

Friday, 26 January 2024

1
 2 (10.29 am)
 3 **MS PRICE:** Good morning, sir, can you see and hear us?
 4 **SIR WYN WILLIAMS:** Yes, I can, thank you very much.
 5 **Witness statement of JAMES McLERNON adduced**
 6 **MS PRICE:** Sir, before we turn to Ms Winter's evidence,
 7 could I deal, please, with the witness statement of
 8 James McLernon, who is a Principal Public Prosecutor in
 9 the High Court and International Section of the Public
 10 Prosecution Service in Northern Ireland. For the
 11 transcript, his statement can be found at WITN10280100.
 12 There is no need to bring that up on screen but I can
 13 confirm, sir, that that witness statement has been
 14 disclosed to Core Participants.
 15 Mr McLernon's evidence is relevant predominantly to
 16 Phase 4 but the final three paragraphs are relevant to
 17 Phase 5 of the Inquiry. For the purposes of Phase 4,
 18 can I please indicate that paragraphs 1 to 30 are to be
 19 treated as read into the Inquiry's record, although I do
 20 not intend to read the contents of those paragraphs out
 21 now. As a result, this evidence may be taken into
 22 account by you in due course, even though it has not
 23 been subject of oral evidence during Phase 4.
 24 As for the remaining paragraphs in Mr McLernon's
 25 witness statement, namely paragraphs 31 to 33, these

1

1 your knowledge and belief?
 2 **A.** They are.
 3 **Q.** For the purposes of the transcript, the reference for
 4 Ms Winter's statement is WITN10400100. Ms Winter,
 5 I will not be asking you about every aspect of the
 6 witness statement you have provided, which will be
 7 published on the Inquiry website in due course. I will
 8 instead be asking you about certain specific issues
 9 which are addressed in it.
 10 **A.** That's right. That's okay.
 11 **Q.** Starting, please, with the roles you have held with the
 12 Post Office, you started work as a counter assistant in
 13 a sub post office in Randalstown in Northern Ireland in
 14 1973; is that right?
 15 **A.** Yes.
 16 **Q.** In 1976 you gained employment in a Crown Office branch
 17 working on the counter?
 18 **A.** That's right.
 19 **Q.** After two years you progressed to a Secure Area role; is
 20 that right?
 21 **A.** Yes.
 22 **Q.** Then you held various roles over a period, including
 23 an Auditor role and a Sales Manager role; is that right?
 24 **A.** Yes.
 25 **Q.** Until, in around 1997 or 1998, you were successful in

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1 will either be the subject of oral evidence or read into
 2 the record in Phase 5. I should also confirm that this
 3 witness statement will be published in its entirety on
 4 the Inquiry's website after today's hearing.
 5 **SIR WYN WILLIAMS:** Thank you very much.
 6 **MS PRICE:** May we proceed, then, please, to call Ms Winter.
 7 **SIR WYN WILLIAMS:** Yes, of course.
 8 **MS PRICE:** As you know, sir, Ms Winter appears remotely
 9 following your grant of permission for her to do so.
 10 **SUZANNE WINTER (sworn)**
 11 **Questioned by MS PRICE**
 12 **MS PRICE:** Good morning, Ms Winter. Thank you for appearing
 13 this morning to assist the Inquiry in its work. As you
 14 know, I will be asking you questions on behalf of the
 15 Inquiry. You should have hard copy of a witness
 16 statement in your name, dated 2 January 2024, in front
 17 of you; do you have that?
 18 **A.** Yes, I have.
 19 **Q.** Could you turn, please, to page 40 of that statement?
 20 **A.** Yes.
 21 **Q.** Do you have a copy with a visible signature?
 22 **A.** I have.
 23 **Q.** Is that your signature?
 24 **A.** It is.
 25 **Q.** Are the contents of your statement true to the best of

2

1 applying for a role with the Royal Mail Security team as
 2 an Investigator; is that right?
 3 **A.** Yes, it would have been maybe just slightly before then
 4 but yes.
 5 **Q.** You say slightly before. In your statement you said
 6 1997 or 1998. Do you think it was a little earlier?
 7 **A.** That's right. No, you're right.
 8 **Q.** Is it right that that role involved detecting external
 9 offences against Royal Mail rather than investigating
 10 suspected offences committed internally by Royal Mail
 11 agents or employees?
 12 **A.** Yes, it was Royal Mail and it was investigating theft in
 13 the post or birthday cards.
 14 **Q.** You then moved in 2001, after a business reorganisation,
 15 to Post Office Limited based in Belfast as
 16 an Investigations Manager in the Post Office Security
 17 Team; is that right?
 18 **A.** Yes.
 19 **Q.** At that stage, is it right that your role was limited to
 20 investigations of internal suspected offences against
 21 the Post Office?
 22 **A.** Yes.
 23 **Q.** But, after a further reorganisation of the business,
 24 your role expanded also to cover physical security,
 25 robberies, burglaries, and the like; is that right?

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1 A. That's right.
 2 Q. You do not provide a date for this change to your role
 3 in the statement. We have heard from another witness
 4 that the expansion of the Investigator role to include
 5 physical security occurred as a result of
 6 a reorganisation which took place in around 2011. Does
 7 that sound about right to you or not?
 8 A. That would have been about right, yes.
 9 Q. Is it right that you remained in the Investigation Team
 10 until you left the Post Office in December 2014, having
 11 taken voluntary redundancy?
 12 A. Yes.
 13 Q. Were you based in Northern Ireland for the whole of your
 14 career with the Post Office?
 15 A. I was.
 16 Q. I would like to turn, please, to your Investigator
 17 training. Should we take it from the career history set
 18 out in your statement that you did not have any
 19 experience of criminal investigation or criminal law
 20 when you first became a Royal Mail Investigator?
 21 A. That's right.
 22 Q. In terms of the initial training that you had when you
 23 became a Royal Mail Investigator, you say at paragraph 8
 24 of your statement that you were given three weeks of
 25 training in the Royal Mail training school in Milton

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1 training in 2001 covered working on the Horizon system?
 2 A. Yes.
 3 Q. Can you help with what the training on working on the
 4 Horizon system consisted of, please?
 5 A. I remember getting Horizon training whenever we were on
 6 the training course and also whenever I came back to
 7 Belfast. I sat in -- my office was beside the training
 8 school and I arranged for me to sit in whenever
 9 subpostmasters were being trained for me to sit in with
 10 the school and be trained as well.
 11 Q. So your training was on using the Horizon system; is
 12 that right?
 13 A. Yes.
 14 Q. As opposed to analysing any data from that system?
 15 A. That's right.
 16 Q. You refer at paragraph 9 of your statement to the 2001
 17 training, including data analysis. What sort of data
 18 were you trained to analyse on that initial three-week
 19 training?
 20 A. On the initial three-week training that was really
 21 actually maybe using the system. I did more analytic
 22 work whenever I came back to Belfast and in the training
 23 school, and that's whenever I did some more of analysis
 24 because I was with the trainers and they would answer my
 25 queries or explain to me how to read the data that

7

1 Keynes; is that right?
 2 A. That's right.
 3 Q. Which you say covered all aspects of the role, including
 4 witness statement taking, analysing data, interviewing
 5 suspects, PACE, risk assessments and surveillance. When
 6 you refer to analysing data, what kind of data do you
 7 mean, bearing in mind this is the initial training in
 8 '97 or '98?
 9 A. With Royal Mail Investigation, you would be analysing
 10 data of lost mail, customers that have reported losing
 11 mail during the course of its -- in the Royal Mail
 12 centre; you would be looking at access records, who has
 13 access to mail, absence records; and you would be
 14 following from the time that the letter or the item was
 15 posted until it disappeared.
 16 Q. You also received training when you moved to become
 17 an Investigator with the Post Office in 2001, didn't
 18 you?
 19 A. Yes.
 20 Q. You say at paragraph 9 of your statement that training
 21 was at the training college in Milton Keynes and also
 22 lasted three weeks?
 23 A. Yes.
 24 Q. In addition to the topics you identified from your Royal
 25 Mail training, you say in your statement that the

6

1 you're getting from the system.
 2 Q. What were you taught to look for in the data?
 3 A. In the data, you would look for whenever cash
 4 declarations are made, you would look for user IDs, you
 5 would look for the transactions that the customers have
 6 said had taken place and you would be taught on the
 7 different codes within the Horizon system.
 8 Q. What was the purpose of the data analysis you were being
 9 taught about?
 10 A. Really it was to learn how the system worked and, for
 11 instance, how one transaction can be different and shown
 12 differently on the computer system as another
 13 transaction. You could see how Branch Trading
 14 Statements were done at the end of the accounting week.
 15 Q. Were you taught how to look in Horizon data for errors
 16 made by the system?
 17 A. No.
 18 Q. Were you trained on the audit data which was available
 19 on request from Fujitsu, over and above the data which
 20 was available to be printed from a counter in branch?
 21 A. You could read to it a certain extent. Did you mean the
 22 ARQ, the data?
 23 Q. Yes. I am asking though, in terms of your training,
 24 whether you were trained on that audit data, the ARQ
 25 request data from Fujitsu?

8

- 1 A. Not on that training.
 2 Q. Were you trained later on that?
 3 A. Later, as you worked within the office and worked with
 4 Horizon, you came aware of some data that would be on it
 5 but in no way would I be an expert on it.
 6 Q. Were you given any guidance at your initial training in
 7 2001 on the circumstances in which audit data should be
 8 requested from Fujitsu?
 9 A. In that initial training, no. You were not told how to
 10 get any information from Fujitsu, because you were told
 11 that the system was 100 per cent reliable.
 12 Q. Who told you that, that the system was 100 per cent
 13 reliable?
 14 A. Whenever you were at the training college.
 15 Q. You have referred in your statement to being told on
 16 initial training that the system was completely
 17 reliable. So focusing for now in 2001, who was
 18 delivering that message then?
 19 A. That would have been the training school in Milton
 20 Keynes.
 21 Q. Were these Royal Mail trainers?
 22 A. Post Office.
 23 Q. Post Office trainers. Was there anyone from Fujitsu at
 24 that initial training delivering that message?
 25 A. No.

9

- 1 guilty of the suspect?
 2 A. Yes, I do recall.
 3 Q. Do you recall being told about the duty to record,
 4 retain and review all material collected or generated
 5 during an investigation so that it could be considered
 6 for disclosure?
 7 A. Yes.
 8 Q. Do you recall being told of the need to draw any unused
 9 material capable of undermining the prosecution case or
 10 assisting the defence case to the attention of the
 11 reviewing lawyer?
 12 A. Yes, I do.
 13 Q. Were you made aware that the duty to follow lines of
 14 inquiry, which led away as well as towards the guilt of
 15 a suspect, extended to material in the hands of a third
 16 party, for example Fujitsu?
 17 A. Sorry, could you repeat that question again?
 18 Q. Of course. So the duty to follow lines of inquiry which
 19 led away from as well as towards the guilt of a suspect,
 20 were you told that that duty extended to material in the
 21 hands of a third party, for example, Fujitsu?
 22 A. Yes.
 23 Q. Was any part of the training delivered in 2001 delivered
 24 by lawyers, as opposed to Post Office trainers?
 25 A. In 2001, yes, there was training in Milton Keynes by

11

- 1 Q. When you had your training on the Horizon system, was
 2 there anyone from Fujitsu delivering that message that
 3 Horizon was completely reliable?
 4 A. No.
 5 Q. Another topic you list as having been covered in 2001
 6 was full disclosure. Did the training on this include
 7 you being told that, where you were the Lead
 8 Investigator in a case, you would also usually be the
 9 Disclosure Officer in the case?
 10 A. Yes.
 11 Q. Were you made aware that this was a distinct role, held
 12 over and above your role as an Investigator, which
 13 carried with it distinct duties?
 14 A. Yes.
 15 Q. Do you recall being told what those distinct duties on
 16 a Disclosure Officer were?
 17 A. Yes.
 18 Q. Do you recall being told about the duties and
 19 responsibilities on Investigators and Disclosure
 20 Officers under the Criminal Procedure and Investigations
 21 Act 1996 and its associated Codes of Practice?
 22 A. Yes.
 23 Q. Do you recall being told about the duty on all
 24 Investigators to pursue all reasonable lines of
 25 investigation, whether they led towards or away from the

10

- 1 lawyers.
 2 Q. Which aspects of the training were delivered by lawyers?
 3 A. It was Post Office lawyers and it was with regard to
 4 committal papers going to court, and attending court,
 5 and the legal side of the system.
 6 Q. Was that the Criminal Law Team from Royal Mail?
 7 A. It was.
 8 Q. You travelled to Milton Keynes for your Royal Mail and
 9 Post Office Investigator training. Did this training
 10 covering the criminal law or procedure in Northern
 11 Ireland at all?
 12 A. I would have to say not really.
 13 Q. Is it right that you attended search training both when
 14 you became an Investigator with Royal Mail and when you
 15 became a Post Office Investigator in 2001?
 16 A. Yes, I did.
 17 Q. That was provided by Thames Valley Police on both
 18 occasions?
 19 A. Yes, it was.
 20 Q. What were you told on that training about the basis for
 21 the Post Office conducting searches as part of their
 22 investigations?
 23 A. For conducting a search, you needed to have sufficient
 24 people doing the search: you had a notetaker, you had
 25 the person that was -- maybe two people doing the

12

1 search. So after an incident in 2000, where one of the
 2 Post Office Investigators was shot and killed, we had to
 3 have an additional person during the search for health
 4 and safety.

5 **Q.** In terms of the basis for conducting searches, though,
 6 what were you told about the grounds on which the Post
 7 Office could search premises, for example?

8 **A.** You could only search premises with the person's
 9 permission. It was a voluntary search, the same as for
 10 a vehicle.

11 **Q.** Is it right that after your training in 2001 you were
 12 mentored by -- you refer to him as Les Thorpe -- for six
 13 months, and he was your line manager?

14 **A.** Yes, that's right.

15 **Q.** Did he give you any guidance on lines of inquiry or
 16 disclosure while he was mentoring you?

17 **A.** Yes, he did.

18 **Q.** What did he tell you?

19 **A.** He had been an Investigator, I think, for some time and
 20 Les would have mentored me to ensure that you completed
 21 the relevant documents, that you were putting forward
 22 all evidence that you had and that the different
 23 enquiries that you possibly had to make to make sure you
 24 had done the job as best you could.

25 **Q.** At paragraph 27 of your statement, you refer to there

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1 Page 11, please. Scrolling down, please, to
 2 paragraph 15, you say here:

3 "Any legislation, policies or guidance governing the
 4 conduct of investigations conducted by the Security Team
 5 during my period of working within that team, if
 6 relevant, would have been communicated usually by Policy
 7 and Standards or the Casework Team. From my
 8 recollection a different caution was issued in Northern
 9 Ireland and the Police and Criminal Codes of Practice in
 10 Northern Ireland were followed rather than their England
 11 and Wales equivalent. The correct routines for
 12 [Northern Ireland] were applied. Different, [Northern
 13 Ireland] specific, forms would also be used when
 14 conducting a formal interview."

15 Was this communication of legislation, policy or
 16 guidance communication of new or amended legislation,
 17 policy or guidance?

18 **A.** This was our guidance for Northern Ireland. Whenever
 19 I went to the training college, they would have been
 20 training everyone on England and Wales, and then
 21 usually, as an afterthought, they would have said, "Oh
 22 by the way, it's a different (*unclear*) within Northern
 23 Ireland, you have to use different forms in Northern
 24 Ireland", so my job was always to make sure that those
 25 correct forms were used.

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1 being subsequent workshops and refresher training after
 2 your initial training, when there were significant
 3 changes to legislation, or working arrangements within
 4 the Casework Team. How often did workshops or refresher
 5 training take place; can you recall?

6 **A.** I don't recall a lot of workshops/refresher training.
 7 You're maybe talking maybe once every six months or --
 8 I don't recall a lot of it. It would be if there was
 9 some changes, perhaps, within the policies.

10 **Q.** Do you recall who provided this training?

11 **A.** The training was usually done by, possibly, Senior
 12 Managers, whenever you went to a workshop.

13 **Q.** Can you recall an example of a significant change to
 14 legislation that prompted a workshop or refresher
 15 training?

16 **A.** I'm sorry, I can't recall.

17 **Q.** Was there any Northern Irish specific training given to
 18 you, as an Investigator, by the Post Office?

19 **A.** No.

20 **Q.** Turning, please, to policy and guidance, how would you
 21 access Northern Irish legislation or Codes of Practice
 22 if you needed to refer to them?

23 **A.** I would have liaised with the police.

24 **Q.** Could we have paragraph 15 of Ms Winter's statement on
 25 screen, please. It is page 11 of WITN10400100.

14

1 **Q.** What was the method of communication by Policy and
 2 Standards or the Casework Team?

3 **A.** With the Policy and Standards, they would have issued
 4 new policies and, again, it most likely would have had
 5 above it "This applies to England and Wales", and then
 6 usually at the bottom paragraph it would maybe say --
 7 for Scottish law there would be one line and for
 8 Northern Ireland law another line, so sometimes,
 9 usually, you had to go and look in Policy and Standards
 10 where -- you could get it on the computer, Policy and
 11 Standards but I usually always checked again with the
 12 police.

13 **Q.** In a more practical sense, how were these documents sent
 14 to you or were they simply on the system?

15 **A.** They would be sent to you as the policies changed, and
 16 maybe would be discussed, depending on what the policy
 17 was, whenever you were having a team meeting. But then
 18 you were told they would be on the -- on the computer
 19 where you could go into the program and look at the new
 20 policies.

21 **Q.** Was that something that all Investigators had access to?

22 **A.** Yes.

23 **Q.** Taking an example of a policy document covering
 24 investigation procedures specific to Northern Ireland,
 25 could we have on screen, please, POL00039952. This

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1 document is dated November 2002 and appears to be
2 an appendix to an investigation policy applicable to
3 investigations in Northern Ireland. The title is "Notes
4 of interview, Northern Ireland".

5 Did you recognise this document when it was sent to
6 you by the Inquiry?

7 **A.** I do recognise that document.

8 **Q.** Is that the sort of document which would be sent to you
9 by Policy and Standards or Casework?

10 **A.** Yes.

11 **Q.** Could we have on screen, please, paragraph 28 of
12 Ms Winter's statement. It is page 17 of that statement.
13 At paragraph 28 you say this:

14 "To assist with Northern Ireland law, I would have
15 taken advice from PSNI ..."

16 Is that Police Service Northern Ireland?

17 **A.** Yes.

18 **Q.** "... or PPS."

19 Is that the Public Prosecution Service?

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

21 **Q.** "There would be circumstances where information would be
22 sought from third parties who might hold relevant
23 evidence where shortfalls were identified in branch,
24 eg the Paid Order Unit. In [Northern Ireland] the
25 various departments were relatively small and we

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1 **A.** Mainly from the police and from the Crown Prosecution
2 Service. There was a few cases where I was maybe
3 involved in England, and that would have come underneath
4 the Post Office Criminal Law Team.

5 **Q.** The reference here to third parties who might hold
6 relevant evidence, you give an example of the Paid Order
7 Unit; what was that?

8 **A.** The Paid Order Unit was a unit in Lisahally in Derry,
9 Londonderry, and it's where paid pension foils were sent
10 from all the post offices, and they were accumulated in
11 the Paid Order Unit in Lisahally.

12 **Q.** You don't list there Fujitsu as a third party who might
13 hold relevant evidence where shortfalls were identified.
14 Is that because Fujitsu did not spring to mind as
15 someone you would approach in those circumstances?

16 **A.** Not in those circumstances and I never had direct
17 contact with Fujitsu, whereas the likes of the Paid
18 Order Unit, I had direct contact.

19 **Q.** I'd like to turn, please, to your role as
20 an Investigator. Could we go to page 5 of this
21 statement, please. Towards the bottom of the page,
22 paragraph 11. About three lines down, you say:

23 "As an Investigator my role was to interview Post
24 Office employees and agents who were suspected of, or
25 had admitted to, committing a criminal offence and to

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1 maintained close contact."

2 First of all, when you refer to the various
3 departments, do you mean the PSNI and the PPS?

4 **A.** Yes, that would be for the Northern Ireland law.

5 **Q.** So the various departments that were relatively small
6 and you maintained close contact with, that was
7 departments within the PSNI and the PPS?

8 **A.** Yes, that's right.

9 **Q.** How small were the departments you were dealing with?

10 **A.** The PSNI would have been the fraud branch in Belfast and
11 the PPS was The Crown Prosecution office in Belfast.

12 **Q.** In terms of the size of your own team, you say in
13 paragraph 9 of your statement that, although you had the
14 grade of a manager, you did not have anyone working to
15 you, so you were effectively a one-person department.
16 Was it the case that, throughout the time you were
17 a Post Office Investigator in Northern Ireland, you were
18 a one-person department, or did that change?

19 **A.** No, it was always a one-person department. You didn't
20 have staff. It was just a title.

21 **Q.** Should we take it from this and this paragraph here, 28,
22 that any specific guidance you needed on Northern Irish
23 law or procedure came from the Police Service Northern
24 Ireland or the Public Prosecution Service, rather than
25 the Post Office?

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1 ascertain the facts in the inquiry."

2 You deal with an Investigator's involvement when
3 a branch was being audited at paragraph 20 of your
4 statement, that's page 13, please. Four lines up from
5 the bottom there, you say:

6 "The Investigator's role on attendance would be to
7 introduce themselves, their Second Officer and the Audit
8 Team. They would explain why they were visiting the
9 office, issue a caution, advise the person of their
10 legal rights and Post Office Friend Rule, make
11 a notebook entry recording that. The Investigator would
12 remain on site and await the final outcome of the audit
13 and report to the Contracts Manager and to the line
14 manager. If there was no reasonable explanation for
15 a loss identified the Investigator would remind the
16 person they were still under caution and invite them for
17 a formal interview."

18 In terms of how a suspicion of the commission of
19 a criminal offence was established, so as to prompt
20 formal interview, was it the case that anyone
21 experiencing an unexplained shortfall in a branch was
22 considered a suspect?

23 **A.** No.

24 **Q.** So that's not what you mean when you say "When there was
25 no reasonable explanation for a loss identified, the

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1 Investigator would remind the person they were still
 2 under caution and invite them for a formal interview"?

3 **A.** Not everyone would be asked. It would not be everyone
 4 that you would ask to send for an interview. It would
 5 depend on the outcome of the audit.

6 **Q.** But if there was an apparent shortfall and it was
 7 unexplained, in the sense that no reasonable explanation
 8 had been given, it seems to be your evidence here that
 9 that prompts suspicion --

10 **A.** Yes.

11 **Q.** -- suspicion that prompts a formal interview; is that
 12 right?

13 **A.** That would prompt, and the interview is voluntary.

14 **Q.** You have said in your evidence this morning that you
 15 were aware of the obligation on an Investigator to
 16 pursue lines of inquiry pointing away from, as well as
 17 towards, the guilt of a suspect. Did you ever consider
 18 that that obligation required you to get to the bottom
 19 of a shortfall or an apparent shortfall, in other words
 20 to pinpoint the point at which loss occurred, and to
 21 demonstrate an actual loss?

22 **A.** Yes.

23 **Q.** Did you always do that, try to get to the bottom of
 24 a shortfall and pinpoint an actual loss?

25 **A.** Yes, I absolutely did.

21

1 **Q.** "... and police contacts, optimising POCA powers to
 2 achieve maximum possible recovery (eg monetary
 3 recovery/asset recognition).
 4 "Ensure all intervention measures are adopted to
 5 recover stolen funds."
 6 Is it right that, as an Investigator, you were set
 7 a target for the recovery of money from those who were
 8 being investigated?

9 **A.** Yes, that 65 per cent rate was for fraud loss recovery.
 10 The senior team in the Security were always trying to
 11 get as much money back as they possibly could.
 12 65 per cent was for fraud loss.
 13 Whenever -- just to explain, whenever
 14 an investigation starts, it's two pronged. You have the
 15 criminal investigation, which I would have investigated
 16 in Northern Ireland, and then you would have had the
 17 Contracts team. Now, with the criminal investigation,
 18 I would have performed my duties to look into all the
 19 loss, conduct the inquiry and you are always asking --
 20 we were told every time you interview someone, you had
 21 to ask them could they repay the money?
 22 If at that stage the criminal investigation is not
 23 going any further, that is closed down. But the
 24 Contracts team, they remain continuing and they will ask
 25 for the money back. So you will have a situation where

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1 **Q.** So, as far as you're concerned, in all your cases you
 2 established an actual loss; is that what you're telling
 3 us?

4 **A.** No, not establish an actual loss. I would have done my
 5 best, to the best of my ability, to establish where this
 6 loss happened and how it happened and to explain where
 7 it had gone.

8 **Q.** Could we have on screen, please, POL00105025. This is
 9 document is the individualised objectives for Security
 10 Team members for 2013 to 2014. The objectives for you
 11 are set out at pages 136 to 139. Could we have page 136
 12 on screen first, please. We can see here your name and
 13 the first two boxes on this page refer to core
 14 behaviours. Then over the page to 137, please. This
 15 objective is set out:
 16 "To ensure a robust approach to fraud loss recovery
 17 with a return rate of 65%.
 18 "Activity to include:
 19 "Ensure that evidence opportunities are maximised
 20 through stakeholder engagement, technical elements of
 21 enquiries are effectively deployed -- [searches
 22 persons/premises]
 23 "Ensuring full engagement with FIs ..."
 24 Is that Financial Investigators?

25 **A.** Yes.

22

1 I've investigated a case but it hasn't gone for
 2 prosecution, but it's the Contracts team that are asking
 3 for the money back.

4 **Q.** The target was, by this point, 65 per cent. Had there
 5 been a different, lower target in earlier years; do you
 6 recall?

7 **A.** Yes, I do believe there was and it was maybe the last
 8 three or four years, there was more pressure put on
 9 everyone by the senior team to increase this figure.

10 **Q.** Do you recall the reason for the increase?

11 **A.** I don't think they gave a particular reason to us, as
 12 a Security Team. We just felt there was more pressure
 13 put on you. You have to understand also that all of
 14 these objectives, that 65 per cent was just a small part
 15 of what you had to achieve: you were targeted in
 16 everything that you did, you were marked on everything
 17 that you did and you were spoken with at the end of
 18 every month if you were not meeting the standards that
 19 they required.

20 **Q.** Did those standards include there being a certain number
 21 of investigations or level of investigations that you
 22 were pursuing?

23 **A.** No, because you couldn't -- it just depended on the
 24 information that you'd got or investigations. In
 25 Northern Ireland, you could maybe just have two

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1 investigations going or you might have five
 2 investigations going. That would -- you had no control
 3 over that, over that figure. You didn't have any
 4 control over that.

5 **Q.** Was your -- I'm sorry, please go ahead.

6 **A.** I could be investigating a case and it's not criminal,
 7 I feel there's no information there, there isn't
 8 sufficient information to say it was any criminal
 9 activity, so then that would go straight back to the
 10 Contracts team and they would then be involved. I would
 11 have no involvement. They were completely two different
 12 areas: Contracts and Criminal Investigations.

13 **Q.** Was your performance measured, at least in part, against
 14 your recovery target, and here that being 65 per cent?

15 **A.** Yes.

16 **Q.** What happened if you didn't meet that target?

17 **A.** You -- you just didn't meet that target. You would
 18 maybe be trying to increase your figures on other parts
 19 of the objectives where you are being proactive in
 20 educating people on having good security within their
 21 post office and making sure they have all their
 22 procedures in place.

23 **Q.** Was meeting this target rewarded in any way by the Post
 24 Office?

25 **A.** I don't think it was. You were given a mark, it was

25

1 **Q.** Thank you. That document can come down now, please.
 2 Being a one-person department, what supervision was
 3 there over your cases?

4 **A.** I would have had daily contact with -- originally, it
 5 was Les Thorpe -- with my manager. You ensured that you
 6 spoke with the each other at least every couple of days,
 7 and then you had one-to-one meetings every month. My
 8 line manager would have flown over to Belfast and we
 9 would have had one-to-one meetings. Then you would have
 10 had a team meeting. Team meetings, again, would have
 11 most likely been once a month, where I would have flown
 12 over to London or Manchester or Glasgow.

13 **Q.** Did you discuss the issues which arose in your cases
 14 with other Investigators in other parts of the United
 15 Kingdom?

16 **A.** No.

17 **Q.** Do you think you would have benefited from the
 18 opportunity to be able to do so?

19 **A.** I do.

20 **Q.** Turning, please, to the process for criminal
 21 investigation and prosecution of Post Office agents,
 22 their staff and Post Office employees in Northern
 23 Ireland, could we have on screen, please, paragraph 23
 24 of Ms Winter's statement, that is page 15. You say here
 25 at paragraph 23:

27

1 like an appraisal mark and, depending on how well you
 2 had done in these objectives, you were marked from 1 up
 3 to 5.

4 **Q.** Was this a target which was set for all Post Office
 5 Investigators?

6 **A.** Yes. I believe it was. I would not have seen -- those
 7 objectives that you're showing on the screen were my own
 8 personal objectives and, once you were given them, then
 9 they were most likely put on the computer, as you've
 10 done here today, and we could see then everybody else's.
 11 But, I mean, I didn't go looking to see "Oh what is
 12 everybody else doing?" I was just concerned with what
 13 I had been targeted to.

14 **Q.** Do you think that this target ever influenced the
 15 conduct of investigations you were charged with?

16 **A.** No.

17 **Q.** Looking, please, to the first bullet point in that box,
 18 what did it mean in practice to maximise evidence
 19 opportunities?

20 **A.** You ensured that any evidence that you had, that was
 21 available, that you had been sure to go down that road
 22 of every enquiry to make sure all the stakeholders --
 23 you'd spoken to the stakeholders, you knew what was
 24 involved and that you hadn't left really any stone
 25 unturned.

26

1 "Following an investigation in Northern Ireland
 2 a suspect offender file would be prepared and forwarded
 3 to Head of Security for any recommendations. They would
 4 review the information available and make any decisions.
 5 The decision would be communicated to the Casework
 6 Manager and the file would then be returned to me."
 7 Pausing there, so is it right that, before a case
 8 would be put forward to the prosecution decision maker,
 9 the Head of Security had to sign off on that course?

10 **A.** Yes.

11 **Q.** In Northern Ireland, was there any input into the
 12 decision on whether to refer a case to the prosecution
 13 decision maker from the Royal Mail, or later Post
 14 Office, Criminal Law Team?

15 **A.** No.

16 **SIR WYN WILLIAMS:** When you say, "Head of Security", just so
 17 that I'm clear, do you mean by that the Head of the
 18 Security Team for the UK or do you mean someone in
 19 Northern Ireland?

20 **A.** It would have been the Head of Security for the UK,
 21 I remember John Scott.

22 **SIR WYN WILLIAMS:** Thank you, yes.

23 **MS PRICE:** Could we have on screen, please, paragraph 39 of
 24 Ms Winter's statement, that is page 21. At paragraph 39
 25 you say this:

28

1 "When I joined the Post Office Security Team there
2 was no internal prosecution process in place as Northern
3 Ireland has its own courts and system. As I had worked
4 in Royal Mail Security previously and cases were handed
5 to the police, a similar process was put in place for
6 Post Office Investigations. I worked with the Post
7 Office Security Team, Post Office Legal team, PSNI,
8 [that's Police Service Northern Ireland] and the Public
9 Prosecution Office to develop and agree a Memorandum of
10 Understanding on how to progress suspect offender files
11 through the courts."

12 The work you refer to here, to put in place
13 a Memorandum of Understanding was that first done in
14 2001 when you first joined the Post Office Security
15 Team?

16 **A.** Yes.

17 **Q.** You refer here to the Public Prosecution Office. It is
18 the Inquiry's understanding that in 2001, criminal cases
19 were prosecuted by the Department of the Director of
20 Public Prosecutions, the Public Prosecutions Service
21 having been established later, in around 2005. Does
22 that accord with your understanding?

23 **A.** Yes, that would be right.

24 **Q.** So is your reference here to the Public Prosecutions
25 Office a reference to the Department of the Director of

29

1 I was doing because I just couldn't go and do whatever
2 I wanted. I needed to let them know I was involved in
3 this process.

4 **Q.** I see. The Inquiry has been unable to locate a copy of
5 any written Memorandum of Understanding dating to the
6 time you joined the Post Office Security Team. Can you
7 help with whether this Memorandum of Understanding was
8 formally committed to a written agreement or whether it
9 was instead agreed more informally?

10 **A.** It had to be a written agreement because it was stated
11 down how the file would be progressed and, before that
12 written agreement was made, there was meetings with the
13 police and with the Director of Public Prosecutions and
14 with the a Senior Manager from the Post Office and
15 myself. And then the Memorandum of Understanding was
16 signed off by the Chief Superintendent and a copy was
17 kept in Belfast of that Memorandum.

18 **Q.** In terms of what was agreed and the process which was
19 put in place, you deal with this at paragraph 41, which
20 is on towards the bottom of this page of the statement.
21 But you have also provided a slightly more detailed
22 account at paragraph 23 of the statement, and I'd like
23 to look at that, please.

24 Could we have page 15. We looked at the start of
25 this paragraph earlier, picking up from five lines down:

31

1 Public Prosecutions in 2001?

2 **A.** Yes.

3 **Q.** Can you help with how cases which were investigated by
4 the Post Office in Northern Ireland were progressed to
5 the DPP before you helped to put in place the process
6 you have outlined here?

7 **A.** There was no process in place whenever I took the post
8 of an Investigator in Northern Ireland for prosecutions.

9 **Q.** Who, from the Post Office Legal team, did you work with
10 on the development of a Memorandum of Understanding?

11 **A.** I didn't work with anyone of the Post Office Legal team.

12 **Q.** Well, you say here:

13 "I worked with the Post Office Security Team, Post
14 Office Legal Team, PSNI and the Public Prosecution
15 Office to develop and agree a Memorandum of
16 Understanding ..."

17 So I'm asking who from the Post Office Legal team
18 you worked with to do that?

19 **A.** I wouldn't have actually worked with them; they would
20 have been involved -- whenever I say "worked with", they
21 would have been involved in my taking part in agreeing
22 the Memorandum of Understanding, really just to let them
23 know what was happening. They would not have given
24 advice because it was for Northern Ireland law but it
25 was to keep them posted and they were involved in what

30

1 "Once the Casework Manager authorised progression of
2 the file I produced an Evidential Report and handed it
3 to the PSNI. The PSNI would consider the material and
4 discuss the Report with me, if any additional material
5 would be required and how to set out and produce
6 a prosecution file for progression to the Public
7 Prosecution Service. This was the process put in place
8 by me after I joint the Security Team."

9 So this process required you to send an evidential
10 report to the PSNI; is that right?

11 **A.** Yes.

12 **Q.** Then they would consider it and discuss with you any
13 additional material required?

14 **A.** Yes.

15 **Q.** Did the investigation remain a Post Office
16 investigation, even after an evidential report had been
17 sent to the police?

18 **A.** Once I had handed it into the police, the police then
19 allocated the case to a police officer and then the
20 police officer would have liaised with myself regarding
21 any further information.

22 **Q.** But, in terms of ownership, did that become a police
23 investigation or did it remain a Post Office
24 investigation?

25 **A.** In a way, we both dealt with it. The police -- they

32

1 would have interviewed the person involved, as well.
 2 They then took it on as a police case. If they needed
 3 information or additional disclosure of what they
 4 wanted, they would have come back to me and asked for
 5 it.

6 **Q.** Was this, therefore, the police advising the Post Office
 7 on what steps they needed to take for the case to be
 8 ready for presentation to the prosecution decision
 9 maker?

10 **A.** Yes. The police looked through the file and, if they
 11 felt there was more information needed, or they guided
 12 me on how I should word certain documents, and how
 13 I should present the file, so as it was easily read by
 14 the Public Prosecution Service.

15 **Q.** You've referred to the police asking for additional
 16 material. Did the PSNI ever recommend that you follow
 17 further lines of inquiry?

18 **A.** Yes, they did.

19 **Q.** Can you recall what type of further inquiries the PSNI
 20 recommended you make?

21 **A.** With regard to -- for instance, we mentioned the Paid
 22 Order Unit in Lisahally, they advised me with cases
 23 involving the people -- you need statements from every
 24 person for continuity of evidence, you need to go to the
 25 beginning of the evidence and follow it through with

33

1 **Q.** Should we take the reference here to the Public
 2 Prosecution Service to be a reference to the DPP for the
 3 period pre the establishment of the PPS?

4 **A.** Yes.

5 **Q.** Who would produce the report for the DPP and later the
 6 PPS: you or the PSNI?

7 **A.** The PSNI would have looked at the information I had
 8 given and that would go to the DPP, as well as a report
 9 from the police, because I am just putting forward the
 10 information. The police then look at that information
 11 and then they put it forward to the Public Prosecution
 12 Service, and it is the Public Prosecution Service or the
 13 DPP that authorised any prosecutions.

14 **Q.** You say in the next line in this paragraph, after where
 15 we left off, after Security Team, that this process
 16 developed and changed over the years. Before we come on
 17 to the example you give here of a change to the process,
 18 I'd like to ask you, please, about a report of the Chief
 19 Inspector of Criminal Justice in Northern Ireland, from
 20 July 2008. Could we have this up on screen, please, the
 21 reference is POL00121607.

22 The quality of the front page is not terribly good
 23 but, if we turn to page 2 of this document, we can see
 24 the title more clearly, the title is "Royal Mail Group,
 25 An Inspection of the Royal Mail Group Crime

35

1 your statements. So, sometimes, there was quite a lot
 2 of statements you needed to take from the Paid Order
 3 Unit.

4 With regard to Fujitsu, they always asked for
 5 a statement from Fujitsu to say that the Horizon was
 6 completely reliable, as what we had always been told.

7 **Q.** We'll come on to liaison with Fujitsu in Northern
 8 Ireland in due course but, in a case where the Horizon
 9 system was showing a shortfall in a branch, do you
 10 recall the PSNI ever saying that further evidence or
 11 enquiries needed to be made to evidence an actual loss
 12 suffered by the Post Office?

13 **A.** I can't recall because you're trying to have all the
 14 evidence that you feel the police will need, but the
 15 police always asked for a statement. Because we were
 16 dealing with a computer, the police always said "You
 17 need to have a statement to say that this computer is
 18 working correctly and reliable".

19 I have to say whenever I first put my first
 20 prosecution and I requested this statement from Fujitsu,
 21 you have to go through the Casework Team and I can
 22 recall, I feel, that they didn't have such a statement,
 23 and it took me some time to get the statement through to
 24 say that Fujitsu were prepared to put all the
 25 information onto a statement.

34

1 Investigations Function", it is dated July 2008.

2 Turning over the page, please, and there's a blank
 3 page there, so one more page, please -- apologies, if we
 4 can go to page 6, we have here the "Chief Inspector's
 5 Foreword" and, scrolling down, please, this is signed by
 6 Kit Chivers, the Chief Inspector of Criminal Justice in
 7 Northern Ireland. There is a logo towards the bottom of
 8 the page, "Criminal Justice Inspection Northern Ireland,
 9 a better justice system for all"; can you help with what
 10 body this logo is referring to?

11 **A.** No.

12 **Q.** Does it follow that you can't assist with what its
 13 function was?

14 **A.** Well, the criminal justice system was an independent
 15 inspectorate in Northern Ireland of the justice system,
 16 and to ensure that all standards are 100 per cent.

17 **Q.** How does the Chief Inspector who wrote the foreword fit
 18 in with that?

19 **A.** Well, in Northern Ireland anything involved with the
 20 criminal system, they're always audited, and I think it
 21 was our time in Royal Mail and it was Royal Mail in
 22 Belfast -- I remember the inspection and it was Royal
 23 Mail Investigators, Post Office Limited Investigators,
 24 and we had to produce all our case files and any
 25 information that the Auditor wished to see to ensure

36

- 1 that we were meeting all the criteria that is needed to
2 involve criminal cases.
- 3 **Q.** Can we look, please, to page 15 of this document.
4 Paragraph 1.10 says this:
5 "RMG conducts its own English and Welsh prosecutions
6 according to the Code for Crown Prosecutors. In
7 Scotland completed investigation files are forwarded to
8 the Procurator Fiscal's office and in NI complete
9 investigation files are forwarded via the PSNI to the
10 Public Prosecution Service. At the time of inspection
11 fieldwork consultation with the PPS to enable RMG case
12 files to be submitted directly to them was under way.
13 A direct submission process would reduce the potential
14 for delay in processing files."
15 Do you recall there being a consultation with the
16 PPS about direct submission of cases by the relevant
17 investigation function within the Royal Mail Group and
18 the PPS?
- 19 **A.** Yes.
- 20 **Q.** Going, then, to page 25 of this document, which deals
21 specifically with Post Office Investigations. At
22 paragraph 4.6, please, this says:
23 "Typical cases dealt with by RML Investigators ..."
24 Is that Royal Mail Letters?
- 25 **A.** Yes.

