mean, presumably, at the very least, this kind

23 of communication is something that you would

24 want to ensure goes on a disclosure schedule,

25 just at the very least?

108

1 A. Is it not on the final disclosures? Not on the
 2 one on --
 3 Q. So far as we can see --
 4 A. 7 --
 5 Q. -- this information was not disclosed.
 6 A. -- September '10?
 7 Q. Correct.
 8 A. That's the final one. That's not on there. Do
 9 you know who actually signed that off?
 10 Q. I can check over lunch.
 11 A. Okay, please do.
 12 Q. But -- thank you very much -- at the very least
 13 you would want to ensure that this would go on
 14 a disclosure schedule, wouldn't you?
 15 A. Yes, essential. Yes, agreed.
 16 Q. Did you say "essential"?
 17 A. Of course -- you know, yes.
 18 Q. The operators of the system are saying they
 19 can't make a statement --
 20 A. Because --
 21 Q. -- a clear statement that there are no problems
 22 with Horizon --
 23 A. Yes.
 24 Q. -- or known issues with Horizon?
 25 A. Obviously there's confusion, there's mistakes,

109

1 MR BEER: Yes, there's lots of nodding.
 2 SIR WYN WILLIAMS: Good. All right.
 3 So we'll break off until 1.50 and then we'll
 4 go until 3.00, or obviously a minute or two
 5 beyond, if you want to complete some particular
 6 line of questioning, and then we will resume in
 7 the New Year.
 8 MR BEER: Thank you very much, sir.
 9 (12.50 pm)
 10 (The Short Adjournment)
 11 (1.50 pm)
 12 MR BEER: Good afternoon, sir, can you see and hear
 13 me?
 14 SIR WYN WILLIAMS: Yes, thank you.
 15 MR BEER: Thank you.
 16 Good afternoon, Mr Singh.
 17 Can we turn to an issue that you raised
 18 before lunch, namely what was on the Schedule of
 19 Non-Sensitive Unused Material on 8 September
 20 2010 -- you called it the September 2010
 21 schedule -- and who signed it, and just close
 22 that issue off, if we may, by looking at
 23 POL00055217.
 24 Can you see this is a Schedule of
 25 Non-Sensitive Unused Material in the case of

111

1 there's errors, all sorts of things on here but
 2 it's a big organisation. How do you control it?
 3 MR BEER: Sir, I wonder whether we could stop there,
 4 please, and come back at 1.50.
 5 We're finishing at 3.00 pm today, so I think
 6 we can do one session after lunch from 1.50
 7 until 3.00.
 8 I've informed the Core Participants who had
 9 submitted questions that the progress that I've
 10 made isn't as swift as I'd intended, for one
 11 reason or another and, therefore, I would
 12 propose that I continue asking questions until
 13 3.00 pm, that they defer any questions that they
 14 wish to ask of Mr Singh until when he returns on
 15 the next occasion next year.
 16 Everyone, I think, has been agreeable to
 17 that.
 18 SIR WYN WILLIAMS: Any questions that you may still
 19 have will also be dealt with next year; is that
 20 right, Mr Beer?
 21 MR BEER: Yes, exactly. I'm afraid it's taken me
 22 longer than I'd hoped.
 23 SIR WYN WILLIAMS: No, no, I follow. Could I just
 24 have confirmation from all the Core Participants
 25 that they're content with that?

110

1 Seema Misra?
 2 A. Yes.
 3 Q. Would this be completed, ie the typing on it, in
 4 column 1, 2 and 3, by the Disclosure Officer?
 5 A. Yes.
 6 Q. Would be comment column in column 4 be completed
 7 by the reviewing lawyer --
 8 A. Should be, yes.
 9 Q. -- in Legal Services?
 10 A. Yes.
 11 Q. If we look at this schedule, if we scroll down
 12 to the foot, we can see it's dated 8 September
 13 2010 --
 14 A. Yes.
 15 Q. -- ie the one that you were referring to, and
 16 you asked whether the email exchanges that I was
 17 asking you about were on the Schedule of Unused
 18 Material, and I said "No, they're not".
 19 So if we just look at the schedule to start
 20 with. If we scroll up, please. If you just
 21 scroll through all of those items, we can
 22 probably do this quite quickly.
 23 Then scroll down. Then over the page.
 24 Scroll down.
 25 You can see that no emails are referred to.

112

- 1 A. No.
- 2 Q. So not just the ones I was speaking about at the
3 time but no emails concerning liaison with
4 Fujitsu or Gareth Jenkins over the commissioning
5 or contents or parameters of his witness
6 evidence are included, are they?
- 7 A. No.
- 8 Q. If we go back to page 1, please. Whilst we're
9 here -- we'll come back to it later -- but this
10 Schedule of Unused Material does not contain any
11 drafts of any of his witness statements, does
12 it?
- 13 A. No, it doesn't, no.
- 14 Q. Did you know, in 2010, that there was
15 an obligation under the law that had existed
16 under the Code of Practice promulgated under the
17 CPIA 1996 to disclose, as unused material,
18 drafts of witness statements, where they were
19 materially different from the served version?
- 20 A. I can't remember now, to be honest, but I would
21 assume -- I've been on the courses, I would have
22 been aware. But I can't -- I don't -- I can't
23 recall it.
- 24 Q. Assuming that you were aware of that --
- 25 A. I should have been, yes.

113

- 1 lawyer?
- 2 A. Yes.
- 3 Q. What function did the reviewing lawyer perform
4 in relation to the schedule of non-sensitive
5 material?
- 6 A. Well, he needed to -- well, certainly review
7 all, every single information he has or he
8 should have or, if he hasn't, to get the
9 Investigation Officer to get it over to him, or
10 put it in the schedule for him, or -- and then,
11 having reviewed it, finally conclude that it's
12 on here.
- 13 Q. Would the reviewing lawyer sign it?
- 14 A. If he's happy with it, he would only sign it if
15 he's happy it's all complete, yes.
- 16 Q. You'll see the way this form is designed, that
17 there isn't an obvious place for the reviewing
18 lawyer to sign. The signature that's underneath
19 "GRO" there is Mr Longman's signature?
- 20 A. Oh. Oh, is it? I don't know. I mean,
21 I presume there's a reviewing lawyer, who need
22 to -- I don't know whether I dealt with it,
23 whether I signed it next to where this reviewing
24 lawyer is.
- 25 Q. That's what was supposed to happen, was it --

115

- 1 Q. -- we're going to see, later this afternoon,
2 that there were a series of draft statements
3 that pass through your hands, which were very
4 materially different from initial drafts and, in
5 particular, they contain drafting suggestions
6 made by Warwick Tatford --
- 7 A. Yes, Mr Tatford, yes.
- 8 Q. -- and none of those were disclosed. How did
9 that come about?
- 10 A. Who signed this? Have I?
- 11 Q. You can see at the foot of it, it is signed by
12 Mr Longman?
- 13 A. No, but the reviewing lawyer, is it me? Because
14 I know there was number of people dealing with
15 it.
- 16 Q. Let's start with how it was supposed to work.
- 17 A. Yeah, please.
- 18 Q. The Disclosure Officer was responsible for
19 collecting together the material --
- 20 A. Yes.
- 21 Q. -- and deciding, in the first instance, whether
22 it required to be listed on this schedule or
23 a sensitive schedule or not at all, agreed?
- 24 A. Yes, agreed.
- 25 Q. They would submit the schedule to the reviewing

114

- 1 A. Yes.
- 2 Q. -- that it was signed next to the words
3 "Reviewing Lawyer" to show that the two-person
4 process of the Disclosure Officer, on the one
5 hand, and the independent of the Disclosure
6 Officer, the reviewing lawyer on the other, had
7 each applied their minds to the contents of the
8 schedule?
- 9 A. Yes.
- 10 Q. So would you get copies of these documents here,
11 1 to 11 --
- 12 A. Yes, yes.
- 13 Q. -- when you got this schedule?
- 14 A. Absolutely, yes.
- 15 Q. Right.
- 16 A. It should be enclosed with it.
- 17 Q. So that's what the Disclosure Officer is
18 submitting to you, a schedule, plus a copy of
19 the documents that are mentioned in the
20 schedule?
- 21 A. Yes.
- 22 Q. Yes? What about material that's not mentioned
23 in the schedule? How did the reviewing lawyer
24 go about ascertaining what steps had been made
25 to collate material, to decide whether it should

116

1 go on the schedule?

2 **A.** Well, you were meant to review the whole case
3 and presumably make a list of what should be
4 there. The matters just mentioned about the,
5 you know, the drafting of the statement or the
6 amending of it and, as you go through it,
7 presumably you make a list and I think yesterday
8 you enclosed in one of the documents as to what
9 should be on it, plus -- depending on the kind
10 of case it is and, presumably here, we're
11 requesting a lot of information from Fujitsu,
12 and it's not forthcoming, and if those matters
13 that, you know, underline the prosecution case
14 and assist the defence, that's the test.

15 And the fairness of the trial, all that
16 needs to be requested, asked for, searched for
17 and then subsequently listed before you sign it
18 off or submit it to the defence.

19 **Q.** In this case, this wasn't one of those cases
20 where the investigatory work had been carried
21 out by, and only by, the Investigator and the
22 reviewing lawyer was not cited on any of it.
23 We've seen from the email exchanges that we've
24 looked at so far that you were included in
25 a series of emails, which made it clear that you

117

1 answer or feel unable to answer, that material
2 needs to go on an unused schedule, here it is"?

3 **A.** The person who would have dealt with it would
4 have been my supervising officer --

5 **Q.** Who was that?

6 **A.** Supervising officer.

7 **Q.** Who was that?

8 **A.** You know, the Head of Criminal Law Team.

9 **Q.** Who was that?

10 **A.** Rob, I think Robert, Rob --

11 **Q.** So he took over the file whilst you were away,
12 did he?

13 **A.** I think he always kept in eye on it.

14 **Q.** No, no. You're talking about something
15 different here, Mr Singh?

16 **A.** Yes, he --

17 **Q.** You're telling us --

18 **A.** He took over for that period when I was away.

19 **Q.** When did he take over from?

20 **A.** I don't know. I think probably about end of
21 August, beginning of October.

22 **Q.** Sorry, he took over from the end of August until
23 the beginning of October?

24 **A.** Yeah, I think I was away for a long, long period
25 of about three or four months. I wasn't even in

119

1 were in possession of relevant material?

2 **A.** Yes. It's on the file. It should be on the
3 file.

4 **Q.** So why was that material not listed on the
5 schedule?

6 **A.** I honestly can't say why but I don't know --
7 when was the actual information sent, the
8 non-sensitive material in this schedule, when
9 was it sent to the defence?

10 **Q.** Sorry, when was the non-sensitive material --

11 **A.** It must have been served on the defence, if it's
12 been --

13 **Q.** I don't know. At some point, presumably after
14 8 September 2010.

15 **A.** Yeah, I know certainly this matter was dealt
16 with -- the other lawyers in the office, and
17 I think around about that September '10, I was
18 away for a long, long period. I wasn't even in
19 the country. That's the reason why. I can't
20 really --

21 **Q.** So what did you do to tell the new lawyer,
22 "Look, I've been party to dozens of emails in
23 which the third party, Fujitsu, has been asked
24 a series of questions, some of which they've
25 answered, some of which they've declined to

118

1 the country. I had some things to sort out and
2 I got the leave to go.

3 **Q.** Presumably you said, "Look, Rob, we've got all
4 of this unused material here. I've got it, it's
5 on my file, it's in my email inbox and outbox.
6 Here it is, this needs to be listed on the
7 unused".

8 This is one of the cases I think we sat
9 together, reviewed it constantly over a period
10 of time. I think he was more of less up to date
11 because it was one of those cases where I felt
12 a lot comfortable with the fact that it's been
13 looked at, reviewed by the barrister who would
14 deal with the trial, if it came to the trial,
15 and subsequently my line manager. So if there
16 was anything I overlooked, he would pick it up,
17 and vice versa.

18 And that's one of the reasons why the
19 disclosure was dealt with in the way it did, in
20 the fact that I kept the counsel, the barrister
21 in the case, up to date with everything, and all
22 seeking advice as the matter progressed because
23 there's --

24 **Q.** I'm asking you, Mr Singh, about what steps you
25 took, to ensure, in this period of absence that

120

1 you're telling us about --

2 **A.** Well, I --

3 **Q.** -- hold on --

4 **A.** Sorry, okay.

5 **Q.** -- that the material you were in possession

6 often, that undermined the prosecution case, was

7 included on a disclosure schedule. What steps

8 did you take?

9 **A.** I think, firstly, the fact that I think he

10 was -- he was my line manager and top of it,

11 that he -- we were dealing with it, you know,

12 together. And then I think before I left,

13 I think we had the case for the -- we had the

14 date for the trial, and I think -- I don't know

15 whether we sat together or he made notes or

16 I actually dictated notes. I don't know now

17 exactly how this came about.

18 **Q.** Do you accept, Mr Singh, that it's a serious

19 dereliction of the prosecution's duties --

20 **A.** Yes, of course.

21 **Q.** -- not to have included --

22 **A.** Yes.

23 **Q.** -- on this schedule or any schedule of unused

24 material the email exchanges that we were

25 looking at earlier?

121

1 **Q.** Thank you, that can come down.

2 Can we return to another issue that we

3 addressed before lunch, the extent to which you

4 treated Mr Jenkins as an expert.

5 **A.** Yes.

6 **Q.** Remember, I showed you some emails after the

7 event from, I think, 2012/2013, which referred

8 to you having instructed him as an expert. Can

9 I just look at some material that bears on that

10 issue from a different angle.

11 Can we start, please, by looking at

12 POL00045565. If we look at the second page,

13 please, it's a note from Warwick Tatford. If we

14 go back to the first page, it's an attendance

15 note for a mention on 7 May 2010.

16 **A.** Yes.

17 **Q.** Can you see that?

18 **A.** Yes.

19 **Q.** If we look at the third paragraph, please, if

20 that can be blown up, please:

21 "The Judge was prepared to break the fixture

22 because it had been fixed without the knowledge

23 of Keith Hadrill's dates to avoid [he was

24 defence counsel]. The Judge ordered that the

25 experts should compile a schedule of their

123

1 **A.** Yes, agreed.

2 **Q.** And a serious dereliction of the Prosecution's

3 duty not to include, on this schedule or any

4 schedule, the draft witness statements of

5 Mr Gareth Jenkins which were materially

6 different from the signed version?

7 **A.** Yeah, yeah.

8 **Q.** Your answer to that is essentially: "You need to

9 ask Mr Wilson about them"?

10 **A.** Yes.

11 **Q.** It's not down to you?

12 **A.** No, I accept that maybe I should have done more,

13 but, certainly, in that particular period --

14 **Q.** What do you mean you should have done more?

15 **A.** More in the sense that I should have had

16 something -- more in the sense that I don't

17 know, made everybody aware of it, maybe I should

18 have listed it, I don't know but I think I sat

19 with him, almost constantly and also I think he

20 more or less, on and off, took over the case to

21 have a look.

22 I think he was reviewing it all the time,

23 I don't know whether he made notes of it but

24 it's such a long time ago, I can't recall

25 exactly what --

122

1 points of agreement and disagreement. No

2 further directions were made", et cetera.

3 You would have known by the time of receipt

4 of this document that the court was regarding

5 Mr Jenkins as an expert, agreed?

6 **A.** Well, that's what it says, yes.

7 **Q.** No, you would have known personally that, by the

8 time of receipt of this document, 7 May 2010,

9 the court was treating Mr Jenkins as an expert,

10 agreed?

11 **A.** That's noted by our counsel. I mean, presumably

12 he was at the hearing and he --

13 **Q.** Yes, but he was giving you a note of what

14 happened at the hearing?

15 **A.** Yes, yes, he --

16 **Q.** The judge is referring to the "experts", plural,

17 compiling a point of "their points", plural, of

18 agreement and disagreement. So you would know

19 that, by this time, the court was treating

20 Mr Jenkins as an expert, agreed?

21 **A.** Agreed, yeah.

22 **Q.** So when, in your witness statement -- do you

23 remember those two paragraphs that I showed you

24 first thing -- you said "I didn't regard

25 Mr Jenkins as an expert but the court did". You

124

1 would have been referring, there, to at least
 2 this point onwards, wouldn't you: May 2010
 3 onwards? You knew the court was treating
 4 Mr Jenkins as an expert?
 5 **A.** What can I say? I certainly -- that's what the
 6 court --
 7 **Q.** Yes, so what did you do from May 2010 onwards to
 8 ensure all of the things that I mentioned this
 9 morning that a prosecutor must do in relation to
 10 an expert were done?
 11 **A.** I -- as I say, I obviously --
 12 **Q.** None of them?
 13 **A.** -- in error.
 14 **Q.** Is the answer none of them?
 15 **A.** None of them, yeah.
 16 **Q.** Why did you do none of those things?
 17 **A.** I cannot tell you. Obviously, you know, it's my
 18 fault. I take responsibility that I should have
 19 done, which I didn't, for some reason or
 20 another. I don't know. I can't explain it to
 21 you now but, certainly, we would have been aware
 22 of it because of the note, and certainly --
 23 certainly, at some stage, maybe even in the
 24 conference or beforehand, we should have done
 25 something about it in order to comply with it,

125

1 have done.
 2 **Q.** Can we move on to POL00055118. Attendance note
 3 in your hand, again, 28 July 2010:
 4 "Telephone call received from Warwick
 5 Tatford of Counsel in this case. After
 6 discussion he confirmed that they are seeking
 7 exactly what they were seeking before and to
 8 respond to the Defence that if they wish to
 9 disclose these items they need to make
 10 a Section 8 application to Court and that also
 11 our Expert, Mr Jenkins, has informed their
 12 Expert that the material from Chesterfield that
 13 is the Logs is not relevant information that
 14 would assist them."
 15 So here you've got your counsel referring to
 16 Mr Jenkins as "our", ie the Post Office's,
 17 expert, yes?
 18 **A.** Well, yes, that's what it says, yes.
 19 **Q.** What did you do at this time, July 2010, to
 20 ensure that the duties and obligations that we
 21 went through earlier were complied with?
 22 **A.** I'm sorry, it's obviously been an oversight.
 23 I mean, certainly, I was -- it's there in black
 24 and white and should have been done and wasn't
 25 done.

127

1 and we didn't.
 2 **Q.** Can we move on to POL00054763. You'll see this
 3 your own attendance note.
 4 **A.** 18 May?
 5 **Q.** Yes, so 11 days later. You say:
 6 "The Defence had the case listed for mention
 7 at Guildford Crown Court on 7 May as they were
 8 unable to serve the full Defence Expert's Report
 9 by the 28th as directed by the court.
 10 "At the mention hearing at Guildford on
 11 7 May, the matter was heard by the Resident
 12 Judge [I think that's meant to be Critchlow] who
 13 ordered the defence to serve a full and proper
 14 Defence Expert's Report on the prosecution and
 15 then the two experts to meet to agree a point of
 16 agreement ... listed the trial for 11 October."
 17 So this is in your own hand, a note for the
 18 file, where you are recording Mr Jenkins as
 19 being one of two experts, aren't you?
 20 **A.** Yeah. Well, clearly.
 21 **Q.** Again, at this time, what did you do to ensure
 22 that all of the duties and obligations that you
 23 owed as a prosecutor were complied with at this
 24 time?
 25 **A.** I -- in error or oversight, I didn't. I should

126

1 **Q.** Can we move to POL00001882, please, and scroll
 2 down, thank you. This a joint statement of
 3 areas of agreement and disagreement prepared by
 4 Gareth Jenkins and Professor McLachlan; can you
 5 see that?
 6 *(No audible answer)*
 7 If we go over the page, please, and go to
 8 the last page, and just scroll down, thank you.
 9 You can see it's dated 11 October 2010, so just
 10 shortly before trial.
 11 If we go back to page 2:
 12 "This document comprises a schedule of
 13 agreement", et cetera, et cetera.
 14 **A.** Yes.
 15 **Q.** So this is, would you agree, the kind of
 16 schedule of agreement and disagreement that one
 17 commonly sees in cases involving expert
 18 witnesses?
 19 **A.** Well, as I said, this is the first experience of
 20 any of this nature, yes. Agree.
 21 **Q.** When you saw this, did you think "Well, hold on
 22 a moment, Mr Jenkins isn't an expert, he's a lay
 23 witness of fact. What's he doing signing off
 24 an expert schedule of agreement and
 25 disagreement?"

128

1 A. I don't -- I can't recall what I was thinking at
 2 the time, certainly all that was referred to the
 3 counsel and also my line manager. I don't know,
 4 nobody is -- it's down to me, I agree, I should
 5 have picked it up and done something about it.
 6 Q. Do you agree that that's a serious dereliction
 7 of your duties as a prosecutor?
 8 A. Yes, yes it is.
 9 Q. Thank you very much, that can come down.
 10 Picking up where we left off before lunch,
 11 we were looking at the email that Mr Jones, the
 12 Head of Legal at Fujitsu, had sent you on
 13 5 February 2010. Perhaps if we just remind
 14 ourselves of that, FUJ00152930. Do you remember
 15 we were looking at this before lunch, and it's
 16 this critical issue of what started as
 17 paragraph 7 of Mr Tatford's advice about getting
 18 out of Fujitsu known or recognised errors or
 19 issues within the Horizon system; the watering
 20 down, as I've called it, of that request; the
 21 putting of that to Fujitsu and Mr Jenkins; and
 22 the reply coming back, "He's not currently in
 23 a position to make a clear statement".
 24 A. Yes.
 25 Q. Can we just look at the draft witness statement
 129

1 there were any known problems with Horizon?
 2 A. I don't -- I -- I don't -- I don't know.
 3 I can't think now as to what -- what I was
 4 thinking at that time or what we did about to
 5 deal with it.
 6 Q. What about what is said there: "It is possible
 7 for there to be problems where transactions have
 8 been lost in particular circumstances due to
 9 locking issues"? What further information did
 10 you seek from Mr Jones, or Fujitsu more
 11 generally, as to what this problem was and what
 12 the background to it was?
 13 A. I honestly don't know. I mean, I don't know
 14 what it was because I haven't got the whole
 15 file. And, certainly, you know, I was working
 16 with other people, I would have sought advice as
 17 to what directions we take from there.
 18 Certainly, you know, the barrister, working
 19 alongside of me, together with the head of the
 20 Criminal Law Team.
 21 I mean, I -- as I say, this is the first
 22 case of this nature, that's why I wouldn't have
 23 done these -- taken that case on by myself,
 24 I would have had other people working alongside
 25 with me. And it was that period, I think in
 131

1 that was attached to the emails, by looking at
 2 FUJ00122723. If we look at page 2, please, can
 3 you see that Mr Jenkins internally says, ie to
 4 Mr Jones and Ms Thomas:
 5 "Brief responses as follows, but not sure
 6 that I should put them in a Witness Statement."
 7 Then number 3:
 8 "This is where I'm reluctant to make a clear
 9 statement. I am aware of one problem where
 10 transactions have been lost in particular
 11 circumstances, due to locking issues",
 12 et cetera, et cetera, which was cut into the
 13 email that you yourself received.
 14 Then if we scroll up, please, and a little
 15 further. You can see that is indeed forwarded
 16 on to you; can you see that?
 17 A. Yes.
 18 Q. What did you think when you read that Mr Jenkins
 19 said he was reluctant to make a clear statement
 20 over whether there were known issues or problems
 21 with the Horizon system?
 22 A. Sorry, say that again? Sorry.
 23 Q. What did you think when you received
 24 a communication which said that Mr Jenkins was
 25 reluctant to make a clear statement over whether
 130

1 that year, where I think I took time off,
 2 certainly, and we had our Head of Criminal Law
 3 Team working alongside me who was caretaking
 4 while I was away.
 5 Q. Did you take any steps to understand what the
 6 issue was with Horizon, which could cause
 7 transactions to be lost?
 8 A. I don't recall. From what you -- this is the
 9 only thing or whatever you've given in your --
 10 you know, the papers you've submitted to me,
 11 apart from that, I can't really add any more.
 12 Q. Given that your counsel, Warwick Tatford, had
 13 originally advised the Post Office in relation
 14 to its disclosure obligations to ask Fujitsu
 15 whether it was aware of any other Horizon errors
 16 that had been found at any sub post office, and
 17 this information was conveyed in response, did
 18 you take any steps to ensure that the Post
 19 Office met its disclosure obligations in
 20 relation to at least this information?
 21 A. I don't recall. I mean, I don't -- I can't --
 22 I don't know, I haven't got the full information
 23 in front of me as to what steps we took.
 24 Q. We've seen on the disclosure schedule that there
 25 is no mention of any document exchanged with
 132

1 Fujitsu, nor any email exchanged with Fujitsu.
 2 There's no disclosure on the unused schedule of
 3 any communications with that third party
 4 provider, is there?

5 **A.** Not on that schedule. Should be. Should have
 6 been.

7 **Q.** So this is 5 February. Can we look, please, at
 8 POL00054162, your email of 22 February to
 9 Warwick Tatford and Jon Longman, and you say:
 10 "Herewith my replies to the Defence's third
 11 [schedule]. I would be grateful to Jon if he
 12 could read through all the replies but in
 13 particular ... detailed responses to [a list of
 14 them].

15 "... responses by end of business today so
 16 [you] can forward on to the Defence Solicitors."

17 Then at (2) you proposed to say to
 18 Issy Hogg:

19 "We are well aware of our statutory duty of
 20 disclosure. As you know, the prosecution have
 21 reviewed a large volume of material. The only
 22 material disclosable is Callendar Place [I think
 23 you meant Callendar Square]. As we know
 24 Mr Jenkins is making full investigations so the
 25 position can be ascertained."

133

1 information, isn't solely down to me because
 2 it's sort of done by the whole team, because of
 3 the nature of the case and because of this being
 4 the first of Post Office cases where the matter
 5 has gone --

6 **SIR WYN WILLIAMS:** All right. Hang on, Mr Singh.

7 In the circumstances that are developing,
 8 Mr Beer, can you think of any cogent reason why
 9 I should refuse Mr Singh's request?

10 **MR BEER:** Sir, I think there needs to be
 11 a limitation placed upon it because the --

12 **SIR WYN WILLIAMS:** I think the limitation, in
 13 reality, will be that I will limit it to five
 14 minutes, Mr Beer.

15 **MR BEER:** Yes, because the -- I wasn't thinking in
 16 terms of time; I was thinking in terms of
 17 content.

18 **SIR WYN WILLIAMS:** I know. I was simply observing
 19 that, if I limited it in time, the content is
 20 likely to be limited as well. But maybe that's
 21 too pragmatic.

22 Anyway, all right, is anyone else
 23 representing a Core Participant? Does he or she
 24 wish to provide a cogent reason why I shouldn't
 25 accede to this request?

135

1 The information that you received from
 2 Mr Jenkins via Mr Jones and Fujitsu was not
 3 disclosed by you in this proposed communication
 4 to the defence solicitors, was it?

5 **A.** I don't recall.

6 **Q.** Well, it's not there, is it?

7 **A.** Can I just stop for five minutes and have a chat
 8 with my solicitor on this, if it's possible,
 9 sir?

10 **SIR WYN WILLIAMS:** Well, that's a rather unorthodox
 11 request, in the sense that witnesses don't
 12 normally have a chat with their solicitor --

13 **A.** Well, advice, then, because --

14 **SIR WYN WILLIAMS:** If it relates to the warning
 15 I gave you at the beginning of your evidence
 16 about self-incrimination, then I will permit it.
 17 Does it relate to that?

18 **A.** Well, sir, to a degree, because this information
 19 is very old and I -- you know, you're
 20 12/13 years on. I have not seen the file. I've
 21 been away from this type of case. Even the --
 22 my honest belief as to the previous questions
 23 asked of me by your Inquiry counsel, as to
 24 whether that -- as to whether Mr Jenkins was
 25 expert or not expert, again, there's a lot of

134

1 **MR BEER:** No, I'm getting shakes of heads from Post
 2 Office, Howe+Co, Hudgells, Fujitsu and Gareth
 3 Jenkins' representatives.

4 **SIR WYN WILLIAMS:** Right.

5 **MR BEER:** It is just HJA, I think, are thinking
 6 about it.

7 **SIR WYN WILLIAMS:** Mr Singh, I'm going to afford you
 8 five minutes, literally. I'm going to specify,
 9 since it arose in relation to this document,
 10 that the discussion must relate only to the
 11 document which is now on the screen and, in
 12 particular, the highlighted part at paragraph 2,
 13 and anything which bears upon that in relation
 14 to self-incrimination. All right?

15 So with those words, what's the time now,
 16 Mr Beer?

17 **MR BEER:** It's just gone 2.25. Shall we say 2.35,
 18 sir?

19 **SIR WYN WILLIAMS:** Yes, 2.35 we will return, all
 20 right. So you need to get your skates on,
 21 Mr Singh. All right.

22 **THE WITNESS:** No problem.

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

24 (2.26 pm)

25 (A short break)

136

1 (2.35 pm)

2 **MR BEER:** Sir, can you see and hear us?

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

4 **MR BEER:** Mr Singh, is there anything you wanted to
5 convey to the Chairman, having had --

6 **A.** No, sir, thank you, sir. Thank you for the
7 time. It was just to clarify my head. I think
8 I needed the time.

9 That's fine, that's okay. Can you ask the
10 question again, and I can --

11 **Q.** Thank you. This draft communication to the
12 defence solicitor, Issy Hogg, was to tell her
13 that you, the prosecution were:

14 "... well aware of our statutory duty of
15 disclosure. As you know, the prosecution has
16 reviewed a large volume of material. The only
17 material disclosable is Callendar Place ..."

18 My question was: why did you not reveal the
19 information that Mr Jenkins had provided you
20 through Fujitsu about a known problem which
21 caused transactions to disappear or to be lost?

22 **A.** This to Mr Warwick Tatford and Longman, isn't
23 it?

24 **Q.** Yes, it's a draft email.

25 **A.** Draft email. I'm working alongside the counsel

137

1 defence?

2 **A.** I don't know. I don't -- I don't recall as to
3 where we are at that particular moment in time.
4 I think it's 24 February '10, so I don't recall.
5 I can't assist any more than that.

