

Wednesday, 20 December 2023

1
2 (10.00 am)
3 **MS PRICE:** Good morning, sir. Can you see and hear
4 us?
5 **SIR WYN WILLIAMS:** I can. Thank you very much.
6 **MS PRICE:** May we please call Ms Allen.
7 **SIR WYN WILLIAMS:** Yes.
8 **LISA JANE ALLEN (affirmed)**
9 **Questioned by MS PRICE**
10 **MS PRICE:** Could you confirm your full name, please,
11 Ms Allen.
12 **A.** Lisa Jane Allen.
13 **Q.** You should have in front of you a hard copy of
14 a witness statement in your name dated
15 27 October 2023. If you could turn to page 33
16 of that, please.
17 **A.** Yes, that's it.
18 **Q.** Do you have a copy with a visible signature?
19 **A.** I do.
20 **Q.** Is that your signature?
21 **A.** Yes, it is.
22 **Q.** At the time you made your statement, there were
23 three documents which were referenced in the
24 request for a statement sent to you by the
25 Inquiry, but had not been provided to you. They

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1 a Postal Officer working within the Crown Office
2 Network; is that right?
3 **A.** That's correct.
4 **Q.** In April 1995 you became an Assistant Branch
5 Manager?
6 **A.** That's correct.
7 **Q.** With the exception of a short secondment
8 providing administrative support to Retail Line
9 Managers, you stayed in that role until July
10 2000; is that right?
11 **A.** That's correct.
12 **Q.** At which point you joined the Security Team as
13 an Investigation Manager?
14 **A.** I did.
15 **Q.** Is it right that that role involved
16 investigating criminal offences against the
17 business and its assets?
18 **A.** Yes.
19 **Q.** You explain that your role was at one point
20 a multi-skilled role, whereby you did some
21 physical security work.
22 **A.** That's right.
23 **Q.** Physical security work related to advising on
24 external crime risk from threats such as
25 burglary and robbery; is that right?

3

1 are the three document references marked in red
2 in your statement. I understand these three
3 documents have since been provided to you; is
4 that right?
5 **A.** That's correct.
6 **Q.** Are there any corrections you wish to make to
7 your statement, having had sight of those
8 documents?
9 **A.** No.
10 **Q.** Are there any corrections you wish to make to
11 your statement in light of your consideration of
12 other documents provided by the Inquiry since
13 the making of your statement?
14 **A.** No.
15 **Q.** Are the contents of your statement true to the
16 best of your knowledge and belief?
17 **A.** They are.
18 **Q.** For the purposes of the transcript, the document
19 reference for the statement is WITN08920100.
20 Thank you for coming to the Inquiry to
21 assist it in its work and for providing the
22 witness statement that you have. As you know,
23 I will be asking questions on behalf of the
24 Inquiry.
25 You joined the Post Office in 1986 as

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1 **A.** Yes.
2 **Q.** But the role went back to being a purely
3 investigative one by the time you left the Post
4 Office in April 2012?
5 **A.** Yes.
6 **Q.** In April 2012, you transferred to the Royal Mail
7 Investigation Team where you remain employed; is
8 that right?
9 **A.** Yes.
10 **Q.** You say in your statement at paragraph 4 that,
11 when you were first working on the counter in
12 Post Office branches, balancing of stock units
13 was done on a weekly basis and was completed
14 manually by producing a balance sheet of
15 summarised daily and weekly transactions, but in
16 August 1992 you transferred to a branch where
17 a computerised system had already been
18 implemented; is that right?
19 **A.** Yes.
20 **Q.** What were the systems that you used between
21 August 1992 and July 2000 when you became
22 an Investigation Manager?
23 **A.** Sorry, what systems I used?
24 **Q.** You talked about computerised systems that you
25 were using from 1992 --

4

1 A. Oh, sorry --
 2 Q. -- in your statement. What were those
 3 computerised systems?
 4 A. There was ECCO and ALPS, which I think stood for
 5 "All London Post Offices".
 6 Q. How did the use of those computer systems change
 7 the process for balancing?
 8 A. It was basically -- it was computerised, so
 9 where you would manually write down deposits and
 10 things on manual sheets, the computer would
 11 print them all out for you, so you would enter
 12 it onto the computer and, at the end of the day,
 13 you would run off a summary, as opposed to
 14 manually add a summary up.
 15 Q. Did you ever work on the counter in a branch
 16 where the Horizon system was being rolled out?
 17 A. No.
 18 Q. When you were working on the counter, did you
 19 know anyone who worked in a branch where Horizon
 20 was being rolled out?
 21 A. I was -- I had friends in the post offices that
 22 worked with the Horizon system.
 23 Q. But at the stage in 2000, before you became
 24 an Investigation Manager, did you know anyone
 25 who was in a branch where the Horizon system was

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1 counters; is that right?
 2 A. Yes.
 3 Q. You say in your statement at paragraph 11 that
 4 when you began your role as an Investigation
 5 Manager, you completed a three-week residential
 6 training course?
 7 A. I did.
 8 Q. Was that for both Post Office and Royal Mail
 9 Investigators?
 10 A. Yes, it was a joint course run for new recruits
 11 at that time.
 12 Q. You describe the people who delivered the
 13 training in your statement as being members of
 14 the Royal Mail training team. Michael Matthews
 15 is one of those people. Was the training team
 16 made up of Royal Mail, as opposed to Post
 17 Office, Investigators?
 18 A. The training was delivered by Royal Mail
 19 trainers, yes.
 20 Q. You recall sitting an exam at the end of the
 21 course; is that right?
 22 A. Yes.
 23 Q. You set out a non-exhaustive list of the topics
 24 that training covered at paragraph 13 of your
 25 statement. That list includes: commencement of

7

1 being rolled out?
 2 A. I wasn't aware of anyone, no.
 3 Q. Were you aware of any Post Office staff or
 4 subpostmasters experiencing difficulties in
 5 using the Horizon system when it was first
 6 introduced?
 7 A. I wasn't, no.
 8 Q. Were you aware of any Post Office staff or
 9 subpostmasters feeling that their training on
 10 the Horizon system was insufficient?
 11 A. I don't recall, no.
 12 Q. Were you made aware of any such issues when you
 13 were an Investigation Manager, about the rollout
 14 period?
 15 A. I don't recall the rollout period, so I'd have
 16 to say no.
 17 Q. When you became an Investigation Manager, did
 18 you have any prior experience in criminal
 19 investigation or criminal law?
 20 A. No, I never.
 21 Q. In terms of process, you applied for
 22 an Investigator role within the Royal Mail
 23 business and when you were successful in your
 24 application you were allocated to Post Office
 25 Limited, based on your experience on post office

6

1 an investigation; approaching suspects;
 2 interviewing; searches; statement taking; the
 3 completion of Royal Mail forms; the Police and
 4 Criminal Evidence Act; definition of offences;
 5 report writing; and notebook entries. Have you
 6 listed those topics because you recall them
 7 featuring on the course?
 8 A. Yes, I think so.
 9 Q. Do you recall the topic of disclosure in
 10 criminal prosecutions being covered on that
 11 initial three-week course?
 12 A. No, I don't.
 13 Q. You do recall covering the Police and Criminal
 14 Evidence Act. Do you recall covering the
 15 Criminal Procedure and Investigations Act 1996
 16 on that initial course?
 17 A. I don't, no.
 18 Q. Do you recall covering the Code of Practice to
 19 that Act?
 20 A. No.
 21 Q. You say at paragraph 14 of your statement that
 22 you undertook a court workshop in March 2002 to
 23 understand the legal proceedings and guidance on
 24 giving evidence at court?
 25 A. Yes.

8

1 Q. You also recall human rights training?
 2 A. Yes.
 3 Q. You also refer at paragraph 15 of your statement
 4 to a financial investigation course you did in
 5 March 2011?
 6 A. That's correct.
 7 Q. Did you receive any refresher training on the
 8 conduct of criminal investigations between doing
 9 your initial training in 2000 and moving to
 10 Royal Mail in 2012?
 11 A. I don't recall any but that doesn't mean that we
 12 didn't have it. But I don't recall it.
 13 Q. Were you given any training on the Horizon
 14 system when you became an Investigation Manager?
 15 A. I was. I don't actually remember the training
 16 myself. I believe it would have been probably
 17 just one day, more for -- because I was
 18 obviously counter trained, I had the knowledge
 19 of performing transactions, which probably
 20 didn't vary very much from one computer system
 21 to the other, but obviously for -- maybe for
 22 balancing or other -- printing off other reports
 23 that I might not be aware of, I think I was
 24 given one day's training.
 25 Q. Were you ever given any training on Horizon from

9

1 A. Yeah.
 2 Q. Did you understand the Information Security
 3 strand to have knowledge of the Horizon system
 4 and any issues relating to it?
 5 A. I did not, no.
 6 Q. Did that team ever provide the Security
 7 Operations strand with any updates relating to
 8 the Horizon system?
 9 A. Not to my knowledge.
 10 Q. Did you have regular tact with anyone in the
 11 Information Security Team?
 12 A. We was all based within the same office, a big,
 13 large, open-planned office but we didn't really
 14 interact, as such, with them, no.
 15 Q. Who did you ask if you wanted information
 16 relating to the working of the Horizon system?
 17 A. We would go to the Casework Manager, who was
 18 a single point of contact, I suppose, for
 19 Fujitsu and I think they would approach Fujitsu
 20 requesting whatever information it was we was
 21 after.
 22 Q. You address the Security Operations strand at
 23 paragraph 28 of your statement. Could we have
 24 that on screen, please. It is page 10 of
 25 WITN08920100. You say at paragraph 28:

11

1 the point of view of an Investigator, looking at
 2 Horizon data in the course of an investigation?
 3 A. No.
 4 Q. When you became an Investigation Manager in
 5 2000, you recall that Tony Marsh was Head of
 6 Security for Post Office Limited; is that right?
 7 A. He was.
 8 Q. You recall that he was replaced by John Scott
 9 after a short period when Tony Utting was
 10 temporary Head of Security?
 11 A. Yes. Can I also add, in between Tony Marsh and
 12 Tony Utting there was also Phil Gerrish.
 13 Q. You identify at paragraph 27 of your statement
 14 five strands within the Security Team, which
 15 were Physical Security, Information Security,
 16 Commercial Security, Fraud risk and Security
 17 Operations.
 18 A. Yes.
 19 Q. Dealing first with the Information Security
 20 strand, you say at paragraph 27 that this team,
 21 headed up by Richard Barber, managed IT issues
 22 relating to systems in place at the Post Office
 23 and their compliance. You give an example of
 24 ensuring the systems were payment card industry
 25 compliant.

10

1 "When I joined the Security Team around
 2 July 2000, I believe there were 7 teams within
 3 this strand which I think was known as the
 4 Investigation Team. I believe the name changed
 5 to Security Operations upon John Scott heading
 6 up the Security Team. Each team consisted of
 7 around 6 Investigators and one team leader.
 8 Between 2000 and 2012 when I left the business,
 9 there had been numerous headcount reduction
 10 exercises. This reduced the teams over the
 11 years eventually to 3 teams with 3 team leaders
 12 and around 18 Investigators."

13 Could we have on screen, please, document
 14 reference POL00166566. This is an email from
 15 Tony Marsh, the Head of Security at the time.
 16 It is dated 17 October 2003. It goes to a long
 17 list of recipients, including you, if we can
 18 scroll down a little, please. We see, three
 19 lines up from the bottom, your name there as
 20 a recipient.

21 A. Yeah.
 22 Q. Going over the page, please. The body of the
 23 email starts towards the bottom of the page. It
 24 says this:

25 "Dear Colleague

12

1 "As you will be aware from recent
2 communications from both the Chief Executive,
3 David Mills and the personnel director, Ian
4 Anderson, Post Office Ltd must make further
5 headcount reductions to support Royal Mail Group
6 in its drive back to sustainable profitability.

7 "As part of this exercise the Security Team
8 was asked to review its structure and to
9 establish what further savings it could make and
10 what the impact of these would be on its key
11 customers and stakeholders.

12 "The Security Lead Team and I examined
13 a number of options and came to the conclusion
14 that the structure could be further streamlined
15 in the following ways ..."

16 The first two points are:

17 "Collapsing the Risk and Commercial Security
18 function into the Internal and External Crime
19 functions, thus saving a Senior Manager post.

20 "Removing the Training and Support Manager
21 role, formerly within the Risk and Commercial
22 Security area, with the remaining functions
23 taking direct responsibility for provision of
24 professional training and liaison with
25 communications, thus saving a CM1 post."

13

1 staff."

2 Is this one example of one of the numerous
3 headcount reduction exercises to which you refer
4 in your statement?

5 **A.** Yes, it is.

6 **Q.** What impact did the numerous headcount reduction
7 exercises have on the workload of Security
8 Operations Investigators?

9 **A.** I suppose there was less staff to do the same
10 amount of work. Maybe the trigger points may
11 have changed to reduce the amount of cases that
12 we would investigate but, obviously, we were
13 quite busy because the headcount was reducing.

14 **Q.** What impact, if any, did the numerous headcount
15 reduction exercises have on the quality of
16 security operations and investigations?

17 **A.** I'm not sure it would have had an effect on the
18 quality. Casework -- the cases should have been
19 going through a compliance check, so they should
20 have still met the standard. It was just we
21 were probably having more cases to deal with
22 than normally, possibly.

23 **Q.** Did your own workload ever prevent you from
24 following further lines of inquiry or gathering
25 further evidence in an investigation you were

15

1 Then there are two further cuts affecting
2 non-Internal Crime functions and, the fifth
3 bullet point, the following cut is identified,
4 "Removing the following support jobs", and among
5 those is Internal Crime two of the five --
6 apologies, two of the four, thus saving four
7 Post Office posts.

8 The remaining bullet points address the
9 collapsing of the Risk and Commercial Security
10 functions and, further down the page, some
11 changes affecting the Audit function are
12 discussed.

13 Over the page, please. The first paragraph
14 says this:

15 "There is no suggestion that any of the jobs
16 that have been removed were superfluous. Each
17 job added value to the team in its own way and
18 for each one the team will need to be open to
19 exploring different ways of working to absorb
20 the loss. We have calculated however that with
21 the removal of these jobs we can make savings
22 which will not immediately impact on the service
23 that we provide to our customers, primarily the
24 Retail and Cash Logistics frontline, Sales and
25 Marketing teams, subpostmasters and branch

14

1 conducting?

2 **A.** Not that I'm aware of.

3 **Q.** Do you recall there being any time frame within
4 which you were expected to produce your legal
5 report for the Criminal Law Team after a case
6 was allocated to you?

7 **A.** There probably was timescales but I don't recall
8 what those were.

9 **Q.** You say at paragraph 29 of your statement that
10 the Financial Investigation Team also sat within
11 the Security Operations strand; is that right?

12 **A.** They did, yes.

13 **Q.** Then at paragraph 30 of your statement, you
14 address the work of the Casework Team. Could we
15 have that on screen, please. That's page 10 of
16 the statement. You say, starting at
17 paragraph 30:

18 "Also within this strand was the Casework
19 Team, originally based in London. I can recall
20 Brian Sharkey, Graham Ward, Dave Posnett and
21 Jason Collins working within this unit at
22 various times, until it was relocated to
23 Manchester and Jane Owens became the manager
24 (date unknown).

25 "The London Casework Team managed the case

16

1 papers between the Investigator and the Legal
 2 Services. They were also responsible for
 3 amongst other things for compliance checks on
 4 the files, requesting Fujitsu data, dealing with
 5 Post Office Card Account enquiries and raising
 6 cases. This may be as a result of an audit
 7 shortage or if information had been received
 8 where suspected criminal offences had taken
 9 place.

10 "I cannot recall the responsibilities of
 11 Jane Owen once the Casework Team transferred
 12 other than being the Fujitsu liaison point and
 13 Post Office Card Account enquiries. I do not
 14 think she had the relevant experience to
 15 compliance check the case papers."

16 You refer here to the Casework Team being
 17 the Fujitsu liaison point. Is it right
 18 therefore that any request you made for Horizon
 19 data from Fujitsu went through this team?

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

21 **Q.** You address the process which was followed after
 22 an audit identified an apparent shortfall,
 23 starting at paragraph 40 of your statement.

24 Could we have that on screen, please. It is
 25 page 12. Do you say at paragraph 40:

17

1 statement. Intelligence gathered on the subject
 2 and a risk assessment performed should searches
 3 be required. Evidence collected to
 4 support/undermine the investigation by attending
 5 the office and retaining documentation.
 6 Consideration given to advising the Financial
 7 Investigators of the loss. Contact made with
 8 the subject either in person or on the phone
 9 seeking an explanation. Arrange interview under
 10 caution if suspected criminal offence."

11 When you refer here to attending the office
 12 and attaining documentation, are you referring
 13 to the Horizon reports which could be printed
 14 from the counter in the branch?

15 **A.** Yes, documents that are on hand that have
 16 already been printed or provided by the -- if it
 17 was an audit shortage, the Audit Team.

18 **Q.** So you were looking at the record of the cash and
 19 stock which the counter-printed Horizon reports
 20 said should be in the branch, against the record
 21 of what the Auditors had actually found to be
 22 held in the branch; is that right?

23 **A.** Yes.

24 **Q.** Where there was a difference between these two
 25 records, an apparent shortfall, did you consider

19

1 "After an audit shortage had been reported
 2 to the Security Casework Team it would be
 3 assessed as to whether a case should be raised.
 4 If a case was raised then it was allocated to
 5 the Team Leader for that area. The Team Leader
 6 would then assess what response was required and
 7 if necessary allocate it to an Investigator.
 8 An Investigator would attend the office and try
 9 to establish the facts and identify if
 10 a suspected criminal offence had or had not
 11 taken place. They would identify persons of
 12 interest to the investigation. If a suspect was
 13 identified they would be cautioned and depending
 14 on the circumstances request voluntary searches
 15 and attendance at interview."

16 You deal with the steps which would be taken
 17 once a case had been raised at paragraph 44 of
 18 the statement, which is on page 14. You say:

19 "Once a case had been raised and assigned to
 20 an Investigator the stakeholder (Contracts
 21 Manager) would be informed that the
 22 investigation had been assigned to them for
 23 further enquiries to be made. Contact made with
 24 the informant to establish the facts and
 25 consideration given to obtaining a witness

18

1 that this alone was sufficient evidence of
 2 a criminal offence to proceed to an interview
 3 under caution of a subpostmaster or branch staff
 4 member?

5 **A.** I think it would depend on the circumstances on
 6 what the subpostmaster has said to us. So each
 7 case was on its own merits, really. So it may
 8 be that there might be an explanation for it, in
 9 which case there wouldn't be an interview; or it
 10 may be that they've admitted to something, in
 11 which case there would be an interview under
 12 caution.

13 **Q.** What about where someone hadn't admitted
 14 something and had given an explanation that you
 15 didn't, on face value, accept? Would there
 16 still be an interview in those circumstances?

17 **A.** Possibly, taking into -- other factors that
 18 might have been evidence of false accounting or
 19 something along those lines.

20 **Q.** Could we have the next page on screen, please,
 21 paragraph 45. Here you say this:

22 "Case papers were submitted to Legal
 23 Services for advice as to whether a case was
 24 suitable for a prosecution. The Lawyer
 25 allocated the case would decide if there was

20

1 sufficient evidence for a realistic prospect of
 2 conviction. If Legal Services recommended
 3 a prosecution then the case papers were sent to
 4 the Designated Prosecution Authority to decide
 5 if a prosecution proceeded. On authority from
 6 the DPA the legal process would commence."
 7 Who acted as the Designated Prosecution
 8 Authority?
 9 **A.** It was a senior manager within the Investigation
 10 Team.
 11 **Q.** Did an Investigator conducting the relevant
 12 investigation have any input into the decision
 13 as to whether someone should be prosecuted?
 14 **A.** No.
 15 **Q.** Could we have on screen, please, paragraph 42 of
 16 Ms Allen's statement, that is page 13. Here you
 17 say this:
 18 "The contracts investigation would run
 19 independent of the investigation case. However,
 20 if the Contracts Manager decided that they would
 21 accept a repayment of a loss and not suspended
 22 the subpostmaster, then a criminal investigation
 23 would not ensue."
 24 Was a subpostmaster having made good
 25 an apparent shortfall therefore a material
 21

1 **Q.** Going over two pages, please, to paragraph 46.
 2 You say here:
 3 "I do not recall the Contracts Manager
 4 having any input into the decision."
 5 This is decision making about prosecution,
 6 in terms of the context of the question you're
 7 answering:
 8 "However, if the Contracts Manager decided
 9 to reinstate the subpostmaster then
 10 a prosecution would not be deemed appropriate
 11 and would not proceed."
 12 Why would a prosecution not be deemed
 13 appropriate and not proceed in these
 14 circumstances?
 15 **A.** Well, it's the same answer as before, really.
 16 If -- I don't think we could prosecute somebody
 17 who we was employing. If it was that serious,
 18 then I think the Contracts Manager would have at
 19 least suspended, if not dismissed, and then we
 20 would have proceeded with a prosecution.
 21 **Q.** Do you ever recall a Contract Manager
 22 reinstating a subpostmaster and a prosecution
 23 decision being changed as a result of that?
 24 **A.** I don't, no.
 25 **Q.** In principle, who would reassess the position in
 23

1 factor in decisions about whether that
 2 subpostmaster should be criminally investigated?
 3 **A.** No, I don't believe it was.
 4 **Q.** How does your answer fit with that paragraph in
 5 your statement, that if the Contracts Manager
 6 decided that they would accept a repayment of
 7 a loss and not suspend the subpostmaster, then
 8 a criminal investigation would not ensue?
 9 **A.** Well, I don't think it would be right to
 10 prosecute somebody who we was employing.
 11 **Q.** So is it the fact of not suspending them, rather
 12 than the repayment, that you're referring to
 13 there as to why a criminal investigation would
 14 not ensue?
 15 **A.** Yes, if the Contract Manager thought they were
 16 fit to still serve as a subpostmaster and be
 17 employed, then we would not obviously prosecute.
 18 It wouldn't be right to prosecute somebody who
 19 we was employing.
 20 **Q.** As far as you were aware, was repayment of
 21 an apparent shortfall a material factor in
 22 decisions about whether that subpostmaster or
 23 branch subpostmaster, should be prosecuted?
 24 **A.** I don't think so because people were still
 25 prosecuted who had made full repayment.
 22

1 relation to the prosecution in these
 2 circumstances?
 3 **A.** Well, I think if an investigation was raised and
 4 the Contract Manager reinstated the
 5 subpostmaster, then that -- the case wouldn't go
 6 no further. It would just be no further action.
 7 So I would imagine that possibly the Team
 8 Leader.
 9 **Q.** What about in circumstances where the Criminal
 10 Law Team had already provided advice, for
 11 example, to proceed with the prosecution?
 12 **A.** I don't ever recall a case getting that far.
 13 **Q.** To the extent that you can say, where no further
 14 action was taken on a criminal investigation,
 15 would a subpostmaster or branch staff member who
 16 had been suspended be reinstated in those
 17 circumstances?
 18 **A.** Yes.
 19 **Q.** Could we have on screen, please, paragraph 34 of
 20 Ms Allen's statement. It is page 11. In
 21 paragraph 34, you say:
 22 "We adhered to PACE 1984, Criminal Procedure
 23 and Investigations Act 1996, Human Rights Act
 24 2000, Proceeds of Crime Act 2002, Data
 25 Protection Act 1998."
 24

1 You go on at paragraph 35 to say:
 2 "There were also a number of RMG policies
 3 within our databases that we adhered to."
 4 The databases you refer to here, were they
 5 Royal Mail Group databases or a Post Office
 6 database or databases?
 7 **A.** They was all held by Royal Mail Group.
 8 **Q.** How would an Investigator access this database
 9 or databases?
 10 **A.** I believe we had a Corporate Security database
 11 on the intranet, so everything was listed on
 12 there: communications, the policies, et cetera.
 13 **Q.** The legislation you refer to at paragraph 34,
 14 where would an Investigator find copies of that
 15 legislation if they wished to refer to any of
 16 the legislation referred to?
 17 **A.** On the Corporate Security database. We were
 18 provided with PACE books and the CPIA books.
 19 But the majority of the stuff we could find, it
 20 was on the Royal Mail Group Corporate Security
 21 database.
 22 **Q.** Could we have on screen, please, paragraph 22 of
 23 Ms Allen's statement. That is page 5. Under
 24 the heading of "Disclosure in criminal or civil
 25 proceedings", you say:

25

1 what documentation would you provide to the
 2 Legal Team?
 3 **A.** Sorry, when I sent my report --
 4 **Q.** When you produced your legal report for the
 5 Criminal Law Team, having done your initial
 6 investigation -- and we'll come to an example of
 7 one of those reports later -- at that stage,
 8 what documentation would you provide to the
 9 Legal Team, apart from that report itself?
 10 **A.** Taped summary, any witness statements that had
 11 been taken, any evidence from those witness
 12 statements, the disclosure documents, NPA forms,
 13 antecedents, I believe.
 14 **Q.** When you say "disclosure documents", do you mean
 15 that disclosure schedules were provided --
 16 **A.** Yes, sorry.
 17 **Q.** -- at that stage?
 18 **A.** Yeah. Yes. I think -- yeah, they would have
 19 been put in the jacket at that time.
 20 **Q.** Was it at that stage, as opposed to at the point
 21 of doing the committal bundle?
 22 **A.** It may have been at the committal, actually.
 23 When we -- I think it was when I would have done
 24 the committal bundle, actually.
 25 **Q.** You refer at paragraph 22 of your statement to

27

1 "In all cases where I was Officer in the
 2 Case, I was also the Disclosure Officer. My
 3 role as the Disclosure Officer was to retain,
 4 record and reveal any material that may assist
 5 the defence or undermine the prosecution case.
 6 I was responsible for completing the disclosure
 7 schedules and for conducting all reasonable
 8 lines of inquiry."
 9 At the time you were an Investigator with
 10 the Post Office, did you understand that the
 11 Disclosure Officer role was a distinct role
 12 which you held over and above your role as
 13 an Investigator?
 14 **A.** I knew I was signing the documentation as the
 15 Disclosure Officer because that's what it says
 16 on the form. Whether or not I've properly
 17 understood, I'm not 100 per cent sure.
 18 **Q.** Did you understand that holding that role
 19 imposed upon you additional and distinct duties?
 20 **A.** I knew I had to obviously record, retain and
 21 reveal information, and I had a duty to do that,
 22 and it was an ongoing duty. That was my
 23 understanding, probably at that time.
 24 **Q.** At the point of submitting your report to Legal
 25 Services for advice on charge and prosecution,

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1 conducting all reasonable lines of inquiry. You
 2 also address lines of inquiry at paragraph 55 of
 3 your statement. Could we have that on screen,
 4 please. It's page 17. You say at 55:
 5 "An Investigator should take steps to make
 6 all reasonable lines of inquiry under CPIA that
 7 points to or away from the suspect."
 8 The question you were responding to here
 9 relates to instructions, guidance and/or
 10 training on the duty to investigate a case
 11 fully. You don't, in your answer there,
 12 identify any instructions, guidance or training.
 13 When you were a Post Office Investigator, were
 14 you ever given any instruction, guidance or
 15 training about what following a line of inquiry,
 16 pointing away from a suspect, might mean in
 17 practice?
 18 **A.** I don't recall any specific training given to
 19 it, but I can give an example of a case where
 20 I think the subpostmistress may have been
 21 arrested in relation to a big giro, a green giro
 22 fraud. Having interviewed her and her giving
 23 the explanation, I obviously went away and made
 24 some enquiries to from what she'd said interview
 25 and identified that she'd been actually targeted