37

- 1 RML cases."
2 So we can see a recommendation was being made
3 specifically for Post Office Investigations that cases
4 should be submitted more directly to the PPS. Was this
5 recommendation implemented following this report in July
6 2008?
- 7 **A.** Yes, yes it was.
- 8 **Q.** So this is a change to the process you set out in your
9 statement. Can you recall when it changed and how?
- 10 **A.** I think it took some time to bring in the changes and we
11 then got a local solicitor in Belfast who then took my
12 cases. Instead of them going directly to the police, my
13 cases were then given to this solicitor in Belfast who
14 then directed me in what -- if we needed any extra
15 evidence or if the file was correctly prepared and then
16 it went from the solicitor to the PPS or the DPP.
- 17 **Q.** Is that the example that you give in your witness
18 statement of a change to the process?
- 19 **A.** I think so. It was also a change within the police
20 around the same time, where there was a major change in
21 the police service in Northern Ireland and it meant that
22 it was best for me to just go to a solicitor rather than
23 get access in to the police.
- 24 **Q.** The next paragraph of the report, paragraph 4.7, says
25 this:

39

- 1 **Q.** "... included theft of post and criminal damage. The
2 POL Investigator typically dealt with offences committed
3 by PO employees against customer accounts. These
4 investigations had been more complex in nature and had
5 often involved elements of fraudulent behaviour or false
6 accounting. Because the offences had been committed in
7 Northern Ireland and were subject to different
8 submission processes and legislation, the RMG Criminal
9 Law Team had been unable to either provide advice nor
10 decide on prosecution regarding these cases. The POL
11 Investigator had access to advice regarding employment
12 legislation if required. For PO criminal cases in
13 [Northern Ireland] the internal prosecution decision
14 rests with the Head of Security. Files had then been
15 forwarded to the PSNI for onward transmission to the
16 PPS. As previously raised in the report this is
17 an overly complex submission system which increases the
18 risk of delay. It would be helpful if the cases
19 submitted in NI by the POL Investigator went through the
20 same, less complex process as recommended for Royal Mail
21 cases."
22 Then in bold:
23 "Inspectors recommend that to improve efficiency and
24 reduce the risk of delay, that Post Office Limited cases
25 are submitted by a more direct method as recommended for

38

- 1 "There was only one POL Investigator for [Northern
2 Ireland] but at the time of fieldwork two other
3 investigators based in England and Scotland were being
4 trained to deal with [Northern Ireland] cases to improve
5 resilience and to provide support. Inspectors found
6 that there was capacity within the existing RM
7 Investigators in [Northern Ireland] to provide support
8 and cover. There had been cases when the POL
9 Investigator had assisted with RML investigations and
10 this had been reciprocated informally."
11 Then in bold, the recommendation:
12 "To improve resilience and support Inspectors
13 recommend that RMG Security formalises a flexible
14 approach to investigations so that local investigative
15 staff can be shared across its business areas in
16 [Northern Ireland] in response to demand."
17 Were you the one Post Office Investigator being
18 referred to here?
- 19 **A.** Yes.
- 20 **Q.** How long had that been the case?
- 21 **A.** How long had I been the one Post Office Investigator?
- 22 **Q.** So you'd referred to yourself as being a one-person
23 department before, we know you had input from your line
24 manager, Mr Thorpe, but is it right that you were not
25 only a one-person department but you were the only

40

1 investigator in Northern Ireland for Post Office cases?
 2 **A.** Yes, I was the only person that investigated. There was
 3 another person that looked after the physical side, the
 4 physical security side, which would have been robberies,
 5 burglaries, and then, whenever they left, there was
 6 literally just me and I did all of the Security work.
 7 And then a few years before I left, an additional person
 8 was brought in to deal with the physical side but I was
 9 the main Investigator.
 10 **Q.** At the point in time when Mr Thorpe was your line
 11 manager, where was he based?
 12 **A.** I think Mr Thorpe -- well, he was based in England. I'm
 13 not sure whereabouts but it was in England.
 14 **Q.** How many cases were you dealing with at any one time on
 15 average?
 16 **A.** It's difficult to say on average. It just depended how
 17 the work came in. Sometimes you may have had just five
 18 cases, another time you could have had 12 cases. It
 19 just depended on what was actually happening.
 20 **Q.** Until the point where an additional person was provided,
 21 did you feel adequately supported in your role, being
 22 the only Investigator?
 23 **A.** Yes, I did, because Northern Ireland, to help you
 24 understand, Northern Ireland was completely different to
 25 the way everything worked in England. In Northern
 41

1 Fujitsu. Could we have on screen, please, paragraph 34
 2 of Ms Winter's statement. It is page 19.
 3 Do you say at paragraph 34, scrolling down a bit,
 4 please:
 5 "When I held the position of Investigator/Fraud Risk
 6 Manager within the Security Team and any SPM/SPMs
 7 manager(s) or assistant(s)/Crown Office employees(s)
 8 attributed any discrepancy to the Horizon system,
 9 I would have asked them to give details of the problems
 10 and if the matter had been reported to the Helpdesk or
 11 their Area Manager. The matter would be raised with my
 12 line manager and Casework Manager and a decision would
 13 be made to request Horizon data to be reviewed for the
 14 period in question. From my recall Horizon transactions
 15 could be viewed on Credence but only a few months.
 16 An ARQ needed to be authorised if you needed to view
 17 further back than this."
 18 Pausing there, you pick up the question of when ARQ
 19 data was requested in the following paragraph over the
 20 page, that's paragraph 35. Here you say this:
 21 "I cannot recall for definite if an ARQ data was
 22 requested every time an SPM was attributing a shortfall
 23 to problems with Horizon. Horizon transactions could be
 24 viewed on Credence. If a case was going to progress for
 25 prosecution an ARQ was requested. There was only
 43

1 Ireland, everybody that's involved that would speak to
 2 requiring information regarding a criminal
 3 investigation, I worked with on a daily basis. I had
 4 face-to-face contact with them. So I felt I had all the
 5 information right beside me on hand, without maybe
 6 having to go looking for any information. I worked in
 7 the same office as the Audit Team, the Contracts
 8 Manager, the Retail Line Manager. I had contact with
 9 the cash remittance department, put -- Royal Mail
 10 Letters was down the corridor. So it was a totally
 11 different set-up as what was in England.
 12 **MS PRICE:** Sir, I've reached the end of a topic. Would that
 13 be a convenient time for a morning break?
 14 **SIR WYN WILLIAMS:** Certainly, yes, what time should we
 15 resume?
 16 **MS PRICE:** It's 11.40 now, if we could come back at 11.55,
 17 please, sir.
 18 **SIR WYN WILLIAMS:** Certainly, thank you.
 19 (11.40 am)
 20 (A short break)
 21 (11.55 am)
 22 **MS PRICE:** Hello, sir, can you see and hear us?
 23 **SIR WYN WILLIAMS:** Yes, thank you, yes.
 24 **MS PRICE:** I'd like to move, please, Ms Winter, to the
 25 circumstances in which audit data was requested from
 42

1 a certain number allowed to be requested each month from
 2 Fujitsu and you might have to wait until the following
 3 month."
 4 Whose decision was it whether or not to request ARQ
 5 data: the Investigator's or that of their line manager
 6 or Casework Team?
 7 **A.** I think it would have been more the Casework Team or the
 8 line manager but, usually, everything went through the
 9 Casework Team.
 10 **Q.** So are you saying it was not the Investigator's decision
 11 to make?
 12 **A.** I would request it. Quite often I would have requested
 13 information. Just to explain a little bit, at the start
 14 of my time as an Investigator, I don't think there was
 15 certain information available from Fujitsu or I wasn't
 16 aware of it, and then I realised there was Credence, and
 17 Credence would be -- I could go on to my computer and
 18 look and see what any particular post office in the
 19 United Kingdom was doing or working at. But if you
 20 wanted to use any information on Credence, you needed
 21 an ARQ for a witness statement or for court. You
 22 couldn't use information from Credence.
 23 So if I wanted to use Credence, I could just go on
 24 that myself, but if you want an ARQ, you had to go
 25 through casework, you didn't do it -- you didn't deal
 44

1 directly with Fujitsu and we were only allowed a certain
2 amount of ARQs every month.

3 **Q.** Are you saying in your evidence at paragraphs 34 and 35,
4 the parts we've just looked at, that ARQ data was not
5 sought in every case where someone being investigated
6 was attributing a discrepancy to the Horizon system?

7 **A.** No, the ARQ would have been requested. You may have had
8 to wait until the following month but, if it was going
9 to be an actual investigation, you would want the ARQ
10 information.

11 **Q.** Well, you've said at paragraph 35 here "I cannot recall
12 for definite if an ARQ data was requested every time
13 a subpostmaster was attributing a shortfall to problems
14 with Horizon"; so are you now saying that you can
15 recall?

16 **A.** No, with my cases, my own cases, I cannot remember or
17 recall. But that is what you would want to do.

18 **Q.** Because you'd want to obtain the best data you could
19 get, wouldn't you, for each and every one of those
20 cases, if someone was attributing a shortfall to
21 problems with Horizon?

22 **A.** Absolutely.

23 **Q.** You referred in your statement to there only being
24 a certain number of allowed requests from Fujitsu per
25 month and you've just touched on that now. Did you mean

45

1 police or the PPS and they had decided we need some more
2 information, then I would have requested it then, and
3 that's whenever you could have had a push. But if I was
4 doing an investigation before it had even got to the
5 police, I want to satisfy myself exactly what had been
6 happening on the system. I would request an ARQ before
7 it had even got to the police stage.

8 **Q.** Could we have on screen, please, paragraph 29 of this
9 statement, it's page 17. You say here:

10 "With regard to Fujitsu, I cannot recall if data
11 would be requested in all cases of cash shortfalls as we
12 had been assured by Fujitsu that the Horizon system was
13 completely reliable. These assurances were given from
14 Senior Managers at meetings and during Horizon
15 training."

16 The Horizon training we covered earlier and my
17 question to you then was whether anyone from Fujitsu was
18 sending that message. But, just to be clear, the
19 Horizon training you're talking about here, is that that
20 initial Horizon training or was that a message that was
21 repeated at future training sessions you attended?

22 **A.** It was a message that was repeated constantly.

23 **Q.** How was that message repeated constantly?

24 **A.** If you were over at conference or perhaps where there
25 was large team meetings, Senior Managers would have been

47

1 by that there were only a certain number of allowed
2 requests for which Post Office was not charged?

3 **A.** I'm not sure. I don't know about the charges. We were
4 just told you can have only a certain amount of requests
5 in the month. If they had reached that peak, then you
6 would have to wait possibly the next month but, quite
7 often, you were always pushing because it delayed your
8 case.

9 **Q.** Were you ever told you couldn't have it, as opposed to
10 needing to wait until the next month, because of the cap
11 or limit on the numbers of requests allowed?

12 **A.** No, I was never told I couldn't have it. You may have
13 had to wait but, again, I would have been pushing
14 because I would have had perhaps the police pushing me,
15 or the Public Prosecution Office pushing me. So you did
16 your best and, quite often, they were good and maybe
17 acceded and said, "Right, I'll get that for you". But
18 on the odd occasion you'd have had to wait if you'd
19 reached that limit for the month.

20 **Q.** Are you referring now to what happened once a decision
21 had been made that the case was going to progress for
22 prosecution? You've just referred to requests from the
23 police and the PPS.

24 **A.** I'd have -- I would have requested ARQs even before it
25 went to prosecution but, if it had now reached the

46

1 saying about -- maybe something about Fujitsu and how
2 the system would be reliable. Whenever you went with --
3 even the Horizon trainers would have been told the
4 system is 100 per cent reliable.

5 **Q.** Which --

6 **A.** Sorry, the Post Office emphasised -- I'm just -- it's --
7 as you start to talk about something, you start to
8 recall. The Post Office always emphasised Fujitsu said
9 that the system was reliable.

10 **Q.** Which Senior Managers gave you assurances that the
11 Horizon system was completely reliable?

12 **A.** I'm sorry, I can't put names but it would have been --
13 it would have been higher up whenever you were at
14 conference. They would have had maybe Security -- the
15 Head of Security on speaking and maybe other Executives,
16 and that -- this is where it would come from. It would
17 come from upper level.

18 **Q.** Can you remember who any of those other Executives were?

19 **A.** I would say I would only be guessing because my last
20 Security Manager was John Scott and he was Head of
21 Security. I vaguely remember maybe somebody from
22 Fujitsu giving us a talk at one of our conferences and
23 saying again that the computer system was reliable.

24 **Q.** Looking back at the wording of the first two sentences
25 of paragraph 29 that we've just looked at, are you

48

1 saying here that the assurances given to you about the
2 complete reliability of the Horizon system had a direct
3 impact on the decision making on whether or not to
4 obtain ARQ data in cash shortfall cases?

5 **A.** Sorry, I'm going to ask you to repeat that again,
6 please.

7 **Q.** So we can re-read them, the first two sentences at 29.
8 You say:

9 "With regard to Fujitsu I cannot recall if data
10 would be requested in all cases of cash shortfalls as we
11 had been assured by Fujitsu that the Horizon system was
12 completely reliable."

13 So just that first sentence there, you seem to be
14 linking the request for data and the decision as to
15 whether that would happen to the assurance given by
16 Fujitsu that the Horizon system was completely reliable.
17 So I am asking whether this had a direct impact, these
18 assurances, on the decision making, on whether or not to
19 obtain ARQ data in cash shortfall cases?

20 **A.** I would say it did because they were assuring us that
21 this computer system was reliable. But assurances were
22 all well and good until you're actually taking
23 a prosecution. And, there again, I have to say this is
24 where in Northern Ireland we asked for a statement from
25 Fujitsu to say that this system was completely reliable.

49

1 **A.** No.

2 **Q.** How would an agent or an employee of the Post Office be
3 expected to explain or prove that they had not stolen or
4 caused the loss?

5 **A.** Well, this particular paragraph that you've raised, this
6 was in answer to the two cases that I have been involved
7 in.

8 **Q.** Well, this is under a heading of "General", in response
9 to a question about the relevance of a challenge to the
10 integrity of the Horizon system in one case to other
11 ongoing or future cases. You do make reference earlier
12 on in this paragraph to the two cases, which we'll come
13 on to, of Alan McLaughlin and Maureen McKelvey but this
14 sentence here seems to relate to your understanding now
15 as to what was possible in terms of errors on the system
16 and I'm asking you if this reflects a presumption of
17 dishonesty and an expectation that a subpostmaster would
18 have to explain where there was a concern, as you put
19 it.

20 **A.** Yes, it would depend on what the discrepancies were,
21 yes, they would have to explain. With regard to the
22 Horizon system, what I know now, I most likely would
23 have acted in a different way then but, yes, you're
24 wanting to go down all avenues of concern and you would
25 be asking the subpostmaster to explain, if they can

51

1 So, yes, there was times, depending on the
2 shortfall, depending on the investigation, that you may
3 have not got that information from Fujitsu. It would
4 depend --

5 **Q.** Could we have on screen, please -- I'm sorry,
6 I interrupted.

7 **A.** That's okay. It would depend on the case that you're
8 dealing with.

9 **Q.** If we could have on screen, please, paragraph 71 of
10 Ms Winter's statement. That's page 37. In this
11 paragraph you address the relevance of a challenge to
12 the integrity of the Horizon system in one case to other
13 ongoing or future cases. Going over the page, please,
14 seven lines down, you say:

15 "I understand now that if Horizon recorded
16 a different transaction to the one the SPM entered then
17 this could cause an error but if there was a consistent
18 pattern and none of the patterns showed that there was
19 an underpayment and so the cash showed an excess then it
20 causes a concern. The concern and error did not prove
21 illegal activity but the SPM would need to provide
22 an explanation."

23 When you were an Investigator, was there
24 a presumption of dishonesty where the loss could not be
25 explained?

50

1 offer an explanation for any underpayment or excess.
2 I'm sorry, that's the only way I can sort of explain it
3 to you.

4 **Q.** Do you recognise, looking at the wording you have used
5 here, that this logic is the wrong way round: you are
6 expecting someone who had experienced a shortfall to
7 prove that they have not stolen the money or caused the
8 loss, rather than the question being: could an actual
9 loss be proved?

10 **A.** No, I don't see that. I'm sorry.

11 **Q.** You say at paragraph 36 of your statement that you do
12 not recall if the ARQ data was provided to the SPM as
13 a matter of course. You say this would be a decision
14 made by the PPS. This would, of course, rely on that
15 data having been provided to them, wouldn't it?

16 **A.** Sorry, repeat the question, please?

17 **Q.** Well, we can go back and have a look at the paragraph,
18 if you'd like. It's paragraph 36, page 20, please. So
19 you're dealing here with the situation where ARQ data
20 has been obtained from Fujitsu. You say:

21 "I do not recall if the ARQ data was provided to the
22 SPM as a matter of course. This would be a decision
23 made by the PPS."

24 **A.** Yes. If the case had gone to the PPS, they would
25 usually advise for that data to be produced.

52

1 Q. But in a situation where you said you sometimes obtained
 2 ARQ data before that point in time, so assuming you've
 3 obtained it in your investigation, before you are
 4 referring the case to the PPS, in that situation, the
 5 PPS can only make a decision as to disclosure or not of
 6 the ARQ data if it's provided to them; that's right,
 7 isn't it?
 8 A. That's right.
 9 Q. What did you typically include in your evidential report
 10 sent to the PSNI?
 11 A. There would have been -- you include everything,
 12 whenever you go to the police. You have -- you would
 13 have notebook entries, you would have any evidence that
 14 you have regarding branch trading statements, cash
 15 declarations, all of your investigative notes, you would
 16 have anything to do with the sub post office, how they
 17 had claimed any over reaches or shortages.
 18 You would have contacted the cash remittance people
 19 to see what money was delivered to the office; you'd
 20 have looked at calls to the Helpdesk, calls to Horizon;
 21 you'd have looked at past records; you'd have spoken
 22 with Contracts Manager to see if there had been any
 23 issues with the office; you would have asked the Retail
 24 Line if they'd had any issues with the office; you'd
 25 have looked at previous audit reports to see how the

53

1 Office. They then sat with me again and we would have
 2 had meetings with them and with their lawyers and
 3 discussed the case, and then they would have advised me
 4 if there was sufficient evidence or if they required
 5 more evidence.
 6 If they did, then we got the evidence that they
 7 required and, again, further meetings before any
 8 decision was made by the Public Prosecution Office.
 9 Q. Where ARQ data was obtained, as part of your
 10 investigation, was it provided as a matter of course to
 11 the PSNI and the PPS?
 12 A. Yes, because it was the police that said "We need
 13 evidence from the people that own the computer system
 14 that it is reliable". So, yes, if it was available at
 15 that time.
 16 Q. Where it was provided to the PSNI or the PPS, were they
 17 provided with any information as to how to interpret the
 18 data?
 19 A. That would have been with, I would have said, the
 20 statement from Fujitsu.
 21 Q. Could we have back on screen, please, paragraph 29 of
 22 Ms Winter's statement, that's page 17. Starting four
 23 lines down, you say:
 24 "I did not get involved with Fujitsu until working
 25 in the business for a number of years when we were

55

1 office had been running.
 2 So all that information would have been within your
 3 file to the police.
 4 Q. Were there guidelines or a checklist to assist you in
 5 preparing the evidential report?
 6 A. Yes, there was guidelines on how you had to prepare the
 7 evidential report so that it was easily understood by
 8 whoever was receiving it because Post Office was
 9 a complex business.
 10 Q. How did you ensure that the PSNI and, ultimately, the
 11 PPS were provided with all available evidence, including
 12 any evidence relating to possible explanations which
 13 pointed away from the guilt of the suspect?
 14 A. I would have had telephone conversations with the police
 15 beforehand and then, whenever -- the file had to be hand
 16 delivered to the police and the Inspector would have
 17 gone through it with me. We would have discussed the
 18 whole case and then we would have looked at the
 19 evidence, and he would have advised me, "You need
 20 further evidence" or "You have sufficient evidence".
 21 If he'd said, "You need further evidence", then
 22 I would have went and got the further evidence, and
 23 brought it to the police. Once the police were
 24 satisfied that there was sufficient evidence to put to
 25 the DPP or the PPS, then it went to the Prosecution

54

1 informed we had to produce an expert witness statement
 2 from Fujitsu in investigations. The decision to get
 3 expert reports was not made by me and I cannot recall
 4 who first advised me that I should get a report.
 5 I recall there were protocols to follow should you
 6 require their assistance and Horizon data would not
 7 always be requested if admissions had been made.
 8 I found the Fujitsu evidence statements hard to follow
 9 as they often had a lot of technical detail in them."
 10 When were you told that an expert witness statement
 11 from Fujitsu had to be produced in investigations; can
 12 you recall?
 13 A. I think it was a number of years within -- and it was
 14 whenever I was preparing a prosecution file, and it
 15 was -- the police and I had a discussion about the
 16 computer system and it was the police that said "We need
 17 to have a statement from Fujitsu".
 18 Q. Was this in relation to all investigations where Horizon
 19 data was being relied upon?
 20 A. If Horizon -- if Horizon data was being relied upon,
 21 yes.
 22 Q. Did you understand what the purpose of such a report
 23 was?
 24 A. Yes.
 25 Q. What was the purpose?

56

1 A. Well, the purpose of this report from Fujitsu was for
 2 them to state that the Horizon computer was reliable,
 3 and was not at fault.
 4 Q. You referred to protocols to follow should you require
 5 Fujitsu's assistance. Can you recall what those
 6 protocols were?
 7 A. Well, we did not have access to anyone in Fujitsu or
 8 allowed to have access. I had to put my requests
 9 through Casework if I wanted anything from Fujitsu, and
 10 then, as far as I am aware, Casework then dealt with
 11 that. About maybe nine years in, our Casework Team then
 12 got a Fujitsu liaison person, and that is the person
 13 that we would deal with then, if we wanted anything from
 14 Fujitsu, if I wanted statements. I can't ever recall
 15 having direct contact with anyone in Fujitsu. Maybe on
 16 an odd occasion, whenever they were required to give me
 17 a statement and it hadn't be forthcoming, or to arrange
 18 for them to come to a court case.
 19 Q. You refer to the Fujitsu statements as being "hard to
 20 follow". Which parts of the statements did you find
 21 hard to follow; can you recall?
 22 A. I remember there were statements -- they were quite
 23 lengthy. Now, this is by recall, as I say, it's quite
 24 number of years ago. But I do remember looking at one
 25 of the statements, and there was one time there was

1 A. Well, as we discussed earlier, you need to disclose
 2 everything that you have, and it would stand to reason,
 3 whenever you're investigating, you have to look at
 4 everything and, if there was any possibility that there
 5 was something wrong with the computer, that would need
 6 to be disclosed, and this is where I was happy working
 7 with the police, and the Public Prosecution Service
 8 because they knew what you needed to make sure your
 9 case, you had investigated everything, and disclosed
 10 everything that we had.
 11 We could not disclose that there was anything wrong
 12 with the computer because that was not what we had been
 13 told and I understood why the police needed a statement
 14 to say that the computer was reliable.
 15 Q. You say in paragraph 29, in the penultimate line, that
 16 if admissions had been made, then Horizon data would not
 17 always be requested. Why was that?
 18 A. I'm not sure.
 19 Q. Was that the assumption that there was no need to
 20 investigate further because an admission had been made?
 21 A. It may have been. I'm sorry, I'm not sure why.
 22 Q. You refer at paragraph 37 of your statement to there
 23 being an expert witness from Fujitsu who provided
 24 a detailed witness statement when prosecution cases were
 25 progressing through the court. Is that the expert

1 statements came regarding the ARQs and then I do believe
 2 there was another, a further statement was required,
 3 more intricate, into the system and it was that one that
 4 I'm referring to but that's all I can remember, except
 5 I do remember it was a man that had made the statement
 6 and I think he had to come to one of my prosecution
 7 cases at court.
 8 Q. Since the statements related to your investigations, did
 9 you ever seek clarification in respect of the bits which
 10 you found hard to follow?
 11 A. No.
 12 Q. Why not?
 13 A. Because it seemed to be that the technical side -- they
 14 were being reported as the expert of the computer and
 15 you were, more or less -- in the Post Office, where we
 16 were -- if you challenged anything -- you didn't feel
 17 you could challenge anything, that's what I would say.
 18 Q. Was there any particular individual or individuals who
 19 made that the case?
 20 A. No, I wouldn't say any particular individuals but you
 21 just got the impression that, if you started to
 22 challenge too much, it didn't go well.
 23 Q. Can you recall the reason behind the police request for
 24 a statement from Fujitsu, in cases where Horizon data
 25 was relied upon?

1 witness that you've just been referring to, ie the
 2 person who provided the statement required by the
 3 police?
 4 A. Yes.
 5 Q. You seem to be referring to one particular person here,
 6 you say you do not recall the name of this expert
 7 witness; is that right?
 8 A. Yes, I mean, I would have dealt with Penny Thomas and
 9 Andy Dunks in Fujitsu whenever information came through
 10 from Casework and, as I say, on the odd occasion, I may
 11 have had an email from them. They produced ARQs and
 12 they would have given statements regarding the ARQs and
 13 the information on them. But I do believe -- and it's
 14 just my recall from one of my cases -- there was someone
 15 different came and it was a more technical statement but
 16 I'm sorry, that's -- I just recall that but that's all
 17 I can say.
 18 Q. You say at paragraph 41 of your statement that this
 19 requirement, or this feature of an expert witness from
 20 Fujitsu, was an exception to the general observation you
 21 make that investigations in Northern Ireland were
 22 conducted in the same ways as the rest of the United
 23 Kingdom. What was it that was different about the use
 24 of an expert witness from Fujitsu in Northern Irish
 25 cases from the way investigations were carried out in

1 the rest of the UK?

2 **A.** Sorry, could you just bring that paragraph up, please?

3 **Q.** Of course. 41, it's page 21. So this is the paragraph

4 where you deal with the process by which cases were

5 investigated and prosecuted in Northern Ireland and how

6 they differed from that process in England and Wales.

7 In the context of that, you say:

8 "Investigation cases were conducted in the same ways

9 as the rest of the United Kingdom, except as mentioned

10 in paragraph 37."

11 If we can just pull up 37, please, it's page 20.

12 Towards the bottom, please, this is the paragraph in

13 which you refer to Andy Dunks and Penny Thomas' contacts

14 in Fujitsu and say:

15 "There was also an expert witness from Fujitsu who

16 provided a detailed witness statement when prosecution

17 cases were progressing through the court in Northern

18 Ireland."

19 So that seems to be you describing that being the

20 exception to investigations being conducted in the same

21 way throughout the UK.

22 **A.** I think that paragraph must be wrong then because that

23 wouldn't have been -- I'd have to go back to that

24 previous paragraph to see what it was but I think that's

25 the wrong paragraph I've quoted.

61

1 scribbles on paper or evidence. So we went through it

2 with -- the police and I together and then they would

3 have assisted with the disclosure.

4 **Q.** Was there any guidance or a checklist to ensure that,

5 once a case was proceeding to court, as opposed to that

6 earlier stage of you doing your evidential report, that

7 all relevant information was sent to the PSNI and/or the

8 PPS?

9 **A.** You could always take -- you could always look at

10 information on the Police and Criminal Evidence book or

11 there would have been guidance that I maybe had from the

12 police whenever we were first arranging the Memorandum

13 of Understanding.

14 **Q.** Who made decisions as to what material was disclosable

15 in a prosecution?

16 **A.** I think it ultimately would have been the Director of

17 Public Prosecutions because he would have received all

18 the information from the police. So that's who I would

19 have said, the police forwarded all my file to the

20 Public Prosecution, along with a report, because, once

21 my case went to the police, then they allocated a police

22 officer, and I would have liaised with that police

23 officer through the system until it went to court, and

24 then I would have met that police officer in court.

25 **Q.** If a case proceeded to court, would the evidence file be

63

1 **Q.** I see. Well, perhaps we can look at that over the lunch

2 break and try to establish which the right paragraph is.

3 I'd like to turn, please, to disclosure. You say at

4 paragraph 11 of your statement that, if a case

5 progressed to court, the PSNI and PSO would assist with

6 disclosure. Can you help with PSO? What did that stand

7 for.

8 **A.** That was Public -- Public Office, Public -- I must have

9 got it wrong. Public Office. It was the DPP. I always

10 worked with the PSNI and the DPP or the PSO.

11 **Q.** You say you were the Disclosure Officer in the cases of

12 Alan McLaughlin and Maureen McKelvey. Did you provide

13 to the PSNI and/or the PPS Schedules of Unused Material?

14 **A.** Yes.

15 **Q.** Did you provide them with disclosure reports?

16 **A.** Yes.

17 **Q.** Were they documents that you completed as Disclosure

18 Officer?

19 **A.** Yes, they would have been.

20 **Q.** What did you understand to be required to include on

21 those documents?

22 **A.** With disclosure, you disclosed everything that you had,

23 everything that you were aware of, and I would have went

24 through the disclosure with the police and, for

25 instance, if you had notebook entries or if you just had

62

1 provided to the police in full: in essence, your entire

2 file on the case?

3 **A.** My entire file was produced to the police because it

4 could be quite extensive.

5 **Q.** Was the entire evidence file then provided to the

6 defence in that prosecution; can you recall?

7 **A.** I wouldn't have had involvement with that. That would

8 have then been with the Public Prosecution Office. I do

9 know that, for my file, I had just four copies and the

10 four copies were given to the police for them to

11 distribute wherever they had to distribute.

12 **Q.** Was Credence data obtained when gathering evidence and

13 included in disclosure in cases against subpostmasters,

14 their staff and Post Office employees?

15 **A.** Yes, Credence, if you had any Credence data, you would

16 disclose that but you would have to say that, if you

17 needed further disclosure for court, you needed to get

18 an ARQ and a statement.

19 **Q.** Credence data only went back a limited period of time,

20 didn't it? So if it hadn't been obtained in the initial

21 investigation, you wouldn't later be able to obtain it

22 at the point of it going to court, would you?

23 **A.** That's right. But you'd have to be able to show that

24 you'd looked at that information. So you're wanting to

25 disclose all your material.

64

1 Q. I'd like to turn, please, to your involvement in the
2 investigation and prosecution of Alan McLaughlin. To
3 help with your memory of the case, Alan McLaughlin was
4 the postmaster at Brookfield branch, Belfast, between
5 1999 and 2001. He was prosecuted for 15 offences of
6 false accounting, contrary to section 17.1(a) of the
7 Theft Act Northern Ireland 1969. The offences were said
8 to have occurred between 13 December 2000 and the
9 26 July 2000.

10 He initially contested the charges but, ultimately,
11 pleaded guilty on the 16 February 2005 and was fined
12 £700. He was also ordered to pay compensation in the
13 sum of £1,300 and, after conviction, he lost his
14 business and was made bankrupt. You were the Lead
15 Investigator in Mr McLaughlin's case; is that right?

16 A. Yes.

17 Q. I'd like to start, please, with the interview you
18 conducted with the assistance of Mr Thorpe, your line
19 manager, on 26 July 2001. Could we have on screen,
20 please, AMCL000032. It's page 94 of that document,
21 please. We can see here that the interview was with
22 Alan McLaughlin. You were the lead interviewer and
23 Frederick Leslie Thorpe, that's Mr Thorpe, was the
24 second interviewer. The date of the interview there,
25 26 July 2001.

65

1 "Yeah, it would start, we got dreadful problems
2 balancing [because] of the problems with the capture
3 system and the change over to Horizon, things were very
4 see-saw, very up and down, you know. Erm ...

5 "Question: Where did you (*inaudible*).

6 "Answer: It wasn't stable at all ..."

7 Do you accept that this was a reference to
8 significant problems balancing when Horizon was first
9 introduced?

10 A. Yes, I think Mr McLaughlin was talking there at first
11 about the capture system, which I think was there before
12 Horizon, and then whenever the Horizon system went in,
13 he had problems with it and that was two years ago, from
14 the interview.

15 Q. So we can see that there:

16 "Question: When did you go onto Horizon?

17 "Answer: In September of '99, and it wasn't stable,
18 the balance were not stable at all."

19 That's the point that you then make:

20 "That's 2 years ago."

21 Going then to page 166, please, at 19.18, you ask
22 this:

23 "It should, it doesn't explain how for last night
24 for instance there's 3 accounts were then, put through
25 the system.

67

1 Going, please, to page 154 of this larger document.

2 At this stage of the interview, you were putting to
3 Mr McLaughlin apparent discrepancies relating to pension
4 payments shown by two documents: the computer adlist and
5 the weekly summary sheet; is that right?

6 A. That's right.

7 Q. Do you agree that both of these were automated documents
8 created by the Horizon system?

9 A. It was the information -- the person that was doing it
10 would be checking off actual foils and keying in the
11 information into the system.

12 Q. These documents, the weekly summary sheet and the
13 computer adlist, those were things generated by the
14 computer; is that right?

15 A. The adlist was generated by the person entering the
16 information and then the summary sheet was generated by
17 the computer system.

18 Q. Okay. Towards the bottom of the page, you suggested
19 that Mr McLaughlin appeared to be balancing. So you
20 say:

21 "And what made it interesting was that you always
22 seemed to be balancing."

23 Then in response he referred back to problems
24 balancing when the Horizon system was first introduced,
25 and we see by "AM", three lines down:

66

1 "Answer: Again it's personal time, trying to get
2 the balance on, trying to get it you know done by
3 a certain time in a way [because] when I was first here
4 you know and they were all over the place, we were
5 8 o'clock, 9 o'clock at night, yeah."

6 So Mr McLaughlin refers again to problems balancing,
7 doesn't he?

8 A. Yes, he does. I can understand.

9 Q. Going, please, to page 168. On this page, there is
10 discussion of accounting errors made in branch which
11 Mr McLaughlin was upfront about and was discussing with
12 you here, is that right?

13 Just take a moment to cast your eye down the page?

14 A. Yes, uh-huh.

15 Q. Then over the page to 169, there is a discussion of
16 shortages and what Mr McLaughlin did in response to
17 those shortages, starting four lines down:

18 "Where the, the pattern has been established and
19 develop and evolved that has certainly lead to situation
20 where um as you say, that accounts figure is not what it
21 should have been."

22 Mr Thorpe, it seems, says:

23 "Right okay, so you've had some big shortage you
24 become.

25 "Answer: Yeah.

68

1 "Question: Accounting errors.
 2 "Answer: Big, big shortages yep.
 3 "Question: And for that reason with a little bit of
 4 manipulation here to (*inaudible*) the surpluses to make
 5 good the shortages?
 6 "Answer: Well, it's a pattern you know and.
 7 "Question: So [that's that].
 8 "Answer: When people start ...
 9 "Question: That's what happened?
 10 "Answer: Presumably, presume yep, when people, when
 11 that happens someone starts working to ... paranoid or
 12 whatever and it works.
 13 "Question: Yeah.
 14 "Answer: You think oh fine, that's balancing and
 15 all the rest of it, but stores up, a bit stupid really
 16 it stores up problems and you know is not accurate
 17 accounting."
 18 Then at page 181 at the top, please, so a question
 19 from Mr Thorpe at the top, which is:
 20 "Which was the figure we just carried in your cash
 21 account. So why did you adjust it by £660?
 22 "Answer: Obviously to make the cash account show
 23 a reasonable balance. If that was the amount over that
 24 must have been the adjustment."
 25 So Mr McLaughlin accepts adjusting the figures to

69

1 So Mr McLaughlin here was saying that this is what
 2 postmasters do to get a continuum of acceptable accounts
 3 where there are wild variations. Would you accept that
 4 that's what he's saying?
 5 A. Yes.
 6 Q. Then going, please, to page 202. The second line down,
 7 you ask this:
 8 "And you were aware that this was a criminal offence
 9 because it was falsifying accounts?
 10 "Answer: I wasn't that -- I never thought about
 11 that or erm put it in those terms at all. No
 12 I wasn't -- as aware of that, I [wasn't] as aware of
 13 that ...
 14 "Question: You were aware that it was wrong to do
 15 that?
 16 "Answer: (sighs) I was aware that erm what
 17 I thought was if not unaccepted but a common practice to
 18 keep reasonable accounts ... was in danger of carrying
 19 a pattern which could not be understood or explained in
 20 terms of the original motivation for it.
 21 "Question: So you were, you were aware that you
 22 were falsifying your accounts?
 23 "Answer: Not -- I wouldn't have set out to do that
 24 in that form or, or, or with that intention or plan but
 25 ... as it were that by allowing this kind of pattern to

71

1 make the accounts balance, doesn't he, at this stage?
 2 A. Yes.
 3 Q. Then going, please, to page 196. The allegation of
 4 false accounting is put to Mr McLaughlin:
 5 "So that is a false account which is for you to
 6 submit this to the Post Office.
 7 "Answer: Hmm."
 8 Mr Thorpe says:
 9 "Is actually a criminal offence. And ...
 10 "Answer: ... sorry.
 11 "Question: No, no, it's ... this pattern as you've
 12 said has been going on regularly since perhaps
 13 January-February of the current year ...
 14 "Answer: Yeah. In -- when I found out that, you
 15 know, what er procedure ... what the postmasters were
 16 actually doing wasn't, because obviously we've had
 17 (sighs) wildly variation cash accounts for a period but
 18 whenever I found that what they would do would be, they
 19 would take the money, hold it, put it in, or keep it
 20 aside as according to what indication they were getting
 21 of where their cash account was going. I mean that is
 22 what I in my unclear way erm it's always been well this
 23 is the practice and everyone's doing it so it must be
 24 what you do to establish a continuum of ... acceptable
 25 accounts."

70

1 go on the, the, the final accounting probably would not
 2 be completely accurate.
 3 "Question: And the reason you have been falsifying
 4 the accounts ... was because of shortages?
 5 "Answer: Any overages which resulted from those
 6 cash accounts were used for any shortages which resulted
 7 [because] we had a lot of problems with staff at
 8 a particular point, which, timing of which coincides
 9 with this, this pattern. I had a lot of problems with
 10 my erm ... figures in the office. These were two staff,
 11 they were both dismissed.
 12 "Question: And I just want to clarify with you, did
 13 you keep a record anywhere of the discrepancies that you
 14 were making?
 15 "Answer: Not that I know ..."
 16 So Mr McLaughlin was denying any criminality in his
 17 interview, wasn't he?
 18 A. He was.
 19 Q. He gave a number of possible reasons in interview for
 20 discrepancies arising, including accounting errors, but
 21 he also clearly raised balancing issues caused by the
 22 Horizon system, didn't he, looking at those sections
 23 we've just been through?
 24 A. No, I'm not sure about that.
 25 Q. Why do you think not?

72

1 A. Just looking at those sections is really just looking at
 2 that part of the interview. It's not telling the whole
 3 picture.
 4 Q. We will come on in due course to the question of whether
 5 data was requested from Fujitsu after Mr McLaughlin's
 6 interview but, in terms of other enquiries, did you make
 7 any enquiries at the time of any colleagues or seniors
 8 as to whether other postmasters were experiencing or had
 9 experienced balancing difficulties because of the
 10 Horizon system?
 11 A. No, because, at that time, I think that was in 2001,
 12 there had never been any question of computer problems
 13 within the Horizon system.
 14 Q. But just taking that first example, going back to when
 15 Horizon first came in in Mr McLaughlin's branch and he
 16 was saying balancing was all over the place, did that
 17 not cause you any concern? Even if you thought it
 18 wasn't of particular relevance for your case, two years
 19 later?
 20 A. No, because it was two years down the road and, during
 21 the interview, I think he did say that he got to do the
 22 balancing okay, after a while, that that was at the
 23 beginning. I think he said the balancing was okay.
 24 But, also, I do not know or recall if the information
 25 would have been available at that time because it was

1 were being told there was no concerns with the computer
 2 system. We did know -- I wasn't on the investigation at
 3 the time of Horizon going in but we had heard that there
 4 was trial periods where there was some glitches, as they
 5 were put, but that that had all been ironed out and
 6 sorted out. Also, maybe it could have been the person
 7 operating the system so, no, I don't think I'd have
 8 raised many concerns because of what I had been told by
 9 senior management regarding Fujitsu.
 10 Q. Given what Mr McLaughlin had told you about balancing
 11 issues, not just at the beginning but the other
 12 references he made to balancing issues, more broadly,
 13 did you think to contact the helpline to see whether
 14 Mr McLaughlin had raised any issues about the system in
 15 the past?
 16 A. We would have gone -- I would have contacted the
 17 helpline. I would have contacted -- I would have spoke,
 18 actually, with the Casework Management Team and asked
 19 them for points of contact to see any information on
 20 this particular post office.
 21 Q. Could we have on screen, please, page 26 of Ms Winter's
 22 statement. The paragraph at the top of page 26, this is
 23 a continuation of paragraph 50 from the previous page
 24 and, in the last six lines here, you say this -- so this
 25 is in the reference of the line before referring to the

1 2001. I wasn't aware of it at that time, of information
 2 being available from Fujitsu.
 3 Q. Well, just staying on the point I asked you about in
 4 terms of enquiries of colleagues or seniors, someone had
 5 told you that, after Horizon was introduced, balancing
 6 was all over the place, it wasn't stable. Was that
 7 something you thought important enough to discuss with
 8 other colleagues?
 9 A. As it had been two years ago, I'm not sure. I can't
 10 recall. But I do know I would have been looking at
 11 audit reports and information from his Retail Line
 12 Manager, who would have been visiting the office to see
 13 if there had been any reports. I would have been
 14 looking at -- if there was any call logs available,
 15 I would have been asking more general knowledge from the
 16 people coming in to the office; I would have been asking
 17 them is there any problem with this particular office?
 18 Q. Okay, but setting aside Mr McLaughlin's case for
 19 a second, was it not a concern that the system was
 20 capable of causing balancing problems, regardless of
 21 whether they were operating in this case?
 22 A. Yes, it was a concern.
 23 Q. So did you say that it was a concern to anyone else?
 24 A. It would have been sort of -- I don't know if I actually
 25 would have put it out that it was a concern because we

1 interview with Mr McLaughlin.
 2 You say -- well, actually, let's read that whole
 3 section together. You say:
 4 "During the interview with Mr McLaughlin he
 5 mentioned having difficulty in processing certain
 6 documents which I understood were inputting errors. He
 7 also stated he had had counter losses and staff
 8 dishonesty but as I had always been assured there wasn't
 9 any problem with the Horizon system with regard to cash
 10 discrepancies I did not consider the counter losses to
 11 be attributed to the Horizon system. I do not recall
 12 Mr McLaughlin suggesting any direct issue with Horizon
 13 that would cause cash discrepancies or suggesting there
 14 was some error which could be attributed to Horizon."
 15 You may not recall it but, having looked at the
 16 interview transcript, would you agree that Mr McLaughlin
 17 had raised having had problems balancing because of the
 18 operation of the Horizon system in his interview?
 19 A. Whenever I read through the taped transcript again,
 20 Mr McLaughlin kept referring to a system and I believe
 21 it was the system that he was using to do his pension
 22 foils and not the system as in the Horizon computer
 23 system.
 24 Q. You appear to be saying here that, because of the
 25 assurances you had been given that Horizon was

- 1 completely reliable, you concluded that the counter
2 losses raised by Mr McLaughlin were not attributable to
3 Horizon; is that right?
- 4 **A.** No. What I'm saying is, whenever I was discussing with
5 Mr McLaughlin during interview, he was referring to
6 a system that he used for his pension foils and he
7 classed it as "the system". So sometimes whenever
8 you're reading through the tape transcript, you are
9 thinking that the system he is talking about is the
10 Horizon computer system, whereas it was the system that
11 he was using with the help of an ex-subpostmaster to
12 process the paid pension foils.
- 13 **Q.** Well, what you say here is:
14 "He had also stated he had had counter losses and
15 staff dishonesty but as I had always been assured there
16 wasn't any problem with the Horizon system with regard
17 to cash discrepancies I did not consider the counter
18 losses to be attributed to the Horizon system."
19 That's what you're saying here, isn't it?
- 20 **A.** Yes, that's right. I didn't consider the counter losses
21 to be attributed to the Horizon system, and --
- 22 **Q.** You're saying here, forgive me, that this was because
23 you were assured there wasn't any problem with the
24 Horizon system?
- 25 **A.** Yes.