6 **Q.** Let's move on. FUJ00122808. Mr Jenkins on
7 8 February is emailing you directly, copying in
8 Penny Thomas and David Jones, and he says:

9 "Attached is a new witness statement saying
10 what I don't know about Falkirk [that's
11 Callendar Square] and also comments on the third
12 report."

13 Can we look, please, at the draft statement
14 POL00001569. Can you see Mr Jenkins' draft
15 statement here, attached to that email to you?

16 **A.** Yes.

17 **Q.** He says, if we just scroll down a little bit:

18 "I have been asked if issues found at
19 Callendar Square Post Office in Falkirk could
20 have caused the discrepancies in Seema Misra's
21 case. At this stage, I am not aware of the
22 details of the problems in Callendar Square Post
23 Office in Falkirk. However I expect to be able
24 to find out the details of that case and also to
25 compare the failing scenarios with the detailed

139

1 but I don't recall or remember this. I can't

2 answer. I don't know the -- I don't recall.

3 **Q.** Do you agree that the information that you had
4 received should have been revealed to the
5 defence? I think you've agreed that already, in
6 fact, before the break. But do you agree that
7 it should have been revealed in this response to
8 the defence?

9 **A.** Again, it's such a long time ago. I am trying
10 to -- a lot of it is basically since I've left
11 doing this sort of work, it's just -- it's
12 unmanageable, the amount of material that I had.
13 Certainly, I do not remember, I do not recall.
14 I can't really assist the Inquiry any more than
15 that because it's not something that I would
16 have retained to give you an answer for. So
17 I don't remember, I don't recall.

18 **Q.** Can we look, please, at POL00054185.

19 Can we see the email that, in fact, went out
20 from you to Issy Hogg, and can you see numbered
21 paragraph 2 of it is in exactly the same terms?

22 **A.** Yes.

23 **Q.** You'd been told by this stage that there was
24 a known problem with Horizon causing
25 transactions to be lost. Why not tell the

138

1 logs that are to be extracted for the Seema
2 Misra case and should then be able to make it
3 clear if the scenario is relevant."

4 So the witness from Fujitsu is saying,
5 "I don't actually know about the one problem
6 with Horizon that has been disclosed to the
7 defence", isn't he, "but I'm going to try and
8 find out"?

9 **A.** I don't -- the -- I think -- I can't really
10 recall. I cannot really say. It's just too
11 minute details in this moment in time. I don't
12 know what I was thinking at that particular
13 moment. I don't recall most of what you asked
14 me this afternoon, purely because I have been
15 given a lot of information, and I'm not at
16 a time and place and age to be able to digest
17 all that and say to you one way or the other.

18 I mean -- so I don't know, I don't recall
19 and I don't remember. So that's all I can
20 assist you with. I don't remember any of that
21 as to how we dealt with it or why we dealt with
22 it. It's just I don't recall, and I think, at
23 the end of today, what I've done is I've had
24 a second set of eyes looking at it all the time,
25 or even third set of eyes. You've got the Head

140

1 of Criminal Law Team and you've got the
2 barrister looking at it, purely because it's
3 something we have never experienced before and
4 it's the first time, I think, the Post Office
5 have gone through this sort of process and
6 system. So that is one of the reasons why I'm
7 copying everything to the counsel, who is well
8 experienced and knowledgeable, together with the
9 Head of Criminal Law Team who had, I think been
10 in practice since 1980. So I am --

11 **Q.** You sent this to the Head of Criminal Law, did
12 you?

13 **A.** He was part and parcel of the -- working
14 alongside me. I mean, it's not something that
15 I'd done alone.

16 **Q.** Have you decided, since the break, to come back
17 and say, "I don't recall, I don't remember".

18 **A.** No, absolutely not. I mean it's something, you
19 know, 10, 12 years ago, I've not been in
20 practice. I've been doing other things. I've,
21 you know -- you work hard early on to be able to
22 enjoy life at certain stage, and I have been.
23 And I -- it's not not wanting to assist the
24 Inquiry; I think that's never been my intention,
25 and I have been very clear.

141

1 subsequently, we will see, that she dealt with
2 various aspect of it because the fact that she
3 was senior, she would take up various matters
4 alongside it, which I was agreed --

5 **Q.** We'll maybe get to that email that you do
6 remember a little later.

7 **A.** Yeah, sorry. But you can rest assured it was
8 not a sole -- it was a team effort in effect
9 because I wasn't comfortable dealing with it
10 alone because, you know, it's like requesting
11 information, time to understand it. That's one
12 of the reasons why the barrister, I think you
13 will -- he's always been copied in, purely
14 because you had to have his advice --

15 **Q.** I haven't challenged you on that at all.

16 I haven't challenged you that many of these
17 things were run past Warwick Tatford. What
18 you've just told us, that this was a team
19 effort, by that do you mean: decisions not to
20 disclose what Gareth Jenkins had informed you,
21 there was a collective decision not to disclose
22 it?

23 **A.** No, not at all. What I mean is that -- it's not
24 a collective decision not to disclose it. For
25 some reason or other, I do not recall what we

143

1 I think maybe on the first day I was
2 a little bit nervous because -- I was nervous in
3 the sense that I've been out of practice but
4 I think slowly, slowly, I've been able to slow
5 down, understand what you are asking, and
6 I've -- in those circumstances, I'm trying to
7 assist. I do not recall this, and I would not
8 recall to it this much detail at this stage in
9 my life and in my career. Because I'm not
10 a prosecutor, any more, and I have not been for
11 the last, you know, 12 years or so.

12 And I can rest assure this has been done
13 with a barrister on one side and the Head of
14 Criminal Law on the other, plus a principal
15 lawyer, and I think --

16 **Q.** Who was the principal lawyer who was also --

17 **A.** Juliet McFarlane.

18 **Q.** She was being copied in on all these emails too,
19 was she?

20 **A.** She had the files on and off.

21 **Q.** What do you mean she had the files?

22 **A.** Well, the files was, well, basically shared in
23 that respect.

24 **Q.** How were they shared?

25 **A.** Well, the shared -- I think there's an email

142

1 did or what we didn't do, but that is the
2 position. I can't, 12 years on, assist you,
3 purely because I don't recall. I don't
4 remember.

5 **Q.** Can we move on, please, to POL00054056, the same
6 day now at 3.09. You send Mr Jenkins' witness
7 statement of 2 February and his witness
8 statement of 8 February to Warwick Tatford and
9 the Investigator, Jon Longman. Can you see?

10 **A.** Yes.

11 **Q.** You say that you've served them on the defence,
12 yes?

13 **A.** Yes.

14 **Q.** So, at this point in time, 3.00-ish on
15 8 February, would you agree that the only
16 instructions that the Post Office had given to
17 Mr Jenkins were those that were set out in the
18 email from Jon Longman that we saw earlier,
19 "Please comment on the witness statement or the
20 expert report of Professor McLachlan, versions 2
21 and 3", and asking him to address his written
22 points 1 to 4. That's the only form of
23 instruction that Mr Jenkins got, agreed?

24 **A.** I don't -- I don't recall. I mean, I don't
25 know. I mean, I -- unless I revisit the whole

144

1 paperwork from the beginning to the end, and we
2 put the clock back, you know, to the year 2010,
3 I can't really assist you one way or the other
4 what we did or didn't do.

5 **Q.** On the documents we've seen, the only form of
6 instructions that Mr Jenkins got were requests
7 to comment on Professor McLachlan's reports 2
8 and 3 and to address the four issues mentioned
9 in the Jon Longman email?

10 **A.** Well, that's what we're trying to correlate is
11 to get the two gentlemen together to work out
12 where we go from here. I mean, certainly,
13 there's no intention on any of it, that's the
14 practical approach to it, and, as far as to
15 where we are, at that particular moment in time
16 now, I can't -- I don't -- I don't recall it and
17 I don't remember anything. So I don't recall on
18 that. I can't assist you any further.

19 **Q.** Would you at least agree that neither of the
20 witness statements that Mr Jenkins had provided
21 at this time in draft incorporated the necessary
22 elements of an expert report?

23 **A.** I -- which -- well, as I said to you, my -- it's
24 obviously been overlooked. You showed me the,
25 you know, the court's decision and my own

145

1 involved in it, that we should have done what
2 was required of us.

3 So it's not anything more than that but he
4 was brought in purely because he was
5 a specialist looking at special system which he
6 was the best person to assist the court, the
7 prosecution and the defence.

8 **Q.** That can come down. Thank you.

9 Can we move on to the 9 February,
10 POL00054085. If we scroll down, please --
11 sorry, over the page. Sorry, scroll up a little
12 bit, please. I think that must be an errant
13 reference. I'll move on.

14 FUJ00152979, please, 22 February. You're
15 writing directly to Mr, Jenkins, saying:

16 "Thank you for providing the two witness
17 statements in the case. I have given your
18 details to the defence expert Alistair McLachlan
19 to contact you with a view to discussing the
20 issues in the case ..."

21 Just stopping there, the document that I was
22 trying to show you was you sending Fujitsu
23 Mr Jenkins' contact details, and you're
24 confirming here that you've done so. You
25 continue:

147

1 attendance note, but I -- at that time maybe
2 it's overlooked, it's pressure of work, or
3 whatever it is. I'm sorry it wasn't done, but
4 I --

5 **Q.** As a matter of fact, it wasn't done though?

6 **A.** Yeah.

7 **Q.** So, by this time, you're serving two witness
8 statements in ordinary form on the defence and,
9 by that time, neither of those witness
10 statements incorporated the necessary elements
11 of an expert report, the things that we
12 discussed this morning?

13 **A.** Well, I think he was -- well, I -- it was
14 8 February '10, he wasn't considered to be --
15 he'd just walked in to get everybody to
16 understand the system itself because he's
17 a specialist. It's a special system and he's
18 the specialist able to assist the prosecution,
19 the defence and the court.

20 So I can't say more than that. I mean,
21 presumably, now you've pointed it out, there
22 would have been -- I mean I -- again, you know,
23 it's -- in time, I didn't know -- you know,
24 well, maybe it was overlooked by everybody
25 concerned, as there was a number of people

146

1 "... with a view to discussing the case
2 further and analysing the data as discussed.
3 I'd be grateful if you can confirm whether he
4 has been in touch with you and you have arranged
5 a mutually convenient time for a meeting. Got
6 to be sun as soon as possible in view of the
7 trial date of 15 March at Guildford Crown
8 Court."

9 Do you agree that you provided no
10 instructions to Mr Jenkins as to how he should
11 approach this discussion with Professor
12 McLachlan?

13 **A.** Well, it was a mutual meeting into Mr -- the
14 defence expert been -- I don't know, averse with
15 the system -- with a view to discussing the
16 system, more than that. Our guy's the expert in
17 the system, in the sense that his expertise are
18 specialist in the system, and he's more or less
19 bringing the defence expert up to date as to
20 trying to get him to understand the system
21 itself.

22 I think it's no more than that. I don't
23 know what instructions I gave. I don't remember
24 or I don't recall exactly now, in detail, what
25 this meeting is and what I am asking him to do

148

1 or what --

2 **Q.** You don't tell him what you're asking him to do,
3 do you?

4 **A.** I don't remember what -- I think this meeting
5 came about purely because these gentlemen,
6 I think, either met together or they wanted to
7 get together, to really set out what they're
8 going to discuss. I mean, I don't know, prepare
9 some sort of agenda, but certainly I do not
10 recall what my involvement in this was,
11 involvement in --

12 **Q.** Well, it was you sending an email to Mr Jenkins
13 saying, "Have you had a meeting"?

14 **A.** I don't recall exactly where we are with it
15 because, to be honest, the amount of minute
16 detail you're going at, at this moment in time,
17 I can't assist you because I don't -- the time
18 is -- you know, so much time has passed from
19 there to know, that I don't really be able to
20 assist you more than I can --

21 **Q.** Do you agree Mr Singh that you failed to tell
22 Mr Jenkins: (a) how he should approach the
23 discussion with Professor McLachlan; (b) in what
24 capacity he was instructed to conduct the
25 discussion with Professor McLachlan; (c) what

149

1 then you sent Mr Jenkins an email saying, "Have
2 you had a meeting yet?" They are the only
3 circumstances.

4 **A.** Well, I think it's in agreement with the defence
5 that they wanted this meeting, purely because in
6 order to assist them to defend their client.
7 I can't -- I don't know any more than what I'm
8 telling you. I don't recall what happened, what
9 didn't happen.

10 **Q.** Can we turn, please, to POL00093946. This is
11 an application, dated 24 February, if we go to
12 the last page, please. 24 February 2010 settled
13 by Keith Hadrill of Furnival Chambers. If we go
14 back to page 1, please. It's an application to
15 stay the indictment against Mrs Misra on Count 1
16 of the indictment, on the grounds of abuse of
17 process.

18 **A.** Yes.

19 **Q.** If we just scroll through it so you get some
20 context. Look at paragraph 2, which tells us
21 the background.

22 **A.** Yes, yes.

23 **Q.** Paragraph 3, which tells us what the case is.

24 **A.** Yes.

25 **Q.** If we move on to paragraph 4, please. Then 4, 5

151

1 issues the discussion should cover; and (d)

2 importantly, what records should be made of the
3 discussion?

4 **A.** I don't recall any of -- any of that, but I --

5 **Q.** Why didn't you do any of those things?

6 **A.** I don't recall. I don't know what these
7 circumstances, the way their meeting was set up,
8 was it a preliminary one just to see -- just to
9 get him to understand the whole system or not.
10 I mean it wasn't --

11 **Q.** Well, even if it was a preliminary one, to get
12 him to explain the whole system, he would say,
13 "This is just a preliminary meeting to explain
14 the whole system, don't go beyond that for the
15 moment, Mr Jenkins, but please ensure that
16 a record is made of what you say to the defence
17 expert, because that will be disclosable in due
18 course".

19 **A.** I --

20 **Q.** You must have known that least, Mr Singh?

21 **A.** I don't recall. I mean, I don't recall as to
22 how these circumstances came about and
23 I think --

24 **Q.** The circumstances came about that you sent
25 Mr Jenkins' contact details to the defence and

150

1 and 6 tell us about the back history. Just
2 stopping there, Mr Hadrill says:

3 "The case was called on for trial in May
4 2009, stood out because of concerns over the
5 reliability of the Horizon computer system.
6 Time was given for this area of evidence to be
7 explored. New solicitors were instructed by the
8 defence."

9 Then at 5:

10 "Case was re-listed for a pre-trial review
11 and directions on 14 July 2009 and directions
12 were given which included the service of
13 experts' reports."

14 That's where I got the reference, before
15 lunch, to the autumn of 2009, a direction having
16 been given for the service of experts' reports;
17 do you see that?

18 **A.** Yes.

19 **Q.** Did you know had a direction had been given for
20 the service of experts' reports --

21 **A.** Well --

22 **Q.** -- as early as 2009?

23 **A.** I don't recall. I mean, I don't -- I mean --
24 I don't recall now in that much detail, you're
25 asking me to remember going back --

152

1 Q. Okay, paragraph 6:

2 "The prosecution, by letter dated 14/8/2009
3 said it would instruct Fujitsu, the supplier and
4 operator of the Horizon computer, to assist as
5 experts. In that letter the prosecution stated
6 the request for data had been submitted to
7 Fujitsu and acknowledged. This is ..."

8 I think we've missed a bit out at the bottom
9 of the last page but one, "and acknowledged" --
10 oh, sorry:

11 "The prosecution had stated that the request
12 for data had been submitted to Fujitsu and
13 acknowledged."

14 Then to paragraph 7, please.

15 "This is in total contradiction to the
16 statement received from Gareth Jenkins of
17 Fujitsu who states that no requests had been
18 made for any data relating to the West Byfleet
19 branch."

20 That was the issue we were looking at
21 earlier, the defence requesting disclosure of
22 the underlying transaction data as early as 2009
23 and, by February 2010, it still hadn't been
24 obtained. 7, we can skip over; 8 we can skip
25 over:

153

1 could not assist because:

2 "He'd not been given sufficient material and
3 documentation.

4 "He'd only just been instructed to assist
5 and would need time.

6 "Some of the questions raised by Professor
7 McLachlan he didn't understand.

8 "Some of the information requested from
9 Fujitsu should come from the Post Office."

10 Then the defence say this:

11 "It is apparent that the prosecution has
12 given no clear instructions to its own expert,
13 or provided him with an adequate material to
14 assist the court."

15 You would agree, on reflection, that that's
16 true, wouldn't you?

17 A. I don't know. I don't quite -- the dates --
18 I didn't realise that Mr Jenkins had been
19 identified that early. I don't recall any of
20 that.

21 Q. Had you given clear instructions to Mr Jenkins?

22 A. I think the -- I don't know. I don't recall.

23 Q. Had you provided him with adequate material to
24 assist the court?

25 A. I don't recall. I mean, I think, as I have been
155

1 "9. A view of the Post Office machinery and
2 method of working at West Byfleet was undertaken
3 by counsel and solicitors on 6 November.
4 Professor McLachlan permitted to view the same
5 on 17 November '09.

6 "10. At the hearing on 20/11/09 the
7 prosecution requested the defence help by
8 producing more detailed requests for disclosure.
9 That was done and served on 30/11/09. Despite
10 this, no responses were forthcoming until after
11 the defence listed the matter for mention."

12 Then over the page:

13 "At the hearing on 1/2/10 the defence were
14 ordered to notify the prosecution of those
15 matters which it regarded as still outstanding
16 ...

17 "The prosecution had failed until 1/2/10 to
18 instruct an expert. At the court hearing on
19 1/2/10 the prosecution stated it had identified
20 their expert, Gareth Jenkins from Fujitsu, but
21 not instructed him yet. The court confirmed
22 that the prosecution expert should report by
23 8/2/10.

24 "A short statement was served from
25 Mr Jenkins. In that report Mr Jenkins generally
154

1 saying, is that these was there basically to
2 help or assist the prosecution and the defence
3 to understand the system, because I'm not
4 a technical person. I don't know the basics,
5 let alone the actual technology involved here.
6 And that's one of the reasons why I was very
7 uncomfortable dealing with it myself.

8 That's why I had the barrister alongside
9 with me on one side and the head of the Criminal
10 Law Team on the other. That's my case --

11 Q. Thank you, Mr Singh. I'm sorry, I interrupted
12 you --

13 A. Sorry, that's one of the reasons: because it's
14 complicated. It's very, very difficult to be
15 able to do it. So I don't recall it in that
16 much detail. I don't recognise the dates.
17 I don't recall the dates. I thought it was
18 everything more or less started around about
19 February time but, as to when Gareth Jenkins was
20 identified, I don't recall now that it was that
21 early, my conversation with, you know, Mr Jones.

22 Now that you mentioned it -- and I think the
23 other difficulty is that, because of the time
24 period, a lot of the information you're coming
25 up with, you're obviously -- you know, this is
156

1 the sort of area of law you deal with, you know,
 2 the Inquiry. This is the first experience of
 3 it. I do not recall most of the stuff that is
 4 coming up at all, and I -- certainly not the
 5 dates, I don't recall. I think more or less
 6 everything was happening really, really quickly
 7 in February. I didn't realise that, going back
 8 in time six months -- I don't recall most of
 9 what's here, and I think was of it, because it's
 10 a specialist area of the law and everything
 11 else, that involved, I had the barrister more or
 12 less looking at it in minute detail.
 13 I mean I was relying on the barrister, more
 14 or less, and I think we were working alongside,
 15 he was saying, "Well, I" -- more or less, as you
 16 know, I can say generally that that's how we
 17 worked on it, but I don't recall most of what's
 18 here, the dates.
 19 **MR BEER:** All right, thank you. That can come down.
 20 Sir, that's an appropriate moment to break.
 21 **SIR WYN WILLIAMS:** Right.
 22 **MR BEER:** We would be continuing with
 23 a chronological progression through the
 24 instruction of Mr Jenkins and the compilation of
 25 his witness statements; the revelation of
 157

1 So, Mr Singh, we're going to stop this
 2 afternoon now. As you will have gathered, it
 3 will be necessary for you to return to give
 4 further evidence. I can't -- I'm sorry -- tell
 5 you precisely when that will be but the
 6 scheduling of your evidence will be done in
 7 liaison with you and your solicitors. You are
 8 now entitled to speak to your solicitors about
 9 your evidence and any further requests for
 10 evidence. So I will see you again sometime in
 11 the New Year.
 12 **THE WITNESS:** Thank you, sir.
 13 **SIR WYN WILLIAMS:** Right. On Tuesday, I'm right in
 14 remembering that we are starting at 11.00; is
 15 that right, Mr Beer?
 16 **MR BEER:** Yes, that's right. 11.00 am, Tuesday,
 17 please.
 18 **SIR WYN WILLIAMS:** Fine. All right, then.
 19 **MR BEER:** Thank you.
 20 (3.06 pm)
 21 (The hearing adjourned until 11.00 am
 22 on Tuesday, 5 December 2023)
 23
 24
 25
 159

1 material to the defence; the discovery of a bug;
 2 and whether that material was revealed or
 3 concealed from the court and the defence.
 4 Sir, I've got another 37 pages of notes to
 5 get through.
 6 **SIR WYN WILLIAMS:** Right. I think we -- yes, sorry.
 7 I think we'll break there and, obviously, in
 8 scheduling Mr Singh hereafter, we will need to
 9 take account of the time estimate for what
 10 remains, as well as what is to come.
 11 **MR BEER:** Yes, sir. I think it will be appropriate
 12 to release Mr Singh from the obligation that he
 13 would otherwise be under not to speak about the
 14 evidence he's to give --
 15 **SIR WYN WILLIAMS:** Yes.
 16 **MR BEER:** -- when he returns, because we're going to
 17 be asking him for a further witness statement on
 18 Phase 5 and 6 issues and he'll plainly need to
 19 speak to his solicitor about those.
 20 **SIR WYN WILLIAMS:** Well, that's the practice which
 21 I've adopted in relation to those witnesses who
 22 have given evidence but who are returning, is it
 23 not?
 24 **MR BEER:** It is, sir.
 25 **SIR WYN WILLIAMS:** Yes.
 158

I N D E X

JARNAIL SINGH (continued)	1
Questioned by MR BEER (continued)	1

MR BEER: [29] 1/5 1/8 5/22 5/24 6/8 22/3 52/12 52/17 52/20 110/3 110/21 111/1 111/8 111/12 111/15 135/10 135/15 136/1 136/5 136/17 137/2 137/4 157/19 157/22 158/11 158/16 158/24 159/16 159/19	11.00 [3] 159/14 159/16 159/21 11.11 [1] 52/14 11.25 [2] 52/12 52/16 12 September [1] 57/9 12 years [4] 85/11 141/19 142/11 144/2 12.34 [1] 89/11 12.50 [1] 111/9 12/13 years [1] 134/20 13 [2] 49/16 49/17 14 July [1] 103/19 14 July 2009 [1] 152/11 14/8/2009 [1] 153/2 15 [1] 49/13 15 March [1] 148/7 15.36 [1] 57/10 17 November [1] 154/5 18 May [1] 126/4 19 [1] 78/10 198 [1] 37/23 1980 [1] 141/10 1995 [1] 8/3 1996 [1] 113/17	24 February [1] 151/11 24 February '10 [1] 139/4 24 February 2010 [1] 151/12 25 [1] 52/25 27 January [2] 71/13 77/11 28 [1] 3/3 28 July 2010 [1] 127/3 28th [1] 126/9	144/8 144/15 146/14 8 September [3] 111/19 112/12 118/14 8/2/10 [1] 154/23 8th [1] 99/13	accustomed [1] 17/10 achieve [1] 18/10 acknowledged [3] 153/7 153/9 153/13 acknowledgement [1] 25/14 acquiesce [1] 42/10 act [5] 1/16 3/11 3/16 4/6 5/9 acting [5] 18/16 37/25 38/20 39/14 40/9 action [3] 96/18 96/19 104/3 actual [5] 29/2 32/15 49/23 118/7 156/5 actually [19] 4/10 13/8 19/19 23/21 28/22 29/2 34/2 36/8 40/2 43/10 43/13 44/12 44/13 45/8 65/3 73/12 109/9 121/16 140/5 add [1] 132/11 addition [2] 11/8 63/7 additions [1] 93/9 address [5] 5/2 8/22 92/11 144/21 145/8 addressed [6] 72/21 94/22 97/9 97/19 97/25 123/3 addressing [1] 96/20 adequate [3] 93/8 155/13 155/23 adjourned [1] 159/21 Adjournment [1] 111/10 administered [1] 13/21 administering [1] 13/23 admissibility [3] 18/9 18/12 26/9 admissible [1] 18/8 admission [1] 11/17 admissions [1] 12/1 adopted [1] 158/21 advice [28] 2/12 5/8 20/9 23/10 23/17 23/23 23/23 25/6 25/21 65/13 65/22 65/25 67/4 69/13 72/25 73/9 73/13 74/13 74/19 75/4 82/12 83/21 87/17 120/22 129/17 131/16 134/13 143/14 advices [2] 4/21 5/17 advise [6] 1/15 7/19 19/13 28/6 74/3 104/2 advised [8] 2/1 7/12 13/14 73/25 75/8 82/21 85/8 132/13
SIR WYN WILLIAMS: [31] 1/7 6/6 21/24 51/9 51/19 52/1 52/4 52/7 52/13 52/19 110/18 110/23 111/2 111/14 134/10 134/14 135/6 135/12 135/18 136/4 136/7 136/19 136/23 137/3 157/21 158/6 158/15 158/20 158/25 159/13 159/18	2 2 February [2] 90/1 144/7 2-4 [2] 94/5 95/17 2.25 [1] 136/17 2.26 [1] 136/24 2.35 [3] 136/17 136/19 137/1 2.53 [1] 93/1 20 [1] 49/14 20/11/09 [1] 154/6 2006 [7] 20/1 20/21 21/19 22/13 24/9 24/24 25/7 2009 [10] 48/6 48/14 49/24 64/10 152/4 152/11 152/15 152/22 153/2 153/22 2010 [24] 32/3 53/2 62/8 67/5 71/13 89/8 89/14 106/14 111/20 111/20 112/13 113/14 118/14 123/15 124/8 125/2 125/7 127/3 127/19 128/9 129/13 145/2 151/12 153/23 2012 [3] 8/3 54/17 54/18 2012/2013 [1] 123/7 2013 [2] 57/16 123/7 2023 [2] 1/1 159/22 22 February [2] 133/8 147/14 23 [1] 67/10 24 [2] 36/11 41/19	3 3 years [1] 103/24 3.00 [3] 110/5 110/7 111/4 3.00 pm [1] 110/13 3.00-ish [1] 144/14 3.06 [1] 159/20 3.09 [1] 144/6 3.39 [3] 92/23 94/3 95/13 30/11/09 [1] 154/9 33 [1] 21/18 37 pages [1] 158/4	A able [20] 5/22 19/12 19/19 24/20 40/1 40/20 58/24 78/1 84/8 101/3 106/21 106/22 139/23 140/2 140/16 141/21 142/4 146/18 149/19 156/15 about [92] 4/4 4/4 8/3 9/13 10/2 10/3 11/17 12/9 12/14 12/15 12/21 13/24 15/8 16/15 20/18 21/11 21/14 22/5 25/23 29/1 32/1 33/23 34/8 35/11 40/17 47/2 47/15 47/18 47/19 47/20 47/21 48/3 48/20 49/5 49/13 49/21 52/2 54/19 54/24 54/25 55/4 59/6 67/21 68/10 69/16 69/18 69/19 69/21 70/18 70/20 73/21 74/10 74/24 82/23 83/18 87/10 90/20 91/15 106/20 107/1 112/17 113/2 114/9 116/22 116/24 117/4 118/17 119/14 119/20 119/25 120/24 121/1 121/17 122/9 125/25 129/5 129/17 131/4 131/6 134/16 136/6 137/20 139/10 140/5 149/5 150/22 150/24 152/1 156/18 158/13 158/19 159/8 above [1] 3/4 absence [1] 120/25 absolutely [2] 116/14 141/18 abuse [1] 151/16 academic [3] 20/4 20/22 21/20 accede [1] 135/25 accept [3] 4/19 121/18 122/12 access [1] 104/8 accordingly [1] 74/3 account [6] 3/19 5/11 5/12 11/5 11/10 158/9 accountant [1] 103/21 accounting [1] 66/21 accounts [1] 69/7 accreditation [3] 20/6 20/24 21/22 accuracy [1] 103/22	
THE SOLICITOR: [3] 5/20 5/23 6/7	3 3 years [1] 103/24 3.00 [3] 110/5 110/7 111/4 3.00 pm [1] 110/13 3.00-ish [1] 144/14 3.06 [1] 159/20 3.09 [1] 144/6 3.39 [3] 92/23 94/3 95/13 30/11/09 [1] 154/9 33 [1] 21/18 37 pages [1] 158/4	4 4.00 [2] 81/9 103/9 4.00 pm [1] 100/17 4.28 [2] 99/3 100/15 4.30 [2] 99/10 105/12 4.57 [2] 101/15 103/8	5 5 February [7] 89/11 89/14 90/11 92/24 108/15 129/13 133/7 5 February 2010 [1] 89/8 5 January [1] 67/5 5,000 [2] 9/13 9/14 5.10 [1] 106/15 5th [4] 99/3 99/15 100/1 100/5	
THE WITNESS: [2] 136/22 159/12	4 4.00 [2] 81/9 103/9 4.00 pm [1] 100/17 4.28 [2] 99/3 100/15 4.30 [2] 99/10 105/12 4.57 [2] 101/15 103/8	5 5 February [7] 89/11 89/14 90/11 92/24 108/15 129/13 133/7 5 February 2010 [1] 89/8 5 January [1] 67/5 5,000 [2] 9/13 9/14 5.10 [1] 106/15 5th [4] 99/3 99/15 100/1 100/5	6 6 November [1] 154/3 67 [1] 37/22 69 [2] 36/11 41/19 6th [1] 100/9	
'09 [1] 154/5 '10 [4] 109/6 118/17 139/4 146/14 '12 [1] 57/9 '23 [1] 57/10 'expert' [1] 91/18 'for [1] 95/5 'lost' [1] 107/9	5 5 February [7] 89/11 89/14 90/11 92/24 108/15 129/13 133/7 5 February 2010 [1] 89/8 5 January [1] 67/5 5,000 [2] 9/13 9/14 5.10 [1] 106/15 5th [4] 99/3 99/15 100/1 100/5	6 6 November [1] 154/3 67 [1] 37/22 69 [2] 36/11 41/19 6th [1] 100/9	7 7 May [2] 126/7 126/11 7 May 2010 [1] 124/8 70 [1] 52/25 7th [1] 100/11	
0 09 [2] 154/6 154/9	6 6 November [1] 154/3 67 [1] 37/22 69 [2] 36/11 41/19 6th [1] 100/9	7 7 May [2] 126/7 126/11 7 May 2010 [1] 124/8 70 [1] 52/25 7th [1] 100/11	8 8 February [7] 81/10 89/24 99/9 139/7	
1 1 December 2023 [1] 1/1 1 February [1] 81/3 1 July [1] 57/16 1.50 [4] 110/4 110/6 111/3 111/11 1/2/10 [3] 154/13 154/17 154/19 10 [7] 49/13 141/19 154/6 154/13 154/17 154/19 154/23 10 years [1] 85/10 10.00 [1] 1/2 10/12 years [1] 68/24 11 [1] 116/11 11 days [1] 126/5 11 December [1] 64/10 11 October [1] 126/16 11 October 2010 [1] 128/9	7 7 May [2] 126/7 126/11 7 May 2010 [1] 124/8 70 [1] 52/25 7th [1] 100/11	8 8 February [7] 81/10 89/24 99/9 139/7		