28

1 by an organised crime group.
 2 She was subsequently reinstated but,
 3 obviously, given further training on how to
 4 identify manipulated green Giro cheques. So
 5 yes, I think we did -- or I did investigate to
 6 the best of my ability.
 7 **Q.** My question related to instructions, guidance
 8 and training. You've given an example of what
 9 you did in practice, but just going back to the
 10 question: you don't recall being given any
 11 instruction, guidance or training on that?
 12 **A.** I don't, no.
 13 **Q.** Would you accept that fully investigating
 14 a suspected theft required an Investigator to be
 15 satisfied that an apparent shortfall represented
 16 an actual financial loss to the Post Office?
 17 **A.** Yes.
 18 **Q.** When you were an Investigator, were you aware
 19 that the obligation to pursue lines of inquiry
 20 pointing away from a suspect extended to
 21 material in the hands of a third party, for
 22 example Fujitsu?
 23 **A.** Yes, I think so.
 24 **Q.** Could we have on screen, please, page 21 of
 25 Ms Allen's statement. In response to a question
 29

1 When you were asked whether ARQ data obtained
 2 from Fujitsu was provided to a subpostmaster as
 3 a matter of course, you say:
 4 "ARQ data obtained was not provided as
 5 a matter of course but was retained for
 6 providing to the defence upon request."
 7 Taking this in stages, would any ARQ data
 8 which had been obtained as part of the initial
 9 investigation be provided to the Criminal Law
 10 Team at the point that they were advising on
 11 charge and prosecution?
 12 **A.** I don't know. Sometimes maybe but not all the
 13 time, I wouldn't have thought.
 14 **Q.** Why not, in cases where it wasn't?
 15 **A.** Maybe it wasn't obtained at that time, it was --
 16 **Q.** But where it had been obtained by
 17 an Investigator, why would it not have been
 18 provided to the Criminal Law Team at the point
 19 they were advising on charging and prosecution?
 20 **A.** I don't know.
 21 **Q.** On the question of what was provided to the
 22 Criminal Law Team, we've touched on whether
 23 disclosure schedules themselves were provided at
 24 the point of charge and prosecution and I think
 25 you were saying it may well have been at the
 31

1 about whether ARQ data was requested from
 2 Fujitsu -- if we can scroll down a little
 3 further, please.
 4 So paragraph 74 is your response to
 5 a question about whether ARQ data was requested
 6 from Fujitsu, as a matter of course, in cases
 7 where subpostmasters were attributing
 8 a shortfall to problems with Horizon. You say
 9 in response:
 10 "I cannot recall if it was requested as
 11 a matter of course."
 12 Exploring that a bit further, please, do you
 13 accept, having seen the papers which have been
 14 provided to you by the Inquiry, that you were
 15 involved in a number of cases where
 16 subpostmasters were attributing shortfalls to
 17 problems with the Horizon system?
 18 **A.** Yes.
 19 **Q.** In such cases, would you accept that it was
 20 a reasonable line of inquiry to seek more
 21 detailed audit data from Fujitsu to explore
 22 whether further data might support what the
 23 subpostmaster was saying?
 24 **A.** Yes.
 25 **Q.** Going over the page, please, to paragraph 75.
 30

1 committal bundle stage. But in terms of
 2 material that you had collected in the course of
 3 your investigation, quite apart from the any ARQ
 4 data, how much of the material were you
 5 providing to the Criminal Law Team? Was it
 6 everything? Was it select documents?
 7 **A.** It was probably documents that had been
 8 potentially exhibited within the statements, or
 9 documents that were going to be relied upon if
 10 a prosecution was authorised.
 11 **Q.** Could we have on screen, please, document
 12 reference POL00141170. Starting about halfway
 13 down the page, please, there is an email from
 14 Juliet McFarlane -- apologies, from you to
 15 Juliet McFarlane, and it relates to the Jerry
 16 Hosi case. It is dated 21 January 2010 and it
 17 appears, on the face of this, that you are
 18 providing comment on a number of disclosure
 19 requests made by the defence in this case.
 20 I know this is one of a number of documents
 21 provided to you quite recently. Have you had
 22 a chance to have a look thorough this document?
 23 **A.** Briefly.
 24 **Q.** Focusing, please, just on point 4, to start
 25 with, you say:
 32

1 "The full Fujitsu Data can be provided but
2 who would pick up the cost? I am not sure what
3 the benefit would be for obtaining the full
4 data. We could provide a sample of a time
5 specified by the defence to allow the Accountant
6 to gain understanding of the system etc."

7 Picking up, first of all, on the second and
8 third sentences here, you seem to be expressing
9 some doubt about the utility of obtaining the
10 full Fujitsu data, as you describe it. Was your
11 understanding at the time that the sole purpose
12 further Fujitsu data might serve was that it
13 could help an accountant to gain
14 an understanding of the system?

15 **A.** I mean, obviously they wanted to do their own
16 analysis on the documents -- on the data, but
17 yes, it looks like that. It is for the
18 accountant to gain understanding of the system.
19 That's how that reads.

20 **Q.** Were you ever given any training or instruction
21 on the differences between Horizon data
22 available from the counter in a branch, and
23 later, Credence data, on the one hand, and the
24 data held by Fujitsu as part of the audit trail,
25 on the other?

33

1 to what extent.

2 **Q.** Did you know that more information could be
3 gleaned from the data held by Fujitsu than could
4 be from the counter printouts or the Credence
5 data?

6 **A.** No.

7 **Q.** Did you know that there was more information in
8 an enhanced request than the standard ARQ
9 request I've just referred to?

10 **A.** I didn't know there was an enhanced data
11 request.

12 **Q.** Does it follow that you didn't know that
13 an enhanced interrogation of the audit trail
14 could show when a transaction or event had been
15 performed by the system, when Credence could
16 show it had been performed by a subpostmaster or
17 branch staff member?

18 **A.** No.

19 **Q.** Do you think you would have benefited from being
20 trained in the types of Fujitsu data which were
21 available and what they could show?

22 **A.** I do, yes.

23 **Q.** Could we have back on screen, please,
24 POL00141170 -- ah, it's still there.

25 Picking up the first sentence in point 4:

35

1 **A.** I was aware of both Credence and data from
2 Fujitsu. It varied. It was slightly different.

3 **Q.** How did you understand it to be different?

4 **A.** The layout of how it was laid out was different.

5 I think on the Credence data it gave you the
6 explanation or the -- instead of the product

7 look-up number, PLU number of an item, it gave
8 you a description, where number 1 would be cash
9 it would say, "Cash", so it's easier to
10 understand.

11 I think it only went back 90 days. I think
12 it was just the same data presented in
13 a different way.

14 **Q.** Were you aware that there was a difference
15 between the standard ARQ request and the full
16 data held by Fujitsu?

17 **A.** I wasn't aware there was a difference but I was
18 aware that you could -- I requested some data
19 for an office, and I needed the Special Delivery
20 numbers, and the address that was entered into
21 the system at the time of posting. The data
22 came back, and it came back without that
23 information. So I had to resubmit it to get
24 this data. So I did know that there was extra
25 data you could get but I didn't know, obviously,

34

1 "The full Fujitsu data can be provided but
2 who would pick up the cost?"

3 Did you consider at the time that the cost
4 of obtaining data from Fujitsu was a relevant
5 factor when deciding whether it should be
6 obtained and disclosed?

7 **A.** The problem with Fujitsu data was that we was
8 limited to a number of requests, so if I had put
9 in a request for the full data, it would have
10 been refused. So I was limited to picking
11 a particular period to be able to provide that
12 data.

13 **Q.** You refer in your witness statement at
14 paragraph 78 to a quota of requests for ARQ
15 data; is that what you're referring to?

16 **A.** It is, yeah.

17 **Q.** That was a quota placed on ARQ data requests
18 made of Fujitsu which would be met without
19 additional cost; is that right?

20 **A.** That's right, yes.

21 **Q.** Was this something you were conscious of when
22 deciding whether to seek ARQ data from Fujitsu
23 as part of an investigation you were conducting?

24 **A.** Yes, probably, because if I'd have submitted the
25 request for the full lot, I know it would have

36

1 been refused because every 30 days would have
 2 taken up one request. So even if you wanted
 3 a full month, 31 days, that would have been two
 4 requests. So, yes, I suppose we was conscious
 5 of the requests we were putting in.

6 **Q.** Was the quota widely known about within the
 7 Investigation Team?

8 **A.** I believe it was, yes.

9 **Q.** Who was responsible for deciding whether to
 10 retrieve Horizon data from Fujitsu and does the
 11 answer to that depend on the stage that the case
 12 had reached?

13 **A.** Quite possibly, yes.

14 **Q.** So at the initial investigation stage, was it
 15 the Investigator conducting the investigation
 16 who decided?

17 **A.** It was, yes.

18 **Q.** Once the decision had been made to prosecute,
 19 whose decision was it then?

20 **A.** If a direction had been given from counsel
 21 maybe, or the solicitor, or from the defence, if
 22 they'd requested some particular period, then,
 23 obviously, that would have been applied for.

24 **Q.** In general terms, is it right that ARQ data was
 25 only obtained as a last resort?

37

1 precise words but you know what I mean -- it
 2 would have been refused. Who would have refused
 3 you? Do you mean by that, Fujitsu wouldn't have
 4 supplied it or do you mean by that that the
 5 person responsible in the Post Office for asking
 6 for the data, would have refused to ask for it?

7 **A.** The person who I would have submitted the
 8 request to, who was dealing with that -- the
 9 Fujitsu contract at the time, they would have
 10 refused it and sent it back and said, "Can you
 11 ask for -- we've only got so many quotas left
 12 this month, can you either hold on until next
 13 month or can a just submit less requests?"

14 **SIR WYN WILLIAMS:** Remind me again, what was the job
 15 title of that person who'd be making that
 16 decision?

17 **A.** That would have been the Casework Manager,
 18 I believe.

19 **SIR WYN WILLIAMS:** Yes, that's it. Thank you.
 20 Yes, thank you very much.

21 **MS PRICE:** Thank you, sir.

22 Where someone was attributing shortfalls to
 23 a problem with the Horizon system, did you, as
 24 a matter of course, check if there was any
 25 history of problems with the Horizon system

39

1 **A.** I wouldn't say as a last resort. I think it was
 2 in most cases some form of data was requested,
 3 but obviously due to the amount of requests we
 4 had, we were limited to what we could ask for.

5 **Q.** Before we move on from this document, looking at
 6 point 7 at the bottom, please, you say this:

7 "We do not have the facility to make any
 8 adjustment to the cash balance. We can only
 9 send a TC ..."

10 Transaction correction; is that right?

11 **A.** Yes.

12 **Q.** "... which when accepted will affect the cash
 13 figure."

14 **A.** Yeah.

15 **Q.** Were you aware at the time, or any other time
 16 when you were an Investigator for the Post
 17 Office, that there was facility for Fujitsu to
 18 alter a branch value at the counter of the
 19 branch without the branch knowing?

20 **A.** Absolutely not.

21 **Q.** Thank you. That document can come down.

22 **SIR WYN WILLIAMS:** Can I just ask you, Ms Allen,
 23 I think on two occasions in answer to Ms Price's
 24 questions, you said that, if you had asked for
 25 a full set of ARQ data -- they may not be the

38

1 being reported by the relevant branch?

2 **A.** We would have obtained the call logs from the
 3 National Business -- NBSC and from the Horizon
 4 Service Helpdesk.

5 **Q.** Would you have done that as a matter of course
 6 in every case?

7 **A.** I believe so.

8 **Q.** Even at the stage of an initial investigation?

9 **A.** Possibly not at the initial investigation,
 10 obviously depending on the circumstances.

11 **Q.** Was there any one team within the Post Office of
 12 which an enquiry could be made about whether
 13 there was a history of reporting of problems
 14 with the Horizon system, bearing in mind that
 15 there were different relevant helplines?

16 **A.** The subpostmaster should always have reported
 17 any issues into the NBSC. So any issues they'd
 18 identified should have been recorded at that
 19 point.

20 **Q.** I'd like to turn, please, to your involvement in
 21 the criminal investigation and prosecution of
 22 Suzanne Palmer. You deal with your involvement
 23 in the case from paragraph 84 of your statement.

24 Is it right that you first became involved
 25 following an audit of Mrs Palmer's branch on

40

1 3 February 2006, which recorded an apparent
 2 shortage in the branch of £14,700?
 3 **A.** Yes.
 4 **Q.** You say you would have attended the branch that
 5 day and spoken to Mrs Palmer --
 6 **A.** I believe so, yes.
 7 **Q.** -- and made arrangements for an interview under
 8 caution to take place on 6 February 2006?
 9 **A.** Yes.
 10 **Q.** Is it right that Lester Chine acted as Second
 11 Officer in the case for the purposes of that
 12 interview?
 13 **A.** He did.
 14 **Q.** Could we have on screen, please, paragraph 90 of
 15 Ms Allen's statement. That is page 26. You say
 16 here:
 17 "I do not recall specifically any issues
 18 relating to the reliability of the Horizon
 19 system. I have considered doc (POL00053009)
 20 [which is the record of tape recorded interview]
 21 and Mrs Palmer does comment within the interview
 22 (tape 1) on the system going down and causing
 23 a loss in which she repaid and some other issues
 24 where the system is offline. I do not recall
 25 whether this issue was recorded on any Helpdesk
 41

1 Moderator 1, is that you, where we see
 2 "Moderator 1" in the transcript? We have
 3 Moderator 1 and Moderator 2?
 4 **A.** Yes, I think that's me, yes.
 5 **Q.** You refer to some sheets which Mrs Palmer had
 6 given you on Friday --
 7 **A.** Yes.
 8 **Q.** -- that was the day of the audit, was it?
 9 **A.** I believe so.
 10 **Q.** Mrs Palmer says:
 11 "Okay, so, the cash is this."
 12 You say:
 13 "Right, if I could just, for the purpose of
 14 the tape, explain, these are A4 sheets of paper,
 15 they're listed from Thursday to Wednesday and
 16 then we've got a breakdown of all the notes and
 17 coin. It's written in pencil and there are -- "
 18 Suzanne Palmer says:
 19 "They're just, as we do them every evening.
 20 The top here is scratchcards."
 21 You say:
 22 "You're putting 'S' and 'M'. Scratchcards?
 23 Mrs Palmer says:
 24 "Because that was, they sent me bundles of
 25 error notices that they asked me to go through
 43

1 logs and I am unable to recall if further
 2 enquiries were made."
 3 So, although you do not now recall Horizon
 4 issues being raised by Mrs Palmer, you accept,
 5 do you, that, looking at the record of taped
 6 interview, she did raise Horizon issues
 7 interview with you?
 8 **A.** I think she raised one issue in relation to the
 9 system going down in August 2005, and she
 10 referred in another part of the interview to the
 11 losses being £100 up or £100 down, which I took
 12 to mean that one week she was £100 over and the
 13 next week she was £100 short, which could have
 14 been the result maybe as not counting the cash
 15 properly. As an ex-counter clerk, it happened
 16 to me, so that was my understanding of it.
 17 **Q.** If we could look, please, at the transcript of
 18 that first tape from the interview, which took
 19 place on 6 February 2006. The document
 20 reference is POL00069058.
 21 Mrs Palmer declined to have a solicitor or
 22 a friend present; is that right?
 23 **A.** That's correct.
 24 **Q.** Could we go, please, to page 7 of this document.
 25 About two-thirds of the way down the page,
 42

1 and they said they needed them put -- and
 2 I never agreed with them. I phoned several
 3 hundred, million times. Well, no ... eight.
 4 You say:
 5 "So, on this particular sheet which, it's
 6 not data or anything, you're pointing to --
 7 "That is scratchcards", Mrs Palmer says.
 8 You say:
 9 "Scratchcards and it says £2,500?
 10 "Yes, and that was an error note and they
 11 told me I had to put them through. I didn't
 12 agree with them but she said they had to go
 13 through the system. So, I just wrote them as
 14 'odds' because I wanted somebody to come and
 15 sort it out with me, but that's been going on
 16 a little while."
 17 Just pausing there, Mrs Palmer was telling
 18 you that she had noted at the time on the
 19 records that she disagreed with the error
 20 notices she was receiving and she wanted someone
 21 to come and sort it out for her, wasn't she?
 22 **A.** Yes.
 23 **Q.** Then you ask:
 24 "How long has that been going on?"
 25 She says:
 44

1 "I can't think. Because I haven't been in
2 the post office, I can't think how far long it
3 went back.
4 "Has it gone months or weeks?
5 "Yes, months.
6 "Months?"
7 Mrs Palmer says:
8 "What they were, they were error notices.
9 They said they had been activated. Then they
10 sent me reams of paper and I tried add to sort
11 it at. I tried to I think them several times
12 but, obviously, they're only there 9.00 until
13 5.00 and I'm in the post office. I mean, I've
14 got all ... Sorry."
15 She says:
16 "I just can't believe this. Sorry. So,
17 I just wrote it like "Oh, well, it's written
18 every time. It's all" --
19 "So, have you brought the error notices to
20 account, is that what you've done?", is your
21 question.
22 The reply:
23 "I've brought them to account because
24 they've told me to. There's no question. So,
25 I just put them through but there is nobody to
45

1 you're basically carrying that as a cash figure
2 because you've not put the £2,500 cash in to
3 account for the error notice?"
4 Suzanne Palmer says, "No".
5 So Mrs Palmer was reporting to you, wasn't
6 she, that she was experiencing unexplained
7 losses and that she had sought help from the
8 helpline at the time.
9 **A.** She'd been sent transaction corrections for
10 scratchcards that she couldn't understand and
11 didn't accept.
12 **Q.** Could we go, please, to page 34 of this
13 document. About halfway down, Mr Chine asks
14 this:
15 "In terms of the £2,500 which, you've
16 explained, relates to error notices that you
17 brought to account, how long have you been
18 holding -- "
19 The response is: "A few months".
20 Mr Chine:
21 "A few months. What, we're talking about,
22 sort of, November? October, November time,
23 maybe?"
24 The response is:
25 "It might've been before that. What
47

1 contact now. When Nick Kerr came, he's the guy.
2 I used to speak to Deirdre South, she was there,
3 but then they said that she doesn't deal with
4 that any more. There is actually nobody. You
5 have to dial through to the -- "
6 Moderator 2, is that Mr Chine?
7 **A.** Yeah.
8 **Q.** "Helpline?"
9 You said:
10 "Helpline at the FBC?"
11 What does "FBC" stand for?
12 **A.** I think that should be NBSC.
13 **Q.** The response:
14 "Yes, then they couldn't help me. Then when
15 the office was closed for a week, we had no
16 online, no anything and I kept saying to them,
17 you know, 'I need some help here'. Nobody did
18 anything. I couldn't get anybody down to come
19 and see me. I mean, there is a loss that week
20 which, obviously, I put in, but they've never
21 explained to me what happened there. You know,
22 I feel a bit -- that's why it's there. The
23 £2,500 is cash that I put in.
24 "Right, so this is £2,500. This is
25 scratchcards that, you've talked to account and
46

1 happened was, they sent me loads of error
2 notices over scratchcards and I've got reels of
3 paper that they just sent me things through and
4 the lady, I tried to ring her and I said to her,
5 'I don't agree. I can't make out what is here.
6 I can't understand it'. I tried to sort it out
7 and I rang her, like, several times trying to
8 sort it out and she said, 'You know, you have to
9 bring them to account'. But I've never been
10 able to -- so, yes, I just put them through.
11 Then I thought I'd be able to sort it out at
12 some point. Not quite in this way."
13 Your question:
14 "So, you were holding them in the hope
15 something would come back?"
16 The response is:
17 "Yes, I mean, I know it's a larger amount
18 but it's like the £253. Like, they said to me
19 I could take that out because it's -- "
20 You say:
21 "It was a surplus for the week?"
22 She says:
23 "Yes, I mean, I just never touched it.
24 I know it isn't mine. I know that something is
25 going to come back somewhere. It's like, that's
48

1 what I said, when we had the week where the
2 whole system went down, it took them a week to
3 fix it. I had no online, but they still said
4 that I had to keep the post office open. I was
5 still taking in giros, couldn't put them through
6 the system, couldn't do anything. I was holding
7 a whole week and I kept ringing up and saying,
8 'I've got over £100,000-odd here'. You know,
9 when it noted that this is what -- that's what
10 I said, I've never had any back-up here."

11 You say:

12 "When was it this happened then? Do you
13 remember?"

14 Mrs Palmer says, "That was August.

15 "... and is it Mick Clerk?"

16 "Mick Clerk, yes."

17 **A.** I think that should be maybe Nick Kerr.

18 **Q.** Nick Kerr, the name we saw earlier.

19 **A.** Yeah.

20 **Q.** Suzanne Palmer says at the bottom:

21 "He even sent emails to them but, you know,
22 lots of them because there was a shortage that
23 week and they just said 'Oh, you know, you've
24 got to put that in'. Which obviously I just
25 did. I mean, I just said, 'Surely these errors

49

1 there, badgering on, but that's what I'm saying.
2 Here, that's what I said, when, I'm not sure if
3 it's £500 or £600 that was in error that week.
4 I kept thinking, 'Well, the errors are going to
5 come back'. You know, like, they send you
6 an error notice? Like with these, I thought,
7 'They've sent me an error but it will come
8 [back]."

9 You say:

10 "You think you'd get a compensating one?"

11 Suzanne Palmer says, "Yes".

12 Moderator 2 goes on to ask about error
13 notices and whether they're sent usually because
14 you've made mistakes in previous weeks, and
15 there's discussion down that page about the time
16 frame for error notices, about eight weeks being
17 suggested by Mrs Palmer.

18 At the bottom of the page, Suzanne Palmer
19 says:

20 "So, when I'm thinking, that's what I said,
21 like, with the surplus. They said to me, 'Well,
22 you've taken it out'. I said 'Well, I know it's
23 not mine. It's not my money. I know that'."

24 So she's saying here that there's been
25 a surplus, she's been told she can take it out

51

1 will come back?' I mean, the system went wrong
2 on the Saturday, I rang the helpline straight
3 away. They said they'd get somebody out on
4 Monday. They sent somebody Monday who didn't
5 have the right box part. He went away and came
6 back with the wrong part. Then I rang and said,
7 'What do we do?' They said, "Well, just carry
8 on taking'. I said, 'But Swallow Aquatics and
9 all the businessmen', I've got no online
10 banking. I can't do any off-reports, I can't do
11 anything'. I had to carry on for a week and
12 then on Wednesday, they finally brought the
13 right box for the computer but didn't bring
14 a printer that was compatible with it. So,
15 I couldn't even do the office balance. So, they
16 made me shut on the Thursday. Then he came with
17 the printer on the Thursday they said, they're
18 not allowed to carry ink ..."

19 She goes on:

20 "... I kept ringing people to say to them,
21 you know, 'I need help here. Somebody's got
22 to -- I've got all this money, I've got all of
23 these giros not going through the accounts.
24 Everything is a mess' ... it might have been
25 after -- hang on, forgotten where I was going

50

1 of the till but she doesn't want to because she
2 thinks it's not right and it's an error; is that
3 right?

4 **A.** Yes.

5 **Q.** Then Moderator 2, so Mr Chine:

6 "For that £2,500, had you had £2,500 worth
7 of surpluses in the, sort of, months prior to
8 receiving those error notices?"

9 She says: "No.

10 "You haven't?"

11 "That's what I said to you. I mean, I still
12 have, you've seen, I've got it all in the post
13 office, I've still got everything that relates
14 to that period. I've just got pages and pages
15 of why."

16 Then you ask:

17 "What are the losses like at the office,
18 generally?"

19 She says.

20 "Well, it goes from £100 over to £100
21 under."

22 I think this is what you were referring to
23 earlier when you were recalling --

24 **A.** Yes.

25 **Q.** -- what you were being told about. You say:

52

1 "A bit up and down, are they?"
 2 At the bottom, Mrs Palmer says:
 3 "Yes, they're a bit erratic, but it seems
 4 to -- like three weeks ago we balanced and all
 5 week, I haven't got the figures here, but we
 6 were, like, running £100 wrong and I said to Mo,
 7 'Look, we'll count all of the money again, we'll
 8 unbag all of the money that we've done up to run
 9 out, we'll count it all again'. Then, just on
 10 the Wednesday, I suppose it could could've been
 11 in the stamps, couldn't it? But it then comes
 12 back, are you with me? It's, sort of, like, one
 13 overtakes the other. So, like, where I was £250
 14 over and they said to me, I should've taken that
 15 out to make my balance correct -- "
 16 Moderator 1: "Yes".
 17 Moderator 2:
 18 "Yes, that's what you should do."
 19 So Mrs Palmer was giving a detailed account
 20 here, wasn't she, of the technical problems she
 21 was experiencing with the Horizon system, and
 22 the difficulty she was having balancing over
 23 a period of months?
 24 **A.** She had indicated she had had issues, yes.
 25 **Q.** She gave you a particular month when she kept
 53

1 I think I understood her balancing £100 up, £100
 2 down would have come into it.
 3 **Q.** Could we have on screen, please, document
 4 reference POL00053007. This is the report that
 5 you completed for Legal Services in Mrs Palmer's
 6 case. Going, please, to page 6 of this
 7 document, towards the bottom we see your name
 8 and the date of the report, 20 February 2006.
 9 **A.** Yeah.
 10 **Q.** Going back, please, to the first page and
 11 scrolling down a little, please, you set out,
 12 first of all, some of the background to the
 13 interview conducted. Going over of the page,
 14 please, and about halfway down you start to
 15 address the interview of 6 February 2006.
 16 You say in that paragraph that you are
 17 enclosing a transcript of the interview. So is
 18 it right that you provided the Criminal Law Team
 19 with a transcript of the interview that we've
 20 just looked at?
 21 **A.** I did, yes.
 22 **Q.** Going over the page, please, the last paragraph:
 23 "Mrs Palmer was asked to explain the entries
 24 made on the daily record sheets. She claimed
 25 that the £2,500 entry that there is each day is
 55

1 ringing up the helpline and that was August of
 2 the previous year, wasn't it?
 3 **A.** Yes.
 4 **Q.** Did you think at the time that the technical
 5 difficulties and balancing problems Mrs Palmer
 6 was experiencing with the Horizon system were
 7 relevant to your investigation?
 8 **A.** I was not aware of any issues with the Horizon
 9 system.
 10 **Q.** But you were being told, weren't you, that she
 11 was having issues with the Horizon system, and
 12 particularly that she'd been having balancing
 13 issues?
 14 **A.** At one point in August she had an issue, yes.
 15 **Q.** Well, there are a number of references in the
 16 transcript we've just looked at to things being
 17 out, being up or down.
 18 **A.** Yes, there were but, as I explained, that, quite
 19 often, when you're balancing yourself, as I've
 20 experienced myself as a counter clerk, when
 21 you're counting your cash and you're entering it
 22 into the system, you can't see your own
 23 mistakes. So I could keep entering the same
 24 mistake every time, the following week,
 25 obviously, it will get rectified, which is where
 54

1 related to scratchcard error notices. Some
 2 months ago now she received a number of error
 3 notices related to scratchcards. She was unsure
 4 of why she had received them and requested
 5 assistance from the Post Office for dealing with
 6 this problem. Nobody visited the office and she
 7 was informed that they had to be brought to
 8 account immediately. As instructed Mrs Palmer
 9 processed the error notices. In order to do so
 10 as she did not have sufficient funds to pay for
 11 the error notices, she was carrying the amount
 12 of £2,500 in her daily cash on hand. She
 13 claimed that she believed a further error notice
 14 would be received and that it would compensate
 15 for the loss. To date this has not been the
 16 case."
 17 Then going over the page, please, to the
 18 last paragraph. Scrolling down, please:
 19 "At the present time it is not known when
 20 the error notices were processed so I am unable
 21 to identify the date at which Mrs Palmer
 22 inflated her cash-on-hand figure by £2,500.
 23 Again she did not have the funds to cover this
 24 and continually accounted for this in the cash
 25 hoping for a compensating error notice.
 56

1 However, she admitted that error notices were
2 usually received within 8 weeks and she has been
3 holding this amount for many months."