77

- 1 losses were still surfacing in the business after July
2 2001 when the defendant ceased having any direct role in
3 it."
- 4 So Mr McLaughlin was placing unexplained losses in
5 his defence statement, wasn't he, by this paragraph?
- 6 **A.** This was the post office after he had left as
7 a postmaster?
- 8 **Q.** Yes. We'll come on to what he says happened in relation
9 to before but the reference there to "unexplained losses
10 were still surfacing in the business", that's on that
11 very first page. Then going, please, over the page.
12 The defendant's case is set out. So:
13 "The defendant accepts that he amended and altered
14 certain documents, as detailed in his interviews. The
15 full extent of the defendant's case is set out in his
16 interviews, the particulars of which can be referred to.
17 "However, the defendant denies that he amended and
18 altered the said documents dishonestly or that he was
19 motivated by dishonesty.
20 "He further denies that he was acting, whether as
21 alleged or at all, with a view to gain by himself or
22 another.
23 "Specifically, the defendant denies that he intended
24 to cause loss to another, or that such loss was caused
25 to another.

79

- 1 **Q.** Okay.
- 2 **MS PRICE:** Sir, it is 1.00. Is that a convenient moment to
3 take lunch? Sir, you're on mute.
- 4 **SIR WYN WILLIAMS:** *(The Chair gave a thumbs-up)*
- 5 **MS PRICE:** Yes, if we can come back at 2.00 then, sir.
6 Thank you.
7 **(1.00 pm)**
8 **(The Short Adjournment)**
9 **(2.00 pm)**
10 **MS PRICE:** Good afternoon, sir, can you see and hear us?
11 **SIR WYN WILLIAMS:** I can, thank you.
12 **MS PRICE:** Ms Winter, moving, please, to Mr McLaughlin's
13 defence statement. Could we have that on screen,
14 please. The reference is AMCL0000035. The first page
15 here is a covering letter from Mr McLaughlin's
16 solicitors dated 19 April 2004 and going to page 3 of
17 this document, please, we have the defence statement
18 itself.
19 We see the background set out, scrolling down
20 slowly, please, and then the section on
21 "Admissions/denials". At the bottom of the first page
22 we have this:
23 "It is understood that the post office business was
24 deemed no longer financially viable by February 2002.
25 It is also understood that significant and unexplained

78

- 1 "The defendant would say that his only intention was
2 to balance the accounts in the business and that his
3 actions were actuated by no improper motive.
4 "The defendant denies that he caused a loss to the
5 Post Office to the value of £10,288.47. He would say
6 that the charges in the indictment do not reflect this
7 value and this figure has been arrived at by taking all
8 of the input errors for the given period and attributing
9 them to the defendant. The defendant would say that
10 a large number of these identified transactions have not
11 been carried out by him. Further, these transaction
12 errors may have been rectified at a later stage.
13 "The defendant would say that the conduct alleged by
14 the Crown, the totality of which is not accepted in any
15 event, does not make out the 15 charges of false
16 accounting ... "
17 Going down, please.
18 Then we have "Points taken issue with". Before we
19 turn to that, it's clear here in his case that he denies
20 dishonesty and puts in issue, doesn't he, whether there
21 was an actual loss to the Post Office. Would you agree
22 with what we've just been through?
- 23 **A.** I do, yes.
- 24 **Q.** Then we have "Points taken issue with", and the
25 penultimate paragraph on that page:

80

1 "The defendant would take issue with any Crown
2 evidence that would tend to suggest, imply or infer that
3 his intention was not to balance the accounts in the
4 business and/or that his actions were actuated by
5 an improper motive.

6 "The defendant only accepts such alteration or
7 amendment of documentation as is closed in his
8 interviews and only to the manner and extent that this
9 is detailed in his interviews."

10 Going over the page, please:

11 "The defendant takes issue with any assertion that
12 he caused a loss to the Post Office [to that value], as
13 particularised above.

14 "The defendant would say that he had experienced
15 difficulties in balancing the accounts from the time
16 that he took over the franchise. He believes that this
17 may have been largely the fault of the accounting system
18 and/or equipment that he was obliged to use. The system
19 rarely, if ever, by land, and was always prone to error.

20 "The defendant would say that the Post Office
21 (Consignia) was aware of account balancing problems and
22 errors in the system that the defendant was
23 experiencing. The Post Office sent in people to try to
24 help the defendant with the problems that he was
25 experiencing, but the problems were never remedied and

1 the Lead Investigator in Mr McLaughlin's case, he cited
2 Horizon as the issue and he was prosecuted?

3 A. No, I don't believe it was wrong.

4 Q. In what respect do you say it is not wrong? You're
5 saying here that there were cases where SPMs would cite
6 Horizon as the issue.

7 A. I think what you're asking me that Mr McLaughlin was
8 citing this as a Horizon issue; is that right?

9 Q. I'm asking you whether you think this recollection in
10 your statement is correct, still? Having been through
11 the defence statement in Mr McLaughlin's case --

12 A. Yes.

13 Q. -- his defence was Horizon issues, you were the Lead
14 Investigator in his case and he was prosecuted. So it
15 would appear that this is wrong, this recollection in
16 your statement here; is that right?

17 A. No, because I -- Mr McLaughlin's case, I would not have
18 cited it as a Horizon case and neither did the police
19 believe that or The Crown Prosecution.

20 Q. Okay. Mr McLaughlin cited that though, didn't he, in
21 his defence statement, in terms that we've just looked
22 at?

23 A. Yes, Mr McLaughlin has cited it.

24 Q. Okay. Could we have back on screen, please,
25 Mr McLaughlin's defence statement, which is AMCL0000035,

1 the source of the problems was never discovered."

2 So Mr McLaughlin was clearly setting out here,
3 wasn't he, that he had experienced balancing faults from
4 the outset, after he took over the Brookfield Post
5 Office; wasn't he?

6 A. Yes, he was.

7 Q. He stated in clear terms that he believed the
8 difficulties were caused by the accounting system or the
9 equipment he was required to use, didn't he?

10 A. Yes, he did.

11 Q. He explained that the system rarely balanced and was
12 prone to error and he also goes on to say that Consignia
13 and the Post Office were aware of his account balancing
14 problems and errors on the system.

15 Could we have on screen, please, page 20 of
16 Ms Winter's statement. That's page 20, the top of that
17 page, please. This is a continuation of paragraph 34
18 from the page before, and you say:

19 "I do recall some times when SPMs would cite Horizon
20 as the issue but cannot recall the offices or the
21 issues. I do not recall any of these being prosecuted
22 with me as the Investigating Officer."

23 Having looked through both the interview and the
24 defence statement in Mr McLaughlin's case, do you accept
25 that your recollection set out here is wrong: you were

1 and it's page 5 of that document, please. Scrolling
2 down, please, Mr McLaughlin made a number of disclosure
3 requests in this defence statement, and the paragraph
4 above with the Roman numerals that follow:

5 "The defendant requires any further material to be
6 disclosed that assists with his defence as now
7 disclosed. Any material that undermines the credibility
8 or reliability of the witnesses in the case, or the
9 allegations made should be disclosed forthwith."

10 Then there are some in particular disclosure
11 requests made below. These include: full audit reports
12 at (d) for the business for audits carried out prior to
13 the 26 July; full details of the audit findings from
14 26 July; full details of the trial balances retained by
15 the Post Office; full history of the details of the
16 accounts and reports submitted by the defendant for the
17 period relevant to the charges; and then, scrolling down
18 a little, please:

19 "Details of trading after the defendant ceased
20 having any direct role in the business (including
21 details of any significant and unexplained losses and/or
22 balancing problems and/or other accounting errors that
23 were present)."

24 Then below that:

25 "Any or all documentation or material, in whatever

1 format, showing or tending to show that the defendant
2 had ongoing difficulties in balancing the accounts from
3 the time he took over the franchise."

4 Below that:

5 "Any and all documentation or material, in whatever
6 format, showing or tending to show that the computer
7 operating system that the defendant was obliged to use
8 was prone to error and/or faults (not limited only to
9 faults experienced by the defendant but also general
10 reported or discovered faults across the system as
11 experienced by other post office franchises in
12 a position similar to the defendant)."

13 Then last of all:

14 "Any and all documentation or material, in whatever
15 format, showing or tending to show the Post Office
16 (Consignia) was aware of all the account balancing
17 problems and errors in the system that the defendant was
18 expressing."

19 Were you involved in dealing with these disclosure
20 requests; can you recall?

21 **A.** I can. I can recall I would have been involved with
22 them, yes.

23 **Q.** At this stage, did you have knowledge of any other
24 problems with Horizon causing balancing issues being
25 experienced by other subpostmasters or Post Office

85

1 would be discussed with the police and with the
2 prosecution office. Once I would put a file in to the
3 police, then you always had meetings with them and the
4 Crown Prosecution Office.

5 **Q.** You were in a position, though, of advantage, weren't
6 you, over the police and the Prosecuting Service because
7 you had access to information within the Post Office and
8 could more easily discuss with your colleagues and your
9 seniors what the position was in terms of, in
10 particular, a state of knowledge?

11 **A.** Yes, but if someone has asked me to investigate any
12 information on the computer and how good it is, I will
13 do that and, if I found out anything that was wrong with
14 that computer, I would disclose it.

15 **Q.** Mr McLaughlin's solicitors acting for him at the time
16 commissioned a forensic accountant's report to analyse
17 the Horizon data relied upon to prosecute Mr McLaughlin;
18 do you remember that?

19 **A.** I vaguely recall meeting with him, I think, yes.

20 **Q.** We'll come on to meeting with them. Just in terms of
21 the report, first of all, the report is dated December
22 2004. Can we have that on screen, please, it's
23 AMCL0000031. It's page 37 within this larger document,
24 please. Scrolling down a little, please. This is the
25 front page of the report. We see it's dated 21 December

87

1 employees?

2 **A.** No.

3 **Q.** Did you make enquiries as to whether there was knowledge
4 within the Post Office of other cases where this was the
5 case?

6 **A.** Yes.

7 **Q.** What was the result of those enquiries?

8 **A.** Every time the result, the story, was always the same:
9 that Fujitsu had assured the Post Office that the
10 Horizon system was completely reliable.

11 **Q.** In relation to that last item requested, again, did you
12 make enquiries in this regard for documentation or
13 material showing or tending to show that the Post Office
14 (Consignia) was aware of all the account balancing
15 problems and errors in the system that the defendant was
16 experiencing?

17 **A.** That information would have been requested through the
18 Casework Team and for them to provide that information
19 to me. I cannot recall if it came through but,
20 certainly, any requests would have been put forward to
21 the Casework Team. If I was unable to get the
22 information in Northern Ireland, it would go to them to
23 see if they could get me the information.

24 It would also be discussed -- you also have to bear
25 in mind that everything that's been requested to me

86

1 2004. Have you had a chance, before today, to look
2 through this report? It was one of the documents
3 provided to you for the purposes of doing your
4 statement.

5 **A.** Yes, I have.

6 **Q.** Going, please, to paragraphs 4.4 to 4.6 of this report,
7 which is page 47, scrolling down, please, so down to
8 4.4, please. Under the heading "Missing Dockets/Foils",
9 and there's a figure given there for the amount:

10 "The claim in relation to missing dockets/foils
11 arises due to the number of inputs in relation to
12 a particular Pension and Allowance grouping (P/A
13 grouping) not equalling the number of foils received,
14 ie the number of P/A inputs on the weekly summary and
15 daily adlist equal each other, but are not matched by
16 the number of foils received."

17 At 4.5:

18 "Attached at Appendix E is an example of the Post
19 Office workings in relation to the claim for the week
20 ending 27 December 2000. The variance in relation to
21 this week totals £213.45 ... and is analysed", in the
22 way that is set out in that box below.

23 4.6:

24 "The claim is based on the assertion that the
25 inclusion of a transaction in the absence of

88

1 a supporting counterfoil is evidence that cash has been
2 misappropriated and that Mr McLaughlin was responsible
3 for the discrepancy and hence the alleged loss."

4 Going over the page, please -- and it's a blank
5 page, I think, that one, if we can go over again -- 4.7,
6 under "Group Total Casting Differences", the authors
7 describe the difficulty in understanding a group total
8 casting difference of £201.30 in the week of 31 January
9 2001, and they do so in this way:

10 "The above loss in relation to group total casting
11 difference can be broken down [as in the box].

12 "Attached at Appendix F are the Post Office workings
13 in relation to the claim ... for the week ending
14 31 January 2001. The workings show that although zero
15 units have been claimed in the volume column, an amount
16 of £226.30 has registered in the value column. At
17 present we do not have an explanation or know of
18 a reason as to why this did and could have occurred.

19 "It is extremely unusual that the computer system
20 should allow such an entry to occur. The claim as set
21 out at Appendix F is not supported by any detailed
22 adlists or other documentation on which would give any
23 indication of how this discrepancy has arisen. The
24 transaction log for this particular period is not
25 available. We are therefore unable to comment further

89

1 The existence of such amounts would be more likely to
2 arise as a result of:

3 "(i) Poor bookkeeping and controls;

4 "(ii) Ongoing inaccuracies in the computerised
5 system; or

6 "(iii) A combination of these factors."

7 Going, please, then to paragraph 5.10 of this report
8 over the page, please, under the heading of "Incomplete
9 information", we have this:

10 "The Horizon system is operated by Fujitsu and all
11 transactions recorded by each post office is backed up
12 and held. After a period of 18 months the transactions
13 are deleted from the Fujitsu system. The Post Office
14 did not in their investigations choose to ask for the
15 transaction logs to be provided or retained for the
16 period covering the investigation. The elapse of time
17 is now such that the logs cannot be obtained ..."

18 Pausing there, you say in your statement, Ms Winter,
19 at paragraph 54, that you do not believe Horizon data
20 was available at this time to view. Why do you think,
21 at the point of interview, Horizon data would not have
22 been available to view.

23 **A.** At the time of interview, I am not sure if it was
24 available and, as I said, I don't know but we didn't
25 think it was a Horizon case and the reason was that,

91

1 in relation to this item."

2 Going then, please, to page 51. At 5.4 and 5.5,
3 under a heading of "Negative Balances", the authors of
4 this report point out a negative balance for which
5 Mr McLaughlin would have no incentive and they suggest
6 the entry may be due to ongoing inaccuracies in the
7 computer system. They do so in this way, they say:

8 "Following negative balances are incorporated into
9 the alleged loss totalling £10,288.47", and that's
10 broken down.

11 5.5:

12 "The above amounts have, in effect, been contrad
13 against alleged losses of £11,030.09 to arrive at the
14 loss [figure]. Mr McLaughlin has been accused of
15 dishonesty and with a view to gain for himself or
16 another or with intent to cause loss to another,
17 falsifying documents required for accounting purposes.
18 With the inclusion of negative balances totalling
19 £721.62 Mr McLaughlin is in effect being accused in part
20 of the opposite, ie dishonestly and with a view to loss
21 for himself or another with intent to cause gain to
22 another, falsifying a document required for
23 an accounting purpose."

24 They conclude on this point in paragraph 5.6:

25 "The logic of such an assertion would appear flawed.

90

1 during interview, Mr McLaughlin did state at the start,
2 two years previously, he had ups and downs of the
3 balancing.

4 **Q.** Ms Winter, can I stop you there just to take you back to
5 the question?

6 **A.** Yes.

7 **Q.** The question relates to why it is that you thought that
8 data might not be available to view, as opposed to
9 whether you thought you needed to ask for it. Is it
10 right that you didn't ask for it?

11 **A.** No, I would have asked for it.

12 **Q.** I'm sorry, you said a moment ago that you didn't think
13 this was a Horizon case but you're saying you would have
14 asked for it?

15 **A.** I can't recall but I do know that, if we thought that
16 Horizon information would assist the case, we would have
17 asked for it. There is the possibility with this
18 system, with this case, that the Horizon information may
19 not have been requested.

20 **Q.** Okay. Looking at the conclusion in this report, "The
21 Post Office did not, in their investigations, choose to
22 ask for the transaction logs to be provided or retained
23 for the period covering the investigation", and, if we
24 can just have on screen, please, your paragraph 54.

25 I don't know if it's possible to have that alongside

92

1 this document. It's page 26.

2 Towards the bottom of page 26, paragraph 54
3 starts -- towards the bottom of the page, please, that's
4 the start of 54. Going over to the top, please, of the
5 next page, you say there:

6 "During interview on 26 July 2001 he did raise
7 concerns regarding losses and staff dishonesty but not
8 Horizon. I do not believe Horizon data was available at
9 this time to view ..."

10 Let's leave as a separate point whether he was
11 raising Horizon as an explanation. Why was it that you
12 do not believe that Horizon data was available at the
13 time to view?

14 **A.** I wouldn't have had that information. I'm sorry,
15 I can't recall.

16 **Q.** I'm just trying to understand why you have said here
17 "I do not believe Horizon data was available at this
18 time to view". Why have you included that in your
19 statement?

20 **A.** Because I would believe, from myself and from the way
21 that I worked, if there was any information available,
22 I would have asked for that information. I do not
23 believe, if the information wasn't available -- if it
24 wasn't available, it wasn't available or I was told it
25 wasn't available.

93

1 being experienced by Mr McLaughlin continued after he
2 stopped working in the branch in July 2001?

3 **A.** Yes.

4 **Q.** Did you do that?

5 **A.** I would have spoken with the Retail Line Manager, who
6 would have been responsible for the office.

7 **Q.** What would you have asked that Retail Line Manager?

8 **A.** I would have asked how the person was getting on because
9 I knew that the person that had gone in had been working
10 in the office and had had previous Post Office
11 experience, and to -- usually because the Contracts
12 Manager and the Retail Line Manager would have been in
13 my office a couple of times every week. I'd have asked
14 them "Well, is this business going okay? Are there any
15 problems?" and I say that would have been the only
16 enquiry I would have made.

17 **Q.** You say "would have", can you remember actually doing
18 that in this case?

19 **A.** No, I'm sorry, it's just too long ago.

20 **Q.** The conclusions of the report are set out at section 6,
21 that's on page 61, please, and the conclusions of the
22 report are these:

23 "The Horizon System operating within the Post Office
24 is designed to manage and track cash transactions
25 passing through the post office. Comparison of

95

1 **Q.** On the one hand, you seem to be saying, "Mr McLaughlin
2 was not raising Horizon so I didn't need to ask" and, on
3 the other, you seem to be saying, "Well, I would have
4 asked, so I must not have been there to view"; which is
5 it?

6 **A.** Well, he didn't raise concerns. I can't recall, I'm
7 sorry.

8 **Q.** Okay. In any event, it appears, based on this report at
9 5.10, that, by the time the forensic accountants
10 instructed on behalf of Mr McLaughlin were doing this
11 report, the data was no longer there to be had because
12 of the retention period of Fujitsu.

13 If we could go to page 59 of this document, please,
14 it's paragraph 5.25 that we're looking for, please.

15 This paragraph addresses the continuation of
16 discrepancies after Mr McLaughlin had left the branch
17 and the authors say this:

18 "The data provided in relation to the Support Centre
19 calls (see paragraph 5.21 above) and the cash
20 differences after Mr McLaughlin's departure would
21 indicate that there were continuing difficulties
22 experienced regarding the reconciliation of cash
23 balances at Brookfield Post Office."

24 Did you ever consider, when you were investigating
25 Mr McLaughlin's case, investigating whether any problems

94

1 a 'theoretical cash balance' with an actual cash balance
2 on a weekly basis identifies any discrepancies arising
3 as a result of cash being over or understated (cash
4 surpluses or deficits).

5 "The theoretical cash balance is calculated by
6 taking the previous week's opening balances, adding
7 receipts and deducting payments to calculate a closing
8 cash balance.

9 "As with any system the accuracy and integrity of
10 the information is impacted upon by a number of
11 differing but interdependent factors:

- 12 "(i) the integrity of the computer software itself;
- 13 "(ii) the controls surrounding the system;
- 14 "(iii) the controls surrounding data input;
- 15 "(iv) the accuracy of data input; and
- 16 "(v) the training and quality of staff operating the
17 system.

18 "From our review work in relation to the Horizon
19 system operating in Brookfield Post Office we would
20 conclude that there were clearly ongoing difficulties
21 regarding the reconciliation of cash balances at the
22 post office. This is evidenced as follows:

- 23 "(i) the discrepancies identified as a result of the
24 current investigation;
- 25 "(ii) ongoing cash surpluses and the deficits which

96

1 occurred not only during the period of Mr McLaughlin's
2 employment but which continued after his departure
3 (indeed the magnitude of reported differences increased
4 after his departure in or around July 2001);

5 "(iii) a high number of calls to the helpline many
6 of which related to difficulties regarding the cash
7 reconciliations on the system."

8 Going down, please. Sorry, if we could scroll up
9 a little, please, we just lost (iv):

10 "The evidence produced from the investigation has
11 identified that for a significant number of cash
12 payments made during the period December 2000 to July
13 2001, that supporting pension or allowance vouchers are
14 not available.

15 "The absence of such vouchers could be explained by
16 any of the following (or a combination of these):

17 "(i) that an individual transaction is valid but
18 that the supporting voucher has been lost; or

19 "(ii) that the transaction has been keyed in error
20 and that cash was not in fact paid out; or

21 "(iii) that the transaction has been deliberately
22 created to reduce weekly cash discrepancies but that
23 cash was not in fact paid out; or

24 "(iv) that the transaction had been deliberately
25 created and that cash has also been taken."

97

1 in supporting this assertion:

2 "(i) The differences identified by the review
3 include transactions which have been resulted in cash
4 payments being both over and under stated. The logic of
5 why an individual would create fictitious entries which
6 would require him to lodge money into the system is not
7 apparent. Such differences are more consistent with
8 keying errors or system errors rather than theft.

9 "(ii) For the entries identified and included in the
10 claim there is no direct evidence to trace these entries
11 to Mr McLaughlin, although clearly the subpostmaster he
12 had ultimate responsibility for the operations of the
13 system.

14 "(iii) Furthermore based on the restricted logs
15 available for a number of the transactions claimed in
16 the loss, it would appear that Mr McLaughlin made none
17 of the relevant entries for the relevant days.

18 "(iv) Differences continued and indeed increased
19 after Mr McLaughlin's departure from the post office.
20 This would suggest that surrounding the cash
21 discrepancies were not directly related to his
22 involvement (at least fully so)."

23 So looking at those conclusions in the report, the
24 reliability of Horizon was being raised in this report,
25 wasn't it?

99

1 If we can just scroll down to the end of the report:

2 "Our review has been restricted by the fact that the
3 Transaction Logs which detail all entries to the system
4 are not available. These logs record transactions but
5 also record user IDs which show who has keyed each
6 entry.

7 "The usefulness of these reports is reduced
8 significantly by the fact that individual vouchers
9 cannot be traced through to individual entries on the
10 log and therefore cannot be traced to individual user
11 IDs. However we cannot comment further on whether
12 a review of the full available logs may have assisted
13 our investigation in identifying recurring patterns in
14 relation to the entries identified.

15 "The charges brought against Mr McLaughlin are
16 stated in the following terms:

17 "'That you ... dishonestly and with a view to you
18 for yourself or another or with the intent to cause loss
19 to another, falsified a document required for
20 an accounting purpose ...'

21 "The inference therefore is that the transactions
22 which are not supported by vouchers have been
23 deliberately created by Mr McLaughlin to 'cover up' cash
24 taken by him or another person.

25 "Our review has identified the following weaknesses

98

1 **A.** It was.

2 **Q.** You mentioned a meeting. Do you recall having a meeting
3 with Mr McLaughlin, his then solicitors, and the
4 forensic accountants who authored this report, as well
5 as senior Post Office Management representatives in
6 around January 2005?

7 **A.** No.

8 **Q.** What meeting do you recall?

9 **A.** I recall meeting with a forensic expert. I think it may
10 have been this company, along with one of our auditors
11 and trainers, and it was -- the Horizon system was shown
12 to him and explained but that's the only meeting
13 I recall.

14 **Q.** Do you recall discussion at that meeting of concerns
15 about how the Horizon system could have generated
16 a series of transactions independently of Mr McLaughlin
17 or his staff?

18 **A.** No, I don't recall. I don't recall this meeting that
19 you've mentioned.

20 **Q.** But in the context of meeting with the forensic
21 accountants themselves, do you recall discussion of how
22 the system could have led to the conclusions that
23 they've reached?

24 **A.** Whenever I met this person, this -- the person from the
25 company, he hadn't produced this report. This was

100

1 whenever he was investigating. This report had not come
 2 out.
 3 **Q.** What was the Prosecuting Service's view of this report
 4 insofar as they discussed that with you?
 5 **A.** Well, fully, it had to be disclosed.
 6 **Q.** What impact did this report have on the assessment of
 7 the case by you, first of all?
 8 **A.** Sorry, could you just repeat that?
 9 **Q.** What impact did this report have on the assessment of
 10 the case, first of all, by you; did it impact upon your
 11 assessment of the case at all?
 12 **A.** No.
 13 **Q.** Did it impact upon the Prosecuting Service's view of the
 14 case, insofar as they discussed that with you?
 15 **A.** I would have discussed this case with the barrister and
 16 with the lawyers and, yes, they felt that this report,
 17 of course, had to be disclosed but they still decided to
 18 progress. It was up to them; it was their decision
 19 what -- whether it progressed to court or not.
 20 **SIR WYN WILLIAMS:** Sorry, am I misunderstanding? When you
 21 say this report had to be disclosed, my understanding is
 22 this report had been disclosed to you by the defence?
 23 **A.** No, the report had been disclosed to the prosecution and
 24 myself, Sir Wyn.
 25 **SIR WYN WILLIAMS:** Yeah, sure so it wasn't a question of

101

1 **A.** In my case file. You get a Green Jacket case file and
 2 John Scott, I know, had sight of that case file.
 3 **Q.** As far as you're aware, was that report shared any more
 4 widely with anyone outside of the Security Team?
 5 **A.** I'm not aware of that. It would have went to the -- as
 6 we said, the Crown but, within Post Office, that report
 7 then would have eventually filtered up to the Head of
 8 Security.
 9 **Q.** Can you recall any steps being taken by the Post Office
 10 in response to this report?
 11 **A.** No.
 12 **Q.** That document can come down now. Thank you.
 13 Turning, please, to your involvement in the criminal
 14 investigation and prosecution of Maureen McKelvey,
 15 Maureen McKelvey was prosecuted for theft, contrary to
 16 section 1 of the Theft Act Northern Ireland 1969. The
 17 sum that the theft was said to relate to was £4,623.48.
 18 The theft was said to have occurred between 1 September
 19 2001 and 21 August 2002. Mrs McKelvey was tried and
 20 found not guilty by a majority verdict delivered on
 21 16 September 2004, nonetheless she lost her business and
 22 was made bankrupt.
 23 I'd like to start, please, with the interview of
 24 Maureen McKelvey, which you conducted with Mr Thorpe as
 25 second interviewing officer on 4 April 2002. Could we

103

1 either the prosecution or you disclosing it; Ms Price's
 2 questions are addressed to whether or not, putting it
 3 bluntly, it made any difference to your view of whether
 4 the prosecution should continue.
 5 **A.** I understand the question but it was not my decision to
 6 have --
 7 **SIR WYN WILLIAMS:** No, I follow that. But, insofar as
 8 you -- perhaps you didn't have an opinion but, insofar
 9 as you had an opinion, did it affect your view of
 10 whether the prosecution should continue?
 11 **A.** Yes, I did have the opinion it should continue.
 12 **SIR WYN WILLIAMS:** Fine. Right.
 13 **MS PRICE:** Did you share the report with the Post Office or,
 14 as it would have been then, the Royal Mail Criminal Law
 15 Team?
 16 **A.** I'm not sure, because this was not a Criminal Law Team
 17 case.
 18 **Q.** Yes, but in terms of the wider import of this report,
 19 did you share it with anyone at all within the Post
 20 Office?
 21 **A.** That -- this would have been shared up to the Head of
 22 Security.
 23 **Q.** You say it would have done.
 24 **A.** Yes.
 25 **Q.** How did it make its way to the Head of Security?

102

1 have that on screen, please. It's PNI00000001 and it's
 2 page 50 of that document. I don't think we have the
 3 right page here: page 50. That's it. Thank you.
 4 So we can see here the date, 4 April 2002. You and
 5 Mr Thorpe are listed as the interviewing officers.
 6 Although Mr Thorpe appears first here, you seem to be
 7 listed first in the continued record of tape recorded
 8 interview and I think it's right, isn't it, that you
 9 were, in fact, the Lead Investigator in this case,
 10 notwithstanding the order of the names on this?
 11 **A.** Yes, that's right.
 12 **Q.** Going, please, to page 52. The background to the case
 13 is summarised by you about two-thirds of the way down
 14 the page, and you say:
 15 "And my friend Mr Thorpe and Mr Kenny, the auditor,
 16 we arrived at the office this morning about 8.30 and
 17 introduced ourselves to you and I stated to you that I'd
 18 asked for a special audit to be conducted this morning
 19 at the Clanabogan Post Office because of accounting
 20 irregularities reported from Chesterfield. We went into
 21 the post office and you opened up, you produced all the
 22 cash and stock to the auditor and an audit was conducted
 23 by Mr Kenny and you were present during the audit. You
 24 were also advised of your legal rights and that we'd be
 25 interviewing you on tape recorder once the audit had

104

1 been conducted. I also explained to you that the office
2 would be closed and would remain closed until our
3 enquiries had been completed. You were also advised you
4 could have legal representation or phone someone from
5 the Federation."

6 Going then, please, to page 54. The third question
7 on this page is from you:

8 "So if you can just talk me, and if you come towards
9 the end of the week and you're doing your cash account."

10 **"Answer:** That's Wednesday yeah.

11 **"Question:** How do you go about preparing everything
12 for your cash account.

13 **"Answer:** On the Wednesday?

14 **"Question:** Yes."

15 Then Maureen McKelvey very gives an account and she
16 says:

17 "Well usually we try to, we're supposed to close at
18 12.30 but we don't really get closed because in the
19 country community people keep coming, you're trying to
20 do your audit now. Garry Groogan was in with me on one
21 of the days when I was trying to do my audit and he
22 realised, you know, that people do still keep coming and
23 expect you to serve them or take stuff off them while
24 you're doing it and you do that because it's expected of
25 you, that's the way it's always been and you try to

105

1 So Maureen McKelvey was telling you here that she
2 sometimes had trouble balancing but that, where she
3 couldn't find the cause, she would expect it to balance
4 out the next week; is that right?

5 **A.** Yes.

6 **Q.** This interview was taking place less than a year after
7 you interviewed Mr McLaughlin. Did what Maureen
8 McKelvey was telling you here, that you didn't always
9 balance first time, that you could be short, you'd look
10 for the reason why, you'd expect it to come out in the
11 wash, in essence, did you link this at all to what
12 Mr McLaughlin had told you in his interview, in
13 particular about his problems balancing with the Horizon
14 system?

15 **A.** No, because Mr McLaughlin's problems with balancing was
16 due to staff dishonesty.

17 **Q.** Going, please, to page 76 of this document. This is the
18 second section of the record of tape recorded interview,
19 following a short break after the first part of the
20 interview, and about a third of the way down the page,
21 we have:

22 **"Question:** Just before the completion of the
23 interview I just want to confirm a conversation that
24 I had with Mrs McKelvey this morning where Mrs McKelvey
25 you produced a bundle of 12 paid pension and allowance

107

1 audit and do everything, you know, put everything out to
2 go through it at different stages on the computer and
3 bring it all to a balance now it doesn't always balance
4 first time as we all know, you might have to go through
5 the stuff again and check it all and redo, you know,
6 some of it, but that's normal procedure and you try to
7 balance as close to it as you can also we have an
8 account with Camphill Community which they buy a lot of
9 stamps, they post a lot of parcels to foreign countries
10 and we put money down on their account for them for the
11 stuff they get out of the Post Office so we have to try
12 to work between each week to what they have got, you
13 know, out in postage or stamps and try and, if you're
14 short, that's probably where it is, you go and look.
15 It's probably where it is at the end or you've made
16 a mistake and you have to go back and check it, which
17 I always do. But some weeks if I'm out, the next week
18 it usually balances itself out, you know, it's neither
19 big amounts here or there. I know it will balance
20 itself out and I'm happy enough with that [because] I'm
21 the ones who's doing it and I know if it's a mistake
22 made, I know I have made it and just a simple mistake
23 and it will all sort itself out the following week but
24 that's the way I do to the best of my ability and
25 I don't do anything wrong as far as I see."

106

1 foils with an adlist paper clipped around them and the
2 date on the adlist was 4 May 2001 timed at 17.52 and it
3 was cash account period 07 and you had stated to me that
4 you had found the bundle of foils last week in
5 an envelope under the counter in the Post Office; is
6 that correct?

7 **"Answer:** Yes.

8 **"Question:** You also stated to me you had intended
9 to contact the Post Office to advise how you were going
10 to get rid of the bundles of foils and because of the
11 Easter period as yet you hadn't contacted anyone, is
12 that correct?

13 **"Answer:** Yes", and goes on to talk about that.

14 Then about two-thirds of the way down the page, we
15 have from Mr Thorpe:

16 "FT: We can have with us (paper rustling) the foils
17 to be checked to date would you like to examine those
18 foils again, that's with the tape record off whilst you
19 do that, if you would like to examine them in any way."

20 **"Answer:** No.

21 **"Question:** To see if there's anything on there that
22 you can suggest there has been a problem.

23 **"Answer:** Are these foils wrong, you're saying,
24 these are the ones from ..."

25 You say:

108

1 "From this schedule."
 2 **"Answer:** No, that's okay. No, they're okay."
 3 Scrolling down, Mr Thorpe says:
 4 "Week 48 there, just you know."
 5 **"Answer:** If it's there it's there like, I can't,
 6 you're saying it's on the paper, that's it."
 7 You ask:
 8 "Have you anything else you'd like to say
 9 Mrs McKelvey before we conclude the interview?"
 10 Then over the page:
 11 **"Answer:** Yes I do believe I did everything to the
 12 best of my ability, I've been doing this for 11 years
 13 and I done it right, if there's been an error on the
 14 computer?? I've just done that, I didn't mean to do it,
 15 that's all I can say."
 16 So Mrs McKelvey had been saying that she was
 17 content, she wouldn't find an issue with the paper
 18 copies of the documents themselves, that's right isn't
 19 it, towards the end of the bottom of the last page; is
 20 that your understanding of what she was saying?
 21 **A.** Yes.
 22 **Q.** But here, this reference to error on the computer, given
 23 what Maureen McKelvey had told you towards the start of
 24 the interview, about sometimes having trouble balancing,
 25 not being able to balance first time, did this give you

109

1 the items that I would investigate and I could see no
 2 problem and I would have asked what about the Fujitsu
 3 system, especially on one occasion whenever I had
 4 problems myself with my own computer, and someone was
 5 able to go in remotely, and fix my computer.
 6 And this was the first time I'd ever seen something
 7 like this happening, and I raised the question,
 8 I remember clearly raising the question with Casework:
 9 can Horizon be accessed remotely because I could not
 10 find out what was wrong in an office; and they said no.
 11 So, at all times, whenever you were interviewing,
 12 you were thinking that the computer was 100 per cent
 13 reliable.
 14 **Q.** Can you recall when you raised that question of
 15 casework?
 16 **A.** I would have said -- I know where I was sitting in
 17 an office, I moved office location, but I remember it
 18 would have been sitting in the Royal Mail House in
 19 Belfast. So it may have been about maybe 2006, 2007.
 20 I was surprised that this could be done and
 21 I immediately thought about Horizon and could this be
 22 remotely accessed and they said no. And you have to
 23 remember, I'm being told no by the Post Office, who is
 24 the Government, and you just -- it just did not enter
 25 into your head that this was the wrong information.