A	78/15 124/1 124/18 126/16 128/3 128/13 128/16 128/24 151/4	138/12 149/15 analyse [2] 39/22 103/21	131/1 132/5 132/11 132/15 132/16 132/18 132/25 133/1 133/3 135/8 138/14 139/5 140/20 142/10 145/13 145/18 150/4 150/4 150/5 151/7 153/18 155/19 159/9	113/6 113/6 116/19 126/18 127/6 133/19 135/7 136/5 139/3 140/1 142/5 145/15 148/17 149/14 151/2 158/22 159/7 159/14 area [5] 63/21 91/8 152/6 157/1 157/10 areas [8] 32/14 47/7 77/23 91/13 91/19 92/14 95/5 128/3 aren't [4] 21/14 61/11 84/2 126/19 argue [1] 41/24 arising [1] 51/12 arose [1] 136/9 around [10] 9/13 22/22 23/11 23/15 24/7 48/20 49/21 105/25 118/17 156/18 arranged [2] 78/23 148/4 as [274] ascertained [1] 133/25 ascertaining [1] 116/24 aside [1] 71/2 ask [17] 5/7 15/8 33/9 36/15 44/19 68/1 75/9 76/2 76/20 84/17 87/18 98/9 102/7 110/14 122/9 132/14 137/9 asked [27] 4/15 4/25 5/1 5/1 16/21 16/22 33/7 33/24 63/2 64/25 65/2 71/16 76/23 81/11 81/20 90/16 95/4 95/25 97/16 97/23 107/16 112/16 117/16 118/23 134/23 139/18 140/13 asking [37] 4/4 4/4 10/3 20/20 21/16 23/19 30/5 30/23 40/12 48/11 59/17 60/13 64/2 69/18 69/19 69/20 70/10 74/24 79/17 86/14 92/8 96/13 96/14 99/22 105/11 105/12 105/15 105/22 110/12 112/17 120/24 142/5 144/21 148/25 149/2 152/25 158/17 aspect [2] 32/16 143/2 assist [41] 6/17 19/8 19/13 19/20 28/8 40/20 44/12 44/13 50/23 54/13 58/8 59/12 62/11 79/20 80/23 86/5 86/25
advising [5] 15/4 18/15 27/5 71/5 96/17	Ahead [1] 91/9 aim [2] 1/21 4/17 Alan [1] 67/17 Alistair [1] 147/18 all [60] 6/4 17/22 18/14 19/7 22/7 28/7 33/11 34/6 37/19 41/10 46/5 48/12 49/7 49/10 51/3 58/8 60/20 61/20 69/3 71/16 73/10 74/24 76/25 79/10 81/8 81/20 86/19 90/15 93/7 101/6 102/8 110/1 110/24 111/2 112/21 114/23 115/7 115/15 117/15 120/3 120/21 122/22 125/8 126/22 129/2 133/12 135/6 135/22 136/14 136/19 136/21 140/17 140/19 140/24 142/18 143/15 143/23 157/4 157/19 159/18 allegations [1] 2/23 alleged [1] 66/22 allow [1] 80/19 almost [2] 65/10 122/19 alone [3] 141/15 143/10 156/5 along [1] 37/19 alongside [8] 131/19 131/24 132/3 137/25 141/14 143/4 156/8 157/14 already [1] 138/5 also [21] 2/19 22/6 25/22 36/20 39/22 63/7 65/1 77/25 82/16 93/20 94/16 99/6 104/16 104/17 110/19 122/19 127/10 129/3 139/11 139/24 142/16 alternative [3] 7/8 7/24 8/9 although [1] 53/8 always [7] 7/21 10/22 10/23 33/1 72/8 119/13 143/13 am [15] 1/2 30/4 52/14 52/16 54/4 64/18 95/8 96/13 130/9 138/9 139/21 141/10 148/25 159/16 159/21 amending [1] 117/6 amount [17] 3/10 4/2 8/13 8/13 8/14 9/5 9/6 9/8 9/10 9/15 10/12 10/12 10/14 11/5 88/5	analysing [2] 102/10 148/2 analysis [1] 2/23 Andy [2] 54/22 54/23 angle [1] 123/10 Anne [4] 67/12 67/18 82/5 82/10 another [8] 1/21 41/5 41/14 101/3 110/11 123/2 125/20 158/4 answer [52] 10/20 11/12 11/15 16/17 17/4 21/24 25/3 26/10 28/5 30/13 36/15 42/12 42/23 51/11 51/21 52/2 52/2 52/4 54/8 65/7 67/1 68/23 69/8 70/19 70/24 74/23 77/5 77/6 85/12 85/14 86/2 86/18 97/12 97/20 98/3 98/4 98/10 101/12 102/4 103/10 104/24 106/1 106/2 106/20 108/17 119/1 119/1 122/8 125/14 128/6 138/2 138/16 answered [7] 81/9 94/5 94/10 95/18 96/2 96/22 118/25 answers [2] 91/11 92/9 anticipate [1] 68/5 any [114] 4/21 6/4 7/15 9/4 10/22 11/1 12/6 15/6 17/24 18/19 21/8 22/16 23/13 25/17 26/18 27/12 27/20 27/23 28/1 28/11 28/20 28/21 30/20 30/22 31/17 31/19 31/24 33/5 34/23 36/7 37/19 37/20 42/7 46/18 50/22 52/5 53/7 54/13 56/1 60/4 60/19 62/10 62/11 68/1 68/2 68/9 68/12 68/13 73/18 75/10 75/11 76/2 76/3 76/21 76/22 80/2 80/19 82/2 82/16 84/15 84/18 84/18 84/20 84/23 85/20 87/15 87/19 87/19 88/4 88/11 89/5 93/9 94/16 96/1 96/4 97/3 97/10 102/7 106/20 106/23 107/3 107/16 108/7 110/13 110/18 113/10 113/11 117/22 121/23 122/3 128/20	apart [3] 18/17 59/15 132/11 apparent [2] 19/11 155/11 apparently [2] 82/5 91/21 appear [2] 76/24 90/5 appears [6] 62/16 67/13 67/21 83/10 87/24 88/15 application [4] 77/14 127/10 151/11 151/14 applied [4] 8/18 13/9 13/15 116/7 apply [2] 13/4 80/6 appreciate [3] 46/21 47/1 65/5 approach [4] 12/8 145/14 148/11 149/22 approached [4] 26/7 30/24 71/6 71/7 approaching [2] 68/7 86/5 appropriate [6] 13/25 14/19 25/15 102/3 157/20 158/11 appropriately [1] 16/8 April [1] 8/3 April 2012 [1] 8/3 are [62] 3/25 8/2 15/17 15/18 19/12 20/6 21/15 48/3 48/3 50/2 57/10 60/12 63/3 65/2 65/4 65/6 65/9 68/1 71/21 73/2 74/1 76/2 79/8 80/10 82/16 82/18 84/20 84/21 86/10 90/3 91/13 91/15 94/16 94/18 96/1 97/1 97/15 97/18 102/8 104/1 105/10 109/18 109/21 112/25	

A	averse [1] 148/14	38/8 38/19 38/22	114/13 120/11 120/22	25/19 26/10 26/15
assist... [24] 87/15	avoid [2] 78/16	39/13 39/18 40/9	123/22 125/22 131/14	27/18 29/2 31/22
89/5 90/18 117/14	123/23	40/20 43/9 45/1 45/5	134/13 134/18 135/1	32/22 33/14 52/1 68/7
127/14 138/14 139/5	aware [36] 17/25	45/17 45/23 45/25	135/2 135/3 135/11	68/18 69/2 69/19 78/8
140/20 141/23 142/7	34/14 34/15 42/24	46/1 46/10 50/1 53/12	135/15 138/15 140/14	93/9 111/18 117/17
144/2 145/3 145/18	43/9 45/16 45/23 46/4	54/7 55/13 57/21 61/8	141/2 142/2 142/9	121/12 123/3 127/7
146/18 147/6 149/17	50/20 68/1 75/10 76/2	62/16 62/18 62/19	143/2 143/9 143/10	128/10 129/10 129/15
149/20 151/6 153/4	76/21 82/18 83/19	64/25 65/9 67/10	143/14 144/3 146/16	138/6 141/3 152/14
155/1 155/4 155/14	84/18 84/21 85/15	67/19 68/5 70/11	147/4 149/5 149/15	beforehand [1]
155/24 156/2	87/19 87/23 88/8	70/12 71/6 71/7 71/18	149/17 150/17 151/5	125/24
assistance [6] 19/14	94/18 96/2 98/25	72/1 72/25 76/12	152/4 155/1 156/3	beginning [5] 60/15
19/15 25/2 25/11	107/5 107/23 107/24	76/24 78/1 78/4 79/2	156/13 156/23 157/9	119/21 119/23 134/15
53/20 90/17	113/22 113/24 122/17	79/4 79/4 79/5 79/11	158/16	145/1
assistant [2] 72/5	125/21 130/9 132/15	79/13 80/1 80/19	become [2] 89/8	being [25] 14/12
82/5	133/19 137/14 139/21	80/21 80/24 80/25	90/13	14/13 16/21 16/22
assisted [2] 68/15	awareness [1] 68/11	81/9 81/16 81/22	been [127] 4/21	17/4 28/17 30/3 31/8
78/4	away [6] 118/18	82/18 83/10 83/22	10/14 10/17 11/6	34/17 50/14 59/15
assisting [3] 27/1	119/11 119/18 119/24	84/7 87/24 88/15	11/14 12/22 16/7 17/1	60/2 60/8 65/2 78/4
35/14 35/14	132/4 134/21	89/19 89/21 90/14	23/4 24/20 34/11	84/8 88/19 93/10
assume [2] 86/16	B	91/6 91/17 91/23	34/14 36/1 37/17	96/17 96/19 96/19
113/21	back [34] 6/15 6/16	92/11 92/12 94/18	37/21 41/3 41/4 41/4	107/24 126/19 135/3
assumed [1] 53/9	10/16 11/7 19/21 25/6	95/6 96/18 98/13	41/12 41/13 42/19	142/18
Assuming [1] 113/24	10/16 11/7 19/21 25/6	98/16 98/21 99/1 99/1	43/22 49/25 50/20	belief [1] 134/22
assumption [2]	41/19 56/7 56/7 74/4	99/21 99/25 100/9	51/24 53/14 53/24	believe [1] 14/13
53/21 53/22	75/15 78/17 79/5	100/10 102/1 102/8	53/24 53/25 56/10	believed [1] 61/4
assumptions [1]	84/11 88/13 89/21	103/20 106/21 106/22	58/3 58/24 60/7 63/21	below [5] 9/15 76/11
23/6	90/9 91/4 95/24 101/4	107/8 110/19 112/3	65/20 66/21 67/22	94/6 95/3 95/18
assure [1] 142/12	103/16 106/14 110/4	112/6 112/6 112/8	68/2 68/12 69/9 69/11	best [5] 15/21 28/5
assured [1] 143/7	113/8 113/9 123/14	113/20 114/22 116/16	72/7 74/21 75/2 75/11	58/5 86/25 147/6
at [200]	128/11 129/22 141/16	117/3 117/9 117/16	76/3 80/17 83/13	better [3] 51/15
at page 2 [1] 130/2	145/2 151/14 152/1	118/2 120/6 123/20	83/25 84/6 85/25	59/11 85/20
attach [2] 62/24 90/6	152/25 157/7	126/12 131/7 132/7	86/16 87/20 88/19	between [2] 15/4
attached [7] 66/8	background [6] 6/13	133/5 133/11 133/25	89/17 91/1 92/2 92/15	45/19
76/11 90/24 101/16	24/6 103/4 107/22	135/10 135/13 135/20	94/5 94/21 95/17	beyond [4] 2/6 2/7
130/1 139/9 139/15	131/12 151/21	137/21 138/25 139/23	97/13 99/15 100/11	111/5 150/14
attaching [1] 76/11	backwards [2]	140/1 140/2 140/16	102/22 102/24 103/3	big [2] 19/21 110/2
attempting [1] 3/14	100/24 108/16	141/21 146/14 147/12	104/11 104/25 105/25	bit [20] 1/19 6/9 6/12
attendance [6] 62/5	barrister [15] 43/25	148/3 148/6 149/15	106/5 107/9 107/15	7/7 39/17 49/5 51/2
62/7 123/14 126/3	71/16 81/13 81/20	149/19 150/2 150/17	108/15 110/16 113/21	51/21 54/16 64/18
127/2 146/1	82/1 82/8 120/13	152/6 156/14 157/22	113/22 113/25 116/24	79/18 84/25 89/3 90/4
attended [7] 12/13	120/20 131/18 141/2	158/11 158/13 158/17	117/20 118/11 118/12	92/24 93/11 139/17
32/2 54/2 59/3 59/7	142/13 143/12 156/8	159/3 159/5 159/6	118/22 118/23 119/4	142/2 147/12 153/8
61/22 79/12	157/11 157/13	bears [2] 123/9	120/12 123/22 125/1	bits [1] 73/14
attending [3] 33/12	barristers' [1] 31/23	136/13	125/21 127/22 127/24	black [2] 58/25
79/13 79/15	bases [1] 10/13	became [1] 19/11	130/10 131/8 132/16	127/23
attention [3] 9/19	basic [1] 101/8	because [97] 2/3 3/4	133/6 134/21 138/4	blame [1] 3/14
95/22 97/3	basically [13] 8/18	3/9 4/23 11/12 19/16	138/7 138/23 139/18	blown [1] 123/20
audible [1] 128/6	28/19 35/13 36/4 43/6	20/11 20/15 20/17	140/6 140/14 141/9	bodies [1] 20/19
auditable [1] 86/10	44/1 44/6 44/24 50/7	22/10 24/22 26/11	141/19 141/20 141/22	Bolc [1] 54/20
August [3] 8/3	106/10 138/10 142/22	26/22 26/25 27/14	141/24 141/25 142/3	both [13] 2/16 21/16
119/21 119/22	156/1	28/3 29/18 30/13	142/4 142/10 142/12	38/9 38/13 40/8 43/14
August 1995 [1] 8/3	basics [1] 156/4	30/20 31/14 33/16	143/13 145/24 146/22	52/21 70/12 71/6 71/8
author [1] 72/19	basis [7] 7/2 7/18	34/25 35/4 35/13	148/4 148/14 152/16	74/25 86/10 87/4
authorisation [1]	24/23 26/12 30/24	35/15 35/25 36/6	152/19 153/6 153/12	bothered [1] 102/6
104/17	36/2 88/16	38/24 39/19 39/25	153/17 153/23 155/2	bottom [4] 2/10 2/25
authorised [1] 79/7	batch [1] 6/20	43/7 44/10 44/20	155/4 155/18 155/25	41/20 153/8
authorising [1] 13/13	be [160] 4/8 4/9 5/22	45/15 45/17 45/25	BEER [9] 1/4 21/24	boundless [1] 55/11
authority [2] 13/22	8/17 10/16 12/5 13/12	46/8 48/4 48/17 49/3	51/23 110/20 135/8	Bowyer [1] 54/21
14/20	15/1 15/21 17/3 18/5	49/25 51/23 52/6 54/2	135/14 136/16 159/15	box [1] 26/4
autumn [3] 48/6	18/6 19/19 25/1 25/23	60/9 60/18 61/2 61/7	160/5	branch [2] 65/10
48/14 152/15	26/5 26/10 29/15	61/15 66/4 79/19	Beer's [1] 51/20	153/19
available [2] 6/23	29/17 29/24 31/1	84/13 85/9 86/16	before [35] 2/4 2/5	branches [1] 69/4
6/25	32/24 36/17 36/20	86/19 96/8 97/13	6/2 6/22 21/24 23/15	breach [3] 3/9 4/2
	36/22 37/25 37/25	102/14 104/22 109/20	23/17 24/5 25/19	8/12

B	86/25 89/7 89/9 90/17 91/19 92/13 92/22 93/2 93/11 93/23 94/10 99/2 100/20 100/23 101/6 101/14 103/25 104/5 104/14 105/3 106/3 108/12 109/3 109/10 110/6 111/12 111/17 111/24 112/12 112/21 112/25 114/11 123/1 123/2 123/8 123/11 123/17 123/20 125/5 126/2 127/2 128/1 128/4 128/9 129/9 129/25 130/2 130/15 130/16 133/7 133/16 133/25 134/7 135/8 137/2 137/3 137/9 137/10 138/18 138/19 138/20 139/13 139/14 140/19 142/12 143/7 144/5 144/9 147/8 147/9 148/3 149/20 151/10 153/24 153/24 157/16 157/19	capacity [3] 79/13 80/10 149/24 care [1] 58/13 career [1] 142/9 careful [2] 32/20 84/3 caretaking [1] 132/3 carried [5] 13/20 27/25 30/8 70/16 117/20 carry [3] 13/19 31/4 89/12 case [59] 2/4 4/24 7/20 8/24 9/13 10/22 18/18 19/2 22/10 26/16 27/11 32/10 36/13 37/19 38/5 39/24 42/18 43/8 54/17 54/25 55/5 55/6 55/8 55/18 55/20 61/9 62/14 68/14 79/21 81/11 81/16 88/6 92/3 107/15 111/25 117/2 117/10 117/13 117/19 120/21 121/6 121/13 122/20 126/6 127/5 131/22 131/23 134/21 135/3 139/21 139/24 140/2 147/17 147/20 148/1 151/23 152/3 152/10 156/10 cases [16] 8/6 18/19 20/16 20/16 21/9 34/12 43/24 50/8 66/14 91/24 98/24 117/19 120/8 120/11 128/17 135/4 Cash [2] 54/22 54/23 Castleton [2] 57/18 67/11 casual [1] 87/21 categories [1] 68/20 cause [1] 132/6 caused [2] 137/21 139/20 causing [1] 138/24 caution [13] 7/11 7/13 8/4 9/3 9/9 9/15 10/8 10/15 11/25 13/1 13/13 13/25 15/1 cautions [10] 6/23 6/25 7/3 7/19 8/16 8/22 12/14 12/16 12/21 14/24 cc'd [1] 54/22 Central [3] 12/12 12/17 12/19 certain [7] 29/19 29/20 29/24 46/10 73/14 80/20 141/22 certainly [81] 4/19 5/16 6/15 7/12 7/18 8/6 8/19 8/23 8/25 10/21 12/9 12/11 12/12 12/24 13/1	13/18 20/10 20/21 21/6 21/12 22/7 22/20 23/15 24/5 24/18 25/5 25/20 29/6 31/25 32/14 32/23 32/23 33/1 33/24 34/10 35/19 41/6 42/2 42/4 53/17 60/9 68/14 69/8 69/13 70/3 70/4 70/22 72/3 79/23 80/17 80/18 80/24 82/25 84/9 85/1 85/24 87/12 88/1 88/11 98/24 100/4 100/21 102/24 104/21 106/7 115/6 118/15 122/13 125/5 125/21 125/22 125/23 127/23 129/2 131/15 131/18 132/2 138/13 145/12 149/9 157/4 cetera [7] 82/7 82/7 124/2 128/13 128/13 130/12 130/12 chains [1] 90/6 Chairman [1] 137/5 challenge [2] 29/9 55/9 challenged [2] 143/15 143/16 challenging [2] 89/16 103/22 chambers [7] 12/24 31/23 67/12 67/18 82/5 82/10 151/13 chance [1] 86/22 change [3] 42/24 43/5 97/21 changed [3] 14/12 14/13 25/16 chapter [1] 68/22 charging [1] 2/13 chat [5] 32/8 32/11 33/21 134/7 134/12 chatted [2] 61/23 62/1 chatting [1] 32/20 check [7] 6/3 6/19 68/6 77/24 106/21 107/14 109/10 checklist [1] 8/6 checks [1] 107/17 Chesterfield [1] 127/12 choice [2] 54/19 55/4 Christine [1] 2/14 chronological [1] 157/23 circumstances [22] 4/12 8/16 9/4 9/12 9/12 9/24 11/2 14/25 34/9 35/21 35/23 48/24 72/10 107/10 130/11 131/8 135/7 142/6 150/7 150/22	150/24 151/3 cited [1] 117/22 civil [4] 21/5 21/17 22/1 67/16 clarified [2] 82/18 94/18 clarify [1] 137/7 clarity [1] 71/22 clear [14] 102/8 106/19 107/7 108/4 109/21 117/25 129/23 130/8 130/19 130/25 140/3 141/25 155/12 155/21 clearly [2] 65/8 126/20 client [3] 77/25 80/2 151/6 clock [1] 145/2 close [2] 55/13 111/21 clumsiness [2] 59/24 59/25 clumsy [5] 56/6 56/9 56/17 57/12 58/3 Co [1] 136/2 Code [3] 8/19 8/20 113/16 cogent [2] 135/8 135/24 collate [1] 116/25 collecting [1] 114/19 collective [2] 143/21 143/24 column [3] 112/4 112/6 112/6 come [30] 6/15 6/16 7/10 19/18 19/21 20/12 23/21 26/23 27/19 40/16 40/18 40/25 41/7 48/10 48/12 50/8 51/6 59/5 79/5 105/2 110/4 113/9 114/9 123/1 129/9 141/16 147/8 155/9 157/19 158/10 comes [3] 5/13 9/14 89/1 comfortable [2] 120/12 143/9 coming [6] 21/12 33/8 80/7 129/22 156/24 157/4 comment [4] 99/6 112/6 144/19 145/7 commented [1] 73/24 comments [5] 93/8 101/17 101/19 101/25 139/11 commercial [7] 45/18 87/9 103/1 104/16 105/6 106/4 106/9	
C	calendar [1] 99/23 call [2] 2/13 127/4 called [5] 31/18 82/4 111/20 129/20 152/3 Callendar [11] 67/14 67/22 68/11 82/4 94/11 133/22 133/23 137/17 139/11 139/19 139/22 calling [1] 43/3 came [26] 19/8 21/18 27/5 27/5 28/3 28/17 30/3 33/23 34/8 35/12 38/21 45/8 48/19 50/14 50/15 59/10 59/14 60/20 62/19 84/11 91/4 120/14 121/17 149/5 150/22 150/24 can [147] 1/5 1/11 1/18 1/19 2/8 2/10 2/24 5/7 5/20 5/23 6/13 6/15 6/19 12/6 15/6 15/8 15/25 19/12 20/10 26/15 28/5 30/4 31/3 34/21 35/16 36/10 37/5 37/22 39/9 40/15 41/19 44/4 51/23 52/5 52/6 52/12 52/17 52/24 53/4 54/14 54/21 57/21 58/5 59/5 62/13 63/11 64/7 64/8 64/10 65/3 65/13 66/1 66/6 67/3 67/7 71/12 71/15 72/18 73/9 75/21 75/24 77/8 77/22 79/20 79/23 80/1 80/5 81/13 83/3 86/11	can't [107] 7/16 10/20 11/11 12/23 13/10 14/22 15/5 19/18 24/17 32/17 32/25 32/25 33/23 42/12 42/23 44/1 44/3 45/5 46/2 52/6 53/16 54/7 57/11 58/4 60/12 61/8 62/11 62/11 63/14 63/19 63/20 63/21 63/23 66/4 67/1 68/22 68/23 69/8 69/17 70/2 70/17 70/24 70/24 72/14 72/16 73/18 74/22 77/5 77/6 79/24 83/1 83/14 84/9 84/13 85/9 85/12 85/13 85/20 85/23 86/14 86/18 87/12 87/14 88/3 88/11 88/24 89/4 90/2 92/11 93/23 96/4 96/13 97/12 97/20 98/2 98/2 98/9 98/10 100/3 103/10 104/25 108/14 108/17 109/19 113/20 113/22 113/22 118/6 118/19 122/24 125/20 129/1 131/3 132/11 132/21 138/1 138/14 139/5 140/9 144/2 145/3 145/16 145/18 146/20 149/17 151/7 159/4 cannot [6] 53/7 80/23 91/14 108/3 125/17 140/10 capable [1] 69/6	capacity [3] 79/13 80/10 149/24 care [1] 58/13 career [1] 142/9 careful [2] 32/20 84/3 caretaking [1] 132/3 carried [5] 13/20 27/25 30/8 70/16 117/20 carry [3] 13/19 31/4 89/12 case [59] 2/4 4/24 7/20 8/24 9/13 10/22 18/18 19/2 22/10 26/16 27/11 32/10 36/13 37/19 38/5 39/24 42/18 43/8 54/17 54/25 55/5 55/6 55/8 55/18 55/20 61/9 62/14 68/14 79/21 81/11 81/16 88/6 92/3 107/15 111/25 117/2 117/10 117/13 117/19 120/21 121/6 121/13 122/20 126/6 127/5 131/22 131/23 134/21 135/3 139/21 139/24 140/2 147/17 147/20 148/1 151/23 152/3 152/10 156/10 cases [16] 8/6 18/19 20/16 20/16 21/9 34/12 43/24 50/8 66/14 91/24 98/24 117/19 120/8 120/11 128/17 135/4 Cash [2] 54/22 54/23 Castleton [2] 57/18 67/11 casual [1] 87/21 categories [1] 68/20 cause [1] 132/6 caused [2] 137/21 139/20 causing [1] 138/24 caution [13] 7/11 7/13 8/4 9/3 9/9 9/15 10/8 10/15 11/25 13/1 13/13 13/25 15/1 cautions [10] 6/23 6/25 7/3 7/19 8/16 8/22 12/14 12/16 12/21 14/24 cc'd [1] 54/22 Central [3] 12/12 12/17 12/19 certain [7] 29/19 29/20 29/24 46/10 73/14 80/20 141/22 certainly [81] 4/19 5/16 6/15 7/12 7/18 8/6 8/19 8/23 8/25 10/21 12/9 12/11 12/12 12/24 13/1	13/18 20/10 20/21 21/6 21/12 22/7 22/20 23/15 24/5 24/18 25/5 25/20 29/6 31/25 32/14 32/23 32/23 33/1 33/24 34/10 35/19 41/6 42/2 42/4 53/17 60/9 68/14 69/8 69/13 70/3 70/4 70/22 72/3 79/23 80/17 80/18 80/24 82/25 84/9 85/1 85/24 87/12 88/1 88/11 98/24 100/4 100/21 102/24 104/21 106/7 115/6 118/15 122/13 125/5 125/21 125/22 125/23 127/23 129/2 131/15 131/18 132/2 138/13 145/12 149/9 157/4 cetera [7] 82/7 82/7 124/2 128/13 128/13 130/12 130/12 chains [1] 90/6 Chairman [1] 137/5 challenge [2] 29/9 55/9 challenged [2] 143/15 143/16 challenging [2] 89/16 103/22 chambers [7] 12/24 31/23 67/12 67/18 82/5 82/10 151/13 chance [1] 86/22 change [3] 42/24 43/5 97/21 changed [3] 14/12 14/13 25/16 chapter [1] 68/22 charging [1] 2/13 chat [5] 32/8 32/11 33/21 134/7 134/12 chatted [2] 61/23 62/1 chatting [1] 32/20 check [7] 6/3 6/19 68/6 77/24 106/21 107/14 109/10 checklist [1] 8/6 checks [1] 107/17 Chesterfield [1] 127/12 choice [2] 54/19 55/4 Christine [1] 2/14 chronological [1] 157/23 circumstances [22] 4/12 8/16 9/4 9/12 9/12 9/24 11/2 14/25 34/9 35/21 35/23 48/24 72/10 107/10 130/11 131/8 135/7 142/6 150/7 150/22	150/24 151/3 cited [1] 117/22 civil [4] 21/5 21/17 22/1 67/16 clarified [2] 82/18 94/18 clarify [1] 137/7 clarity [1] 71/22 clear [14] 102/8 106/19 107/7 108/4 109/21 117/25 129/23 130/8 130/19 130/25 140/3 141/25 155/12 155/21 clearly [2] 65/8 126/20 client [3] 77/25 80/2 151/6 clock [1] 145/2 close [2] 55/13 111/21 clumsiness [2] 59/24 59/25 clumsy [5] 56/6 56/9 56/17 57/12 58/3 Co [1] 136/2 Code [3] 8/19 8/20 113/16 cogent [2] 135/8 135/24 collate [1] 116/25 collecting [1] 114/19 collective [2] 143/21 143/24 column [3] 112/4 112/6 112/6 come [30] 6/15 6/16 7/10 19/18 19/21 20/12 23/21 26/23 27/19 40/16 40/18 40/25 41/7 48/10 48/12 50/8 51/6 59/5 79/5 105/2 110/4 113/9 114/9 123/1 129/9 141/16 147/8 155/9 157/19 158/10 comes [3] 5/13 9/14 89/1 comfortable [2] 120/12 143/9 coming [6] 21/12 33/8 80/7 129/22 156/24 157/4 comment [4] 99/6 112/6 144/19 145/7 commented [1] 73/24 comments [5] 93/8 101/17 101/19 101/25 139/11 commercial [7] 45/18 87/9 103/1 104/16 105/6 106/4 106/9