4 You have had a chance to read this report
5 for the purposes of preparing your statement.
6 Would you agree that there is no reference in
7 this report to the wider technical problems and
8 balancing issues which Mrs Palmer raised in her
9 interview with you?

10 **A.** Not within the report there aren't but there
11 are -- obviously, the taped transcript was
12 provided for the Legal Team and the Designated
13 Prosecution Authority to consider when making
14 the decision.

15 **Q.** Why didn't you include them in the report,
16 knowing that this would be the key document
17 considered by the Criminal Law Team when they
18 advised on charge and prosecution?

19 **A.** Because, at the time, I didn't believe there was
20 an issue with the Horizon system. I believed
21 that the one-off incident in August -- the
22 incident in August was a one-off and the issues,
23 as explained with the balancing up and down,
24 were compensating errors, mistakes with counting
25 cash or stock.

57

1 **A.** I don't think I obtained the logs before but
2 I do think I've obtained them after.

3 **Q.** We'll come on to what was obtained for the trial
4 in due course but, just in terms of this stage,
5 before submitting your report to the Criminal
6 Law Team, did it occur to you or did you
7 consider whether you should be asking Fujitsu
8 for ARQ data?

9 **A.** I don't recall what I was thinking at that time.

10 **Q.** Given what Mrs Palmer was telling you about the
11 technical difficulties she was experiencing and
12 the balancing problems she was having, did you
13 consider raising with anyone the question of
14 whether there should be any investigation into
15 the operation of the Horizon system in
16 Mrs Palmer's branch?

17 **A.** No.

18 **MS PRICE:** Sir, I wonder if that's a convenient
19 moment for the morning break?

20 **SIR WYN WILLIAMS:** Yes. Are we on a reasonable time
21 schedule?

22 **MS PRICE:** Yes, sir, we are.

23 **SIR WYN WILLIAMS:** Very good. Do you want
24 15 minutes?

25 **MS PRICE:** Just 15 minutes, please, sir.

59

1 **Q.** You say in your statement at paragraph 90 that
2 you do not recall whether system issues reported
3 by Mrs Palmer were recorded on any Helpdesk
4 logs. There is no reference in this report to
5 you having made any enquiries of any helplines
6 by this stage?

7 **A.** Yes.

8 **Q.** We'll come on to what happened later. Why
9 didn't you contact the helplines, specifically
10 the NBSC and Horizon Helpdesk, following your
11 interview with Mrs Palmer and before submitting
12 your report to the Criminal Law Team?

13 **A.** Obviously, this was almost 18 years ago now, so
14 it's quite hard to recall back then. But
15 I believe the audit shortage itself was
16 explained, as in the £9,000-odd of
17 non-accounting for sales of scratchcards, money
18 used to put into the personal ATM machine and,
19 obviously, the transaction correction notices.
20 So, as far as the way I viewed it, the loss was
21 accounted for, if that makes sense.

22 **Q.** Did you consider seeking ARQ data from Fujitsu
23 following your interview with Mrs Palmer and
24 before submitting your report to the Criminal
25 Law Team?

58

1 **SIR WYN WILLIAMS:** So what time will that be please?

2 **MS PRICE:** I think that takes us to 11.35.

3 **SIR WYN WILLIAMS:** Yes, fine. 11.35 then please.

4 (11.22 am)

(A short break)

6 (11.35 am)

7 **MS PRICE:** Hello, sir, can you see and hear us?

8 **SIR WYN WILLIAMS:** Yes, thank you very much.

9 **MS PRICE:** Could we have on screen, please, document

10 reference POL00052990. Going to the second
11 page, please, we can see this is from Jarnail
12 Singh, senior lawyer with the Criminal Law Team.

13 Going back to page 1, please. We can see it
14 is dated 10 March 2006. It is sent to the
15 Investigation Team and copied to you. Mr Singh
16 says this:

17 "Noted thank you.

18 "I am of the opinion that there is
19 sufficient evidence to afford a realistic
20 prospect of conviction of Miss Palmer for the
21 offences of false accounting.

22 "This case is in my opinion more suitable
23 for trial in the Crown Court in view of the
24 deficiency in the account of £14,712.11. Once
25 the decision has been made please proceed to

60

1 obtain summonses.

2 "No further statements need to be obtained

3 at this stage."

4 Mr Singh then goes on to deal with evidence

5 which would be needed in the event that the

6 matter were to proceed to trial. He lists:

7 "1. Statement from the Auditors.

8 "2. Statement dealing with Mrs Palmer's

9 appointment at the office as the subpostmistress

10 producing a copy of the relevant extract of

11 Mrs Palmer's contract showing it is not

12 permitted to use Post Office Limited funds.

13 "3. Statement from Lisa Allen and Chester

14 [*sic*] Chine outlining their total involvement in

15 the matter and producing the relevant exhibits

16 for the weeks charged.

17 "4. Any other statements the Officers

18 consider relevant."

19 So Mr Singh did not ask you to make any

20 enquiries of the helplines or to obtain any

21 audit data from Fujitsu at this stage, did he?

22 **A.** Not at that stage, no.

23 **Q.** Could we have on screen, please, POL00053003.

24 This is a memo dated 26 July 2006. Scrolling

25 down, please, it is from Ms Andrews, from the

61

1 defendant refers in interview processed? The IM

2 could not supply this answer when her report was

3 submitted.

4 "c) Is there any record of the Defendant's

5 training? Experience has shown that statement

6 to the effect that 'training would have been

7 given' are of no value ..."

8 Then "Further Evidence" at 4:

9 "The following matters of evidence should,

10 please, be attended to:

11 "a) Does the Counter Operations Manual

12 contain a section which deals with specifically

13 how scratchcard sales should be dealt with (on

14 Horizon)? If so, the relevant portion needs to

15 be copied and served with a supporting

16 statement.

17 "b) The SPM contract signed by the Defendant

18 should be obtained, copied and served as above.

19 "c) A statement should be obtained from Nick

20 Kerr to deal with the matters raised in

21 interview at [the relevant page references]."

22 At this stage, counsel advises that further

23 evidence needs to be obtained. Would it have

24 been you who actioned his requests?

25 **A.** Yes, it would.

63

1 Criminal Law Team. It is again sent to the

2 Investigation Team, scrolling up please

3 a little, and copied to you. It reads, as

4 follows:

5 "The Brief for the Prosecution has been sent

6 to Mr Stephen John of Counsel. A copy of the

7 Indictment is enclosed herewith the for your

8 information.

9 "A copy of Counsel's Advice on Evidence is

10 also attached. I would be grateful if you could

11 deal with the matters raised at paragraphs 3 and

12 4."

13 Could we have on screen, please, counsel's

14 advice referred into this memo. The reference

15 is POL00053008. Going, please, down to

16 paragraph 3, "Further Inquiries":

17 "There are a few issues arising from the

18 papers which I would be grateful to have

19 answering by the Investigation Manager, and

20 appropriate statements made and served to

21 confirm:

22 "a) To whom would the Defendant report

23 scratchcard errors? Are any records kept? If

24 so, they should be made available.

25 "b) When were the error notices to which the

62

1 **Q.** Mrs Palmer's case proceeded to trial. You don't

2 mention in your statement having any involvement

3 in the trial but further material relating to

4 Mrs Palmer's case has been made available to you

5 since completing your statement.

6 **A.** Yes.

7 **Q.** Do you now recall that you made two statements

8 for the purposes of the trial and attended court

9 to give evidence?

10 **A.** I do.

11 **Q.** Is it right that you were present for the whole

12 of Mrs Palmer's trial?

13 **A.** I would imagine I would be but I don't recall

14 that, but I should have been there, yes,

15 throughout the whole trial.

16 **Q.** Do you recall the trial at all?

17 **A.** Not specifically, no.

18 **Q.** Could we have on screen, please, the second of

19 the statements you made for the trial. The

20 reference is RMG00000254. This statement is

21 an unsigned draft, dated 11 September 2006. We

22 have been unable to locate the final signed

23 version. Have you had a chance to read this

24 statement recently?

25 **A.** Can I have a look at it?

64

1 Q. Of course. If we can just scroll down. I'll
2 take you through what it covers.
3 A. Okay.
4 Q. Just to refresh your memory as to which one it
5 is, there was an earlier statement from June
6 2006, which was in the papers you've now been
7 provided with --

8 A. Okay.
9 Q. -- and this was a further statement from
10 September 2006.

11 (Pause)

12 If I take you through the relevant sections
13 and you just say if you need more time to look
14 at it.

15 A. Okay, yeah.

16 Q. You deal, first of all, in this statement with
17 the procedure applying to Camelot Scratchcards.
18 You set out there that you produce as an item
19 LJA/10, which is the Counter Operations Manual
20 relating to Camelot Scratchcards, and then you
21 explain which sections there are in that
22 extract.

23 A. Yes.

24 Q. Going over the page, please. You say:

25 "I have now obtained a Fujitsu log for The
65

1 shows:

2 "Therefore it was the responsibility of
3 Mrs Palmer to pay this amount to Post Office
4 Limited at the time of entering the error
5 notices on 20 September 2005. It would appear
6 that Mrs Palmer has taken cash out of the Post
7 Office relating to the claim error notice but
8 has not paid the £2,520 that she owed to Post
9 Office Limited for the charge error notice."

10 A. Yes.

11 Q. Is it right that you only ever requested from
12 Fujitsu a log covering the period of the entry
13 of the error notices covered in this statement
14 and not for any wider period?

15 A. I don't recall what logs were requested at the
16 time but that log was obviously only for one
17 week, so that was one request, but I don't
18 recall if there was any other requests made.

19 Q. Given the wider issues being raised by
20 Mrs Palmer about the Horizon system and being
21 mindful that August 2005, for example, was
22 a month that was raised as a point when she was
23 calling for help, why was ARQ data not requested
24 for a longer period?

25 A. Given the time, I don't recall why.

67

1 Grange SPSO from 15 to 21 September 2005 that
2 I produce as item LJA/11."

3 It says:

4 "This log shows all the transactions entered
5 into the Horizon computer system during these
6 dates."

7 You produce a further extract from the log.

8 So the log you obtained covers the period of
9 one week, is that right, from 15 to 21 September
10 2005?

11 A. Yes.

12 Q. It appears from what follows, and please do take
13 the time to -- we can go through this, but do
14 cast an eye down, and going over the page,
15 please. It appears from what follows that the
16 purpose of obtaining the log for this week was
17 to show the entry of six error notices on to the
18 system; is that right?

19 A. Yes.

20 Q. "From item LJA/12, it can be seen that there are
21 six charge error notices entered by user SPA004
22 on 20 September ... These six charge error
23 notices amount to £2,520 and are the liability
24 of the subpostmistress to pay."

25 You say, having described what the log
66

1 Q. In the final paragraph of the statement, you say
2 this:

3 "I have contacted Security at Camelot and
4 there are no records of Mrs Palmer contacting
5 them querying any error notices. Likewise
6 I have contacted both Chesterfield who raise the
7 error notices and the Post Office National
8 Business Service Centre (NBSC), and there are no
9 records of any calls made relating to Camelot
10 Scratchcard or error notices relating to
11 scratchcards."

12 A. Yes.

13 Q. Did you read through the NBSC logs which were
14 obtained for the purposes of the trial by Julie
15 Edgely who exhibited them?

16 A. Sorry, did I read thorough?

17 Q. Did you read through the NBSC logs, which were
18 obtained for the trial and exhibited by Julie
19 Edgely?

20 A. I would have thought so, yes.

21 Q. Have you had a chance to read through the log of
22 NBSC calls which has been disclosed since you
23 made your statement, as part of the more recent
24 documentation?

25 A. I have.

68

1 **Q.** You are specific here in saying there were no
2 records of calls relating to scratchcards.
3 There were calls made reporting issues with the
4 Horizon system and with balancing though,
5 weren't there? We'll have a look at those.

6 So could we have on screen, please, document
7 reference RMG00000223. There are 57 log entries
8 relating to Mrs Palmer's branch on this log, by
9 my count.

10 Going, please, to the month of August 2005
11 the month that was raised interview, the first
12 entry is at line 29, 10 August 2005.

13 That's is, line 29.

14 So the detailed description column, which is
15 column E, for the 10 August first entry there,
16 says:

17 "How do we redeem a rem shortage out of
18 suspense."

19 Then the entry below says this:

20 "Incorrect stock descrep return form office
21 have remmed out stock."

22 Then in the resolution column, which is
23 column G:

24 "Advised office to check to see if she had
25 a minus figure advised to adjust the stock to
69

1 office as no one has called back from service
2 support.

3 "... system failure is in cap ..."

4 "... printer problems."

5 23 August:

6 "PM reported fault on system ... Engineer
7 brought printer but not accessories."

8 Going down again, another issue with trying
9 to have printer fixed.

10 So those are, aren't they, the technical
11 problems which Mrs Palmer was describing in the
12 interview; that log directly supports what she
13 was saying about what she was reporting in
14 August 2005.

15 **A.** Some of the issues on that log are related to
16 Horizon, yes.

17 **Q.** Had you requested the NBSC call logs when
18 Mrs Palmer first raised this issue in the
19 interview, they would have corroborated the
20 account she gave interview, wouldn't they, of
21 the problems she was experiencing and the
22 attempts she made in August 2005 to resolve
23 them?

24 **A.** There was an issue in 2005, which, obviously,
25 you can see that she has tried to resolve, yes.

71

1 correct amount then go to trial balance."

2 Are scratchcards counted as stock?

3 **A.** They are once they've been activated.

4 **Q.** So although the very few words used by the maker
5 of this log do not use the word "scratchcard"
6 why do you assume this call did not relate to
7 scratchcards?

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

9 **Q.** The 17 entries which follow are all dated August
10 2005. They set out the technical problems which
11 Mrs Palmer was encountering with the system,
12 don't they? We don't need to go through them
13 line by line but if you just cast an eye down?

14 **A.** Yes.

15 **Q.** Just scrolling down, please, if we can, you'll
16 see a reference on 18 August there to the
17 trouble with the printer that she was talking
18 about.

19 **A.** Yes.

20 **Q.** Then 19 August:

21 "Horizon system down stopped collection.
22 Unable to rem out. Too much cash now in the
23 office."

24 19th:

25 "PM says she will hold the money in the
70

1 **Q.** Do you think this might have put a different
2 complexion on the case, if the logs had been
3 obtained and looked at alongside her account
4 from the outset?

5 **A.** I think the transaction corrections were in
6 relation to transactions prior to August 2005,
7 if I believe. They were something like end of
8 April, maybe May time. So before the issue that
9 she's reported in August.

10 **Q.** In circumstances where Mrs Palmer was giving you
11 an account of having difficulties and saying
12 there were technical problems and she was
13 experiencing balancing issues, there was
14 an entry about stock and a discrepancy in stock.
15 The fact that there was a log supporting what
16 she was saying to you, would that have made any
17 difference to your assessment of the case?

18 **A.** Given the time, I wouldn't be able to answer
19 that now.

20 **Q.** Contacting the helplines was a reasonable line
21 of inquiry which you should have pursued at the
22 outset of the case, wasn't it?

23 **A.** Yes.

24 **Q.** It was also a reasonable line of inquiry to
25 request audit data from Fujitsu in this case,
72

1 wasn't it?
 2 **A.** Yes.
 3 **Q.** Do you accept that it was a failing in your
 4 investigation that you did not pursue those
 5 lines of inquiry?
 6 **A.** I'm not sure if having obtained them would have
 7 assisted any further but, obviously, having the
 8 data would have been, I suppose, making,
 9 I suppose, all reasonable lines of inquiry.
 10 **Q.** You've said that you don't specifically recall
 11 Mrs Palmer's trial. But on one specific point,
 12 Mrs Palmer remembers there being a question from
 13 the jury which was read out on the morning of
 14 the third day, in which the jury asked what
 15 Mrs Palmer was supposed to do if she didn't
 16 agree the figure that Horizon had produced. Do
 17 you recall that?
 18 **A.** I don't, no.
 19 **Q.** Mrs Palmer recalls that neither the prosecuting
 20 barrister nor anyone from the Post Office had
 21 an answer to that question. Again, do you
 22 recall any discussion of that at court?
 23 **A.** I don't, no.
 24 **Q.** Mrs Palmer was found not guilty on all three
 25 counts of false accounting by the jury. The

73

1 your statement and said that you didn't recall
 2 the issue.
 3 More recently, the Inquiry has provided you
 4 with two further documents relating to that
 5 issue. Could we have one of those on screen,
 6 please. The document reference is POL00169416.
 7 The top email here is an email from Jon Longman
 8 to you, dated 15 July 2010. It is entitled:
 9 "[Forward]: Duplication of Transaction
 10 Records in ARQ Returns."
 11 Would you agree it is forwarding on to you
 12 the email chain which follows further down the
 13 page?
 14 **A.** It would appear so, yes.
 15 **Q.** The email below is dated 2 July 2010. It is
 16 from Jane Owen to Jon Longman, forwarding to Jon
 17 Longman the chain beneath that.
 18 Over the page, please, we have an email from
 19 Jane Owen, also dated 2 July 2010 to Jason
 20 Collins and Andrew Daley, copied to Mark
 21 Dinsdale. It reads:
 22 "Dear Both
 23 "Please see email below from Penny Thomas.
 24 "Mark, Alan Simpson and myself have had
 25 a conference call today to look at potential

75

1 case closure report, which has been provided to
 2 you quite recently, records that the jury
 3 returned their verdict after 35 minutes.
 4 Mrs Palmer recalls it being less time than that.
 5 Is that something you recall, the speed with
 6 which the jury returned the not guilty verdict?
 7 **A.** I don't recall that, no.
 8 **Q.** We have heard evidence from Rob Wilson who was
 9 the Head of the Criminal Law Team, that there
 10 would usually be a review done by the Post
 11 Office where an acquittal was reported in a case
 12 it had prosecuted. First of all, do you recall
 13 that being right, that where there was
 14 an acquittal, there was a review done by the
 15 Post Office?
 16 **A.** I don't recall.
 17 **Q.** Do you recall there being any such review
 18 following the outcome in Mrs Palmer's case?
 19 **A.** I don't, no.
 20 **Q.** I'd like to turn, please, to the events in 2010
 21 and 2011. Ms Allen, you were sent a document by
 22 the Inquiry for the purposes of making your
 23 statement, which relates to the duplication of
 24 transaction records in ARQ returns, and you
 25 commented on that document at paragraph 76 of

74

1 problems that this is likely to cause. Firstly
 2 the suggested workaround will need to be put to
 3 our Legal Team and until that has been agreed,
 4 any further ARQ requests, including those which
 5 have already been submitted, will be suspended.
 6 "There are 2 cases currently with the
 7 court -- West Byfleet and Porters Avenue, and
 8 I will speak to Lisa and Jon about these as we
 9 need to know what in the way of ARQs and the
 10 corresponding statements have been presented to
 11 court. In addition, I have identified the
 12 following offices as ones that could potentially
 13 have already had information presented to the
 14 court."
 15 Has sight of this email chain helped at all
 16 with your recollection of this issue?
 17 **A.** I don't recall this at all.
 18 **Q.** The issue was described in the emails which
 19 follow this one. Have you had a chance to read
 20 through the email chain?
 21 **A.** I believe I have, if you can scroll up and have
 22 a look at it.
 23 **Q.** If you can just scroll down so we can see. Just
 24 scrolling down through, so that Ms Allen can see
 25 which email chain this is.

76

1 If we just stop there, please, going
 2 a little further up, would it be a fair summary
 3 to say that the issue being reported by Penny
 4 Thomas was a number of recent ARQ returns for
 5 use in prosecutions contained duplicated
 6 transaction records?

7 **A.** I believe so, yes.
 8 **Q.** What was your understanding, if you can say, of
 9 why you were being informed of the issue
 10 directly by Jon Longman; was it because of your
 11 involvement in either the West Byfleet or the
 12 Porters Avenue case?

13 If it assists, West Byfleet was the Seema
 14 Misra case and Porters Avenue was the Jerry Hosi
 15 case.

16 **A.** I would imagine it was because of the Jerry Hosi
 17 case because I wasn't actually involved in the
 18 Seema Misra case. I obviously did attend for
 19 the purposes of searching but I had no
 20 involvement after that point. So I would
 21 imagine it was in relation to the Hosi case.

22 **Q.** Can you recall how the question of what data had
 23 been presented to the court in those two cases
 24 and whether it was accurate was resolved?

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

77

1 which has been provided to you recently by the
 2 Inquiry.

3 Could we have that on screen, please. It's
 4 document reference POL00169419. This is
 5 an email dated 1 October 2010, from Jon Longman
 6 to Steve Bradshaw and to you. It is forwarding
 7 on an email chain about the Seema Misra case.

8 Do you know why you were being sent a copy
 9 of the defence expert's report in the case?
 10 That appears to be what is happening here.

11 We can go to it if we need to but the
 12 attachment to this email was one of the reports
 13 from the expert on behalf of the defence.

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

15 **Q.** Having seen the emails in this email chain, do
 16 you recall being aware that Ms Misra was
 17 challenging the integrity of the Horizon system
 18 and attributing shortfalls to it?

19 **A.** I was aware of that, yes.

20 **Q.** Could we have on screen, please, document
 21 reference POL00169422. This is an email from
 22 Jane Owen to you and a number of others. It is
 23 dated 18 January 2011. The subject line is
 24 "Urgent update required", and Ms Owen's email
 25 reads:

79

1 **Q.** If entries were being duplicated, that would
 2 affect the integrity of the audit data, wouldn't
 3 it?

4 **A.** Potentially, although I think from reading the
 5 emails, I think maybe Penny Thomas has said that
 6 it didn't affect -- it was just -- didn't affect
 7 the balances or anything, it was just duplicate
 8 transactions put into the log, or something
 9 along those lines.

10 **Q.** The data being produced to the court was
 11 incorrect, wasn't it, because it contained
 12 duplicate entries?

13 **A.** It was duplicated, yes.

14 **Q.** Did that concern you at the time, that incorrect
 15 data might have been provided to the court in
 16 support of prosecutions by the Post Office?

17 **A.** I don't recall this.

18 **Q.** You just can't recall?

19 **A.** No, I don't recall it at all.

20 **Q.** Thank you. That document can come down now.

21 You say in your statement that your
 22 involvement in the Seema Misra case was limited
 23 to assisting Jon Longman, the Officer in the
 24 Case, with searches of Ms Misra's home address.
 25 I'd just like to ask you about one document

78

1 "Dear All

2 "Can I please ask for your help urgently.

3 I have been asked to provide an update on the
 4 attached cases where Horizon integrity has come
 5 into question and need the information by
 6 tomorrow.

7 "I have checked against the spreadsheet but
 8 am unable to cover off the 'gaps' which are
 9 namely

10 "Court case details.

11 "Result

12 "Accused's defence (exactly).

13 "Could you either add into the spreadsheet
 14 using bright pink font as I have done in the
 15 recoveries column or just pop updates on
 16 an email and I will collate."

17 Ms Owen attached a spreadsheet. Could we
 18 have that on screen, please, it's POL00169423.
 19 If we can just scroll down, so we can see at
 20 a glance the entries on here.

21 On my count, this spreadsheet lists 20 cases
 22 where Horizon integrity has come into question,
 23 as Ms Owen described it. Ms Misra's case is one
 24 of these. So it would appear that, by January
 25 2011, you and a number of others were being made

80

1 aware there were at least 20 cases where Horizon
 2 integrity had come into question; is that right?
 3 **A.** I don't recall this document but, yes, looking
 4 at it, I would have been aware.
 5 **Q.** Do you recall receiving information about the
 6 number of cases where Horizon integrity was
 7 being challenged?
 8 **A.** I don't, no.
 9 **Q.** Could we have on screen, please, document
 10 reference POL00167369. This is an email from
 11 Graham Ward to a list of recipients including
 12 you. It is dated 14 April 2011. The subject
 13 line is "Credence versus Fujitsu".
 14 Mr Ward says this in his email:
 15 "All
 16 "If anyone has any evidence of disparities
 17 between Fujitsu and Credence transaction data,
 18 please get in touch (eg timing issues ...
 19 session numbers not matching for postage label
 20 transactions etc)."
 21 What was your understanding of why this
 22 enquiry was being made of you?
 23 **A.** I don't recall this request.
 24 **Q.** Do you recall being aware of any issue about
 25 a discrepancy or disparity between Fujitsu and

81

1 Horizon system, did you?
 2 **A.** Probably not, no.
 3 **Q.** Were you aware of a general message coming from
 4 within the Post Office, to the effect that the
 5 Horizon system was robust?
 6 **A.** I don't know where the information came from,
 7 but we was led to believe that there was no
 8 issues with the Horizon system.
 9 **Q.** When you say you were led to believe, who by?
 10 **A.** I don't know.
 11 **Q.** Was it within the Security Team or wider than
 12 that?
 13 **A.** I don't believe anybody in the Security Team
 14 thought there was an issue with the Horizon
 15 system and, obviously, when we had statements
 16 from Fujitsu saying that the system was robust,
 17 we never challenged it.
 18 **Q.** You say you never challenged it but, given the
 19 mounting number of cases in which Horizon
 20 integrity was being raised and thinking back to
 21 that January 2011 email with the 20 cases, do
 22 you think that you should have questioned it or
 23 challenged it, the party line that Horizon was
 24 robust?
 25 **A.** Possibly, but I don't know how we would have

83

1 Credence transaction data?
 2 **A.** I don't, no.
 3 **Q.** This would potentially be a significant issue,
 4 would it not, where Investigators were relying
 5 on Credence data, rather than having obtained
 6 ARQ data?
 7 **A.** Yes.
 8 **Q.** You don't recall it now but do you think you
 9 would have been concerned at the time about this
 10 issue?
 11 **A.** Potentially, yes.
 12 **Q.** Because it would make you question, wouldn't it,
 13 the reliability of the Credence data you were
 14 looking at to prove a loss and might make you
 15 more inclined to request further data?
 16 **A.** Possibly, yes.
 17 **Q.** Could we have on screen, please, paragraph 108
 18 of Ms Allen's statement. That's page 32. You
 19 say here:
 20 "I believed the Horizon system to be robust
 21 as documented in the relevant Fujitsu statements
 22 provided."
 23 You did not have a Fujitsu statement in
 24 every case you were involved in where shortfalls
 25 were being attributed to problems with the

82

1 gone about challenging that, as, obviously, we
 2 was getting the information from what we
 3 believed was an expert within Fujitsu, so
 4 I would have had no understanding of the
 5 Fujitsu -- of the workings of the Horizon
 6 system.
 7 **Q.** Regardless of what you were being led to believe
 8 about whether the Horizon system was robust, do
 9 you accept that you were under a duty as
 10 an Investigator to pursue reasonable lines of
 11 inquiry?
 12 **A.** Yes.
 13 **Q.** What was a reasonable line of inquiry was your
 14 call, wasn't it, nobody else's?
 15 **A.** It was.
 16 **Q.** So would you accept that reassurance from the
 17 business about Horizon could not have justified
 18 a decision not to pursue an otherwise reasonable
 19 line of inquiry?
 20 **A.** Well, I think the problem was we went to the
 21 expert to get the statement. The statement said
 22 the system was robust and we had no reason to
 23 disbelieve them. So I don't think we would have
 24 challenged it because we believed what they were
 25 saying.