111

1 any pause, again particularly since this was not the
 2 first subpostmaster who had raised the general point
 3 about having trouble balancing on the Horizon system?
 4 **A.** At that stage of the interview, from what I recall from
 5 the papers I've received, the documents I've received,
 6 Mrs McKelvey had been saying that she'd had no bother
 7 balancing and that, if she had any problems, she would
 8 have contacted John McKenny. So it wasn't really
 9 a highlight, because she had said previously, I think,
 10 during the interview, that she'd had no problems
 11 balancing and, as we had always been told, the Fujitsu
 12 system was reliable.
 13 **Q.** Does it follow that, after the interview, you didn't
 14 discuss the relevance or otherwise of either the
 15 difficulties of balancing in general or this reference
 16 to the error on the computer with any colleagues or
 17 seniors to see if anyone else was struggling?
 18 **A.** It was always discussed. The Horizon computer system
 19 would have been discussed between other members of my
 20 team, whenever -- I'm saying the North Team, you -- or
 21 even with Auditors, with Trainers, we would have
 22 discussed the Horizon system. And I remember
 23 I challenged the Horizon system on a number of
 24 occasions, where the subpostmaster had said to me that
 25 everything was okay, I had done the investigation of all

110

1 **Q.** Did you consider requesting audit data from Fujitsu
 2 following the interview with Maureen McKelvey?
 3 **A.** I do not recall. When was that? 2002. I don't recall.
 4 **Q.** In August 2004, some further documents relevant to
 5 Maureen McKelvey's case were sent by the PSNI to the
 6 PPS. Could we have on screen, please, PNI00000001. If
 7 I can just give you another reference, please, another
 8 version of this. PNI00000001_071.
 9 This is a covering letter to the documentation
 10 I just referred to, the further documents provided in
 11 August 2004. It is a letter dated 16 August 2004 to the
 12 PPS, scrolling down, please from the PSNI, and it says:
 13 "Please find attached further documentation for your
 14 information as to disclosure."
 15 Going forwards, please, to page 14, there is here
 16 a handwritten letter from Maureen McKelvey which says
 17 this:
 18 "Dear Sir/Madam
 19 "The Icon for Return of Com Loose Coins were gone
 20 off the screen when I went to return them. 10/10/01.
 21 I had to balance or take loss of £120. In [something]
 22 Helpdesk told me to write to you to claim back £120.
 23 "Yours sincerely Maureen McKelvey."
 24 So Ms McKelvey appears to have been reporting here
 25 an error which appears to have caused a balancing issue,

112

1 doesn't she?
 2 **A.** Yes.
 3 **Q.** We have then on page 19, a table of helpline calls made
 4 from Maureen McKelvey's branch. On page 20, please, we
 5 have three entries down, an entry on 16 January 2002,
 6 which says, "Discrepancy" and then "Description":
 7 "Wanting to make a discrepancy good over £100. TP
 8 have informed them due to showing the loss on the cash
 9 account last week to make good this week -- not taken
 10 out of suspense yet."
 11 Then:
 12 "Advised how to take out and to put the shortage
 13 amount to cover in the system which will tie it up when
 14 balancing."
 15 Then going to page 22, please, we have an entry on
 16 10 October 2001. The problem text says:
 17 "PM reports a minus figure of [minus] £120 on their
 18 balance snapshot but the correct figure of £120 in
 19 adjust stock.
 20 "Closure text
 21 "Call closed by Simon Davies: pm has minus figure
 22 showing when she goes to balance report for
 23 commemorative coins -- trans to NBSC as not sure if they
 24 have been withdrawn from the system."
 25 Then over the page, an entry on 16 January 2002:
 113

1 investigation, assuming for a moment that they were
 2 obtained for the first time in August 2004, would that
 3 have altered your view of the case at all, that there
 4 had been reports of discrepancies?
 5 **A.** No, I don't think it would have altered my view of the
 6 case.
 7 **Q.** Could we have on screen, please, PNI00000001_082.
 8 **SIR WYN WILLIAMS:** While that's being done, Ms Price, we
 9 normally finish at about now on a Friday. What's your
 10 plan, so to speak?
 11 **MS PRICE:** Sir, I have about another five minutes, if that,
 12 of my questions. That's the only reason I hadn't
 13 suggested a break so far.
 14 **SIR WYN WILLIAMS:** Then are there Core Participant
 15 questions?
 16 **MS PRICE:** There are Core Participant questions, yes, sir.
 17 Judging by the discussions I've had so far, I would
 18 think about 20 minutes.
 19 **SIR WYN WILLIAMS:** Okay. Well, can I just tell everyone
 20 that I'll be looking to finish shortly after 3.30 and
 21 I'm happy to go on until then because we lost half
 22 an hour this morning but, after that, I'll be looking to
 23 finish. So people should tailor their questions
 24 accordingly.
 25 **MS PRICE:** Thank you, sir.
 115

1 "PM has discrepancy of over £100 which she wants to
 2 make good."
 3 That's transferred to NBSC, which may well be linked
 4 to the call we were looking at before.
 5 So there were a number of calls, we can see, from
 6 these tables, from Maureen McKelvey's branch reporting
 7 balancing problems or discrepancies, weren't there?
 8 **A.** Yes, discrepancies, yes.
 9 **Q.** Given when this documentation was being provided, so
 10 August 2004, can we take it that this documentation was
 11 not obtained by you in your initial investigation but
 12 later, for the trial?
 13 **A.** I don't recall.
 14 **Q.** Well, you told us before that you would give everything
 15 that you obtained in your investigation, in effect, to
 16 PSNI and then onward to PPS, so presumably had you
 17 obtained helpline call logs like these, or documents
 18 relating to reports or complaints relating to
 19 discrepancies, they would have appeared in your original
 20 file and that would have gone earlier, not in 2004, to
 21 the police and the prosecuting service; is that right?
 22 **A.** That's right. That is right, but I just cannot --
 23 you've asked me to recall did I send that? I can't
 24 actually recall it, but I would like to think I did.
 25 **Q.** Had you seen these documents at the time of your initial
 114

1 We can see this is a covering letter to your report
 2 produced to the PSNI and ultimately the PPS in Maureen
 3 McKelvey's case. It's dated January 2004, so scrolling
 4 down, "This file refers to a theft from the post
 5 office", and that's the covering letter from the police.
 6 Scrolling up to the top, please, to the legal registrar.
 7 Then going to page 4, please, we have the actual report.
 8 Scrolling down, please, we have your name next to
 9 Mr Thorpe's name as Team Leader, and the date of the
 10 report is December: date report submitted, December
 11 2002.
 12 Going, please, to page 7 about halfway down the page
 13 you give an account of the case and, starting "The Paid
 14 Order Unit", I'm just going to let you cast an eye down
 15 that, rather than reading it all out, for time reasons.
 16 Then going down to the bottom, please. We get to
 17 penultimate paragraph, the interview, and at the bottom
 18 you say:
 19 "McKelvey could or would not offer a reason for the
 20 discrepancies and stated she had done everything to the
 21 best of your ability."
 22 Over the page, please:
 23 "At the conclusion of the interview McKelvey was
 24 informed further checks needed to be completed of the
 25 pension and allowance ... McKelvey and Atherton were
 116

1 invite to observe the checking of the outstanding
 2 pensions add allowance pouches."
 3 Scrolling down, please, you'll see:
 4 "McKelvey offered no explanation regarding the
 5 additional overclaims identified.
 6 "McKelvey has made no admissions of guilt in this
 7 matter and states she has done everything to the best of
 8 her ability.
 9 "The discrepancies summarised on the pension
 10 schedule indicate it is due to deliberate action and not
 11 error and McKelvey is the only person with the
 12 appropriate access and opportunity.
 13 "Maureen McKelvey has rendered herself liable to
 14 prosecution and in view of the availability of evidence
 15 to support such actions these papers are forwarded for
 16 authorisation to prosecute."
 17 You do not mention here, do you, the references to
 18 balancing issues and the reference to computer error in
 19 the interview. Can you help with why not?
 20 **A.** That report there is regarding the whole investigation
 21 and, if you listen to the whole tape transcript, the
 22 computer was not -- I'm trying to think what way you
 23 would say this -- that the computer did not seem to be
 24 at fault because what was actually happening was
 25 a human -- a person putting the information into the
 117

1 of a report in the second half of 2001 by Mrs McKelvey
 2 to Garry Groogan ... in relation to problems with the
 3 Horizon computer system."
 4 So they're seeking that. Then at paragraph 3:
 5 "Disclosure of all records relating to the reporting
 6 of problems encountered at Clanabogan Post Office
 7 following the suspension of Mrs McKelvey in relation to
 8 the Horizon computer system."
 9 So disclosure was being sought, in essence, in
 10 relation to problems with the Horizon system. So do you
 11 recall that being a part of Mrs McKelvey's case?
 12 **A.** No, I'm sorry, I don't recall that.
 13 **Q.** Okay. Having seen that and being aware that it was
 14 a part of Mrs McKelvey's case, albeit that you can't
 15 recall that now, do you accept that your
 16 characterisation of Mrs McKelvey's case as not relying
 17 on Horizon discrepancies is not quite right?
 18 **A.** No, because it wasn't Horizon discrepancies. The case
 19 of Mrs --
 20 **SIR WYN WILLIAMS:** I think we are going round in circles
 21 now, really.
 22 **MS PRICE:** Yes, sir.
 23 **SIR WYN WILLIAMS:** As interesting as it may be, I don't
 24 think Ms Winter's characterisation of the case is what
 25 is at the heart of this now, is it?
 119

1 computer.
 2 **Q.** You reached a conclusion that Maureen McKelvey had
 3 rendered herself liable to prosecution. Were you
 4 applying any particular test in reaching that
 5 conclusion?
 6 **A.** The test was that the whole investigation was based
 7 around foils being counted by a person and that person
 8 entering the information into the system. It wasn't
 9 that the system was doing something. It was a human
 10 being that was doing something.
 11 **Q.** At paragraph 70 of your statement, you say, in essence,
 12 that, that Mrs McKelvey's case relied heavily on paper
 13 vouchers, foils and cash requests and deliveries rather
 14 than Horizon discrepancies. But it's right, isn't it,
 15 that the defence raised Horizon integrity issues at
 16 trial; do you remember that?
 17 **A.** No, perhaps could you remind me?
 18 **Q.** Well, let's start with a letter from Mrs McKelvey's
 19 solicitor dated 22 July 2004. This is a letter seeking
 20 secondary disclosure and that's PNI00000001_073.
 21 Looking, please, at paragraph 2, this is a request. It
 22 appears to be what prompted disclosure of the documents
 23 we looked at earlier in August 2004. At 2:
 24 "Disclosure of all records held by the Post Office
 25 Limited Investigations Unit, Social Security Agency ...
 118

1 **MS PRICE:** Sir, that was the last of my topics for
 2 Ms Winter.
 3 So I will hand over to Core Participants, given the
 4 time.
 5 **SIR WYN WILLIAMS:** Thank you.
 6 **MS PRICE:** Mr Moloney is first, sir.
 7 **Questioned by MR MOLONEY**
 8 **MR MOLONEY:** Thank you very much.
 9 Ms Winter, I have just two topics for you. The
 10 first is this: did PSNI rely on Post Office employees,
 11 such as you, for assistance as to the operation of
 12 accounting procedures in Post Office branches?
 13 **A.** Yes.
 14 **Q.** So you were one of the people who provided that type of
 15 assistance to PSNI?
 16 **A.** I would have provided that assistance plus my Team
 17 Leader.
 18 **Q.** Yes, that's the first topic.
 19 The second topic is this: you first said at about
 20 10.45 this morning that "We were told that the system
 21 was 100 per cent reliable", and you've explained that
 22 you were told at the training college and that was
 23 reinforced by Senior Managers and you've repeated that
 24 a number of times today, yes?
 25 **A.** Yes.
 120

- 1 Q. Just looking at Mr McLaughlin's case, whatever you may
2 say about the interview -- and I don't propose to debate
3 the merits or otherwise of your analysis of that
4 interview -- you'd received a defence statement which
5 put Horizon reliability front and centre, it said that
6 documents were altered to deal with discrepancies
7 without any dishonesty. This was said in that defence
8 statement at a time when nobody could say there was
9 a Horizon bandwagon in existence; would you agree with
10 that?
- 11 A. Yes.
- 12 Q. You had a report from the forensic accountants McClure
13 Walters that showed that there were negative entries in
14 the accounts for which Mr McLaughlin would have no in
15 incentive. He would, in effect, have been defrauding
16 himself, yes?
- 17 A. Yes.
- 18 Q. The authors suggested that the entries might be due to
19 ongoing inaccuracies in the computer system. There were
20 also discrepancies that continued after Mr McLaughlin
21 had left the Brookfield branch and Mr McLaughlin could
22 not have carried out all the transactions. I just want
23 to ask you about that report. Did that report from the
24 forensic accountants not cause you to question whether
25 the system was 100 per cent reliable?

121

- 1 A. If the DPP had asked for a statement, it would have to
2 be produced.
- 3 Q. Now, you said your file was sent to Post Office, yes?
- 4 A. Yes.
- 5 Q. You said Mr Scott would have had it?
- 6 A. Yes, because I do remember at the time of what was
7 Second Sight, which was -- well, Second Sight, on my
8 files, past files were all asked to go to John Scott
9 personally.
- 10 Q. Right. So it's at that time you think Mr Scott would
11 have had it?
- 12 A. Not at the time, Mr -- I'm saying that, later on, all
13 our files went to Mr Scott.
- 14 Q. At the time of Second Sight?
- 15 A. And one of --
- 16 Q. Head of Security in 2005 was Mr Marsh, yes?
- 17 A. Yes.
- 18 Q. Did Mr Marsh get it?
- 19 A. No, I can only remember sending all the files to John
20 Scott personally. They had to go to him personally.
- 21 Q. Right. So at the time of Mr McLaughlin's proceedings,
22 did you send this report to Post Office Security senior
23 levels?
- 24 A. That report would have went into Casework and it would
25 have went into my file and then your files are examined

123

- 1 A. It did ask me to question myself. But it also -- I also
2 questioned some of that report.
- 3 Q. Of course. Did you ever, when you questioned Horizon in
4 that way, the 100 per cent reliability, did you seek
5 assistance as to the significance of those findings
6 before the prosecution continued and, when I say
7 significance, from Fujitsu or from technical experts
8 that Post Office could contact?
- 9 A. Yes, from Fujitsu.
- 10 Q. You requested -- you requested permission -- assistance
11 from Fujitsu, did you?
- 12 A. There would have been a statement would have been
13 requested from Fujitsu because I do remember that, at
14 the time that I requested a statement, I was told by
15 Casework that they didn't think a statement existed from
16 Fujitsu and it would take a while to get that statement.
- 17 Q. Did you get a statement, Ms Winter?
- 18 A. Because I've -- from what I can recall, from that --
19 I remember discussing this report with the Director of
20 Public Prosecutions and it was him that said we would
21 need to have a statement because of this defence from
22 Mr McLaughlin; we would need a statement from Fujitsu.
- 23 Q. Did you get one?
- 24 A. Yes.
- 25 Q. You are saying you got a statement from Fujitsu?

122

- 1 and I suppose I would have assumed that Casework would
2 have passed that on.
- 3 Q. Did you flag the report as raising interesting issues
4 when you sent it?
- 5 A. Yes.
- 6 Q. You did?
- 7 A. I flagged the report with my line manager at the time,
8 I mean, it was -- the statement coming through, yes.
- 9 Q. Who was your line manager at the time, Ms Winter?
- 10 A. That would -- it may have been Les Thorpe, or --
- 11 Q. Mr Thorpe's left Post Office in January 2003. This will
12 have been February 2005 when the proceedings against
13 Mr McLaughlin finished.
- 14 A. It may have been Dave Pardoe --
- 15 Q. Did anybody --
- 16 A. -- or --
- 17 Q. -- contact you about it, Ms Winter?
- 18 A. Pardon?
- 19 Q. Did anybody contact you about the report when you
20 flagged it?
- 21 A. I don't recall.
- 22 Q. But, just to be clear, you're sure that Post Office had
23 been sent the forensic accountant report from McClure
24 Walters about the case of Alan McLaughlin before Lee
25 Castleton's case was heard in the High Court in 2006?

124

1 A. I wouldn't recall dates, I'm sorry.
 2 Q. Well --
 3 A. It would have went -- this report would have went higher
 4 up, because of what it was stating.
 5 Q. Because Mr McLaughlin pleaded guilty in February 2005.
 6 Did you wait until 2007 to send this report to Post
 7 Office or did you send it in 2005?
 8 A. It would have went in 2005.
 9 MR MOLONEY: Thank you very much, Ms Winter.
 10 SIR WYN WILLIAMS: Mr Moloney, can I ask you and Ms Price as
 11 well, do we actually know whether or not a statement
 12 from Fujitsu was obtained in this case?
 13 MR MOLONEY: We haven't seen one, sir, but we'll check the
 14 detail and come back to you with that.
 15 MS PRICE: Sir, I haven't seen one either, if that helps.
 16 SIR WYN WILLIAMS: Well, I'd rather assumed that but I don't
 17 think it should be a secret, so to speak, what's going
 18 on. All right.
 19 MR MOLONEY: Thank you.
 20 SIR WYN WILLIAMS: Mr Jacobs, yes?
 21 **Questioned by MR JACOBS**
 22 MR JACOBS: It's me next, sir.
 23 Ms Winter, I act for four ladies: Maureen McKelvey,
 24 who sits next to me; Deidre Connolly, who sits behind
 25 me; Katherine McAlerney, who sits behind me and Heather

125

1 screen, for reasons of time and because we've seen it
 2 already.
 3 When you are summarising to the Northern Ireland
 4 Police Service your investigation, you say:
 5 "McKelvey could not or would not offer a reason for
 6 the discrepancies and stated that she had done
 7 everything to the best of your ability."
 8 Then it stops. Now, what she said in her interview,
 9 and this is the bit that you're summarising is:
 10 "I believe I did everything to the best of my
 11 ability, I've been doing it for 11 years, I think I've
 12 done it right but there's a problem, there's probably
 13 been a problem on the computer", words to that effect.
 14 Now, you didn't give the full quote. You omitted
 15 from your investigation report what she had expressly
 16 said in the interview when you were summarising that
 17 interview. That's right, isn't it, and why did you do
 18 that?
 19 A. This was a summary of my report in the way that I had
 20 been directed by the police because the police advised
 21 me how to do that report and that everything then would
 22 be produced, the tape transcript, statements for
 23 everyone to read, rather than taking a summary of my
 24 report.
 25 Q. All right, so in your summary of the report, you

127

1 Earley who sits behind me. You were the Lead
 2 Investigator in Ms Connolly's case and Ms McAlerney's
 3 case and you were involved in Ms Earley's case.
 4 But I want to ask you about Mrs McKelvey and, in
 5 relation to her interview, Ms Price took you to part of
 6 the end of the first tape in her interview which took
 7 place on 4 April 2002. I don't want to put the document
 8 on screen. I'll read out what we saw before.
 9 So right at the end of the interview, you asked:
 10 "Have you anything else you'd like to say
 11 Mrs McKelvey before we conclude the interview?"
 12 She said:
 13 "Yes, I do believe I did everything to the best of
 14 my ability, I've been doing it for 11 years and I've
 15 done it right."
 16 Then:
 17 "If there's been an error on the computer?? I've
 18 just done that, I didn't mean to do it, that's all I can
 19 say."
 20 Then you didn't ask any more questions about the
 21 computer, you just said:
 22 "Here's a notice advising you what will happen to
 23 the tapes."
 24 Now, I want to go to your investigation report and,
 25 again, I'm not going to ask for this to go up on the

126

1 deliberately, because you say the police told you to do
 2 this, left out what Mrs McKelvey told you about the
 3 computer; is that what you're saying?
 4 A. No, that's not what I'm saying.
 5 Q. Could we go, please, to Mrs McKelvey's witness
 6 statement, and this is in relation to what happened at
 7 her trial. So it's WITN03700100. If we could go,
 8 please, to paragraphs 37 to 44 and that's at page 6 of
 9 the document. So this is Mrs McKelvey's account of her
 10 trial. She says:
 11 "In 2006, my case came to trial at Dungannon Court
 12 in Northern Ireland. I had to attend court for a full
 13 week. I was still on a lot of medication at this point
 14 because my health was not good.
 15 "My experience in the court was dreadful. I had to
 16 sit and listen to all of the evidence the Post Office
 17 had against me, and it was clear in their eyes I was not
 18 worthy of the Post Office."
 19 Then, significantly, she says:
 20 "The way the Post Office tried my case was by asking
 21 me to pick out a number of days at random that according
 22 to them I had balanced wrong and so owed the Post Office
 23 money."
 24 Over to paragraph 40, please:
 25 "They went through all the evidence and marked up

128

1 everything they thought I'd done wrong.
 2 "However, it just so happened that one of the days
 3 I picked out was actually a balance that I did not do
 4 but was still short. I was able to prove that I had not
 5 carry out the balance on that particular day because my
 6 son had an accident and I had to take him to hospital.
 7 So a man named Garry Groogan ..."
 8 Pausing there, he was the Area Manager in Omagh,
 9 wasn't he?
 10 **A.** Yes.
 11 **Q.** "... who was employed by the Post Office and was the
 12 manager of the Omagh Post Office did the balance in my
 13 office that day.
 14 "My solicitor pointed this out to the court, and we
 15 were able to prove that Garry had carried out the
 16 balance, because he did it in a red pen and used
 17 a completely different method to me but it still came
 18 out short."
 19 So, effectively, one of the incidents of theft, of
 20 stealing, that Mrs McKelvey was accused of, had actually
 21 been carried out by the Area Manager while she wasn't in
 22 the branch. That's the long and the short of it.
 23 Then at 43:
 24 "It was at this point that the judge and jury
 25 realised what the Post Office was trying to do, and you
 129

1 31 October 2001 ..."
 2 Then you go on to say:
 3 "It just seems strange."
 4 Ms McKelvey says:
 5 "Prepared differently from other weeks, red tick on
 6 list."
 7 You asked her if anything came to mind and it was
 8 Hallowe'en.
 9 Then, over the page, please. You say, just before
 10 15.51 that there was a little red tick on that schedule
 11 which indicated someone else different had done the
 12 pensions because that's not the way they were normally
 13 presented.
 14 Then over the page, please, again, at 17.17, Maureen
 15 McKelvey says:
 16 "Would that have been the week that we had the
 17 errors and I got Garry out?"
 18 She goes on to say:
 19 "That seems like Garry or someone has checked all
 20 the bundles or something. There was a week that, so
 21 hard to remember ..."
 22 So we can take that off the screen now. So what
 23 we've got here is we've got you, raising that week 32
 24 had been done differently to all the other weeks where
 25 there were discrepancies. Can you see that you raised
 131

1 could see that the judge was less than impressed by the
 2 Post Office now. The judge took a very dim view of what
 3 the Post Office had done.
 4 "If I had not spotted that Garry had done the
 5 balance that day, I would have no doubt that I would
 6 have been looking at jail time."
 7 Now, to be fair to you, this was something that you
 8 spotted in the interview; do you recall that?
 9 **A.** No, I don't recall.
 10 **Q.** Can we go, please, very quickly, to that interview,
 11 PNI00000001_062 and it's page 86 of 304, on the pdf,
 12 it's probably one of the longest documents we've had to
 13 look at, but page 86.
 14 It's at 12.46, just waiting for it to come on the
 15 screen. I'll try and get through this quickly because
 16 it's a simple point. I just want to show you that you
 17 raised it. 12.46, please, great. So you say:
 18 "Why I'm asking, I'm showing you copies of the
 19 updated pension schedule dated 21 May ..."
 20 Then you go on to say:
 21 "My interest why anybody had covered for you, if we
 22 go to the final page of the summary ..."
 23 Then you talk about week 32, halfway down the page:
 24 "I've indicated it W prepared differently to other
 25 weeks compared to the way, week 32 was week ending
 130

1 that?
 2 **A.** That's right.
 3 **Q.** Now could we go back to the investigation report which
 4 is at PNI00000001_082, and it's page 8 in the pdf.
 5 Very grateful to the person who is putting this up
 6 on the screen, it's a long document. Great.
 7 So if we go to the end of that document, please, and
 8 scrolling down. Okay, so we can see here:
 9 "The discrepancies summarised on the pension
 10 schedule indicate it is due to deliberate action and not
 11 error and McKelvey is the only person with the
 12 appropriate access and opportunity."
 13 Then you go and say:
 14 "Maureen McKelvey has rendered herself liable to
 15 prosecution ..."
 16 Now, my question for you is: can you see that you
 17 are misrepresenting the fact that it was thought that
 18 someone else had done one of the discrepancies? Why
 19 didn't this go in the investigation report, Ms Winter?
 20 **A.** Because this was a summary.
 21 **Q.** So it's the same answer: you didn't think this was
 22 something -- even though we now know that's the basis of
 23 the acquittal, you didn't think this was something that
 24 should go in your investigation report to inform the
 25 Police Service whether to charge my client?
 132

1 A. I would like to ask, was that the basis of the
2 acquittal?
3 **SIR WYN WILLIAMS:** Well, I think nobody knows that, with
4 respect to you all.
5 A. That's what I mean, that it was the --
6 **SIR WYN WILLIAMS:** So --
7 **MR JACOBS:** Yes, well, my client's evidence is that that was
8 the basis.
9 **SIR WYN WILLIAMS:** Well --
10 **MR JACOBS:** I don't want to get into an argument, of course.
11 **SIR WYN WILLIAMS:** Excuse me, can I just ask, was this
12 a jury trial?
13 **MR JACOBS:** Yes.
14 **SIR WYN WILLIAMS:** Well, I think that's enough to answer the
15 question, Mr Jacobs.
16 **MR JACOBS:** In relation to that trial, you have said in your
17 statement at paragraph 59, that you have no direct
18 recollection of the case; is that right?
19 A. Direct recollection of the investigation or of the court
20 case?
21 Q. You say:
22 "I do not have any direct recollection of this case
23 and therefore I can only rely on what is contained in
24 the documents provided to me with the request."
25 A. That's right. I've read all the documents that have
133

1 brand."
2 Do you recall the judge saying that?
3 A. I recall the judge saying at the beginning of the case
4 that was this case being presented by Post Office or
5 Consignia?
6 Q. Do you recall the judge telling you and your team that
7 the jury had been right to return a Not Guilty verdict?
8 A. No.
9 Q. Do you recall the judge saying that the Post Office had
10 been trying to trap Mrs McKelvey into pleading guilty?
11 A. Absolutely not. I do remember the jury was out for
12 quite some time.
13 Q. Mrs McKelvey says that the judge told her that she could
14 leave the court with her head held high and never have
15 to look back at the Post Office again; do you remember
16 that?
17 A. No, I'm sorry, I don't recall.
18 Q. Mrs McKelvey says that you were visibly devastated at
19 the outcome and you had your head in your hands whilst
20 this was going on; does that ring any bells?
21 A. That would be definitely not.
22 Q. Coming towards the end of my questions, sir.
23 We've heard evidence from Rob Wilson, who was the
24 Head of Criminal Law at the Post Office, that there
25 would be a review when the Post Office lost a case; is
135

1 been sent to me.
2 Q. Now, my client finds that difficult to believe, and I'll
3 tell you why, and I'm going to ask you a series of
4 questions. Do you recall that you attended every day of
5 that four-day trial in September 2004?
6 A. I recall -- I recall going to court.
7 Q. Do you recall you gave --
8 A. I recall my witnesses and I believe it was -- Charlie
9 McKay was the barrister.
10 Q. Do you recall that you gave evidence as a prosecution
11 witness?
12 A. I recall giving evidence; I don't recall what evidence
13 but I do recall giving evidence.
14 Q. Do you recall that, after the jury returned their Not
15 Guilty verdict that the trial judge, Judge McFarland
16 made number of comments that were very critical of the
17 conduct of the Post Office?
18 A. I don't recall.
19 Q. My client says that the judge said in open court and in
20 the presence of the jury and your presence that the Post
21 Office case had been a sham; does that ring any bells?
22 A. No.
23 Q. He said:
24 "The Post Office case was just as much of a sham as
25 its rebranded new image of the nation's most trusted
134

1 that something that you know?
2 A. No.
3 Q. There wasn't a review here, was there?
4 A. I don't recall.
5 Q. An acquittal in 2004, based, we say, on the Horizon
6 system not working at the branch, would have had
7 an impact on future cases going forward, would you agree
8 with that?
9 A. Yes.
10 Q. You didn't flag up the problems that Mrs McKelvey raised
11 with the computer system in your investigation report;
12 you didn't flag up the issue with Mrs McKelvey being
13 absent from the Post Office when one of the incidents of
14 theft was supposed to have taken place. In your
15 statement, you give a general apology to those who were
16 affected by the Post Office scandal. Do you have any
17 apology to make to Mrs McKelvey?
18 A. As I've said in my statement, I am devastated, actually,
19 by the way that this whole -- has been revealed.
20 I trusted the Post Office. It was the Government. I'd
21 worked for them all my life, practically. I just could
22 not believe the deceitfulness and I am so sorry for
23 anyone who was wrongfully prosecuted because of this
24 system.
25 Q. Coming to the end of my questions. You took a robust
136

1 line. We've seen in a document that you had a target in
 2 2013. Was there a target in 2004?
 3 **A.** No, I don't recall. I don't recall that at all.
 4 **Q.** You've said in your statement -- and this is my final
 5 question to you -- that you feel that your work has been
 6 tarnished because those higher up in the Post Office
 7 didn't tell you what was going on.
 8 **A.** Absolutely.
 9 **Q.** You've said that you would like the Inquiry to find out
 10 what went wrong and what happened?
 11 **A.** Yes, and I think it's gone on for far too long.
 12 **Q.** You named John Scott, earlier on in your evidence today,
 13 as someone who was saying that the Horizon system was
 14 robust in a conference. Are you able to assist the
 15 Inquiry by giving the names of anybody else who ought to
 16 have told you what was going on with the Horizon system?
 17 **A.** No, and whenever I say John Scott it is because he was
 18 Head of Security. Other people would have said similar.
 19 From the training school, we were told the Horizon
 20 system, but they always did emphasise Fujitsu, that
 21 Fujitsu had said that this system was 100 per cent
 22 reliable.
 23 **Q.** I've been asked -- sorry.
 24 **A.** I cannot put names because that would be -- I cannot
 25 recall for definite. I would know at conference, with

137

1 **SIR WYN WILLIAMS:** That's fine.
 2 Before you say what you want to say -- because you
 3 can have the last word here, Ms Winter -- does anyone
 4 else want to ask questions?
 5 **MS PRICE:** There are no other questions from Core
 6 Participants, sir.
 7 **SIR WYN WILLIAMS:** Right. Then please, Ms Winter, say what
 8 you want to say.
 9 **A.** I just want to say there, whenever we were talking about
 10 Mrs McKelvey, I read through all the core statements of
 11 anyone involved in Northern Ireland and I just wanted to
 12 point out where she had said that the person
 13 investigating had approached her twice after the
 14 investigation. I just want people to know, whenever
 15 I was involved in a criminal investigation, if
 16 a solicitor was involved, I was not able to approach
 17 anyone unless through their solicitor. So I -- that
 18 would not have been me approaching Mrs McKelvey after
 19 the investigation.
 20 **SIR WYN WILLIAMS:** Right. Is that it, Ms Price?
 21 **MS PRICE:** Yes, sir.
 22 **SIR WYN WILLIAMS:** Right, well, thank you, Ms Winter, for
 23 making yourself available to give evidence during the
 24 course of today. I'm grateful.
 25 I hope that those Core Participants who have

139

1 John Scott, that that would have been where we would
 2 have discussed or they would have had some programme
 3 about Fujitsu.
 4 **Q.** I have been asked to ask you one final question. As
 5 I said at the beginning, I have four clients who flew
 6 from Belfast yesterday, they're Maureen McKelvey,
 7 Deirdre Connolly, Katherine McAlerney and Heather
 8 Earley. They say that, collectively, they've spent
 9 64 years fighting for justice. You were involved in all
 10 of their cases. With that in mind, do you have anything
 11 that you want to say to them today?
 12 **A.** Yes, I was involved in their cases but I would like to
 13 think I did everything to the best of my ability.
 14 Information that I had not been received by the people
 15 and the executives from above; what I know now is
 16 completely different to what I knew then.
 17 **Q.** Just one final question I've been asked: are you going
 18 to say you're sorry to my clients?
 19 **A.** Of course I would say sorry to anybody who has been put
 20 through what I can only imagine is a nightmare, but
 21 I did not know of any problem with the Horizon system.
 22 Can I now say something?
 23 **SIR WYN WILLIAMS:** Have you finished asking questions,
 24 Mr Jacobs, first of all?
 25 **MR JACOBS:** I have and I'm sorry if I overran a bit.

138

1 travelled to London to be in person at the Inquiry have
 2 found today's proceedings informative and I wish them
 3 a good journey home. We'll reconvene again on Tuesday,
 4 when we will continue investigating events in Northern
 5 Ireland. I think that's correct, is it not?
 6 **MS PRICE:** That's correct, sir.
 7 **SIR WYN WILLIAMS:** Thank you all very much.
 8 **MS PRICE:** Thank you.
 9 (3.44 pm)

(The hearing adjourned until 10.00 am
 on Tuesday, 30 January 2024)

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140

I N D E X

Witness statement of JAMES McLERNON adduced 1	
SUZANNE WINTER (sworn)	2
Questioned by MS PRICE	2
Questioned by MR MOLONEY	120
Questioned by MR JACOBS	125

MR JACOBS: [6] 125/22 133/7 133/10 133/13 133/16 138/25	MR MOLONEY: [4] 120/8 125/9 125/13 125/19	MS PRICE: [26] 1/3 1/6 2/6 2/8 2/12 28/23 42/12 42/16 42/22 42/24 78/2 78/5 78/10 78/12 102/13 115/11 115/16 115/25 119/22 120/1 120/6 125/15 139/5 139/21 140/6 140/8	SIR WYN WILLIAMS: [34] 1/4 2/5 2/7 28/16 28/22 42/14 42/18 42/23 78/4 78/11 101/20 101/25 102/7 102/12 115/8 115/14 115/19 119/20 119/23 120/5 125/10 125/16 125/20 133/3 133/6 133/9 133/11 133/14 138/23 139/1 139/7 139/20 139/22 140/7	10.45 [1] 120/20 10/10/01 [1] 112/20 100 [6] 48/4 111/12 113/7 114/1 120/21 121/25 100 per cent [5] 9/11 9/12 36/16 122/4 137/21 11 [4] 14/25 15/1 19/22 62/4 11 years [3] 109/12 126/14 127/11 11,030.09 [1] 90/13 11.40 [2] 42/16 42/19 11.55 [2] 42/16 42/21 12 [2] 41/18 107/25 12.30 [1] 105/18 12.46 [2] 130/14 130/17 120 [4] 112/21 112/22 113/17 113/18 13 [1] 20/4 13 December [1] 65/8 136 [2] 22/11 22/11 137 [1] 22/14 139 [1] 22/11 14 [1] 112/15 15 [7] 14/24 15/2 27/24 31/24 37/3 65/5 80/15 15.51 [1] 131/10 154 [1] 66/1 16 August [1] 112/11 16 February [1] 65/11 16 January [2] 113/5 113/25 16 September [1] 103/21 166 [1] 67/21 168 [1] 68/9 169 [1] 68/15 17 [3] 17/12 47/9 55/22 17.1 [1] 65/6 17.17 [1] 131/14 17.52 [1] 108/2 18 months [1] 91/12 181 [1] 69/18 19 [3] 43/2 78/16 113/3 19.18 [1] 67/21 196 [1] 70/3 1969 [2] 65/7 103/16 1973 [1] 3/14 1976 [1] 3/16 1996 [1] 10/21 1997 [2] 3/25 4/6 1998 [2] 3/25 4/6 1999 [1] 65/5	2 2 January 2024 [1]	2/16 2 years [1] 67/20 2.00 [2] 78/5 78/9 20 [7] 20/3 52/18 61/11 82/15 82/16 113/4 115/18 2000 [5] 13/1 65/8 65/9 88/20 97/12 2001 [31] 4/14 6/17 7/1 7/16 9/7 9/17 10/5 11/23 11/25 12/15 13/11 29/14 29/18 30/1 65/5 65/19 65/25 73/11 74/1 79/2 89/9 89/14 93/6 95/2 97/4 97/13 103/19 108/2 113/16 119/1 131/1 2002 [10] 17/1 78/24 103/19 103/25 104/4 112/3 113/5 113/25 116/11 126/7 2003 [1] 124/11 2004 [16] 78/16 87/22 88/1 103/21 112/4 112/11 112/11 114/10 114/20 115/2 116/3 118/19 118/23 134/5 136/5 137/2 2005 [8] 29/21 65/11 100/6 123/16 124/12 125/5 125/7 125/8 2006 [3] 111/19 124/25 128/11 2007 [2] 111/19 125/6 2008 [3] 35/20 36/1 39/6 201.30 [1] 89/8 2011 [1] 5/6 2013 [2] 22/10 137/2 2014 [2] 5/10 22/10 202 [1] 71/6 2024 [3] 1/1 2/16 140/11 21 [2] 28/24 61/3 21 August [1] 103/19 21 December [1] 87/25 21 May [1] 130/19 213.45 [1] 88/21 22 [1] 113/15 22 July 2004 [1] 118/19 226.30 [1] 89/16 23 [3] 27/23 27/25 31/22 25 [1] 37/20 26 [5] 1/1 75/21 75/22 93/1 93/2 26 July [6] 65/9 65/19 65/25 84/13 84/14 93/6 27 [1] 13/25 27 December [1]	88/20 28 [3] 17/11 17/13 18/21 29 [5] 47/8 48/25 49/7 55/21 59/15	3 3.30 [1] 115/20 3.44 [1] 140/9 30 [1] 1/18 30 January [1] 140/11 304 [1] 130/11 31 [1] 1/25 31 January [2] 89/8 89/14 31 October [1] 131/1 32 [3] 130/23 130/25 131/23 33 [1] 1/25 34 [4] 43/1 43/3 45/3 82/17 35 [3] 43/20 45/3 45/11 36 [2] 52/11 52/18 37 [6] 50/10 59/22 61/10 61/11 87/23 128/8 39 [2] 28/23 28/24	4 4 April 2002 [1] 126/7 4 May [1] 108/2 4,623.48 [1] 103/17 4.4 [2] 88/6 88/8 4.5 [1] 88/17 4.6 [3] 37/22 88/6 88/23 4.7 [2] 39/24 89/5 40 [2] 2/19 128/24 41 [3] 31/19 60/18 61/3 43 [1] 129/23 44 [1] 128/8 47 [1] 88/7 48 [1] 109/4	5 5.10 [2] 91/7 94/9 5.21 [1] 94/19 5.25 [1] 94/14 5.4 [1] 90/2 5.5 [2] 90/2 90/11 5.6 [1] 90/24 50 [3] 75/23 104/2 104/3 51 [1] 90/2 52 [1] 104/12 54 [5] 91/19 92/24 93/2 93/4 105/6 59 [2] 94/13 133/17	6 61 [1] 95/21 64 years [1] 138/9 65 [1] 22/17 65 per cent [5] 23/9 23/12 24/4 24/14 25/14 660 [1] 69/21	7 70 [1] 118/11 700 [1] 65/12 71 [1] 50/9 721.62 [1] 90/19 76 [1] 107/17	8 8 o'clock [1] 68/5 8.30 [1] 104/16 86 [2] 130/11 130/13	9 9 o'clock [1] 68/5 94 [1] 65/20	A ability [9] 22/5 106/24 109/12 116/21 117/8 126/14 127/7 127/11 138/13 able [9] 27/18 64/21 64/23 109/25 111/5 129/4 129/15 137/14 139/16 about [60] 3/5 3/8 5/7 5/8 8/9 10/18 10/23 11/3 12/20 13/6 19/22 35/18 37/16 46/3 47/19 48/1 48/1 48/7 49/1 51/9 56/15 57/11 60/23 67/11 68/11 71/10 72/24 74/3 75/10 75/14 77/9 100/15 104/13 104/16 105/11 107/13 107/20 108/13 108/14 109/24 110/3 111/2 111/19 111/21 115/9 115/11 115/18 116/12 120/19 121/2 121/23 124/17 124/19 124/24 126/4 126/20 128/2 130/23 138/3 139/9 above [9] 8/19 10/12 16/5 81/13 84/4 89/10 90/12 94/19 138/15 absence [3] 6/13 88/25 97/15 absent [1] 136/13 absolutely [4] 21/25 45/22 135/11 137/8 acceded [1] 46/17 accept [4] 67/7 71/3
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A	acting [2] 79/20 87/15	after [36] 2/4 3/19 4/14 4/23 13/1 13/11 14/1 32/8 32/16 35/14 35/15 41/3 65/13 73/5 73/22 74/5 79/1 79/6 82/4 84/19 91/12 94/16 94/20 95/1 97/2 97/4 99/19 107/6 107/19 110/13 115/20 115/22 121/20 134/14 139/13 139/18	106/23 107/11 109/15 110/25 111/11 115/3 116/15 118/24 119/5 121/22 123/8 123/12 123/19 125/18 126/18 127/25 128/16 128/25 131/19 131/24 133/4 133/25 136/21 137/3 138/9 138/24 139/10 140/7	65/20 AMCL0000035 [2] 78/14 83/25 amended [3] 15/16 79/13 79/17 amendment [1] 81/7 amount [6] 45/2 46/4 69/23 88/9 89/15 113/13 amounts [3] 90/12 91/1 106/19 analyse [2] 7/18 87/16 analysed [1] 88/21 analysing [4] 6/4 6/6 6/9 7/14 analysis [4] 7/17 7/23 8/8 121/3 analytic [1] 7/21 Andy [2] 60/9 61/13 another [20] 5/3 8/12 10/5 16/8 41/3 41/18 58/2 79/22 79/24 79/25 90/16 90/16 90/21 90/22 98/18 98/19 98/24 112/7 112/7 115/11 answer [4] 7/24 51/6 132/21 133/14 any [101] 5/18 7/14 9/6 9/10 11/8 11/23 13/15 14/17 15/3 18/22 23/23 25/3 25/8 25/23 26/20 26/24 28/3 28/4 28/11 31/5 32/4 32/12 32/21 35/13 36/24 39/14 41/14 42/6 43/6 43/8 44/18 44/20 48/18 52/1 53/13 53/17 53/22 53/24 54/12 55/7 55/17 58/18 58/20 59/4 63/4 64/15 72/5 72/6 72/16 73/7 73/7 73/12 73/17 74/13 74/14 74/17 75/14 75/19 76/9 76/12 77/16 77/23 79/2 80/14 81/1 81/11 82/21 84/5 84/7 84/20 84/21 84/25 85/5 85/14 85/23 86/20 87/11 89/21 89/22 93/21 94/8 94/25 95/14 96/2 96/9 97/16 102/3 103/3 103/9 108/19 110/1 110/7 110/16 118/4 121/7 126/20 133/22 134/21 135/20 136/16 138/21 anybody [5] 124/15 124/19 130/21 137/15 138/19 anyone [17] 9/23
accept... [2] 82/24 119/15	action [2] 117/10 132/10	again [22] 11/17 16/4 16/11 27/10 46/13 48/23 49/5 49/23 55/1 55/7 68/1 68/6 76/19 86/11 89/5 106/5 108/18 110/1 126/25 131/14 135/15 140/3	allegation [1] 70/3 allegations [1] 84/9 alleged [5] 79/21 80/13 89/3 90/9 90/13 allocated [2] 32/19 63/21 allow [1] 89/20 allowance [5] 88/12 97/13 107/25 116/25 117/2 allowed [6] 44/1 45/1 45/24 46/1 46/11 57/8 allowing [1] 71/25 along [2] 63/20 100/10 alongside [1] 92/25 already [1] 127/2 also [32] 2/2 4/24 6/16 6/21 7/6 10/8 15/13 24/13 31/21 39/19 61/15 65/12 72/21 73/24 75/6 76/7 77/14 78/25 82/12 85/9 86/24 86/24 97/25 98/5 104/24 105/1 105/3 106/7 108/8 121/20 122/1 122/1 alteration [1] 81/6 altered [5] 79/13 79/18 115/3 115/5 121/6 although [5] 1/19 18/13 89/14 99/11 104/6 always [32] 15/24 16/11 18/19 21/23 23/10 23/19 34/4 34/6 34/15 34/16 36/20 46/7 48/8 56/7 59/17 62/9 63/9 63/9 66/21 70/22 76/8 77/15 81/19 86/8 87/3 105/25 106/3 106/17 107/8 110/11 110/18 137/20 am [13] 1/2 8/23 35/9 42/19 42/21 49/17 57/10 66/25 91/23 101/20 136/18 136/22 140/10 AMCL0000031 [1] 87/23 AMCL0000032 [1]	
acceptable [2] 70/24 71/2	actions [3] 80/3 81/4 117/15	against [9] 4/9 4/20 25/13 38/3 64/13 90/13 98/15 124/12 128/17 Agency [1] 118/25 agent [1] 51/2 agents [3] 4/11 19/24 27/21 ago [6] 57/24 67/13 67/20 74/9 92/12 95/19 agree [7] 29/9 30/15 66/7 76/16 80/21 121/9 136/7 agreed [2] 31/9 31/18 agreeing [1] 30/21 agreement [3] 31/8 31/10 31/12 ahead [1] 25/5 Alan [6] 51/13 62/12 65/2 65/3 65/22 124/24 albeit [1] 119/14 all [93] 6/3 10/23 10/24 11/4 12/11 13/22 16/21 18/2 19/10 22/1 23/4 23/18 24/13 25/21 26/4 26/22 34/13 34/24 36/9 36/16 36/24 37/1 41/6 42/4 47/11 49/10 49/22 51/24 53/15 54/2 54/11 56/18 58/4 60/16 63/7 63/17 63/19 64/25 67/6 67/18 68/4 69/15 71/11 73/16 74/6 75/5 79/21 80/7 84/25 85/5 85/13 85/14 85/16 86/14 87/21 91/10 98/3 101/7 101/10 101/11 102/19 104/21 106/3 106/4 106/5	access [11] 6/12 6/13 14/21 16/21 38/11 39/23 57/7 57/8 87/7 117/12 132/12 accessed [2] 111/9 111/22 accident [1] 129/6 accord [1] 29/22 according [3] 37/6 70/20 128/21 accordingly [1] 115/24 account [19] 1/22 31/22 69/21 69/22 70/5 70/21 81/21 82/13 85/16 86/14 105/9 105/12 105/15 106/8 106/10 108/3 113/9 116/13 128/9 accountant [1] 124/23 accountant's [1] 87/16 accountants [5] 94/9 100/4 100/21 121/12 121/24 accounting [18] 8/14 38/6 65/6 68/10 69/1 69/17 70/4 72/1 72/20 80/16 81/17 82/8 84/22 90/17 90/23 98/20 104/19 120/12 accounts [18] 38/3 67/24 68/20 70/1 70/17 70/25 71/2 71/9 71/18 71/22 72/4 72/6 80/2 81/3 81/15 84/16 85/2 121/14 accumulated [1] 19/10 accuracy [2] 96/9 96/15 accurate [2] 69/16 72/2 accused [3] 90/14 90/19 129/20 achieve [2] 23/2 24/15 acquittal [3] 132/23 133/2 136/5 across [2] 40/15 85/10 act [4] 10/21 65/7 103/16 125/23 acted [1] 51/23	
accepted [1] 80/14	activity [3] 22/18 25/9 50/21	admitted [1] 19/25	AMCL0000035 [2]	
accepts [3] 69/25 79/13 81/6	actual [11] 21/21 21/24 22/2 22/4 34/11 45/9 52/8 66/10 80/21 96/1 116/7	admission [1] 59/20	amended [3] 15/16	
access [11] 6/12 6/13 14/21 16/21 38/11 39/23 57/7 57/8 87/7 117/12 132/12	actually [16] 7/21 30/19 41/19 49/22 70/9 70/16 74/24 75/18 76/2 95/17 114/24 117/24 125/11 129/3 129/20 136/18	admissions [4] 56/7 59/16 78/21 117/6	amendment [1] 81/7	
accessed [2] 111/9 111/22	actuated [2] 80/3 81/4	Admissions/denials [1] 78/21	amount [6] 45/2 46/4 69/23 88/9 89/15 113/13	
accident [1] 129/6	add [1] 117/2	admitted [1] 19/25	amounts [3] 90/12 91/1 106/19	
accord [1] 29/22	adding [1] 96/6	adopted [1] 23/4	analyse [2] 7/18 87/16	
according [3] 37/6 70/20 128/21	addition [1] 6/24	advantage [1] 87/5	analysed [1] 88/21	
accordingly [1] 115/24	additional [8] 13/3 32/4 32/13 33/3 33/15 41/7 41/20 117/5	advice [4] 17/15 30/24 38/9 38/11	analysing [4] 6/4 6/6 6/9 7/14	
account [19] 1/22 31/22 69/21 69/22 70/5 70/21 81/21 82/13 85/16 86/14 105/9 105/12 105/15 106/8 106/10 108/3 113/9 116/13 128/9	address [1] 50/11	advise [3] 20/9 52/25 108/9	analysis [4] 7/17 7/23 8/8 121/3	
accountant [1] 124/23	addressed [2] 3/9 102/2	advised [8] 33/22 54/19 55/3 56/4 104/24 105/3 113/12 127/20	analytic [1] 7/21	
accountant's [1] 87/16	addresses [1] 94/15	advising [2] 33/6 126/22	Andy [2] 60/9 61/13	
accountants [5] 94/9 100/4 100/21 121/12 121/24	adduced [2] 1/5 141/2	affect [1] 102/9	another [20] 5/3 8/12 10/5 16/8 41/3 41/18 58/2 79/22 79/24 79/25 90/16 90/16 90/21 90/22 98/18 98/19 98/24 112/7 112/7 115/11	
accounting [18] 8/14 38/6 65/6 68/10 69/1 69/17 70/4 72/1 72/20 80/16 81/17 82/8 84/22 90/17 90/23 98/20 104/19 120/12	adequately [1] 41/21	affected [1] 136/16	answer [4] 7/24 51/6 132/21 133/14	
accounts [18] 38/3 67/24 68/20 70/1 70/17 70/25 71/2 71/9 71/18 71/22 72/4 72/6 80/2 81/3 81/15 84/16 85/2 121/14	adjourned [1] 140/10		any [101] 5/18 7/14 9/6 9/10 11/8 11/23 13/15 14/17 15/3 18/22 23/23 25/3 25/8 25/23 26/20 26/24 28/3 28/4 28/11 31/5 32/4 32/12 32/21 35/13 36/24 39/14 41/14 42/6 43/6 43/8 44/18 44/20 48/18 52/1 53/13 53/17 53/22 53/24 54/12 55/7 55/17 58/18 58/20 59/4 63/4 64/15 72/5 72/6 72/16 73/7 73/7 73/12 73/17 74/13 74/14 74/17 75/14 75/19 76/9 76/12 77/16 77/23 79/2 80/14 81/1 81/11 82/21 84/5 84/7 84/20 84/21 84/25 85/5 85/14 85/23 86/20 87/11 89/21 89/22 93/21 94/8 94/25 95/14 96/2 96/9 97/16 102/3 103/3 103/9 108/19 110/1 110/7 110/16 118/4 121/7 126/20 133/22 134/21 135/20 136/16 138/21	
accountants [5] 94/9 100/4 100/21 121/12 121/24	adjust [2] 69/21 113/19		anybody [5] 124/15 124/19 130/21 137/15 138/19	
accounting [18] 8/14 38/6 65/6 68/10 69/1 69/17 70/4 72/1 72/20 80/16 81/17 82/8 84/22 90/17 90/23 98/20 104/19 120/12	adjustment [1] 69/24		anyone [17] 9/23	
accounts [18] 38/3 67/24 68/20 70/1 70/17 70/25 71/2 71/9 71/18 71/22 72/4 72/6 80/2 81/3 81/15 84/16 85/2 121/14	adlist [6] 66/4 66/13 66/15 88/15 108/1 108/2			
accumulated [1] 19/10	adlists [1] 89/22			
accuracy [2] 96/9 96/15	admission [1] 59/20			
accurate [2] 69/16 72/2	admissions [4] 56/7 59/16 78/21 117/6			
accused [3] 90/14 90/19 129/20	Admissions/denials [1] 78/21			
achieve [2] 23/2 24/15	admitted [1] 19/25			
acquittal [3] 132/23 133/2 136/5	adopted [1] 23/4			
across [2] 40/15 85/10	advantage [1] 87/5			
act [4] 10/21 65/7 103/16 125/23	advice [4] 17/15 30/24 38/9 38/11			
acted [1] 51/23	advise [3] 20/9 52/25 108/9			