C	commission [1] 63/17 commissioning [1] 113/4 committing [1] 1/17 common [5] 21/17 26/20 51/5 60/17 97/5 commonly [1] 128/17 communicated [1] 76/8 communicating [1] 71/25 communication [7] 63/25 71/13 79/25 108/23 130/24 134/3 137/11 communications [5] 5/5 31/6 62/17 90/7 133/3 compare [2] 83/9 139/25 compilation [1] 157/24 compile [1] 123/25 compiling [1] 124/17 complete [3] 4/7 111/5 115/15 completed [3] 81/12 112/3 112/6 completely [2] 86/21 106/6 completes [2] 82/15 94/15 compliant [1] 26/8 complicated [1] 156/14 complied [7] 17/19 25/10 26/5 58/19 61/15 126/23 127/21 comply [2] 36/23 125/25 comprises [1] 128/12 computer [2] 152/5 153/4 concealed [1] 158/3 concentrate [1] 51/20 concentrating [1] 2/5 concern [7] 49/18 49/24 91/20 92/14 96/3 97/8 105/4 concerned [5] 53/17 104/21 105/5 106/5 146/25 concerning [3] 62/17 67/17 113/3 concerns [4] 49/25 65/1 74/5 152/4 concise [1] 60/8 conclude [1] 115/11 concluded [1] 42/19	conclusion [2] 3/3 42/18 conclusions [2] 20/2 26/19 condition [3] 10/8 10/9 11/24 conditions [3] 18/8 60/18 80/20 conduct [1] 149/24 conducting [1] 86/9 conference [10] 23/10 28/25 32/2 33/13 33/25 34/7 53/1 61/23 62/8 125/24 conferences [1] 31/19 confirm [3] 76/16 89/20 148/3 confirmation [1] 110/24 confirmed [2] 127/6 154/21 confirming [1] 147/24 confirms [1] 34/21 conflated [2] 85/4 88/19 confused [5] 35/10 35/11 35/12 35/17 35/18 confusion [1] 109/25 consider [12] 4/16 16/22 37/24 38/19 38/21 39/13 39/18 40/9 42/14 68/25 78/16 92/3 consideration [8] 1/23 4/21 4/22 8/4 10/9 10/11 50/21 50/22 considerations [3] 9/1 11/4 13/5 considered [15] 3/24 7/6 7/20 8/25 10/21 28/13 30/11 31/11 37/9 41/22 70/5 80/18 80/25 96/5 146/14 consistent [1] 8/1 constantly [2] 120/9 122/19 constraints [2] 29/19 96/8 consultation [2] 33/4 33/13 consuming [2] 29/25 102/12 contact [3] 147/19 147/23 150/25 contacted [3] 30/2 36/14 36/21 contain [5] 21/19 22/25 25/8 113/10 114/5 content [3] 110/25	135/17 135/19 contents [2] 113/5 116/7 context [1] 151/20 continue [3] 52/17 110/12 147/25 continued [4] 1/3 1/4 160/3 160/5 continuing [1] 157/22 contract [4] 44/21 46/1 77/17 105/7 contracts [1] 106/8 contractual [4] 45/18 87/9 103/1 104/15 contradiction [1] 153/15 control [1] 110/2 convenient [1] 148/5 conversation [1] 156/21 conversations [1] 89/13 convey [1] 137/5 conveyed [1] 132/17 conviction [7] 2/18 3/7 3/11 3/16 3/21 4/6 5/9 coordinated [1] 91/6 copied [8] 64/5 72/12 72/15 77/3 88/7 103/5 142/18 143/13 copies [1] 116/10 copy [4] 72/22 92/7 102/14 116/18 copying [2] 139/7 141/7 Core [3] 110/8 110/24 135/23 corporation [4] 70/11 71/6 84/17 87/18 correct [6] 37/16 54/11 74/14 78/21 97/5 109/7 corrected [1] 53/5 correlate [1] 145/10 correspondence [1] 62/14 cost [1] 104/22 could [30] 15/1 15/19 18/6 19/8 30/21 31/16 36/15 36/17 38/1 40/2 44/11 50/23 59/12 64/23 65/9 73/16 78/16 82/15 82/18 89/20 94/15 94/18 98/17 104/2 110/3 110/23 132/6 133/12 139/19 155/1 couldn't [6] 13/16 34/9 46/18 50/8 73/15 101/5 counsel [34] 20/9 20/14 20/17 23/10	24/8 25/6 32/3 33/4 33/13 33/20 33/24 34/11 40/25 42/3 53/9 61/23 72/24 74/9 76/19 77/13 87/18 96/17 104/2 120/20 123/24 124/11 127/5 127/15 129/3 132/12 134/23 137/25 141/7 154/3 counsel's [4] 23/17 73/8 74/18 106/20 counsels's [1] 75/4 Count [1] 151/15 Count 1 [1] 151/15 country [2] 118/19 120/1 couple [4] 31/22 32/21 33/4 33/14 course [10] 17/21 19/24 50/17 82/22 96/18 96/19 98/16 109/17 121/20 150/18 courses [4] 54/2 59/3 59/6 113/21 court [65] 17/18 17/20 18/8 19/6 19/13 19/20 25/2 25/10 25/15 27/2 34/24 36/24 37/9 37/14 38/8 38/14 41/22 42/1 42/14 42/21 43/4 43/17 44/7 44/12 46/8 47/11 47/23 48/10 48/14 49/1 49/12 50/23 51/3 53/8 53/13 53/19 54/11 57/17 58/9 59/13 81/7 82/10 86/12 89/23 100/16 100/19 101/5 103/8 124/4 124/9 124/19 124/25 125/3 125/6 126/7 126/9 127/10 146/19 147/6 148/8 154/18 154/21 155/14 155/24 158/3 court's [4] 41/25 42/10 43/8 145/25 cover [4] 58/18 61/14 81/18 150/1 covering [2] 61/11 78/5 CPD [1] 12/20 CPIA [1] 113/17 CPS [2] 20/19 34/13 crimes [1] 1/17 criminal [19] 15/12 21/6 22/1 22/3 22/12 23/24 24/1 26/20 36/7 69/14 97/4 119/8 131/20 132/2 141/1 141/9 141/11 142/14 156/9 Critchlow [1] 126/12	critical [1] 129/16 criticisms [1] 91/15 cross [3] 47/16 67/12 82/6 cross-examined [2] 67/12 82/6 Crown [3] 8/20 126/7 148/7 currently [2] 107/6 129/22 custody [2] 31/21 31/21 cut [4] 30/4 94/10 95/19 130/12 cutting [1] 94/7
			D		
			daily [2] 24/23 26/11 data [18] 77/23 77/25 78/5 91/21 92/15 102/19 102/22 103/12 103/22 103/23 104/9 105/18 105/21 148/2 153/6 153/12 153/18 153/22 date [9] 24/21 48/3 48/4 86/16 120/10 120/21 121/14 148/7 148/19 dated [7] 57/15 64/9 67/5 112/12 128/9 151/11 153/2 dates [8] 47/17 49/23 123/23 155/17 156/16 156/17 157/5 157/18 Dave [2] 103/25 104/5 David [11] 36/21 50/13 89/10 95/14 95/16 99/5 101/24 105/3 106/16 108/2 139/8 day [12] 5/16 6/16 48/22 48/22 60/3 60/3 94/3 95/2 99/3 99/12 142/1 144/6 days [2] 89/7 126/5 deadline [5] 89/23 99/9 100/16 100/19 103/9 deal [23] 31/16 36/25 37/1 51/12 63/22 73/1 73/3 73/4 73/10 73/15 77/16 82/8 88/10 91/14 91/19 92/13 100/20 100/22 104/14 108/16 120/14 131/5 157/1 dealing [18] 7/8 7/24 34/11 36/1 40/4 53/1 54/17 55/10 74/19 75/2 98/24 103/6 105/7 106/7 114/14 121/11 143/9 156/7		

D	delivery [1] 91/7	72/9 79/22 80/15 84/6	disappear [1] 137/21	126/21 127/19 129/6
dealt [19] 10/22	dense [1] 81/8	84/10 84/12 84/15	discharge [1] 86/13	129/14 138/3 138/6
24/11 29/15 33/1	department [1] 74/11	88/6 95/10 97/21 98/4	discharged [1] 58/15	138/13 138/13 142/7
36/22 70/6 73/15	departments [1] 69/3	109/16 113/14 114/8	discharging [1] 86/6	142/21 143/5 143/19
74/21 75/2 89/4 103/4	depended [1] 32/10	115/3 116/23 118/21	disclosable [3]	143/25 144/1 145/4
110/19 115/22 118/15	depending [1] 117/9	119/12 119/19 120/19	133/22 137/17 150/17	148/9 148/25 149/2
119/3 120/19 140/21	depends [1] 9/11	121/8 124/25 125/7	disclose [8] 31/4	149/3 149/9 149/21
140/21 143/1	depth [3] 3/24 86/1	125/16 126/21 127/19	68/9 88/17 113/17	150/5 152/17 156/15
Dear [4] 89/12 93/5	88/3	128/21 130/18 130/23	127/9 143/20 143/21	157/3
95/16 99/5	dereliction [3]	131/4 131/9 132/5	143/24	document [18] 6/1
December [5] 1/1	121/19 122/2 129/6	132/17 137/18 141/11	disclosed [6] 18/2	6/8 6/18 12/7 12/10
49/21 49/22 64/10	described [1] 61/21	144/1 145/4 152/19	62/7 109/5 114/8	27/24 28/11 30/8 59/5
159/22	designate [1] 14/10	didn't [52] 4/18 14/4	134/3 140/6	75/24 102/1 124/4
decide [1] 116/25	designated [2] 14/11	15/21 19/5 26/23	disclosure [37]	124/8 128/12 132/25
decided [2] 13/24	14/20	28/21 30/13 30/20	65/19 67/25 69/1 73/2	136/9 136/11 147/21
141/16	designed [1] 115/16	30/22 31/10 31/24	73/21 74/6 74/10 75/9	documentary [2]
deciding [4] 1/23	desk [2] 61/8 104/13	34/1 34/2 35/1 40/25	76/1 76/20 77/14	30/19 34/20
3/18 9/2 114/21	desks [1] 105/25	41/7 42/7 44/22 45/23	77/16 85/7 85/16 86/7	documentation [1]
decision [9] 2/13	despite [4] 47/11	47/18 47/18 47/19	86/13 87/2 88/18 95/7	155/3
14/3 14/4 14/9 14/10	61/21 61/22 154/9	48/8 50/12 55/23 56/1	96/16 108/24 109/14	documents [14] 5/3
14/11 143/21 143/24	detail [18] 24/17	58/11 58/13 59/2	112/4 114/18 116/4	6/20 23/4 28/23 30/20
145/25	25/20 27/19 45/24	59/14 59/22 60/19	116/5 116/17 120/19	30/21 30/22 48/13
decisions [1] 143/19	63/22 79/21 86/1	61/19 62/10 68/21	121/7 132/14 132/19	68/19 71/3 116/10
declined [1] 118/25	88/11 91/12 92/10	68/23 73/12 80/6	132/24 133/2 133/20	116/19 117/8 145/5
defect [1] 57/17	96/12 98/10 142/8	87/13 88/4 124/24	137/15 153/21 154/8	does [15] 7/14 9/22
defence [81] 19/11	148/24 149/16 152/24	125/19 126/1 126/25	disclosures [1]	39/16 57/1 57/4 75/18
21/8 22/7 27/2 28/7	156/16 157/12	144/1 145/4 146/23	109/1	76/10 83/18 93/9
28/8 28/18 29/7 35/14	detailed [7] 16/9	150/5 151/9 155/7	discovery [1] 158/1	101/8 108/7 113/10
35/15 36/13 36/25	26/15 30/11 88/3	155/18 157/7	discrepancies [1]	113/11 134/17 135/23
37/2 38/2 40/1 43/10	133/13 139/25 154/8	difference [4] 82/23	139/20	doesn't [18] 5/7 8/22
44/13 51/2 53/21 58/8	details [14] 3/23 4/24	83/3 83/4 83/15	discuss [4] 57/16	38/20 50/18 50/19
59/13 62/24 63/7	20/4 20/22 21/20	differences [1] 83/16	78/14 78/20 149/8	61/3 70/16 75/17
65/21 66/2 66/24	66/17 85/10 92/1	different [15] 10/2	discussed [5] 7/1	76/10 76/24 83/17
68/15 71/16 71/20	139/22 139/24 140/11	37/20 54/17 54/25	80/17 102/6 146/12	83/19 88/23 90/5
73/2 73/22 77/11	147/18 147/23 150/25	69/18 82/20 84/2	148/2	101/7 101/11 101/13
78/12 78/19 80/4 80/7	deterrent [7] 1/16	85/11 86/21 106/6	discussing [4] 45/11	113/13
80/12 81/20 85/5	3/12 3/17 3/20 4/6 5/9	113/19 114/4 119/15	147/19 148/1 148/15	doing [17] 10/18
88/20 89/15 93/10	5/12	122/6 123/10	discussion [9] 54/19	11/14 23/17 24/2 39/1
96/16 97/15 103/19	detering [1] 1/21	differently [2] 39/8	54/24 127/6 136/10	42/17 53/25 63/18
117/14 117/18 118/9	developing [1] 135/7	41/13	148/11 149/23 149/25	49/16 70/18 70/20
118/11 123/24 126/6	dictated [1] 121/16	difficult [5] 38/24	150/1 150/3	75/7 79/4 86/8 128/23
126/8 126/13 126/14	did [115] 1/14 3/19	41/8 42/19 51/22	discussions [1] 53/7	138/11 141/20
127/8 133/16 134/4	7/10 7/16 7/18 10/4	156/14	disposing [1] 8/9	don't [196]
137/12 138/5 138/8	10/14 12/17 12/25	difficulty [1] 156/23	do [93] 1/18 2/2 2/20	done [33] 22/22
139/1 140/7 144/11	13/6 13/17 14/6 14/17	digest [1] 140/16	6/8 7/5 15/10 16/1	23/14 23/14 25/5
146/8 146/19 147/7	15/21 18/14 19/6 21/3	Dinsdale [6] 64/10	16/21 19/12 24/8	26/12 34/18 40/22
147/18 148/14 148/19	21/4 22/1 22/6 22/6	73/20 74/3 74/5 74/8	26/11 29/5 31/19	41/4 41/12 45/5 46/11
150/16 150/25 151/4	22/13 22/24 24/9	74/13	31/20 33/17 34/15	86/12 101/6 122/12
152/8 153/21 154/7	24/24 25/7 27/20	direct [2] 64/15 78/1	37/10 43/1 45/6 45/6	122/14 125/10 125/19
154/11 154/13 155/10	27/23 28/7 28/10	directed [6] 24/3	45/10 46/5 51/15 52/6	125/24 127/1 127/24
156/2 158/1 158/3	32/14 35/17 37/6	47/4 47/23 47/24 85/4	54/13 54/18 59/2	127/25 129/5 131/23
defence's [6] 55/11	37/13 37/14 37/24	126/9	59/22 60/19 62/2	135/2 140/23 141/15
71/17 74/6 81/21 85/7	38/10 38/19 38/21	direction [2] 152/15	62/19 68/17 68/21	142/12 146/3 146/5
133/10	39/13 39/17 39/20	152/19	68/23 74/1 78/3 79/8	147/1 147/24 154/9
defences [1] 2/24	40/9 40/13 41/6 41/24	directions [9] 46/9	80/2 81/1 82/23 83/5	159/6
defend [1] 151/6	42/10 42/14 42/21	46/15 48/14 49/21	83/16 85/3 85/18	down [49] 3/1 13/9
Defendant's [1]	46/19 47/14 48/2	69/15 124/2 131/17	87/16 95/20 100/5	23/22 31/20 32/7
91/14	48/16 48/21 49/7 50/1	152/11 152/11	101/1 101/3 101/5	33/20 36/12 54/16
defer [1] 110/13	53/12 53/20 54/8	directly [4] 54/23	101/10 102/22 105/11	57/20 59/5 64/9 66/6
definitive [2] 10/20	54/11 56/3 57/8 57/25	89/8 139/7 147/15	108/10 108/10 108/20	66/12 66/13 75/16
11/12	58/1 59/14 60/12	disagreement [8]	109/8 109/11 110/2	77/16 77/20 77/20
degree [1] 134/18	60/20 62/2 62/2 66/23	43/20 47/8 48/1 124/1	110/6 112/22 118/21	79/18 81/4 84/5 87/16
deleted [1] 95/6	68/17 68/21 68/23	124/18 128/3 128/16	121/18 122/14 124/22	89/9 89/12 90/4 92/23
	68/25 70/3 72/3 72/8	128/25	125/7 125/9 125/16	92/24 93/11 94/21

D	<p>down... [20] 96/19 97/25 101/22 103/17 112/11 112/23 112/24 122/11 123/1 128/2 128/8 129/4 129/9 129/20 135/1 139/17 142/5 147/8 147/10 157/19</p> <p>dozens [1] 118/22</p> <p>draft [12] 91/9 93/18 94/22 114/2 122/4 129/25 137/11 137/24 137/25 139/13 139/14 145/21</p> <p>drafting [3] 77/13 114/5 117/5</p> <p>drafts [3] 113/11 113/18 114/4</p> <p>dragging [1] 65/9</p> <p>drawing [1] 97/3</p> <p>due [6] 37/8 41/21 107/10 130/11 131/8 150/17</p> <p>Dunks' [1] 102/14</p> <p>duties [39] 15/9 15/13 17/7 17/13 17/17 17/19 18/5 18/14 19/13 25/10 26/7 26/8 27/21 30/6 34/16 34/18 34/18 34/23 36/6 48/25 49/12 51/4 53/8 53/13 58/11 58/14 58/20 59/9 61/16 69/1 75/9 76/20 85/16 85/24 87/3 121/19 126/22 127/20 129/7</p> <p>duty [16] 16/1 16/12 16/19 16/25 17/6 17/15 17/23 36/6 67/25 68/9 76/1 89/21 104/23 122/3 133/19 137/14</p>	<p>either [5] 34/17 58/11 68/19 98/1 149/6</p> <p>elaborate [1] 30/16</p> <p>elapsed [1] 104/12</p> <p>Eleanor [1] 66/9</p> <p>elements [4] 27/12 101/8 145/22 146/10</p> <p>else [12] 11/9 39/20 59/12 72/16 73/16 103/6 104/14 105/6 105/7 105/8 135/22 157/11</p> <p>email [52] 2/9 16/10 45/9 54/15 54/23 55/3 56/19 57/14 57/22 62/21 65/16 75/16 76/7 81/24 85/1 88/7 89/10 90/9 90/24 92/23 93/1 93/13 93/15 93/17 94/9 95/3 95/12 95/20 97/6 103/17 103/25 104/5 106/15 106/18 112/16 117/23 120/5 121/24 129/11 130/13 133/1 133/8 137/24 137/25 138/19 139/15 142/25 143/5 144/18 145/9 149/12 151/1</p> <p>emailing [1] 139/7</p> <p>emails [13] 58/24 59/18 61/22 64/17 97/1 103/2 112/25 113/3 117/25 118/22 123/6 130/1 142/18</p> <p>embarking [2] 24/5 26/15</p> <p>emphasised [1] 108/19</p> <p>empirical [1] 46/6</p> <p>employed [2] 22/20 82/6</p> <p>employee [6] 19/15 48/21 49/2 50/17 63/4 103/10</p> <p>employer [3] 35/7 49/4 50/17</p> <p>enable [1] 91/25</p> <p>enclose [1] 72/24</p> <p>enclosed [3] 99/7 116/16 117/8</p> <p>enclosing [1] 92/7</p> <p>end [11] 31/7 38/4 60/15 90/5 98/17 98/19 119/20 119/22 133/15 140/23 145/1</p> <p>engaged [1] 54/18</p> <p>enjoy [1] 141/22</p> <p>enjoyed [2] 42/25 49/8</p> <p>enough [1] 58/14</p> <p>enquiries [9] 29/7 29/12 31/13 67/9 70/11 70/12 70/17</p>	<p>86/9 96/11</p> <p>enquiry [2] 29/11 55/11</p> <p>ensure [11] 48/25 49/11 58/14 108/24 109/13 120/25 125/8 126/21 127/20 132/18 150/15</p> <p>enter [1] 80/19</p> <p>entirely [1] 55/15</p> <p>entirety [1] 8/2</p> <p>entitled [1] 159/8</p> <p>errant [1] 147/12</p> <p>error [11] 67/13 67/18 68/2 75/11 76/3 76/22 83/12 84/18 98/19 125/13 126/25</p> <p>errors [8] 68/12 69/5 78/2 83/17 83/20 110/1 129/18 132/15</p> <p>escalate [2] 29/25 36/22</p> <p>essential [2] 109/15 109/16</p> <p>essentially [7] 2/12 73/8 80/13 81/24 87/17 105/15 122/8</p> <p>estimate [1] 158/9</p> <p>et [7] 82/7 82/7 124/2 128/13 128/13 130/12 130/12</p> <p>et cetera [7] 82/7 82/7 124/2 128/13 128/13 130/12 130/12</p> <p>even [19] 17/9 21/8 39/22 44/21 46/3 60/12 72/3 72/12 85/21 86/23 94/21 101/7 102/9 118/18 119/25 125/23 134/21 140/25 150/11</p> <p>evening [1] 82/2</p> <p>event [3] 25/16 88/4 123/7</p> <p>eventing [1] 107/12</p> <p>events [2] 107/11 107/14</p> <p>eventually [1] 62/17</p> <p>ever [7] 1/14 43/24 57/1 68/25 72/7 97/21 97/25</p> <p>every [5] 7/20 12/20 65/10 65/11 115/7</p> <p>everybody [3] 122/17 146/15 146/24</p> <p>everyone [2] 102/5 110/16</p> <p>everything [8] 11/3 33/6 36/3 120/21 141/7 156/18 157/6 157/10</p> <p>evidence [44] 2/4 2/17 2/23 3/5 3/6 4/1 7/7 15/12 17/11 18/7</p>	<p>18/25 21/23 23/5 26/15 28/1 30/10 31/2 31/18 31/21 32/8 32/12 32/21 33/21 44/7 51/15 61/24 62/1 63/13 63/17 64/1 64/2 64/3 67/11 71/25 105/1 113/6 134/15 152/6 158/14 158/22 159/4 159/6 159/9 159/10</p> <p>evident [1] 91/17</p> <p>evidential [2] 7/21 8/8</p> <p>exactly [9] 32/25 59/2 110/21 121/17 122/25 127/7 138/21 148/24 149/14</p> <p>examination [1] 101/20</p> <p>examine [1] 81/14</p> <p>examined [2] 67/12 82/6</p> <p>examining [1] 1/12</p> <p>example [2] 27/25 28/12</p> <p>Excellent [1] 100/7</p> <p>exchange [1] 62/21</p> <p>exchanged [2] 132/25 133/1</p> <p>exchanges [5] 89/25 97/6 112/16 117/23 121/24</p> <p>executives [1] 42/6</p> <p>exercises [1] 26/4</p> <p>exist [1] 47/18</p> <p>existed [3] 14/24 44/23 113/15</p> <p>expand [1] 82/9</p> <p>expect [2] 105/5 139/23</p> <p>expected [1] 17/4</p> <p>expecting [1] 16/16</p> <p>experience [15] 16/4 20/5 20/15 20/23 21/7 21/21 23/13 24/7 34/13 39/21 40/25 43/16 43/23 128/19 157/2</p> <p>experienced [9] 20/18 23/24 26/24 34/11 42/3 66/19 89/18 141/3 141/8</p> <p>expert [190]</p> <p>expert's [16] 15/14 16/3 17/7 17/13 18/1 20/4 20/22 21/8 21/20 22/7 25/22 26/3 31/13 91/15 126/8 126/14</p> <p>expertise [12] 15/15 22/15 22/17 25/13 35/4 37/8 39/25 40/24 41/21 55/10 97/17 148/17</p>	<p>experts [15] 17/9 19/12 21/5 46/12 46/16 46/18 47/6 47/25 48/8 48/15 123/25 124/16 126/15 126/19 153/5</p> <p>experts' [3] 152/13 152/16 152/20</p> <p>explain [13] 50/3 58/4 59/18 63/19 66/1 84/13 85/9 86/7 86/11 87/2 125/20 150/12 150/13</p> <p>explained [3] 59/10 60/20 107/21</p> <p>explains [1] 59/17</p> <p>explicit [1] 16/20</p> <p>explored [1] 152/7</p> <p>express [1] 85/20</p> <p>expressed [4] 20/7 20/25 23/7 70/7</p> <p>extent [2] 22/15 123/3</p> <p>external [1] 40/19</p> <p>externally [1] 51/1</p> <p>extra [1] 95/4</p> <p>extracted [1] 140/1</p> <p>extracting [1] 91/25</p> <p>extracts [1] 24/25</p> <p>eye [1] 119/13</p> <p>eyes [2] 140/24 140/25</p>
E	<p>E92 [1] 6/21</p> <p>each [4] 12/20 48/15 71/4 116/7</p> <p>earlier [13] 32/5 53/2 81/25 90/1 90/6 103/18 104/7 106/18 107/21 121/25 127/21 144/18 153/21</p> <p>early [5] 141/21 152/22 153/22 155/19 156/21</p> <p>easier [1] 73/4</p> <p>easy [1] 38/25</p> <p>effect [5] 3/20 5/12 21/18 25/9 143/8</p> <p>effort [2] 143/8 143/19</p>	<p>enable [1] 91/25</p> <p>enclose [1] 72/24</p> <p>enclosed [3] 99/7 116/16 117/8</p> <p>enclosing [1] 92/7</p> <p>end [11] 31/7 38/4 60/15 90/5 98/17 98/19 119/20 119/22 133/15 140/23 145/1</p> <p>engaged [1] 54/18</p> <p>enjoy [1] 141/22</p> <p>enjoyed [2] 42/25 49/8</p> <p>enough [1] 58/14</p> <p>enquiries [9] 29/7 29/12 31/13 67/9 70/11 70/12 70/17</p>	<p>86/9 96/11</p> <p>enquiry [2] 29/11 55/11</p> <p>ensure [11] 48/25 49/11 58/14 108/24 109/13 120/25 125/8 126/21 127/20 132/18 150/15</p> <p>enter [1] 80/19</p> <p>entirely [1] 55/15</p> <p>entirety [1] 8/2</p> <p>entitled [1] 159/8</p> <p>errant [1] 147/12</p> <p>error [11] 67/13 67/18 68/2 75/11 76/3 76/22 83/12 84/18 98/19 125/13 126/25</p> <p>errors [8] 68/12 69/5 78/2 83/17 83/20 110/1 129/18 132/15</p> <p>escalate [2] 29/25 36/22</p> <p>essential [2] 109/15 109/16</p> <p>essentially [7] 2/12 73/8 80/13 81/24 87/17 105/15 122/8</p> <p>estimate [1] 158/9</p> <p>et [7] 82/7 82/7 124/2 128/13 128/13 130/12 130/12</p> <p>et cetera [7] 82/7 82/7 124/2 128/13 128/13 130/12 130/12</p> <p>even [19] 17/9 21/8 39/22 44/21 46/3 60/12 72/3 72/12 85/21 86/23 94/21 101/7 102/9 118/18 119/25 125/23 134/21 140/25 150/11</p> <p>evening [1] 82/2</p> <p>event [3] 25/16 88/4 123/7</p> <p>eventing [1] 107/12</p> <p>events [2] 107/11 107/14</p> <p>eventually [1] 62/17</p> <p>ever [7] 1/14 43/24 57/1 68/25 72/7 97/21 97/25</p> <p>every [5] 7/20 12/20 65/10 65/11 115/7</p> <p>everybody [3] 122/17 146/15 146/24</p> <p>everyone [2] 102/5 110/16</p> <p>everything [8] 11/3 33/6 36/3 120/21 141/7 156/18 157/6 157/10</p> <p>evidence [44] 2/4 2/17 2/23 3/5 3/6 4/1 7/7 15/12 17/11 18/7</p>	<p>face [1] 88/4</p> <p>fact [39] 3/25 4/19 7/23 8/12 28/4 31/20 31/21 32/8 32/21 33/3 33/12 33/15 33/19 35/13 41/10 42/9 43/2 43/19 49/14 51/16 57/2 58/16 58/17 58/19 60/14 61/11 61/20 61/22 76/8 88/12 100/20 120/12 120/20 121/9 128/23 138/6 138/19 143/2 146/5</p> <p>fact's [1] 33/21</p> <p>failed [2] 149/21 154/17</p> <p>failing [1] 139/25</p> <p>fairness [1] 117/15</p> <p>faithfully [1] 75/4</p> <p>Falkirk [6] 67/15 82/4 94/12 139/10 139/19 139/23</p> <p>falling [1] 68/19</p> <p>false [1] 66/21</p> <p>family [2] 11/1 11/8</p> <p>far [8] 20/10 37/5 53/4 53/17 88/14 109/3 117/24 145/14</p> <p>fault [1] 125/18</p>	