84

1 Q. What about the cases where no further data was
2 sought from Fujitsu, and certainly no statement
3 was obtained, where that line of inquiry simply
4 wasn't pursued because you assumed the Horizon
5 system was robust?

6 If a subpostmaster raised with you interview
7 problems with Horizon, and attributed shortfalls
8 to it, how do you justify not pursuing the line
9 of inquiry -- we went over this earlier -- in
10 terms of going to the helpline or obtaining
11 data?

12 A. Yeah.

13 Q. What I'm saying is: a business message that
14 Horizon was robust, that simply couldn't have
15 justified a decision not to pursue otherwise
16 reasonable lines of inquiry, could it?

17 A. Maybe in hindsight we should have requested
18 Fujitsu logs in all cases to assist.

19 MS PRICE: Sir, those are all the questions I have
20 for Ms Allen. Do you have any questions before
21 I turn to Core Participants?

22 SIR WYN WILLIAMS: No, thank you. No.

23 MS PRICE: I think Mr Jacobs has questions, sir.

24 **Questioned by MR JACOBS**

25 MR JACOBS: Ms Allen, I appear for 156

85

1 investigation report?

2 A. It wasn't in the report but it was in the taped
3 transcript that was provided.

4 Q. Yes, but it wasn't in your report?

5 A. No, it wasn't in my report.

6 Q. Your investigation was inadequate, wasn't it?
7 Do you accept that now?

8 A. It was inadequate?

9 Q. Yes.

10 A. No. I don't accept that.

11 Q. Well, it was inadequate because you failed to
12 act in accordance with your duty as
13 an Investigator to conduct reasonable lines of
14 inquiry. Surely you must accept that?

15 A. There probably were more reasonable lines of
16 inquiry I could have made but I think I made the
17 reasonable lines of inquiry for the case at that
18 time. Hindsight is a wonderful thing.

19 Q. I don't want to go round in circles but you've
20 accepted that, where a subpostmaster or mistress
21 alleges shortfalls in the Horizon system, it is
22 a reasonable line of inquiry to request data to
23 support what the subpostmaster is saying and you
24 didn't do that and you didn't refer to it in
25 your report: so you didn't carry who reasonable

87

1 subpostmasters, all of whom have fallen foul of
2 the Post Office in relation to the Horizon
3 system and one of whom is Suzanne Palmer, who
4 sits to my left, who you investigated, and we
5 have been dealing with that in your evidence
6 this morning.

7 Now, this morning you accepted four things:
8 you accepted where subpostmasters allege that
9 shortfalls are due to problems with Horizon,
10 a reasonable line of inquiry would be to seek
11 audit data to explore whether that data might
12 support what the subpostmaster says, and you
13 agreed that was right.

14 A. Yes.

15 Q. You also accepted and acknowledged, when
16 Ms Price took you through the interview, that
17 Ms Palmer raised Horizon integrity issues at her
18 interview.

19 A. Yes, she raised issues with the Horizon system.

20 Q. You requested no data from Fujitsu, you
21 requested no data to check the integrity of the
22 Horizon terminal at her branch; that's right,
23 isn't it?

24 A. Yes.

25 Q. You omitted to mention the matter in your

86

1 lines of inquiry in this investigation, those
2 enquiries you did not undertake?

3 A. In this investigation, it wasn't a cash loss.

4 This investigation was related to scratchcards,
5 error notices and money placed into a private
6 ATM machine.

7 Q. The jury didn't accept that, did they?

8 A. They didn't, no.

9 Q. To be frank, my client finds it extraordinary
10 that you do not remember attending her trial.
11 You were there for three days. You gave
12 evidence at her trial. You were there, as
13 Ms Price has said, when the jury asked
14 a question "What is Mrs Palmer supposed to do if
15 she doesn't agree with the Horizon system?" You
16 and the Legal Team were floundering, you
17 couldn't answer that question, and the jury
18 acquitted my client between 10 and 35 minutes.
19 Surely you must remember that?

20 A. I remember going to Southend Crown Court but
21 I don't actually remember the trial.

22 Q. Do you remember that there was a petition with
23 600 signatures attesting to Mrs Palmer's good
24 character presented at the hearing?

25 A. I've read about it in documents.

88

1 **Q.** Are you aware that Post Office put pressure on
 2 Mrs Palmer's assistant not to give evidence to
 3 support her case because they said they might
 4 investigate her? Are you aware of anything
 5 surrounding that?

6 **A.** I've seen that in a document but I am not aware
 7 of that at all, no.

8 **Q.** Do you remember, between the audit and
 9 Mrs Palmer's interview with you, going to her
 10 shop, having an interview with her in her stock
 11 room, because she wasn't allowed into her post
 12 office, having a meeting with her and telling
 13 her that, if she paid the money back, the Post
 14 Office probably wouldn't prosecute?

15 **A.** No, I don't, but I believe at that time she'd
 16 already written a cheque and gave it to the
 17 Auditors, possibly. But I wouldn't have said
 18 that because that's not a decision that I make.

19 **Q.** Well, you said, in your view, you believed that
 20 if she paid the money back, the Post Office
 21 probably wouldn't prosecute?

22 **A.** I wouldn't say that because it's not my decision
 23 to make.

24 **Q.** She was worried that her cheque might bounce and
 25 so she came to the interview with you and

89

1 Do you accept, as the Investigator, that you
 2 have some role to play in what happened to her
 3 and some responsibility?

4 **A.** I didn't make any decisions regarding
 5 prosecution. I presented the case and the
 6 decision to prosecute was on the legal advice
 7 and the Designated Prosecution Authority.

8 **Q.** So no regret whatsoever from you? No --

9 **A.** I'm sorry that Mrs Palmer found herself in that
 10 position, yes, but the decision to prosecute was
 11 not mine.

12 **Q.** Do you think the decision to prosecute might
 13 have been a different decision if you had
 14 pursued the appropriate lines of inquiry and
 15 mentioned the issues that Mrs Palmer raised with
 16 the Horizon system in your report?

17 **A.** I don't --

18 **SIR WYN WILLIAMS:** We allow hypotheticals but
 19 I think that's putting it a bit too far,
 20 Mr Jacobs.

21 **MR JACOBS:** Sir, yes. I'll ask if I have any more
 22 questions.

23 I don't have anything else to add. Thank
 24 you.

25 **SIR WYN WILLIAMS:** Thank you. Anyone else?

91

1 Mr Chine with £9,000 in a bag, do you remember
 2 that?

3 **A.** I do recall her having some money with her, yes.

4 **Q.** Do you remember, three months after the
 5 interview, phoning her up and saying, "Oh,
 6 Mrs Palmer, not good news for you. They're
 7 going to prosecute you"; do you recall using
 8 those words?

9 **A.** I don't, no.

10 **Q.** Mrs Palmer recalls that very well. Do you
 11 accept that that would not have been
 12 an appropriate for professional way to behave?

13 **A.** I don't think I would have said it the way
 14 you've put it, no.

15 **Q.** Do you accept an Investigator saying those words
 16 would not have been appropriate and would not
 17 have been professional?

18 **A.** No, it wouldn't have been professional.

19 **Q.** Mrs Palmer was acquitted, she was completely
 20 vindicated. We understand that there was no
 21 review into her case, notwithstanding that the
 22 Post Office position of Horizon being robust was
 23 thoroughly disbelieved by the jury. She wasn't
 24 reinstated. She was bankrupt until 2016. This
 25 effectively has ruined her life.

90

1 **MS PRICE:** Sir, that appears to be all the further
 2 questions that there are.

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

4 Well, first of all, I hope that Mrs Palmer
 5 has found this morning's session informative.

6 Secondly, I'd like to thank you, Ms Allen,
 7 for making a witness statement and answering all
 8 the questions put to you this morning.

9 You will all be glad to hear that I don't
 10 propose to deliver an end of term report, so to
 11 speak, but there are two things that I'd like to
 12 say publicly before we break for the holiday.

13 The first is that I would like to pay
 14 tribute to all members of the Inquiry Team, that
 15 is barristers, solicitors, paralegals, trainee
 16 solicitors and anyone else who is not
 17 encompassed by those four categories, for the
 18 huge amount of work they have done over the last
 19 year to facilitate the smooth running of the
 20 Inquiry. That public admiration applies with
 21 equal force to every member of the Secretariat,
 22 in whatever role they have played. No Chairman
 23 could be more satisfied with the support he
 24 receives from his Inquiry Team. So that's
 25 a public tribute to you all.

92

1 I would also like to thank all the Core
 2 Participants and their representatives. To say
 3 that there has not been the occasional hiccup,
 4 for example in relation to disclosure, would be
 5 to go too far but I do wish to thank all the
 6 Core Participants and their representatives for
 7 the efficient way in which they conduct their
 8 part in this Inquiry.
 9 For various reasons, there has been a need
 10 for a great deal of flexibility and all the Core
 11 Participants and their representatives have
 12 demonstrated willingness to act flexibly to help
 13 me. For the help that I received from you all,
 14 I give you considerable thanks.
 15 It also remains for me to wish you a happy
 16 holiday, and I hope you celebrate this period in
 17 the way in which you all feel most appropriate.
 18 I know that I'm going to celebrate it in the way
 19 that I feel appropriate but I'm not going to
 20 declare publicly how that is.
 21 So thank you all very much and I'll see you
 22 on 11 January; is that correct, Ms Price?
 23 **MS PRICE:** Yes, sir, it is. Steve Bradshaw on
 24 11 January.
 25 **SIR WYN WILLIAMS:** Yes. All right then.

1 (12.22 pm)
 2 (The hearing adjourned until
 3 Thursday, 11th January 2024)
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 22
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 24
 25

INDEX

LISA JANE ALLEN (affirmed)	1
Questioned by MS PRICE	1
Questioned by MR JACOBS	85

<p>MR JACOBS: [2] 85/25 91/21</p> <p>MS PRICE: [14] 1/3 1/6 1/10 39/21 59/18 59/22 59/25 60/2 60/7 60/9 85/19 85/23 92/1 93/23</p> <p>SIR WYN WILLIAMS: [15] 1/5 1/7 38/22 39/14 39/19 59/20 59/23 60/1 60/3 60/8 85/22 91/18 91/25 92/3 93/25</p> <hr/> <p>'But [1] 50/8 'gaps' [1] 80/8 'I [3] 46/17 48/5 50/21 'I don't [1] 48/5 'I need [2] 46/17 50/21 'I've [1] 49/8 'Look [1] 53/7 'M' [1] 43/22 'odds' [1] 44/14 'Oh [1] 49/23 'S' [1] 43/22 'Surely [1] 49/25 'They've [1] 51/7 'training [1] 63/6 'Well [3] 51/4 51/21 51/22 'What [1] 50/7 'You [1] 48/8</p> <hr/> <p>1</p> <p>1 October 2010 [1] 79/5 10 [5] 11/24 16/15 65/19 69/15 88/18 10 August [1] 69/12 10 March 2006 [1] 60/14 10.00 [1] 1/2 100 [10] 26/17 42/11 42/11 42/12 42/13 52/20 52/20 53/6 55/1 55/1 100,000-odd [1] 49/8 108 [1] 82/17 11 [3] 7/3 24/20 66/2 11 January [2] 93/22 93/24 11 September [1] 64/21 11.22 [1] 60/4 11.35 [3] 60/2 60/3 60/6 11th January 2024 [1] 94/3 12 [2] 17/25 66/20 12.22 [1] 94/1</p>	<p>13 [2] 7/24 21/16 14 [2] 8/21 18/18 14 April 2011 [1] 81/12 14,700 [1] 41/2 14,712.11 [1] 60/24 15 [3] 9/3 66/1 66/9 15 July [1] 75/8 15 minutes [2] 59/24 59/25 156 [1] 85/25 17 [2] 28/4 70/9 17 October 2003 [1] 12/16 18 [1] 12/12 18 August [1] 70/16 18 January 2011 [1] 79/23 18 years [1] 58/13 19 [1] 70/20 1984 [1] 24/22 1986 [1] 2/25 1992 [3] 4/16 4/21 4/25 1995 [1] 3/4 1996 [2] 8/15 24/23 1998 [1] 24/25 19th [1] 70/24</p> <hr/> <p>2</p> <p>2 July 2010 [2] 75/15 75/19 2,500 [10] 44/9 46/23 46/24 47/2 47/15 52/6 52/6 55/25 56/12 56/22 2,520 [2] 66/23 67/8 20 [3] 80/21 81/1 83/21 20 December 2023 [1] 1/1 20 February 2006 [1] 55/8 20 September [1] 66/22 20 September 2005 [1] 67/5 2000 [8] 3/10 4/21 5/23 9/9 10/5 12/2 12/8 24/24 2002 [2] 8/22 24/24 2003 [1] 12/16 2005 [12] 42/9 66/1 66/10 67/5 67/21 69/10 69/12 70/10 71/14 71/22 71/24 72/6 2006 [10] 41/1 41/8 42/19 55/8 55/15 60/14 61/24 64/21 65/6 65/10 2010 [6] 32/16 74/20 75/8 75/15 75/19 79/5 2011 [6] 9/5 74/21</p>	<p>79/23 80/25 81/12 83/21 2012 [4] 4/4 4/6 9/10 12/8 2016 [1] 90/24 2023 [2] 1/1 1/15 2024 [1] 94/3 21 [2] 29/24 66/1 21 January 2010 [1] 32/16 21 September [1] 66/9 22 [2] 25/22 27/25 23 August [1] 71/5 250 [1] 53/13 253 [1] 48/18 26 [1] 41/15 26 July 2006 [1] 61/24 27 [2] 10/13 10/20 27 October [1] 1/15 28 [2] 11/23 11/25 29 [3] 16/9 69/12 69/13</p> <hr/> <p>3</p> <p>3 February [1] 41/1 30 [3] 16/13 16/17 37/1 31 [1] 37/3 32 [1] 82/18 33 [1] 1/15 34 [4] 24/19 24/21 25/13 47/12 35 [3] 25/1 74/3 88/18</p> <hr/> <p>4</p> <p>40 [2] 17/23 17/25 42 [1] 21/15 44 [1] 18/17 45 [1] 20/21 46 [1] 23/1</p> <hr/> <p>5</p> <p>5.00 [1] 45/13 500 [1] 51/3 55 [2] 28/2 28/4 57 [1] 69/7</p> <hr/> <p>6</p> <p>6 February [1] 41/8 6 February 2006 [2] 42/19 55/15 600 [2] 51/3 88/23</p> <hr/> <p>7</p> <p>74 [1] 30/4 75 [1] 30/25 76 [1] 74/25 78 [1] 36/14</p> <hr/> <p>8</p> <p>84 [1] 40/23</p>	<p>9</p> <p>9,000 [1] 90/1 9,000-odd [1] 58/16 9.00 [1] 45/12 90 [2] 41/14 58/1 90 days [1] 34/11</p> <hr/> <p>A</p> <p>A4 [1] 43/14 ability [1] 29/6 able [4] 36/11 48/10 48/11 72/18 about [38] 4/24 6/13 20/13 22/1 22/22 23/5 24/9 28/15 30/1 30/5 32/12 33/9 37/6 40/12 42/25 47/13 47/21 51/12 51/15 51/16 52/25 55/14 59/10 67/20 70/18 71/13 72/14 76/8 78/25 79/7 81/5 81/24 82/9 84/1 84/8 84/17 85/1 88/25 above [2] 26/12 63/18 Absolutely [1] 38/20 absorb [1] 14/19 accept [18] 20/15 21/21 22/6 29/13 30/13 30/19 42/4 47/11 73/3 84/9 84/16 87/7 87/10 87/14 88/7 90/11 90/15 91/1 accepted [5] 38/12 86/7 86/8 86/15 87/20 access [1] 25/8 accessories [1] 71/7 accordance [1] 87/12 account [13] 17/5 17/13 45/20 45/23 46/25 47/3 47/17 53/19 56/8 60/24 71/20 72/3 72/11 account' [1] 48/9 accountant [3] 33/5 33/13 33/18 accounted [2] 56/24 58/21 accounting [4] 20/18 58/17 60/21 73/25 accounts [1] 50/23 accurate [1] 77/24 Accused's [1] 80/12 acknowledged [1] 86/15 acquittal [2] 74/11 74/14 acquitted [2] 88/18 90/19 act [10] 8/4 8/14 8/15 8/19 24/23 24/23 24/24 24/25 87/12</p>	<p>93/12 acted [2] 21/7 41/10 action [2] 24/6 24/14 actioned [1] 63/24 activated [2] 45/9 70/3 actual [1] 29/16 actually [8] 9/15 19/21 27/22 27/24 28/25 46/4 77/17 88/21 add [5] 5/14 10/11 45/10 80/13 91/23 added [1] 14/17 addition [1] 76/11 additional [2] 26/19 36/19 address [8] 11/22 14/8 16/14 17/21 28/2 34/20 55/15 78/24 adhered [2] 24/22 25/3 adjourned [1] 94/2 adjust [1] 69/25 adjustment [1] 38/8 administrative [1] 3/8 admiration [1] 92/20 admitted [3] 20/10 20/13 57/1 advice [6] 20/23 24/10 26/25 62/9 62/14 91/6 advised [3] 57/18 69/24 69/25 advise [1] 63/22 advising [4] 3/23 19/6 31/10 31/19 affect [4] 38/12 78/2 78/6 78/6 affecting [2] 14/1 14/11 affirmed [2] 1/8 95/2 afford [1] 60/19 after [10] 10/9 11/21 16/5 17/21 18/1 50/25 59/2 74/3 77/20 90/4 again [6] 39/14 53/7 56/23 62/1 71/8 73/21 again' [1] 53/9 against [3] 3/16 19/20 80/7 ago [3] 53/4 56/2 58/13 agree [6] 44/12 48/5 57/6 73/16 75/11 88/15 agreed [3] 44/2 76/3 86/13 ah [1] 35/24 Alan [1] 75/24 all [50] 5/5 5/11 11/12 25/7 26/1 26/7 28/1 28/6 31/12 33/7</p>
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A	23/15 28/11 37/11 38/23 63/2 72/18 73/21 88/17 answering [3] 23/7 62/19 92/7 antecedents [1] 27/13 any [65] 2/6 2/10 6/3 6/8 6/12 6/18 9/7 9/11 9/13 9/25 11/4 11/7 14/15 15/14 16/3 17/18 21/12 23/4 25/15 26/4 27/10 27/11 28/12 28/14 28/18 29/10 31/7 32/3 33/20 38/7 38/15 39/24 40/11 40/17 40/17 41/17 41/25 46/4 49/10 50/10 54/8 58/3 58/5 58/5 59/14 61/17 61/19 61/20 62/23 63/4 64/2 67/14 67/18 68/5 68/9 72/16 73/7 73/22 74/17 76/4 81/16 81/24 85/20 91/4 91/21 anybody [2] 46/18 83/13 anyone [9] 5/19 5/24 6/2 11/10 59/13 73/20 81/16 91/25 92/16 anything [7] 44/6 46/16 46/18 49/6 78/7 89/4 91/23 anything' [1] 50/11 apart [2] 27/9 32/3 apologies [2] 14/6 32/14 apparent [6] 17/22 19/25 21/25 22/21 29/15 41/1 appear [4] 67/5 75/14 80/24 85/25 appears [5] 32/17 66/12 66/15 79/10 92/1 application [1] 6/24 applied [2] 6/21 37/23 applies [1] 92/20 applying [1] 65/17 appointment [1] 61/9 approach [1] 11/19 approaching [1] 8/1 appropriate [8] 23/10 23/13 62/20 90/12 90/16 91/14 93/17 93/19 April [5] 3/4 4/4 4/6 72/8 81/12 April 1995 [1] 3/4 April 2012 [1] 4/6 Aquatics [1] 50/8 are [45] 2/1 2/6 2/10	2/15 2/17 13/16 14/1 14/11 19/12 19/15 32/17 43/14 43/17 51/4 52/17 53/1 53/12 54/15 55/16 57/11 59/20 59/22 62/17 62/23 63/7 65/21 66/20 66/23 68/4 68/8 69/1 69/7 70/2 70/3 70/9 71/10 71/15 76/6 80/8 85/19 86/9 89/1 89/4 92/2 92/11 area [2] 13/22 18/5 aren't [2] 57/10 71/10 arising [1] 62/17 around [3] 12/1 12/7 12/12 ARQ [21] 30/1 30/5 31/1 31/4 31/7 32/3 34/15 35/8 36/14 36/17 36/22 37/24 38/25 58/22 59/8 67/23 74/24 75/10 76/4 77/4 82/6 ARQs [1] 76/9 Arrange [1] 19/9 arrangements [1] 41/7 arrested [1] 28/21 as [75] 2/22 2/25 3/12 3/24 5/13 7/4 7/13 7/16 11/14 12/3 12/19 13/1 13/7 17/6 18/3 20/23 21/7 21/13 22/13 22/16 22/20 22/20 23/15 23/23 26/3 26/12 26/14 27/20 30/6 30/10 31/2 31/4 31/8 33/10 33/24 36/23 37/25 38/1 39/23 40/5 41/10 42/14 42/15 43/19 44/13 47/1 54/18 54/19 54/20 56/8 56/10 57/23 58/16 58/20 58/20 61/9 62/3 63/18 65/4 65/18 66/2 67/22 68/23 70/2 71/1 76/8 76/12 80/14 80/23 82/21 84/1 84/9 87/12 88/12 91/1 ask [12] 11/15 38/4 38/22 39/6 39/11 44/23 51/12 52/16 61/19 78/25 80/2 91/21 asked [8] 13/8 31/1 38/24 43/25 55/23 73/14 80/3 88/13 asking [3] 2/23 39/5 59/7 asks [1] 47/13 assess [1] 18/6 assessed [1] 18/3	assessment [2] 19/2 72/17 assets [1] 3/17 assigned [2] 18/19 18/22 assist [3] 2/21 26/4 85/18 assistance [1] 56/5 assistant [2] 3/4 89/2 assisted [1] 73/7 assisting [1] 78/23 assists [1] 77/13 assume [1] 70/6 assumed [1] 85/4 at [120] ATM [2] 58/18 88/6 attached [3] 62/10 80/4 80/17 attachment [1] 79/12 attaining [1] 19/12 attempts [1] 71/22 attend [2] 18/8 77/18 attendance [1] 18/15 attended [3] 41/4 63/10 64/8 attending [3] 19/4 19/11 88/10 attesting [1] 88/23 attributed [2] 82/25 85/7 attributing [4] 30/7 30/16 39/22 79/18 audit [17] 14/11 17/6 17/22 18/1 19/17 19/17 30/21 33/24 35/13 40/25 43/8 58/15 61/21 72/25 78/2 86/11 89/8 Auditors [3] 19/21 61/7 89/17 August [20] 4/16 4/21 42/9 49/14 54/1 54/14 57/21 57/22 67/21 69/10 69/12 69/15 70/9 70/16 70/20 71/5 71/14 71/22 72/6 72/9 August 2005 [5] 42/9 67/21 69/10 71/22 72/6 authorised [1] 32/10 authority [5] 21/4 21/5 21/8 57/13 91/7 available [4] 33/22 35/21 62/24 64/4 Avenue [3] 76/7 77/12 77/14 aware [24] 6/2 6/3 6/8 6/12 9/23 13/1 16/2 22/20 29/18 34/1 34/14 34/17 34/18 38/15 54/8 79/16 79/19 81/1 81/4 81/24 83/3 89/1 89/4 89/6	away [6] 28/7 28/16 28/23 29/20 50/3 50/5 B back [23] 4/2 13/6 29/9 34/11 34/22 34/22 35/23 39/10 45/3 48/15 48/25 49/10 50/1 50/6 51/8 53/12 55/10 58/14 60/13 71/1 83/20 89/13 89/20 back' [1] 51/5 back-up [1] 49/10 background [1] 55/12 badgering [1] 51/1 bag [1] 90/1 balance [5] 4/14 38/8 50/15 53/15 70/1 balanced [1] 53/4 balances [1] 78/7 balancing [13] 4/12 5/7 9/22 53/22 54/5 54/12 54/19 55/1 57/8 57/23 59/12 69/4 72/13 banking [1] 50/10 bankrupt [1] 90/24 Barber [1] 10/21 barrister [1] 73/20 barristers [1] 92/15 based [3] 6/25 11/12 16/19 basically [2] 5/8 47/1 basis [1] 4/13 be [86] 2/23 9/23 13/1 13/10 13/14 14/18 17/6 18/2 18/3 18/13 18/16 18/21 18/23 19/3 19/13 19/20 19/21 20/8 20/8 20/9 20/10 20/11 20/16 21/13 22/2 22/9 22/16 22/18 22/23 23/10 23/12 24/6 24/16 29/14 31/9 32/9 33/1 33/3 33/8 34/3 34/8 35/2 35/4 36/1 36/5 36/11 36/18 38/25 39/15 40/12 46/12 48/11 49/17 56/7 56/14 57/16 59/7 59/14 60/1 61/2 61/5 62/10 62/18 62/24 63/10 63/13 63/15 63/18 63/19 63/23 64/13 66/20 72/18 74/10 76/2 76/5 77/2 79/10 82/3 82/20 86/10 88/9 92/1 92/9 92/23 93/4 bearing [1] 40/14 became [8] 3/4 4/21
----------	---	---	--	--

