

Wednesday, 31 January 2024

1
 2 (10.00 am)
 3 MS PRICE: Good morning, sir. Can you see and hear us?
 4 SIR WYN WILLIAMS: Yes, I can, thank you.
 5 MS PRICE: May we please call Mr Shiels.
 6 SIR WYN WILLIAMS: Yes.
 7 KEVIN PHILIP SHIELS (sworn)
 8 Questioned by MS PRICE
 9 MS PRICE: Could you confirm your full name, please,
 10 Mr Shiels?
 11 A. Kevin Philip Shiels.
 12 Q. Thank you for appearing today to assist the Inquiry in
 13 its work. As you know, I will be asking you questions
 14 on behalf of the Inquiry. You should have in front of
 15 you a hard copy of a witness statement in your name
 16 dated 18 January 2024; do you have that?
 17 A. Yes, I do.
 18 Q. Could you turn to page 9 of that, please?
 19 A. Yes.
 20 Q. Do you have a copy with a visible signature?
 21 A. I do.
 22 Q. Is that your signature?
 23 A. It is, yes.
 24 Q. Are the contents of your statement true to the best of
 25 your knowledge and belief?

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1 "I do not recall being involved in any prosecutions
 2 which relied on Horizon IT data prior to Mrs McKelvey's
 3 case discussed below or indeed in any subsequent
 4 prosecutions. This is the only prosecution case
 5 involving these issues that I was involved in."
 6 Was Maureen McKelvey's case also the only case in
 7 which you have been involved where the individual being
 8 prosecuted was an agent or employee of the Post Office?
 9 A. That's correct, yes.
 10 Q. Was this the only case in which you were involved where
 11 the Post Office conducted the initial criminal
 12 investigation, as opposed to the Police Service Northern
 13 Ireland?
 14 A. Yes.
 15 Q. Were there other bodies like the Post Office who did
 16 initial investigations before referring cases to the
 17 Department of the Director of Public Prosecutions?
 18 A. Yes, there were.
 19 Q. Can you give an example of one of those other bodies?
 20 A. Social Security Agency.
 21 Q. Was the process for dealing with cases referred by the
 22 Post Office different at all from the process for
 23 dealing with cases referred by other bodies?
 24 A. Not to my knowledge. They came through the police.
 25 Q. At the point you became involved in Maureen McKelvey's

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1 A. Yes, they are.
 2 Q. For the purposes of the transcript, the reference for
 3 Mr Shiels' statement is WITN10580100.
 4 Starting, please, Mr Shiels, with your professional
 5 background. You completed your professional training
 6 and were called to the roll as solicitor by the Law
 7 Society of Northern Ireland in 1991; is that right?
 8 A. That's correct.
 9 Q. You were in private practice in criminal law until 2003?
 10 A. Yes, that's correct.
 11 Q. At that point, you joined the Department of the Director
 12 of Public Prosecutions as a Senior Public Prosecutor?
 13 A. I did, yes.
 14 Q. You continued as a Senior Public Prosecutor when the
 15 office was reconstituted as the Public Prosecution
 16 Service for Northern Ireland in 2005; is that right?
 17 A. That's right, that's correct.
 18 Q. Is it right that you remain a senior Public Prosecutor
 19 in the Western and Southern Region of the Public
 20 Prosecution Service for Northern Ireland?
 21 A. That's correct, yes.
 22 Q. You have addressed in your statement your involvement in
 23 the prosecution of Maureen McKelvey. Could we have on
 24 screen, please, paragraph 5 of Mr Shiels' statement,
 25 that is page 2. At paragraph 5, you say:

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1 case, that was February 2004, did you work in a team in
 2 the Department of the Director of Public Prosecutions?
 3 A. I worked in a region, which consisted, I think, of five
 4 Senior Public Prosecutors. It was called the Northern
 5 Region.
 6 Q. Were you aware at the time of others in that region
 7 working on cases referred after initial investigation by
 8 the Post Office?
 9 A. No.
 10 Q. As far as you were aware, was the Department of the
 11 Director of Public Prosecutions, later the Public
 12 Prosecution Service, ever given any presentations or
 13 briefings by the Post Office in respect of the
 14 investigations they carried out and the evidence they
 15 produced in support of prospective prosecutions?
 16 A. Not to my knowledge, no.
 17 Q. Were Post Office cases ever discussed within your team
 18 or region of prosecutors?
 19 A. Not to my knowledge, no.
 20 Q. As far as you are aware, was there one point of contact
 21 at the Post Office for information relating to Post
 22 Office cases?
 23 A. No, not to my knowledge.
 24 Q. To the extent that you can help, once a report was
 25 produced by the Post Office and sent on to the

4

1 Department for the Director of Public Prosecutions,
 2 later the Public Prosecution Service, was there any
 3 scrutiny of the adequacy of the investigation done by
 4 the Post Office?
 5 **A.** Not -- no, in the sense that, prior to reaching the
 6 Department of Public Prosecutions, it went through the
 7 police, so -- to ensure that everything that was
 8 requiring for a prosecution was present, so that would
 9 be scrutinised. And, likewise, once it arrived in the
 10 Department of Public Prosecutions, if there was evidence
 11 missing or a break in the evidence, we would ask for it.
 12 But, no, there was no scrutiny of the investigation of
 13 the Post Office, as such.
 14 **Q.** Turning then to your consideration of the file in the
 15 Maureen McKelvey case, could we have on screen, please,
 16 paragraph 9 of Mr Shiels' statement, it's page 3. At
 17 paragraph 9, you say this:
 18 "The file was allocated to me on 19 February 2004.
 19 My role was that of 'Directing Officer', which is the
 20 PPS (then DPP) lawyer, with responsibility for
 21 considering the file and applying the PPS Test for
 22 Prosecution. The Test for Prosecution is set out at
 23 Section 4 of the PPS Code for Prosecutors. It is met
 24 if:
 25 "(i) the evidence which can be presented in court is

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1 report on screen, please. It is PNI0000001_082. This
 2 is the letter from the Detective Superintendent
 3 P McAuley. The Detective Superintendent says this:
 4 "This file refers to a theft from the post office
 5 over a considerable period of time and although the
 6 defendant makes no admission regarding these thefts
 7 I feel that there is sufficient evidence to proceed with
 8 the prosecution for theft against the accused."
 9 What involvement did you understand PSNI to have had
 10 in this case before the submission of the file for
 11 a prosecution decision?
 12 **A.** The involvement would be the report, the file being
 13 submitted to the Criminal Justice Branch, who would have
 14 reviewed it, then probably run to the -- the DPP, as it
 15 then was. There was no -- they appointed -- my
 16 understanding is that they appointed a Detective
 17 Constable to oversee the files, to ensure that the
 18 evidence was present.
 19 **Q.** At the time, what was your understanding of the police's
 20 knowledge of Post Office cases in general?
 21 **A.** I don't know. I don't know that the police had any
 22 knowledge of Post Office cases.
 23 **Q.** Who had ownership of the investigation once a report had
 24 been sent by the Post Office to the police, the Post
 25 Office or the police?

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1 sufficient to provide a reasonable prospect of
 2 conviction -- the Evidential Test; and.
 3 "(ii) prosecution is required in the public
 4 interest -- the Public Interest Test."
 5 What process did you follow when you received a file
 6 in respect of which you were being asked to take
 7 a prosecution decision?
 8 **A.** As I do with all files: I assess the evidence and, if
 9 the evidence was sufficient, prosecute.
 10 **Q.** In terms of what the file you received in this case
 11 contained, you address this at paragraph 8 of your
 12 statement, if we could go back a page, please. Towards
 13 the bottom, please, you say:
 14 "A file in relation to this matter was received from
 15 Police Service of Northern Ireland on 28 January 2004.
 16 The file contained a covering letter from Detective
 17 Superintendent P McAuley stating that there was
 18 sufficient evidence for a prosecution. The file
 19 contained a further report prepared by Suzanne Winter,
 20 Investigations Manager with Post Office Limited
 21 detailing that 'the discrepancies summarised on the
 22 pension schedule indicate it is due to deliberate action
 23 and not error and McKelvey is the only person with the
 24 appropriate access and opportunity'.
 25 Could we have that covering letter and underlying