A	123/25 127/3 132/17 137/14 138/17 139/5 Area [4] 3/19 43/11 129/8 129/21 areas [2] 25/12 40/15 argument [1] 133/10 arise [1] 91/2 arisen [1] 89/23 arises [1] 88/11 arising [2] 72/20 96/2 arose [1] 27/13 around [8] 3/25 5/6 29/21 39/20 97/4 100/6 108/1 118/7 ARQ [23] 8/22 8/24 43/16 43/18 43/21 43/25 44/4 44/21 44/24 45/4 45/7 45/9 45/12 47/6 49/4 49/19 52/12 52/19 52/21 53/2 53/6 55/9 64/18 ARQs [5] 45/2 46/24 58/1 60/11 60/12 arrange [1] 57/17 arranged [1] 7/8 arrangements [1] 14/3 arranging [1] 63/12 arrive [1] 90/13 arrived [2] 80/7 104/16 as [158] ascertain [1] 20/1 aside [2] 70/20 74/18 ask [24] 21/4 23/21 23/24 35/18 49/5 67/21 71/7 91/14 92/9 92/10 92/22 94/2 109/7 121/23 122/1 125/10 126/4 126/20 126/25 133/1 133/11 134/3 138/4 139/4 asked [28] 21/3 33/4 34/4 34/15 43/9 49/24 53/23 74/3 75/18 87/11 92/11 92/14 92/17 93/22 94/4 95/7 95/8 95/13 104/18 111/2 114/23 123/1 123/8 126/9 131/7 137/23 138/4 138/17 asking [18] 2/14 3/5 3/8 8/23 23/19 24/2 30/17 33/15 49/17 51/16 51/25 74/15 74/16 83/7 83/9 128/20 130/18 138/23 aspect [1] 3/5 aspects [2] 6/3 12/2 assertion [4] 81/11 88/24 90/25 99/1 assessment [3] 101/6 101/9 101/11 assessments [1] 6/5	asset [1] 23/3 assist [7] 2/13 17/14 36/12 54/4 62/5 92/16 137/14 assistance [8] 56/6 57/5 65/18 120/11 120/15 120/16 122/5 122/10 assistant [2] 3/12 43/7 assisted [3] 40/9 63/3 98/12 assisting [1] 11/10 assists [1] 84/6 associated [1] 10/21 assumed [2] 124/1 125/16 assuming [2] 53/2 115/1 assumption [1] 59/19 assurance [1] 49/15 assurances [6] 47/13 48/10 49/1 49/18 49/21 76/25 assured [6] 47/12 49/11 76/8 77/15 77/23 86/9 assuring [1] 49/20 at [190] Atherton [1] 116/25 attached [3] 88/18 89/12 112/13 attend [1] 128/12 attendance [1] 20/6 attended [3] 12/13 47/21 134/4 attending [1] 12/4 attention [1] 11/10 attributable [1] 77/2 attributed [5] 43/8 76/11 76/14 77/18 77/21 attributing [5] 43/22 45/6 45/13 45/20 80/8 audit [20] 8/18 8/24 9/7 20/7 20/12 21/5 42/7 42/25 53/25 74/11 84/11 84/13 104/18 104/22 104/23 104/25 105/20 105/21 106/1 112/1 audited [2] 20/3 36/20 auditor [4] 3/23 36/25 104/15 104/22 auditors [2] 100/10 110/21 audits [1] 84/12 August [7] 103/19 112/4 112/11 112/11 114/10 115/2 118/23 August 2004 [2] 112/4 115/2	authored [1] 100/4 authorisation [1] 117/16 authorised [3] 32/1 35/13 43/16 authors [4] 89/6 90/3 94/17 121/18 automated [1] 66/7 availability [1] 117/14 available [28] 8/18 8/20 26/21 28/4 44/15 54/11 55/14 73/25 74/2 74/14 89/25 91/20 91/22 91/24 92/8 93/8 93/12 93/17 93/21 93/23 93/24 93/24 93/25 97/14 98/4 98/12 99/15 139/23 avenues [1] 51/24 average [2] 41/15 41/16 await [1] 20/12 aware [21] 9/4 10/11 11/13 21/15 44/16 57/10 62/23 71/8 71/12 71/12 71/14 71/16 71/21 74/1 81/21 82/13 85/16 86/14 103/3 103/5 119/13 away [5] 10/25 11/14 11/19 21/16 54/13	68/6 69/14 72/21 73/9 73/16 73/22 73/23 74/5 74/20 75/10 75/12 76/17 81/15 81/21 82/3 82/13 84/22 85/2 85/16 85/24 86/14 92/3 107/2 107/13 107/15 109/24 110/3 110/7 110/11 110/15 112/25 113/14 114/7 117/18 bandwagon [1] 121/9 bankrupt [2] 65/14 103/22 barrister [2] 101/15 134/9 based [10] 4/15 5/13 40/3 41/11 41/12 88/24 94/8 99/14 118/6 136/5 basis [7] 12/20 13/5 42/3 96/2 132/22 133/1 133/8 be [152] bear [1] 86/24 bearing [1] 6/7 became [4] 5/20 5/23 12/14 12/15 because [81] 7/24 9/10 19/14 24/23 30/24 31/1 31/10 34/13 34/15 35/9 38/6 41/23 45/18 46/7 46/10 46/14 48/19 49/20 54/8 55/12 58/13 59/8 59/12 59/20 61/22 63/17 63/20 64/3 67/2 68/3 70/16 71/9 72/4 72/7 73/9 73/11 73/20 73/25 74/25 75/8 76/17 76/24 77/22 83/17 87/6 93/20 94/11 95/8 95/11 102/16 104/19 105/18 105/24 106/20 107/15 108/10 110/9 111/9 115/21 117/24 119/18 122/13 122/18 122/21 123/6 125/4 125/5 127/1 127/20 128/1 128/14 129/5 129/16 130/15 131/12 132/20 136/23 137/6 137/17 137/24 139/2 become [3] 6/16 32/22 68/24 been [164] before [31] 1/6 4/3 4/5 28/7 30/5 31/11 35/16 40/23 41/7 46/24 47/4 47/6 53/2 53/3 55/7 67/11 75/25
----------	--	---	--	--

B	69/2 106/19 birthday [1] 4/13 bit [6] 43/3 44/13 69/3 69/15 127/9 138/25 bits [1] 58/9 blank [2] 36/2 89/4 bluntly [1] 102/3 body [1] 36/10 bold [2] 38/22 40/11 book [1] 63/10 bookkeeping [1] 91/3 both [7] 12/13 12/17 32/25 66/7 72/11 82/23 99/4 bother [1] 110/6 bottom [15] 16/6 19/21 20/5 21/18 21/23 31/20 36/7 61/12 66/18 78/21 93/2 93/3 109/19 116/16 116/17 box [3] 26/17 88/22 89/11 boxes [1] 22/13 branch [19] 3/16 8/13 8/20 17/23 18/10 20/3 20/21 34/9 53/14 65/4 68/10 73/15 94/16 95/2 113/4 114/6 121/21 129/22 136/6 branches [1] 120/12 brand [1] 135/1 break [5] 42/13 42/20 62/2 107/19 115/13 bring [4] 1/12 39/10 61/2 106/3 broadly [1] 75/12 broken [2] 89/11 90/10 Brookfield [5] 65/4 82/4 94/23 96/19 121/21 brought [3] 41/8 54/23 98/15 bullet [1] 26/17 bundle [2] 107/25 108/4 bundles [2] 108/10 131/20 burglaries [2] 4/25 41/5 business [15] 4/14 4/23 40/15 54/9 55/25 65/14 78/23 79/1 79/10 80/2 81/4 84/12 84/20 95/14 103/21 but [118] 1/12 1/16 4/4 4/23 9/5 16/11 16/17 21/6 23/23 24/1 24/2 26/11 30/24 31/21 32/22 34/8	34/14 35/23 40/2 40/24 40/25 41/8 41/13 43/15 44/8 44/19 44/24 45/8 45/17 46/6 46/13 46/17 46/25 47/3 47/18 48/12 49/21 50/17 50/21 51/13 51/23 53/1 57/24 58/4 58/20 60/13 60/15 60/16 61/24 64/16 64/23 65/10 69/15 70/17 71/17 71/24 72/20 73/6 73/14 73/24 74/10 74/18 75/3 75/5 75/11 76/8 76/15 77/15 79/9 81/25 82/20 85/9 86/19 87/11 88/15 91/24 92/13 92/15 93/7 96/11 97/2 97/17 97/22 98/4 100/12 100/20 101/17 102/5 102/7 102/8 102/18 103/6 105/18 106/6 106/17 106/23 107/2 109/22 111/17 113/18 114/11 114/22 114/24 115/22 118/14 122/1 124/22 125/13 125/16 126/4 127/12 129/4 129/17 130/13 134/13 137/20 138/12 138/20 buy [1] 106/8	95/17 98/1 103/9 103/12 104/4 105/8 106/7 108/16 108/22 109/15 111/9 111/14 112/7 114/5 114/10 115/19 116/1 117/19 122/18 123/19 125/10 126/18 130/10 131/22 131/25 132/8 132/16 133/11 133/23 138/20 138/22 139/3 can't [12] 14/16 34/13 36/12 48/12 57/14 74/9 92/15 93/15 94/6 109/5 114/23 119/14 cannot [15] 43/21 45/11 45/16 47/10 49/9 56/3 82/20 86/19 91/17 98/9 98/10 98/11 114/22 137/24 137/24 cap [1] 46/10 capable [2] 11/9 74/20 capacity [1] 40/6 capture [2] 67/2 67/11 cards [1] 4/13 career [2] 5/14 5/17 carried [8] 10/13 60/25 69/20 80/11 84/12 121/22 129/15 129/21 carry [1] 129/5 carrying [1] 71/18 case [97] 10/8 10/9 11/9 11/10 18/16 20/20 24/1 25/6 28/7 28/12 32/19 33/2 33/7 34/8 36/24 37/11 40/20 43/24 45/5 46/8 46/21 50/7 50/12 51/10 52/24 53/4 54/18 55/3 57/18 58/19 59/9 62/4 63/5 63/21 63/25 64/2 65/3 65/15 73/18 74/18 74/21 79/12 79/15 80/19 82/24 83/1 83/11 83/14 83/17 83/18 84/8 86/5 91/25 92/13 92/16 92/18 94/25 95/18 101/7 101/10 101/11 101/14 101/15 102/17 103/1 103/1 103/2 104/9 104/12 112/5 115/3 115/6 116/3 116/13 118/12 119/11 119/14 119/16 119/18 119/24 121/1 124/24 124/25 125/12 126/2 126/3 126/3 128/11 128/20	133/18 133/20 133/22 134/21 134/24 135/3 135/4 135/25 cases [52] 19/2 22/1 27/3 27/13 29/4 29/18 30/3 33/22 37/2 37/16 37/23 38/10 38/12 38/18 38/21 38/24 39/1 39/3 39/12 39/13 40/4 40/8 41/1 41/14 41/18 41/18 45/16 45/16 45/20 47/11 49/4 49/10 49/19 50/13 51/6 51/11 51/12 58/7 58/24 59/24 60/14 60/25 61/4 61/8 61/17 62/11 64/13 83/5 86/4 136/7 138/10 138/12 casework [24] 14/4 15/7 16/2 17/9 28/5 32/1 34/21 43/12 44/6 44/7 44/9 44/25 57/9 57/10 57/11 60/10 75/18 86/18 86/21 111/8 111/15 122/15 123/24 124/1 cash [44] 8/3 42/9 47/11 49/4 49/10 49/19 50/19 53/14 53/18 69/20 69/22 70/17 70/21 72/6 76/9 76/13 77/17 89/1 94/19 94/22 95/24 96/1 96/1 96/3 96/3 96/5 96/8 96/21 96/25 97/6 97/11 97/20 97/22 97/23 97/25 98/23 99/3 99/20 104/22 105/9 105/12 108/3 113/8 118/13 cast [2] 68/13 116/14 casting [3] 89/6 89/8 89/10 Castleton's [1] 124/25 cause [9] 50/17 73/17 76/13 79/24 90/16 90/21 98/18 107/3 121/24 caused [8] 51/4 52/7 72/21 79/24 80/4 81/12 82/8 112/25 causes [1] 50/20 causing [2] 74/20 85/24 caution [4] 15/8 20/9 20/16 21/2 ceased [2] 79/2 84/19 cent [14] 9/11 9/12 23/9 23/12 24/4 24/14 25/14 36/16 48/4 111/12 120/21 121/25
----------	--	---	--	---

C	Clanabogan [2] 104/19 119/6	committing [1] 19/25	95/20 95/21 99/23	continuum [2] 70/24
cent... [2] 122/4	clarification [1] 58/9	common [1] 71/17	100/22	71/2
137/21	clarify [1] 72/12	communicated [2]	conduct [5] 15/4	Contracts [9] 20/13
centre [3] 6/12 94/18	classed [1] 77/7	15/6 28/5	23/19 26/15 80/13	23/17 23/24 24/2
121/5	clear [6] 28/17 47/18	communication [3]	134/17	25/10 25/12 42/7
certain [13] 3/8 8/21	80/19 82/7 124/22	15/15 15/16 16/1	conducted [9] 15/4	53/22 95/11
24/20 33/12 44/1	128/17	community [2]	60/22 61/8 61/20	contrad [1] 90/12
44/15 45/1 45/24 46/1	clearly [6] 35/24	105/19 106/8	65/18 103/24 104/18	contrary [2] 65/6
46/4 68/3 76/5 79/14	72/21 82/2 96/20	company [2] 100/10	104/22 105/1	103/15
certainly [4] 42/14	99/11 111/8	100/25	conducting [4] 12/21	control [2] 25/2 25/4
42/18 68/19 86/20	client [3] 132/25	compared [1] 130/25	12/23 13/5 15/14	controls [3] 91/3
Chair [1] 78/4	134/2 134/19	Comparison [1]	conducts [1] 37/5	96/13 96/14
challenge [4] 50/11	client's [1] 133/7	95/25	conference [4] 47/24	convenient [2] 42/13
51/9 58/17 58/22	clients [2] 138/5	compensation [1]	48/14 137/14 137/25	78/2
challenged [2] 58/16	138/18	65/12	conferences [1]	conversation [1]
110/23	clipped [1] 108/1	complaints [1]	48/22	107/23
chance [1] 88/1	close [4] 18/1 18/6	114/18	confirm [3] 1/13 2/2	conversations [1]
change [9] 5/2 14/13	105/17 106/7	complete [2] 37/8	107/23	54/14
18/18 35/17 39/8	closed [6] 23/23 81/7	49/2	Connolly [2] 125/24	conviction [1] 65/13
39/18 39/19 39/20	105/2 105/2 105/18	completed [5] 13/20	138/7	copies [4] 64/9 64/10
67/3	113/21	37/7 62/17 105/3	Connolly's [1] 126/2	109/18 130/18
changed [3] 16/15	closing [1] 96/7	116/24	consider [8] 21/17	copy [4] 2/15 2/21
35/16 39/9	Closure [1] 113/20	completely [15] 9/16	32/3 32/12 76/10	31/4 31/16
changes [3] 14/3	Code [1] 37/6	10/3 25/11 34/6 41/24	77/17 77/20 94/24	core [8] 1/14 22/13
14/9 39/10	codes [4] 8/7 10/21	47/13 48/11 49/12	112/1	115/14 115/16 120/3
characterisation [2]	14/21 15/9	49/16 49/25 72/2 77/1	considered [2] 11/5	139/5 139/10 139/25
119/16 119/24	coincides [1] 72/8	86/10 129/17 138/16	20/22	correct [8] 15/11
charge [1] 132/25	coins [2] 112/19	completion [1]	Consignia [5] 81/21	15/25 83/10 108/6
charged [2] 26/15	113/23	107/22	82/12 85/16 86/14	108/12 113/18 140/5
46/2	colleagues [5] 73/7	complex [4] 38/4	135/5	140/6
charges [6] 46/3	74/4 74/8 87/8 110/16	38/17 38/20 54/9	consisted [1] 7/4	correctly [2] 34/18
65/10 80/6 80/15	collected [1] 11/4	computer [50] 8/12	consistent [2] 50/17	39/15
84/17 98/15	collectively [1] 138/8	16/10 16/18 26/9	99/7	corridor [1] 42/10
Charlie [1] 134/8	college [4] 6/21 9/14	34/16 34/17 44/17	constantly [2] 47/22	could [86] 1/7 2/19
check [3] 106/5	15/19 120/22	48/23 49/21 55/13	47/23	8/13 8/21 11/5 11/17
106/16 125/13	column [2] 89/15	56/16 57/2 58/14 59/5	consultation [2]	13/7 13/8 13/24 14/24
checked [3] 16/11	89/16	59/12 59/14 66/4	37/11 37/15	16/10 16/19 16/25
108/17 131/19	Com [1] 112/19	66/13 66/14 66/17	contact [14] 18/1	17/11 19/20 22/8
checking [2] 66/10	combination [2] 91/6	73/12 75/1 76/22	18/6 19/17 19/18 27/4	22/11 23/11 23/21
117/1	97/16	77/10 85/6 87/12	42/4 42/8 57/15 75/13	24/25 25/6 26/10
checklist [2] 54/4	come [21] 19/3 27/1	87/14 89/19 90/7	75/19 108/9 122/8	27/23 28/23 31/24
63/4	33/4 34/7 35/16 42/16	96/12 106/2 109/14	124/17 124/19	35/20 41/18 42/16
checks [1] 116/24	48/16 48/17 51/12	109/22 110/16 110/18	contacted [5] 53/18	43/1 43/15 43/23
Chesterfield [1]	57/18 58/6 73/4 78/5	111/4 111/5 111/12	75/16 75/17 108/11	44/17 44/23 45/18
104/20	79/8 87/20 101/1	117/18 117/22 117/23	110/8	47/3 47/8 50/5 50/9
Chief [5] 31/16 35/18	103/12 105/8 107/10	118/1 119/3 119/8	contacts [2] 23/1	50/17 50/24 52/8
36/4 36/6 36/17	125/14 130/14	121/19 126/17 126/21	61/13	55/21 58/17 59/11
Chivers [1] 36/6	coming [6] 74/16	127/13 128/3 136/11	contained [1] 133/23	61/2 63/9 63/9 64/4
choose [2] 91/14	105/19 105/22 124/8	computerised [1]	content [1] 109/17	65/19 71/19 75/6
92/21	135/22 136/25	91/4	contents [2] 1/20	75/21 76/14 78/13
circles [1] 119/20	commemorative [1]	concern [9] 50/20	2/25	82/15 83/24 86/23
circumstances [5]	113/23	50/20 51/18 51/24	contested [1] 65/10	87/8 89/18 94/13 97/8
9/7 17/21 19/15 19/16	comment [2] 89/25	73/17 74/19 74/22	context [2] 61/7	97/15 100/15 100/22
42/25	98/11	74/23 74/25	100/20	101/8 103/25 105/4
cite [2] 82/19 83/5	comments [1]	concerned [2] 22/1	continuation [3]	107/9 111/1 111/9
cited [4] 83/1 83/18	134/16	26/12	75/23 82/17 94/15	111/20 111/21 112/6
83/20 83/23	commission [1]	concerns [5] 75/1	continue [4] 102/4	115/7 116/19 118/17
citing [1] 83/8	20/18	75/8 93/7 94/6 100/14	102/10 102/11 140/4	121/8 121/21 122/8
claim [7] 88/10 88/19	commissioned [1]	conclude [4] 90/24	continued [6] 95/1	127/5 128/5 128/7
88/24 89/13 89/20	87/16	96/20 109/9 126/11	97/2 99/18 104/7	130/1 132/3 135/13
99/10 112/22	committal [1] 12/4	concluded [1] 77/1	121/20 122/6	136/21
claimed [3] 53/17	committed [4] 4/10	conclusion [4] 92/20	continuing [2] 23/24	couldn't [6] 24/23
89/15 99/15	31/8 38/2 38/6	116/23 118/2 118/5	94/21	31/1 44/22 46/9 46/12
		conclusions [4]	continuity [1] 33/24	107/3

C	customer [1] 38/3 customers [2] 6/10 8/5	decision [20] 28/5 28/8 28/12 28/13 33/8 38/13 43/12 44/4 44/10 46/20 49/3 49/14 49/18 52/13 52/22 53/5 55/8 56/2 101/18 102/5	departments [5] 17/25 18/3 18/5 18/7 18/9 departure [4] 94/20 97/2 97/4 99/19 depend [4] 21/5 50/4 50/7 51/20 depended [3] 24/23 41/16 41/19 depending [4] 16/16 26/1 50/1 50/2 deployed [1] 22/21 Derry [1] 19/8 describe [1] 89/7 describing [1] 61/19 Description [1] 113/6 designed [1] 95/24 detail [3] 56/9 98/3 125/14 detailed [6] 31/21 59/24 61/16 79/14 81/9 89/21 details [6] 43/9 84/13 84/14 84/15 84/19 84/21 detecting [1] 4/8 devastated [2] 135/18 136/18 develop [3] 29/9 30/15 68/19 developed [1] 35/16 development [1] 30/10 did [116] 5/18 7/21 7/23 8/21 10/6 12/9 12/16 13/15 13/17 13/18 14/4 17/5 18/14 18/18 19/14 21/17 21/23 21/25 24/16 24/17 24/20 26/18 27/13 30/9 32/15 32/22 32/23 33/16 33/18 41/6 41/21 41/23 45/25 46/15 49/20 50/20 53/9 54/10 55/6 55/24 56/22 57/7 57/20 58/8 62/6 62/12 62/15 62/20 67/5 67/16 68/16 69/21 72/12 73/6 73/16 73/21 74/23 75/2 75/13 76/10 77/17 82/10 83/18 85/23 86/3 86/11 89/18 91/14 92/1 92/21 93/6 94/24 95/4 101/6 101/9 101/10 101/13 102/9 102/11 102/13 102/19 102/25 107/7 107/11 109/11 109/25 111/24 112/1 114/23 114/24 117/23 120/10 121/23 122/1 122/3 122/4	122/11 122/17 122/23 123/18 123/22 124/3 124/6 124/15 124/19 125/6 125/7 126/13 127/10 127/17 129/3 129/12 129/16 137/20 138/13 138/21 didn't [36] 6/17 18/19 25/3 25/16 25/17 26/11 30/11 34/22 44/25 44/25 58/16 58/22 64/20 72/22 77/20 82/9 83/20 91/24 92/10 92/12 94/2 94/6 102/8 107/8 109/14 110/13 122/15 126/18 126/20 127/14 132/19 132/21 132/23 136/10 136/12 137/7 differed [1] 61/6 difference [3] 89/8 89/11 102/3 differences [6] 89/6 94/20 97/3 99/2 99/7 99/18 different [20] 8/7 8/11 13/22 15/8 15/12 15/22 15/23 24/5 25/11 38/7 41/24 42/11 50/16 51/23 60/15 60/23 106/2 129/17 131/11 138/16 differently [4] 8/12 130/24 131/5 131/24 differing [1] 96/11 difficult [2] 41/16 134/2 difficulties [8] 73/9 81/15 82/8 85/2 94/21 96/20 97/6 110/15 difficulty [2] 76/5 89/7 dim [1] 130/2 direct [15] 19/16 19/18 37/13 37/16 38/25 49/2 49/17 57/15 76/12 79/2 84/20 99/10 133/17 133/19 133/22 directed [2] 39/14 127/20 directly [5] 37/12 39/4 39/12 45/1 99/21 Director [5] 29/19 29/25 31/13 63/16 122/19 disappeared [1] 6/15 disclosable [1] 63/14 disclose [5] 59/1 59/11 64/16 64/25 87/14 disclosed [12] 1/14 59/6 59/9 62/22 84/6 84/7 84/9 101/5
counted [1] 118/7 counter [10] 3/12 3/17 8/20 76/7 76/10 77/1 77/14 77/17 77/20 108/5 counterfoil [1] 89/1 countries [1] 106/9 country [1] 105/19 couple [2] 27/6 95/13 course [19] 1/22 2/7 3/7 6/11 7/6 11/18 28/9 34/8 52/13 52/14 52/22 55/10 61/3 73/4 101/17 122/3 133/10 138/19 139/24 court [25] 1/9 12/4 12/4 44/21 57/18 58/7 59/25 61/17 62/5 63/5 63/23 63/24 63/25 64/17 64/22 101/19 124/25 128/11 128/12 128/15 129/14 133/19 134/6 134/19 135/14 courts [2] 29/3 29/11 cover [3] 4/24 40/8 113/13 covered [5] 6/3 7/1 10/5 47/16 130/21 covering [8] 12/10 16/23 78/15 91/16 92/23 112/9 116/1 116/5 create [1] 99/5 created [4] 66/8 97/22 97/25 98/23 Credence [11] 43/15 43/24 44/16 44/17 44/20 44/22 44/23 64/12 64/15 64/15 64/19 credibility [1] 84/7 Crime [1] 35/25 criminal [36] 5/19 5/19 10/20 12/6 12/10 15/9 19/4 19/25 20/19 23/15 23/17 23/22 25/6 25/8 25/12 27/20 28/14 29/18 35/19 36/6 36/8 36/14 36/20 37/2 38/1 38/8 38/12 42/2 63/10 70/9 71/8 102/14 102/16 103/13 135/24 139/15 criminality [1] 72/16 criteria [1] 37/1 critical [1] 134/16 Crown [10] 3/16 18/11 19/1 37/6 43/7 80/14 81/1 83/19 87/4 103/6 current [2] 70/13 96/24	D daily [3] 27/4 42/3 88/15 damage [1] 38/1 danger [1] 71/18 data [62] 6/4 6/6 6/6 6/10 7/14 7/17 7/17 7/25 8/2 8/3 8/8 8/15 8/18 8/19 8/22 8/24 8/25 9/4 9/7 42/25 43/13 43/19 43/21 44/5 45/4 45/12 45/18 47/10 49/4 49/9 49/14 49/19 52/12 52/15 52/19 52/21 52/25 53/2 53/6 55/9 55/18 56/6 56/19 56/20 58/24 59/16 64/12 64/15 64/19 73/5 87/17 91/19 91/21 92/8 93/8 93/12 93/17 94/11 94/18 96/14 96/15 112/1 date [7] 5/2 65/24 104/4 108/2 108/17 116/9 116/10 dated [10] 2/16 17/1 36/1 78/16 87/21 87/25 112/11 116/3 118/19 130/19 dates [1] 125/1 dating [1] 31/5 Dave [1] 124/14 Davies [1] 113/21 day [5] 129/5 129/13 130/5 134/4 134/5 days [5] 27/6 99/17 105/21 128/21 129/2 deal [9] 1/7 20/2 31/19 40/4 41/8 44/25 57/13 61/4 121/6 dealing [6] 18/9 34/16 41/14 50/8 52/19 85/19 deals [1] 37/20 dealt [5] 32/25 37/23 38/2 57/10 60/8 Dear [1] 112/18 debate [1] 121/2 deceitfulness [1] 136/22 December [8] 5/10 65/8 87/21 87/25 88/20 97/12 116/10 116/10 December 2014 [1] 5/10 decide [1] 38/10 decided [2] 47/1 101/17	decisions [2] 28/4 63/14 declarations [2] 8/4 53/15 deducting [1] 96/7 deemed [1] 78/24 defence [17] 11/10 64/6 78/13 78/17 79/5 82/24 83/11 83/13 83/21 83/25 84/3 84/6 101/22 118/15 121/4 121/7 122/21 defendant [25] 79/2 79/13 79/17 79/23 80/1 80/4 80/9 80/9 80/13 81/1 81/6 81/11 81/14 81/20 81/22 81/24 84/5 84/16 84/19 85/1 85/7 85/9 85/12 85/17 86/15 defendant's [2] 79/12 79/15 deficits [2] 96/4 96/25 definite [3] 43/21 45/12 137/25 definitely [1] 135/21 defrauding [1] 121/15 Deidre [1] 125/24 Deirdre [1] 138/7 delay [3] 37/14 38/18 38/24 delayed [1] 46/7 deleted [1] 91/13 deliberate [2] 117/10 132/10 deliberately [4] 97/21 97/24 98/23 128/1 delivered [6] 11/23 11/23 12/2 53/19 54/16 103/20 deliveries [1] 118/13 delivering [3] 9/18 9/24 10/2 demand [1] 40/16 demonstrate [1] 21/21 denials [1] 78/21 denies [5] 79/17 79/20 79/23 80/4 80/19 denying [1] 72/16 department [9] 18/15 18/18 18/19 27/2 29/19 29/25 40/23 40/25 42/9		

D	28/17 28/18 30/18 31/1 34/9 37/15 43/3 44/25 45/17 51/11 52/4 52/11 52/21 53/16 57/24 58/1 58/5 60/6 60/13 64/8 66/7 67/7 70/18 70/24 71/2 71/14 71/23 72/25 73/21 73/24 74/10 76/11 76/21 80/6 80/23 82/19 82/21 82/24 83/4 87/13 87/18 89/9 89/17 90/7 91/19 91/20 92/15 93/8 93/12 93/17 93/22 95/4 100/2 100/8 100/14 100/21 105/11 105/20 105/21 105/22 105/24 106/1 106/17 106/24 106/25 108/19 109/11 109/14 112/3 117/17 117/17 118/16 119/10 119/15 122/13 123/6 125/11 126/13 126/18 127/17 127/21 128/1 129/3 129/25 130/8 133/22 134/4 134/7 134/10 134/13 134/14 135/2 135/6 135/9 135/11 135/15 136/16 138/10	doing [21] 12/24 12/25 26/12 31/1 44/19 47/4 63/6 66/9 70/16 70/23 88/3 94/10 95/17 105/9 105/24 106/21 109/12 118/9 118/10 126/14 127/11 don't [35] 14/6 14/8 19/12 24/11 25/25 44/14 46/3 52/10 74/24 75/7 83/3 91/24 92/25 100/18 100/18 104/2 105/18 106/25 112/3 114/13 115/5 119/12 119/23 121/2 124/21 125/16 126/7 130/9 133/10 134/12 134/18 135/17 136/4 137/3 137/3 done [26] 8/14 13/24 14/11 22/4 26/2 26/10 29/13 68/2 102/23 109/13 109/14 110/25 111/20 115/8 116/20 117/7 126/15 126/18 127/6 127/12 129/1 130/3 130/4 131/11 131/24 132/18 doubt [1] 130/5 down [46] 15/1 19/22 23/23 26/21 27/1 31/11 31/25 36/5 42/10 43/3 50/14 51/24 55/23 66/25 67/4 68/13 68/17 71/6 73/20 78/19 80/17 84/2 84/17 87/24 88/7 88/7 89/11 90/10 97/8 98/1 103/12 104/13 106/10 107/20 108/14 109/3 112/12 113/5 116/4 116/8 116/12 116/14 116/16 117/3 130/23 132/8 downs [1] 92/2 DPP [10] 30/5 35/2 35/5 35/8 35/13 39/16 54/25 62/9 62/10 123/1 draw [1] 11/8 dreadful [2] 67/1 128/15 due [11] 1/22 3/7 34/8 73/4 88/11 90/6 107/16 113/8 117/10 121/18 132/10 Dungannon [1] 128/11 Dunks [2] 60/9 61/13 during [16] 1/23 6/11 11/5 13/3 15/5 47/14 73/20 76/4 77/5 92/1 93/6 97/1 97/12	104/23 110/10 139/23 duties [4] 10/13 10/15 10/18 23/18 duty [5] 10/23 11/3 11/13 11/18 11/20	15/20 16/5 19/3 40/3 41/12 41/13 41/25 42/11 61/6 English [1] 37/5 enough [3] 74/7 106/20 133/14 enquiries [10] 13/23 22/21 34/11 73/6 73/7 74/4 86/3 86/7 86/12 105/3 enquiry [2] 26/22 95/16 ensure [8] 13/20 22/16 22/19 23/4 36/16 36/25 54/10 63/4 ensured [2] 26/20 27/5 Ensuring [1] 22/23 enter [1] 111/24 entered [1] 50/16 entering [2] 66/15 118/8 entire [3] 64/1 64/3 64/5 entirety [1] 2/3 entries [12] 53/13 62/25 98/3 98/9 98/14 99/5 99/9 99/10 99/17 113/5 121/13 121/18 entry [7] 20/11 89/20 90/6 98/6 113/5 113/15 113/25 envelope [1] 108/5 equal [1] 88/15 equalling [1] 88/13 equipment [2] 81/18 82/9 equivalent [1] 15/11 er [1] 70/15 erm [5] 67/4 70/22 71/11 71/16 72/10 error [15] 50/17 50/20 76/14 81/19 82/12 85/8 97/19 109/13 109/22 110/16 112/25 117/11 117/18 126/17 132/11 errors [16] 8/15 51/15 68/10 69/1 72/20 76/6 80/8 80/12 81/22 82/14 84/22 85/17 86/15 99/8 99/8 131/17 especially [1] 111/3 essence [4] 64/1 107/11 118/11 119/9 establish [4] 22/4 22/5 62/2 70/24 established [4] 20/19 22/2 29/21 68/18 establishment [1] 35/3 even [9] 1/22 32/16
disclosed... [4] 101/17 101/21 101/22 101/23 disclosing [1] 102/1 disclosure [27] 10/6 10/9 10/16 10/19 11/6 13/16 33/3 53/5 62/3 62/6 62/11 62/15 62/17 62/22 62/24 63/3 64/13 64/17 84/2 84/10 85/19 112/14 118/20 118/22 118/24 119/5 119/9 discovered [2] 82/1 85/10 discrepancies [27] 51/20 66/3 72/13 72/20 76/10 76/13 77/17 94/16 96/2 96/23 97/22 99/21 114/7 114/8 114/19 115/4 116/20 117/9 118/14 119/17 119/18 121/6 121/20 127/6 131/25 132/9 132/18 discrepancy [7] 43/8 45/6 89/3 89/23 113/6 113/7 114/1 discuss [6] 27/13 32/4 32/12 74/7 87/8 110/14 discussed [13] 16/16 54/17 55/3 59/1 86/24 87/1 101/4 101/14 101/15 110/18 110/19 110/22 138/2 discussing [3] 68/11 77/4 122/19 discussion [5] 56/15 68/10 68/15 100/14 100/21 discussions [1] 115/17 dishonestly [3] 79/18 90/20 98/17 dishonesty [10] 50/24 51/17 76/8 77/15 79/19 80/20 90/15 93/7 107/16 121/7 dismissed [1] 72/11 distinct [3] 10/11 10/13 10/15 distribute [2] 64/11 64/11 do [123] 1/19 2/9 2/17 2/21 4/6 5/2 6/6 10/15 10/18 10/23 11/2 11/3 11/8 11/12 14/10 17/7 18/3 21/23 24/5 24/7 24/10 26/14 27/17 27/18 27/19	dockets [2] 88/8 88/10 dockets/foils [2] 88/8 88/10 document [27] 16/23 17/1 17/5 17/7 17/8 22/9 27/1 35/23 37/3 37/20 65/20 66/1 78/17 84/1 87/23 90/22 93/1 94/13 98/19 103/12 104/2 107/17 126/7 128/9 132/6 132/7 137/1 documentation [10] 81/7 84/25 85/5 85/14 86/12 89/22 112/9 112/13 114/9 114/10 documents [24] 13/21 16/13 33/12 62/17 62/21 66/4 66/7 66/12 76/6 79/14 79/18 88/2 90/17 109/18 110/5 112/4 112/10 114/17 114/25 118/22 121/6 130/12 133/24 133/25 does [10] 5/6 29/21 36/12 36/17 68/8 80/15 110/13 134/21 135/20 139/3 doesn't [6] 67/23 68/7 70/1 80/20 106/3 113/1	each [7] 27/6 44/1 45/19 88/15 91/11 98/5 106/12 Earley [2] 126/1 138/8 Earley's [1] 126/3 earlier [10] 4/6 24/5 31/25 47/16 51/11 59/1 63/6 114/20 118/23 137/12 easily [3] 33/13 54/7 87/8 Easter [1] 108/11 educating [1] 25/20 effect [5] 90/12 90/19 114/15 121/15 127/13 effectively [3] 18/15 22/21 129/19 efficiency [1] 38/23 eg [2] 17/24 23/2 eg monetary [1] 23/2 eg the [1] 17/24 either [5] 2/1 38/9 102/1 110/14 125/15 elapse [1] 91/16 elements [2] 22/20 38/5 else [9] 26/12 74/23 109/8 110/17 126/10 131/11 132/18 137/15 139/4 else's [1] 26/10 email [1] 60/11 emphasise [1] 137/20 emphasised [2] 48/6 48/8 employed [1] 129/11 employee [1] 51/2 employees [8] 4/11 19/24 27/22 38/3 43/7 64/14 86/1 120/10 employment [3] 3/16 38/11 97/2 enable [1] 37/11 encountered [1] 119/6 end [12] 8/14 24/17 42/12 98/1 105/9 106/15 109/19 126/6 126/9 132/7 135/22 136/25 ending [3] 88/20 89/13 130/25 engagement [2] 22/20 22/23 England [10] 15/10		