B	41/6 43/9 45/16 57/19 58/15 72/7 76/21 77/7 83/7 83/9 83/13 84/7 89/15	but [80] 1/25 4/2 4/15 5/23 9/11 9/12 9/21 11/13 15/12 16/7 25/19 28/19 29/2 29/9 31/5 31/12 31/16 32/1 33/1 33/16 34/17 34/25 36/1 38/3 39/1 44/12 44/15 45/12 45/25 46/3 46/20 48/9 48/18 49/3 49/21 50/13 51/11 51/7 52/1 53/3 53/5 53/11 54/10 54/18 57/10 58/14 59/1 59/4 64/3 64/13 64/14 66/13 67/7 67/16 67/17 70/13 71/7 73/7 73/11 77/19 79/11 80/7 81/3 82/8 83/7 83/18 83/25 87/2 87/4 87/16 87/19 88/20 89/6 89/15 89/17 91/10 91/18 92/11 93/5 93/19 Byfleet [3] 76/7 77/11 77/13	case [56] 16/5 16/25 17/15 18/3 18/4 18/17 18/19 20/7 20/9 20/11 20/22 20/23 20/25 21/3 21/19 24/5 24/12 26/2 26/5 28/10 28/19 32/16 32/19 37/11 40/6 40/23 41/11 55/6 56/16 60/22 64/1 64/4 72/2 72/17 72/22 72/25 74/1 74/11 74/18 77/12 77/14 77/15 77/17 77/18 77/21 78/22 78/24 79/7 79/9 80/10 80/23 82/24 87/17 89/3 90/21 91/5 cases [20] 15/11 15/18 15/21 17/6 26/1 30/6 30/15 30/19 31/14 38/2 76/6 77/23 80/4 80/21 81/1 81/6 83/19 83/21 85/1 85/18 Casework [9] 11/17 15/18 16/14 16/18 16/25 17/11 17/16 18/2 39/17 cash [19] 14/24 19/18 34/8 34/9 38/8 38/12 42/14 43/11 46/23 47/1 47/2 54/21 56/12 56/22 56/24 57/25 67/6 70/22 88/3 cash-on-hand [1] 56/22 cast [2] 66/14 70/13 categories [1] 92/17 cause [1] 76/1 causing [1] 41/22 caution [4] 19/10 20/3 20/12 41/8 cautioned [1] 18/13 celebrate [2] 93/16 93/18 cent [1] 26/17 Centre [1] 68/8 certainly [1] 85/2 cetera [1] 25/12 chain [7] 75/12 75/17 76/15 76/20 76/25 79/7 79/15 Chairman [1] 92/22 challenged [5] 81/7 83/17 83/18 83/23 84/24 challenging [2] 79/17 84/1 chance [5] 32/22 57/4 64/23 68/21 76/19 change [1] 5/6 changed [3] 12/4 15/11 23/23	changes [1] 14/11 character [1] 88/24 charge [7] 26/25 31/11 31/24 57/18 66/21 66/22 67/9 charged [1] 61/16 charging [1] 31/19 check [5] 15/19 17/15 39/24 69/24 86/21 checked [1] 80/7 checks [1] 17/3 cheque [2] 89/16 89/24 cheques [1] 29/4 Chester [1] 61/13 Chesterfield [1] 68/6 Chief [1] 13/2 Chine [7] 41/10 46/6 47/13 47/20 52/5 61/14 90/1 circles [1] 87/19 circumstances [9] 18/14 20/5 20/16 23/14 24/2 24/9 24/17 40/10 72/10 civil [1] 25/24 claim [1] 67/7 claimed [2] 55/24 56/13 clerk [4] 42/15 49/15 49/16 54/20 client [2] 88/9 88/18 closed [1] 46/15 closure [1] 74/1 CM1 [1] 13/25 Code [1] 8/18 coin [1] 43/17 collapsing [2] 13/17 14/9 collate [1] 80/16 Colleague [1] 12/25 collected [2] 19/3 32/2 collection [1] 70/21 Collins [2] 16/21 75/20 column [5] 69/14 69/15 69/22 69/23 80/15 come [17] 27/6 38/21 44/14 44/21 46/18 48/15 48/25 50/1 51/5 51/7 55/2 58/8 59/3 78/20 80/4 80/22 81/2 comes [1] 53/11 coming [2] 2/20 83/3 commence [1] 21/6 commencement [1] 7/25 comment [2] 32/18 41/21 commented [1] 74/25
	believed [6] 56/13 57/20 82/20 84/3 84/24 89/19 below [3] 69/19 75/15 75/23 beneath [1] 75/17 benefit [1] 33/3 benefited [1] 35/19 best [2] 2/16 29/6 between [12] 4/20 9/8 10/11 12/8 17/1 19/24 33/21 34/15 81/17 81/25 88/18 89/8 big [2] 11/12 28/21 bit [5] 30/12 46/22 53/1 53/3 91/19 body [1] 12/22 books [2] 25/18 25/18 both [5] 7/8 13/2 34/1 68/6 75/22 bottom [7] 12/19 12/23 38/6 49/20 51/18 53/2 55/7 bounce [1] 89/24 box [2] 50/5 50/13 Bradshaw [2] 79/6 93/23 branch [24] 3/4 4/16 5/15 5/19 5/25 14/25 19/14 19/20 19/22 20/3 22/23 24/15 33/22 35/17 38/18 38/19 38/19 40/1 40/25 41/2 41/4 59/16 69/8 86/22 branches [1] 4/12 break [3] 59/19 60/5 92/12 breakdown [1] 43/16 Brian [1] 16/20 Brief [1] 62/5 Briefly [1] 32/23 bright [1] 80/14 bring [2] 48/9 50/13 brought [6] 45/19 45/23 47/17 50/12 56/7 71/7 bullet [2] 14/3 14/8 bundle [3] 27/21 27/24 32/1 bundles [1] 43/24 burglary [1] 3/25 business [7] 3/17 6/23 12/8 40/3 68/8 84/17 85/13 businessmen' [1] 50/9 busy [1] 15/13	calculated [1] 14/20 call [6] 1/6 40/2 70/6 71/17 75/25 84/14 called [1] 71/1 calling [1] 67/23 calls [4] 68/9 68/22 69/2 69/3 came [8] 13/13 34/22 34/22 46/1 50/5 50/16 83/6 89/25 Camelot [4] 65/17 65/20 68/3 68/9 can [38] 1/3 1/5 10/11 12/17 14/21 16/19 24/13 28/19 30/2 33/1 36/1 38/8 38/21 38/22 39/10 39/12 39/13 51/25 60/7 60/11 60/13 64/25 65/1 66/13 66/20 70/15 71/25 76/21 76/23 76/23 76/24 77/8 77/22 78/20 79/11 80/2 80/19 80/19 can't [9] 45/1 45/2 45/16 48/5 48/6 50/10 50/10 54/22 78/18 cannot [2] 17/10 30/10 cap [1] 71/3 card [3] 10/24 17/5 17/13 carry [4] 50/7 50/11 50/18 87/25 carrying [2] 47/1 56/11	C calculated [1] 14/20 call [6] 1/6 40/2 70/6 71/17 75/25 84/14 called [1] 71/1 calling [1] 67/23 calls [4] 68/9 68/22 69/2 69/3 came [8] 13/13 34/22 34/22 46/1 50/5 50/16 83/6 89/25 Camelot [4] 65/17 65/20 68/3 68/9 can [38] 1/3 1/5 10/11 12/17 14/21 16/19 24/13 28/19 30/2 33/1 36/1 38/8 38/21 38/22 39/10 39/12 39/13 51/25 60/7 60/11 60/13 64/25 65/1 66/13 66/20 70/15 71/25 76/21 76/23 76/23 76/24 77/8 77/22 78/20 79/11 80/2 80/19 80/19 can't [9] 45/1 45/2 45/16 48/5 48/6 50/10 50/10 54/22 78/18 cannot [2] 17/10 30/10 cap [1] 71/3 card [3] 10/24 17/5 17/13 carry [4] 50/7 50/11 50/18 87/25 carrying [2] 47/1 56/11	

C	continually [1] 56/24	counter [13] 4/11	34/18 34/21 34/24	defendant [3] 62/22
Commercial [4]	contract [6] 22/15	5/15 5/18 9/18 19/14	34/25 35/3 35/5 35/10	63/1 63/17
10/16 13/17 13/21	23/21 24/4 39/9 61/11	19/19 33/22 35/4	35/20 36/1 36/4 36/7	Defendant's [1] 63/4
14/9	63/17	38/18 42/15 54/20	36/9 36/12 36/15	deficiency [1] 60/24
committal [4] 27/21	contracts [7] 18/20	63/11 65/19	36/17 36/22 37/10	definition [1] 8/4
27/22 27/24 32/1	21/18 21/20 22/5 23/3	counter-printed [1]	37/24 38/2 38/25 39/6	Deirdre [1] 46/2
communications [3]	23/8 23/18	19/19	44/6 58/22 59/8 61/21	deliver [1] 92/10
13/2 13/25 25/12	convenient [1] 59/18	counters [1] 7/1	67/23 72/25 73/8	delivered [2] 7/12
compatible [1] 50/14	conviction [2] 21/2	counting [3] 42/14	77/22 78/2 78/10	7/18
compensate [1]	60/20	54/21 57/24	78/15 81/17 82/1 82/5	Delivery [1] 34/19
56/14	copied [5] 60/15 62/3	counts [1] 73/25	82/6 82/13 82/15 85/1	demonstrated [1]
compensating [3]	63/15 63/18 75/20	course [17] 7/6 7/10	85/11 86/11 86/11	93/12
51/10 56/25 57/24	copies [1] 25/14	7/21 8/7 8/11 8/16 9/4	86/20 86/21 87/22	depend [2] 20/5
completed [3] 4/13	copy [6] 1/13 1/18	10/2 30/6 30/11 31/3	database [5] 25/6	37/11
7/5 55/5	61/10 62/6 62/9 79/8	31/5 32/2 39/24 40/5	25/8 25/10 25/17	depending [2] 18/13
completely [1] 90/19	Core [4] 85/21 93/1	59/4 65/1	25/21	40/10
completing [2] 26/6	93/6 93/10	court [13] 8/22 8/24	databases [5] 25/3	deposits [1] 5/9
64/5	Corporate [3] 25/10	60/23 64/8 73/22 76/7	25/4 25/5 25/6 25/9	descrap [1] 69/20
completion [1] 8/3	25/17 25/20	76/11 76/14 77/23	date [4] 16/24 55/8	describe [2] 7/12
complexion [1] 72/2	correct [10] 2/5 3/3	78/10 78/15 80/10	56/15 56/21	33/10
compliance [4] 10/23	3/6 3/11 9/6 17/20	88/20	dated [13] 1/14 12/16	described [3] 66/25
15/19 17/3 17/15	42/23 53/15 70/1	cover [2] 56/23 80/8	32/16 60/14 61/24	76/18 80/23
compliant [1] 10/25	93/22	covered [3] 7/24 8/10	64/21 70/9 75/8 75/15	describing [1] 71/11
computer [6] 5/6	correction [2] 38/10	67/13	75/19 79/5 79/23	description [2] 34/8
5/10 5/12 9/20 50/13	58/19	covering [4] 8/13	81/12	69/14
66/5	corrections [4] 2/6	8/14 8/18 67/12	dates [1] 66/6	Designated [4] 2/14
computerised [4]	2/10 47/9 72/5	covers [2] 65/2 66/8	Dave [1] 16/20	21/7 57/12 91/7
4/17 4/24 5/3 5/8	corresponding [1]	CPIA [2] 25/18 28/6	David [1] 13/3	detailed [3] 30/21
concern [1] 78/14	76/10	Credence [10] 33/23	day [6] 5/12 9/17	53/19 69/14
concerned [1] 82/9	corroborated [1]	34/1 34/5 35/4 35/15	41/5 43/8 55/25 73/14	details [1] 80/10
conclusion [1] 13/13	71/19	81/13 81/17 82/1 82/5	day's [1] 9/24	dial [1] 46/5
conduct [3] 9/8 87/13	cost [4] 33/2 36/2	82/13	days [4] 34/11 37/1	did [57] 3/14 3/20 5/6
93/7	36/3 36/19	crime [6] 3/24 13/18	37/3 88/11	5/15 5/18 5/24 6/17
conducted [1] 55/13	could [59] 1/10 1/15	14/2 14/5 24/24 29/1	deal [9] 15/21 18/16	7/7 9/4 9/7 11/2 11/5
conducting [6] 16/1	11/23 12/13 13/9	criminal [34] 3/16	40/22 46/3 61/4 62/11	11/6 11/10 11/15 15/6
21/11 26/7 28/1 36/23	13/14 16/14 17/24	6/18 6/19 8/4 8/10	63/20 65/16 93/10	15/14 15/23 16/12
37/15	19/13 20/20 21/15	8/13 8/15 9/8 16/5	dealing [6] 10/19	19/25 21/11 26/10
conference [1] 75/25	23/16 24/19 25/19	17/8 18/10 19/10 20/2	17/4 39/8 56/5 61/8	26/18 29/5 29/5 29/9
confirm [2] 1/10	25/22 28/3 29/24	21/22 22/8 22/13 24/9	86/5	34/3 34/24 35/2 35/7
62/21	32/11 33/4 33/13	24/14 24/22 25/24	deals [1] 63/12	36/3 39/23 41/13 42/6
conscious [2] 36/21	34/18 34/25 35/2 35/3	27/5 31/9 31/18 31/22	dealt [1] 63/13	46/17 49/25 54/4
37/4	35/14 35/15 35/21	32/5 40/21 55/18	Dear [3] 12/25 75/22	55/21 56/10 56/23
consider [7] 19/25	35/23 38/4 40/12	57/17 58/12 58/24	80/1	58/22 59/6 59/6 59/12
36/3 57/13 58/22 59/7	41/14 42/13 42/17	59/5 60/12 62/1 74/9	December [1] 1/1	61/19 61/21 68/13
59/13 61/18	42/24 43/13 47/12	criminally [1] 22/2	decide [2] 20/25 21/4	68/16 68/17 70/6 73/4
considerable [1]	48/19 53/10 54/23	Crown [3] 3/1 60/23	decided [4] 21/20	77/18 78/14 82/23
93/14	55/3 60/9 61/23 62/10	88/20	22/6 23/8 37/16	83/1 88/2 88/7
consideration [3]	62/13 63/2 64/18 69/6	currently [1] 76/6	deciding [3] 36/5	didn't [24] 9/12 9/20
2/11 18/25 19/6	75/5 76/12 79/3 79/20	customers [2] 13/11	36/22 37/9	11/13 20/15 34/25
considered [2] 41/19	80/13 80/17 81/9	14/23	decision [17] 21/12	35/10 35/12 44/11
57/17	82/17 84/17 85/16	cut [1] 14/3	23/4 23/5 23/23 37/18	47/11 50/4 50/13
consisted [1] 12/6	87/16 92/23	cuts [1] 14/1	37/19 39/16 57/14	57/15 57/19 58/9
contact [5] 11/18	could've [1] 53/10	D	60/25 84/18 85/15	73/15 75/1 78/6 78/6
18/23 19/7 46/1 58/9	couldn't [9] 46/14	daily [3] 4/15 55/24	89/18 89/22 91/6	87/24 87/24 87/25
contacted [2] 68/3	46/18 47/10 49/5 49/6	56/12	91/10 91/12 91/13	88/7 88/8 91/4
68/6	50/15 53/11 85/14	Daley [1] 75/20	decisions [3] 22/1	difference [4] 19/24
contacting [2] 68/4	88/17	data [69] 10/2 17/4	22/22 91/4	34/14 34/17 72/17
72/20	counsel [3] 37/20	17/19 24/24 30/1 30/5	declare [1] 93/20	differences [1] 33/21
contain [1] 63/12	62/6 63/22	30/21 30/22 31/1 31/4	declined [1] 42/21	different [8] 14/19
contained [2] 77/5	counsel's [2] 62/9	31/7 32/4 33/1 33/4	deemed [2] 23/10	34/2 34/3 34/4 34/13
78/11	62/13	33/10 33/12 33/16	23/12	40/15 72/1 91/13
contents [1] 2/15	count [4] 53/7 53/9	33/21 33/23 33/24	defence [8] 26/5 31/6	difficulties [4] 6/4
context [1] 23/6	69/9 80/21	34/1 34/5 34/12 34/16	32/19 33/5 37/21 79/9	54/5 59/11 72/11
	counted [1] 70/2		79/13 80/12	difficulty [1] 53/22

<p>D</p> <p>Dinsdale [1] 75/21</p> <p>direct [1] 13/23</p> <p>direction [1] 37/20</p> <p>directly [2] 71/12 77/10</p> <p>director [1] 13/3</p> <p>disagreed [1] 44/19</p> <p>disbelieve [1] 84/23</p> <p>disbelieved [1] 90/23</p> <p>disclosed [2] 36/6 68/22</p> <p>disclosure [13] 8/9 25/24 26/2 26/3 26/6 26/11 26/15 27/12 27/14 27/15 31/23 32/18 93/4</p> <p>discrepancy [2] 72/14 81/25</p> <p>discussed [1] 14/12</p> <p>discussion [2] 51/15 73/22</p> <p>dismissed [1] 23/19</p> <p>disparities [1] 81/16</p> <p>disparity [1] 81/25</p> <p>distinct [2] 26/11 26/19</p> <p>do [77] 1/18 1/19 8/9 8/13 8/14 8/18 15/9 16/3 17/13 17/25 23/3 23/21 26/21 27/14 30/12 33/15 35/19 35/22 38/7 39/3 39/4 41/17 41/24 42/3 42/5 43/19 49/6 49/12 50/7 50/7 50/10 50/10 50/15 53/18 56/9 58/2 59/2 59/23 64/7 64/10 64/16 66/12 66/13 69/17 70/5 70/6 72/1 73/3 73/15 73/16 73/21 74/12 74/17 79/8 79/15 81/5 81/24 82/8 83/21 84/8 85/8 85/20 87/7 87/24 88/10 88/14 88/22 89/8 90/1 90/3 90/4 90/7 90/10 90/15 91/1 91/12 93/5</p> <p>doc [1] 41/19</p> <p>document [25] 2/1 2/18 12/13 32/11 32/22 38/5 38/21 42/19 42/24 47/13 55/3 55/7 57/16 60/9 69/6 74/21 74/25 75/6 78/20 78/25 79/4 79/20 81/3 81/9 89/6</p> <p>documentation [6] 19/5 19/12 26/14 27/1 27/8 68/24</p> <p>documented [1] 82/21</p>	<p>documents [14] 1/23 2/3 2/8 2/12 19/15 27/12 27/14 32/6 32/7 32/9 32/20 33/16 75/4 88/25</p> <p>does [6] 22/4 35/12 37/10 41/21 46/11 63/11</p> <p>doesn't [4] 9/11 46/3 52/1 88/15</p> <p>doing [2] 9/8 27/21</p> <p>don't [61] 6/11 6/15 8/12 8/17 9/11 9/12 9/15 16/7 22/3 22/9 22/24 23/16 23/24 24/12 28/11 28/18 29/10 29/12 31/12 31/20 48/5 59/1 59/9 64/1 64/13 67/15 67/17 67/25 70/8 70/12 70/12 73/10 73/18 73/23 74/7 74/16 74/19 76/17 77/25 78/17 78/19 79/14 81/3 81/8 81/23 82/2 82/8 83/6 83/10 83/13 83/25 84/23 87/10 87/19 88/21 89/15 90/9 90/13 91/17 91/23 92/9</p> <p>done [10] 4/13 27/5 27/23 40/5 45/20 53/8 74/10 74/14 80/14 92/18</p> <p>doubt [1] 33/9</p> <p>down [34] 5/9 12/18 14/10 30/2 32/13 38/21 41/22 42/9 42/11 42/25 46/18 47/13 49/2 51/15 53/1 54/17 55/2 55/11 55/14 56/18 57/23 61/25 62/15 65/1 66/14 70/13 70/15 70/21 71/8 75/12 76/23 76/24 78/20 80/19</p> <p>DPA [1] 21/6</p> <p>draft [1] 64/21</p> <p>drive [1] 13/6</p> <p>due [3] 38/3 59/4 86/9</p> <p>duplicate [2] 78/7 78/12</p> <p>duplicated [3] 77/5 78/1 78/13</p> <p>duplication [2] 74/23 75/9</p> <p>during [1] 66/5</p> <p>duties [1] 26/19</p> <p>duty [5] 26/21 26/22 28/10 84/9 87/12</p>	<p>E</p> <p>each [5] 12/6 14/16 14/18 20/6 55/25</p> <p>earlier [4] 49/18 52/23 65/5 85/9</p> <p>easier [1] 34/9</p> <p>ECCO [1] 5/4</p> <p>Edgely [2] 68/15 68/19</p> <p>effect [3] 15/17 63/6 83/4</p> <p>effectively [1] 90/25</p> <p>efficient [1] 93/7</p> <p>eg [1] 81/18</p> <p>eg timing [1] 81/18</p> <p>eight [2] 44/3 51/16</p> <p>either [4] 19/8 39/12 77/11 80/13</p> <p>else [3] 91/23 91/25 92/16</p> <p>else's [1] 84/14</p> <p>email [22] 12/14 12/23 32/13 75/7 75/7 75/12 75/15 75/18 75/23 76/15 76/20 76/25 79/5 79/7 79/12 79/15 79/21 79/24 80/16 81/10 81/14 83/21</p> <p>emails [4] 49/21 76/18 78/5 79/15</p> <p>employed [2] 4/7 22/17</p> <p>employing [3] 22/10 22/19 23/17</p> <p>enclosed [1] 62/7</p> <p>enclosing [1] 55/17</p> <p>encompassed [1] 92/17</p> <p>encountering [1] 70/11</p> <p>end [4] 5/12 7/20 72/7 92/10</p> <p>Engineer [1] 71/6</p> <p>enhanced [3] 35/8 35/10 35/13</p> <p>enquiries [8] 17/5 17/13 18/23 28/24 42/2 58/5 61/20 88/2</p> <p>enquiry [2] 40/12 81/22</p> <p>ensue [3] 21/23 22/8 22/14</p> <p>ensuring [1] 10/24</p> <p>enter [1] 5/11</p> <p>entered [3] 34/20 66/4 66/21</p> <p>entering [3] 54/21 54/23 67/4</p> <p>entitled [1] 75/8</p> <p>entries [7] 8/5 55/23 69/7 70/9 78/1 78/12 80/20</p>	<p>entry [7] 55/25 66/17 67/12 69/12 69/15 69/19 72/14</p> <p>equal [1] 92/21</p> <p>erratic [1] 53/3</p> <p>error [35] 43/25 44/10 44/19 45/8 45/19 47/3 47/16 48/1 51/3 51/6 51/7 51/12 51/16 52/2 52/8 56/1 56/2 56/9 56/11 56/13 56/20 56/25 57/1 62/25 66/17 66/21 66/22 67/4 67/7 67/9 67/13 68/5 68/7 68/10 88/5</p> <p>errors [4] 49/25 51/4 57/24 62/23</p> <p>establish [3] 13/9 18/9 18/24</p> <p>et [1] 25/12</p> <p>et cetera [1] 25/12</p> <p>etc [2] 33/6 81/20</p> <p>even [4] 37/2 40/8 49/21 50/15</p> <p>evening [1] 43/19</p> <p>event [2] 35/14 61/5</p> <p>events [1] 74/20</p> <p>eventually [1] 12/11</p> <p>ever [9] 5/15 9/25 11/6 15/23 23/21 24/12 28/14 33/20 67/11</p> <p>every [7] 37/1 40/6 43/19 45/18 54/24 82/24 92/21</p> <p>everything [4] 25/11 32/6 50/24 52/13</p> <p>evidence [21] 8/4 8/14 8/24 15/25 19/3 20/1 20/18 21/1 27/11 60/19 61/4 62/9 63/8 63/9 63/23 64/9 74/8 81/16 86/5 88/12 89/2</p> <p>ex [1] 42/15</p> <p>ex-counter [1] 42/15</p> <p>exactly [1] 80/12</p> <p>exam [1] 7/20</p> <p>examined [1] 13/12 15/2 24/11 27/6 28/19 29/8 29/22 67/21 93/4</p> <p>exception [1] 3/7</p> <p>Executive [1] 13/2</p> <p>exercise [1] 13/7</p> <p>exercises [4] 12/10 15/3 15/7 15/15</p> <p>exhaustive [1] 7/23</p> <p>exhibited [3] 32/8 68/15 68/18</p> <p>exhibits [1] 61/15</p> <p>expected [1] 16/4</p> <p>experience [4] 6/18 6/25 17/14 63/5</p>	<p>experienced [1] 54/20</p> <p>experiencing [7] 6/4 47/6 53/21 54/6 59/11 71/21 72/13</p> <p>expert [3] 79/13 84/3 84/21</p> <p>expert's [1] 79/9</p> <p>explain [4] 3/19 43/14 55/23 65/21</p> <p>explained [5] 46/21 47/16 54/18 57/23 58/16</p> <p>explanation [5] 19/9 20/8 20/14 28/23 34/6</p> <p>explore [2] 30/21 86/11</p> <p>exploring [2] 14/19 30/12</p> <p>expressing [1] 33/8</p> <p>extended [1] 29/20</p> <p>extent [2] 24/13 35/1</p> <p>external [2] 3/24 13/18</p> <p>extra [1] 34/24</p> <p>extract [3] 61/10 65/22 66/7</p> <p>extraordinary [1] 88/9</p> <p>eye [2] 66/14 70/13</p> <hr/> <p>F</p> <p>face [2] 20/15 32/17</p> <p>facilitate [1] 92/19</p> <p>facility [2] 38/7 38/17</p> <p>fact [2] 22/11 72/15</p> <p>factor [3] 22/1 22/21 36/5</p> <p>factors [1] 20/17</p> <p>facts [2] 18/9 18/24</p> <p>failed [1] 87/11</p> <p>failing [1] 73/3</p> <p>failure [1] 71/3</p> <p>fair [1] 77/2</p> <p>fallen [1] 86/1</p> <p>false [3] 20/18 60/21 73/25</p> <p>far [6] 22/20 24/12 45/2 58/20 91/19 93/5</p> <p>fault [1] 71/6</p> <p>FBC [2] 46/10 46/11</p> <p>featuring [1] 8/7</p> <p>February [5] 41/1 41/8 42/19 55/8 55/15</p> <p>feel [3] 46/22 93/17 93/19</p> <p>feeling [1] 6/9</p> <p>few [4] 47/19 47/21 62/17 70/4</p> <p>fifth [1] 14/2</p> <p>figure [5] 38/13 47/1 56/22 69/25 73/16</p> <p>figures [1] 53/5</p> <p>files [1] 17/4</p>
--	--	---	--	---