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1 **A.** I would say the Post Office.
 2 **Q.** How much weight would you have given the police
 3 assessment of sufficiency of evidence when you received
 4 the file with a covering letter in these terms?
 5 **A.** I rely on my own view of the -- of each and every file.
 6 The police recommendations and views are solely
 7 recommendations and views. That's all I can say,
 8 there's -- I wouldn't attach great weight to the police
 9 recommendations.
 10 **Q.** You have said that this was the first and only case you
 11 dealt with which relied upon Horizon data. Prior to
 12 being allocated this case, did you receive any training
 13 at all from the Post Office on the Horizon IT System?
 14 **A.** No.
 15 **Q.** When you were allocated the case, were you given any
 16 information about the Horizon IT System by colleagues
 17 who had been involved in Post Office cases?
 18 **A.** No.
 19 **Q.** Did you take any steps, upon being allocated this file,
 20 to understand how the data relied upon was generated
 21 before you took the decision to prosecute?
 22 **A.** No.
 23 **Q.** Why not?
 24 **A.** Well, I was relying on the information supplied in the
 25 statements of those people who were using the system,

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1 ie the Post Office employees.
 2 **Q.** Going over the page, please, we can see the summary
 3 sheet prepared by the PSNI and this lists the nature of
 4 the offence, and we see there "Theft", and scrolling
 5 down a little, please, the officer in the case, Suzanne
 6 Winter, Investigation Manager. Going over two more
 7 pages, please, we have Ms Winter's report.
 8 About halfway down the page, the subject is:
 9 "Theft of Post Office Limited monies at Clanabogan
 10 Post Office ... by Mrs Maureen McKelvey subpostmaster of
 11 Clanabogan Post Office."
 12 Two-thirds of the way down, we have the date that
 13 the report was submitted, which is December 2002. Then
 14 going to page 6 of this document, please. There is
 15 a précis of facts, which is authored by Ms Winter. The
 16 first page here sets out some background to the paying
 17 out of pensions and allowances by members of the public
 18 to the Post Office and, towards the bottom, the
 19 penultimate paragraph here on this page, there is
 20 an explanation of foils, in this way:
 21 "Customers who collect a pension or allowance
 22 normally receive payment by order book. The order book
 23 contains a number of detachable foils, on which is
 24 printed the: date of payment, amount of payment, pension
 25 or National Insurance number, group number. The
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1 pension and allowances is then entered in the Payments
 2 Table of the weekly Cash Account of the post office.
 3 "On completion of the weekly cash account all paid
 4 pension and allowances foils and form P2311(b)MA are
 5 dispatched to the Paid Order Unit Lisahally,
 6 Londonderry."
 7 Did you understand this summary to be saying that
 8 the amounts on the various physical foils were entered
 9 into the system, which resulted in an adlist being
 10 created which gave both a total of each group of foils
 11 and then a summary of the total for all groups?
 12 **A.** Yes.
 13 **Q.** The next step was then to enter all the group totals for
 14 the accounting week onto the form P2311(b)MA and the
 15 physical foils for the week were sent with that form to
 16 the Paid Order Unit. That's what the summary here is
 17 saying, isn't it?
 18 **A.** Yes.
 19 **Q.** The next paragraph then explains the checks that were
 20 conducted by the Paid Order Unit, which were conducted
 21 on a rota basis. About halfway down that paragraph, it
 22 says:
 23 "Whilst conducting a routine 'rota check' of the
 24 paid pension and allowances foils dispatched by
 25 Clanabogan Post Office, overclaims were identified, on
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1 detachable foils are attached to a counterfoil which is
 2 fastened to the covering of the order book.
 3 "Payment can only be made on or after the due day of
 4 the payment unless payment in advance has been
 5 authorised. When the order book is presented at the
 6 post office both the counterfoil and the detachable foil
 7 are date stamped, the detachable foil is torn from the
 8 order book and the customer paid the sum stated on the
 9 foil. The detached foil is retained in the post office
 10 for accounting purposes."
 11 Then follows an explanation of the way pensions and
 12 allowances are accounted for weekly. It says here:
 13 "Pensions and allowances paid at the counter are
 14 summarised and accounted for weekly. Many post offices
 15 prepare a daily summary of paid pension and allowance
 16 foils. Daily and/or weekly summaries are prepared by
 17 sorting all paid foils into their respective group, in
 18 ascending order of value, each group of foils is then
 19 machine adlisted with the total for each group, carried
 20 to the bottom of the machine listing to [produce]
 21 a summary of all group totals. Group totals, from all
 22 machine lists for that accounting week, are entered onto
 23 the form P2311(b)MA. Grand totals, for the individual
 24 group numbers, are summarised on the Pensions and
 25 Allowances Summary P2311MA. The grand total for all
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1 each of the weeks examined, varying in value, from 40p
 2 to £148. The overclaims were generated by claiming
 3 non-existent pension and allowances foils."
 4 Pausing there, when you read that last sentence "The
 5 overclaims were generated by claiming non-existent
 6 pension and allowance foils", did you stop to ask
 7 whether this was the correct conclusion to draw as to
 8 the discrepancies which had been identified by the Paid
 9 Order Unit?
 10 **A.** Sorry, repeat the question?
 11 **Q.** So the last line here draws a conclusion as to how the
 12 overclaims were generated, and it says, "The overclaims
 13 were generated by claiming non-existent pension and
 14 allowance foils".
 15 So what the Paid Order Unit had highlighted to the
 16 Post Office, according to this summary, was that there
 17 was a mismatch between the physical foils for the week
 18 and the figures on the P2311(b)MA, yes?
 19 **A.** Yes.
 20 **Q.** Did you understand from the summary given to you at the
 21 time that the figures appearing on the P2311(b)MA were
 22 generated, in part, by someone in branch putting in
 23 figures from the hard copy foils and, in part, by the
 24 computer, which generated an adlist; was that your
 25 understanding from this summary?
 12