E	11/21 13/7 14/13 16/23 19/6 35/17 39/17 73/14 88/18 except [2] 58/4 61/9 exception [2] 60/20 61/20 excess [2] 50/19 52/1 Excuse [1] 133/11 executives [3] 48/15 48/18 138/15 existed [1] 122/15 existence [2] 91/1 121/9 existing [1] 40/6 expanded [1] 4/24 expansion [1] 5/4 expect [3] 105/23 107/3 107/10 expectation [1] 51/17 expected [2] 51/3 105/24 expecting [1] 52/6 experience [3] 5/19 95/11 128/15 experienced [9] 52/6 73/9 81/14 82/3 85/9 85/11 85/25 94/22 95/1 experiencing [5] 20/21 73/8 81/23 81/25 86/16 expert [12] 9/5 56/1 56/3 56/10 58/14 59/23 59/25 60/6 60/19 60/24 61/15 100/9 experts [1] 122/7 explain [11] 7/25 20/8 22/6 23/13 44/13 51/3 51/18 51/21 51/25 52/2 67/23 explained [7] 50/25 71/19 82/11 97/15 100/12 105/1 120/21 explanation [8] 20/14 20/25 21/7 50/22 52/1 89/17 93/11 117/4 explanations [1] 54/12 expressing [1] 85/18 expressly [1] 127/15 extended [2] 11/15 11/20 extensive [1] 64/4 extent [3] 8/21 79/15 81/8 external [1] 4/8 extra [1] 39/14 extremely [1] 89/19 eye [2] 68/13 116/14 eyes [1] 128/17	F face [2] 42/4 42/4 fact [6] 97/20 97/23 98/2 98/8 104/9 132/17 factors [2] 91/6 96/11 facts [1] 20/1 fair [1] 130/7 false [5] 38/5 65/6 70/4 70/5 80/15 falsified [1] 98/19 falsifying [5] 71/9 71/22 72/3 90/17 90/22 far [7] 22/1 57/10 103/3 106/25 115/13 115/17 137/11 fault [3] 57/3 81/17 117/24 faults [4] 82/3 85/8 85/9 85/10 feature [1] 60/19 February [5] 65/11 70/13 78/24 124/12 125/5 February 2002 [1] 78/24 Federation [1] 105/5 feel [6] 25/7 34/14 34/22 41/21 58/16 137/5 felt [4] 24/12 33/11 42/4 101/16 few [3] 19/2 41/7 43/15 fictitious [1] 99/5 fieldwork [2] 37/11 40/2 fighting [1] 138/9 figure [10] 24/9 25/3 68/20 69/20 80/7 88/9 90/14 113/17 113/18 113/21 figures [3] 25/18 69/25 72/10 file [25] 28/2 28/6 31/11 32/2 32/6 33/10 33/13 39/15 54/3 54/15 56/14 63/19 63/25 64/2 64/3 64/5 64/9 87/2 103/1 103/1 103/2 114/20 116/4 123/3 123/25 files [12] 29/10 36/24 37/7 37/9 37/12 37/14 38/14 123/8 123/8 123/13 123/19 123/25 filtered [1] 103/7 final [7] 1/16 20/12 72/1 130/22 137/4 138/4 138/17 Financial [1] 22/24	financially [1] 78/24 find [6] 57/20 107/3 109/17 111/10 112/13 137/9 findings [2] 84/13 122/5 finds [1] 134/2 fine [3] 69/14 102/12 139/1 fined [1] 65/11 finish [3] 115/9 115/20 115/23 finished [2] 124/13 138/23 first [41] 5/20 18/2 22/12 22/13 26/17 29/13 29/14 34/19 34/19 48/24 49/7 49/13 56/4 63/12 66/24 67/8 67/10 68/3 73/14 73/15 78/14 78/21 79/11 87/21 101/7 101/10 104/6 104/7 106/4 107/9 107/19 109/25 110/2 111/6 115/2 120/6 120/10 120/18 120/19 126/6 138/24 FIs [1] 22/23 Fiscal's [1] 37/8 fit [1] 36/17 five [4] 25/1 31/25 41/17 115/11 fix [1] 111/5 flag [3] 124/3 136/10 136/12 flagged [2] 124/7 124/20 flawed [1] 90/25 flew [1] 138/5 flexible [1] 40/13 flown [2] 27/8 27/11 focusing [1] 91/7 foils [17] 19/9 66/10 76/22 77/6 77/12 88/8 88/10 88/13 88/16 108/1 108/4 108/10 108/16 108/18 108/23 118/7 118/13 follow [14] 11/13 11/18 33/16 33/25 36/12 56/5 56/8 57/4 57/20 57/21 58/10 84/4 102/7 110/13 followed [1] 15/10 following [15] 2/9 6/14 28/1 39/5 43/19 44/2 45/8 90/8 97/16 98/16 98/25 106/23 107/19 112/2 119/7 follows [1] 96/22 foreign [1] 106/9 forensic [8] 87/16 94/9 100/4 100/9	100/20 121/12 121/24 124/23 foreword [2] 36/5 36/17 forgive [1] 77/22 form [1] 71/24 formal [5] 15/14 20/17 20/20 21/2 21/11 formalises [1] 40/13 formally [1] 31/8 format [3] 85/1 85/6 85/15 forms [3] 15/13 15/23 15/25 forthcoming [1] 57/17 forthwith [1] 84/9 forward [6] 13/21 28/8 35/9 35/11 86/20 136/7 forwarded [6] 28/2 37/7 37/9 38/15 63/19 117/15 forwards [1] 112/15 found [10] 1/11 40/5 56/8 58/10 70/14 70/18 87/13 103/20 108/4 140/2 four [9] 20/4 24/8 55/22 64/9 64/10 68/17 125/23 134/5 138/5 four years [1] 24/8 four-day [1] 134/5 franchise [2] 81/16 85/3 franchises [1] 85/11 fraud [5] 18/10 22/16 23/9 23/12 43/5 fraudulent [1] 38/5 Frederick [1] 65/23 Friday [2] 1/1 115/9 friend [2] 20/10 104/15 front [4] 2/16 35/22 87/25 121/5 FT [1] 108/16 Fujitsu [74] 8/19 8/25 9/8 9/10 9/23 10/2 11/16 11/21 19/12 19/14 19/17 34/4 34/5 34/7 34/20 34/24 43/1 44/2 44/15 45/1 45/24 47/10 47/12 47/17 48/1 48/8 48/22 49/9 49/11 49/16 49/25 50/3 52/20 55/20 55/24 56/2 56/8 56/11 56/17 57/1 57/7 57/9 57/12 57/14 57/15 57/19 58/24 59/23 60/9 60/20 60/24 61/14 61/15 73/5 74/2
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<p>F</p> <p>Fujitsu... [19] 75/9 86/9 91/10 91/13 94/12 110/11 111/2 112/1 122/7 122/9 122/11 122/13 122/16 122/22 122/25 125/12 137/20 137/21 138/3</p> <p>Fujitsu's [1] 57/5</p> <p>full [11] 10/6 22/23 64/1 79/15 84/11 84/13 84/14 84/15 98/12 127/14 128/12</p> <p>fully [2] 99/22 101/5</p> <p>function [3] 36/1 36/13 37/17</p> <p>funds [1] 23/5</p> <p>further [23] 4/23 23/23 32/21 33/17 33/19 34/10 43/17 54/20 54/21 54/22 55/7 58/2 59/20 64/17 79/20 80/11 84/5 89/25 98/11 112/4 112/10 112/13 116/24</p> <p>Furthermore [1] 99/14</p> <p>future [4] 47/21 50/13 51/11 136/7</p>	<p>127/14 136/15 139/23</p> <p>given [21] 5/24 9/6 14/17 21/8 25/25 26/8 30/23 35/8 39/13 47/13 49/1 49/15 60/12 64/10 75/10 76/25 80/8 88/9 109/22 114/9 120/3</p> <p>gives [1] 105/15</p> <p>giving [4] 48/22 134/12 134/13 137/15</p> <p>Glasgow [1] 27/12</p> <p>glitches [1] 75/4</p> <p>go [49] 16/9 16/19 19/20 25/5 25/9 26/11 26/21 31/1 33/24 34/21 35/8 36/4 39/22 42/6 44/17 44/23 44/24 51/24 52/17 53/12 58/22 61/23 67/16 72/1 86/22 89/5 94/13 105/11 106/2 106/4 106/14 106/16 111/5 115/21 123/8 123/20 126/24 126/25 128/5 128/7 130/10 130/20 130/22 131/2 132/3 132/7 132/13 132/19 132/24</p> <p>goes [4] 82/12 108/13 113/22 131/18</p> <p>going [52] 12/4 23/23 25/1 25/2 37/20 39/12 43/24 45/8 46/21 49/5 50/13 64/22 66/1 67/21 68/9 70/3 70/12 70/21 71/6 73/14 75/3 78/16 79/11 80/17 81/10 88/6 89/4 90/2 91/7 93/4 95/14 97/8 104/12 105/6 107/17 108/9 112/15 113/15 116/7 116/12 116/14 116/16 119/20 125/17 126/25 134/3 134/6 135/20 136/7 137/7 137/16 138/17</p> <p>gone [9] 22/7 24/1 52/24 54/17 75/16 95/9 112/19 114/20 137/11</p> <p>good [14] 1/3 2/12 25/20 35/22 46/16 49/22 69/5 78/10 87/12 113/7 113/9 114/2 128/14 140/3</p> <p>got [17] 24/24 39/11 47/4 47/7 50/3 54/22 55/6 57/12 58/21 62/9 67/1 73/21 106/12 122/25 131/17 131/23 131/23</p> <p>governing [1] 15/3</p> <p>Government [2]</p>	<p>111/24 136/20</p> <p>grade [1] 18/14</p> <p>grant [1] 2/9</p> <p>grateful [2] 132/5 139/24</p> <p>great [2] 130/17 132/6</p> <p>Green [1] 103/1</p> <p>Groogan [3] 105/20 119/2 129/7</p> <p>grounds [1] 13/6</p> <p>group [6] 35/24 35/25 37/17 89/6 89/7 89/10</p> <p>grouping [2] 88/12 88/13</p> <p>guessing [1] 48/19</p> <p>guidance [10] 9/6 13/15 14/20 15/3 15/16 15/17 15/18 18/22 63/4 63/11</p> <p>guided [1] 33/11</p> <p>guidelines [2] 54/4 54/6</p> <p>guilt [5] 11/14 11/19 21/17 54/13 117/6</p> <p>guilty [7] 11/1 65/11 103/20 125/5 134/15 135/7 135/10</p>	<p>68/18 68/19 70/12 80/7 83/23 87/11 89/1 89/16 89/23 90/14 97/10 97/18 97/19 97/21 97/25 98/2 98/5 98/25 108/22 113/21 114/1 117/6 117/7 117/13 131/19 132/14 136/19 137/5 138/19</p> <p>hasn't [1] 24/1</p> <p>have [337]</p> <p>haven't [2] 125/13 125/15</p> <p>having [19] 5/10 10/5 16/17 25/20 29/21 42/6 52/15 57/15 76/5 76/15 76/17 79/2 82/23 83/10 84/20 100/2 109/24 110/3 119/13</p> <p>he [93] 13/13 13/15 13/16 13/17 13/18 13/19 41/11 41/12 48/20 54/19 58/6 63/17 65/5 65/10 65/12 65/13 66/23 67/13 68/7 68/8 70/1 72/17 72/18 72/19 72/21 72/22 73/15 73/21 73/21 73/23 75/12 76/4 76/6 76/7 76/21 77/5 77/6 77/6 77/9 77/11 77/14 77/14 79/5 79/6 79/8 79/13 79/17 79/18 79/20 79/20 79/23 80/4 80/5 80/19 80/20 81/12 81/14 81/16 81/16 81/18 81/24 82/3 82/3 82/4 82/5 82/6 82/7 82/7 82/9 82/9 82/10 82/11 82/12 83/1 83/2 83/14 83/20 85/3 92/2 93/6 93/10 94/6 95/1 99/11 100/25 101/1 105/21 121/15 129/8 129/9 129/16 134/23 137/17</p> <p>he'd [1] 54/21</p> <p>he's [1] 71/4</p> <p>head [17] 28/3 28/9 28/16 28/17 28/20 38/14 48/15 48/20 102/21 102/25 103/7 111/25 123/16 135/14 135/19 135/24 137/18</p> <p>heading [4] 51/8 88/8 90/3 91/8</p> <p>health [2] 13/3 128/14</p> <p>hear [3] 1/3 42/22 78/10</p> <p>heard [4] 5/3 75/3 124/25 135/23</p>	<p>hearing [2] 2/4 140/10</p> <p>heart [1] 119/25</p> <p>Heather [2] 125/25 138/7</p> <p>heavily [1] 118/12</p> <p>held [7] 3/11 3/22 10/11 43/5 91/12 118/24 135/14</p> <p>Hello [1] 42/22</p> <p>help [10] 7/3 30/3 31/7 36/9 41/23 62/6 65/3 77/11 81/24 117/19</p> <p>Helpdesk [3] 43/10 53/20 112/22</p> <p>helped [1] 30/5</p> <p>helpful [1] 38/18</p> <p>helpline [5] 75/13 75/17 97/5 113/3 114/17</p> <p>helps [1] 125/15</p> <p>hence [1] 89/3</p> <p>her [12] 2/9 103/21 117/8 126/5 126/6 127/8 128/7 128/9 131/7 135/13 135/14 139/13</p> <p>here [57] 15/2 18/21 19/5 21/8 22/12 25/14 26/10 27/24 29/12 29/17 29/24 30/6 30/12 35/1 35/17 36/4 40/18 43/20 45/11 47/9 47/19 49/1 51/14 52/5 52/19 60/5 65/21 68/3 68/12 69/4 71/1 75/24 76/24 77/13 77/19 77/22 78/15 80/19 82/2 82/25 83/5 83/16 93/16 104/3 104/4 104/6 106/19 107/1 107/8 109/22 112/15 112/24 117/17 131/23 132/8 136/3 139/3</p> <p>Here's [1] 126/22</p> <p>herself [3] 117/13 118/3 132/14</p> <p>high [4] 1/9 97/5 124/25 135/14</p> <p>higher [3] 48/13 125/3 137/6</p> <p>highlight [1] 110/9</p> <p>him [10] 13/12 80/11 87/15 87/19 98/24 99/6 100/12 122/20 123/20 129/6</p> <p>himself [4] 79/21 90/15 90/21 121/16</p> <p>his [29] 1/11 65/13 72/16 74/11 76/18 76/21 77/6 79/5 79/14 79/15 80/1 80/2 80/19</p>
G				
<p>gain [3] 79/21 90/15 90/21</p> <p>gained [1] 3/16</p> <p>Garry [7] 105/20 119/2 129/7 129/15 130/4 131/17 131/19</p> <p>gathering [1] 64/12</p> <p>gave [6] 24/11 48/10 72/19 78/4 134/7 134/10</p> <p>general [7] 51/8 60/20 74/15 85/9 110/2 110/15 136/15</p> <p>generated [5] 11/4 66/13 66/15 66/16 100/15</p> <p>get [29] 9/10 16/10 21/18 21/23 23/11 34/23 39/23 45/19 46/17 55/24 56/2 56/4 64/17 68/1 68/2 71/2 86/21 86/23 103/1 105/18 106/11 108/10 116/16 122/16 122/17 122/23 123/18 130/15 133/10</p> <p>getting [4] 7/5 8/1 70/20 95/8</p> <p>give [14] 13/15 19/6 35/17 39/17 43/9 57/16 89/22 109/25 112/7 114/14 116/13</p>	<p>108/13 113/22 131/18</p> <p>going [52] 12/4 23/23 25/1 25/2 37/20 39/12 43/24 45/8 46/21 49/5 50/13 64/22 66/1 67/21 68/9 70/3 70/12 70/21 71/6 73/14 75/3 78/16 79/11 80/17 81/10 88/6 89/4 90/2 91/7 93/4 95/14 97/8 104/12 105/6 107/17 108/9 112/15 113/15 116/7 116/12 116/14 116/16 119/20 125/17 126/25 134/3 134/6 135/20 136/7 137/7 137/16 138/17</p> <p>gone [9] 22/7 24/1 52/24 54/17 75/16 95/9 112/19 114/20 137/11</p> <p>good [14] 1/3 2/12 25/20 35/22 46/16 49/22 69/5 78/10 87/12 113/7 113/9 114/2 128/14 140/3</p> <p>got [17] 24/24 39/11 47/4 47/7 50/3 54/22 55/6 57/12 58/21 62/9 67/1 73/21 106/12 122/25 131/17 131/23 131/23</p> <p>governing [1] 15/3</p> <p>Government [2]</p>	<p>H</p> <p>had [226]</p> <p>hadn't [6] 26/24 57/17 64/20 100/25 108/11 115/12</p> <p>half [2] 115/21 119/1</p> <p>halfway [2] 116/12 130/23</p> <p>Hallowe'en [1] 131/8</p> <p>hand [4] 42/5 54/15 94/1 120/3</p> <p>handed [3] 29/4 32/2 32/18</p> <p>hands [3] 11/15 11/21 135/19</p> <p>handwritten [1] 112/16</p> <p>happen [2] 49/15 126/22</p> <p>happened [9] 22/6 22/6 25/16 46/20 69/9 79/8 128/6 129/2 137/10</p> <p>happening [5] 30/23 41/19 47/6 111/7 117/24</p> <p>happens [1] 69/11</p> <p>happy [3] 59/6 106/20 115/21</p> <p>hard [6] 2/15 56/8 57/19 57/21 58/10 131/21</p> <p>has [35] 1/13 1/22 6/12 29/3 31/4 52/20</p>	<p>68/18 68/19 70/12 80/7 83/23 87/11 89/1 89/16 89/23 90/14 97/10 97/18 97/19 97/21 97/25 98/2 98/5 98/25 108/22 113/21 114/1 117/6 117/7 117/13 131/19 132/14 136/19 137/5 138/19</p> <p>hasn't [1] 24/1</p> <p>have [337]</p> <p>haven't [2] 125/13 125/15</p> <p>having [19] 5/10 10/5 16/17 25/20 29/21 42/6 52/15 57/15 76/5 76/15 76/17 79/2 82/23 83/10 84/20 100/2 109/24 110/3 119/13</p> <p>he [93] 13/13 13/15 13/16 13/17 13/18 13/19 41/11 41/12 48/20 54/19 58/6 63/17 65/5 65/10 65/12 65/13 66/23 67/13 68/7 68/8 70/1 72/17 72/18 72/19 72/21 72/22 73/15 73/21 73/21 73/23 75/12 76/4 76/6 76/7 76/21 77/5 77/6 77/6 77/9 77/11 77/14 77/14 79/5 79/6 79/8 79/13 79/17 79/18 79/20 79/20 79/23 80/4 80/5 80/19 80/20 81/12 81/14 81/16 81/16 81/18 81/24 82/3 82/3 82/4 82/5 82/6 82/7 82/7 82/9 82/9 82/10 82/11 82/12 83/1 83/2 83/14 83/20 85/3 92/2 93/6 93/10 94/6 95/1 99/11 100/25 101/1 105/21 121/15 129/8 129/9 129/16 134/23 137/17</p> <p>he'd [1] 54/21</p> <p>he's [1] 71/4</p> <p>head [17] 28/3 28/9 28/16 28/17 28/20 38/14 48/15 48/20 102/21 102/25 103/7 111/25 123/16 135/14 135/19 135/24 137/18</p> <p>heading [4] 51/8 88/8 90/3 91/8</p> <p>health [2] 13/3 128/14</p> <p>hear [3] 1/3 42/22 78/10</p> <p>heard [4] 5/3 75/3 124/25 135/23</p>	<p>hearing [2] 2/4 140/10</p> <p>heart [1] 119/25</p> <p>Heather [2] 125/25 138/7</p> <p>heavily [1] 118/12</p> <p>held [7] 3/11 3/22 10/11 43/5 91/12 118/24 135/14</p> <p>Hello [1] 42/22</p> <p>help [10] 7/3 30/3 31/7 36/9 41/23 62/6 65/3 77/11 81/24 117/19</p> <p>Helpdesk [3] 43/10 53/20 112/22</p> <p>helped [1] 30/5</p> <p>helpful [1] 38/18</p> <p>helpline [5] 75/13 75/17 97/5 113/3 114/17</p> <p>helps [1] 125/15</p> <p>hence [1] 89/3</p> <p>her [12] 2/9 103/21 117/8 126/5 126/6 127/8 128/7 128/9 131/7 135/13 135/14 139/13</p> <p>here [57] 15/2 18/21 19/5 21/8 22/12 25/14 26/10 27/24 29/12 29/17 29/24 30/6 30/12 35/1 35/17 36/4 40/18 43/20 45/11 47/9 47/19 49/1 51/14 52/5 52/19 60/5 65/21 68/3 68/12 69/4 71/1 75/24 76/24 77/13 77/19 77/22 78/15 80/19 82/2 82/25 83/5 83/16 93/16 104/3 104/4 104/6 106/19 107/1 107/8 109/22 112/15 112/24 117/17 131/23 132/8 136/3 139/3</p> <p>Here's [1] 126/22</p> <p>herself [3] 117/13 118/3 132/14</p> <p>high [4] 1/9 97/5 124/25 135/14</p> <p>higher [3] 48/13 125/3 137/6</p> <p>highlight [1] 110/9</p> <p>him [10] 13/12 80/11 87/15 87/19 98/24 99/6 100/12 122/20 123/20 129/6</p> <p>himself [4] 79/21 90/15 90/21 121/16</p> <p>his [29] 1/11 65/13 72/16 74/11 76/18 76/21 77/6 79/5 79/14 79/15 80/1 80/2 80/19</p>

H	95/8 100/15 100/21 102/25 105/11 108/9 113/12 127/21 However [3] 79/17 98/11 129/2 huh [1] 68/14 human [2] 117/25 118/9	122/13 123/6 126/13 133/22 134/13 135/11 I don't [31] 14/6 14/8 24/11 25/25 44/14 46/3 52/10 74/24 83/3 91/24 92/25 100/18 100/18 106/25 112/3 114/13 115/5 119/12 119/23 121/2 124/21 125/16 126/7 130/9 133/10 134/12 134/18 135/17 136/4 137/3 137/3 I feel [2] 25/7 34/22 I felt [1] 42/4 I first [1] 34/19 I flagged [1] 124/7 I follow [1] 102/7 I found [4] 56/8 70/14 70/18 87/13 I got [1] 131/17 I had [27] 19/18 26/13 29/3 32/18 35/7 42/3 42/4 42/8 56/15 57/8 64/9 72/9 75/8 76/8 77/15 107/24 110/25 111/3 112/21 127/19 128/12 128/15 128/22 129/4 129/6 130/4 138/14 I hadn't [1] 115/12 I have [11] 2/22 34/19 49/23 51/6 88/5 106/22 115/11 120/9 138/4 138/5 138/25 I haven't [1] 125/15 I held [1] 43/5 I hope [1] 139/25 I immediately [1] 111/21 I in [1] 70/22 I interrupted [1] 50/6 I joined [1] 29/1 I joint [1] 32/8 I just [12] 31/1 60/16 72/12 107/23 112/10 114/22 121/22 130/16 133/11 136/21 139/9 139/11 I knew [2] 95/9 138/16 I know [7] 51/22 103/2 106/19 106/21 106/22 111/16 138/15 I left [1] 41/7 I may [1] 60/10 I maybe [1] 63/11 I mean [5] 26/11 60/8 70/21 124/8 133/5 I met [1] 100/24 I misunderstanding [1] 101/20 I most [1] 51/22 I moved [1] 111/17	I must [2] 62/8 94/4 I needed [1] 31/2 I never [2] 19/16 71/10 I now [1] 138/22 I overran [1] 138/25 I picked [1] 129/3 I please [1] 1/18 I produced [1] 32/2 I raised [1] 111/7 I read [2] 76/19 139/10 I realised [1] 44/16 I recall [9] 56/5 100/9 100/13 110/4 134/6 134/6 134/8 134/12 135/3 I remember [8] 7/5 28/21 36/22 57/22 110/22 111/8 111/17 122/19 I requested [2] 34/20 122/14 I said [2] 91/24 138/5 I sat [1] 7/7 I say [6] 30/20 57/23 60/10 95/15 122/6 137/17 I see [3] 31/4 62/1 106/25 I send [1] 114/23 I should [4] 2/2 33/12 33/13 56/4 I stated [1] 104/17 I stop [1] 92/4 I suppose [1] 124/1 I think [28] 13/19 36/20 39/10 39/19 41/12 44/7 56/13 58/6 61/22 61/24 63/16 67/10 67/11 73/11 73/21 73/23 83/7 87/19 89/5 100/9 104/8 110/9 119/20 127/11 133/3 133/14 137/11 140/5 I thought [1] 71/17 I together [1] 63/2 I took [1] 30/7 I trusted [1] 136/20 I understand [2] 50/15 102/5 I understood [2] 59/13 76/6 I usually [1] 16/11 I vaguely [2] 48/21 87/19 I want [3] 47/5 126/4 126/24 I wanted [4] 31/2 44/23 57/9 57/14 I was [27] 5/15 7/24 19/2 26/12 31/1 31/2 41/2 41/8 46/12 47/3	56/14 59/6 68/3 71/16 77/4 86/21 93/24 105/21 111/16 111/20 122/14 128/13 128/17 129/4 138/12 139/15 139/16 I wasn't [5] 44/15 71/10 71/12 74/1 75/2 I went [1] 15/19 I will [5] 2/14 3/5 3/7 87/12 120/3 I wish [1] 140/2 I worked [5] 29/6 30/13 42/3 42/6 93/21 I would [62] 5/16 12/12 14/23 17/14 22/4 23/15 23/18 25/10 26/6 27/4 27/11 43/9 44/12 44/12 46/13 46/14 46/24 47/2 47/6 48/19 48/19 49/20 54/14 54/22 55/19 58/17 60/8 62/23 63/18 63/22 63/24 74/10 74/13 74/15 74/16 75/16 75/17 75/17 83/17 85/21 87/2 92/11 93/20 93/22 94/3 95/5 95/8 95/16 101/15 111/1 111/2 111/16 114/24 115/17 120/16 124/1 130/5 130/5 133/1 137/25 138/12 138/19 I wouldn't [6] 30/19 58/20 64/7 71/23 93/14 125/1 I'd [17] 19/19 31/22 35/18 42/24 46/24 61/23 62/3 65/1 65/17 75/7 95/13 103/23 104/17 111/6 125/16 129/1 136/20 I'll [6] 46/17 115/20 115/22 126/8 130/15 134/2 I'm [48] 14/16 25/5 28/17 30/17 41/12 46/3 48/6 48/12 49/5 50/5 51/16 52/2 52/10 58/4 59/18 59/21 59/21 60/16 72/24 74/9 77/4 83/9 92/12 93/14 93/16 94/6 95/19 102/16 103/5 106/17 106/20 106/20 110/20 111/23 115/21 116/14 117/22 119/12 123/12 125/1 126/25 128/4 130/18 130/18 134/3 135/17 138/25 139/24 I've [19] 24/1 42/12
----------	---	---	---	---

I	97/21 99/14	22/9	integrity [5] 50/12	45/5 59/9 61/5
I've... [17] 61/25	illegal [1] 50/21	individuals [2] 58/18	51/10 96/9 96/12	investigating [10]
109/12 109/14 110/5	image [1] 134/25	58/20	118/15	4/9 4/12 25/6 59/3
110/5 115/17 122/18	imagine [1] 138/20	infer [1] 81/2	intend [1] 1/20	82/22 94/24 94/25
126/14 126/14 126/17	immediately [1]	inference [1] 98/21	intended [2] 79/23	101/1 139/13 140/4
127/11 127/11 130/24	111/21	influenced [1] 26/14	108/8	investigation [53]
133/25 136/18 137/23	impact [7] 49/3 49/17	inform [1] 132/24	intent [3] 90/16 90/21	5/9 5/19 6/9 10/25
138/17	101/6 101/9 101/10	informally [2] 31/9	98/18	11/5 16/24 17/2 23/14
Icon [1] 112/19	101/13 136/7	40/10	intention [3] 71/24	23/15 23/17 23/22
identified [13] 6/24	impacted [1] 96/10	information [58] 9/10	80/1 81/3	27/21 28/1 32/15
17/23 19/13 20/15	implemented [1]	17/21 24/24 25/7 25/8	interdependent [1]	32/16 32/23 32/24
20/25 80/10 96/23	39/5	28/4 32/21 33/3 33/11	96/11	37/7 37/9 37/17 42/3
97/11 98/14 98/25	imply [1] 81/2	34/25 35/7 35/10	interest [1] 130/21	45/9 47/4 50/2 53/3
99/2 99/9 117/5	import [1] 102/18	35/10 36/25 42/2 42/5	interesting [3] 66/21	55/10 61/8 64/21 65/2
identifies [1] 96/2	important [1] 74/7	42/6 44/13 44/15	119/23 124/3	75/2 91/16 92/23
identifying [1] 98/13	impressed [1] 130/1	44/20 44/22 45/10	internal [3] 4/20 29/2	96/24 97/10 98/13
IDs [3] 8/4 98/5 98/11	impression [1] 58/21	47/2 50/3 54/2 55/17	38/13	103/14 110/25 114/11
ie [3] 60/1 88/14	improper [2] 80/3	60/9 60/13 63/7 63/10	internally [1] 4/10	114/15 115/1 117/20
90/20	81/5	63/18 64/24 66/9	International [1] 1/9	118/6 126/24 127/4
ie dishonestly [1]	improve [3] 38/23	66/11 66/16 73/24	interpret [1] 55/17	127/15 132/3 132/19
90/20	40/4 40/12	74/1 74/11 75/19	interrupted [1] 50/6	132/24 133/19 136/11
ie the [2] 60/1 88/14	inaccuracies [3] 90/6	86/17 86/18 86/22	intervention [1] 23/4	139/14 139/15 139/19
if [120] 14/8 14/22	91/4 121/19	86/23 87/7 87/12 91/9	interview [57] 15/14	investigations [30]
15/5 20/14 21/6 23/22	inaudible [2] 67/5	92/16 92/18 93/14	17/4 19/23 20/17	4/16 4/20 10/20 12/22
24/18 25/16 32/4 33/2	69/4	93/21 93/22 93/23	20/20 21/2 21/4 21/11	15/4 17/3 24/21 24/21
33/10 35/23 36/3	incentive [2] 90/5	96/10 111/25 112/14	21/13 23/20 65/17	24/24 25/1 25/2 25/12
38/12 38/18 39/14	121/15	117/25 118/8 138/14	65/21 65/24 66/2	26/15 29/6 36/1 37/21
39/15 42/16 43/10	incident [1] 13/1	informative [1] 140/2	67/14 72/17 72/19	38/4 39/3 40/9 40/14
43/16 43/21 43/24	incidents [2] 129/19	informed [3] 56/1	73/2 73/6 73/21 76/1	56/2 56/11 56/18 58/8
44/19 44/23 44/24	136/13	113/8 116/24	76/4 76/16 76/18 77/5	60/21 60/25 61/20
45/8 45/12 45/20 46/5	include [9] 5/4 10/6	initial [13] 5/22 6/7	82/23 91/21 91/23	91/14 92/21 118/25
46/18 46/25 47/3	22/18 24/20 53/9	7/18 7/20 9/6 9/9 9/16	92/1 93/6 103/23	investigative [2]
47/10 47/24 49/9 50/9	53/11 62/20 84/11	9/24 14/2 47/20 64/20	104/8 107/6 107/12	40/14 53/15
50/15 50/17 51/16	99/3	114/11 114/25	107/18 107/20 107/23	investigator [40] 4/2
51/25 52/12 52/18	included [4] 38/1	initially [1] 65/10	109/9 109/24 110/4	5/4 5/16 5/20 5/23
52/21 52/24 53/6	64/13 93/18 99/9	input [5] 28/11 40/23	110/10 110/13 112/2	6/17 10/8 10/12 12/9
53/22 53/24 54/21	including [6] 3/22 6/3	80/8 96/14 96/15	116/17 116/23 117/19	12/14 12/15 13/19
55/4 55/4 55/6 55/14	7/17 54/11 72/20	inputs [2] 88/11	121/2 121/4 126/5	14/18 18/17 19/20
56/7 56/20 56/20 57/9	84/20	88/14	126/6 126/9 126/11	19/23 20/11 20/15
57/13 57/14 58/16	inclusion [2] 88/25	inputting [1] 76/6	127/8 127/16 127/17	21/1 21/15 23/6 30/8
58/21 59/4 59/16	90/18	inquiries [1] 33/19	130/8 130/10	38/2 38/11 38/19 40/1
61/11 62/4 62/25	Incomplete [1] 91/8	inquiry [16] 1/17 2/13	interviewed [2] 33/1	40/9 40/17 40/21 41/1
62/25 63/25 64/15	incorporated [1] 90/8	2/15 3/7 11/14 11/18	107/7	41/9 41/22 43/5 44/14
64/16 64/20 69/23	increase [3] 24/9	13/15 17/6 20/1 21/16	interviewer [2] 65/22	50/23 65/15 83/1
71/17 73/17 73/24	24/10 25/18	23/19 31/4 33/17	65/24	83/14 104/9 126/2
74/13 74/14 74/24	increased [2] 97/3	137/9 137/15 140/1	interviewing [5] 6/4	Investigator's [4]
78/5 81/19 86/19	99/18	Inquiry's [3] 1/19 2/4	103/25 104/5 104/25	20/2 20/6 44/5 44/10
86/21 86/23 87/11	increases [1] 38/17	29/18	111/11	Investigator/Fraud
87/13 89/5 91/23	indeed [2] 97/3 99/18	insofar [4] 101/4	interviews [4] 79/14	[1] 43/5
92/15 92/23 92/25	independent [1]	101/14 102/7 102/8	79/16 81/8 81/9	investigators [12]
93/21 93/23 93/23	36/14	inspection [4] 35/25	into [19] 1/19 1/21	10/19 10/24 13/2
94/13 97/8 98/1 105/8	independently [1]	36/8 36/22 37/10	2/1 16/19 23/18 28/11	16/21 22/24 26/5
105/8 106/13 106/17	100/16	Inspector [4] 35/19	32/18 58/3 66/11 90/8	27/14 36/23 36/23
106/21 108/19 108/21	indicate [4] 1/18	36/6 36/17 54/16	99/6 104/20 111/25	37/23 40/3 40/7
109/5 109/13 110/7	94/21 117/10 132/10	Inspector's [1] 36/4	117/25 118/8 123/24	invite [3] 20/16 21/2
110/17 112/6 113/23	indicated [2] 130/24	inspectorate [1]	123/25 133/10 135/10	117/1
115/11 117/21 123/1	131/11	36/15	intricate [1] 58/3	involve [1] 37/2
125/15 126/17 128/7	indication [2] 70/20	Inspectors [3] 38/23	introduce [1] 20/7	involved [22] 4/8
130/4 130/21 131/7	89/23	40/5 40/12	introduced [4] 66/24	19/3 25/10 26/24
132/7 138/25 139/15	indictment [1] 80/6	instance [4] 8/11	67/9 74/5 104/17	30/20 30/21 30/25
ii [5] 91/4 96/13	individual [6] 58/18	33/21 62/25 67/24	investigate [3] 59/20	31/2 33/1 36/19 38/5
96/25 97/19 99/9	97/17 98/8 98/9 98/10	instead [3] 3/8 31/9	87/11 111/1	42/1 51/6 55/24 85/19
iii [5] 91/6 96/14 97/5	99/5	39/12	investigated [8] 23/8	85/21 126/3 138/9
	individualised [1]	instructed [1] 94/10	23/15 24/1 30/3 41/2	138/12 139/11 139/15

L
longer [2] 78/24
94/11
longest [1] 130/12
look [21] 8/2 8/3 8/4
8/5 8/15 16/9 16/19
23/18 31/23 35/10
37/3 44/18 52/17 59/3
62/1 63/9 88/1 106/14
107/9 130/13 135/15
looked [15] 31/24
33/10 35/7 41/3 45/4
48/25 53/20 53/21
53/25 54/18 64/24
76/15 82/23 83/21
118/23
looking [21] 6/12
26/11 26/17 42/6
48/24 52/4 57/24
72/22 73/1 73/1 74/10
74/14 92/20 94/14
99/23 114/4 115/20
115/22 118/21 121/1
130/6
Loose [1] 112/19
losing [1] 6/10
loss [32] 20/15 20/25
21/20 21/21 21/24
22/2 22/4 22/6 22/16
23/9 23/12 23/19
34/11 50/24 51/4 52/8
52/9 79/24 79/24 80/4
80/21 81/12 89/3
89/10 90/9 90/14
90/16 90/20 98/18
99/16 112/21 113/8
losses [12] 76/7
76/10 77/2 77/14
77/18 77/20 79/1 79/4
79/9 84/21 90/13 93/7
lost [7] 6/10 65/13
97/9 97/18 103/21
115/21 135/25
lot [9] 14/6 14/8 34/1
56/9 72/7 72/9 106/8
106/9 128/13
lower [1] 24/5
lunch [2] 62/1 78/3

M
Madam [1] 112/18
made [37] 8/4 8/16
10/11 11/13 31/12
34/11 39/2 43/13
46/21 52/14 52/23
55/8 56/3 56/7 58/5
58/19 59/16 59/20
63/14 65/14 66/21
68/10 75/12 84/2 84/9
84/11 95/16 97/12
99/16 102/3 103/22
106/15 106/22 106/22
113/3 117/6 134/16

magnitude [1] 97/3
mail [30] 4/1 4/9 4/10
4/12 5/20 5/23 5/25
6/9 6/10 6/11 6/11
6/13 6/25 9/21 12/6
12/8 12/14 28/13 29/4
35/24 35/25 36/21
36/21 36/23 37/17
37/24 38/20 42/9
102/14 111/18
main [1] 41/9
Mainly [1] 19/1
maintained [2] 18/1
18/6
major [1] 39/20
majority [1] 103/20
make [25] 13/23
13/23 15/24 20/10
26/22 28/4 33/20
44/11 51/11 53/5 59/8
60/21 67/19 69/4
69/22 70/1 73/6 80/15
86/3 86/12 102/25
113/7 113/9 114/2
136/17
maker [3] 28/8 28/13
33/9
making [5] 25/21
49/3 49/18 72/14
139/23
man [2] 58/5 129/7
manage [1] 95/24
management [3]
75/9 75/18 100/5
manager [35] 3/23
4/16 13/13 18/14
20/13 20/14 27/5 27/8
28/6 31/14 32/1 40/24
41/11 42/8 42/8 43/6
43/7 43/11 43/12
43/12 44/5 44/8 48/20
53/22 65/19 74/12
95/5 95/7 95/12 95/12
124/7 124/9 129/8
129/12 129/21
Managers [5] 14/12
47/14 47/25 48/10
120/23
Manchester [1]
27/12
manipulation [1]
69/4
manner [1] 81/8
many [3] 41/14 75/8
97/5
mark [2] 25/25 26/1
marked [3] 24/16
26/2 128/25
Marsh [2] 123/16
123/18
matched [1] 88/15
material [17] 11/4
11/9 11/15 11/20 32/3
32/4 32/13 33/16

62/13 63/14 64/25
84/5 84/7 84/25 85/5
85/14 86/13
matter [6] 43/10
43/11 52/13 52/22
55/10 117/7
Maureen [22] 51/13
62/12 103/14 103/15
103/24 105/15 107/1
107/7 109/23 112/2
112/5 112/16 112/23
113/4 114/6 116/2
117/13 118/2 125/23
131/14 132/14 138/6
maximise [1] 26/18
maximised [1] 22/19
maximum [1] 23/2
may [23] 1/21 2/6
41/17 45/7 46/12 50/2
59/21 60/10 76/15
80/12 81/17 90/6
92/18 98/12 100/9
108/2 111/19 114/3
119/23 121/1 124/10
124/14 130/19
maybe [22] 4/3 7/21
12/25 14/7 14/7 16/6
16/16 19/2 24/7 24/25
25/18 42/5 46/16 48/1
48/14 48/15 48/21
57/11 57/15 63/11
75/6 111/19
McAlerney [2]
125/25 138/7
McAlerney's [1]
126/2
McClure [2] 121/12
124/23
McFarland [1]
134/15
Mckay [1] 134/9
McKelvey [48] 51/13
62/12 103/14 103/15
103/19 103/24 105/15
107/1 107/8 107/24
107/24 109/9 109/16
109/23 110/6 112/2
112/16 112/23 112/24
116/19 116/23 116/25
117/4 117/6 117/11
117/13 118/2 119/1
119/7 125/23 126/4
126/11 127/5 128/2
129/20 131/4 131/15
132/11 132/14 135/10
135/13 135/18 136/10
136/12 136/17 138/6
139/10 139/18
McKelvey's [11]
112/5 113/4 114/6
116/3 118/12 118/18
119/11 119/14 119/16
128/5 128/9
McKenny [1] 110/8