F	35/20 36/1 36/4 36/7 36/18 36/22 37/10 38/17 39/3 39/9 58/22 59/7 61/21 65/25 67/12 72/25 81/13 81/17 81/25 82/21 82/23 83/16 84/3 84/5 85/2 85/18 86/20	25/1 42/24 43/25 44/12 47/12 66/13 70/1 70/12 79/11 87/19 93/5 goes [5] 12/16 50/19 51/12 52/20 61/4 going [33] 12/22 15/19 23/1 29/9 30/25 32/9 41/22 42/9 44/15 44/24 48/25 50/23 50/25 51/4 55/6 55/10 55/13 55/22 56/17 60/10 60/13 62/15 65/24 66/14 69/10 71/8 77/1 85/10 88/20 89/9 90/7 93/18 93/19	91/13 hadn't [1] 20/13 halfway [3] 32/12 47/13 55/14 hand [4] 19/15 33/23 56/12 56/22 hands [1] 29/21 hang [1] 50/25 happened [6] 42/15 46/21 48/1 49/12 58/8 91/2 happening [1] 79/10 happy [1] 93/15 hard [2] 1/13 58/14 has [29] 20/6 44/24 45/4 56/15 57/2 60/25 62/5 63/5 64/4 67/6 67/8 68/22 71/1 71/25 74/1 75/3 76/3 76/15 78/5 79/1 80/4 80/22 81/16 85/23 88/13 90/25 92/5 93/3 93/9	58/5 58/9 61/20 72/20 her [31] 28/22 28/22 44/21 48/4 48/4 48/7 55/1 56/12 56/22 57/8 63/2 72/3 86/17 86/22 88/10 88/12 89/3 89/4 89/9 89/10 89/10 89/11 89/12 89/13 89/24 90/3 90/3 90/5 90/21 90/25 91/2 here [22] 17/16 19/11 20/21 21/16 23/2 25/4 28/8 33/8 41/16 43/20 48/5 49/10 50/21 51/2 51/24 53/5 53/20 69/1 75/7 79/10 80/20 82/19 here' [2] 46/17 49/8 herewith [1] 62/7 herself [1] 91/9 hiccup [1] 93/3 hindsight [2] 85/17 87/18 his [3] 63/24 81/14 92/24 history [2] 39/25 40/13 hold [2] 39/12 70/25 holding [5] 26/18 47/18 48/14 49/6 57/3 holiday [2] 92/12 93/16 home [1] 78/24 hope [3] 48/14 92/4 93/16 hoping [1] 56/25 Horizon [67] 5/16 5/19 5/22 5/25 6/5 6/10 9/13 9/25 10/2 11/3 11/8 11/16 17/18 19/13 19/19 30/8 30/17 33/21 37/10 39/23 39/25 40/3 40/14 41/18 42/3 42/6 53/21 54/6 54/8 54/11 57/20 58/10 59/15 63/14 66/5 67/20 69/4 70/21 71/16 73/16 79/17 80/4 80/22 81/1 81/6 82/20 83/1 83/5 83/8 83/14 83/19 83/23 84/5 84/8 84/17 85/4 85/7 85/14 86/2 86/9 86/17 86/19 86/22 87/21 88/15 90/22 91/16 Hosi [4] 32/16 77/14 77/16 77/21 how [17] 5/6 22/4 25/8 29/3 32/4 33/19 34/3 34/4 44/24 45/2 47/17 63/13 69/17 77/22 83/25 85/8 93/20
final [2] 64/22 68/1 finally [1] 50/12 financial [4] 9/4 16/10 19/6 29/16 find [2] 25/14 25/19 finds [1] 88/9 fine [1] 60/3 first [18] 4/11 6/5 10/19 13/16 14/13 33/7 35/25 40/24 42/18 55/10 55/12 65/16 69/11 69/15 71/18 74/12 92/4 92/13 Firstly [1] 76/1 fit [2] 22/4 22/16 five [2] 10/14 14/5 fix [1] 49/3 fixed [1] 71/9 flexibility [1] 93/10 flexibly [1] 93/12 floundering [1] 88/16 Focusing [1] 32/24 follow [3] 35/12 70/9 76/19 followed [1] 17/21 following [12] 13/15 14/3 14/4 15/24 28/15 40/25 54/24 58/10 58/23 63/9 74/18 76/12 follows [4] 62/4 66/12 66/15 75/12 font [1] 80/14 force [1] 92/21 forgotten [1] 50/25 form [3] 26/16 38/2 69/20 formerly [1] 13/21 forms [2] 8/3 27/12 Forward [1] 75/9 forwarding [3] 75/11 75/16 79/6 foul [1] 86/1 found [4] 19/21 73/24 91/9 92/5 four [4] 14/6 14/6 86/7 92/17 frame [2] 16/3 51/16 frank [1] 88/9 fraud [2] 10/16 28/22 Friday [1] 43/6 friend [1] 42/22 friends [1] 5/21 front [1] 1/13 frontline [1] 14/24 Fujitsu [45] 11/19 11/19 17/4 17/12 17/17 17/19 29/22 30/2 30/6 30/21 31/2 33/1 33/10 33/12 33/24 34/2 34/16 35/3	full [11] 1/10 22/25 33/1 33/3 33/10 34/15 36/1 36/9 36/25 37/3 38/25 fully [2] 28/11 29/13 function [2] 13/18 14/11 functions [4] 13/19 13/22 14/2 14/10 funds [3] 56/10 56/23 61/12 further [33] 13/4 13/9 13/14 14/1 14/10 15/24 15/25 18/23 24/6 24/6 24/13 29/3 30/3 30/12 30/22 33/12 42/1 56/13 61/2 62/16 63/8 63/22 64/3 65/9 66/7 73/7 75/4 75/12 76/4 77/2 82/15 85/1 92/1	gone [2] 45/4 84/1 good [5] 1/3 21/24 59/23 88/23 90/6 got [14] 39/11 43/16 45/14 48/2 49/8 49/24 50/9 50/21 50/22 50/22 52/12 52/13 52/14 53/5 Graham [2] 16/20 81/11 Grange [1] 66/1 grateful [2] 62/10 62/18 great [1] 93/10 green [2] 28/21 29/4 group [5] 13/5 25/5 25/7 25/20 29/1 guidance [6] 8/23 28/9 28/12 28/14 29/7 29/11 guilty [2] 73/24 74/6 guy [1] 46/1	having [22] 2/7 15/21 21/24 23/4 27/5 28/22 30/13 53/22 54/11 54/12 58/5 59/12 64/2 66/25 72/11 73/6 73/7 79/15 82/5 89/10 89/12 90/3 he [9] 10/7 10/8 41/13 49/21 50/5 50/16 61/6 61/21 92/23 he's [1] 46/1 Head [4] 10/5 10/10 12/15 74/9 headcount [6] 12/9 13/5 15/3 15/6 15/13 15/14 headed [1] 10/21 heading [2] 12/5 25/24 hear [3] 1/3 60/7 92/9 heard [1] 74/8 hearing [2] 88/24 94/2 held [6] 19/22 25/7 26/12 33/24 34/16 35/3 Hello [1] 60/7 help [9] 33/13 46/14 46/17 47/7 50/21 67/23 80/2 93/12 93/13 Helpdesk [4] 40/4 41/25 58/3 58/10 helped [1] 76/15 helpline [6] 46/8 46/10 47/8 50/2 54/1 85/10 helplines [5] 40/15	
G	gain [3] 33/6 33/13 33/18 gathered [1] 19/1 gathering [1] 15/24 gave [6] 34/5 34/7 53/25 71/20 88/11 89/16 general [2] 37/24 83/3 generally [1] 52/18 Gerrish [1] 10/12 get [8] 34/23 34/25 46/18 50/3 51/10 54/25 81/18 84/21 getting [2] 24/12 84/2 giro [3] 28/21 28/21 29/4 giros [2] 49/5 50/23 give [5] 10/23 28/19 64/9 89/2 93/14 given [19] 9/13 9/24 9/25 18/25 19/6 20/14 28/14 28/18 29/3 29/8 29/10 33/20 37/20 43/6 59/10 67/19 67/25 72/18 83/18 given' [1] 63/7 giving [4] 8/24 28/22 53/19 72/10 glad [1] 92/9 glance [1] 80/20 gleaned [1] 35/3 go [13] 11/17 24/5	had [78] 1/25 2/7 4/17 5/21 9/18 12/9 15/17 17/7 17/8 17/14 18/1 18/10 18/10 18/17 18/19 18/22 19/21 20/14 22/25 24/10 24/16 25/10 26/20 26/21 27/10 31/8 31/16 32/2 32/7 32/21 34/23 35/14 35/16 36/8 37/12 37/18 37/20 38/4 38/24 43/5 44/11 44/12 44/18 45/9 46/15 47/7 49/1 49/3 49/4 49/10 50/11 52/6 52/6 53/24 53/24 53/24 54/14 56/4 56/7 57/4 64/23 68/21 69/24 71/17 72/2 73/16 73/20 74/12 75/24 76/13 76/19 77/19 77/22 81/2 83/15 84/4 84/22		

H	26/20 26/21 34/23 36/8 44/11 49/4 50/11 77/19	84/20 85/23 87/16 91/19	59/18 62/10 62/23 63/14 65/1 65/12 65/13 67/18 69/24 70/13 70/15 72/2 72/7 73/6 73/15 76/21 76/23 77/1 77/8 77/13 78/1 79/11 80/19 81/16 85/6 88/14 89/13 89/20 91/13 91/21	92/20 92/24 93/8 instead [1] 34/6 instructed [1] 56/8 instruction [3] 28/14 29/11 33/20 instructions [3] 28/9 28/12 29/7 insufficient [1] 6/10 integrity [9] 78/2 79/17 80/4 80/22 81/2 81/6 83/20 86/17 86/21
however [4] 14/20 21/19 23/8 57/1	I have [13] 41/19 64/25 65/25 68/3 68/6 68/25 76/11 76/21 80/3 80/7 80/14 85/19 91/21	I thought [2] 48/11 51/6 I took [1] 42/11 I tried [3] 45/10 45/11 48/4 I turn [1] 85/21 I understand [1] 2/2 I understood [1] 55/1 I used [2] 4/23 46/2 I viewed [1] 58/20 I wanted [1] 44/14 I was [18] 5/21 9/15 9/17 9/23 26/1 26/2 26/6 26/14 34/1 34/17 36/10 49/4 49/6 50/25 53/13 54/8 59/9 79/19 I wasn't [4] 6/2 6/7 34/17 77/17 I will [3] 2/23 76/8 80/16 I would [15] 24/7 27/23 39/7 62/10 62/18 64/13 64/13 68/20 77/16 77/20 81/4 84/4 90/13 92/13 93/1 I wouldn't [5] 31/13 38/1 72/18 89/17 89/22 I'd [8] 6/15 36/24 40/20 48/11 74/20 78/25 92/6 92/11 I'll [3] 65/1 91/21 93/21 I'm [12] 15/17 16/2 26/17 45/13 51/1 51/2 51/20 73/6 85/13 91/9 93/18 93/19 I've [17] 26/16 35/9 45/13 45/23 48/2 48/9 49/10 50/9 50/22 50/22 52/12 52/13 52/14 54/19 59/2 88/25 89/6 Ian [1] 13/3 identified [6] 14/3 17/22 18/13 28/25 40/18 76/11 identify [6] 10/13 18/9 18/11 28/12 29/4 56/21 if [68] 1/15 11/15 12/17 15/14 17/7 18/4 18/7 18/9 18/12 19/10 19/16 20/25 21/2 21/5 21/20 22/5 22/15 23/8 23/16 23/17 23/19 24/3 25/15 30/2 30/10 32/9 36/8 36/24 37/2 37/20 37/21 38/24 39/24 42/1 42/17 43/13 51/2 58/21	IM [1] 63/1 imagine [4] 24/7 64/13 77/16 77/21 immediately [2] 14/22 56/8 impact [4] 13/10 14/22 15/6 15/14 implemented [1] 4/18 imposed [1] 26/19 in' [1] 49/24 inadequate [3] 87/6 87/8 87/11 incident [2] 57/21 57/22 inclined [1] 82/15 include [1] 57/15 includes [1] 7/25 including [3] 12/17 76/4 81/11 incorrect [3] 69/20 78/11 78/14 independent [1] 21/19 indicated [1] 53/24 Indictment [1] 62/7 industry [1] 10/24 inflated [1] 56/22 informant [1] 18/24 information [17] 10/15 10/19 11/2 11/11 11/15 11/20 17/7 26/21 34/23 35/2 35/7 62/8 76/13 80/5 81/5 83/6 84/2 informative [1] 92/5 informed [3] 18/21 56/7 77/9 initial [8] 8/11 8/16 9/9 27/5 31/8 37/14 40/8 40/9 ink [1] 50/18 input [2] 21/12 23/4 Inquiries [1] 62/16 inquiry [37] 1/25 2/12 2/20 2/24 15/24 26/8 28/1 28/2 28/6 28/15 29/19 30/14 30/20 72/21 72/24 73/5 73/9 74/22 75/3 79/2 84/11 84/13 84/19 85/3 85/9 85/16 86/10 87/14 87/16 87/17 87/22 88/1 91/14 92/14	instead [1] 34/6 instructed [1] 56/8 instruction [3] 28/14 29/11 33/20 instructions [3] 28/9 28/12 29/7 insufficient [1] 6/10 integrity [9] 78/2 79/17 80/4 80/22 81/2 81/6 83/20 86/17 86/21 Intelligence [1] 19/1 interact [1] 11/14 interest [1] 18/12 Internal [3] 13/18 14/2 14/5 interrogation [1] 35/13 interview [35] 18/15 19/9 20/2 20/9 20/11 20/16 28/24 41/7 41/12 41/20 41/21 42/6 42/7 42/10 42/18 55/13 55/15 55/17 55/19 57/9 58/11 58/23 63/1 63/21 69/11 71/12 71/19 71/20 85/6 86/16 86/18 89/9 89/10 89/25 90/5 interviewed [1] 28/22 interviewing [1] 8/2 into [20] 13/18 20/17 21/12 23/4 34/20 40/17 54/22 55/2 58/18 59/14 62/14 66/5 78/8 80/5 80/13 80/22 81/2 88/5 89/11 90/21 intranet [1] 25/11 introduced [1] 6/6 investigate [4] 15/12 28/10 29/5 89/4 investigated [2] 22/2 86/4 investigating [2] 3/16 29/13 investigation [49] 3/13 4/7 4/22 5/24 6/13 6/17 6/19 7/4 8/1 9/4 9/14 10/2 10/4 12/4 15/25 16/10 18/12 18/22 19/4 21/9 21/12 21/18 21/19 21/22 22/8 22/13 24/3 24/14 27/6 31/9 32/3 36/23 37/7 37/14 37/15 40/8 40/9 40/21 54/7 59/14 60/15 62/2 62/19 73/4 87/1 87/6 88/1 88/3 88/4 investigations [4] 8/15 9/8 15/16 24/23
I	I also [1] 10/11 I am [5] 33/2 42/1 56/20 60/18 89/6 I appear [1] 85/25 I believe [15] 9/16 12/2 12/4 25/10 27/13 37/8 39/18 40/7 41/6 43/9 58/15 72/7 76/21 77/7 89/15 I believed [2] 57/20 82/20 I can [3] 1/5 16/19 28/19 I can't [5] 45/1 45/2 48/5 48/6 50/10 I cannot [2] 17/10 30/10 I could [4] 43/13 48/19 54/23 87/16 I couldn't [2] 46/18 50/15 I did [6] 3/14 7/7 11/5 29/5 34/24 55/21 I didn't [5] 34/25 35/10 44/11 57/19 91/4 I do [10] 1/19 17/13 23/3 35/22 41/17 41/24 59/2 64/10 90/3 93/5 I don't [50] 6/11 8/12 8/17 9/11 9/12 9/15 16/7 22/3 22/9 22/24 23/24 24/12 28/18 29/12 31/12 31/20 59/1 59/9 64/13 67/15 67/17 67/25 70/8 73/18 73/23 74/7 74/16 74/19 76/17 77/25 78/17 78/19 79/14 81/3 81/8 81/23 82/2 83/6 83/13 83/25 84/23 87/10 87/19 88/21 89/15 90/9 90/13 91/17 91/23 92/9 I don't know [1] 83/10 I examined [1] 13/12 I explained [1] 54/18 I feel [1] 46/22 I give [1] 93/14 I had [10] 5/21 9/18	I hope [2] 92/4 93/16 I joined [1] 12/1 I just [8] 44/13 45/16 45/17 45/25 48/10 48/23 49/24 49/25 I kept [4] 46/16 49/7 50/20 51/4 I knew [2] 26/14 26/20 I know [8] 32/20 36/25 48/17 48/24 48/24 51/22 51/23 93/18 I left [1] 12/8 I made [1] 87/16 I mean [8] 33/15 39/1 45/13 46/19 48/17 49/25 50/1 52/11 I might [1] 9/23 I needed [1] 34/19 I never [2] 6/20 44/2 I obtained [1] 59/1 I obviously [2] 28/23 77/18 I please [1] 80/2 I presented [1] 91/5 I produce [1] 66/2 I put [2] 46/20 46/23 I rang [3] 48/7 50/2 50/6 I read [1] 68/16 I received [1] 93/13 I remember [1] 88/20 I requested [1] 34/18 I said [8] 48/4 49/1 49/10 50/8 51/20 51/22 52/11 53/6 I sent [1] 27/3 I should [1] 64/14 I should've [1] 53/14 I still [1] 52/11 I suppose [6] 11/18 15/9 37/4 53/10 73/8 73/9 I take [1] 65/12 I think [33] 5/4 8/8 9/23 11/19 12/3 20/5 23/18 24/3 27/18 27/23 28/20 29/5 29/23 31/24 34/5 34/11 34/11 38/1 38/23 42/8 43/4 45/11 46/12 49/17 52/22 55/1 72/5 78/4 78/5	intranet [1] 25/11 introduced [1] 6/6 investigate [4] 15/12 28/10 29/5 89/4 investigated [2] 22/2 86/4 investigating [2] 3/16 29/13 investigation [49] 3/13 4/7 4/22 5/24 6/13 6/17 6/19 7/4 8/1 9/4 9/14 10/2 10/4 12/4 15/25 16/10 18/12 18/22 19/4 21/9 21/12 21/18 21/19 21/22 22/8 22/13 24/3 24/14 27/6 31/9 32/3 36/23 37/7 37/14 37/15 40/8 40/9 40/21 54/7 59/14 60/15 62/2 62/19 73/4 87/1 87/6 88/1 88/3 88/4 investigations [4] 8/15 9/8 15/16 24/23	

<p>I</p> <p>investigative [1] 4/3</p> <p>Investigator [22] 6/22 10/1 17/1 18/7 18/8 18/20 21/11 25/8 25/14 26/9 26/13 28/5 28/13 29/14 29/18 31/17 37/15 38/16 84/10 87/13 90/15 91/1</p> <p>Investigators [7] 7/9 7/17 12/7 12/12 15/8 19/7 82/4</p> <p>involved [5] 3/15 30/15 40/24 77/17 82/24</p> <p>involvement [7] 40/20 40/22 61/14 64/2 77/11 77/20 78/22</p> <p>is [138]</p> <p>isn't [2] 48/24 86/23</p> <p>issue [18] 41/25 42/8 54/14 57/20 71/8 71/18 71/24 72/8 75/2 75/5 76/16 76/18 77/3 77/9 81/24 82/3 82/10 83/14</p> <p>issues [26] 6/12 10/21 11/4 40/17 40/17 41/17 41/23 42/4 42/6 53/24 54/8 54/11 54/13 57/8 57/22 58/2 62/17 67/19 69/3 71/15 72/13 81/18 83/8 86/17 86/19 91/15</p> <p>it [230]</p> <p>it' [1] 48/6</p> <p>it's [23] 23/15 28/4 34/9 35/24 43/17 44/5 45/17 45/18 46/22 48/17 48/18 48/19 48/25 51/3 51/22 51/23 52/2 52/2 53/12 58/14 79/3 80/18 89/22</p> <p>item [4] 34/7 65/18 66/2 66/20</p> <p>its [7] 2/21 3/17 13/6 13/8 13/10 14/17 20/7</p> <p>itself [2] 27/9 58/15</p>	<p>January 2011 [1] 83/21</p> <p>Jarnail [1] 60/11</p> <p>Jason [2] 16/21 75/19</p> <p>Jerry [3] 32/15 77/14 77/16</p> <p>job [2] 14/17 39/14</p> <p>jobs [3] 14/4 14/15 14/21</p> <p>John [3] 10/8 12/5 62/6</p> <p>John Scott [1] 12/5</p> <p>joined [3] 2/25 3/12 12/1</p> <p>joint [1] 7/10</p> <p>Jon [7] 75/7 75/16 75/16 76/8 77/10 78/23 79/5</p> <p>Jon Longman [3] 75/7 78/23 79/5</p> <p>Julie [2] 68/14 68/18</p> <p>Juliet [2] 32/14 32/15</p> <p>July [7] 3/9 4/21 12/2 61/24 75/8 75/15 75/19</p> <p>July 2000 [1] 12/2</p> <p>June [1] 65/5</p> <p>jury [9] 73/13 73/14 73/25 74/2 74/6 88/7 88/13 88/17 90/23</p> <p>just [43] 9/17 15/20 24/6 29/9 32/24 34/12 35/9 38/22 39/13 43/13 43/19 44/13 44/17 45/16 45/17 45/25 48/3 48/10 48/23 49/23 49/24 49/25 50/7 52/14 53/9 54/16 55/20 59/4 59/25 65/1 65/4 65/13 70/13 70/15 76/23 76/23 77/1 78/6 78/7 78/18 78/25 80/15 80/19</p> <p>justified [2] 84/17 85/15</p> <p>justify [1] 85/8</p>	<p>48/24 48/24 49/8 49/21 49/23 50/21 51/5 51/22 51/23 70/8 76/9 79/8 79/14 83/6 83/10 83/25 93/18</p> <p>knowing [2] 38/19 57/16</p> <p>knowledge [4] 2/16 9/18 11/3 11/9</p> <p>known [3] 12/3 37/6 56/19</p> <hr/> <p>L</p> <p>label [1] 81/19</p> <p>lady [1] 48/4</p> <p>laid [1] 34/4</p> <p>large [1] 11/13</p> <p>larger [1] 48/17</p> <p>last [5] 37/25 38/1 55/22 56/18 92/18</p> <p>later [3] 27/7 33/23 58/8</p> <p>law [16] 6/19 16/5 24/10 27/5 31/9 31/18 31/22 32/5 55/18 57/17 58/12 58/25 59/6 60/12 62/1 74/9</p> <p>lawyer [2] 20/24 60/12</p> <p>layout [1] 34/4</p> <p>Lead [1] 13/12</p> <p>leader [4] 12/7 18/5 18/5 24/8</p> <p>leaders [1] 12/11</p> <p>least [2] 23/19 81/1</p> <p>led [3] 83/7 83/9 84/7</p> <p>left [4] 4/3 12/8 39/11 86/4</p> <p>legal [15] 8/23 16/4 17/1 20/22 21/2 21/6 26/24 27/2 27/4 27/9 55/5 57/12 76/3 88/16 91/6</p> <p>legislation [3] 25/13 25/15 25/16</p> <p>less [3] 15/9 39/13 74/4</p> <p>Lester [1] 41/10</p> <p>liability [1] 66/23</p> <p>liaison [3] 13/24 17/12 17/17</p> <p>life [1] 90/25</p> <p>light [1] 2/11</p> <p>like [22] 33/17 40/20 45/17 48/7 48/18 48/18 48/25 51/5 51/6 51/21 52/17 53/4 53/6 53/12 53/13 72/7 74/20 78/25 92/6 92/11 92/13 93/1</p> <p>likely [1] 76/1</p> <p>Likewise [1] 68/5</p> <p>limited [9] 6/25 10/6 36/8 36/10 38/4 61/12</p>	<p>67/4 67/9 78/22</p> <p>line [18] 3/8 28/15 30/20 69/12 69/13 70/13 70/13 72/20 72/24 79/23 81/13 83/23 84/13 84/19 85/3 85/8 86/10 87/22</p> <p>lines [18] 12/19 15/24 20/19 26/8 28/1 28/2 28/6 29/19 73/5 73/9 78/9 84/10 85/16 87/13 87/15 87/17 88/1 91/14</p> <p>LISA [5] 1/8 1/12 61/13 76/8 95/2</p> <p>list [4] 7/23 7/25 12/17 81/11</p> <p>listed [3] 8/6 25/11 43/15</p> <p>lists [2] 61/6 80/21</p> <p>little [6] 12/18 30/2 44/16 55/11 62/3 77/2</p> <p>LJA [3] 65/19 66/2 66/20</p> <p>LJA/10 [1] 65/19</p> <p>LJA/11 [1] 66/2</p> <p>LJA/12 [1] 66/20</p> <p>loads [1] 48/1</p> <p>locate [1] 64/22</p> <p>log [16] 65/25 66/4 66/7 66/8 66/16 66/25 67/12 67/16 68/21 69/7 69/8 70/5 71/12 71/15 72/15 78/8</p> <p>Logistics [1] 14/24</p> <p>logs [10] 40/2 42/1 58/4 59/1 67/15 68/13 68/17 71/17 72/2 85/18</p> <p>London [3] 5/5 16/19 16/25</p> <p>long [4] 12/16 44/24 45/2 47/17</p> <p>longer [1] 67/24</p> <p>Longman [6] 75/7 75/16 75/17 77/10 78/23 79/5</p> <p>look [8] 32/22 34/7 42/17 64/25 65/13 69/5 75/25 76/22</p> <p>look-up [1] 34/7</p> <p>looked [3] 54/16 55/20 72/3</p> <p>looking [6] 10/1 19/18 38/5 42/5 81/3 82/14</p> <p>looks [1] 33/17</p> <p>loss [11] 14/20 19/7 21/21 22/7 29/16 41/23 46/19 56/15 58/20 82/14 88/3</p> <p>losses [3] 42/11 47/7 52/17</p> <p>lot [1] 36/25</p>	<p>lots [1] 49/22</p> <p>Ltd [1] 13/4</p> <hr/> <p>M</p> <p>machine [2] 58/18 88/6</p> <p>made [36] 1/22 6/12 7/16 17/18 18/23 18/23 19/7 21/24 22/25 28/23 32/19 36/18 37/18 40/12 41/7 42/2 50/16 51/14 55/24 58/5 60/25 62/20 62/24 64/4 64/7 64/19 67/18 68/9 68/23 69/3 71/22 72/16 80/25 81/22 87/16 87/16</p> <p>Mail [12] 4/6 6/22 7/8 7/14 7/16 7/18 8/3 9/10 13/5 25/5 25/7 25/20</p> <p>majority [1] 25/19</p> <p>make [15] 2/6 2/10 13/4 13/9 14/21 28/5 38/7 48/5 53/15 61/19 82/12 82/14 89/18 89/23 91/4</p> <p>maker [1] 70/4</p> <p>makes [1] 58/21</p> <p>making [7] 2/13 23/5 39/15 57/13 73/8 74/22 92/7</p> <p>managed [2] 10/21 16/25</p> <p>manager [25] 3/5 3/13 4/22 5/24 6/13 6/17 7/5 9/14 10/4 11/17 13/19 13/20 16/23 18/21 21/9 21/20 22/5 22/15 23/3 23/8 23/18 23/21 24/4 39/17 62/19</p> <p>Managers [1] 3/9</p> <p>Manchester [1] 16/23</p> <p>manipulated [1] 29/4</p> <p>manual [3] 5/10 63/11 65/19</p> <p>manually [3] 4/14 5/9 5/14</p> <p>many [2] 39/11 57/3</p> <p>March [3] 8/22 9/5 60/14</p> <p>March 2002 [1] 8/22</p> <p>Mark [2] 75/20 75/24</p> <p>marked [1] 2/1</p> <p>Marketing [1] 14/25</p> <p>Marsh [3] 10/5 10/11 12/15</p> <p>matching [1] 81/19</p> <p>material [7] 21/25 22/21 26/4 29/21 32/2 32/4 64/3</p>
--	--	--	---	--