F	flood [1] 95/7	FUJ00152843 [1] 62/16	93/18 94/15 95/14	going [45] 2/13 8/7
feature [1] 97/6	focus [5] 47/1 49/14	FUJ00152887 [2] 71/12 75/15	99/6 106/19 113/4	10/16 15/17 15/18
February [30] 48/20	56/18 84/4 84/8	FUJ00152902 [1] 81/4	122/5 128/4 136/2	19/21 20/12 21/23
81/3 81/10 89/8 89/11	follow [5] 4/11 29/23	FUJ00152930 [2] 106/15 129/14	143/20 153/16 154/20	23/8 24/8 24/18 25/4
89/14 89/24 90/1 90/7	39/16 50/19 110/23	FUJ00152979 [1] 147/14	156/19	30/9 31/1 48/10 48/12
90/11 92/24 99/9	followed [2] 29/18	Fujitsu [90] 19/15	Gareth's [7] 71/17	56/7 62/19 64/7 68/18
106/14 108/15 129/13	30/15	28/5 29/15 30/2 36/20	71/21 81/12 81/18	71/3 72/13 74/10
133/7 133/8 139/4	following [7] 2/22	36/21 44/16 44/18	81/21 101/19 106/24	74/11 76/25 77/4 80/9
139/7 144/7 144/8	15/13 20/1 26/16 63/8	45/19 48/22 49/4 55/8	gathered [1] 159/2	92/7 92/10 93/25
144/15 146/14 147/9	66/9 81/18	55/18 57/24 58/7 63/5	gave [5] 44/7 46/15	95/24 100/23 102/12
147/14 151/11 151/12	follows [6] 28/10	63/17 67/10 67/19	55/25 134/15 148/23	106/2 108/16 114/1
153/23 156/19 157/7	30/18 34/25 38/20	67/20 68/1 68/7 68/18	Gazette [1] 50/9	136/7 136/8 140/7
February 2010 [1] 153/23	50/18 130/5	69/2 69/20 70/11	general [8] 1/12 3/24	149/8 149/16 152/25
feed [1] 74/4	foot [4] 66/7 89/10	71/14 71/15 71/25	4/16 21/14 23/8 23/20	157/7 158/16 159/1
feel [3] 35/17 102/2	112/12 114/11	75/10 75/17 76/2 76/8	25/18 45/24	gone [8] 4/10 13/12
119/1	forensic [1] 103/21	76/21 78/13 78/20	generality [1] 27/18	23/25 69/13 104/13
feels [1] 78/2	forget [1] 53/23	79/8 79/11 80/11	generally [9] 5/16	135/5 136/17 141/5
felt [1] 120/11	form [10] 28/13 30/9	80/18 82/3 82/6 82/17	11/14 16/18 22/5 50/1	good [11] 1/5 1/9
few [4] 10/16 43/22	31/5 63/4 97/24 97/25	83/19 83/23 84/17	85/18 131/11 154/25	1/10 1/10 37/18 52/17
50/6 89/7	115/16 144/22 145/5	84/21 87/7 87/11	157/16	60/4 100/13 111/2
Fifthly [1] 16/25	146/8	87/23 88/17 91/14	gentlemen [1] 43/14	111/12 111/16
figure [4] 9/14 9/17	formed [1] 28/1	91/24 92/6 94/17	gentlemen [1] 149/5	got [49] 5/3 6/9 6/12
9/18 9/18	formulated [1] 51/7	95/13 95/24 96/2	gentlemens [1] 145/11	6/14 7/15 12/5 23/10
file [8] 2/15 118/2	forthcoming [2] 117/12 154/10	96/20 96/20 97/17	get [25] 12/20 40/18	23/15 25/20 25/21
118/3 119/11 120/5	forward [14] 13/20	98/1 98/5 98/11 99/4	42/7 45/12 46/8 50/2	29/21 29/23 34/10
126/18 131/15 134/20	28/4 29/9 29/11 31/15	102/16 103/9 107/4	62/1 99/6 99/22 100/4	41/5 41/14 45/6 45/6
files [7] 3/23 18/15	36/25 44/9 55/23	108/1 113/4 117/11	108/7 108/20 115/8	45/7 45/14 52/20
91/25 101/20 142/20	65/24 78/24 80/3 89/7	118/23 129/12 129/18	115/9 116/10 136/20	60/13 60/22 61/6
142/21 142/22	95/23 133/16	129/21 131/10 132/14	143/5 145/11 146/15	69/15 69/20 70/4 71/3
final [2] 109/1 109/8	forwarded [2] 80/13	133/1 133/1 134/2	148/20 149/7 150/9	74/18 84/7 85/10 87/9
finally [2] 108/20	130/15	136/2 137/20 140/4	150/11 151/19 158/5	97/15 105/5 105/8
115/11	forwarding [2] 28/19	147/22 153/3 153/7	getting [4] 87/11 91/2	108/11 116/13 120/2
financial [1] 69/7	93/16	153/12 153/17 154/20	129/17 136/1	120/3 120/4 127/15
find [9] 44/5 46/18	forwards [3] 65/6	155/9	give [17] 10/20 11/11	131/14 132/22 140/25
49/18 51/13 58/24	100/24 108/16	Fujitsu's [1] 29/22	21/23 28/2 31/18 46/9	141/1 144/23 145/6
66/8 82/2 139/24	found [6] 68/2 68/12	full [8] 3/23 11/23	70/24 87/5 88/3 88/11	148/5 152/14 158/4
140/8	75/11 76/3 132/16	12/1 67/21 126/8	89/18 95/22 96/4 98/2	Gourlay [5] 2/14 2/18
fine [4] 47/3 100/8	139/18	126/13 132/22 133/24	138/16 158/14 159/3	3/7 3/9 3/13
137/9 159/18	four [4] 81/19 93/21	function [2] 19/12	given [19] 7/13 24/13	grateful [5] 52/10
finished [2] 15/16	119/25 145/8	115/3	30/1 49/21 55/24 88/2	72/25 89/19 133/11
39/17	fourth [3] 12/3 52/25	functional [1] 49/9	132/9 132/12 140/15	148/3
finishing [1] 110/5	53/3	fundamental [1] 98/5	144/16 147/17 152/6	grind [1] 74/11
first [21] 8/7 15/24	Fourthly [1] 16/19	Furnival [1] 151/13	152/12 152/16 152/19	GRO [1] 115/19
21/7 28/25 43/23	frank [2] 11/23 12/1	further [22] 29/11	155/2 155/12 155/21	grounds [1] 151/16
50/22 62/16 77/10	Friday [11] 1/1 99/10	29/12 34/4 50/10	158/22	guidance [7] 12/6
83/21 91/9 93/18	99/15 100/1 100/5	54/16 62/12 67/9	gives [1] 7/13	16/20 64/18 65/5
95/17 114/21 123/14	100/15 100/25 101/15	77/15 81/8 89/5 90/4	giving [5] 17/11 31/1	65/14 69/15 87/5
124/24 128/19 131/21	103/8 105/13 106/16	92/25 93/11 95/7	93/17 93/20 124/13	guidelines [1] 14/25
135/4 141/4 142/1	106/16	124/2 130/15 131/9	glance [1] 95/17	Guildford [3] 126/7
157/2	front [3] 89/6 100/22	145/18 148/2 158/17	go [34] 6/12 13/5	126/10 148/7
firstly [7] 3/22 15/13	132/23	159/4 159/9	25/22 41/19 66/23	guilt [1] 11/19
20/4 26/16 68/10 92/6	fronts [1] 70/12	G	67/7 69/16 69/19	guy [1] 19/14
121/9	FUJ00122713 [1] 89/9	Gareth [31] 36/24	71/12 72/18 75/15	guy's [1] 148/16
five [4] 78/5 134/7	FUJ00122723 [1] 130/2	55/7 55/18 55/19	77/8 77/9 77/10 101/4	
135/13 136/8	FUJ00122729 [1] 95/11	57/23 59/19 59/20	103/16 106/14 108/12	H
five years [1] 78/5	FUJ00122731 [1] 99/2	82/8 82/15 84/1 88/5	109/13 111/4 113/8	habit [1] 100/21
fixed [1] 123/22	FUJ00122735 [1] 101/15	88/9 88/10 91/3 91/5	116/24 117/1 117/6	had [110] 6/22 8/6
fixture [1] 123/21	FUJ00122808 [1] 139/6	91/10 91/19 93/6	119/2 120/2 123/14	11/6 12/11 13/12
flag [1] 107/19			128/7 128/7 128/11	13/21 16/7 17/1 17/11
Flemington [2] 54/20			145/12 150/14 151/11	17/17 17/19 21/8
57/15			151/13	21/19 22/5 22/10
flesh [2] 1/18 89/2			goes [1] 108/24	22/10 23/2 23/4 23/9
				23/16 25/9 26/4 26/7
				28/13 28/18 30/11

H	149/18 155/11	119/2 119/15 120/4	54/7 63/14 80/23	I attended [2] 54/2
had... [84] 33/2 34/11	hasn't [7] 12/5 86/12	120/6 127/15 139/15	106/3 118/6 131/13	59/3
36/3 36/8 39/17 39/20	92/15 94/9 94/21	145/12 147/24 156/5	hope [1] 65/13	I been [1] 58/24
40/13 42/25 43/24	97/19 115/8	157/9 157/18	hoped [1] 110/22	I believe [1] 14/13
46/9 50/5 53/6 54/3	hat [1] 86/24	Here's [1] 74/12	Horizon [55] 19/9	I believed [1] 61/4
56/3 62/6 64/15 67/13	have [197]	hereafter [1] 158/8	29/9 35/16 37/4 39/19	I can [25] 1/19 6/15
67/14 68/12 70/4	haven't [13] 33/5	Herewith [2] 93/6	48/23 51/12 55/10	6/19 15/6 20/10 35/16
70/22 73/20 73/24	33/7 62/6 70/16 85/9	133/10	57/17 60/21 63/1 63/2	37/5 52/5 52/6 53/4
73/25 75/8 82/20	96/2 96/11 98/6	highlighted [6] 57/21	65/10 66/19 67/14	58/5 79/20 79/23 80/1
84/23 85/8 86/16	108/11 131/14 132/22	62/25 69/9 69/11 84/9	67/18 68/2 68/12 69/6	86/25 100/20 106/3
86/22 86/23 89/25	143/15 143/16	136/12	69/21 75/11 76/3	108/12 109/10 137/3
90/13 94/8 96/11 97/9	having [5] 2/15	highlighting [1]	76/22 77/21 77/23	137/10 140/19 142/12
97/23 102/22 104/12	115/11 123/8 137/5	101/1	78/7 82/17 83/12	149/20 157/16
105/22 105/25 110/8	152/15	him [66] 5/13 19/5	83/17 83/18 84/18	I can't [94] 7/16
113/15 116/6 116/24	he [178]	27/25 28/9 28/20	87/19 89/16 94/17	10/20 11/11 12/23
117/20 120/1 121/13	he'd [3] 146/15 155/2	28/22 28/23 30/8	96/1 97/11 97/16	13/10 15/5 24/17
121/13 122/15 123/22	155/4	30/25 31/17 33/15	97/18 98/12 103/21	32/17 32/25 32/25
126/6 129/12 131/24	he'll [1] 158/18	34/16 34/17 37/6 37/9	103/23 104/9 107/4	33/23 42/12 42/23
132/2 132/12 132/16	he's [23] 4/25 42/8	37/13 38/10 38/19	108/5 109/22 109/24	46/2 52/6 54/7 57/11
137/5 137/19 138/3	42/8 43/2 50/16 56/24	38/22 39/13 39/18	129/19 130/21 131/1	58/4 60/12 62/11
138/12 140/23 141/9	70/15 70/15 88/9	40/9 40/13 41/16	132/6 132/15 138/24	63/14 63/19 63/20
142/20 142/21 143/14	90/16 92/7 94/7 105/4	41/22 42/11 42/14	140/6 152/5 153/4	63/21 63/23 66/4 67/1
143/20 144/16 145/20	105/5 115/14 115/15	42/21 43/3 43/4 44/1	Hosi [1] 66/15	68/22 68/23 69/8
149/13 151/2 152/19	128/22 129/22 143/13	44/3 47/11 53/10	house [1] 45/22	69/17 70/2 70/17
152/19 153/6 153/11	146/16 146/17 148/18	54/24 55/13 55/24	how [38] 1/18 7/12	70/24 70/24 72/14
153/12 153/17 154/17	158/14	56/2 56/4 56/4 58/20	12/8 13/15 13/17	72/16 73/18 74/22
154/19 155/18 155/21	head [23] 14/14 24/1	61/19 61/21 61/23	13/21 27/3 27/5 29/6	77/5 77/6 79/24 83/1
155/23 156/8 157/11	30/1 36/21 49/3 50/4	64/16 74/20 90/16	30/3 33/1 33/23 34/8	83/14 84/9 84/13 85/9
hadn't [2] 104/11	50/7 51/23 69/14	92/13 96/17 97/3	43/1 61/21 62/19 65/5	85/12 85/13 85/20
153/23	86/23 86/24 92/5 98/1	105/15 115/9 115/10	69/11 69/16 70/18	85/23 86/14 86/18
Hadrill [2] 151/13	119/8 129/12 131/19	122/19 123/8 144/21	70/20 73/11 78/3	87/12 87/14 88/3
152/2	132/2 137/7 140/25	148/20 148/25 149/2	84/15 85/18 87/10	88/11 88/24 89/4 90/2
Hadrill's [1] 123/23	141/9 141/11 142/13	149/2 150/9 150/12	99/23 110/2 114/8	93/23 96/4 96/13
halt [1] 74/12	156/9	154/21 155/13 155/23	114/16 116/23 121/17	97/12 97/20 98/2 98/2
hand [11] 57/11	heads [1] 136/1	158/17	140/21 142/24 148/10	98/9 98/10 100/3
74/21 75/22 75/23	health [4] 9/25 10/24	himself [3] 52/9 70/8	149/22 150/22 157/16	103/10 108/14 108/17
76/7 83/5 83/5 83/6	10/25 11/7	83/8	Howe [1] 136/2	113/20 113/22 113/22
116/5 126/17 127/3	hear [6] 1/5 5/22	hindsight [1] 82/24	however [3] 6/19	118/19 122/24 125/20
hands [2] 106/11	52/18 83/14 111/12	his [46] 16/14 19/12	38/5 139/23	129/1 131/3 132/11
114/3	137/2	21/13 25/16 25/25	HR [1] 14/13	132/21 138/1 138/14
Hang [1] 135/6	heard [1] 126/11	28/14 30/9 30/12	Hudgells [1] 136/2	139/5 140/9 144/2
happen [3] 102/13	hearing [10] 81/7	34/16 34/18 35/4 35/4	huge [2] 64/23	145/3 145/16 145/18
115/25 151/9	95/23 103/19 124/12	35/7 37/3 37/8 39/25	107/19	146/20 149/17 151/7
happened [4] 62/8	124/14 126/10 154/6	41/21 43/5 48/25 49/4	Hugh [1] 57/15	I cannot [3] 53/7
105/22 124/14 151/8	154/13 154/18 159/21	49/12 53/8 61/24 62/1		125/17 140/10
happening [2] 80/7	heart [1] 57/11	63/3 65/24 72/4 72/5	I	I certainly [3] 7/12
157/6	heavily [2] 20/8	74/5 77/13 77/24	I accept [2] 4/19	12/12 125/5
happens [1] 107/11	20/14	82/15 89/22 91/5	122/12	I confirm [1] 76/16
happy [4] 79/8 102/1	held [1] 68/10	94/15 94/22 95/3 97/3	I actually [1] 121/16	I contacted [2] 30/2
115/14 115/15	help [18] 14/22 15/6	113/5 113/11 143/14	I advised [1] 2/1	36/14
hard [2] 98/21 141/21	54/12 63/11 63/14	144/7 144/21 148/17	I agree [6] 6/6 18/13	I continue [1] 110/12
Harry [1] 54/21	63/23 65/13 75/21	157/25 158/19	76/16 99/17 100/6	I could [1] 15/19
has [37] 5/24 28/24	79/24 80/23 90/17	history [3] 61/17	129/4	I couldn't [2] 13/16
42/18 52/20 53/15	90/17 91/5 92/7 96/13	103/16 152/1	I also [1] 36/20	34/9
62/25 63/1 63/2 68/2	101/6 154/7 156/2	HJA [1] 136/5	I always [2] 10/23	I cover [1] 61/14
70/7 71/3 71/16 75/11	her [5] 2/19 3/13	Hogg [4] 77/12	33/1	I dealt [2] 10/22
76/3 76/19 78/7 79/7	16/14 25/16 137/12	133/18 137/12 138/20	I am [9] 30/4 54/4	115/22
81/11 81/20 85/4	here [33] 4/20 41/6	hold [7] 5/24 33/7	95/8 96/13 130/9	I did [14] 7/16 15/21
86/12 87/20 88/18	41/8 44/25 53/1 54/17	45/7 46/24 82/3 121/3	138/9 139/21 141/10	21/4 22/6 22/6 37/24
89/17 92/2 102/6	60/14 63/24 70/8	128/21	148/25	39/13 46/19 50/1 54/8
110/16 115/7 118/23	79/17 80/7 80/10 87/7	honest [8] 4/9 10/16	I anticipate [1] 68/5	60/12 68/21 79/22
127/11 135/5 137/15	87/17 95/24 106/7	32/24 84/7 90/14	I arranged [1] 78/23	80/15
140/6 142/12 148/4	107/24 110/1 113/9	113/20 134/22 149/15	I asked [1] 95/4	I didn't [21] 28/21
	115/12 116/10 117/10	honestly [7] 53/16	I attach [1] 62/24	30/13 30/22 34/1 34/2

I	50/18 55/23 57/3 57/11 58/4 61/25 62/3 63/19 63/20 68/21 69/16 70/2 70/20 72/3 72/14 73/14 73/18 73/19 74/15 74/22 75/6 79/3 79/18 79/19 80/18 80/21 85/11 85/25 86/2 87/8 88/13 89/3 90/2 90/20 96/4 96/10 98/6 98/7 100/23 104/18 106/7 108/9 108/11 108/13 108/22 115/20 124/11 127/23 131/13 131/21 132/21 140/18 141/14 141/18 143/23 144/24 144/25 145/12 146/20 146/22 149/8 150/10 150/21 152/23 152/23 155/25 157/13	I spoke [1] 50/11 I started [1] 34/7 I take [2] 80/5 125/18 I tell [1] 100/1 I think [163] I thought [1] 156/17 I took [2] 72/4 132/1 I understand [3] 37/3 51/18 89/17 I visualised [1] 40/17 I was [38] 10/3 15/4 22/19 22/21 23/8 24/18 25/4 30/1 35/24 36/16 36/18 39/6 40/23 41/9 43/24 45/16 46/5 53/17 78/23 112/16 113/2 118/17 119/18 119/24 127/23 129/1 131/3 131/15 132/4 135/16 135/18 140/12 142/1 142/2 143/4 147/21 156/6 157/13 I wasn't [8] 35/18 42/1 46/3 107/23 118/18 119/25 135/15 143/9 I went [1] 50/10 I will [4] 52/3 134/16 135/13 159/10 I wonder [1] 110/3 I would [43] 3/23 4/11 12/22 21/1 22/9 22/22 23/12 23/14 23/21 23/25 24/3 24/20 24/22 24/23 25/5 25/5 25/19 25/21 25/24 26/11 36/3 42/19 44/3 45/24 46/21 50/20 53/9 54/1 67/9 69/14 71/19 85/25 86/16 89/19 91/10 110/11 113/20 113/21 131/16 131/24 133/11 138/15 142/7 I wouldn't [6] 5/17 9/11 24/16 45/23 79/4 131/22 I'd [7] 23/15 47/1 53/24 110/10 110/22 141/15 148/3 I'll [3] 6/3 6/22 147/13 I'm [94] 2/13 4/4 4/4 6/1 6/11 7/4 13/24 14/17 15/2 18/17 19/7 20/20 21/16 22/18 24/2 27/16 28/16 30/23 32/1 32/18 35/3 35/19 39/1 39/2 39/3 39/5 40/12 44/19 44/20 47/15 47/16 47/16 47/17 47/20 48/11 51/9 51/23 52/10 52/20 54/6	59/17 60/8 61/1 62/18 69/18 69/19 72/14 74/19 74/24 75/2 75/6 77/3 77/5 79/19 80/3 84/3 85/20 88/8 92/24 98/23 98/25 100/2 100/2 100/4 100/19 100/21 100/25 102/1 103/4 104/21 104/23 105/10 105/12 105/22 106/13 110/21 120/24 127/22 130/8 136/1 136/7 136/8 137/25 140/7 140/15 141/6 142/6 142/9 146/3 151/7 156/3 156/11 159/4 159/13 I've [55] 10/17 11/14 18/18 21/4 21/7 22/10 23/14 26/2 26/21 28/22 35/22 37/17 37/20 43/21 43/22 43/24 45/15 51/24 53/24 53/24 53/25 59/18 60/11 60/13 62/3 63/21 64/13 64/15 69/2 72/7 74/18 87/15 90/16 90/16 93/21 101/25 106/5 110/8 110/9 113/21 118/22 120/4 129/20 134/20 138/10 140/23 140/23 141/19 141/20 141/20 142/3 142/4 142/6 158/4 158/21 idea [2] 58/16 99/12 identified [5] 22/16 89/17 154/19 155/19 156/20 ie [9] 11/6 18/8 39/17 69/3 95/14 112/3 112/15 127/16 130/3 ie after [1] 39/17 ie David [1] 95/14 ie looking [1] 69/3 ie the [3] 112/3 112/15 127/16 ie these [1] 18/8 ie to [1] 130/3 ie whether [1] 11/6 if [130] 2/9 2/10 2/24 6/3 6/17 8/19 9/15 9/23 10/6 15/21 16/2 18/2 22/20 23/8 24/18 25/3 30/17 31/14 32/20 35/16 36/1 36/11 37/22 38/19 43/9 44/2 44/4 46/22 47/1 48/7 51/8 51/19 53/11 54/15 56/3 57/20 57/21 57/25 58/5 60/10 60/10 64/9 65/15 66/6 66/11 66/12 67/7 67/18	68/14 70/4 70/22 72/5 72/25 75/15 77/9 79/18 79/23 81/4 82/18 82/25 83/2 84/20 85/21 89/9 89/12 89/20 90/9 90/19 91/11 92/22 93/11 93/25 94/2 94/18 95/1 95/12 98/11 98/18 98/25 99/13 99/17 99/20 99/24 99/25 101/15 101/22 102/2 103/17 104/5 104/20 104/20 111/5 111/22 112/11 112/11 112/19 112/20 112/20 113/8 115/8 115/14 115/14 117/12 118/11 120/14 120/15 123/12 123/13 123/19 123/19 127/8 128/7 128/11 129/13 130/2 130/14 133/11 134/8 134/14 135/19 139/17 139/18 140/3 147/10 148/3 150/11 151/11 151/13 151/19 151/25 immediately [1] 71/21 impermissible [1] 9/10 implication [1] 65/23 implicitly [1] 3/13 implied [1] 70/14 importance [1] 86/9 important [5] 12/4 49/8 49/11 68/6 108/18 importantly [1] 150/2 inbox [1] 120/5 incident [2] 35/21 35/24 incidentally [1] 55/9 include [10] 5/7 5/10 20/22 22/14 24/11 24/25 75/17 76/10 91/24 122/3 included [8] 25/25 26/18 27/12 113/6 117/24 121/7 121/21 152/12 including [5] 16/8 19/2 31/5 41/11 66/15 inclusions [1] 19/25 incorporate [1] 101/7 incorporated [2] 145/21 146/10 incrimination [2] 134/16 136/14 indeed [2] 88/2 130/15 independence [1] 49/9 independent [8]
----------	---	--	---	---

I	55/19 56/2 56/3 56/4 56/12 56/25 57/6 57/23 58/1 59/1 59/19 59/20 60/15 78/24 78/25 79/15 123/8 149/24 152/7 154/21 155/4	Investigator [8] 63/11 63/16 63/25 72/22 73/9 79/2 117/21 144/9 investigatory [1] 117/20 involved [11] 8/13 9/5 9/6 9/9 77/1 87/9 89/8 90/13 147/1 156/5 157/11 involvement [4] 53/6 62/15 149/10 149/11 involving [2] 62/22 128/17 is [229] ish [1] 144/14 isn't [20] 12/2 33/21 37/15 37/17 55/19 56/24 58/10 72/14 76/17 82/21 83/10 84/5 94/25 98/22 110/10 115/17 128/22 135/1 137/22 140/7 issue [19] 7/11 10/15 12/8 14/23 25/17 43/8 71/2 82/9 87/19 96/25 97/9 107/12 111/17 111/22 123/2 123/10 129/16 132/6 153/20 issued [3] 15/1 48/10 48/14 issues [31] 1/12 10/1 16/15 37/2 43/13 51/12 69/21 71/7 71/8 71/23 78/14 78/21 85/5 93/21 104/1 104/3 106/21 106/23 106/24 107/3 107/10 109/24 129/19 130/11 130/20 131/9 139/18 145/8 147/20 150/1 158/18 issuing [3] 7/3 10/8 11/24 issy [4] 77/12 133/18 137/12 138/20 issy Hogg [4] 77/12 133/18 137/12 138/20 it [441] it's [154] 2/11 2/11 2/12 3/15 3/22 4/10 4/19 4/20 4/20 4/22 4/23 5/2 5/13 5/14 5/18 7/5 7/13 7/21 8/19 10/9 11/12 12/4 12/4 12/4 12/5 12/9 12/19 13/15 13/16 13/17 15/3 15/3 19/16 20/8 23/12 23/18 24/21 24/22 26/11 26/12 26/25 28/16 31/2 32/17 34/20 38/23 38/24 39/7 43/21 46/8 51/22	53/14 54/24 54/25 56/5 56/5 56/5 56/17 56/22 57/12 58/3 59/24 59/25 60/3 60/9 61/3 61/7 63/19 64/2 66/6 68/22 72/21 74/10 74/11 74/17 74/20 74/21 75/2 76/15 78/22 80/16 81/2 81/4 84/5 85/11 86/21 98/21 100/24 102/3 102/24 104/13 104/14 104/15 104/18 104/18 105/2 106/2 106/4 106/6 106/8 108/18 110/2 110/21 112/12 115/11 115/15 117/12 118/2 118/11 120/4 120/5 120/12 121/18 122/11 122/24 123/13 123/14 125/17 127/22 127/23 128/9 129/4 129/15 134/6 134/8 135/2 136/17 137/24 138/9 138/11 138/11 138/15 139/4 140/10 140/22 141/2 141/4 141/14 141/18 141/23 143/10 143/23 145/23 146/2 146/2 146/17 146/23 147/3 148/22 151/4 151/14 156/13 156/14 157/9 items [2] 112/21 127/9 its [8] 86/6 86/13 88/17 97/24 97/24 132/14 132/19 155/12 itself [9] 26/25 39/24 59/16 68/18 69/1 69/3 86/10 146/16 148/21	58/17 59/1 59/9 59/20 59/21 61/9 70/13 71/7 84/2 85/4 88/5 88/10 88/20 89/17 89/21 91/3 92/6 93/6 93/18 94/9 94/22 95/4 95/5 95/15 96/25 97/2 97/9 98/1 99/4 99/6 100/16 101/22 102/16 105/15 107/6 113/4 122/5 123/4 124/5 124/9 124/20 124/25 125/4 126/18 127/11 127/16 128/4 128/22 129/21 130/3 130/18 130/24 133/24 134/2 134/24 137/19 139/6 143/20 144/17 144/23 145/6 145/20 147/15 148/10 149/12 149/22 150/15 151/1 153/16 154/20 154/25 154/25 155/18 155/21 156/19 157/24 Jenkins' [11] 40/5 62/15 62/18 64/1 92/8 101/17 136/3 139/14 144/6 147/23 150/25 job [1] 80/25 John [2] 4/15 93/5 John Scott [1] 4/15 joint [3] 43/14 43/20 128/2 Jon [12] 64/19 74/13 78/11 79/6 81/5 84/25 93/2 133/9 133/11 144/9 144/18 145/9 Jon Longman [6] 74/13 81/5 133/9 144/9 144/18 145/9 Jones [17] 36/21 89/11 89/12 90/10 92/5 95/14 99/4 101/16 103/5 106/16 108/2 129/11 130/4 131/10 134/2 139/8 156/21 Jones' [6] 50/13 90/22 93/13 93/15 93/17 93/20 judge [9] 43/10 46/9 46/14 47/4 81/7 123/21 123/24 124/16 126/12 judgment [1] 67/11 Juliet [2] 50/6 142/17 July [5] 57/16 103/19 127/3 127/19 152/11 July 2010 [1] 127/19 just [80] 2/9 3/1 4/7 5/20 5/24 6/19 9/24 10/3 15/3 15/3 18/9 19/18 20/16 26/2 26/21 27/13 29/25 30/4 31/12 33/10
		J		
		Jane [1] 62/23 January [3] 67/5 71/13 77/11 JARNAIL [7] 1/3 44/3 45/5 90/23 94/4 106/17 160/3 Jenkins [122] 19/22 26/18 27/10 27/20 27/23 28/11 30/3 30/6 30/24 31/1 32/4 33/3 33/14 34/5 34/22 36/24 37/24 38/14 40/19 41/25 42/24 43/11 46/17 47/8 47/18 47/19 48/2 48/16 48/19 48/19 48/21 50/14 51/14 51/16 53/6 53/11 54/10 55/8 55/18 55/20 56/15 56/20 57/6 57/24 57/25 58/2		