McLaughlin [55]
51/13 62/12 65/2 65/3
65/22 66/3 66/19
67/10 68/6 68/11
68/16 69/25 70/4 71/1
72/16 75/10 75/14
76/1 76/4 76/12 76/16
76/20 77/2 77/5 79/4
82/2 83/7 83/20 83/23
84/2 87/17 89/2 90/5
90/14 90/19 92/1 94/1
94/10 94/16 95/1
98/15 98/23 99/11
99/16 100/3 100/16
107/7 107/12 121/14
121/20 121/21 122/22
124/13 124/24 125/5
McLaughlin's [19]
65/15 73/5 73/15
74/18 78/12 78/15
82/24 83/1 83/11
83/17 83/25 87/15
94/20 94/25 97/1
99/19 107/15 121/1
123/21
McLERNON [3] 1/5
1/8 141/2
McLernon's [2] 1/15
1/24
me [53] 7/8 7/9 7/25
13/20 28/6 32/4 32/8
33/4 33/12 33/22
34/23 39/14 39/22
41/6 42/5 46/14 46/15
54/17 54/19 55/1 55/3
56/3 56/4 57/16 77/22
82/22 83/7 86/19
86/23 86/25 87/11
105/8 105/20 108/3
108/8 110/24 112/22
114/23 118/17 122/1
125/22 125/24 125/25
125/25 126/1 127/21
128/17 128/21 129/17
133/11 133/24 134/1
139/18
mean [15] 6/7 8/21
18/3 20/24 26/11
26/18 28/17 28/18
45/25 60/8 70/21
109/14 124/8 126/18
133/5
meant [1] 39/21
measured [1] 25/13
measures [1] 23/4
medication [1]
128/13
meet [2] 25/16 25/17
meeting [15] 16/17
24/18 25/23 27/10
37/1 87/19 87/20
100/2 100/2 100/8
100/9 100/12 100/14
100/18 100/20

meetings [9] 27/7
27/9 27/10 31/12
47/14 47/25 55/2 55/7
87/3
members [2] 22/10
110/19
Memorandum [10]
29/9 29/13 30/10
30/15 30/22 31/5 31/7
31/15 31/17 63/12
memory [1] 65/3
mention [1] 117/17
mentioned [5] 33/21
61/9 76/5 100/2
100/19
mentored [2] 13/12
13/20
mentoring [1] 13/16
merits [1] 121/3
message [7] 9/18
9/24 10/2 47/18 47/20
47/22 47/23
met [2] 63/24 100/24
method [3] 16/1
38/25 129/17
might [8] 17/22 19/5
19/12 25/1 44/2 92/8
106/4 121/18
Milton [5] 5/25 6/21
9/19 11/25 12/8
mind [5] 6/7 19/14
86/25 131/7 138/10
minus [3] 113/17
113/17 113/21
minutes [2] 115/11
115/18
misappropriated [1]
89/2
misrepresenting [1]
132/17
missing [2] 88/8
88/10
mistake [3] 106/16
106/21 106/22
misunderstanding [1]
101/20
Moloney [4] 120/6
120/7 125/10 141/5
moment [4] 68/13
78/2 92/12 115/1
monetary [1] 23/2
money [11] 23/7
23/11 23/21 23/25
24/3 52/7 53/19 70/19
99/6 106/10 128/23
month [12] 24/18
27/7 27/11 44/1 44/3
45/2 45/8 45/25 46/5
46/6 46/10 46/19
months [4] 13/13
14/7 43/15 91/12
more [26] 7/21 7/23
16/13 24/8 24/12 31/9
31/21 33/11 35/24

M	79/4 82/2 83/7 83/20 83/23 84/2 87/17 89/2 90/5 90/14 90/19 92/1 94/1 94/10 94/16 95/1 98/15 98/23 99/11 99/16 100/3 100/16 107/7 107/12 121/14 121/20 121/21 122/22 124/13 125/5	132/19 139/3 139/7 139/20 139/22 141/4 Ms Connolly's [1] 126/2 Ms Earley's [1] 126/3 Ms McAlerney's [1] 126/2 Ms McKelvey [2] 112/24 131/4 MS PRICE [6] 2/11 115/8 125/10 126/5 139/20 141/4 Ms Price's [1] 102/1 Ms Winter [19] 2/6 2/8 2/12 3/4 42/24 78/12 91/18 92/4 120/2 120/9 122/17 124/9 124/17 125/9 125/23 132/19 139/3 139/7 139/22 Ms Winter's [12] 1/6 3/4 14/24 17/12 27/24 28/24 43/2 50/10 55/22 75/21 82/16 119/24 much [8] 1/4 2/5 23/11 58/22 120/8 125/9 134/24 140/7 must [5] 61/22 62/8 69/24 70/23 94/4 mute [1] 78/3 my [77] 7/7 7/24 15/5 15/7 15/24 19/23 22/4 22/5 23/18 26/7 27/5 27/7 30/21 34/19 39/11 39/12 43/11 43/14 44/14 44/17 45/16 45/16 47/16 48/19 57/8 58/6 60/14 60/14 63/19 63/21 64/3 64/9 70/22 72/10 95/13 101/21 102/5 103/1 104/15 105/21 106/24 109/12 110/19 111/4 111/5 115/5 115/12 120/1 120/16 123/7 123/25 124/7 126/14 127/10 127/19 127/23 128/11 128/14 128/15 128/20 129/5 129/12 129/14 130/21 132/16 132/25 133/7 134/2 134/8 134/19 135/22 136/18 136/21 136/25 137/4 138/13 138/18 myself [8] 31/15 32/20 44/24 47/5 93/20 101/24 111/4 122/1	named [2] 129/7 137/12 namely [1] 1/25 names [4] 48/12 104/10 137/15 137/24 nation's [1] 134/25 nature [1] 38/4 NBSC [2] 113/23 114/3 need [18] 1/12 11/8 33/23 33/24 34/14 34/17 47/1 50/21 54/19 54/21 55/12 56/16 59/1 59/5 59/19 94/2 122/21 122/22 needed [20] 12/23 14/22 18/22 31/2 33/2 33/7 33/11 34/2 34/11 37/1 39/14 43/16 43/16 44/20 59/8 59/13 64/17 64/17 92/9 116/24 needing [1] 46/10 negative [5] 90/3 90/4 90/8 90/18 121/13 neither [2] 83/18 106/18 never [7] 19/16 46/12 71/10 73/12 81/25 82/1 135/14 new [4] 15/16 16/4 16/19 134/25 next [10] 35/14 39/24 46/6 46/10 93/5 106/17 107/4 116/8 125/22 125/24 Ni [2] 37/8 38/19 night [2] 67/23 68/5 nightmare [1] 138/20 nine [1] 57/11 no [86] 1/12 4/7 8/17 9/5 9/9 9/25 10/4 14/19 18/19 20/14 20/23 20/25 21/7 22/4 24/23 25/2 25/7 25/11 26/16 27/16 28/15 29/2 30/7 36/11 45/7 45/16 46/12 51/1 52/10 58/11 58/20 59/19 70/11 70/11 71/11 72/24 73/11 73/20 75/1 75/7 77/4 78/24 80/3 83/3 83/17 86/2 90/5 92/11 94/11 95/19 99/10 100/7 100/18 101/12 101/23 102/7 103/11 107/15 108/20 109/2 109/2 110/6 110/10 111/1 111/10 111/22 111/23 115/5 117/4 117/6 118/17 119/12 119/18 121/14 123/19 128/4	130/5 130/9 133/17 134/22 135/8 135/17 136/2 137/3 137/17 139/5 nobody [2] 121/8 133/3 none [2] 50/18 99/16 nonetheless [1] 103/21 nor [1] 38/9 normal [1] 106/6 normally [2] 115/9 131/12 North [1] 110/20 Northern [64] 1/10 3/13 5/13 12/10 14/17 14/21 15/8 15/10 15/12 15/12 15/18 15/22 15/23 16/8 16/24 17/3 17/4 17/14 17/16 17/24 18/4 18/17 18/22 18/23 23/16 24/25 27/22 28/1 28/11 28/19 29/2 29/8 30/4 30/8 30/24 34/7 35/19 36/7 36/8 36/15 36/19 38/7 38/13 39/21 40/1 40/4 40/7 40/16 41/1 41/23 41/24 41/25 49/24 60/21 60/24 61/5 61/17 65/7 86/22 103/16 127/3 128/12 139/11 140/4 not [161] notebook [3] 20/11 53/13 62/25 notes [2] 17/3 53/15 notetaker [1] 12/24 notice [1] 126/22 notwithstanding [1] 104/10 November [1] 17/1 November 2002 [1] 17/1 now [35] 1/21 9/17 23/17 27/1 42/16 45/14 45/25 46/20 46/25 50/15 51/14 51/22 57/23 84/6 91/17 103/12 105/20 106/3 115/9 119/15 119/21 119/25 123/3 126/24 127/8 127/14 130/2 130/7 131/22 132/3 132/16 132/22 134/2 138/15 138/22 number [23] 24/20 44/1 45/24 46/1 55/25 56/13 57/24 72/19 80/10 84/2 88/11 88/13 88/14 88/16 96/10 97/5 97/11 99/15 110/23 114/5
	Mr McLaughlin's [19] 65/15 73/5 73/15 74/18 78/12 78/15 82/24 83/1 83/11 83/17 83/25 87/15 94/20 94/25 97/1 99/19 107/15 121/1 123/21 Mr McLernon's [2] 1/15 1/24 Mr Moloney [4] 120/6 120/7 125/10 141/5 Mr Scott [3] 123/5 123/10 123/13 Mr Thorpe [13] 40/24 41/10 41/12 65/18 65/23 68/22 69/19 103/24 104/5 104/6 104/15 108/15 109/3 Mr Thorpe's [2] 116/9 124/11 Mrs [28] 103/19 107/24 107/24 109/9 109/16 110/6 118/12 118/18 119/1 119/7 119/11 119/14 119/16 119/19 126/4 126/11 128/2 128/5 128/9 129/20 135/10 135/13 135/18 136/10 136/12 136/17 139/10 139/18 Mrs McKelvey [20] 103/19 107/24 107/24 109/9 109/16 110/6 119/1 119/7 126/4 126/11 128/2 129/20 135/10 135/13 135/18 136/10 136/12 136/17 139/10 139/18 Mrs McKelvey's [7] 118/12 118/18 119/11 119/14 119/16 128/5 128/9 Ms [43] 1/6 2/6 2/8 2/11 2/12 3/4 3/4 14/24 17/12 27/24 28/24 42/24 43/2 50/10 55/22 75/21 78/12 82/16 91/18 92/4 102/1 112/24 115/8 119/24 120/2 120/9 122/17 124/9 124/17 125/9 125/10 125/23 126/2 126/2 126/3 126/5 131/4	N name [5] 2/16 22/12 60/6 116/8 116/9		

N	often [6] 14/4 38/5 44/12 46/7 46/16 56/9	22/19 26/19	35/16 36/2 43/19 47/24 50/13 53/17 62/1 67/3 68/4 68/15 69/23 73/16 74/6 79/11 81/10 81/16 82/4 85/3 87/6 89/4 89/5 91/8 93/4 96/3 99/4 109/10 113/7 113/25 114/1 116/22 120/3 128/24 131/9 131/14	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
number... [3] 120/24 128/21 134/16	oh [3] 15/21 26/11 69/14	opportunity [3] 27/18 117/12 132/12	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
numbers [1] 46/11	okay [19] 3/10 50/7 66/18 68/23 73/22 73/23 74/18 78/1 83/20 83/24 92/20 94/8 95/14 109/2 109/2 110/25 115/19 119/13 132/8	opposed [5] 7/14 11/24 46/9 63/5 92/8	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
numerals [1] 84/4	omitted [1] 127/14	or [187]	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
O	on [221]	oral [2] 1/23 2/1	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
o'clock [2] 68/5 68/5	once [11] 14/7 26/8 27/11 32/1 32/18 46/20 54/23 63/5 63/20 87/2 104/25	order [9] 17/24 19/6 19/8 19/11 19/18 33/22 34/2 104/10 116/14	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
objective [1] 22/15	one [47] 8/11 13/1 16/7 18/15 18/18 18/19 27/2 27/7 27/7 27/9 27/9 36/3 40/1 40/17 40/21 40/22 40/25 41/14 45/19 48/22 50/12 50/16 51/10 57/24 57/25 58/3 58/6 60/5 60/14 88/2 89/5 94/1 100/10 105/20 111/3 120/14 122/23 123/15 125/13 125/15 129/2 129/19 130/12 132/18 136/13 138/4 138/17	ordered [1] 65/12	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
objectives [7] 22/9 22/10 24/14 25/19 26/2 26/7 26/8	ones [2] 106/21 108/24	original [2] 71/20 114/19	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2] 19/20 84/1 page 50 [2] 104/2 104/3 page 51 [1] 90/2 page 52 [1] 104/12 page 54 [1] 105/6 page 59 [1] 94/13 page 6 [2] 36/4 128/8 page 61 [1] 95/21 page 7 [1] 116/12 page 76 [1] 107/17 page 8 [1] 132/4 page 86 [2] 130/11 130/13 page 94 [1] 65/20 pages [1] 22/11 paid [13] 17/24 19/6 19/8 19/9 19/11 19/17 33/21 34/2 77/12 97/20 97/23 107/25 116/13 paper [6] 63/1 108/1 108/16 109/6 109/17 118/12 papers [3] 12/4 110/5 117/15 paragraph [72] 5/23 6/20 7/16 13/25 14/24 15/2 16/6 17/11 17/13 18/13 18/21 19/22 20/3 27/23 27/25 28/23 28/24 31/19 31/22 31/25 35/14 37/4 37/22 39/24 39/24 43/1 43/3 43/19 43/20 45/11 47/8 48/25 50/9 50/11 51/5 51/12 52/11 52/17 52/18 55/21 59/15 59/22 60/18 61/2 61/3
obligation [2] 21/15 21/18	ongoing [8] 50/13 51/11 85/2 90/6 91/4 96/20 96/25 121/19	originally [1] 27/4	overages [1] 72/5 overclaims [1] 117/5 overly [1] 38/17 overran [1] 138/25 owed [1] 128/22 own [7] 18/12 26/7 29/3 37/5 45/16 55/13 111/4 ownership [1] 32/22	page 166 [1] 67/21 page 168 [1] 68/9 page 17 [3] 17/12 47/9 55/22 page 181 [1] 69/18 page 19 [1] 43/2 page 196 [1] 70/3 page 2 [1] 35/23 page 20 [5] 52/18 61/11 82/15 82/16 113/4 page 202 [1] 71/6 page 21 [2] 28/24 61/3 page 22 [1] 113/15 page 25 [1] 37/20 page 26 [4] 75/21 75/22 93/1 93/2 page 3 [1] 78/16 page 37 [2] 50/10 87/23 page 4 [1] 116/7 page 40 [1] 2/19 page 47 [1] 88/7 page 5 [2]

P	118/11	pension [12] 19/9 66/3 76/21 77/6 77/12 88/12 97/13 107/25 116/25 117/9 130/19 132/9	pick [2] 43/18 128/21 picked [1] 129/3 picking [1] 31/25 picture [1] 73/3 pinpoint [2] 21/20 21/24	53/2 64/22 67/19 72/8 74/3 90/4 90/24 91/21 93/10 110/2 128/13 129/24 130/16 139/12
paragraph... [27] 61/10 61/12 61/22 61/24 61/25 62/2 62/4 75/22 75/23 79/5 80/25 82/17 84/3 90/24 91/7 91/19 92/24 93/2 94/14 94/15 94/19 116/17 118/11 118/21 119/4 128/24 133/17	paragraph 71 [1] 50/9 paragraph 8 [1] 5/23 paragraph 9 [3] 6/20 7/16 18/13 paragraphs [8] 1/16 1/18 1/20 1/24 1/25 45/3 88/6 128/8	pensions [2] 117/2 131/12 penultimate [3] 59/15 80/25 116/17 people [17] 12/24 12/25 25/20 33/23 53/18 55/13 69/8 69/10 74/16 81/23 105/19 105/22 115/23 120/14 137/18 138/14 139/14	place [17] 5/6 8/6 14/5 25/22 29/2 29/5 29/12 30/5 30/7 31/19 32/7 68/4 73/16 74/6 107/6 126/7 136/14	pointed [2] 54/13 129/14 pointing [1] 21/16 points [3] 75/19 80/18 80/24
Paragraph 1.10 [1] 37/4	paragraphs 31 [1] 1/25 paragraphs 37 [1] 128/8	per [15] 9/11 9/12 23/9 23/12 24/4 24/14 25/14 36/16 45/24 48/4 111/12 120/21 121/25 122/4 137/21	placing [1] 79/4 plan [2] 71/24 115/10	POL [5] 38/2 38/10 38/19 40/1 40/8
paragraph 11 [2] 19/22 62/4	paranoid [1] 69/11	performance [1] 25/13	pleaded [2] 65/11 125/5	POL00039952 [1] 16/25
paragraph 15 [2] 14/24 15/2	parcels [1] 106/9	performed [1] 23/18	pleading [1] 135/10	POL00105025 [1] 22/8
paragraph 2 [1] 118/21	Pardoe [1] 124/14	perhaps [7] 14/9 46/14 47/24 62/1 70/12 102/8 118/17	please [122] 1/7 1/18 2/6 2/19 3/11 5/16 7/4 14/20 14/25 15/1 15/1 16/25 17/11 19/19 19/21 20/4 22/8 22/12 22/14 25/5 26/17 27/1 27/20 27/23 28/23 31/23 35/18 35/20 36/2 36/3 36/5 37/3 37/22 42/17 42/24 43/1 43/4 47/8 49/6 50/5 50/9 50/13 52/16 52/18 55/21 61/2 61/11 61/12 62/3 65/1 65/17 65/20 65/21 66/1 67/21 68/9 69/18 70/3 71/6 75/21 78/12 78/14 78/17 78/20 79/11 80/17 81/10 82/15 82/17 83/24 84/1 84/2 84/18 87/22 87/24 87/24 88/6 88/7 88/8 89/4 90/2 91/7 91/8 92/24 93/3 93/4 94/13 94/14 95/21 97/8 97/9 103/13 103/23 104/1 104/12 105/6 107/17 112/6 112/7 112/12 112/13 112/15 113/4 113/15 115/7 116/6 116/7 116/8 116/12 116/16 116/22 117/3 118/21 128/5 128/8 128/24 130/10 130/17 131/9 131/14 132/7 139/7	POL00121607 [1] 35/21
paragraph 20 [1] 20/3	Pardon [1] 124/18	period [17] 3/22 15/5 35/3 43/14 64/19 70/17 80/8 84/17 89/24 91/12 91/16 92/23 94/12 97/1 97/12 108/3 108/11	pledged [2] 65/11 125/5	police [73] 12/17 14/23 15/9 16/12 17/16 18/23 19/1 23/1 29/5 29/8 31/13 32/17 32/18 32/18 32/19 32/20 32/22 32/25 33/2 33/6 33/10 33/15 34/14 34/15 34/16 35/9 35/10 39/12 39/19 39/21 39/23 46/14 46/23 47/1 47/5 47/7 53/12 54/3 54/14 54/16 54/23 54/23 55/12 56/15 56/16 58/23 59/7 59/13 60/3 62/24 63/2 63/10 63/12 63/18 63/19 63/21 63/21 63/22 63/24 64/1 64/3 64/10 83/18 87/1 87/3 87/6 114/21 116/5 127/4 127/20 127/20 128/1 132/25
paragraph 23 [2] 27/25 31/22	part [12] 11/23 12/21 24/14 25/13 30/21 55/9 73/2 90/19 107/19 119/11 119/14 126/5	performance [1] 25/13	pleading [1] 135/10	polices [5] 14/9 15/3 16/4 16/15 16/20
paragraph 27 [1] 13/25	Participant [2] 115/14 115/16	periods [1] 75/4	plus [1] 120/16	policy [12] 14/20 15/6 15/15 15/17 16/1 16/3 16/9 16/10 16/16 16/23 17/2 17/9
paragraph 28 [2] 17/11 17/13	Participants [4] 1/14 120/3 139/6 139/25	permission [3] 2/9 13/9 122/10	pm [6] 78/7 78/9 113/17 113/21 114/1 140/9	Poor [1] 91/3
paragraph 29 [4] 47/8 48/25 55/21 59/15	particular [17] 24/11 44/18 51/5 58/18 58/20 60/5 72/8 73/18 74/17 75/20 84/10 87/10 88/12 89/24 107/13 118/4 129/5	person [37] 12/25 13/3 18/15 18/18 18/19 20/9 20/16 21/1 27/2 33/1 33/24 40/22 40/25 41/2 41/3 41/7 41/20 57/12 57/12 60/2 60/5 66/9 66/15 75/6 95/8 95/9 98/24 100/24 100/24 117/11 117/25 118/7 118/7 132/5 132/11 139/12 140/1	PNI00000001 [7] 104/1 112/6 112/8 115/7 118/20 130/11 132/4	position [4] 43/5 85/12 87/5 87/9
paragraph 34 [3] 43/1 43/3 82/17	particularised [1] 81/13	person's [1] 13/8	PO [2] 38/3 38/12	possibility [2] 59/4 92/17
paragraph 35 [2] 43/20 45/11	particularly [1] 110/1	personal [2] 26/8 68/1	POCA [1] 23/1	possible [5] 23/2 51/15 54/12 72/19 92/25
paragraph 36 [2] 52/11 52/18	particulars [1] 79/16	personally [3] 123/9 123/20 123/20	point [19] 21/20 24/4 26/17 41/10 41/20	possibly [4] 13/23 14/11 23/11 46/6
paragraph 37 [2] 59/22 61/10	parts [2] 17/22 19/5	persons [1] 22/22		post [141] 3/12 3/13 4/13 4/15 4/16 4/21 5/10 5/14 6/17 9/22 9/23 11/24 12/3 12/9 12/15 12/21 13/2 13/6 14/18 18/17 18/25 19/4 19/10 19/23 20/10 25/21 25/23
paragraph 39 [2] 28/23 28/24	parties [4] 25/18 27/14 45/4 57/20	persons/premises [1] 22/22		
paragraph 4.6 [1] 37/22	party [3] 11/16 11/21 19/12	Phase [5] 1/16 1/17 1/17 1/23 2/2		
paragraph 4.7 [1] 39/24	passed [1] 124/2	Phase 4 [3] 1/16 1/17 1/23		
paragraph 40 [1] 128/24	passing [1] 95/25	Phase 5 [2] 1/17 2/2		
paragraph 41 [2] 31/19 60/18	past [3] 53/21 75/15 123/8	phone [1] 105/4		
paragraph 5.10 [1] 91/7	pattern [7] 50/18 68/18 69/6 70/11 71/19 71/25 72/9	physical [5] 4/24 5/5 41/3 41/4 41/8		
paragraph 5.21 [1] 94/19	patterns [2] 50/18 98/13			
paragraph 5.25 [1] 94/14	pause [1] 110/1			
paragraph 5.6 [1] 90/24	Pausing [4] 28/7 43/18 91/18 129/8			
paragraph 50 [1] 75/23	pay [1] 65/12			
paragraph 54 [3] 91/19 92/24 93/2	payments [4] 66/4 96/7 97/12 99/4			
paragraph 59 [1] 133/17	pdf [2] 130/11 132/4			
paragraph 70 [1]	peak [1] 46/5			
	pen [1] 129/16			
	Penny [2] 60/8 61/13			
	Penny Thomas' [1] 61/13			

P	1/15	proceedings [3] 123/21 124/12 140/2	prosecutions [10] 29/20 29/20 29/24 30/1 30/8 31/13 35/13 37/5 63/17 122/20	71/11 74/25 75/5 86/20 87/2 106/1 106/10 113/12 121/5 126/7 137/24 138/19
post... [114] 26/4 27/21 27/22 28/13 29/1 29/6 29/6 29/7 29/14 30/4 30/7 30/9 30/11 30/13 30/13 30/17 31/6 31/14 32/15 32/23 33/6 34/12 36/23 37/21 38/1 38/24 39/3 40/17 40/21 41/1 44/18 46/2 48/6 48/8 51/2 53/16 54/8 58/15 64/14 70/6 75/20 78/23 79/6 80/5 80/21 81/12 81/20 81/23 82/4 82/13 84/15 85/11 85/15 85/25 86/4 86/9 86/13 87/7 88/18 89/12 91/11 91/13 92/21 94/23 95/10 95/23 95/25 96/19 96/22 99/19 100/5 102/13 102/19 103/6 103/9 104/19 104/21 106/9 106/11 108/5 108/9 111/23 116/4 118/24 119/6 120/10 120/12 122/8 123/3 123/22 124/11 124/22 125/6 128/16 128/18 128/20 128/22 129/11 129/12 129/25 130/2 130/3 134/17 134/20 134/24 135/4 135/9 135/15 135/24 135/25 136/13 136/16 136/20 137/6	premises [3] 13/7 13/8 22/22	process [18] 27/20 29/2 29/5 30/5 30/7 31/3 31/18 32/7 32/9 35/15 35/17 37/13 38/20 39/8 39/18 61/4 61/6 77/12	puts [1] 80/20	
postage [1] 106/13	prepare [1] 54/6	processes [1] 38/8	Prosecutor [1] 1/8	putting [6] 13/21 35/9 66/2 102/2 117/25 132/5
posted [2] 6/15 30/25	prepared [5] 28/2 34/24 39/15 130/24 131/5	processing [2] 37/14 76/5	Prosecutors [1] 37/6	
postmaster [2] 65/4 79/7	preparing [3] 54/5 56/14 105/11	Procurator [1] 37/8	protocols [3] 56/5 57/4 57/6	
postmasters [3] 70/15 71/2 73/8	presence [2] 134/20 134/20	produce [4] 32/5 35/5 36/24 56/1	prove [5] 50/20 51/3 52/7 129/4 129/15	Q
potential [1] 37/13	present [4] 33/13 84/23 89/17 104/23	produced [12] 32/2 52/25 56/11 60/11 64/3 97/10 100/25 104/21 107/25 116/2 123/2 127/22	proved [1] 52/9	quality [2] 35/22 96/16
pouches [1] 117/2	presentation [1] 33/8	program [1] 16/19	provide [8] 5/2 38/9 40/5 40/7 50/21 62/12 62/15 86/18	queries [1] 7/25
powers [1] 23/1	presented [2] 131/13 135/4	programme [1] 138/2	provided [27] 3/6 12/17 14/10 31/21 41/20 52/12 52/15 52/21 53/6 54/11 55/10 55/16 55/17 59/23 60/2 61/16 64/1 64/5 88/3 91/15 92/22 94/18 112/10 114/9 120/14 120/16 133/24	question [25] 11/17 43/14 43/18 47/17 51/9 52/8 52/16 69/18 73/4 73/12 92/5 92/7 101/25 102/5 105/6 111/7 111/8 111/14 121/24 122/1 132/16 133/15 137/5 138/4 138/17
PPS [29] 17/18 18/3 18/7 18/11 35/3 35/6 37/11 37/16 37/18 38/16 39/4 39/16 46/23 47/1 52/14 52/23 52/24 53/4 53/5 54/11 54/25 55/11 55/16 62/13 63/8 112/6 112/12 114/16 116/2	pressure [2] 24/8 24/12	progress [4] 29/10 43/24 46/21 101/18	PSNI [30] 17/15 18/3 18/7 18/10 29/7 30/14 32/3 32/3 32/10 33/16 33/19 34/10 35/6 35/7 37/9 38/15 53/10 54/10 55/11 55/16 62/5 62/10 62/13 63/7 112/5 112/12 114/16 116/2 120/10 120/15	questioned [8] 2/11 120/7 122/2 122/3 125/21 141/4 141/5 141/6
practical [1] 16/13	presumably [2] 69/10 114/16	progressed [5] 3/19 30/4 31/11 62/5 101/19	Public [29] 1/8 1/9 17/19 18/24 29/8 29/17 29/20 29/20 29/24 30/1 30/14 31/13 32/6 33/14 35/1 35/11 35/12 37/10 46/15 55/8 59/7 62/8 62/8 62/8 62/9 63/17 63/20 64/8 122/20	questions [13] 2/14 102/2 115/12 115/15 115/16 115/23 126/20 134/4 135/22 136/25 138/23 139/4 139/5
practically [1] 136/21	presume [1] 69/10	prompt [2] 20/19 21/13	Public Prosecutor [1] 1/8	quickly [2] 130/10 130/15
practice [6] 10/21 14/21 15/9 26/18 70/23 71/17	presumption [2] 50/24 51/16	prompted [2] 14/14 118/22	Public [29] 1/8 1/9 17/19 18/24 29/8 29/17 29/20 29/20 29/24 30/1 30/14 31/13 32/6 33/14 35/1 35/11 35/12 37/10 46/15 55/8 59/7 62/8 62/8 62/8 62/9 63/17 63/20 64/8 122/20	quite [9] 34/1 44/12 46/6 46/16 57/22 57/23 64/4 119/17 135/12
pre [1] 35/3	previous [5] 53/25 61/24 75/23 95/10 96/6	prompts [2] 21/9 21/11	published [2] 2/3 3/7	quote [1] 127/14
predominantly [1]	previously [4] 29/4 38/16 92/2 110/9	prone [3] 81/19 82/12 85/8	pull [1] 61/11	quoted [1] 61/25
	PRICE [6] 2/11 115/8 125/10 126/5 139/20 141/4	pronged [1] 23/14	purpose [6] 8/8 56/22 56/25 57/1 90/23 98/20	R
	Price's [1] 102/1	propose [1] 121/2	purposes [4] 1/17 3/3 88/3 90/17	raise [2] 93/6 94/6
	Principal [1] 1/8	prosecute [2] 87/17 117/16	pursue [2] 10/24 21/16	raised [16] 38/16 43/11 51/5 72/21 75/8 75/14 76/17 77/2 99/24 110/2 111/7 111/14 118/15 130/17 131/25 136/10
	printed [1] 8/20	prosecuted [8] 29/19 61/5 65/5 82/21 83/2 83/14 103/15 136/23	pursuing [1] 24/22	raising [5] 93/11 94/2 111/8 124/3 131/23
	prior [1] 84/12	prosecuting [4] 87/6 101/3 101/13 114/21	push [1] 47/3	Randalstown [1] 3/13
	proactive [1] 25/19	prosecution [55] 1/10 11/9 17/19 18/11 18/24 19/1 24/2 27/21 28/8 28/12 29/2 29/9 29/17 30/14 32/6 32/7 33/8 33/14 34/20 35/2 35/11 35/12 37/10 38/10 38/13 43/25 46/15 46/22 46/25 49/23 54/25 55/8 56/14 58/6 59/7 59/24 61/16 63/15 63/20 64/6 64/8 65/2 83/19 87/2 87/4 101/23 102/1 102/4 102/10 103/14 117/14 118/3 122/6 132/15 134/10	pushing [4] 46/7 46/13 46/14 46/15	random [1] 128/21
	probably [5] 72/1 106/14 106/15 127/12 130/12	proceed [1] 2/6	put [32] 24/8 24/13 26/9 28/8 29/5 29/12 30/5 31/19 32/7 34/19 34/24 35/11 42/9 48/12 51/18 54/24 57/8 67/24 70/4 70/19	rarely [2] 81/19 82/11
	problem [10] 74/17 76/9 77/16 77/23 108/22 111/2 113/16 127/12 127/13 138/21	proceeded [1] 63/25		rate [2] 22/17 23/9
	problems [37] 43/9 43/23 45/13 45/21 66/23 67/1 67/2 67/8 67/13 68/6 69/16 72/7 72/9 73/12 74/20 76/17 81/21 81/24 81/25 82/1 82/14 84/22 85/17 85/24 86/15 94/25 95/15 107/13 107/15 110/7 110/10 111/4 114/7 119/2 119/6 119/10 136/10	proceeding [1] 63/5		rather [10] 4/9 15/10 18/24 39/22 52/8 99/8 116/15 118/13 125/16 127/23
	procedure [5] 10/20 12/10 18/23 70/15 106/6			re [1] 49/7
	procedures [3] 16/24 25/22 120/12			re-read [1] 49/7
	proceeded [1] 63/25			reached [6] 42/12 46/5 46/19 46/25 100/23 118/2
	proceeding [1] 63/5			

R	110/5 110/5 121/4 138/14	66/23 79/16 112/10	23/24 32/15 32/23 105/2	115/4
reaches [1] 53/17	receiving [1] 54/8	referring [9] 36/10	remained [1] 5/9	representation [1] 105/4
reaching [1] 118/4	reciprocated [1] 40/10	46/20 53/4 58/4 60/1	remaining [1] 1/24	representatives [1] 100/5
read [13] 1/19 1/20 2/1 7/25 8/21 33/13 49/7 76/2 76/19 126/8 127/23 133/25 139/10	recognise [3] 17/5 17/7 52/4	60/5 75/25 76/20 77/5	remedied [1] 81/25	request [10] 8/19 8/25 43/13 44/4 44/12 47/6 49/14 58/23 118/21 133/24
reading [2] 77/8 116/15	recognition [1] 23/3	reflect [1] 80/6	remember [24] 7/5 28/21 36/22 45/16 48/18 48/21 57/22 57/24 58/4 58/5 87/18 95/17 110/22 111/8 111/17 111/23 118/16 122/13 122/19 123/6 123/19 131/21 135/11 135/15	requested [25] 9/8 34/20 42/25 43/19 43/22 43/25 44/1 44/12 45/7 45/12 46/24 47/2 47/11 49/10 56/7 59/17 73/5 86/11 86/17 86/25 92/19 122/10 122/10 122/13 122/14
ready [1] 33/8	recollection [7] 15/8 82/25 83/9 83/15 133/18 133/19 133/22	reflects [1] 51/16	remind [3] 20/15 21/1 118/17	requesting [1] 112/1
realised [3] 44/16 105/22 129/25	recommend [3] 33/16 38/23 40/13	refresher [4] 14/1 14/4 14/6 14/14	remittance [2] 42/9 53/18	requests [11] 45/24 46/2 46/4 46/11 46/22 57/8 84/3 84/11 85/20 86/20 118/13
really [10] 7/20 8/10 12/12 26/24 30/22 69/15 73/1 105/18 110/8 119/21	recommendation [3] 39/2 39/5 40/11	regard [9] 12/3 33/21 34/4 47/10 49/9 51/21 76/9 77/16 86/12	remotely [4] 2/8 111/5 111/9 111/22	required [16] 21/18 24/19 32/5 32/9 32/13 38/12 55/4 55/7 57/16 58/2 60/2 62/20 82/9 90/17 90/22 98/19
reason [12] 24/10 24/11 58/23 59/2 69/3 72/3 89/18 91/25 107/10 115/12 116/19 127/5	recommendations [1] 28/3	regarding [14] 32/20 38/10 38/11 42/2 53/14 58/1 60/12 75/9 93/7 94/22 96/21 97/6 117/4 117/20	rendered [3] 117/13 118/3 132/14	require [3] 56/6 57/4 99/6
reasonable [6] 10/24 20/14 20/25 21/7 69/23 71/18	recommended [3] 33/20 38/20 38/25	regardless [1] 74/20	reorganisation [3] 4/14 4/23 5/6	required [16] 21/18 24/19 32/5 32/9 32/13 38/12 55/4 55/7 57/16 58/2 60/2 62/20 82/9 90/17 90/22 98/19
reasons [3] 72/19 116/15 127/1	reconciliation [2] 94/22 96/21	registered [1] 89/16	repay [1] 23/21	requirement [1] 60/19
rebranded [1] 134/25	reconciliations [1] 97/7	registrar [1] 116/6	repeat [4] 11/17 49/5 52/16 101/8	requires [1] 84/5
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	reconciled [3] 33/20 38/20 38/25	reinforced [1] 120/23	repeated [4] 47/21 47/22 47/23 120/23	requiring [1] 42/2
rebranded [1] 134/25	reconciliation [2] 94/22 96/21	related [3] 58/8 97/6 99/21	report [80] 20/13 32/2 32/4 32/10 32/16 35/5 35/8 35/18 38/16 39/5 39/24 53/9 54/5 54/7 56/4 56/22 57/1 63/6 63/20 87/16 87/21 87/21 87/25 88/2 88/6 90/4 91/7 92/20 94/8 94/11 95/20 95/22 98/1 99/23 99/24 100/4 100/25 101/1 101/3 101/6 101/9 101/16 101/21 101/22 101/23 102/13 102/18 103/3 103/6 103/10 113/22 116/1 116/7 116/10 116/10 117/20 119/1 121/12 121/23 121/23 122/2 122/19 123/22 123/24 124/3 124/7 124/19 124/23 125/3 125/6 126/24 127/15 127/19 127/21 127/24 127/25 132/3 132/19 132/24 136/11	resilience [2] 40/5 40/12
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	reconciliation [2] 94/22 96/21	relate [2] 51/14 103/17	respective [1] 101/3	respect [3] 58/9 83/4 133/4
rebranded [1] 134/25	reconciliations [1] 97/7	relates [1] 92/7	respective [1] 101/3	response [5] 40/16 51/8 66/23 68/16 103/10
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	record [9] 1/19 2/2 11/3 72/13 98/4 98/5 104/7 107/18 108/18	relating [5] 54/12 66/3 114/18 114/18 119/5	respective [1] 101/3	responsibilities [1] 10/19
rebranded [1] 134/25	recorded [4] 50/15 91/11 104/7 107/18	relation [19] 56/18 79/8 86/11 88/10 88/11 88/19 88/20 89/10 89/13 90/1 94/18 96/18 98/14 119/2 119/7 119/10 126/5 128/6 133/16	respective [1] 101/3	responsibility [1] 99/12
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	recorder [1] 104/25	relevant [13] 1/15 1/16 13/21 15/6 17/22 19/6 19/13 37/16 63/7 84/17 99/17 99/17 112/4	respective [1] 101/3	responsible [2] 89/2 95/6
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	records [5] 6/12 6/13 53/21 118/24 119/5	reliability [5] 49/2 84/8 99/24 121/5 122/4	respective [1] 101/3	restricted [2] 98/2 99/14
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	recover [1] 23/5	reliable [26] 9/11 9/13 9/17 10/3 34/6 34/18 47/13 48/2 48/4 48/9 48/11 48/23 49/12 49/16 49/21 49/25 55/14 57/2 59/14 77/1 86/10 110/12 111/13 120/21 121/25 137/22	respective [1] 101/3	result [7] 1/21 5/5 86/7 86/8 91/2 96/3 96/23
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	recovery [6] 22/16 23/2 23/3 23/7 23/9 25/14	reliance [4] 50/11 51/9 73/18 110/14	respective [1] 101/3	resulted [3] 72/5 72/6 99/3
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	recovery/asset [1] 23/3	relieved [5] 56/19 56/20 58/25 87/17 118/12	respective [1] 101/3	resume [1] 42/15
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	rectified [1] 80/12	rely [3] 52/14 120/10 133/23	respective [1] 101/3	retail [6] 42/8 53/23 74/11 95/5 95/7 95/12
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	rectifying [1] 98/13	relying [1] 119/16	respective [1] 101/3	retention [1] 94/12
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14/5 14/6 14/8 14/10 14/13 14/16 24/6 24/10 33/19 34/10 34/13 34/22 37/15 39/9 43/14 43/21 45/11 45/15 45/17 47/10 48/8 49/9 52/12 52/21 56/3 56/5 56/12 57/5 57/14 57/21 57/23 58/23 60/6 60/14 60/16 64/6 73/24 74/10 76/11 76/15 82/19 82/20 82/21 85/20 85/21 86/19 87/19 92/15 93/15 94/6 100/2 100/8 100/9 100/13 100/14 100/18 100/18 100/21 103/9 110/4 111/14 112/3 112/3 114/13 114/23 114/24 119/11 119/12 119/15 122/18 124/21 125/1 130/8 130/9 134/4 134/6 134/6 134/7 134/8 134/10 134/12 134/12 134/13 134/14 134/18 135/2 135/3 135/6 135/9 135/17 136/4 137/3 137/3 137/25	redo [1] 106/5	remain [5] 20/12		
recall [100] 10/15 10/18 10/23 11/2 11/3 11/8 14				