M	Misra [5] 77/14 77/18 78/22 79/7 79/16	55/5 55/23 56/8 56/21 57/8 58/3 58/11 58/23 59/10 59/16 61/8 61/11 64/1 64/4 64/12 67/3 67/6 67/20 68/4 69/8 70/11 71/11 71/18 72/10 73/11 73/12 73/15 73/19 73/24 74/4 74/18 88/14 88/23 89/2 89/9 90/6 90/10 90/19 91/9 91/15 92/4	my [17] 11/9 26/2 26/22 27/3 29/6 29/7 42/16 51/23 53/15 60/22 69/9 80/21 86/4 87/5 88/9 88/18 89/22	non-Internal [1] 14/2 nor [1] 73/20 normally [1] 15/22 not [90] 1/25 9/23 11/5 11/9 14/22 15/17 16/2 17/13 18/10 21/21 21/23 22/7 22/8 22/11 22/14 22/17 23/3 23/10 23/11 23/12 23/13 23/19 26/16 26/17 31/4 31/12 31/14 31/17 33/2 38/7 38/20 38/25 40/9 41/17 41/24 42/3 42/14 44/6 47/2 48/12 50/18 50/23 51/2 51/23 51/23 52/2 54/8 56/10 56/15 56/19 56/23 57/10 58/2 61/11 61/19 61/22 63/2 64/17 67/8 67/14 67/23 70/5 70/6 71/7 73/4 73/6 73/24 74/6 81/19 82/4 82/23 83/2 84/17 84/18 85/8 85/15 88/2 88/10 89/2 89/6 89/18 89/22 90/6 90/11 90/16 90/16 91/11 92/16 93/3 93/19 note [1] 44/10 notebook [1] 8/5 noted [3] 44/18 49/9 60/17 notes [1] 43/16 notice [6] 47/3 51/6 56/13 56/25 67/7 67/9 notices [26] 43/25 44/20 45/8 45/19 47/16 48/2 51/13 51/16 52/8 56/1 56/3 56/9 56/11 56/20 57/1 58/19 62/25 66/17 66/21 66/23 67/5 67/13 68/5 68/7 68/10 88/5 notwithstanding [1] 90/21 November [2] 47/22 47/22 now [13] 42/3 46/1 56/2 58/13 64/7 65/6 65/25 70/22 72/19 78/20 82/8 86/7 87/7 NPA [1] 27/12 number [16] 13/13 25/2 30/15 32/18 32/20 34/7 34/7 34/8 36/8 54/15 56/2 77/4 79/22 80/25 81/6 83/19 number 1 [1] 34/8 numbers [2] 34/20 81/19
matter [9] 30/6 30/11 31/3 31/5 39/24 40/5 61/6 61/15 86/25	Misra's [2] 78/24 80/23	Mrs Palmer [44] 41/5 41/21 42/4 42/21 43/5 43/10 43/23 44/7 44/17 45/7 47/5 49/14 51/17 53/2 53/19 54/5 55/23 56/8 56/21 57/8 58/3 58/11 58/23 59/10 67/3 67/6 67/20 68/4 70/11 71/11 71/18 72/10 73/12 73/15 73/19 73/24 74/4 88/14 90/6 90/10 90/19 91/9 91/15 92/4	myself [3] 9/16 54/20 75/24	needed [3] 34/19 44/1 61/5 needs [2] 63/14 63/23 neither [1] 73/19 Network [1] 3/2 never [8] 6/20 44/2 46/20 48/9 48/23 49/10 83/17 83/18 new [1] 7/10 news [1] 90/6 next [3] 20/20 39/12 42/13 Nick [4] 46/1 49/17 49/18 63/19 no [73] 2/9 2/14 5/17 6/2 6/7 6/11 6/16 6/20 8/12 8/17 8/20 10/3 11/5 11/14 14/15 21/14 22/3 23/24 24/6 24/6 24/13 29/12 35/6 35/18 44/3 45/24 46/15 46/16 47/4 49/3 50/9 52/9 57/6 58/4 59/17 61/2 61/22 63/7 64/17 68/4 68/8 69/1 71/1 73/18 73/23 74/7 74/19 77/19 78/19 81/8 82/2 83/2 83/7 84/4 84/22 85/1 85/2 85/22 85/22 86/20 86/21 87/5 87/10 88/8 89/7 89/15 90/9 90/14 90/18 90/20 91/8 91/8 92/22 nobody [5] 45/25 46/4 46/17 56/6 84/14 non [3] 7/23 14/2 58/17 non-accounting [1] 58/17
matters [3] 62/11 63/9 63/20	Miss [1] 60/20	Mrs Palmer [1] 60/20		
Matthews [1] 7/14	mistake [1] 54/24	mistakes [3] 51/14 54/23 57/24		
may [11] 1/6 15/10 17/6 20/7 20/10 26/4 27/22 28/20 31/25 38/25 72/8	mistress [1] 87/20	Mo [1] 53/6		
maybe [11] 9/21 15/10 31/12 31/15 37/21 42/14 47/23 49/17 72/8 78/5 85/17	Moderator [9] 43/1 43/2 43/3 43/3 46/6 51/12 52/5 53/16 53/17	Moderator 1 [3] 43/2 43/3 53/16		
McFarlane [2] 32/14 32/15	Moderator 2 [4] 43/3 51/12 52/5 53/17	moment [1] 59/19		
me [22] 39/14 42/16 43/4 43/24 43/25 44/11 44/15 45/10 45/24 46/14 46/19 46/21 48/1 48/3 48/18 50/16 51/7 51/21 53/12 53/14 93/13 93/15	Monday [2] 50/4 50/4	Monday [2] 50/4 50/4		
mean [15] 9/11 27/14 28/16 33/15 39/1 39/3 39/4 42/12 45/13 46/19 48/17 48/23 49/25 50/1 52/11	money [10] 50/22 51/23 53/7 53/8 58/17 70/25 88/5 89/13 89/20 90/3	money [10] 50/22 51/23 53/7 53/8 58/17 70/25 88/5 89/13 89/20 90/3		
meeting [1] 89/12	month [7] 37/3 39/12 39/13 53/25 67/22 69/10 69/11	month [7] 37/3 39/12 39/13 53/25 67/22 69/10 69/11		
member [4] 20/4 24/15 35/17 92/21	months [10] 45/4 45/5 45/6 47/19 47/21 52/7 53/23 56/2 57/3 90/4	months [10] 45/4 45/5 45/6 47/19 47/21 52/7 53/23 56/2 57/3 90/4		
members [2] 7/13 92/14	more [14] 9/17 15/21 30/20 35/2 35/7 46/4 60/22 65/13 68/23 75/3 82/15 87/15 91/21 92/23	more [14] 9/17 15/21 30/20 35/2 35/7 46/4 60/22 65/13 68/23 75/3 82/15 87/15 91/21 92/23		
memo [2] 61/24 62/14	morning [6] 1/3 59/19 73/13 86/6 86/7 92/8	morning [6] 1/3 59/19 73/13 86/6 86/7 92/8		
memory [1] 65/4	morning's [1] 92/5	morning's [1] 92/5		
mention [2] 64/2 86/25	most [2] 38/2 93/17	most [2] 38/2 93/17		
mentioned [1] 91/15	mounting [1] 83/19	mounting [1] 83/19		
merits [1] 20/7	move [1] 38/5	move [1] 38/5		
mess' [1] 50/24	moving [1] 9/9	moving [1] 9/9		
message [2] 83/3 85/13	Mr [14] 46/6 47/13 47/20 52/5 60/15 61/4 61/19 62/6 81/14 85/23 85/24 90/1 91/20 95/6	Mr [14] 46/6 47/13 47/20 52/5 60/15 61/4 61/19 62/6 81/14 85/23 85/24 90/1 91/20 95/6		
met [2] 15/20 36/18	Mr Chine [5] 46/6 47/13 47/20 52/5 90/1	Mr Chine [5] 46/6 47/13 47/20 52/5 90/1		
Michael [1] 7/14	Mr Jacobs [4] 85/23 85/24 91/20 95/6	Mr Jacobs [4] 85/23 85/24 91/20 95/6		
Mick [2] 49/15 49/16	Mr Singh [3] 60/15 61/4 61/19	Mr Singh [3] 60/15 61/4 61/19		
might [14] 9/23 20/8 20/18 28/16 30/22 33/12 50/24 72/1 78/15 82/14 86/11 89/3 89/24 91/12	Mr Stephen [1] 62/6	Mr Stephen [1] 62/6		
might've [1] 47/25	Mr Ward [1] 81/14	Mr Ward [1] 81/14		
million [1] 44/3	Mrs [58] 40/25 41/5 41/21 42/4 42/21 43/5 43/10 43/23 44/7 44/17 45/7 47/5 49/14 51/17 53/2 53/19 54/5	Mrs [58] 40/25 41/5 41/21 42/4 42/21 43/5 43/10 43/23 44/7 44/17 45/7 47/5 49/14 51/17 53/2 53/19 54/5		
Mills [1] 13/3				
mind [1] 40/14				
mindful [1] 67/21				
mine [3] 48/24 51/23 91/11				
minus [1] 69/25				
minutes [4] 59/24 59/25 74/3 88/18				

N	offline [1] 41/24 often [1] 54/19 Oh [3] 5/1 45/17 90/5 Okay [4] 43/11 65/3 65/8 65/15	other [13] 2/12 9/21 9/22 9/22 17/3 17/12 20/17 33/25 38/15 41/23 53/13 61/17 67/18 others [2] 79/22 80/25 otherwise [2] 84/18 85/15 our [3] 14/23 25/3 76/3 out [26] 5/11 5/16 5/20 6/1 7/23 34/4 44/15 44/21 48/5 48/6 48/8 48/11 48/19 50/3 51/25 53/9 53/15 54/17 55/11 65/18 67/6 69/17 69/21 70/10 70/22 73/13 out' [1] 51/22 outcome [1] 74/18 outlining [1] 61/14 outset [2] 72/4 72/22 over [20] 12/10 12/22 14/13 23/1 26/12 30/25 42/12 48/2 49/8 52/20 53/14 53/22 55/13 55/22 56/17 65/24 66/14 75/18 85/9 92/18 overtakes [1] 53/13 owed [1] 67/8 Owen [6] 17/11 75/16 75/19 79/22 80/17 80/23 Owen's [1] 79/24 Owens [1] 16/23 own [5] 14/17 15/23 20/7 33/15 54/22	page 26 [1] 41/15 page 32 [1] 82/18 page 33 [1] 1/15 page 34 [1] 47/12 page 5 [1] 25/23 page 6 [1] 55/6 page 7 [1] 42/24 pages [3] 23/1 52/14 52/14 paid [3] 67/8 89/13 89/20 Palmer [53] 40/22 41/5 41/21 42/4 42/21 43/5 43/10 43/18 43/23 44/7 44/17 45/7 47/4 47/5 49/14 49/20 51/11 51/17 51/18 53/2 53/19 54/5 55/23 56/8 56/21 57/8 58/3 58/11 58/23 59/10 60/20 67/3 67/6 67/20 68/4 70/11 71/11 71/18 72/10 73/12 73/15 73/19 73/24 74/4 86/3 86/17 88/14 90/6 90/10 90/19 91/9 91/15 92/4 Palmer's [14] 40/25 55/5 59/16 61/8 61/11 64/1 64/4 64/12 69/8 73/11 74/18 88/23 89/2 89/9 paper [3] 43/14 45/10 48/3 papers [7] 17/1 17/15 20/22 21/3 30/13 62/18 65/6 paragraph [40] 4/10 7/3 7/24 8/21 9/3 10/13 10/20 11/23 11/25 14/13 16/9 16/13 16/17 17/23 17/25 18/17 20/21 21/15 22/4 23/1 24/19 24/21 25/1 25/13 25/22 27/25 28/2 30/4 30/25 36/14 40/23 41/14 55/16 55/22 56/18 58/1 62/16 68/1 74/25 82/17 paragraph 108 [1] 82/17 paragraph 11 [1] 7/3 paragraph 13 [1] 7/24 paragraph 14 [1] 8/21 paragraph 15 [1] 9/3 paragraph 22 [2] 25/22 27/25 paragraph 27 [1] 10/13 paragraph 28 [2] 11/23 11/25	paragraph 29 [1] 16/9 paragraph 3 [1] 62/16 paragraph 30 [2] 16/13 16/17 paragraph 34 [3] 24/19 24/21 25/13 paragraph 35 [1] 25/1 paragraph 4 [1] 4/10 paragraph 40 [1] 17/23 paragraph 42 [1] 21/15 paragraph 44 [1] 18/17 paragraph 45 [1] 20/21 paragraph 46 [1] 23/1 paragraph 55 [1] 28/2 paragraph 74 [1] 30/4 paragraph 75 [1] 30/25 paragraph 76 [1] 74/25 paragraph 78 [1] 36/14 paragraph 84 [1] 40/23 paragraph 90 [2] 41/14 58/1 paragraphs [1] 62/11 paragraphs 3 [1] 62/11 paralegals [1] 92/15 part [9] 13/7 31/8 33/24 36/23 42/10 50/5 50/6 68/23 93/8 Participants [4] 85/21 93/2 93/6 93/11 particular [4] 36/11 37/22 44/5 53/25 particularly [1] 54/12 party [2] 29/21 83/23 Pause [1] 65/11 pausing [1] 44/17 pay [4] 56/10 66/24 67/3 92/13 payment [1] 10/24 pencil [1] 43/17 Penny [3] 75/23 77/3 78/5 Penny Thomas [1] 78/5 people [4] 7/12 7/15 22/24 50/20 per [1] 26/17 performed [3] 19/2 35/15 35/16 performing [1] 9/19
O	obligation [1] 29/19 obtain [2] 61/1 61/20 obtained [23] 31/1 31/4 31/8 31/15 31/16 36/6 37/25 40/2 59/1 59/2 59/3 61/2 63/18 63/19 63/23 65/25 66/8 68/14 68/18 72/3 73/6 82/5 85/3 obtaining [6] 18/25 33/3 33/9 36/4 66/16 85/10 obviously [25] 9/18 9/21 15/12 22/17 26/20 28/23 29/3 33/15 34/25 37/23 38/3 40/10 45/12 46/20 49/24 54/25 57/11 58/13 58/19 67/16 71/24 73/7 77/18 83/15 84/1 occasional [1] 93/3 occasions [1] 38/23 occur [1] 59/6 October [4] 1/15 12/16 47/22 79/5 odd [2] 49/8 58/16 off [6] 5/13 9/22 50/10 57/21 57/22 80/8 off-reports [1] 50/10 offence [3] 18/10 19/10 20/2 offences [4] 3/16 8/4 17/8 60/21 office [59] 2/25 3/1 4/4 4/12 6/3 6/8 6/24 6/25 7/8 7/17 10/6 10/22 11/12 11/13 13/4 14/7 17/5 17/13 18/8 19/5 19/11 25/5 26/10 28/13 29/16 34/19 38/17 39/5 40/11 45/2 45/13 46/15 49/4 50/15 52/13 52/17 56/5 56/6 61/9 61/12 67/3 67/7 67/9 68/7 69/20 69/24 70/23 71/1 73/20 74/11 74/15 78/16 83/4 86/2 89/1 89/12 89/14 89/20 90/22 Officer [8] 3/1 26/1 26/2 26/3 26/11 26/15 41/11 78/23 Officers [1] 61/17 offices [3] 5/5 5/21 76/12	omitted [1] 86/25 on [146] once [6] 17/11 18/17 18/19 37/18 60/24 70/3 one [34] 3/19 4/3 7/15 9/17 9/20 9/24 12/7 14/18 15/2 15/2 27/7 32/20 33/23 37/2 40/11 42/8 42/12 51/10 53/12 54/14 57/21 57/22 65/4 66/9 67/16 67/17 71/1 73/11 75/5 76/19 78/25 79/12 80/23 86/3 one-off [1] 57/21 ones [1] 76/12 ongoing [1] 26/22 online [3] 46/16 49/3 50/9 only [7] 34/11 37/25 38/8 39/11 45/12 67/11 67/16 onto [1] 5/12 open [3] 11/13 14/18 49/4 open-planned [1] 11/13 operation [1] 59/15 operations [9] 10/17 11/7 11/22 12/5 15/8 15/16 16/11 63/11 65/19 opinion [2] 60/18 60/22 opposed [3] 5/13 7/16 27/20 options [1] 13/13 or [56] 6/3 6/8 6/19 9/22 15/24 17/7 18/10 19/8 19/16 20/3 20/9 20/18 22/22 24/15 25/5 25/6 25/9 25/24 26/5 26/16 28/7 28/9 28/12 28/14 29/5 29/11 32/8 33/20 34/6 35/4 35/14 35/16 37/21 37/21 38/15 39/4 39/13 42/11 42/21 44/6 45/4 51/3 54/17 57/25 59/6 61/20 68/10 77/11 78/7 78/8 80/15 81/25 83/11 83/22 85/10 87/20 order [1] 56/9 organised [1] 29/1 originally [1] 16/19	page 1 [1] 60/13 page 10 [2] 11/24 16/15 page 11 [1] 24/20 page 12 [1] 17/25 page 13 [1] 21/16 page 14 [1] 18/18 page 17 [1] 28/4 page 21 [1] 29/24	P
	PACE [2] 24/22 25/18 page [36] 1/15 11/24 12/22 12/23 14/10 14/13 16/15 17/25 18/18 20/20 21/16 24/20 25/23 28/4 29/24 30/25 32/13 41/15 42/24 42/25 47/12 51/15 51/18 55/6 55/10 55/13 55/22 56/17 60/11 60/13 63/21 65/24 66/14 75/13 75/18 82/18 page 1 [1] 60/13 page 10 [2] 11/24 16/15 page 11 [1] 24/20 page 12 [1] 17/25 page 13 [1] 21/16 page 14 [1] 18/18 page 17 [1] 28/4 page 21 [1] 29/24	paragraph 108 [1] 82/17 paragraph 11 [1] 7/3 paragraph 13 [1] 7/24 paragraph 14 [1] 8/21 paragraph 15 [1] 9/3 paragraph 22 [2] 25/22 27/25 paragraph 27 [1] 10/13 paragraph 28 [2] 11/23 11/25		

P	29/20 44/6	precise [1] 39/1	properly [2] 26/16 42/15	Q
period [12] 6/14 6/15 10/9 36/11 37/22 52/14 53/23 66/8 67/12 67/14 67/24 93/16	points [4] 13/16 14/8 15/10 28/7	preparing [1] 57/5	propose [1] 92/10	quality [2] 15/15 15/18
permitted [1] 61/12	POL00052990 [1] 60/10	present [3] 42/22 56/19 64/11	prosecute [11] 22/10 22/17 22/18 23/16 37/18 89/14 89/21 90/7 91/6 91/10 91/12	querying [1] 68/5
person [4] 19/8 39/5 39/7 39/15	POL00053003 [1] 61/23	presented [6] 34/12 76/10 76/13 77/23 88/24 91/5	prosecuted [4] 21/13 22/23 22/25 74/12	question [20] 23/6 28/8 29/7 29/10 29/25 30/5 31/21 45/21 45/24 48/13 59/13 73/12 73/21 77/22 80/5 80/22 81/2 82/12 88/14 88/17
personal [1] 58/18	POL00053007 [1] 55/4	pressure [1] 89/1	prosecuting [1] 73/19	questioned [5] 1/9 83/22 85/24 95/4 95/6
personnel [1] 13/3	POL00053008 [1] 62/15	prevent [1] 15/23	prosecution [24] 20/24 21/3 21/4 21/5 21/7 23/5 23/10 23/12 23/20 23/22 24/1 24/11 26/5 26/25 31/11 31/19 31/24 32/10 40/21 57/13 57/18 62/5 91/5 91/7	questions [8] 2/23 38/24 85/19 85/20 85/23 91/22 92/2 92/8
persons [1] 18/11	POL00053009 [1] 41/19	previous [2] 51/14 54/2	prosecutions [3] 8/10 77/5 78/16	quite [8] 15/13 32/3 32/21 37/13 48/12 54/18 58/14 74/2
petition [1] 88/22	POL00069058 [1] 42/20	PRICE [5] 1/9 86/16 88/13 93/22 95/4	prospect [2] 21/1 60/20	quotas [1] 39/11
Phil [1] 10/12	POL00141170 [2] 32/12 35/24	Price's [1] 38/23	Protection [1] 24/25	R
phone [1] 19/8	POL00166566 [1] 12/14	primarily [1] 14/23	prove [1] 82/14	raise [2] 42/6 68/6
phoned [1] 44/2	POL00167369 [1] 81/10	principle [1] 23/25	provide [7] 11/6 14/23 27/1 27/8 33/4 36/11 80/3	raised [19] 18/3 18/4 18/17 18/19 24/3 42/4 42/8 57/8 62/11 63/20 67/19 67/22 69/11 71/18 83/20 85/6 86/17 86/19 91/15
phoning [1] 90/5	POL00169416 [1] 75/6	print [1] 5/11	provided [26] 1/25 2/3 2/12 19/16 24/10 25/18 27/15 30/14 31/2 31/4 31/9 31/18 31/21 31/23 32/21 33/1 36/1 55/18 57/12 65/7 74/1 75/3 78/15 79/1 82/22 87/3	raising [2] 17/5 59/13
physical [3] 3/21 3/23 10/15	POL00169419 [1] 79/4	printed [3] 19/13 19/16 19/19	provision [1] 13/23	rang [3] 48/7 50/2 50/6
pick [2] 33/2 36/2	POL00169422 [1] 79/21	printer [6] 50/14 50/17 70/17 71/4 71/7 71/9	public [2] 92/20 92/25	rather [2] 22/11 82/5
picking [3] 33/7 35/25 36/10	POL00169423 [1] 80/18	printing [1] 9/22	publicly [2] 92/12 93/20	reading [1] 78/4
pink [1] 80/14	Police [2] 8/3 8/13	printouts [1] 35/4	purely [1] 4/2	reads [4] 33/19 62/3 75/21 79/25
place [5] 10/22 17/9 18/11 41/8 42/19	policies [2] 25/2 25/12	prior [3] 6/18 52/7 72/6	purpose [3] 33/11 43/13 66/16	realistic [2] 21/1 60/19
placed [2] 36/17 88/5	pop [1] 80/15	private [1] 88/5	purposes [7] 2/18 41/11 57/5 64/8 68/14 74/22 77/19	really [3] 11/13 20/7 23/15
planned [1] 11/13	Porters [3] 76/7 77/12 77/14	probably [11] 9/16 9/19 15/21 16/7 26/23 32/7 36/24 83/2 87/15 89/14 89/21	reached [1] 37/12	reams [1] 45/10
play [1] 91/2	portion [1] 63/14	problem [4] 36/7 39/23 56/6 84/20	read [9] 57/4 64/23 68/13 68/16 68/17 68/21 73/13 76/19 88/25	reason [1] 84/22
played [1] 92/22	position [3] 23/25 90/22 91/10	problems [17] 30/8 30/17 39/25 40/13 53/20 54/5 57/7 59/12 70/10 71/4 71/11 71/21 72/12 76/1 82/25 85/7 86/9	reading [1] 78/4	reasonable [18] 26/7 28/1 28/6 30/20 59/20 72/20 72/24 73/9 84/10 84/13 84/18 85/16 86/10 87/13 87/15 87/17 87/22 87/25
please [70] 1/6 1/10 1/16 11/24 12/13 12/18 12/22 14/13 16/15 17/24 20/20 21/15 23/1 24/19 25/22 28/4 29/24 30/3 30/12 30/25 32/11 32/13 32/24 35/23 38/6 40/20 41/14 42/17 42/24 47/12 55/3 55/6 55/10 55/11 55/14 55/22 56/17 56/18 59/25 60/1 60/3 60/9 60/11 60/13 60/25 61/23 61/25 62/2 62/13 62/15 63/10 64/18 65/24 66/12 66/15 69/6 69/10 70/15 74/20 75/6 75/18 75/23 77/1 79/3 79/20 80/2 80/18 81/9 81/18 82/17	posnet [1] 16/20	procedure [3] 8/15 24/22 65/17	reasons [1] 93/9	
PLU [1] 34/7	possibly [8] 15/22 20/17 24/7 37/13 40/9 82/16 83/25 89/17	proceed [6] 20/2 23/11 23/13 24/11 60/25 61/6	reassess [1] 23/25	
pm [3] 70/25 71/6 94/1	post [47] 2/25 4/3 4/12 5/5 5/21 6/3 6/8 6/24 6/25 7/8 7/16 10/6 10/22 13/4 13/19 13/25 14/7 17/5 17/13 25/5 26/10 28/13 29/16 38/16 39/5 40/11 45/2 45/13 49/4 52/12 56/5 61/12 67/3 67/6 67/8 68/7 73/20 74/10 74/15 78/16 83/4 86/2 89/1 89/11 89/13 89/20 90/22	proceeded [3] 21/5 23/20 64/1	reassurance [1] 84/16	
point [21] 3/12 3/19 10/1 11/18 14/3 17/12 17/17 26/24 27/20 31/10 31/18 31/24 32/24 35/25 38/6 40/19 48/12 54/14 67/22 73/11 77/20	posting [1] 81/19	proceeds [1] 24/24	recall [59] 6/11 6/15 7/20 8/6 8/9 8/13 8/14 8/18 9/1 9/11 9/12	
point 4 [1] 32/24	Postal [1] 3/1	process [4] 5/7 6/21 17/21 21/6		
pointing [3] 28/16	posting [1] 34/21	processed [3] 56/9 56/20 63/1		
	posts [1] 14/7	produce [4] 16/4 65/18 66/2 66/7		
	potential [1] 75/25	produced [3] 27/4 73/16 78/10		
	potentially [5] 32/8 76/12 78/4 82/3 82/11	producing [3] 4/14 61/10 61/15		
	practice [3] 8/18 28/17 29/9	product [1] 34/6		
		professional [4] 13/24 90/12 90/17 90/18		
		profitability [1] 13/6		