J	133/21 137/16 last [9] 6/21 41/20 43/22 74/2 77/9 128/8 142/11 151/12 153/9 Lastly [1] 25/7 later [8] 6/16 39/16 48/11 99/3 113/9 114/1 126/5 143/6 law [31] 12/12 12/17 12/19 21/17 22/13 22/24 23/24 24/1 24/9 24/25 25/8 26/20 36/5 36/8 50/9 51/5 60/17 63/21 69/14 97/5 113/15 119/8 131/20 132/2 141/1 141/9 141/11 142/14 156/10 157/1 157/10 lawyer [18] 60/5 98/23 106/10 112/7 114/13 115/1 115/3 115/13 115/18 115/21 115/24 116/3 116/6 116/23 117/22 118/21 142/15 142/16 lawyers [4] 12/8 23/24 105/6 118/16 lay [5] 37/4 38/1 40/7 43/18 128/22 laziness [1] 59/25 lazy [1] 60/2 lead [1] 95/6 leading [1] 50/7 least [9] 37/7 37/14 108/22 108/25 109/12 125/1 132/20 145/19 150/20 leave [3] 5/11 89/22 120/2 Lee [1] 57/17 left [14] 1/11 11/13 11/13 15/5 33/6 62/9 75/22 75/23 83/5 83/6 83/9 121/12 129/10 138/10 left-hand [3] 75/22 75/23 83/6 left-hand/right-hand [1] 83/5 legal [11] 14/1 30/1 36/21 42/6 45/21 49/3 50/4 65/7 92/5 112/9 129/12 legislation [1] 86/17 less [10] 31/12 43/7 120/10 122/20 148/18 156/18 157/5 157/12 157/14 157/15 let [9] 39/5 39/5 39/7 46/23 46/25 50/1 52/8 93/7 156/5 let's [14] 47/20 52/7 57/14 66/23 71/2 72/18 75/20 83/5	95/10 99/19 103/16 106/14 114/16 139/6 letter [6] 16/9 77/9 79/11 105/4 153/2 153/5 level [3] 9/8 24/21 40/2 liaison [2] 113/3 159/7 life [3] 45/13 141/22 142/9 light [1] 7/9 like [30] 2/24 22/5 23/13 24/16 28/16 28/20 31/14 31/17 35/20 42/7 44/22 45/13 50/22 51/2 54/13 56/11 58/7 60/4 63/17 72/5 80/2 82/8 88/23 90/10 91/1 91/10 98/25 104/20 106/4 143/10 likely [1] 135/20 limit [1] 135/13 limitation [2] 135/11 135/12 limitations [1] 22/16 limited [9] 37/3 91/8 91/16 91/18 91/20 102/2 107/14 135/19 135/20 line [9] 52/25 53/3 74/2 74/2 101/25 111/6 120/15 121/10 129/3 list [3] 117/3 117/7 133/13 listed [12] 26/2 26/21 27/13 114/22 117/17 118/4 120/6 122/18 126/6 126/16 152/10 154/11 literally [2] 35/13 136/8 literature [2] 17/24 25/1 little [10] 1/19 3/1 79/18 89/2 90/4 130/14 139/17 142/2 143/6 147/11 living [1] 17/10 locking [3] 107/10 130/11 131/9 log [2] 91/25 101/20 logs [10] 39/23 102/5 102/7 102/10 106/22 107/12 107/13 107/16 127/13 140/1 long [22] 3/22 5/14 11/12 13/6 13/16 15/4 34/2 42/18 51/11 51/25 53/14 53/25 63/20 80/16 85/9 102/10 118/18 118/18	119/24 119/24 122/24 138/9 longer [1] 110/22 Longman [29] 62/22 64/19 71/14 71/24 72/22 74/4 74/13 75/5 75/16 78/11 78/18 79/6 81/5 90/8 93/2 93/12 93/17 94/8 94/20 95/3 95/13 103/18 104/7 114/12 133/9 137/22 144/9 144/18 145/9 Longman's [5] 85/1 94/2 95/10 95/20 115/19 look [48] 2/8 2/9 2/25 24/2 31/1 36/10 46/19 48/12 54/14 57/14 64/8 65/24 66/6 74/18 74/20 75/1 75/20 75/23 76/7 81/1 85/25 86/22 89/1 90/22 92/8 92/22 94/2 95/4 95/23 99/11 101/5 101/15 104/5 104/25 112/11 112/19 118/22 120/3 122/21 123/9 123/12 123/19 129/25 130/2 133/7 138/18 139/13 151/20 looked [10] 8/24 50/9 59/19 64/21 90/1 90/6 93/13 103/3 117/24 120/13 looking [19] 2/6 51/11 56/9 63/22 64/18 69/3 84/3 96/24 111/22 121/25 123/11 129/11 129/15 130/1 140/24 141/2 147/5 153/20 157/12 looks [3] 88/23 88/24 91/1 loss [5] 3/10 4/3 8/13 8/14 11/5 losses [2] 66/19 66/22 lost [6] 10/12 130/10 131/8 132/7 137/21 138/25 lot [20] 8/11 12/25 13/7 20/17 23/20 53/15 54/2 54/3 54/5 59/3 60/16 86/17 86/17 88/25 117/11 120/12 134/25 138/10 140/15 156/24 lots [3] 10/17 108/15 111/1 loud [2] 39/6 39/7 lunch [7] 109/10 110/6 111/18 123/3 129/10 129/15 152/15	M Macdonald [1] 66/15 machinery [1] 154/1 made [25] 17/10 34/15 35/6 36/17 42/24 67/10 68/6 70/11 70/12 83/22 88/19 94/8 107/17 107/24 110/10 114/6 116/24 117/25 121/15 122/17 122/23 124/2 150/2 150/16 153/18 main [3] 3/25 4/20 4/21 majority [1] 8/11 make [12] 14/4 17/12 107/7 109/19 117/3 117/7 127/9 129/23 130/8 130/19 130/25 140/2 maker [3] 14/9 14/10 14/11 makers [1] 14/3 making [3] 54/4 78/18 133/24 manager [3] 120/15 121/10 129/3 manual [1] 13/8 many [3] 70/3 70/25 143/16 March [2] 108/21 148/7 Mark [5] 64/10 74/3 74/5 74/18 75/1 marked [1] 83/4 Martin [1] 54/20 material [41] 16/21 17/1 17/3 17/24 23/6 25/1 25/17 28/13 28/15 28/15 30/11 85/17 111/19 111/25 112/18 113/10 113/17 114/19 115/5 116/22 116/25 118/1 118/4 118/8 118/10 119/1 120/4 121/5 121/24 123/9 127/12 133/21 133/22 137/16 137/17 138/12 155/2 155/13 155/23 158/1 158/2 materially [3] 113/19 114/4 122/5 materials [1] 23/3 matter [11] 19/10 27/18 82/9 91/5 95/22 118/15 120/22 126/11 135/4 146/5 154/11 matters [17] 3/5 14/22 20/2 21/5 21/6 24/11 25/13 29/25 38/2 73/1 95/4 97/4 100/22 117/4 117/12 143/3 154/15
K	keep [3] 32/19 74/20 93/25 Keith [2] 123/23 151/13 kept [2] 119/13 120/20 kind [5] 52/10 69/1 108/22 117/9 128/15 kindly [1] 72/25 knew [22] 19/15 20/20 21/16 22/19 23/19 23/20 27/6 37/4 43/6 44/9 45/17 46/19 49/2 49/19 49/20 50/15 53/18 58/6 59/8 59/11 87/13 125/3 know [214] knowledge [14] 19/18 23/11 24/20 38/1 40/1 40/24 42/1 67/13 72/13 73/17 76/25 77/4 79/14 123/22 knowledgeable [3] 20/18 42/3 141/8 known [21] 50/1 54/2 67/22 82/16 84/20 94/16 96/1 97/10 97/18 98/12 105/20 107/3 109/24 124/3 124/7 129/18 130/20 131/1 137/20 138/24 150/20			
L	lack [1] 104/15 landed [1] 104/13 language [3] 56/14 56/19 60/6 large [4] 3/10 4/2			

M	72/14 73/14 73/18 73/19 74/15 74/22 75/6 79/3 79/18 79/19 80/18 80/21 85/11 85/18 85/19 85/25 86/2 87/8 88/13 89/3 90/2 90/20 96/4 96/10 98/6 98/7 100/23 104/18 106/7 108/9 108/11 108/13 108/22 115/20 122/14 124/11 127/23 131/13 131/21 132/21 140/18 141/14 141/18 142/21 143/19 143/23 144/24 144/25 145/12 146/20 146/22 149/8 150/10 150/21 152/23 152/23 155/25 157/13	27/11 32/1 36/13 55/8 55/18 55/20 57/17 62/14 64/20 103/22 103/24 112/1 140/2 151/15 Misra's [2] 19/2 139/20 missed [1] 153/8 missing [2] 83/10 102/9 mistakes [1] 109/25 misunderstanding [1] 30/23 Mm [2] 70/9 72/20 moment [34] 6/18 13/24 14/20 19/22 30/5 42/21 43/2 44/4 46/14 47/4 48/1 48/12 48/13 49/17 54/4 63/24 69/19 74/15 79/22 80/16 82/24 84/10 85/23 87/14 87/25 96/6 128/22 139/3 140/11 140/13 145/15 149/16 150/15 157/20 Monday [7] 81/9 99/9 99/13 100/14 100/18 102/13 103/9 money [2] 10/6 10/6 months [9] 102/11 103/18 104/7 104/11 105/20 105/23 106/15 119/25 157/8 more [44] 3/2 9/19 15/6 31/12 43/7 48/24 49/7 49/10 51/21 53/6 60/7 60/8 64/25 73/19 78/13 87/15 88/11 89/3 101/10 108/7 120/10 122/12 122/14 122/15 122/16 122/20 131/10 132/11 138/14 139/5 142/10 146/20 147/3 148/16 148/18 148/22 149/20 151/7 154/8 156/18 157/5 157/11 157/13 157/15 morning [11] 1/5 1/9 1/10 1/10 52/7 52/17 89/20 91/3 102/6 125/9 146/12 most [6] 8/11 101/7 140/13 157/3 157/8 157/17 mountain [1] 78/5 move [14] 6/22 65/5 81/3 89/7 99/2 101/14 126/2 127/2 128/1 139/6 144/5 147/9 147/13 151/25 moving [2] 46/8 86/19 MR [212]	Mr Beer [7] 21/24 51/23 110/20 135/8 135/14 136/16 159/15 Mr Beer's [1] 51/20 Mr Bolc [1] 54/20 Mr Dinsdale [2] 73/20 74/8 Mr Dunks' [1] 102/14 Mr Flemington [1] 54/20 Mr Gareth [1] 122/5 Mr Hadrill [1] 152/2 Mr Jenkins [97] 19/22 26/18 27/10 27/20 27/23 28/11 30/3 30/6 30/24 31/1 32/4 33/3 33/14 34/5 34/22 37/24 38/14 40/19 41/25 42/24 43/11 46/17 47/8 47/18 47/19 48/2 48/16 48/19 48/19 48/21 50/14 51/14 51/16 53/6 53/11 54/10 56/15 56/20 57/6 57/25 58/2 58/17 59/1 59/9 61/9 70/13 71/7 85/4 88/20 89/17 89/21 92/6 94/9 94/22 95/4 96/25 97/2 97/9 98/1 100/16 101/22 102/16 105/15 107/6 123/4 124/5 124/9 124/20 124/25 125/4 126/18 127/11 127/16 128/22 129/21 130/3 130/18 130/24 133/24 134/2 134/24 137/19 139/6 144/17 144/23 145/6 145/20 148/10 149/12 149/22 150/15 151/1 154/25 154/25 155/18 155/21 157/24 Mr Jenkins' [10] 40/5 62/15 62/18 64/1 92/8 101/17 139/14 144/6 147/23 150/25 Mr Jones [10] 89/12 90/10 92/5 101/16 103/5 129/11 130/4 131/10 134/2 156/21 Mr Jones' [5] 90/22 93/13 93/15 93/17 93/20 Mr Longman [18] 62/22 71/14 71/24 72/22 74/4 75/5 75/16 78/18 90/8 93/12 93/17 94/8 94/20 95/3 95/13 103/18 104/7 114/12 Mr Longman's [4] 94/2 95/10 95/20 115/19	Mr Scott [2] 2/12 5/5 Mr Singh [24] 1/9 6/4 30/4 40/4 51/9 52/8 52/20 92/18 99/23 107/1 111/16 119/15 120/24 121/18 135/6 136/7 136/21 137/4 149/21 150/20 156/11 158/8 158/12 159/1 Mr Singh's [2] 5/24 135/9 Mr Tatford [12] 67/3 70/7 71/5 73/25 75/8 82/20 83/22 85/8 93/13 93/16 95/2 114/7 Mr Tatford's [3] 67/4 82/12 129/17 Mr Warwick [1] 137/22 Mr Wilson [2] 64/17 122/9 Mrs [6] 2/18 3/7 3/9 3/13 27/11 151/15 Mrs Gourlay [3] 2/18 3/7 3/9 Mrs Misra [2] 27/11 151/15 Ms [3] 103/22 103/24 130/4 Ms Misra [2] 103/22 103/24 Ms Thomas [1] 130/4 much [24] 1/8 6/13 20/8 32/10 40/23 43/11 43/11 43/24 52/22 63/22 78/14 78/16 79/20 79/21 86/1 88/3 100/23 109/12 111/8 129/9 142/8 149/18 152/24 156/16 must [9] 34/16 45/3 99/21 100/10 118/11 125/9 136/10 147/12 150/20 mutual [1] 148/13 mutually [1] 148/5 my [58] 1/19 2/16 3/4 3/8 4/21 4/22 8/6 10/6 10/23 18/19 19/3 21/8 22/23 24/4 24/6 24/20 33/2 34/2 34/18 36/6 39/16 42/1 46/21 47/1 49/18 49/24 51/22 57/11 59/8 64/24 65/19 78/22 79/4 82/1 86/23 100/21 104/13 104/19 119/4 120/5 120/5 120/15 121/10 125/17 129/3 133/10 134/8 134/22 137/7 137/18 141/24 142/9 142/9 145/23 145/25
----------	---	---	--	---

M	27/22 28/3 29/23 30/13 30/15 30/17 30/18 30/20 31/11 32/1 34/20 39/2 42/8 42/8 44/1 44/1 44/1 46/21 46/24 46/25 47/10 47/13 47/15 47/15 48/10 48/17 54/9 56/18 57/3 58/7 60/24 60/24 61/10 61/10 61/12 61/12 61/14 61/14 61/18 62/3 62/6 64/6 64/6 76/24 76/24 80/15 97/7 98/2 99/12 99/20 99/20 99/24 100/2 101/13 105/1 106/2 108/9 109/21 110/23 110/23 112/18 112/25 113/1 113/3 113/7 113/13 113/13 114/13 119/14 119/14 122/12 124/1 124/7 128/6 132/25 133/2 136/1 136/22 137/6 141/18 143/23 145/13 148/9 148/22 153/17 154/10 155/12	11/11 12/10 14/22 28/23 33/1 46/2 52/20 56/8 56/9 57/10 59/17 64/7 70/25 71/12 72/24 79/21 84/3 84/7 85/3 86/1 86/18 86/21 87/12 90/25 103/22 113/20 121/16 125/21 131/3 136/11 136/15 144/6 145/16 146/21 148/24 152/24 156/20 156/22 159/2 159/8	offenders [5] 1/14 1/22 7/3 8/17 14/24 offending [1] 9/23 offer [3] 9/2 78/18 105/1 offered [1] 8/17 office [79] 1/15 7/2 7/11 7/14 8/15 11/13 11/22 13/8 14/8 14/18 14/23 18/21 18/22 20/16 22/20 26/14 26/18 27/11 29/3 29/22 29/23 33/6 34/12 35/7 35/8 35/23 37/6 37/13 41/24 42/10 43/23 44/24 45/10 45/20 62/10 68/3 68/8 68/10 68/13 68/18 68/25 69/4 69/25 71/3 72/2 72/7 72/21 75/12 76/4 76/22 82/4 84/19 87/20 88/15 91/4 91/7 91/16 91/18 91/20 92/13 95/8 102/2 102/19 103/2 103/7 106/3 107/14 118/16 132/13 132/16 132/19 135/4 136/2 139/19 139/23 141/4 144/16 154/1 155/9 Office's [3] 49/25 85/6 127/16 officer [16] 5/1 29/5 29/13 45/5 56/1 72/8 73/13 78/11 112/4 114/18 115/9 116/4 116/6 116/17 119/4 119/6 Officers [1] 4/13 Officers [4] 32/24 42/5 64/12 75/1 offices [1] 66/18 often [1] 121/6 oh [6] 76/15 83/12 92/19 115/20 115/20 153/10 okay [24] 2/8 14/6 15/23 33/8 33/11 40/15 47/3 47/3 47/20 47/22 55/6 61/6 62/20 64/14 81/3 82/14 90/19 92/22 93/24 106/12 109/11 121/4 137/9 153/1 old [1] 134/19 omission [1] 76/17 on [228] once [1] 29/8 one [57] 5/10 7/23 8/7 9/24 10/13 12/1 12/22 12/24 13/10 15/22 15/22 15/24 18/17 20/13 24/17	33/16 42/6 42/19 43/2 43/17 51/10 57/12 64/12 64/21 65/6 65/14 72/15 78/13 83/2 91/20 105/5 109/2 109/8 110/6 110/10 112/15 116/4 117/8 117/19 120/8 120/11 120/18 126/19 128/16 130/9 140/5 140/17 141/6 142/13 143/11 145/3 150/8 150/11 153/9 156/6 156/9 156/13 one-off [1] 9/24 ones [3] 3/25 13/20 113/2 only [30] 6/9 19/8 19/11 20/11 31/15 39/19 42/9 44/8 44/11 44/12 48/19 55/9 64/25 95/7 98/7 98/13 98/23 100/20 108/12 115/14 117/21 132/9 133/21 136/10 137/16 144/15 144/22 145/5 151/2 155/4 onwards [3] 125/2 125/3 125/7 operation [3] 19/9 27/4 39/21 operator [1] 153/4 operators [3] 79/14 80/8 109/18 opine [1] 105/16 opinion [14] 2/16 3/4 3/8 16/14 18/1 23/3 24/10 24/12 24/13 25/6 25/12 25/16 25/21 26/3 opinions [3] 20/7 20/25 23/6 or [187] order [16] 10/15 16/22 18/6 28/13 31/3 31/4 36/24 43/17 86/5 86/11 88/17 89/23 102/17 106/20 125/25 151/6 ordered [4] 81/8 123/24 126/13 154/14 ordinary [1] 146/8 organisation [2] 106/5 110/2 original [1] 97/24 originally [2] 34/1 132/13 other [50] 1/16 1/22 3/14 5/4 5/10 5/17 10/18 11/4 11/14 12/7 13/11 20/15 20/19 23/23 24/18 25/1 28/20 31/17 31/19 43/18 47/2 48/24
N	name [2] 50/8 59/25 namely [2] 84/1 111/18 narrowing [1] 43/12 nature [9] 22/9 24/6 35/25 65/1 79/25 87/3 128/20 131/22 135/3 necessary [8] 20/2 26/19 27/12 31/2 105/21 145/21 146/10 159/3 need [26] 6/8 19/17 24/3 25/23 27/24 30/8 50/2 51/16 53/12 55/12 60/5 65/7 74/1 91/17 92/3 98/4 101/1 101/19 105/17 115/21 122/8 127/9 136/20 155/5 158/8 158/18 needed [15] 18/5 20/21 29/15 29/17 29/19 34/15 36/16 45/10 46/10 48/24 53/19 72/1 102/19 115/6 137/8 needs [12] 6/4 25/22 81/18 88/16 92/12 96/18 98/21 106/21 117/16 119/2 120/6 135/10 neither [2] 145/19 146/9 nervous [2] 142/2 142/2 never [17] 4/9 4/20 13/23 18/18 18/22 18/25 21/7 22/10 35/1 35/22 45/15 50/5 56/2 56/3 95/8 141/3 141/24 new [8] 23/13 35/24 65/4 111/7 118/21 139/9 152/7 159/11 New Year [1] 111/7 next [10] 6/16 7/7 9/21 82/14 95/2 110/15 110/15 110/19 115/23 116/2 nice [3] 18/10 34/5 34/5 Nixon [1] 66/9 no [105] 1/20 1/20 1/25 2/1 2/2 9/17 10/2 10/9 10/9 15/5 18/24 19/1 19/7 21/11 22/9 26/17 26/22 27/9	number [11] 10/17 30/1 62/25 65/18 98/14 104/1 106/25 106/25 114/14 130/7 146/25 number 3 [3] 106/25 106/25 130/7 numbered [1] 138/20	objective [1] 25/12 obligation [3] 104/24 113/15 158/12 obligations [9] 17/13 22/23 86/7 86/13 88/17 126/22 127/20 132/14 132/19 observing [1] 135/18 obtain [4] 68/17 102/19 103/23 105/21 obtained [2] 102/23 153/24 obtaining [7] 36/19 44/15 44/17 85/17 89/14 104/8 104/17 obvious [2] 21/2 115/17 obviously [24] 11/18 14/1 23/19 49/2 49/24 50/16 50/19 73/14 78/15 83/15 84/25 88/9 96/5 101/11 107/20 108/18 109/25 111/4 125/11 125/17 127/22 145/24 156/25 158/7 occasion [1] 110/15 occurred [2] 67/14 78/3 October [8] 29/1 32/3 53/2 62/8 119/21 119/23 126/16 128/9 October 2010 [3] 32/3 53/2 62/8 off [14] 1/11 5/21 9/24 77/10 104/13 109/9 111/3 111/22 117/18 122/20 128/23 129/10 132/1 142/20 offence [1] 9/24 offender [3] 9/2 10/25 11/19	
	O			

O	120/9 122/20 128/7 130/20 130/25 147/11 152/4 153/24 153/25 154/12 overall [2] 39/23 88/14 overlooked [4] 120/16 145/24 146/2 146/24 oversight [2] 126/25 127/22 owed [7] 17/17 34/23 53/13 58/20 61/16 69/1 126/23 own [8] 57/23 59/20 79/4 85/6 126/3 126/17 145/25 155/12	67/10 paragraph 28 [1] 3/3 paragraph 3 [2] 57/20 151/23 paragraph 4 [1] 151/25 paragraph 6 [3] 67/7 82/11 153/1 paragraph 69 [2] 36/11 41/19 paragraph 7 [5] 75/25 83/7 83/9 129/17 153/14 paragraph 70 [1] 52/25 paragraphs [6] 38/9 38/13 39/11 40/4 40/8 124/23 parameters [2] 74/6 113/5 parcel [1] 141/13 part [11] 3/15 6/20 21/18 28/1 30/9 30/12 31/8 51/10 78/10 136/12 141/13 Part 33 [1] 21/18 Participant [1] 135/23 Participants [2] 110/8 110/24 particular [30] 2/4 4/23 4/24 5/16 14/20 35/20 35/21 36/5 53/19 54/4 59/4 72/15 74/15 79/22 80/15 84/10 87/14 87/25 96/6 107/9 111/5 114/5 122/13 130/10 131/8 133/13 136/12 139/3 140/12 145/15 particularly [1] 4/25 parties [5] 3/14 25/15 43/17 45/19 58/8 partnership [1] 87/8 parts [1] 39/3 party [12] 71/5 85/16 85/17 86/5 86/8 86/9 87/2 87/3 87/4 118/22 118/23 133/3 pass [1] 114/3 passed [7] 14/7 14/9 14/18 40/13 102/2 105/25 149/18 past [6] 55/7 55/17 56/10 66/18 66/20 143/17 paste [1] 80/25 pay [1] 9/19 peculiar [1] 4/23 pen [3] 52/5 52/8 52/21 Penny [11] 44/22 45/7 71/14 75/17 81/5 90/8 91/6 94/8 95/14	95/16 139/8 penultimate [1] 74/2 people [5] 44/22 114/14 131/16 131/24 146/25 people's [2] 105/25 106/10 perform [1] 115/3 perhaps [5] 3/20 48/24 55/12 92/3 129/13 period [20] 8/2 9/23 15/4 22/19 29/20 40/13 42/18 54/1 65/11 91/22 102/10 102/10 118/18 119/18 119/24 120/9 120/25 122/13 131/25 156/24 permissible [2] 9/8 9/16 permit [1] 134/16 permitted [1] 154/4 person [19] 14/19 19/8 28/5 31/15 43/3 44/8 44/11 44/19 48/23 50/22 51/14 58/7 58/12 80/19 89/18 116/3 119/3 147/6 156/4 personal [2] 10/1 72/5 personally [1] 124/7 persons [1] 9/25 perspective [1] 65/8 Phase [1] 158/18 Phase 5 [1] 158/18 phone [1] 30/1 phoned [1] 29/21 phrase [1] 69/22 physically [1] 28/22 pick [2] 1/11 120/16 picked [1] 129/5 Picking [1] 129/10 piece [1] 64/23 pieces [1] 26/5 place [9] 29/16 29/17 36/3 39/7 45/14 115/17 133/22 137/17 140/16 placed [2] 17/2 135/11 plainly [1] 158/18 play [2] 38/25 51/6 played [1] 10/23 please [80] 2/8 2/9 2/25 3/1 5/7 5/10 36/10 36/11 37/22 41/19 51/21 52/12 52/25 54/14 55/16 57/20 64/8 64/10 65/15 66/8 66/9 66/17 67/7 71/12 73/1 73/9 74/3 75/15 77/8 77/11 77/16 77/18 77/20	78/9 81/3 81/4 89/9 90/19 92/22 92/23 93/7 93/25 95/1 95/22 99/2 99/6 101/6 101/14 101/16 103/16 103/17 104/2 109/11 110/4 112/20 113/8 114/17 123/11 123/13 123/19 123/20 128/1 128/7 130/2 130/14 133/7 138/18 139/13 144/5 144/19 147/10 147/12 147/14 150/15 151/10 151/12 151/14 151/25 153/14 159/17 pleased [1] 52/20 plural [2] 124/16 124/17 plus [4] 29/11 116/18 117/9 142/14 pm [10] 81/9 99/3 100/17 110/5 110/13 111/9 111/11 136/24 137/1 159/20 point [18] 34/21 43/13 46/6 46/6 46/7 48/16 55/25 78/17 94/11 94/14 96/24 98/4 98/21 118/13 124/17 125/2 126/15 144/14 pointed [1] 146/21 pointers [1] 24/2 pointing [2] 61/8 102/16 points [10] 12/20 71/4 81/19 94/5 94/10 95/17 95/19 124/1 124/17 144/22 POL [1] 95/5 POL00001569 [1] 139/14 POL00001882 [1] 128/1 POL00020489 [1] 54/14 POL00029369 [1] 92/22 POL00031352 [1] 57/14 POL00044553 [1] 77/8 POL00044557 [3] 67/4 75/22 83/6 POL00045565 [1] 123/12 POL00052202 [1] 103/16 POL00053723 [1] 64/8 POL00053745 [1] 72/18 POL00054056 [1] 144/5
	P			
	page [34] 2/10 2/25 36/11 37/22 41/19 52/25 66/7 66/11 66/16 66/23 67/8 75/23 75/24 77/9 77/10 77/18 78/9 81/5 83/6 89/10 89/12 112/23 113/8 123/12 123/14 128/7 128/8 128/11 130/2 147/11 151/12 151/14 153/9 154/12 page 1 [3] 66/23 113/8 151/14 page 2 [2] 67/8 128/11 page 24 [2] 36/11 41/19 page 25 [1] 52/25 page 3 [1] 83/6 page 4 [1] 2/25 page 67 [1] 37/22 pages [2] 2/22 158/4 paid [1] 11/7 paper [4] 26/5 52/5 52/8 52/23 papers [13] 2/16 6/10 6/12 33/5 34/4 53/15 53/22 54/3 62/10 96/11 98/7 98/9 132/10 paperwork [3] 67/16 108/12 145/1 paragraph [25] 3/3 36/11 37/22 41/19 44/14 52/25 57/20 67/7 67/10 73/3 73/4 75/25 82/11 83/7 83/9 83/9 123/19 129/17 136/12 138/21 151/20 151/23 151/25 153/1 153/14 paragraph 2 [2] 136/12 138/21 Paragraph 23 [1]			

P	potential [1] 1/22 potentially [2] 64/1 64/24 power [2] 7/10 14/23 powers [1] 7/15 practical [2] 46/5 145/14 practicality [1] 15/3 practice [10] 8/1 29/3 51/24 72/4 106/6 113/16 141/10 141/20 142/3 158/20 pragmatic [1] 135/21 pre [2] 81/7 152/10 precedent [1] 11/24 precise [1] 60/7 precisely [5] 59/21 60/6 74/22 79/24 159/5 preliminary [3] 150/8 150/11 150/13 premises [1] 80/8 prepare [2] 52/8 149/8 prepared [2] 123/21 128/3 preparing [1] 78/12 present [3] 32/4 66/18 66/20 presented [1] 78/4 press [2] 93/7 98/4 pressed [1] 98/21 pressure [2] 56/8 146/2 pressures [1] 60/3 presumably [16] 30/16 32/19 74/17 74/25 77/25 79/7 101/4 107/19 108/22 117/3 117/7 117/10 118/13 120/3 124/11 146/21 presume [2] 63/4 115/21 Presuming [1] 100/14 pretty [2] 32/19 33/19 previous [2] 91/24 134/22 primary [1] 49/18 prime [1] 50/21 principal [2] 142/14 142/16 prior [1] 29/2 private [2] 72/3 106/6 privy [1] 44/21 probably [20] 5/18 10/19 14/15 14/16 14/16 23/16 23/20 28/25 40/21 45/13 45/17 56/13 60/3 60/8 73/4 86/15 99/14 105/2 112/22 119/20 problem [9] 41/18	67/22 91/1 130/9 131/11 136/22 137/20 138/24 140/5 problems [21] 62/25 63/2 82/17 84/20 87/23 94/17 96/1 97/10 97/16 97/18 98/12 98/18 107/3 107/8 107/22 108/5 109/21 130/20 131/1 131/7 139/22 procedure [8] 1/13 7/17 21/17 22/3 26/20 29/16 97/4 102/25 procedures [7] 29/24 36/19 44/15 44/17 45/1 45/14 91/16 proceed [1] 98/20 proceeding [1] 88/15 proceedings [2] 15/12 22/12 process [11] 1/13 4/10 13/12 29/17 72/11 73/12 73/18 102/25 116/4 141/5 151/17 processes [1] 106/8 produce [4] 43/19 47/6 47/25 63/5 produced [3] 71/18 76/12 81/22 producing [1] 154/8 production [1] 47/24 professional [5] 20/5 20/23 21/20 44/6 51/8 professor [14] 21/10 41/5 41/14 76/13 102/18 105/16 128/4 144/20 145/7 148/11 149/23 149/25 154/4 155/6 Professor McLachlan [4] 21/10 128/4 144/20 149/23 Professor McLachlan's [3] 76/13 105/16 145/7 progress [1] 110/9 progressed [2] 19/10 120/22 progression [1] 157/23 promulgated [1] 113/16 proper [1] 126/13 propose [1] 110/12 proposed [2] 133/17 134/3 prosecute [4] 1/23 2/19 3/9 3/18 prosecuting [2] 1/14 20/18 prosecution [55] 1/15 3/11 3/16 3/20	4/5 5/8 7/25 8/10 11/14 14/8 14/18 17/2 18/2 26/13 26/13 27/2 28/6 29/21 29/22 31/3 32/12 33/20 34/13 38/6 44/23 45/22 48/23 50/23 53/20 58/8 59/13 68/14 76/19 86/24 90/18 96/17 98/14 117/13 121/6 126/14 133/20 137/13 137/15 146/18 147/7 153/2 153/5 153/11 154/7 154/14 154/17 154/19 154/22 155/11 156/2 prosecution's [2] 121/19 122/2 prosecutions [5] 53/25 66/20 98/15 98/17 98/20 prosecutor [28] 15/9 15/11 16/1 16/6 16/12 16/25 17/6 17/11 17/16 17/22 17/25 18/6 18/16 61/16 68/8 86/4 86/6 86/11 87/1 87/4 88/18 104/23 106/9 108/7 125/9 126/23 129/7 142/10 prosecutor's [2] 76/20 85/15 Prosecutors [2] 8/18 8/20 prospect [2] 2/18 3/6 provide [22] 2/17 3/6 16/13 16/19 25/11 27/20 27/23 28/10 28/16 65/3 65/13 66/9 66/17 67/21 88/20 92/1 104/24 104/25 107/13 107/16 108/4 135/24 provided [21] 6/2 6/19 6/21 23/4 28/24 30/5 30/21 34/3 35/7 53/15 55/10 62/20 86/20 91/23 101/25 108/13 137/19 145/20 148/9 155/13 155/23 provider [1] 133/4 providing [1] 147/16 provision [1] 16/9 public [7] 2/19 3/8 4/1 7/9 7/22 7/22 8/8 purely [13] 22/9 27/14 28/3 28/17 86/15 86/24 140/14 141/2 143/13 144/3 147/4 149/5 151/5 purpose [1] 93/9 purposes [3] 47/17 71/22 94/25 pursue [1] 1/15	put [23] 10/19 28/4 29/9 29/10 31/15 34/2 34/5 35/16 36/25 39/7 41/8 44/9 55/23 57/11 58/5 60/18 71/2 78/24 93/23 96/7 115/10 130/6 145/2 putting [3] 1/21 80/3 129/21
			Q	
			qualifications [7] 15/14 16/4 20/5 20/23 21/21 37/8 41/22 queries [1] 65/18 question [26] 26/9 33/7 33/9 39/9 39/16 46/21 47/2 49/5 49/13 56/18 65/12 70/19 71/20 75/18 75/19 76/23 84/15 84/24 85/13 91/23 96/3 97/23 98/5 101/12 137/10 137/18 Questioned [2] 1/4 160/5 questioning [1] 111/6 questions [28] 15/8 16/16 17/3 23/2 28/8 31/14 36/14 36/16 51/20 64/25 65/2 65/6 65/8 73/20 75/20 91/11 92/9 96/22 99/23 103/10 106/20 110/9 110/12 110/13 110/18 118/24 134/22 155/6 quickly [4] 36/23 51/23 112/22 157/6 quietly [1] 39/6 quite [6] 6/9 6/12 12/25 23/20 112/22 155/17	
			R	
			raise [1] 106/24 raised [9] 36/13 37/2 38/2 63/3 65/20 73/20 82/10 111/17 155/6 raises [1] 65/18 raising [2] 93/21 104/8 range [4] 22/15 24/10 24/12 24/14 rather [9] 7/24 18/9 33/19 47/2 63/12 63/18 71/24 87/20 134/10 re [1] 152/10 re-listed [1] 152/10 reach [1] 78/14 read [18] 2/15 3/23 6/4 6/8 15/17 15/18	