R	routines [1] 15/11	101/21 102/23 104/14	12/23 12/24 13/1 13/3	sending [2] 47/18
return [4] 22/17	Royal [27] 4/1 4/9	108/25 109/8 109/15	13/7 13/8 13/9	123/19
112/19 112/20 135/7	4/10 4/12 5/20 5/23	116/18 117/23 118/11	searches [3] 12/21	senior [11] 14/11
returned [2] 28/6	5/25 6/9 6/11 6/24	121/2 121/8 122/6	13/5 22/21	23/10 24/9 31/14
134/14	9/21 12/6 12/8 12/14	126/10 126/19 127/4	second [11] 20/7	47/14 47/25 48/10
revealed [1] 136/19	28/13 29/4 35/24	128/1 130/17 130/20	65/24 71/6 74/19	75/9 100/5 120/23
review [9] 11/4 28/4	35/25 36/21 36/21	131/2 131/9 131/18	103/25 107/18 119/1	123/22
96/18 98/2 98/12	36/22 37/17 37/24	132/13 133/21 136/5	120/19 123/7 123/7	seniors [4] 73/7 74/4
98/25 99/2 135/25	38/20 42/9 102/14	137/17 138/8 138/11	123/14	87/9 110/17
136/3	111/18	138/18 138/19 138/22	secondary [1] 118/20	sense [2] 16/13 21/7
reviewed [1] 43/13	Rule [1] 20/10	139/2 139/2 139/7	secret [1] 125/17	sent [14] 16/13 16/15
reviewing [1] 11/11	running [1] 54/1	139/8 139/9	section [7] 1/9 65/6	17/5 17/8 19/9 32/17
rewarded [1] 25/23	rustling [1] 108/16	saying [32] 34/10	76/3 78/20 95/20	53/10 63/7 81/23
rid [1] 108/10	S	44/10 45/3 45/14 48/1	103/16 107/18	112/5 123/3 124/4
right [77] 3/10 3/14	safety [1] 13/4	48/23 49/1 71/1 71/4	section 1 [1] 103/16	124/23 134/1
3/18 3/20 3/23 4/2 4/7	said [49] 4/5 8/6	73/16 76/24 77/4	section 17.1 [1] 65/6	sentence [2] 49/13
4/7 4/8 4/17 4/19 4/25	15/21 21/14 34/16	77/19 77/22 83/5	section 6 [1] 95/20	51/14
5/1 5/7 5/8 5/9 5/21	45/11 46/17 48/8 53/1	92/13 94/1 94/3	sections [2] 72/22	sentences [2] 48/24
6/1 6/2 7/12 7/15	54/21 55/12 55/19	108/23 109/6 109/16	73/1	49/7
12/13 13/11 13/14	56/16 63/19 65/7	109/20 110/6 110/20	Secure [1] 3/19	separate [1] 93/10
17/20 18/8 21/12 23/6	70/12 73/23 79/18	122/25 123/12 128/3	security [39] 4/1 4/16	September [4] 67/17
28/7 29/23 32/10	91/24 92/12 93/16	128/4 135/2 135/3	4/24 5/5 15/4 22/9	103/18 103/21 134/5
40/24 42/5 46/17 53/6	103/6 103/17 103/18	135/9 137/13	23/10 24/12 25/20	September 2004 [1]
53/8 60/7 62/2 64/23	110/9 110/24 111/10	says [19] 37/4 37/22	28/3 28/9 28/16 28/18	134/5
65/15 66/5 66/6 66/14	111/16 111/22 120/19	39/24 68/22 70/8 79/8	28/20 29/1 29/4 29/7	series [2] 100/16
68/12 68/23 77/3	121/5 121/7 122/20	105/16 109/3 112/12	29/14 30/13 31/6 32/8	134/3
77/20 83/8 83/16	123/3 123/5 126/12	112/16 113/6 113/16	35/15 38/14 40/13	serve [1] 105/23
92/10 102/12 104/3	126/21 127/8 127/16	128/10 128/19 131/4	41/4 41/6 43/6 48/14	service [20] 1/10
104/8 104/11 107/4	133/16 134/19 134/23	131/15 134/19 135/13	48/15 48/20 48/21	17/16 17/19 18/23
109/13 109/18 114/21	136/18 137/4 137/9	135/18	102/22 102/25 103/4	18/24 19/2 29/8 29/20
114/22 114/22 118/14	137/18 137/21 138/5	scandal [1] 136/16	103/8 118/25 123/16	32/7 33/14 35/2 35/12
119/17 123/10 123/21	139/12	schedule [5] 109/1	123/22 137/18	35/12 37/10 39/21
125/18 126/9 126/15	Sales [1] 3/23	117/10 130/19 131/10	see [41] 1/3 8/13	59/7 87/6 114/21
127/12 127/17 127/25	same [9] 13/9 38/20	132/10	22/12 26/10 26/11	127/4 132/25
132/2 133/18 133/25	39/20 42/7 60/22 61/8	Schedules [1] 62/13	31/4 35/23 36/25 39/2	Service's [2] 101/3
135/7 139/7 139/20	61/20 86/8 132/21	school [6] 5/25 7/8	42/22 44/18 52/10	101/13
139/22	sat [2] 7/7 55/1	7/10 7/23 9/19 137/19	53/19 53/22 53/25	sessions [1] 47/21
rights [2] 20/10	satisfied [1] 54/24	Scotland [2] 37/7	61/24 62/1 65/21	set [16] 5/17 22/11
104/24	satisfy [1] 47/5	40/3	66/25 67/4 67/15	22/15 23/6 26/4 32/5
ring [2] 134/21	saw [2] 67/4 126/8	Scott [11] 28/21	74/12 75/13 75/19	39/8 42/11 71/23
135/20	say [110] 4/5 5/23 6/3	48/20 103/2 123/5	78/10 78/19 86/23	78/19 79/12 79/15
risk [4] 6/5 38/18	6/20 6/25 12/12 15/2	123/8 123/10 123/13	87/25 94/19 104/4	82/25 88/22 89/20
38/24 43/5	16/6 17/13 18/12	123/20 137/12 137/17	106/25 108/21 110/17	95/20
RM [1] 40/6	19/22 20/5 20/24 25/8	138/1	111/1 114/5 116/1	set-up [1] 42/11
RMG [4] 37/5 37/11	27/24 28/16 28/25	Scottish [1] 16/7	117/3 130/1 131/25	setting [2] 74/18 82/2
38/8 40/13	30/12 30/20 34/5	screen [31] 1/12	132/8 132/16	seven [1] 50/14
RML [3] 37/23 39/1	34/17 34/19 34/24	14/25 16/25 17/11	see-saw [1] 67/4	sham [2] 134/21
40/9	35/14 41/16 43/3	22/8 22/12 26/7 27/23	seek [2] 58/9 122/4	134/24
road [2] 26/21 73/20	43/20 47/9 48/19 49/8	28/23 35/20 43/1 47/8	seeking [2] 118/19	share [2] 102/13
Rob [1] 135/23	49/20 49/23 49/25	50/5 50/9 55/21 65/19	119/4	102/19
robberies [2] 4/25	50/14 52/11 52/13	75/21 78/13 82/15	seem [6] 49/13 60/5	shared [3] 40/15
41/4	52/20 55/23 57/23	83/24 87/22 92/24	94/1 94/3 104/6	102/21 103/3
robust [3] 22/16	58/17 58/20 59/14	104/1 112/6 112/20	117/23	she [26] 103/21
136/25 137/14	59/15 60/6 60/10	115/7 126/8 127/1	seemed [2] 58/13	105/15 107/1 107/2
role [18] 3/19 3/23	60/17 60/18 61/7	130/15 131/22 132/6	66/22	107/3 109/16 109/17
3/23 4/1 4/8 4/19 4/24	61/14 62/3 62/11	scribbles [1] 63/1	seems [6] 21/8 51/14	109/20 110/7 110/7
5/2 5/4 6/3 10/11	64/16 66/20 68/20	scroll [2] 97/8 98/1	61/19 68/22 131/3	110/9 113/1 113/22
10/12 19/19 19/23	73/21 74/23 75/24	scrolling [15] 15/1	131/19	114/1 116/20 117/7
20/6 41/21 79/2 84/20	76/2 76/3 77/13 80/1	36/5 43/3 78/19 84/1	seen [8] 26/6 111/6	126/12 127/6 127/8
roles [2] 3/11 3/22	80/5 80/9 80/13 81/14	84/17 87/24 88/7	114/25 119/13 125/13	127/15 128/10 128/19
Roman [1] 84/4	81/20 82/12 82/18	109/3 112/12 116/3	125/15 127/1 137/1	129/21 131/18 135/13
round [2] 52/5	83/4 90/7 91/18 93/5	116/6 116/8 117/3	send [6] 21/4 32/9	139/12
119/20	94/17 95/15 95/17	132/8	114/23 123/22 125/6	she'd [2] 110/6
		search [8] 12/13	125/7	110/10

S	sir [26] 1/3 1/6 1/13 2/8 42/12 42/17 42/22 78/2 78/3 78/5 78/10 101/24 112/18 115/11 115/16 115/25 119/22 120/1 120/6 125/13 125/15 125/22 135/22 139/6 139/21 140/6	132/7 132/8 132/21 133/6 136/22 139/17 Social [1] 118/25 software [1] 96/12 solicitor [8] 39/11 39/13 39/16 39/22 118/19 129/14 139/16 139/17 solicitors [3] 78/16 87/15 100/3 some [18] 7/23 9/4 13/19 14/9 34/23 39/10 47/1 68/23 75/4 76/14 82/19 84/10 106/6 106/17 112/4 122/2 135/12 138/2 somebody [1] 48/21 someone [16] 19/15 23/20 28/18 45/5 45/20 52/6 60/14 69/11 74/4 87/11 105/4 111/4 131/11 131/19 132/18 137/13 something [15] 16/21 48/1 48/7 59/5 74/7 111/6 112/21 118/9 118/10 130/7 131/20 132/22 132/23 136/1 138/22 sometimes [7] 16/8 34/1 41/17 53/1 77/7 107/2 109/24 son [1] 129/6 sorry [29] 11/17 14/16 25/5 48/6 48/12 49/5 50/5 52/2 52/10 52/16 59/21 60/16 61/2 70/10 92/12 93/14 94/7 95/19 97/8 101/8 101/20 119/12 125/1 135/17 136/22 137/23 138/18 138/19 138/25 sort [5] 7/17 17/8 52/2 74/24 106/23 sorted [1] 75/6 sought [3] 17/22 45/5 119/9 sound [1] 5/7 source [1] 82/1 speak [3] 42/1 115/10 125/17 speaking [1] 48/15 special [1] 104/18 specific [5] 3/8 14/17 15/13 16/24 18/22 specifically [3] 37/21 39/3 79/23 spent [1] 138/8 SPM [6] 43/6 43/22 50/16 50/21 52/12 52/22 SPM/SPMs [1] 43/6 SPMs [3] 43/6 82/19	83/5 spoke [2] 27/6 75/17 spoken [4] 24/17 26/23 53/21 95/5 spotted [2] 130/4 130/8 spring [1] 19/14 stable [4] 67/6 67/17 67/18 74/6 staff [12] 18/20 27/22 40/15 64/14 72/7 72/10 76/7 77/15 93/7 96/16 100/17 107/16 stage [9] 4/19 23/22 47/7 63/6 66/2 70/1 80/12 85/23 110/4 stages [1] 106/2 stakeholder [1] 22/20 stakeholders [2] 26/22 26/23 stamps [2] 106/9 106/13 stand [2] 59/2 62/6 standards [9] 15/7 16/2 16/3 16/9 16/11 17/9 24/18 24/20 36/16 start [12] 31/24 44/13 48/7 48/7 65/17 67/1 69/8 92/1 93/4 103/23 109/23 118/18 started [2] 3/12 58/21 starting [4] 3/11 55/22 68/17 116/13 starts [3] 23/14 69/11 93/3 state [3] 57/2 87/10 92/1 stated [11] 31/10 76/7 77/14 82/7 98/16 99/4 104/17 108/3 108/8 116/20 127/6 statement [100] 1/5 1/7 1/11 1/13 1/25 2/3 2/16 2/19 2/25 3/4 3/6 4/5 5/3 5/18 5/24 6/4 6/20 6/25 7/16 9/15 13/25 14/24 17/12 17/12 18/13 19/21 20/4 27/24 28/24 31/20 31/22 34/5 34/15 34/17 34/20 34/22 34/23 34/25 39/9 39/18 43/2 44/21 45/23 47/9 49/24 50/10 52/11 55/20 55/22 56/1 56/10 56/17 57/17 58/2 58/5 58/24 59/13 59/22 59/24 60/2 60/15 60/18 61/16 62/4 64/18 75/22 78/13	78/17 79/5 82/16 82/24 83/10 83/11 83/16 83/21 83/25 84/3 88/4 91/18 93/19 118/11 121/4 121/8 122/12 122/14 122/15 122/16 122/17 122/21 122/22 122/25 123/1 124/8 125/11 128/6 133/17 136/15 136/18 137/4 141/2 statements [16] 8/14 33/23 34/1 34/2 53/14 56/8 57/14 57/19 57/20 57/22 57/25 58/1 58/8 60/12 127/22 139/10 states [1] 117/7 stating [1] 125/4 staying [1] 74/3 stealing [1] 129/20 steps [2] 33/7 103/9 still [10] 20/16 21/1 79/1 79/10 83/10 101/17 105/22 128/13 129/4 129/17 stock [2] 104/22 113/19 stolen [3] 23/5 51/3 52/7 stone [1] 26/24 stop [1] 92/4 stopped [1] 95/2 stops [1] 127/8 stores [2] 69/15 69/16 story [1] 86/8 straight [1] 25/9 strange [1] 131/3 struggling [1] 110/17 stuff [3] 105/23 106/5 106/11 stupid [1] 69/15 sub [2] 3/13 53/16 subject [3] 1/23 2/1 38/7 submission [4] 37/13 37/16 38/8 38/17 submit [1] 70/6 submitted [6] 37/12 38/19 38/25 39/4 84/16 116/10 subpostmaster [7] 45/13 51/17 51/25 77/11 99/11 110/2 110/24 subpostmasters [3] 7/9 64/13 85/25 subsequent [1] 14/1 successful [1] 3/25 such [12] 34/22 56/22 79/24 81/6 89/20 90/25 91/1 91/17 97/15 99/7
----------	---	--	---	--

S	8/10 8/12 8/16 9/11 9/12 9/16 10/1 12/5 16/14 29/3 34/9 36/9 36/14 36/15 36/20 38/17 43/8 45/6 47/6 47/12 48/2 48/4 48/9 48/11 48/23 49/2 49/11 49/16 49/21 49/25 50/12 51/10 51/15 51/22 55/13 56/16 58/3 63/23 66/8 66/11 66/17 66/24 67/3 67/11 67/12 67/25 72/22 73/10 73/13 74/19 75/2 75/7 75/14 76/9 76/11 76/18 76/20 76/21 76/22 76/23 77/6 77/7 77/9 77/10 77/10 77/16 77/18 77/21 77/24 81/17 81/18 81/22 82/8 82/11 82/14 85/7 85/10 85/17 86/10 86/15 89/19 90/7 91/5 91/10 91/13 92/18 95/23 96/9 96/13 96/17 96/19 97/7 98/3 99/6 99/8 99/13 100/11 100/15 100/22 107/14 110/3 110/12 110/18 110/22 110/23 111/3 113/13 113/24 118/8 118/9 119/3 119/8 119/10 120/20 121/19 121/25 136/6 136/11 136/24 137/13 137/16 137/20 137/21 138/21	117/21 126/6 127/22 taped [1] 76/19 tapes [1] 126/23 target [11] 23/7 24/4 24/5 25/14 25/16 25/17 25/23 26/4 26/14 137/1 137/2 targeted [2] 24/15 26/13 tarnished [1] 137/6 taught [4] 8/2 8/6 8/9 8/15 team [57] 4/1 4/17 5/9 12/6 14/4 15/4 15/5 15/7 16/2 16/17 18/12 19/4 20/8 22/10 23/10 23/17 23/24 24/2 24/9 24/12 25/10 27/10 27/10 28/14 28/18 29/1 29/7 29/7 29/15 30/9 30/11 30/13 30/14 30/17 31/6 32/8 34/21 35/15 38/9 42/7 43/6 44/6 44/7 44/9 47/25 57/11 75/18 86/18 86/21 102/15 102/16 103/4 110/20 110/20 116/9 120/16 135/6 technical [5] 22/20 56/9 58/13 60/15 122/7 telephone [1] 54/14 tell [4] 13/18 115/19 134/3 137/7 telling [5] 22/2 73/2 107/1 107/8 135/6 tend [1] 81/2 tending [4] 85/1 85/6 85/15 86/13 terms [18] 5/22 8/23 13/5 18/12 20/18 31/18 32/22 51/15 71/11 71/20 73/6 74/4 82/7 83/21 87/9 87/20 98/16 102/18 terribly [1] 35/22 test [2] 118/4 118/6 text [2] 113/16 113/20 Thames [1] 12/17 than [12] 4/9 15/10 18/24 39/22 43/17 52/8 99/8 107/6 116/15 118/14 127/23 130/1 thank [19] 1/4 2/5 2/12 27/1 28/22 42/18 42/23 78/6 78/11 103/12 104/3 115/25 120/5 120/8 125/9 125/19 139/22 140/7 140/8 that [717]	that I [1] 72/15 that's [81] 3/10 3/10 3/18 4/7 5/1 5/21 6/2 7/15 7/23 13/14 17/20 18/8 20/4 20/24 29/8 42/1 43/20 47/3 50/7 50/10 52/2 53/6 53/8 55/22 58/4 58/17 60/16 60/16 61/24 63/18 64/23 65/23 66/6 67/19 67/20 69/7 69/9 69/14 71/4 77/19 77/20 79/10 82/16 86/25 90/9 93/3 95/21 100/12 104/3 104/11 105/10 105/25 106/6 106/14 106/24 108/18 109/2 109/6 109/15 109/18 114/3 114/22 115/8 115/12 116/5 118/20 120/18 126/18 127/17 128/4 128/8 129/22 131/12 132/2 132/22 133/5 133/14 133/25 139/1 140/5 140/6 theft [11] 4/12 38/1 65/7 99/8 103/15 103/16 103/17 103/18 116/4 129/19 136/14 their [24] 12/21 15/10 20/7 20/9 25/20 25/21 27/22 43/11 44/5 55/2 56/6 64/14 70/21 91/14 92/21 101/18 106/10 113/17 115/23 128/17 134/14 138/10 138/12 139/17 them [45] 14/22 20/16 21/2 23/21 26/8 30/19 30/22 30/25 31/2 37/12 39/12 42/4 43/9 49/7 52/15 53/6 55/2 56/9 57/2 57/18 60/11 60/13 62/15 64/10 74/17 75/19 80/9 85/22 86/18 86/22 87/3 87/20 95/14 101/18 105/23 105/23 106/10 108/1 108/19 112/20 113/8 128/22 136/21 138/11 140/2 themselves [3] 20/7 100/21 109/18 then [117] 2/6 3/22 4/3 4/14 9/18 15/20 16/5 16/17 22/14 23/16 25/9 25/10 26/8 26/10 27/7 27/9 28/6 31/15 32/12 32/18 32/19 33/2 35/10 35/11 37/20 38/14 38/22 39/11 39/11	39/13 39/14 39/15 40/11 41/5 41/7 44/16 46/5 47/2 47/2 47/17 50/16 50/19 51/23 54/15 54/18 54/21 54/25 55/1 55/3 55/6 57/10 57/10 57/11 57/13 58/1 59/16 61/22 63/2 63/21 63/24 64/5 64/8 66/16 66/23 67/12 67/19 67/21 67/24 68/15 69/18 70/3 71/6 78/5 78/20 79/11 80/18 80/24 84/10 84/17 84/24 85/13 87/3 90/2 91/7 100/3 102/14 103/7 105/6 105/15 108/14 109/10 113/3 113/6 113/11 113/15 113/25 114/16 115/14 115/21 116/7 116/16 119/4 123/25 126/16 126/20 127/8 127/21 128/19 129/23 130/20 130/23 131/2 131/9 131/14 132/13 138/16 139/7 theoretical [1] 96/5 there [137] 1/12 9/23 10/2 11/25 13/25 14/2 14/8 14/17 16/7 17/21 19/2 19/12 20/5 20/14 20/24 21/6 24/4 24/7 24/8 24/12 24/20 25/7 25/7 27/3 28/7 28/11 29/1 30/7 31/12 33/11 34/1 36/3 36/7 37/15 39/20 40/1 40/6 40/8 41/2 41/5 43/18 43/25 44/14 44/16 45/23 46/1 47/24 49/13 49/23 50/1 50/17 50/18 50/23 51/18 53/11 53/22 54/4 54/6 54/24 55/4 56/5 57/22 57/25 57/25 58/2 58/18 59/4 59/4 59/11 59/19 59/22 60/14 61/15 63/4 63/11 65/24 67/10 67/11 67/15 68/9 68/15 71/3 73/12 74/13 74/14 74/17 75/1 75/3 75/4 76/8 76/13 77/15 77/23 79/9 80/20 83/5 84/10 86/3 88/9 91/18 92/4 92/17 93/5 93/21 94/4 94/11 94/21 95/14 96/20 99/10 106/19 108/21 108/22 109/4 109/5 109/5 112/15 114/5 114/7 115/3 115/14 115/16
	T			
	table [1] 113/3 tables [1] 114/6 tailor [1] 115/23 take [19] 5/17 14/5 18/21 33/7 34/2 35/1 63/9 68/13 70/19 78/3 81/1 92/4 105/23 112/21 113/12 114/10 122/16 129/6 131/22 taken [11] 1/21 5/11 8/6 17/15 80/18 80/24 97/25 98/24 103/9 113/9 136/14 takes [1] 81/11 taking [9] 6/4 16/23 30/21 49/22 73/14 80/7 96/6 107/6 127/23 talk [5] 48/7 48/22 105/8 108/13 130/23 talking [5] 14/7 47/19 67/10 77/9 139/9 tape [8] 77/8 104/7 104/25 107/18 108/18			

T	things [2] 66/13 67/3	59/25 60/9 61/17	126/5 126/6 130/2	transferred [1] 114/3
there... [15] 117/20	think [54] 4/6 13/19	62/24 63/1 63/23	136/25	transmission [1]
121/8 121/13 121/19	24/11 25/25 26/14	67/24 72/23 76/19	top [6] 69/18 69/19	38/15
122/12 129/8 131/10	27/17 36/20 39/10	77/8 80/22 82/23	75/22 82/16 93/4	trap [1] 135/10
131/20 131/25 135/24	39/19 41/12 44/7	83/10 86/17 86/19	116/6	travelled [2] 12/8
136/3 136/3 137/2	44/14 56/13 58/6	88/2 95/25 98/9 106/2	topic [4] 10/5 42/12	140/1
139/5 139/9	61/22 61/24 63/16	106/4 124/8 128/25	120/18 120/19	treated [1] 1/19
there's [9] 25/7 36/2	67/10 67/11 69/14	130/15 138/20 139/10	topics [3] 6/24 120/1	trial [11] 75/4 84/14
67/24 88/9 108/21	72/25 73/11 73/21	139/17	120/9	114/12 118/16 128/7
109/13 126/17 127/12	73/23 75/7 75/13 83/7	throughout [2] 18/16	total [3] 89/6 89/7	128/10 128/11 133/12
127/12	83/9 87/19 89/5 91/20	61/21	89/10	133/16 134/5 134/15
therefore [5] 33/6	91/25 92/12 100/9	thumbs [1] 78/4	totality [1] 80/14	tried [2] 103/19
89/25 98/10 98/21	104/2 104/8 110/9	tick [2] 131/5 131/10	totalling [2] 90/9	128/20
133/23	114/24 115/5 115/18	tie [1] 113/13	90/18	trouble [3] 107/2
these [29] 1/25 9/21	117/22 119/20 119/24	time [61] 6/14 13/19	totally [1] 42/10	109/24 110/3
16/13 24/14 26/2 38/3	122/15 123/10 125/17	18/16 23/20 31/6	totals [1] 88/21	true [1] 2/25
38/10 47/13 49/17	127/11 132/21 132/23	34/23 36/21 37/10	touched [1] 45/25	trusted [2] 134/25
66/7 66/12 72/10	133/3 133/14 137/11	39/10 39/20 40/2	towards [15] 10/25	136/20
80/10 80/11 82/21	138/13 140/5	41/10 41/14 41/18	11/14 11/19 19/21	try [9] 21/23 62/2
84/11 85/19 91/6	thinking [2] 77/9	42/13 42/14 43/22	21/17 31/20 36/7	81/23 105/17 105/25
95/22 97/16 98/4 98/7	111/12	44/14 45/12 53/2	61/12 66/18 93/2 93/3	106/6 106/11 106/13
99/10 108/23 108/24	third [7] 11/15 11/21	55/15 57/25 64/19	105/8 109/19 109/23	130/15
114/6 114/17 114/25	17/22 19/5 19/12	68/1 68/3 73/7 73/11	135/22	trying [11] 23/10
117/15	105/6 107/20	73/25 74/1 75/3 81/15	TP [1] 113/7	25/18 34/13 68/1 68/2
they [108] 3/2 7/24	thirds [2] 104/13	85/3 86/8 87/15 91/16	trace [1] 99/10	93/16 105/19 105/21
10/25 15/19 15/21	108/14	91/20 91/23 93/9	traced [2] 98/9 98/10	117/22 129/25 135/10
16/3 16/14 16/15	this [247]	93/13 93/18 94/9	track [1] 95/24	Tuesday [2] 140/3
16/18 19/10 20/8 20/8	Thomas [1] 60/8	106/4 107/9 109/25	trading [3] 8/13	140/11
20/16 21/1 23/11	Thomas' [1] 61/13	111/6 114/25 115/2	53/14 84/19	turn [8] 1/6 2/19 5/16
23/21 23/24 23/24	Thorpe [18] 13/12	116/15 120/4 121/8	trained [7] 7/9 7/10	19/19 35/23 62/3 65/1
24/11 24/19 25/10	Thorpe [18] 13/12	122/14 123/6 123/10	7/18 8/18 8/24 9/2	80/19
25/11 25/21 26/9 28/3	27/5 40/24 41/10	123/12 123/14 123/21	40/4	Turning [4] 14/20
30/19 30/20 30/23	41/12 65/18 65/23	124/7 124/9 127/1	trainers [7] 7/24 9/21	27/20 36/2 103/13
30/25 32/12 32/25	65/23 68/22 69/19	130/6 135/12	9/23 11/24 48/3	twice [1] 139/13
33/2 33/2 33/3 33/4	70/8 103/24 104/5	timed [1] 108/2	100/11 110/21	two [21] 3/19 12/25
33/7 33/10 33/11	104/6 104/15 108/15	times [5] 50/1 82/19	training [55] 5/17	22/13 23/14 24/25
33/18 33/22 34/4	109/3 124/10	95/13 111/11 120/24	5/22 5/25 5/25 6/7	25/11 40/2 48/24 49/7
34/22 35/11 41/5 46/5	Thorpe's [2] 116/9	timing [1] 72/8	6/16 6/20 6/21 6/25	51/6 51/12 66/4 67/13
46/16 47/1 48/14	124/11	title [4] 17/3 18/20	7/1 7/3 7/5 7/6 7/7	72/10 73/18 73/20
49/20 51/3 51/21	those [25] 1/20 10/15	35/24 35/24	7/11 7/17 7/19 7/20	74/9 92/2 104/13
51/25 52/7 52/24	15/24 19/15 19/16	today [6] 26/10 88/1	7/22 8/23 9/1 9/6 9/9	108/14 120/9
53/16 55/1 55/3 55/4	23/7 24/20 26/6 45/19	120/24 137/12 138/11	9/14 9/16 9/19 9/24	two years [5] 3/19
55/6 55/6 55/16 56/9	48/18 57/5 62/21	139/24	10/1 10/6 11/23 11/25	67/13 73/18 73/20
57/16 57/22 58/13	66/13 68/17 71/11	today's [2] 2/4 140/2	12/2 12/9 12/9 12/13	74/9
59/8 60/11 60/12 61/6	72/5 72/22 73/1 86/7	together [2] 63/2	12/20 13/11 14/1 14/2	two-thirds [2] 104/13
62/17 62/19 63/2	99/23 108/17 122/5	76/3	14/5 14/6 14/10 14/11	108/14
63/21 64/11 68/4	136/15 137/6 139/25	told [41] 9/9 9/10	14/15 14/17 15/19	type [2] 33/19 120/14
70/18 70/18 70/20	though [6] 1/22 8/23	9/12 9/15 10/7 10/15	15/20 47/15 47/16	Typical [1] 37/23
72/11 74/21 75/4	13/5 83/20 87/5	10/18 10/23 11/3 11/8	47/19 47/20 47/21	typically [2] 38/2
86/23 89/9 90/5 90/7	132/22	11/20 12/20 13/6	96/16 120/22 137/19	53/9
90/7 90/24 101/4	thought [10] 71/10	16/18 23/20 34/6 46/4	trans [1] 113/23	
101/14 101/16 101/17	71/17 73/17 74/7 92/7	46/9 46/12 48/3 56/10	transaction [13] 8/11	U
106/8 106/9 106/11	92/9 92/15 111/21	59/13 74/5 75/1 75/8	8/13 50/16 80/11	uh [1] 68/14
106/12 111/10 111/22	129/1 132/17	75/10 93/24 107/12	88/25 89/24 91/15	uh-huh [1] 68/14
113/23 114/19 115/1	three [9] 1/16 5/24	109/23 110/11 111/23	92/22 97/17 97/19	UK [4] 28/18 28/20
122/15 123/20 128/25	6/22 7/18 7/20 19/22	112/22 114/14 120/20	97/21 97/24 98/3	61/1 61/21
129/1 131/12 137/20	24/8 66/25 113/5	120/22 122/14 128/1	transactions [13] 8/5	ultimate [1] 99/12
138/2 138/8	three paragraphs [1]	128/2 135/13 137/16	43/14 43/23 80/10	ultimately [4] 54/10
they'd [1] 53/24	1/16	137/19	91/11 91/12 95/24	63/16 65/10 116/2
they're [4] 36/20	three-week [2] 7/18	too [3] 58/22 95/19	98/4 98/21 99/3 99/15	um [1] 68/20
109/2 119/4 138/6	7/20	137/11	100/16 121/22	unable [4] 31/4 38/9
they've [2] 100/23	through [37] 22/20	took [13] 5/6 30/7	transcript [7] 1/11	86/21 89/25
138/8	29/11 33/10 33/25	33/2 34/23 39/10	3/3 76/16 76/19 77/8	unaccepted [1]
	34/21 34/23 38/19	39/11 81/16 82/4 85/3	117/21 127/22	71/17
	44/8 44/25 54/17 57/9			

<p>U</p> <p>unclear [2] 15/22 70/22</p> <p>under [11] 10/20 20/16 21/2 37/12 51/8 88/8 89/6 90/3 91/8 99/4 108/5</p> <p>undermines [1] 84/7</p> <p>undermining [1] 11/9</p> <p>underneath [1] 19/3</p> <p>underpayment [2] 50/19 52/1</p> <p>understand [8] 24/13 41/24 50/15 56/22 62/20 68/8 93/16 102/5</p> <p>understanding [15] 29/10 29/13 29/18 29/22 30/10 30/16 30/22 31/5 31/7 31/15 51/14 63/13 89/7 101/21 109/20</p> <p>understated [1] 96/3</p> <p>understood [6] 54/7 59/13 71/19 76/6 78/23 78/25</p> <p>unexplained [6] 20/21 21/7 78/25 79/4 79/9 84/21</p> <p>unit [10] 17/24 19/7 19/8 19/8 19/11 19/18 33/22 34/3 116/14 118/25</p> <p>United [4] 27/14 44/19 60/22 61/9</p> <p>units [1] 89/15</p> <p>unless [1] 139/17</p> <p>until [14] 3/25 5/10 6/15 41/20 44/2 45/8 46/10 49/22 55/24 63/23 105/2 115/21 125/6 140/10</p> <p>unturned [1] 26/25</p> <p>unused [2] 11/8 62/13</p> <p>unusual [1] 89/19</p> <p>up [29] 1/12 20/4 26/2 31/25 35/20 42/11 43/18 48/13 61/2 61/11 67/4 69/15 69/16 78/4 91/11 97/8 101/18 102/21 103/7 104/21 113/13 116/6 125/4 126/25 128/25 132/5 136/10 136/12 137/6</p> <p>up' [1] 98/23</p> <p>updated [1] 130/19</p> <p>upfront [1] 68/11</p> <p>upon [7] 56/19 56/20 58/25 87/17 96/10 101/10 101/13</p> <p>upper [1] 48/17</p>	<p>ups [1] 92/2</p> <p>us [9] 1/3 22/3 24/11 42/22 48/22 49/20 78/10 108/16 114/14</p> <p>use [8] 15/23 44/20 44/22 44/23 60/23 81/18 82/9 85/7</p> <p>used [6] 15/13 15/25 52/4 72/6 77/6 129/16</p> <p>usefulness [1] 98/7</p> <p>user [3] 8/4 98/5 98/10</p> <p>using [4] 7/11 7/21 76/21 77/11</p> <p>usually [12] 10/8 14/11 15/6 15/21 16/6 16/9 16/11 44/8 52/25 95/11 105/17 106/18</p> <hr/> <p>V</p> <p>vaguely [2] 48/21 87/19</p> <p>valid [1] 97/17</p> <p>Valley [1] 12/17</p> <p>value [4] 80/5 80/7 81/12 89/16</p> <p>variance [1] 88/20</p> <p>variation [1] 70/17</p> <p>variations [1] 71/3</p> <p>various [4] 3/22 17/25 18/2 18/5</p> <p>vehicle [1] 13/10</p> <p>verdict [3] 103/20 134/15 135/7</p> <p>version [1] 112/8</p> <p>very [13] 1/4 2/5 67/3 67/4 79/11 105/15 120/8 125/9 130/2 130/10 132/5 134/16 140/7</p> <p>via [1] 37/9</p> <p>viable [1] 78/24</p> <p>view [20] 43/16 79/21 90/15 90/20 91/20 91/22 92/8 93/9 93/13 93/18 94/4 98/17 101/3 101/13 102/3 102/9 115/3 115/5 117/14 130/2</p> <p>viewed [2] 43/15 43/24</p> <p>visible [1] 2/21</p> <p>visibly [1] 135/18</p> <p>visiting [2] 20/8 74/12</p> <p>volume [1] 89/15</p> <p>voluntary [3] 5/11 13/9 21/13</p> <p>voucher [1] 97/18</p> <p>vouchers [5] 97/13 97/15 98/8 98/22 118/13</p>	<p>W</p> <p>wait [7] 44/2 45/8 46/6 46/10 46/13 46/18 125/6</p> <p>waiting [1] 130/14</p> <p>Wales [4] 15/11 15/20 16/5 61/6</p> <p>Walters [2] 121/13 124/24</p> <p>want [19] 44/24 45/9 45/17 45/18 47/5 72/12 107/23 121/22 126/4 126/7 126/24 130/16 133/10 138/11 139/2 139/4 139/8 139/9 139/14</p> <p>wanted [8] 31/2 33/4 44/20 44/23 57/9 57/13 57/14 139/11</p> <p>wanting [3] 51/24 64/24 113/7</p> <p>wants [1] 114/1</p> <p>was [497]</p> <p>wash [1] 107/11</p> <p>wasn't [30] 44/15 67/6 67/17 70/16 71/10 71/12 71/12 72/17 73/18 74/1 74/6 75/2 76/8 77/16 77/23 79/5 82/3 82/5 93/23 93/24 93/24 93/25 99/25 101/25 110/8 118/8 119/18 129/9 129/21 136/3</p> <p>way [31] 9/5 15/22 25/23 32/25 37/12 41/25 51/23 52/2 52/5 60/25 61/21 68/3 70/22 88/22 89/9 90/7 93/20 102/25 104/13 105/25 106/24 107/20 108/14 108/19 117/22 122/4 127/19 128/20 130/25 131/12 136/19</p> <p>ways [2] 60/22 61/8</p> <p>we [175]</p> <p>we'd [1] 104/24</p> <p>we'll [6] 34/7 51/12 79/8 87/20 125/13 140/3</p> <p>we're [2] 94/14 105/17</p> <p>we've [12] 45/4 48/25 70/16 72/23 80/22 83/21 127/1 130/12 131/23 131/23 135/23 137/1</p> <p>weaknesses [1] 98/25</p> <p>website [2] 2/4 3/7</p> <p>Wednesday [2] 105/10 105/13</p> <p>week [24] 7/18 7/20</p>	<p>8/14 88/19 88/21 89/8 89/13 95/13 105/9 106/12 106/17 106/23 107/4 108/4 109/4 113/9 113/9 128/13 130/23 130/25 130/25 131/16 131/20 131/23</p> <p>week's [1] 96/6</p> <p>weekly [5] 66/5 66/12 88/14 96/2 97/22</p> <p>weeks [6] 5/24 6/22 106/17 130/25 131/5 131/24</p> <p>well [45] 7/10 11/14 11/19 21/16 26/1 30/12 33/1 35/8 36/14 36/19 41/12 45/11 49/22 51/5 51/8 52/17 57/1 57/7 58/22 59/1 62/1 69/6 70/22 74/3 76/2 77/13 94/3 94/6 95/14 100/4 101/5 105/17 114/3 114/14 115/19 118/18 123/7 125/2 125/11 125/16 133/3 133/7 133/9 133/14 139/22</p> <p>Welsh [1] 37/5</p> <p>went [26] 14/12 15/19 38/19 39/16 44/8 46/25 48/2 54/22 54/25 62/23 63/1 63/21 63/23 64/19 67/12 103/5 104/20 112/20 123/13 123/24 123/25 125/3 125/3 125/8 128/25 137/10</p> <p>were [203]</p> <p>weren't [2] 87/5 114/7</p> <p>what [122] 6/6 7/3 7/17 8/2 8/8 10/15 12/20 13/6 13/18 16/1 16/16 19/7 20/24 22/2 24/15 25/16 26/11 26/12 26/18 26/23 27/2 30/23 30/25 31/18 33/3 33/7 33/19 34/6 36/9 36/12 39/14 41/19 42/11 42/14 44/18 45/17 46/20 47/5 51/15 51/20 51/22 53/9 53/19 56/22 56/25 57/5 58/17 59/8 59/12 60/23 61/24 62/6 62/20 63/14 66/21 68/16 68/20 69/9 70/15 70/15 70/18 70/20 70/22 70/24 71/1 71/4 71/16 75/8 75/10 77/4 77/13 77/19 79/8 80/22 83/4 83/7 86/7 87/9 95/7</p>	<p>100/8 101/3 101/6 101/9 101/19 106/12 107/7 107/11 109/20 109/23 110/4 111/2 111/10 117/22 117/24 118/22 119/24 122/18 123/6 125/4 126/8 126/22 127/8 127/15 128/2 128/3 128/4 128/6 129/25 130/2 131/22 133/5 133/23 134/12 137/7 137/10 137/10 137/16 138/15 138/16 138/20 139/2 139/7</p> <p>what's [2] 115/9 125/17</p> <p>whatever [6] 31/1 69/12 84/25 85/5 85/14 121/1</p> <p>when [59] 5/20 5/22 6/5 6/16 10/1 12/13 12/14 14/2 15/13 17/5 18/2 20/2 20/24 20/24 28/16 29/1 29/14 39/9 40/8 41/10 43/5 43/18 50/23 55/25 56/10 59/24 61/16 64/12 66/24 67/8 67/16 68/3 69/8 69/10 69/10 70/14 73/14 79/2 82/19 94/24 101/20 105/21 111/14 112/3 112/20 113/13 113/22 114/9 121/8 122/3 122/6 124/4 124/12 124/19 127/3 127/16 135/25 136/13 140/4</p> <p>whenever [39] 7/5 7/6 7/8 7/22 7/23 8/3 9/14 14/12 15/18 16/17 23/13 23/13 30/7 30/20 34/19 41/5 47/3 48/2 48/13 53/12 54/15 56/14 57/16 59/3 60/9 63/12 67/12 70/18 76/19 77/4 77/7 100/24 101/1 110/20 111/3 111/11 137/17 139/9 139/14</p> <p>where [51] 10/7 13/1 16/10 16/19 17/21 17/23 19/2 19/9 19/13 22/5 22/6 23/25 25/19 27/11 34/8 35/14 39/20 41/11 41/20 45/5 47/24 48/16 49/24 50/24 51/18 52/19 53/1 55/9 55/16 56/18 58/15 58/24 59/6 61/4 67/5 68/18 68/20 70/21 71/3 75/4 83/5 86/4 106/14 106/15 107/2 107/24</p>
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W	whole [8] 5/13 54/18 73/2 76/2 117/20 117/21 118/6 136/19 Whose [1] 44/4 why [21] 20/8 58/12 59/13 59/17 59/21 69/21 72/25 89/18 91/20 92/7 93/11 93/16 93/18 99/5 107/10 117/19 127/17 130/18 130/21 132/18 134/3 widely [1] 103/4 wider [1] 102/18 wild [1] 71/3 wildly [1] 70/17 will [18] 2/1 2/3 2/14 3/5 3/6 3/7 23/24 23/25 34/14 73/4 87/12 106/19 106/23 113/13 120/3 124/11 126/22 140/4 Wilson [1] 135/23 Winter [21] 2/6 2/8 2/10 2/12 3/4 42/24 78/12 91/18 92/4 120/2 120/9 122/17 124/9 124/17 125/9 125/23 132/19 139/3 139/7 139/22 141/3 Winter's [12] 1/6 3/4 14/24 17/12 27/24 28/24 43/2 50/10 55/22 75/21 82/16 119/24 wish [1] 140/2 wished [1] 36/25 withdrawn [1] 113/24 within [21] 8/7 9/3 14/3 14/9 15/5 15/22 18/7 25/20 37/17 39/19 40/6 43/6 54/2 56/13 73/13 86/4 87/7 87/23 95/23 102/19 103/6 without [2] 42/5 121/7 WITN03700100 [1] 128/7 WITN10280100 [1] 1/11 WITN10400100 [2] 3/4 14/25 witness [24] 1/5 1/7 1/13 1/25 2/3 2/15 3/6 5/3 6/4 39/17 44/21 56/1 56/10 59/23 59/24 60/1 60/7 60/19 60/24 61/15 61/16 128/5 134/11 141/2 witnesses [2] 84/8 134/8 word [2] 33/12 139/3	wording [2] 48/24 52/4 words [2] 21/19 127/13 work [11] 2/13 3/12 7/22 29/12 30/9 30/11 41/6 41/17 96/18 106/12 137/5 worked [15] 8/10 9/3 9/3 29/3 29/6 30/13 30/18 30/19 30/20 41/25 42/3 42/6 62/10 93/21 136/21 working [14] 3/17 7/1 7/3 14/3 15/5 18/14 34/18 44/19 55/24 59/6 69/11 95/2 95/9 136/6 workings [3] 88/19 89/12 89/14 works [1] 69/12 workshop [2] 14/12 14/14 workshops [3] 14/1 14/4 14/6 workshops/refresher [1] 14/6 worthy [1] 128/18 would [309] wouldn't [11] 30/19 45/19 52/15 58/20 61/23 64/7 64/21 71/23 93/14 109/17 125/1 write [1] 112/22 written [4] 31/5 31/8 31/10 31/12 wrong [19] 52/5 59/5 59/11 61/22 61/25 62/9 71/14 82/25 83/3 83/4 83/15 87/13 106/25 108/23 111/10 111/25 128/22 129/1 137/10 wrongfully [1] 136/23 wrote [1] 36/17 Wyn [1] 101/24	yet [2] 108/11 113/10 you [754] you'd [18] 24/24 26/23 40/22 45/18 46/18 46/18 52/18 53/19 53/21 53/21 53/24 64/23 64/24 107/9 107/10 109/8 121/4 126/10 you'll [1] 117/3 you're [32] 4/7 8/1 14/7 22/1 22/2 26/7 34/13 47/19 49/22 50/7 51/23 52/19 59/3 64/24 77/8 77/19 77/22 78/3 83/4 83/7 92/13 103/3 105/9 105/19 105/24 106/13 108/23 109/6 124/22 127/9 128/3 138/18 you've [17] 26/9 33/15 45/11 45/25 46/22 51/5 53/2 60/1 68/23 70/11 100/19 106/15 114/23 120/21 120/23 137/4 137/9 your [127] 2/9 2/16 2/23 2/25 3/1 4/5 4/19 4/24 5/2 5/13 5/16 5/18 5/24 6/20 6/24 6/25 7/11 7/16 8/23 9/6 9/15 10/1 10/12 12/8 13/11 13/13 13/25 14/2 18/12 18/13 19/19 20/3 21/8 21/14 22/1 22/12 25/5 25/13 25/14 25/18 27/3 27/13 29/22 29/24 34/1 39/8 39/17 40/23 41/10 41/21 45/3 45/23 46/7 46/16 51/14 52/11 53/3 53/9 53/15 54/2 55/9 58/8 59/8 59/22 60/18 62/4 63/6 64/1 64/25 65/1 65/3 65/18 68/13 69/20 71/22 73/18 82/25 83/10 83/16 87/8 87/8 88/3 91/18 92/24 93/18 101/10 102/3 102/9 103/13 104/24 105/9 105/12 105/20 109/20 111/25 112/13 114/11 114/15 114/19 114/25 115/3 115/9 116/1 116/8 116/21 118/11 119/15 121/3 123/3 123/25 124/9 126/24 127/4 127/7 127/15 127/25 132/24 133/16 134/20 135/6 135/19 135/19 136/11 136/14 137/4 137/5 137/12	Yours [1] 112/23 yourself [3] 40/22 98/18 139/23
		Z		
		zero [1] 89/14		