R				S
<p>recall... [48] 10/5 10/8 16/3 16/7 16/19 17/10 23/3 23/21 24/12 28/18 29/10 30/10 41/17 41/24 42/1 42/3 58/2 58/14 59/9 64/7 64/13 64/16 67/15 67/18 67/25 73/10 73/17 73/22 74/5 74/7 74/12 74/16 74/17 75/1 76/17 77/22 77/25 78/17 78/18 78/19 79/16 81/3 81/5 81/23 81/24 82/8 90/3 90/7 recalling [1] 52/23 recalls [3] 73/19 74/4 90/10 receive [1] 9/7 received [6] 17/7 56/2 56/4 56/14 57/2 93/13 receives [1] 92/24 receiving [3] 44/20 52/8 81/5 recent [3] 13/1 68/23 77/4 recently [5] 32/21 64/24 74/2 75/3 79/1 recipient [1] 12/20 recipients [2] 12/17 81/11 recollection [1] 76/16 recommended [1] 21/2 record [8] 19/18 19/20 26/4 26/20 41/20 42/5 55/24 63/4 recorded [5] 40/18 41/1 41/20 41/25 58/3 records [10] 19/25 44/19 62/23 68/4 68/9 69/2 74/2 74/24 75/10 77/6 recoveries [1] 80/15 recruits [1] 7/10 rectified [1] 54/25 red [1] 2/1 redeem [1] 69/17 reduce [1] 15/11 reduced [1] 12/10 reducing [1] 15/13 reduction [4] 12/9 15/3 15/6 15/15 reductions [1] 13/5 reels [1] 48/2 refer [11] 9/3 15/3 17/16 19/11 25/4 25/13 25/15 27/25 36/13 43/5 87/24 reference [16] 2/19</p>	<p>12/14 32/12 42/20 55/4 57/6 58/4 60/10 62/14 64/20 69/7 70/16 75/6 79/4 79/21 81/10 referenced [1] 1/23 references [3] 2/1 54/15 63/21 referred [4] 25/16 35/9 42/10 62/14 referring [4] 19/12 22/12 36/15 52/22 refers [1] 63/1 refresh [1] 65/4 refresher [1] 9/7 refused [6] 36/10 37/1 39/2 39/2 39/6 39/10 regarding [1] 91/4 Regardless [1] 84/7 regret [1] 91/8 regular [1] 11/10 reinstate [1] 23/9 reinstated [4] 24/4 24/16 29/2 90/24 reinstating [1] 23/22 relate [1] 70/6 related [6] 3/23 29/7 56/1 56/3 71/15 88/4 relates [5] 28/9 32/15 47/16 52/13 74/23 relating [13] 10/22 11/4 11/7 11/16 41/18 64/3 65/20 67/7 68/9 68/10 69/2 69/8 75/4 relation [7] 24/1 28/21 42/8 72/6 77/21 86/2 93/4 relevant [13] 17/14 21/11 36/4 40/1 40/15 54/7 61/10 61/15 61/18 63/14 63/21 65/12 82/21 reliability [2] 41/18 82/13 relied [1] 32/9 relocated [1] 16/22 relying [1] 82/4 rem [2] 69/17 70/22 remain [1] 4/7 remaining [2] 13/22 14/8 remains [1] 93/15 remember [10] 9/15 49/13 88/10 88/19 88/20 88/21 88/22 89/8 90/1 90/4 remembers [1] 73/12 Remind [1] 39/14 remmed [1] 69/21 removal [1] 14/21 removed [1] 14/16 Removing [2] 13/20 14/4</p>	<p>repaid [1] 41/23 repayment [5] 21/21 22/6 22/12 22/20 22/25 replaced [1] 10/8 reply [1] 45/22 report [27] 8/5 16/5 26/24 27/3 27/4 27/9 55/4 55/8 57/4 57/7 57/10 57/15 58/4 58/12 58/24 59/5 62/22 63/2 74/1 79/9 87/1 87/2 87/4 87/5 87/25 91/16 92/10 reported [8] 18/1 40/1 40/16 58/2 71/6 72/9 74/11 77/3 reporting [4] 40/13 47/5 69/3 71/13 reports [6] 9/22 19/13 19/19 27/7 50/10 79/12 representatives [3] 93/2 93/6 93/11 represented [1] 29/15 request [17] 1/24 17/18 18/14 31/6 34/15 35/8 35/9 35/11 36/9 36/25 37/2 39/8 67/17 72/25 81/23 82/15 87/22 requested [14] 30/1 30/5 30/10 34/18 37/22 38/2 56/4 67/11 67/15 67/23 71/17 85/17 86/20 86/21 requesting [2] 11/20 17/4 requests [11] 32/19 36/8 36/14 36/17 37/4 37/5 38/3 39/13 63/24 67/18 76/4 required [4] 18/6 19/3 29/14 79/24 residential [1] 7/5 resolution [1] 69/22 resolve [2] 71/22 71/25 resolved [1] 77/24 resort [2] 37/25 38/1 responding [1] 28/8 response [8] 18/6 29/25 30/4 30/9 46/13 47/19 47/24 48/16 responsibilities [1] 17/10 responsibility [3] 13/23 67/2 91/3 responsible [4] 17/2 26/6 37/9 39/5 resubmit [1] 34/23 result [4] 17/6 23/23 42/14 80/11</p>	<p>Retail [2] 3/8 14/24 retain [2] 26/3 26/20 retained [1] 31/5 retaining [1] 19/5 retrieve [1] 37/10 return [1] 69/20 returned [2] 74/3 74/6 returns [3] 74/24 75/10 77/4 reveal [2] 26/4 26/21 review [5] 13/8 74/10 74/14 74/17 90/21 Richard [1] 10/21 right [39] 2/4 3/2 3/10 3/15 3/22 3/25 4/8 4/18 7/1 7/21 10/6 16/11 17/17 19/22 22/9 22/18 36/19 36/20 37/24 38/10 40/24 41/10 42/22 43/13 46/24 50/5 50/13 52/2 52/3 55/18 64/11 66/9 66/18 67/11 74/13 81/2 86/13 86/22 93/25 rights [2] 9/1 24/23 ring [1] 48/4 ringing [3] 49/7 50/20 54/1 risk [6] 3/24 10/16 13/17 13/21 14/9 19/2 RMG [1] 25/2 RMG0000223 [1] 69/7 RMG0000254 [1] 64/20 Rob [1] 74/8 Rob Wilson [1] 74/8 robbery [1] 3/25 robust [9] 82/20 83/5 83/16 83/24 84/8 84/22 85/5 85/14 90/22 role [15] 3/9 3/15 3/19 3/20 4/2 6/22 7/4 13/21 26/3 26/11 26/11 26/12 26/18 91/2 92/22 rolled [3] 5/16 5/20 6/1 rollout [2] 6/13 6/15 room [1] 89/11 round [1] 87/19 Royal [12] 4/6 6/22 7/8 7/14 7/16 7/18 8/3 9/10 13/5 25/5 25/7 25/20 ruined [1] 90/25 run [4] 5/13 7/10 21/18 53/8 running [2] 53/6 92/19</p>	<p>said [39] 19/20 20/6 28/24 38/24 39/10 44/1 44/12 45/9 46/3 46/9 48/4 48/8 48/18 49/1 49/3 49/10 49/23 49/25 50/3 50/6 50/7 50/8 50/17 51/2 51/20 51/21 51/22 52/11 53/6 53/14 73/10 75/1 78/5 84/21 88/13 89/3 89/17 89/19 90/13 sales [3] 14/24 58/17 63/13 same [5] 11/12 15/9 23/15 34/12 54/23 sample [1] 33/4 sat [1] 16/10 satisfied [2] 29/15 92/23 Saturday [1] 50/2 saving [3] 13/19 13/25 14/6 savings [2] 13/9 14/21 saw [1] 49/18 say [51] 4/10 6/16 7/3 8/21 10/20 11/25 16/9 16/16 17/25 18/18 20/21 21/17 23/2 24/13 24/21 25/1 25/25 27/14 28/4 30/8 31/3 32/25 34/9 38/1 38/6 41/4 41/15 43/12 43/21 44/4 44/8 48/20 49/11 50/20 51/9 52/25 55/16 58/1 65/13 65/24 66/25 68/1 77/3 77/8 78/21 82/19 83/9 83/18 89/22 92/12 93/2 saying [16] 30/23 31/25 46/16 49/7 51/1 51/24 69/1 71/13 72/11 72/16 83/16 84/25 85/13 87/23 90/5 90/15 says [27] 12/24 14/14 26/15 43/10 43/18 43/23 44/7 44/9 44/25 45/7 45/15 47/4 48/22 49/14 49/20 51/11 51/19 52/9 52/19 53/2 60/16 66/3 69/16 69/19 70/25 81/14 86/12 schedule [1] 59/21 schedules [3] 26/7 27/15 31/23 Scott [2] 10/8 12/5 scratchcard [5] 56/1 62/23 63/13 68/10 70/5</p>

S	60/12	shortage [7] 17/7 18/1 19/17 41/2 49/22 58/15 69/17	51/24 52/5 53/13 53/19 54/23 55/17 56/9 56/20 58/13 58/20 60/1 61/19 62/24 63/14 66/8 67/17 68/20 69/6 69/14 70/4 71/10 72/8 75/14 76/23 76/24 77/7 77/20 80/19 80/24 84/3 84/16 84/23 87/25 89/25 91/8 92/10 92/24 93/21	stage [14] 5/23 27/7 27/17 27/20 32/1 37/11 37/14 40/8 58/6 59/4 61/3 61/21 61/22 63/22 stages [1] 31/7 stakeholder [1] 18/20 stakeholders [1] 13/11 stamps [1] 53/11 stand [1] 46/11 standard [3] 15/20 34/15 35/8 start [2] 32/24 55/14 starting [3] 16/16 17/23 32/12 starts [1] 12/23 statement [64] 1/14 1/22 1/24 2/2 2/7 2/11 2/13 2/15 2/19 2/22 4/10 5/2 7/3 7/13 7/25 8/2 8/21 9/3 10/13 11/23 15/4 16/9 16/13 16/16 17/23 18/18 19/1 21/16 22/5 24/20 25/23 27/25 28/3 29/25 36/13 40/23 41/15 57/5 58/1 61/7 61/8 61/13 63/5 63/16 63/19 64/2 64/5 64/20 64/24 65/5 65/9 65/16 67/13 68/1 68/23 74/23 75/1 78/21 82/18 82/23 84/21 84/21 85/2 92/7 statements [11] 27/10 27/12 32/8 61/2 61/17 62/20 64/7 64/19 76/10 82/21 83/15 stayed [1] 3/9 Stephen [1] 62/6 steps [2] 18/16 28/5 Steve [2] 79/6 93/23 still [9] 15/20 20/16 22/16 22/24 35/24 49/3 49/5 52/11 52/13 stock [10] 4/12 19/19 57/25 69/20 69/21 69/25 70/2 72/14 72/14 89/10 stood [1] 5/4 stop [1] 77/1 stopped [1] 70/21 straight [1] 50/2 strand [7] 10/20 11/3 11/7 11/22 12/3 16/11 16/18 strands [1] 10/14 streamlined [1] 13/14 structure [2] 13/8 13/14
scratchcards [16] 43/20 43/22 44/7 44/9 46/25 47/10 48/2 56/3 58/17 65/17 65/20 68/11 69/2 70/2 70/7 88/4	sense [1] 58/21 sent [18] 1/24 21/3 27/3 39/10 43/24 45/10 47/9 48/1 48/3 49/21 50/4 51/7 51/13 60/14 62/1 62/5 74/21 79/8 sentence [1] 35/25 sentences [1] 33/8 September [6] 64/21 65/10 66/1 66/9 66/22 67/5 September 2005 [1] 66/1 serious [1] 23/17 serve [2] 22/16 33/12 served [3] 62/20 63/15 63/18 service [4] 14/22 40/4 68/8 71/1 Services [5] 17/2 20/23 21/2 26/25 55/5 session [2] 81/19 92/5 set [5] 7/23 38/25 55/11 65/18 70/10 several [3] 44/2 45/11 48/7 Sharkey [1] 16/20 she [77] 17/14 29/2 41/23 42/6 42/8 42/9 42/12 42/13 44/12 44/18 44/19 44/20 44/20 44/21 44/25 45/15 46/2 46/3 47/6 47/6 47/7 47/10 48/8 48/22 50/19 51/25 52/1 52/1 52/9 52/19 53/20 53/20 53/22 53/24 53/24 53/25 53/25 54/10 54/14 55/24 56/2 56/3 56/4 56/6 56/10 56/11 56/12 56/13 56/23 57/1 57/2 59/11 59/12 67/8 67/22 69/24 70/17 70/25 71/12 71/13 71/20 71/21 71/22 71/25 72/12 72/16 73/15 86/19 88/15 89/11 89/13 89/20 89/24 89/25 90/19 90/23 90/24 she'd [5] 28/24 28/25 47/9 54/12 89/15 she's [3] 51/24 51/25 72/9 sheet [2] 4/14 44/5 sheets [4] 5/10 43/5 43/14 55/24 shop [1] 89/10 short [4] 3/7 10/9 42/13 60/5	shortfall [6] 17/22 19/25 21/25 22/21 29/15 30/8 shortfalls [7] 30/16 39/22 79/18 82/24 85/7 86/9 87/21 should [27] 1/13 15/18 15/19 18/3 19/2 19/20 21/13 22/2 22/23 28/5 36/5 40/16 40/18 46/12 49/17 53/18 59/7 59/14 62/24 63/9 63/13 63/18 63/19 64/14 72/21 83/22 85/17 should've [1] 53/14 show [4] 35/14 35/16 35/21 66/17 showing [1] 61/11 shown [1] 63/5 shows [2] 66/4 67/1 shut [1] 50/16 sic [1] 61/14 sight [2] 2/7 76/15 signature [2] 1/18 1/20 signatures [1] 88/23 signed [2] 63/17 64/22 significant [1] 82/3 signing [1] 26/14 simply [2] 85/3 85/14 Simpson [1] 75/24 since [4] 2/3 2/12 64/5 68/22 Singh [4] 60/12 60/15 61/4 61/19 single [1] 11/18 sir [11] 1/3 39/21 59/18 59/22 59/25 60/7 85/19 85/23 91/21 92/1 93/23 sits [1] 86/4 sitting [1] 7/20 six [3] 66/17 66/21 66/22 skilled [1] 3/20 slightly [1] 34/2 smooth [1] 92/19 so [80] 5/8 5/11 6/15 8/8 15/19 20/6 20/7 22/11 22/24 24/7 25/11 29/4 29/23 30/4 34/9 34/23 34/24 36/8 36/10 37/2 37/4 37/14 39/11 40/7 40/17 41/6 42/3 42/16 43/9 43/11 44/5 44/13 45/16 45/19 45/24 46/24 47/5 48/10 48/14 50/14 50/15 51/20	sole [1] 33/11 solicitor [2] 37/21 42/21 solicitors [2] 92/15 92/16 some [17] 3/20 14/10 28/24 33/9 34/18 37/22 38/2 41/23 43/5 46/17 48/12 55/12 56/1 71/15 90/3 91/2 91/3 somebody [6] 22/10 22/18 23/16 44/14 50/3 50/4 Somebody's [1] 50/21 someone [4] 20/13 21/13 39/22 44/20 something [9] 20/10 20/14 20/19 36/21 48/15 48/24 72/7 74/5 78/8 Sometimes [1] 31/12 somewhere [1] 48/25 sorry [8] 4/23 5/1 27/3 27/16 45/14 45/16 68/16 91/9 sort [9] 44/15 44/21 45/10 47/22 48/6 48/8 48/11 52/7 53/12 sought [2] 47/7 85/2 South [1] 46/2 Southend [1] 88/20 SPA004 [1] 66/21 speak [3] 46/2 76/8 92/11 Special [1] 34/19 specific [3] 28/18 69/1 73/11 specifically [5] 41/17 58/9 63/12 64/17 73/10 specified [1] 33/5 speed [1] 74/5 SPM [1] 63/17 spoken [1] 41/5 spreadsheet [4] 80/7 80/13 80/17 80/21 SPSO [1] 66/1 staff [7] 6/3 6/8 15/1 15/9 20/3 24/15 35/17	

T	28/15 28/18 29/3 29/8 29/11 33/20 63/5 transaction [10] 35/14 38/10 47/9 58/19 72/5 74/24 75/9 77/6 81/17 82/1 transactions [6] 4/15 9/19 66/4 72/6 78/8 81/20 transcript [8] 2/18 42/17 43/2 54/16 55/17 55/19 57/11 87/3 transferred [3] 4/6 4/16 17/11 trial [17] 59/3 60/23 61/6 64/1 64/3 64/8 64/12 64/15 64/16 64/19 68/14 68/18 70/1 73/11 88/10 88/12 88/21 tribute [2] 92/14 92/25 tried [5] 45/10 45/11 48/4 48/6 71/25 trigger [1] 15/10 trouble [1] 70/17 true [1] 2/15 try [1] 18/8 trying [2] 48/7 71/8 turn [4] 1/15 40/20 74/20 85/21 two [13] 13/16 14/1 14/5 14/6 19/24 23/1 37/3 38/23 42/25 64/7 75/4 77/23 92/11 two pages [1] 23/1 two-thirds [1] 42/25 types [1] 35/20	unknown [1] 16/24 unsigned [1] 64/21 unsure [1] 56/3 until [7] 3/9 16/22 39/12 45/12 76/3 90/24 94/2 up [24] 5/14 7/16 10/21 12/6 12/19 33/2 33/7 34/7 35/25 36/2 37/2 42/11 49/7 49/10 53/1 53/8 54/1 54/17 55/1 57/23 62/2 76/21 77/2 90/5 update [2] 79/24 80/3 updates [2] 11/7 80/15 upon [4] 12/5 26/19 31/6 32/9 Urgent [1] 79/24 urgently [1] 80/2 us [4] 1/4 20/6 60/2 60/7 use [4] 5/6 61/12 70/5 77/5 used [5] 4/20 4/23 46/2 58/18 70/4 user [1] 66/21 using [4] 4/25 6/5 80/14 90/7 usually [3] 51/13 57/2 74/10 utility [1] 33/9 Utting [2] 10/9 10/12	wasn't [22] 6/2 6/7 31/14 31/15 34/17 44/21 47/5 53/20 54/2 72/22 73/1 77/17 78/11 84/14 85/4 87/2 87/4 87/5 87/6 88/3 89/11 90/23 way [11] 14/17 34/13 42/25 48/12 58/20 76/9 90/12 90/13 93/7 93/17 93/18 ways [2] 13/15 14/19 we [112] we'll [7] 27/6 53/7 53/7 53/9 58/8 59/3 69/5 we're [1] 47/21 we've [6] 31/22 39/11 43/16 53/8 54/16 55/19 Wednesday [4] 1/1 43/15 50/12 53/10 week [18] 7/5 8/11 42/12 42/13 46/15 46/19 48/21 49/1 49/2 49/7 49/23 50/11 51/3 53/5 54/24 66/9 66/16 67/17 weekly [2] 4/13 4/15 weeks [6] 45/4 51/14 51/16 53/4 57/2 61/16 well [14] 22/9 23/15 24/3 31/25 44/3 45/17 50/7 52/20 54/15 84/20 87/11 89/19 90/10 92/4 went [10] 4/2 17/19 28/23 34/11 45/3 49/2 50/1 50/5 84/20 85/9 were [106] weren't [2] 54/10 69/5 West [3] 76/7 77/11 77/13 West Byfleet [2] 77/11 77/13 what [75] 4/20 4/23 5/2 13/9 13/10 15/6 15/14 16/8 18/6 19/21 20/6 20/13 24/9 26/15 27/1 27/8 28/15 28/24 29/8 30/22 31/21 33/2 35/1 35/21 36/15 38/4 39/1 39/14 45/8 45/20 46/11 46/21 47/21 47/25 48/5 49/1 49/9 49/9 51/1 51/2 51/20 52/11 52/17 52/22 52/25 53/18 58/8 59/3 59/9 59/10 60/1 65/2 66/12 66/15 66/25 67/15 71/12 71/13 72/15 73/14 76/9 77/8 77/22 79/10 81/21	84/2 84/7 84/13 84/24 85/1 85/13 86/12 87/23 88/14 91/2 whatever [2] 11/20 92/22 whatsoever [1] 91/8 when [50] 4/11 4/21 5/18 6/5 6/12 6/17 6/23 7/4 9/14 10/4 10/9 12/1 12/8 19/11 27/3 27/4 27/14 27/23 27/23 28/13 29/18 31/1 35/14 35/15 36/5 36/21 38/12 38/16 46/1 46/14 49/1 49/9 49/12 51/2 51/20 52/23 53/25 54/19 54/20 56/19 57/13 57/17 62/25 63/2 67/22 71/17 83/9 83/15 86/15 88/13 where [40] 4/7 4/16 5/9 5/16 5/19 5/25 17/8 19/24 20/13 24/9 24/13 25/14 26/1 28/19 30/7 30/15 31/14 31/16 34/8 39/22 41/24 43/1 49/1 50/25 53/13 54/25 72/10 74/11 74/13 80/4 80/22 81/1 81/6 82/4 82/24 83/6 85/1 85/3 86/8 87/20 whereby [1] 3/20 whether [23] 18/3 20/23 21/13 22/1 22/22 26/16 30/1 30/5 30/22 31/1 31/22 36/5 36/22 37/9 40/12 41/25 51/13 58/2 59/7 59/14 77/24 84/8 86/11 which [69] 1/23 3/12 5/4 9/19 10/14 12/3 14/22 15/3 16/4 17/21 18/16 18/18 19/13 19/19 20/9 20/11 26/12 30/13 31/8 35/20 36/18 38/12 40/12 41/1 41/20 41/23 42/11 42/13 42/18 43/5 44/5 46/20 47/15 49/24 54/25 56/21 57/8 61/5 62/18 62/25 63/12 65/4 65/6 65/19 65/21 68/13 68/17 68/22 69/14 69/22 70/9 70/10 71/11 71/24 72/21 73/13 73/14 74/1 74/6 74/23 75/12 76/4 76/18 76/25 79/1 80/8 83/19 93/7 93/17 while [1] 44/16
U	unable [5] 42/1 56/20 64/22 70/22 80/8 unbag [1] 53/8 under [8] 19/9 20/3 20/11 25/23 28/6 41/7 52/21 84/9 undermine [2] 19/4 26/5 understand [10] 2/2 8/23 11/2 26/10 26/18 34/3 34/10 47/10 48/6 90/20 understanding [9] 26/23 33/6 33/11 33/14 33/18 42/16 77/8 81/21 84/4 understood [2] 26/17 55/1 undertake [1] 88/2 undertook [1] 8/22 unexplained [1] 47/6 unit [1] 16/21 units [1] 4/12	value [4] 14/17 20/15 38/18 63/7 varied [1] 34/2 various [2] 16/22 93/9 vary [1] 9/20 verdict [2] 74/3 74/6 version [1] 64/23 versus [1] 81/13 very [8] 1/5 9/20 39/20 59/23 60/8 70/4 90/10 93/21 view [3] 10/1 60/23 89/19 viewed [1] 58/20 vindicated [1] 90/20 visible [1] 1/18 visited [1] 56/6 voluntary [1] 18/14	want [3] 52/1 59/23 87/19 wanted [5] 11/15 33/15 37/2 44/14 44/20 Ward [3] 16/20 81/11 81/14 was [264]	W
through... [20] 17/19 43/25 44/11 44/13 45/25 46/5 48/3 48/10 49/5 50/23 65/2 65/12 66/13 68/13 68/17 68/21 70/12 76/20 76/24 86/16 throughout [1] 64/15 Thursday [4] 43/15 50/16 50/17 94/3 thus [3] 13/19 13/25 14/6 till [1] 52/1 time [41] 1/22 4/3 7/11 12/15 16/3 26/9 26/23 27/19 31/13 31/15 33/4 33/11 34/21 36/3 38/15 38/15 39/9 44/18 45/18 47/8 47/22 51/15 54/4 54/24 56/19 57/19 59/9 59/20 60/1 65/13 66/13 67/4 67/16 67/25 72/8 72/18 74/4 78/14 82/9 87/18 89/15 times [4] 16/22 44/3 45/11 48/7 timescales [1] 16/7 timing [1] 81/18 title [1] 39/15 today [1] 75/25 told [5] 44/11 45/24 51/25 52/25 54/10 tomorrow [1] 80/6 Tony [5] 10/5 10/9 10/11 10/12 12/15 Tony Utting [1] 10/9 too [3] 70/22 91/19 93/5 took [4] 42/11 42/18 49/2 86/16 top [2] 43/20 75/7 topic [1] 8/9 topics [2] 7/23 8/6 total [1] 61/14 touch [1] 81/18 touched [2] 31/22 48/23 towards [2] 12/23 55/7 trail [2] 33/24 35/13 trained [2] 9/18 35/20 trainee [1] 92/15 trainers [1] 7/19 training [25] 6/9 7/6 7/13 7/14 7/15 7/18 7/24 9/1 9/7 9/9 9/13 9/15 9/24 9/25 13/20 13/24 28/10 28/12				

<p>W</p> <p>who [29] 5/19 5/25 7/12 11/15 11/17 21/7 22/10 22/18 22/25 23/17 23/25 24/15 33/2 36/2 37/9 37/16 39/2 39/7 39/8 50/4 63/24 68/6 68/15 74/8 83/9 86/3 86/4 87/25 92/16</p> <p>who'd [1] 39/15</p> <p>whole [4] 49/2 49/7 64/11 64/15</p> <p>whom [3] 62/22 86/1 86/3</p> <p>whose [1] 37/19</p> <p>why [15] 22/13 23/12 31/14 31/17 46/22 52/15 56/4 57/15 58/8 67/23 67/25 70/6 77/9 79/8 81/21</p> <p>widely [1] 37/6</p> <p>wider [4] 57/7 67/14 67/19 83/11</p> <p>will [15] 2/23 13/1 14/18 14/22 38/12 50/1 51/7 54/25 60/1 70/25 76/2 76/5 76/8 80/16 92/9</p> <p>willingness [1] 93/12</p> <p>Wilson [1] 74/8</p> <p>wish [4] 2/6 2/10 93/5 93/15</p> <p>wished [1] 25/15</p> <p>within [21] 3/1 6/22 10/14 11/12 12/2 13/21 16/3 16/10 16/18 16/21 21/9 25/3 32/8 37/6 40/11 41/21 57/2 57/10 83/4 83/11 84/3</p> <p>without [3] 34/22 36/18 38/19</p> <p>WITN08920100 [2] 2/19 11/25</p> <p>witness [7] 1/14 2/22 18/25 27/10 27/11 36/13 92/7</p> <p>wonder [1] 59/18</p> <p>wonderful [1] 87/18</p> <p>word [1] 70/5</p> <p>words [4] 39/1 70/4 90/8 90/15</p> <p>work [7] 2/21 3/21 3/23 5/15 15/10 16/14 92/18</p> <p>workaround [1] 76/2</p> <p>worked [2] 5/19 5/22</p> <p>working [6] 3/1 4/11 5/18 11/16 14/19 16/21</p> <p>workings [1] 84/5</p> <p>workload [2] 15/7</p>	<p>15/23</p> <p>workshop [1] 8/22</p> <p>worried [1] 89/24</p> <p>worth [1] 52/6</p> <p>would [116]</p> <p>wouldn't [15] 20/9 22/18 24/5 31/13 38/1 39/3 71/20 72/18 78/2 82/12 89/14 89/17 89/21 89/22 90/18</p> <p>write [1] 5/9</p> <p>writing [1] 8/5</p> <p>written [3] 43/17 45/17 89/16</p> <p>wrong [3] 50/1 50/6 53/6</p> <p>wrote [2] 44/13 45/17</p> <hr/> <p>Y</p> <p>yeah [11] 11/1 12/21 27/18 27/18 36/16 38/14 46/7 49/19 55/9 65/15 85/12</p> <p>year [2] 54/2 92/19</p> <p>years [2] 12/11 58/13</p> <p>yes [106]</p> <p>you [430]</p> <p>you'd [1] 51/10</p> <p>you'll [1] 70/15</p> <p>you're [9] 22/12 23/6 36/15 43/22 44/6 47/1 54/19 54/21 54/21</p> <p>you've [13] 29/8 45/20 46/25 47/2 47/15 49/23 51/14 51/22 52/12 65/6 73/10 87/19 90/14</p> <p>your [86] 1/10 1/14 1/20 1/22 2/2 2/7 2/11 2/11 2/13 2/15 2/16 3/19 4/10 5/2 6/23 6/25 7/3 7/4 7/13 7/24 8/21 9/3 9/9 10/13 11/23 12/19 15/4 15/23 16/4 16/9 16/13 17/23 22/4 22/5 26/12 26/24 27/4 27/5 27/25 28/3 28/11 30/4 32/3 33/10 36/13 40/20 40/22 40/23 45/20 48/13 54/7 54/21 54/22 55/7 57/5 58/1 58/10 58/12 58/23 58/24 59/5 62/7 64/2 64/5 65/4 68/23 72/17 73/3 74/22 75/1 76/16 77/8 77/10 78/21 78/21 80/2 81/21 84/13 86/5 86/25 87/4 87/6 87/12 87/25 89/19 91/16</p> <p>yourself [1] 54/19</p>			
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