R	130/23 134/1 138/4 153/16	136/13 158/21	144/20 145/22 146/11 154/22 154/25	132/17 138/7
read... [12] 15/19 22/5 22/6 23/10 23/15 66/11 66/12 75/24 83/8 98/6 130/18 133/12	receiving [1] 65/24 recognise [1] 156/16 recognised [1] 129/18	relationship [5] 45/19 45/25 87/7 103/1 104/16	reports [11] 21/13 22/7 29/11 46/16 47/5 47/24 65/10 145/7 152/13 152/16 152/20	responses [4] 130/5 133/13 133/15 154/10
readily [1] 23/13	recollection [3] 1/20 38/7 62/3	relationships [2] 44/22 106/9	representative [1] 72/6	responsibilities [1] 59/9
reading [3] 24/7 39/3 53/22	recommend [1] 14/6	relatively [1] 67/20	representatives [5] 78/13 78/20 79/12 80/11 136/3	responsibility [1] 125/18
real [2] 41/18 46/7	recommendation [1] 50/14	relay [1] 80/6	represented [1] 42/2	responsible [2] 91/7 114/18
real-world [2] 41/18 46/7	recommended [6] 13/15 14/4 14/5 28/4 30/2 49/3	release [1] 158/12	representing [1] 135/23	rest [3] 34/6 142/12 143/7
realise [2] 155/18 157/7	reconsider [2] 55/12 96/12	relevant [18] 1/22 9/1 15/14 16/3 17/3 17/7 17/23 18/2 20/6 20/24 21/22 24/25 34/23 77/25 94/25 118/1 127/13 140/3	reproduce [2] 94/6 95/18	result [1] 66/22
realised [1] 98/11	record [7] 28/12 30/10 31/3 31/5 32/20 34/21 150/16	reliance [1] 17/1	reproduced [1] 71/20	resume [1] 111/6
realistic [2] 2/17 3/6	recorded [2] 71/21 86/10	reliability [2] 89/16 152/5	request [26] 36/16 36/22 64/19 66/2 66/2 66/24 77/15 83/22 83/25 84/16 84/19 85/3 85/7 87/21 88/19 94/7 94/21 96/16 100/15 105/12 129/20 134/11 135/9 135/25 153/6 153/11	retained [3] 23/12 24/22 138/16
reality [4] 58/10 59/3 87/25 135/13	recording [1] 126/18	relied [5] 18/25 20/9 20/14 26/17 27/10	requested [9] 63/8 82/2 91/21 92/2 92/15 102/24 117/16 154/7 155/8	retrieving [1] 102/5
really [21] 13/10 33/23 46/21 63/20 63/22 65/4 80/9 80/21 85/13 88/3 89/4 118/20 132/11 138/14 140/9 140/10 145/3 149/7 149/19 157/6 157/6	records [1] 150/2	reluctant [3] 130/8 130/19 130/25	requesting [4] 105/9 117/11 143/10 153/21	return [4] 89/21 123/2 136/19 159/3
rearrange [1] 85/21	recovered [3] 10/12 10/14 11/6	rely [4] 15/11 16/2 37/6 37/13	requests [9] 36/25 74/7 74/10 81/8 95/7 145/6 153/17 154/8 159/9	returning [1] 158/22
reason [9] 4/22 60/16 100/3 110/11 118/19 125/19 135/8 135/24 143/25	recovery [4] 9/5 9/21 9/22 10/4	relying [4] 40/23 43/25 54/5 157/13	require [5] 75/9 76/20 91/12 92/10 93/9	returns [2] 110/14 158/16
reasoning [2] 4/5 5/11	red [1] 107/19	remains [1] 158/10	required [10] 16/6 22/14 22/25 24/9 24/25 25/8 26/19 97/5 114/22 147/2	reveal [1] 137/18
reasons [7] 20/14 24/13 120/18 141/6 143/12 156/6 156/13	refer [2] 44/14 89/13	remember [27] 12/6 15/20 64/11 72/17 73/20 75/8 75/13 82/11 84/14 95/12 106/25 113/20 123/6 124/23 129/14 138/1 138/13 138/17 140/19 140/20 141/17 143/6 144/4 145/17 148/23 149/4 152/25	requirements [4] 18/10 26/2 86/18 91/16	revealed [4] 98/12 138/4 138/7 158/2
recall [68] 32/25 37/5 53/4 53/7 68/21 70/20 70/25 72/17 77/7 79/24 83/1 84/10 84/14 84/22 84/23 85/1 85/13 86/3 86/14 87/6 90/2 90/15 96/4 98/2 113/23 122/24 129/1 132/8 132/21 134/5 138/1 138/2 138/13 138/17 139/2 139/4 140/10 140/13 140/18 140/22 141/17 142/7 142/8 143/25 144/3 144/24 145/16 145/17 148/24 149/10 149/14 150/4 150/6 150/21 150/21 151/8 152/23 152/24 155/19 155/22 155/25 156/15 156/17 156/20 157/3 157/5 157/8 157/17	refers [1] 67/11	reminding [1] 97/2	requirement [5] 75/9 76/20 91/12 92/10 93/9	revelation [1] 157/25
received [12] 12/17 23/2 31/7 90/25 95/12 106/18 127/4 130/13	reflected [1] 82/11	remind [1] 129/13	required [10] 16/6 22/14 22/25 24/9 24/25 25/8 26/19 97/5 114/22 147/2	revert [1] 78/17
	reflection [1] 155/15	reminders [1] 30/6	requirements [4] 18/10 26/2 86/18 91/16	review [5] 89/1 91/10 115/6 117/2 152/10
	refocus [1] 39/9	reminding [1] 97/2	requires [2] 67/25 76/1	reviewed [7] 2/15 18/1 115/11 120/9 120/13 133/21 137/16
	reformulated [1] 84/16	remit [1] 104/19	requiring [1] 66/5	reviewing [13] 112/7 114/13 114/25 115/3 115/13 115/17 115/21 115/23 116/3 116/6 116/23 117/22 122/22
	reformulation [1] 84/24	repaid [1] 10/6	research [2] 6/15 22/22	revisions [1] 102/1
	refuse [1] 135/9	repeat [1] 22/6	Resident [1] 126/11	revisit [1] 144/25
	regard [5] 38/6 66/23 73/2 89/14 124/24	repeating [1] 81/24	resorting [1] 8/10	rewritten [1] 61/17
	regarded [3] 66/2 107/19 154/15	replied [2] 63/3 67/3	respect [4] 64/19 85/8 85/16 142/23	right-hand [1] 76/7
	regarding [1] 124/4	replies [6] 71/17 71/21 81/21 95/2 133/10 133/12	respond [8] 28/20 29/19 38/2 77/18 95/9 100/17 102/17 127/8	Rob [5] 50/4 64/18 119/10 119/10 120/3
	regards [1] 103/7	reply [5] 64/2 90/22 94/2 96/5 129/22	respond' [1] 95/6	Robert [1] 119/10
	regular [1] 36/2	report [42] 4/13 5/4 17/19 20/1 20/3 20/7 20/21 20/25 21/8 21/19 22/14 22/25 23/7 24/10 24/24 25/8 25/22 31/8 31/13 43/14 43/20 48/8 62/24 63/3 71/18 76/14 81/22 85/6 88/21 99/7 99/8 101/18 102/18 105/17 126/8 126/14 139/12	responding [2] 31/12 74/8	role [2] 37/3 105/9
	regularly [1] 12/13		response [10] 36/18 63/12 74/5 77/13 85/5 85/6 88/20 95/11	round [1] 28/25
	regulated [1] 8/15			Rules [6] 21/17 22/1 22/2 22/3 26/20 97/4
	regulating [1] 14/25			run [1] 143/17
	relate [3] 82/3 134/17 136/10			S
	relates [1] 134/14			said [48] 5/25 9/21 10/4 11/5 19/7 20/12 20/12 21/12 21/19 22/1 22/6 25/18 29/23
	relating [1] 153/18			
	relation [16] 15/9 25/12 58/12 66/1 67/17 71/6 71/8 71/17 81/21 115/4 125/9 132/13 132/20 136/9			

S	says [19] 3/16 4/5 62/22 67/8 68/4 71/15 79/3 92/21 94/3 95/5 101/16 105/17 107/5 124/6 127/18 130/3 139/8 139/17 152/2 scenario [1] 140/3 scenarios [1] 139/25 schedule [38] 28/11 30/10 108/24 109/14 111/18 111/21 111/24 112/11 112/17 112/19 113/10 114/22 114/23 114/25 115/4 115/10 116/8 116/13 116/18 116/20 116/23 117/1 118/5 118/8 119/2 121/7 121/23 121/23 122/3 122/4 123/25 128/12 128/16 128/24 132/24 133/2 133/5 133/11 scheduling [2] 158/8 159/6 scheme [1] 39/24 scope [1] 73/21 Scotland [1] 2/14 Scott [3] 2/12 4/15 5/5 scratch [1] 36/4 screen [2] 75/21 136/11 scroll [38] 2/10 3/1 36/11 54/15 57/20 64/9 65/15 66/6 66/12 66/13 75/16 77/16 77/20 77/20 81/4 89/9 90/4 90/9 90/19 92/23 92/24 93/11 93/25 95/1 101/22 103/17 112/11 112/20 112/21 112/23 112/24 128/1 128/8 130/14 139/17 147/10 147/11 151/19 searched [1] 117/16 second [10] 22/9 35/25 49/5 71/18 75/23 76/13 78/10 81/22 123/12 140/24 secondly [2] 16/6 68/11 secretary [1] 93/1 Section [2] 77/14 127/10 Section 8 [1] 77/14 Security [7] 13/18 14/7 14/14 36/15 72/21 79/6 91/8 see [61] 1/5 2/11 2/20 33/10 37/10 44/4 52/17 54/18 54/21 58/14 64/8 67/3 69/25 70/7 71/15 72/18 76/11 77/9 77/22 83/3	87/16 89/7 89/10 91/13 92/9 93/2 93/12 93/23 94/10 95/10 95/20 101/16 101/22 103/25 105/3 106/19 108/14 109/3 111/12 111/24 112/12 112/25 114/1 114/11 115/16 123/17 126/2 128/5 128/9 130/3 130/15 130/16 137/2 138/19 138/20 139/14 143/1 144/9 150/8 152/17 159/10 seek [5] 37/6 37/13 65/22 69/15 131/10 seeking [8] 63/12 73/3 73/22 87/1 103/20 120/22 127/6 127/7 Seema [9] 19/2 26/17 32/1 57/17 62/14 64/20 112/1 139/20 140/1 seemingly [1] 97/1 seems [2] 90/10 91/17 seen [11] 5/18 19/3 67/16 88/14 89/25 96/16 97/1 117/23 132/24 134/20 145/5 sees [1] 128/17 self [2] 134/16 136/14 self-incrimination [2] 134/16 136/14 send [4] 29/7 65/15 73/13 144/6 sending [4] 99/10 100/15 147/22 149/12 senior [2] 12/7 143/3 sense [15] 1/13 9/4 26/23 32/14 35/19 35/24 36/9 56/13 56/24 86/22 122/15 122/16 134/11 142/3 148/17 sensitive [6] 111/19 111/25 114/23 115/4 118/8 118/10 sent [14] 45/9 72/16 75/4 93/1 93/12 96/17 96/20 105/12 118/7 118/9 129/12 141/11 150/24 151/1 sentence [4] 3/15 4/8 41/20 85/22 separate [2] 71/2 85/5 September [8] 54/18 57/9 109/6 111/19 111/20 112/12 118/14 118/17 September '10 [2]	109/6 118/17 September 2010 [1] 111/20 series [3] 114/2 117/25 118/24 serious [3] 121/18 122/2 129/6 serve [2] 126/8 126/13 served [6] 93/10 113/19 118/11 144/11 154/9 154/24 service [5] 46/15 47/5 152/12 152/16 152/20 services [2] 103/20 112/9 serving [1] 146/7 session [1] 110/6 set [8] 16/15 16/25 45/14 140/24 140/25 144/17 149/7 150/7 sets [1] 95/3 setting [1] 23/1 settled [1] 151/12 shakes [1] 136/1 Shall [1] 136/17 share [1] 40/15 shared [3] 142/22 142/24 142/25 she [13] 45/8 50/8 67/12 67/12 78/2 135/23 142/18 142/19 142/20 142/21 143/1 143/2 143/3 short [5] 9/23 52/15 111/10 136/25 154/24 shortly [1] 128/10 should [60] 6/5 8/16 16/15 28/12 40/16 40/22 41/3 41/12 41/13 41/13 47/6 47/25 49/11 49/25 50/25 60/7 67/19 73/3 74/4 83/12 83/22 86/7 87/2 88/10 95/6 98/19 99/1 99/1 112/8 113/25 115/8 116/16 116/25 117/3 117/9 118/2 122/12 122/14 122/15 122/17 123/25 125/18 125/24 126/25 127/24 129/4 130/6 133/5 133/5 135/9 138/4 138/7 140/2 147/1 148/10 149/22 150/1 150/2 154/22 155/9 shouldn't [7] 56/9 57/13 58/3 80/21 84/6 98/20 135/24 show [2] 116/3 147/22 showed [3] 123/6	124/23 145/24 sic [1] 27/14 sick [1] 89/22 side [9] 48/15 75/22 76/7 83/5 83/6 83/9 87/10 142/13 156/9 sight [1] 103/11 sign [4] 115/13 115/14 115/18 117/17 signature [2] 115/18 115/19 signed [10] 60/11 61/5 77/10 109/9 111/21 114/10 114/11 115/23 116/2 122/6 significant [5] 62/6 76/17 97/8 98/13 108/8 signing [1] 128/23 silence [1] 62/2 similar [1] 64/25 simple [4] 74/17 81/2 102/4 104/24 simply [2] 58/13 135/18 since [7] 11/13 15/5 72/7 136/9 138/10 141/10 141/16 SINGH [27] 1/3 1/9 6/4 30/4 40/4 51/9 52/8 52/20 92/18 99/23 107/1 110/14 111/16 119/15 120/24 121/18 135/6 136/7 136/21 137/4 149/21 150/20 156/11 158/8 158/12 159/1 160/3 Singh's [2] 5/24 135/9 single [3] 7/20 65/11 115/7 sir [24] 1/5 5/22 22/4 51/18 51/22 52/3 52/10 52/12 52/17 110/3 111/8 111/12 134/9 134/18 135/10 136/18 137/2 137/6 137/6 157/20 158/4 158/11 158/24 159/12 sit [4] 31/20 32/7 33/20 62/2 situation [1] 107/21 six [8] 15/19 103/18 104/7 104/11 105/20 105/22 106/14 157/8 Sixthly [1] 17/6 skates [1] 136/20 skip [2] 153/24 153/24 slip [1] 21/25 slow [3] 36/20 45/1 142/4 slowly [4] 66/11 106/4 142/4 142/4
----------	---	--	---	---

S				
Smith [1] 54/20 so [131] 1/19 1/25 2/10 6/3 6/13 6/21 8/1 9/8 9/15 10/14 10/19 12/17 14/22 18/12 19/17 21/3 21/10 27/7 29/5 30/22 31/16 32/11 35/9 35/24 36/5 36/20 36/22 37/12 38/19 39/9 42/10 45/3 46/14 47/11 48/21 53/20 54/7 54/9 54/25 57/10 58/22 60/22 61/6 61/16 62/10 65/9 68/17 70/3 70/25 70/25 72/12 73/4 73/8 75/4 78/18 79/9 79/23 80/5 81/4 81/13 82/11 85/9 86/8 86/16 87/14 88/8 88/14 90/5 92/5 92/24 94/7 94/20 95/24 96/13 98/21 99/9 99/17 99/21 99/25 100/9 102/16 103/8 104/7 105/10 106/13 107/16 108/17 109/3 110/5 111/3 112/19 113/2 116/10 116/17 117/24 118/4 118/21 119/11 120/15 124/18 124/22 125/7 126/5 126/17 127/15 128/9 128/15 133/7 133/15 133/24 136/15 136/20 138/16 139/4 140/4 140/18 140/19 141/6 141/10 142/11 144/14 145/17 146/7 146/20 147/3 147/24 149/18 151/19 156/15 159/1 159/10	120/1 123/6 123/9 125/19 125/23 143/25 149/9 151/19 155/6 155/8 somebody [20] 13/3 14/12 27/6 43/6 48/22 49/8 49/19 50/15 51/1 54/12 55/15 59/11 73/16 90/17 92/12 97/17 103/6 104/14 105/6 105/8 someone [1] 37/1 something [42] 4/8 4/12 4/14 5/13 5/23 7/6 13/14 20/8 22/8 23/12 24/22 24/23 26/11 26/12 36/1 40/15 45/16 45/22 46/1 51/22 56/8 56/11 56/12 78/23 78/23 80/1 83/10 96/7 98/25 104/18 104/19 105/7 105/21 108/23 119/14 122/16 125/25 129/5 138/15 141/3 141/14 141/18 sometime [1] 159/10 sometimes [2] 14/12 32/11 soon [2] 65/25 148/6 sorry [47] 1/18 5/20 5/22 5/23 6/1 6/11 6/24 7/4 8/21 9/6 15/16 15/16 15/23 15/25 27/16 32/1 35/2 46/23 51/9 57/19 59/6 64/9 75/19 75/24 76/15 83/14 92/19 92/24 93/15 96/13 97/14 102/21 118/10 119/22 121/4 127/22 130/22 130/22 143/7 146/3 147/11 147/11 153/10 156/11 156/13 158/6 159/4 sort [16] 2/6 10/10 13/2 13/5 28/11 29/16 41/17 50/1 51/7 52/6 120/1 135/2 138/11 141/5 149/9 157/1 sorted [1] 104/11 sorts [1] 110/1 sought [8] 16/15 23/3 23/17 23/22 23/23 70/23 72/1 131/16 speak [4] 36/5 158/13 158/19 159/8 speaking [1] 113/2 special [5] 19/17 35/6 49/19 146/17 147/5 specialist [12] 19/17 27/1 35/5 39/21 44/11 49/19 82/5 146/17	146/18 147/5 148/18 157/10 speciality [1] 35/4 specific [4] 35/5 77/23 78/1 106/23 specifically [1] 4/15 specifics [2] 23/21 34/17 specify [1] 136/8 speculate [1] 80/22 speculating [1] 102/5 spoke [3] 31/6 50/11 90/10 spoken [2] 79/8 90/16 spot [1] 10/19 Square [9] 67/14 67/23 68/11 82/4 94/11 133/23 139/11 139/19 139/22 squarely [1] 97/25 stage [15] 31/11 38/21 40/18 46/3 50/25 50/25 54/9 90/13 99/22 102/7 125/23 138/23 139/21 141/22 142/8 stand [1] 14/22 start [5] 36/4 62/15 112/19 114/16 123/11 started [3] 34/7 129/16 156/18 starting [1] 159/14 starts [1] 66/7 stated [3] 153/5 153/11 154/19 statement [67] 19/4 22/14 22/25 25/9 26/17 28/21 29/4 34/3 36/10 39/4 39/11 42/17 43/19 46/19 47/7 52/24 60/10 60/14 60/22 60/25 61/3 61/7 63/4 63/6 64/3 66/8 71/19 81/12 81/14 81/18 81/23 82/15 82/19 87/22 89/15 89/18 91/9 92/8 93/6 93/18 93/21 94/15 94/19 94/22 102/15 107/7 108/4 109/19 109/21 117/5 124/22 128/2 129/23 129/25 130/6 130/9 130/19 130/25 139/9 139/13 139/15 144/7 144/8 144/19 153/16 154/24 158/17 statements [15] 23/5 27/8 47/25 54/5 62/18 72/6 113/11 113/18 114/2 122/4 145/20 146/8 146/10 147/17 157/25	states [1] 153/17 stating [1] 100/20 status [3] 40/5 42/25 43/5 statute [2] 51/6 60/17 statutory [5] 7/2 7/5 7/15 133/19 137/14 stay [1] 151/15 step [1] 88/13 steps [6] 116/24 120/24 121/7 132/5 132/18 132/23 still [6] 67/19 96/24 99/3 110/18 153/23 154/15 stood [1] 152/4 stop [5] 94/1 95/1 110/3 134/7 159/1 stopped [1] 44/4 stopping [3] 81/15 147/21 152/2 straightaway [1] 96/7 straightforward [1] 67/20 strict [1] 9/17 stringent [1] 78/7 stuff [2] 47/2 157/3 sub [8] 68/3 68/13 75/11 76/3 76/22 84/18 87/20 132/16 subject [1] 57/16 subjects [1] 13/1 submit [2] 114/25 117/18 submitted [4] 110/9 132/10 153/6 153/12 submitting [1] 116/18 subpostmaster [2] 1/24 103/24 subpostmasters [1] 1/16 subpostmasters' [1] 50/7 subsequently [8] 36/24 37/7 41/21 42/14 108/20 117/17 120/15 143/1 substance [2] 23/1 26/3 succinctly [1] 51/21 such [21] 3/22 5/14 11/12 13/6 13/16 15/1 26/25 34/1 51/13 51/24 53/14 56/2 63/20 69/25 79/11 79/12 79/15 80/16 107/14 122/24 138/9 sufficient [3] 2/17 3/5 155/2 suggest [3] 3/18 69/5 71/19 suggestions [1]	114/5 suggestive [2] 56/15 56/20 summarise [1] 54/6 summary [1] 24/12 sun [1] 148/6 Sunday [1] 100/11 supervising [2] 119/4 119/6 supplied [2] 27/10 98/8 supplier [1] 153/3 support [6] 14/8 14/18 29/22 29/22 44/24 91/8 suppose [1] 70/23 supposed [3] 28/16 114/16 115/25 sure [5] 17/12 32/18 88/24 105/10 130/5 surprising [1] 92/16 Surprisingly [1] 92/2 surround [1] 9/25 surrounding [1] 11/2 suspect [1] 11/8 suspected [5] 1/14 7/3 8/17 9/2 10/25 suspicious [2] 99/25 100/2 swift [1] 110/10 system [68] 7/17 19/10 19/16 19/17 26/25 27/1 27/3 27/4 27/6 28/9 29/9 29/17 32/15 35/6 35/16 37/5 39/19 40/3 41/17 43/7 44/9 44/11 49/20 49/20 50/3 50/12 50/15 50/24 53/19 55/12 55/14 58/6 59/11 59/16 60/21 63/1 66/19 72/2 73/17 77/21 79/14 80/9 82/17 83/18 91/25 94/17 97/11 97/16 97/18 98/12 107/4 109/18 129/19 130/21 141/6 146/16 146/17 147/5 148/15 148/16 148/17 148/18 148/20 150/9 150/12 150/14 152/5 156/3 systems [6] 36/19 44/15 44/16 45/1 45/14 106/8
Society [1] 50/9 sole [1] 143/8 solely [1] 135/1 solicitor [15] 5/24 29/4 45/22 57/1 57/4 72/4 77/12 80/2 80/4 81/11 81/15 134/8 134/12 137/12 158/19 solicitors [7] 29/7 133/16 134/4 152/7 154/3 159/7 159/8 solutions [1] 65/19 some [39] 4/22 12/15 15/8 29/16 32/13 32/13 45/9 45/25 46/1 52/8 65/8 65/13 66/14 67/9 67/16 71/23 78/19 79/14 87/5 88/16 89/3 91/1 91/13 92/11 103/2 111/5 118/13 118/24 118/25	sort [16] 2/6 10/10 13/2 13/5 28/11 29/16 41/17 50/1 51/7 52/6 120/1 135/2 138/11 141/5 149/9 157/1 sorted [1] 104/11 sorts [1] 110/1 sought [8] 16/15 23/3 23/17 23/22 23/23 70/23 72/1 131/16 speak [4] 36/5 158/13 158/19 159/8 speaking [1] 113/2 special [5] 19/17 35/6 49/19 146/17 147/5 specialist [12] 19/17 27/1 35/5 39/21 44/11 49/19 82/5 146/17	146/18 147/5 148/18 157/10 speciality [1] 35/4 specific [4] 35/5 77/23 78/1 106/23 specifically [1] 4/15 specifics [2] 23/21 34/17 specify [1] 136/8 speculate [1] 80/22 speculating [1] 102/5 spoke [3] 31/6 50/11 90/10 spoken [2] 79/8 90/16 spot [1] 10/19 Square [9] 67/14 67/23 68/11 82/4 94/11 133/23 139/11 139/19 139/22 squarely [1] 97/25 stage [15] 31/11 38/21 40/18 46/3 50/25 50/25 54/9 90/13 99/22 102/7 125/23 138/23 139/21 141/22 142/8 stand [1] 14/22 start [5] 36/4 62/15 112/19 114/16 123/11 started [3] 34/7 129/16 156/18 starting [1] 159/14 starts [1] 66/7 stated [3] 153/5 153/11 154/19 statement [67] 19/4 22/14 22/25 25/9 26/17 28/21 29/4 34/3 36/10 39/4 39/11 42/17 43/19 46/19 47/7 52/24 60/10 60/14 60/22 60/25 61/3 61/7 63/4 63/6 64/3 66/8 71/19 81/12 81/14 81/18 81/23 82/15 82/19 87/22 89/15 89/18 91/9 92/8 93/6 93/18 93/21 94/15 94/19 94/22 102/15 107/7 108/4 109/19 109/21 117/5 124/22 128/2 129/23 129/25 130/6 130/9 130/19 130/25 139/9 139/13 139/15 144/7 144/8 144/19 153/16 154/24 158/17 statements [15] 23/5 27/8 47/25 54/5 62/18 72/6 113/11 113/18 114/2 122/4 145/20 146/8 146/10 147/17 157/25	states [1] 153/17 stating [1] 100/20 status [3] 40/5 42/25 43/5 statute [2] 51/6 60/17 statutory [5] 7/2 7/5 7/15 133/19 137/14 stay [1] 151/15 step [1] 88/13 steps [6] 116/24 120/24 121/7 132/5 132/18 132/23 still [6] 67/19 96/24 99/3 110/18 153/23 154/15 stood [1] 152/4 stop [5] 94/1 95/1 110/3 134/7 159/1 stopped [1] 44/4 stopping [3] 81/15 147/21 152/2 straightaway [1] 96/7 straightforward [1] 67/20 strict [1] 9/17 stringent [1] 78/7 stuff [2] 47/2 157/3 sub [8] 68/3 68/13 75/11 76/3 76/22 84/18 87/20 132/16 subject [1] 57/16 subjects [1] 13/1 submit [2] 114/25 117/18 submitted [4] 110/9 132/10 153/6 153/12 submitting [1] 116/18 subpostmaster [2] 1/24 103/24 subpostmasters [1] 1/16 subpostmasters' [1] 50/7 subsequently [8] 36/24 37/7 41/21 42/14 108/20 117/17 120/15 143/1 substance [2] 23/1 26/3 succinctly [1] 51/21 such [21] 3/22 5/14 11/12 13/6 13/16 15/1 26/25 34/1 51/13 51/24 53/14 56/2 63/20 69/25 79/11 79/12 79/15 80/16 107/14 122/24 138/9 sufficient [3] 2/17 3/5 155/2 suggest [3] 3/18 69/5 71/19 suggestions [1]	114/5 suggestive [2] 56/15 56/20 summarise [1] 54/6 summary [1] 24/12 sun [1] 148/6 Sunday [1] 100/11 supervising [2] 119/4 119/6 supplied [2] 27/10 98/8 supplier [1] 153/3 support [6] 14/8 14/18 29/22 29/22 44/24 91/8 suppose [1] 70/23 supposed [3] 28/16 114/16 115/25 sure [5] 17/12 32/18 88/24 105/10 130/5 surprising [1] 92/16 Surprisingly [1] 92/2 surround [1] 9/25 surrounding [1] 11/2 suspect [1] 11/8 suspected [5] 1/14 7/3 8/17 9/2 10/25 suspicious [2] 99/25 100/2 swift [1] 110/10 system [68] 7/17 19/10 19/16 19/17 26/25 27/1 27/3 27/4 27/6 28/9 29/9 29/17 32/15 35/6 35/16 37/5 39/19 40/3 41/17 43/7 44/9 44/11 49/20 49/20 50/3 50/12 50/15 50/24 53/19 55/12 55/14 58/6 59/11 59/16 60/21 63/1 66/19 72/2 73/17 77/21 79/14 80/9 82/17 83/18 91/25 94/17 97/11 97/16 97/18 98/12 107/4 109/18 129/19 130/21 141/6 146/16 146/17 147/5 148/15 148/16 148/17 148/18 148/20 150/9 150/12 150/14 152/5 156/3 systems [6] 36/19 44/15 44/16 45/1 45/14 106/8
				T tab [1] 6/21 tailor [1] 35/6 tailor-made [1] 35/6 take [21] 3/19 5/11 20/10 28/21 29/4 36/17 51/3 52/1 56/1 62/10 67/4 80/5 104/3

T	68/16 117/14	156/13 157/16 157/20	14/24 17/15 21/25	46/3 48/4 48/7 50/11
take... [8] 119/19	testing [1] 78/7	158/20 159/16	22/8 24/2 24/10 29/16	58/15 62/19 68/1
121/8 125/18 131/17	text [1] 93/20	theft [1] 66/21	33/6 34/7 38/21 40/15	69/20 74/25 76/2 84/2
132/5 132/18 143/3	than [26] 7/25 15/6	their [31] 11/8 17/10	40/17 42/5 42/6 43/13	87/21 91/15 103/20
158/9	18/9 33/19 47/2 48/24	17/18 17/18 17/19	45/8 45/17 45/25	108/3 109/18 110/13
taken [4] 33/5 96/18	51/17 59/12 63/12	20/15 20/23 21/21	45/25 48/19 49/15	110/13 113/6 113/18
110/21 131/23	63/18 71/24 73/19	21/21 22/17 23/3	50/16 52/5 54/12	114/5 114/25 126/7
taking [1] 88/13	85/20 87/15 88/11	25/10 25/13 26/7 26/7	55/17 58/7 61/8 62/2	127/6 127/7 127/8
talk [1] 47/20	89/5 108/8 110/22	26/8 29/7 29/10 31/13	68/5 69/5 69/25 72/7	127/9 142/24 149/6
talking [12] 8/2 10/2	138/14 139/5 146/20	31/21 31/21 32/8	76/15 76/23 80/19	151/2 151/5
21/11 21/14 32/1 47/2	147/3 148/16 148/22	87/22 116/7 123/25	81/15 82/16 83/3 83/3	they're [9] 13/20 66/5
47/15 47/16 47/17	149/20 151/7	124/17 127/11 134/12	83/10 83/11 83/13	75/10 76/21 84/2
47/20 48/3 119/14	thank [39] 1/7 1/8 3/1	150/7 151/6 154/20	83/15 84/20 91/1 91/2	108/3 110/25 112/18
task [2] 16/23 26/8	3/2 6/7 15/8 22/4	theirs [1] 45/18	91/13 91/17 92/12	149/7
Tatford [25] 32/3	36/12 52/11 52/19	them [30] 7/23 15/20	94/1 94/16 95/2 96/1	they've [3] 29/8
63/1 65/16 67/3 70/7	52/22 54/14 54/15	15/20 15/22 31/16	96/8 97/10 97/15	118/24 118/25
71/5 73/25 75/8 82/20	65/14 81/5 90/24	31/22 32/9 32/12	97/18 98/18 102/25	thing [15] 9/21 10/3
83/22 85/8 93/2 93/13	92/25 94/1 101/14	45/12 45/15 48/11	104/1 106/23 107/3	12/3 15/18 46/8 47/20
93/16 95/2 97/23	103/17 109/12 111/8	51/21 69/20 80/9	107/8 107/12 107/22	60/4 69/18 74/18 83/5
114/6 114/7 123/13	111/14 111/15 123/1	93/12 93/17 93/20	108/5 109/8 109/21	83/21 98/7 101/4
127/5 132/12 133/9	128/2 128/8 129/9	94/10 94/10 96/21	110/3 113/14 114/2	124/24 132/9
137/22 143/17 144/8	136/23 137/3 137/6	108/20 122/9 125/12	114/14 115/17 115/19	things [18] 10/2
Tatford's [4] 67/4	137/6 137/11 147/8	125/14 125/15 127/14	117/4 120/15 125/1	10/18 11/9 11/15
72/24 82/12 129/17	147/16 156/11 157/19	130/6 133/14 144/11	127/23 130/20 131/1	15/19 39/24 46/10
team [23] 13/19 14/1	159/12 159/19	151/6	131/6 131/7 131/17	74/1 84/2 92/11 110/1
14/7 23/25 24/1 36/8	that [673]	themselves [5] 15/13	132/24 133/4 134/6	120/1 125/8 125/16
36/15 64/24 65/4 69/9	that I [5] 86/22	16/3 16/7 17/16 17/24	135/10 137/4 138/23	141/20 143/17 146/11
69/11 69/14 79/6	106/18 120/20 124/23	then [102] 2/22 3/10	143/21 146/21 146/25	150/5
105/7 119/8 131/20	149/19	5/14 7/22 8/8 8/11	147/21 149/19 152/2	think [188]
132/3 135/2 141/1	that's [122] 2/5 4/9	9/15 12/3 12/24 14/13	156/1 158/7	thinking [10] 13/24
141/9 143/8 143/18	4/24 6/3 8/23 10/7	15/19 19/19 23/8 23/9	there's [29] 2/22 4/1	39/6 55/4 74/17 129/1
156/10	10/10 13/14 15/24	23/16 23/21 23/22	4/2 7/8 10/9 30/18	131/4 135/15 135/16
technical [6] 32/16	20/10 20/13 24/6 24/8	24/3 24/7 24/19 25/18	34/20 48/4 53/14 62/4	136/5 140/12
38/1 78/14 78/20	25/4 27/4 29/6 29/20	30/25 34/4 34/6 38/4	66/14 71/23 73/14	thinks [1] 74/10
101/18 156/4	30/3 30/17 33/8 33/16	39/5 39/8 40/12 41/15	89/23 92/10 92/14	third [20] 71/5 75/24
technology [1] 156/5	35/9 35/10 37/20	43/3 44/3 49/5 49/17	100/16 106/8 108/15	82/14 85/16 85/17
telephone [2] 89/13	38/16 40/21 43/7 45/7	50/18 50/24 51/18	109/25 109/25 110/1	86/5 86/8 86/9 87/2
127/4	45/10 50/13 51/4 51/6	51/19 52/4 53/5 56/6	111/1 115/21 120/23	87/3 87/4 99/8 101/17
telephoned [1] 82/1	52/10 55/6 55/19	57/20 62/13 64/24	133/2 134/25 142/25	105/16 118/23 123/19
tell [25] 12/23 13/16	55/24 57/7 59/2 59/14	65/15 66/11 66/12	145/13	133/3 133/10 139/11
33/23 34/9 46/2 57/11	59/21 60/10 60/11	66/13 66/16 67/24	therefore [4] 26/9	140/25
62/11 68/22 70/2	60/16 61/4 61/4 62/6	68/4 68/17 69/14	27/19 51/14 110/11	third-party [1] 85/16
70/17 74/13 74/22	64/21 68/15 70/14	71/20 71/23 73/25	these [42] 4/11 4/24	Thirdly [1] 16/12
80/1 85/23 87/13	70/14 70/15 72/2 72/2	76/7 78/9 78/9 79/23	18/5 18/8 18/12 26/6	this [212]
100/1 100/3 118/21	72/10 72/10 73/11	82/14 83/2 86/11	29/11 32/13 33/23	Thomas [11] 44/23
125/17 137/12 138/25	73/11 73/11 74/13	86/23 87/13 89/1 89/2	35/20 35/23 36/16	45/7 71/14 75/17 81/6
149/2 149/21 152/1	75/6 75/6 76/13 76/17	93/25 94/25 95/1	40/4 43/14 44/10	90/8 94/8 95/14 99/4
159/4	77/6 78/22 79/3 80/3	95/19 96/21 98/25	48/13 54/5 59/18	130/4 139/8
telling [8] 37/21 59/6	81/24 82/20 83/25	101/4 102/14 104/21	61/21 65/6 65/8 71/4	those [25] 4/4 11/9
61/1 74/4 94/20	85/3 87/24 88/23 89/3	104/23 105/8 106/14	72/9 74/1 80/10 91/19	16/13 17/9 18/14 38/9
119/17 121/1 151/8	90/5 90/20 92/15	106/25 107/11 108/19	95/6 96/10 97/6 98/24	38/13 58/14 68/19
tells [2] 151/20	92/21 96/23 97/5 99/8	111/3 111/6 112/23	103/10 104/2 107/17	92/13 112/21 114/8
151/23	100/19 101/16 103/3	112/23 115/10 117/17	116/10 127/9 131/23	117/12 117/19 120/11
ten [1] 65/11	105/2 109/8 109/8	121/12 126/15 130/7	142/18 143/16 149/5	124/23 125/16 136/15
tended [1] 69/5	115/18 115/25 116/17	130/14 133/17 134/13	150/6 150/22 156/1	142/6 144/17 146/9
tends [1] 3/17	116/22 117/14 118/19	134/16 140/2 151/1	they [59] 9/18 12/15	150/5 154/14 158/19
terminology [1] 56/5	120/18 124/6 124/11	151/25 152/9 153/14	12/25 13/4 13/4 13/17	158/21
terms [14] 3/25 4/16	125/5 126/12 127/18	154/12 155/10 159/18	13/21 13/21 14/18	though [1] 146/5
16/10 19/25 21/14	129/6 131/22 134/10	theories [1] 77/24	16/2 16/16 16/19	thought [4] 12/23
23/8 23/20 25/18 36/5	135/20 137/9 137/9	there [116] 2/16 3/5	16/21 17/12 17/17	21/1 102/8 156/17
45/24 60/17 135/16	139/10 140/19 141/24	3/15 4/12 4/23 5/2	17/19 20/6 21/23	thoughts [1] 55/16
135/16 138/21	143/11 144/22 145/10	5/18 5/23 7/2 7/23 8/9	22/16 23/4 29/10	three [4] 11/9 29/1
test [4] 7/21 8/8	145/13 152/14 155/15	8/15 8/19 9/17 11/4	29/10 29/23 31/7	102/11 119/25
	156/6 156/8 156/10	12/13 13/6 13/8 13/12	36/15 45/3 45/4 45/13	through [24] 4/10 8/7

T	too [7] 15/3 36/20 45/1 63/22 135/21 140/10 142/18	100/4 104/15 108/16 138/9 142/6 145/10 147/22 148/20	155/7 156/3	usual [2] 32/7 63/16
through... [22] 13/12 30/4 32/8 32/11 32/20 33/21 41/11 61/24 62/1 62/19 78/1 106/2 112/21 114/3 117/6 127/21 133/12 137/20 141/5 151/19 157/23 158/5	took [9] 72/4 72/6 119/11 119/18 119/22 120/25 122/20 132/1 132/23	Tuesday [3] 159/13 159/16 159/22	understanding [3] 27/3 34/22 79/10	V
throughout [3] 40/11 58/18 61/20	top [1] 121/10	turn [15] 2/24 14/8 14/18 28/6 29/10 29/14 37/22 39/25 52/24 62/13 71/4 102/17 103/5 111/17 151/10	understood [8] 17/12 17/17 26/1 26/7 34/22 45/3 48/25 49/12	various [2] 143/2 143/3
ticking [1] 26/4	topic [3] 19/21 20/13 23/11	turned [2] 84/16 87/20	undertake [1] 16/22	vast [1] 20/15
tie [1] 74/11	topics [1] 12/22	turning [2] 69/2 77/15	undertaken [1] 154/2	versa [1] 120/17
time [103] 3/22 5/15 6/4 6/8 7/16 8/12 11/12 13/6 13/16 14/12 14/21 20/11 22/13 22/19 22/24 26/1 28/25 29/18 29/20 29/24 30/21 34/2 35/3 35/17 40/23 43/11 45/8 47/15 47/17 48/9 48/20 51/25 53/14 54/1 54/1 54/4 59/8 59/10 63/20 64/7 74/16 75/21 78/16 79/22 80/16 80/16 84/3 84/8 85/15 85/24 86/15 87/14 88/25 89/25 96/6 96/8 96/11 102/9 102/9 102/12 103/24 113/3 120/10 122/22 122/24 124/3 124/8 124/19 126/21 126/24 127/19 129/2 131/4 132/1 135/16 135/19 136/15 137/7 137/8 138/9 139/3 140/11 140/16 140/24 141/4 143/11 144/14 145/15 145/21 146/1 146/7 146/9 146/23 148/5 149/16 149/17 149/18 152/6 155/5 156/19 156/23 157/8 158/9	total [1] 153/15	two [20] 29/1 39/11 40/4 43/17 45/19 54/25 58/24 61/21 71/4 75/20 93/23 102/11 111/4 116/3 124/23 126/15 126/19 145/11 146/7 147/16	university [1] 50/11	version [2] 113/19 122/6
times [2] 17/23 32/13	touch [2] 29/21 148/4	two paragraphs [1] 124/23	unless [1] 144/25	versions [1] 144/20
timetable [3] 46/10 47/5 47/23	track [1] 62/19	two years [1] 54/25	unmanageable [1] 138/12	very [44] 1/8 19/16 19/16 19/16 20/8 20/14 20/17 23/16 32/10 34/10 35/5 35/5 35/5 38/24 40/23 41/8 42/2 43/24 44/9 44/10 44/10 49/19 51/10 51/22 52/10 52/10 52/22 58/19 59/11 102/11 102/12 106/4 108/22 108/25 109/12 109/12 111/8 114/3 129/9 134/19 141/25 156/6 156/14 156/14
timing [2] 71/23 101/21	trained [2] 13/4 17/10	two-person [1] 116/3	unnecessarily [1] 65/20	via [2] 79/6 134/2
today [4] 81/7 110/5 133/15 140/23	trainings [1] 12/15	type [1] 134/21	unnecessary [3] 66/3 66/25 73/25	vice [1] 120/17
together [11] 41/1 96/8 114/19 120/9 121/12 121/15 131/19 141/8 145/11 149/6 149/7	transaction [8] 39/23 91/21 92/14 103/11 106/22 107/13 107/16 153/22	types [2] 65/1 78/1	unorthodox [1] 134/10	view [14] 28/14 31/5 43/12 46/6 46/6 46/7 65/20 106/24 147/19 148/1 148/6 148/15 154/1 154/4
told [9] 12/7 25/23 32/2 36/16 43/22 51/10 51/13 138/23 143/18	transactions [10] 78/2 91/22 92/1 102/8 107/9 130/10 131/7 132/7 137/21 138/25	typing [1] 112/3	unreasonable [3] 66/3 66/24 73/24	viewed [1] 55/13
tongue [1] 21/25	translated [1] 83/25	U	unreasonably [1] 65/20	viewing [2] 56/15 56/20
	transpired [1] 85/2	um [3] 79/1 79/3 79/3	unspecified [1] 65/9	visualised [1] 40/17
	treat [7] 19/5 38/10 40/13 42/21 48/2 48/16 61/19	unable [3] 51/13 119/1 126/8	until [11] 8/3 28/23 110/7 110/12 110/14 111/3 111/4 119/22 154/10 154/17 159/21	volume [2] 133/21 137/16
	treated [12] 19/22 33/15 38/8 38/14 41/10 43/6 46/17 47/8 54/10 61/9 61/13 123/4	unbiased [1] 25/12	unused [10] 111/19 111/25 112/17 113/10 113/17 119/2 120/4 120/7 121/23 133/2	W
	treating [8] 43/4 47/11 53/11 58/17 64/1 124/9 124/19 125/3	uncomfortable [1] 156/7	unusual [2] 33/20 38/5	wait [1] 33/10
	treatment [4] 41/25 42/11 58/12 96/25	under [19] 3/3 15/12 16/1 16/12 16/19 16/25 17/6 17/23 51/5 51/5 56/8 68/9 77/21 78/9 87/5 113/15 113/16 113/16 158/13	up [40] 1/11 2/10 24/20 25/6 30/15 31/7 41/11 50/8 51/23 60/11 61/5 61/11 61/14 64/24 65/9 65/15 66/23 74/11 79/23 83/2 86/16 90/9 90/19 93/25 95/1 104/21 112/20 120/10 120/16 120/21 123/20 129/5 129/10 130/14 143/3 147/11 148/19 150/7 156/25 157/4	walked [1] 146/15
	trial [14] 29/2 31/22 32/22 33/14 41/11 117/15 120/14 120/14 121/14 126/16 128/10 148/7 152/3 152/10	undergone [1] 78/7	upon [9] 3/21 17/1 23/2 26/17 27/10 28/12 82/9 135/11 136/13	want [9] 32/19 77/22 77/24 99/22 101/10 104/6 108/24 109/13 111/5
	trials [1] 31/24	underline [1] 117/13	urgent [1] 95/22	wanted [5] 30/16 48/7 137/4 149/6 151/5
	tried [1] 103/23	underlying [10] 101/20 102/19 102/22 103/11 104/9 105/17 105/20 106/22 107/11 153/22	us [20] 13/4 14/22 32/2 52/18 59/6 62/7 67/25 75/9 76/1 76/20 92/1 102/7 119/17 121/1 137/2 143/18 147/2 151/20 151/23 152/1	wanting [1] 141/23
	true [7] 40/22 41/6 55/19 55/22 58/21 61/3 155/16	undermine [1] 18/1	used [7] 14/23 20/15 24/23 45/15 56/10 56/14 56/19	wants [1] 65/18
	trust [3] 3/10 4/2 8/12	undermined [1] 121/6		warning [1] 134/14
	try [4] 44/5 75/20 75/21 140/7	undermines [1] 68/14		Warwick [15] 32/3 63/1 65/16 72/24 93/2 93/5 97/23 114/6 123/13 127/4 132/12 133/9 137/22 143/17 144/8
	trying [21] 15/2 18/17 22/18 32/15 35/3 41/9 45/12 46/5 46/7 54/6 79/19 86/25 96/7	underneath [1] 115/18		was [352]

W	51/8 51/18 51/19 52/1 53/14 55/21 55/21 55/23 57/9 58/19 59/11 60/7 62/9 67/22 70/14 74/18 74/20 78/22 81/1 82/13 83/17 83/21 87/24 88/7 88/9 88/24 93/12 98/18 99/13 99/14 100/2 100/19 102/24 104/13 105/22 107/20 108/9 108/17 115/6 115/6 117/2 121/2 124/6 126/20 127/18 128/19 128/21 133/19 134/6 134/10 134/13 134/18 135/20 137/14 141/7 142/22 142/22 142/25 145/10 145/23 146/13 146/13 146/24 148/13 149/12 150/11 151/4 152/21 157/15 158/10 158/20	weren't [5] 26/4 45/11 74/8 77/1 100/18 West [4] 91/22 107/15 153/18 154/2 West Byfleet [4] 91/22 107/15 153/18 154/2 what [220] what's [10] 2/5 49/6 76/11 80/7 80/9 89/6 128/23 136/15 157/9 157/17 whatever [8] 28/18 49/17 82/9 86/14 100/22 100/25 132/9 146/3 when [54] 1/25 6/16 8/16 15/4 18/15 23/21 25/23 25/24 29/20 33/6 38/21 42/14 42/21 45/4 45/7 45/8 45/11 46/14 47/23 48/10 48/13 49/20 51/4 51/6 54/4 56/6 59/1 59/21 60/13 62/9 67/3 67/12 71/4 82/15 84/11 86/4 89/7 89/20 94/15 107/10 110/14 116/13 118/7 118/8 118/10 119/18 119/19 124/22 128/21 130/18 130/23 156/19 158/16 159/5 Whenever [1] 107/13 where [48] 1/11 4/12 7/10 12/19 22/10 24/10 25/15 32/25 33/8 35/9 35/10 40/2 40/18 40/22 43/13 48/4 48/23 50/2 50/13 53/7 61/25 62/25 74/1 74/16 78/2 86/3 90/3 91/14 95/5 105/2 106/5 107/8 113/18 115/23 117/20 120/11 126/18 129/10 130/8 130/9 131/7 132/1 135/4 139/3 145/12 145/15 149/14 152/14 whereby [2] 40/19 105/4 whether [74] 1/23 3/18 4/25 5/8 5/11 6/3 6/18 7/7 7/13 9/2 11/6 11/6 12/25 13/3 13/7 13/9 13/11 13/21 14/24 19/22 20/20 21/16 22/8 26/6 30/5 30/24 35/12 36/15 40/7 49/22 55/12 62/4 64/15 65/2 68/1 69/20 69/24 69/25 72/16 75/10 76/2 76/21	82/16 84/11 84/17 84/23 87/18 88/8 92/9 93/8 94/16 95/25 97/10 97/17 97/24 101/3 106/23 107/3 108/5 110/3 112/16 114/21 115/22 115/23 116/25 121/15 122/23 130/20 130/25 132/15 134/24 134/24 148/3 158/2 which [69] 1/12 3/15 4/5 8/15 10/4 11/21 12/24 14/25 15/20 15/21 17/1 17/2 17/3 17/25 17/25 18/18 21/18 23/3 23/6 23/14 28/1 28/12 29/24 32/4 34/21 35/7 43/14 51/17 53/15 53/19 55/8 58/24 65/19 67/7 68/9 73/2 73/15 85/8 87/23 90/24 94/5 95/18 96/2 103/4 107/4 107/23 114/3 117/25 118/23 118/24 118/25 122/5 123/3 123/7 125/19 130/12 130/24 132/6 136/11 136/13 137/20 143/4 145/23 147/5 151/20 151/23 152/12 154/15 158/20 while [2] 56/7 132/4 whilst [3] 26/13 113/8 119/11 white [2] 58/25 127/24 who [77] 2/11 7/13 13/20 13/24 14/3 14/8 17/9 19/8 19/14 19/15 26/24 27/6 28/5 30/2 31/6 31/15 34/11 37/1 37/4 38/1 39/20 41/15 41/16 41/17 43/6 43/18 44/5 44/6 44/9 44/9 44/11 44/24 46/19 48/22 49/19 49/20 50/6 50/15 50/23 51/1 53/18 53/18 54/12 59/11 63/12 64/11 72/8 73/16 78/25 79/7 79/8 79/12 90/17 91/3 91/6 91/18 92/13 104/14 109/9 110/8 111/21 114/10 115/21 119/3 119/5 119/7 119/9 120/13 126/12 132/3 141/7 141/9 142/16 142/16 153/17 158/21 158/22 who's [2] 43/3 105/8 whoever [1] 14/19	whole [12] 9/12 15/18 28/17 55/11 55/25 117/2 131/14 135/2 144/25 150/9 150/12 150/14 whom [2] 14/6 43/17 why [51] 2/2 4/11 20/14 27/4 34/8 48/18 53/12 54/8 56/3 57/8 58/1 58/22 58/24 59/18 60/2 60/12 60/16 61/4 61/4 61/4 61/14 63/11 66/2 66/23 71/24 77/4 77/6 77/22 80/3 90/13 90/21 100/3 102/22 104/11 105/12 118/4 118/6 118/19 120/18 125/16 131/22 135/8 135/24 137/18 138/25 140/21 141/6 143/12 150/5 156/6 156/8 wide [1] 34/12 wider [1] 65/23 will [34] 3/11 3/16 4/6 5/9 51/20 52/3 68/5 77/24 77/25 78/4 78/15 91/5 91/6 91/13 91/17 95/6 95/8 106/19 110/19 111/6 134/16 135/13 135/13 136/19 143/1 143/13 150/17 158/8 158/11 159/2 159/3 159/5 159/6 159/10 Wilson [3] 50/4 64/17 122/9 wish [4] 67/9 110/14 127/8 135/24 within [22] 16/13 23/7 23/24 24/14 25/13 26/12 29/20 36/7 36/7 68/19 69/3 69/4 69/6 69/24 87/7 92/5 92/12 97/17 103/1 103/6 104/19 129/19 without [7] 8/10 72/13 76/25 77/4 102/4 103/11 123/22 witness [84] 15/10 16/2 19/4 26/17 27/7 28/3 28/20 28/21 29/4 31/17 31/19 32/21 33/16 33/17 33/19 33/21 34/3 36/10 37/4 37/7 37/14 38/1 38/7 38/11 39/3 39/11 40/7 40/8 40/10 40/14 41/10 43/2 43/3 43/18 52/24 53/12 53/18 54/5 54/10 54/13 56/11 56/16 56/21 57/1 58/13 58/17
----------	--	--	--	---

<p>W</p> <p>witness... [38] 60/10 60/13 60/22 60/25 61/2 61/7 61/20 62/18 63/3 63/5 64/3 71/19 72/6 81/23 83/8 87/22 88/6 89/15 102/15 113/5 113/11 113/18 122/4 124/22 128/23 129/25 130/6 139/9 140/4 144/6 144/7 144/19 145/20 146/7 146/9 147/16 157/25 158/17</p> <p>witness's [1] 32/11</p> <p>witnesses [6] 31/20 32/7 79/16 128/18 134/11 158/21</p> <p>won't [1] 5/22</p> <p>wonder [1] 110/3</p> <p>word [5] 41/7 56/12 57/7 83/1 83/1</p> <p>wording [2] 56/5 56/6</p> <p>words [5] 38/25 41/9 85/21 116/2 136/15</p> <p>work [21] 17/18 18/14 27/25 30/8 30/10 30/12 31/4 36/4 51/22 64/23 74/12 91/19 92/13 99/19 99/20 114/16 117/20 138/11 141/21 145/11 146/2</p> <p>worked [6] 23/22 27/3 29/6 48/22 73/18 157/17</p> <p>working [9] 2/3 131/15 131/18 131/24 132/3 137/25 141/13 154/2 157/14</p> <p>workings [2] 19/9 39/22</p> <p>works [3] 67/19 99/23 106/3</p> <p>world [4] 11/21 41/18 46/7 46/19</p> <p>worried [2] 36/18 44/25</p> <p>would [171]</p> <p>wouldn't [16] 4/8 5/17 9/11 24/16 32/22 45/23 79/4 79/4 80/18 80/25 99/15 100/9 109/14 125/2 131/22 155/16</p> <p>wrap [1] 64/24</p> <p>writing [5] 36/17 46/1 56/8 96/21 147/15</p> <p>written [6] 12/6 13/9 16/9 18/9 26/5 144/21</p> <p>wrong [4] 42/17 44/19 57/7 58/3</p>	<p>Wylie [1] 55/6</p> <p>Y</p> <p>yeah [38] 8/14 9/7 12/2 12/4 21/1 27/14 34/10 37/17 39/15 46/13 54/12 55/2 59/8 76/15 76/16 76/18 81/17 81/17 82/13 83/15 92/21 93/24 93/24 97/7 100/6 105/19 107/20 107/25 114/17 118/15 119/24 122/7 122/7 124/21 125/15 126/20 143/7 146/6</p> <p>year [11] 6/17 12/20 22/19 49/24 65/11 110/15 110/19 111/7 132/1 145/2 159/11</p> <p>years [26] 10/16 10/17 10/17 49/14 54/25 58/4 67/2 68/22 68/24 70/3 71/1 78/5 79/19 85/10 85/11 87/12 88/1 96/14 98/9 100/3 103/24 108/12 134/20 141/19 142/11 144/2</p> <p>yes [205]</p> <p>yesterday [7] 1/11 7/1 45/11 82/1 103/3 104/20 117/7</p> <p>yet [4] 21/11 33/7 151/2 154/21</p> <p>you [734]</p> <p>you'd [4] 15/19 19/17 36/1 138/23</p> <p>You'll [3] 75/8 115/16 126/2</p> <p>you're [52] 2/3 2/5 2/6 10/2 15/17 21/14 23/19 30/17 30/23 31/1 33/8 37/12 37/16 38/24 40/4 49/13 53/1 54/18 56/6 56/7 61/2 61/6 61/7 63/22 64/5 72/12 72/19 73/8 74/24 79/17 81/1 86/14 93/16 93/17 93/20 96/12 96/14 99/10 106/10 107/24 119/14 119/17 121/1 134/19 146/7 147/14 147/23 149/2 149/16 152/24 156/24 156/25</p> <p>you've [32] 5/18 6/14 10/19 15/16 19/3 29/23 32/2 48/7 51/5 51/17 58/16 60/22 61/16 61/21 84/8 88/2 96/21 97/15 97/16 105/5 105/8 108/13 127/15 132/9 132/10</p>	<p>138/5 140/25 141/1 143/18 144/11 146/21 147/24</p> <p>your [62] 2/12 5/8 5/10 12/20 18/14 30/13 31/5 31/8 34/22 36/10 39/3 39/11 43/16 52/2 52/24 54/9 55/3 55/15 57/21 60/25 65/5 72/13 76/25 77/4 77/8 77/23 77/25 78/3 79/10 79/11 80/6 80/14 85/12 89/10 89/19 90/9 90/24 92/23 93/1 93/1 93/7 95/22 96/25 114/3 122/8 124/22 126/3 126/17 127/3 127/15 129/7 132/9 132/12 133/8 134/15 134/23 136/20 147/17 159/6 159/7 159/8 159/9</p> <p>yourself [5] 20/20 66/12 66/13 74/9 130/13</p> <p>yourselves [1] 65/7</p>		
---	--	---	--	--