1 A. Yes, that -- the information was inputted via the
2 computing system, which gave a balance at the end of the
3 week and which was to match -- that figure should have
4 matched the number of foils that had been paid -- or
5 stubs, counterfoils.

6 Q. So with that in mind, the conclusion that is stated
7 here, "The overclaims were generated by claiming
8 non-existent pension and allowance foils", I'm asking
9 whether you stopped to question whether that conclusion
10 was justified on the basis of the summary, because there
11 were two alternative explanations for the mismatch,
12 weren't there, apart from a purposeful overclaim: either
13 an error on the part of the person entering the figures
14 from the physical foils or an error on the part of the
15 computer system generating the adlist. Would you agree
16 with those two possible alternatives?

17 A. Well, yes, I would agree.

18 Q. Was this something you considered when you read the
19 conclusion in the terms put here, which had been reached
20 by the Post Office Investigator, that the claims --

21 A. No.

22 Q. -- were generated by claiming non-existent pension and
23 allowance foils?

24 A. No, I didn't reach that conclusion, simply for the fact
25 that the allegation was that Ms McKelvey was stealing

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1 out was a shortage of £152.80.

2 "At the conclusion of the audit, McKelvey was
3 formally interviewed under Police and Criminal Evidence
4 (Northern Ireland) Order 1989 Codes of Practice, tape
5 seal numbers [those are given] in the presence of her
6 solicitor Stephen Atherton.

7 "McKelvey could or would not offer a reason for the
8 discrepancies and stated she had done everything to the
9 best of her ability."

10 So the summary of Ms McKelvey's position in this
11 report was that she could not explain the discrepancies
12 she was being asked about and had made no admissions; is
13 that fair?

14 A. That's a fair assessment, yes.

15 Q. There are then, starting at the top of this page, some
16 observations made by the Investigator.

17 Forgive me, going on to the next stages of
18 investigation. We've reached at this point the first
19 interview, so starting at the top of this page:

20 "At the conclusion of the interview McKelvey was
21 informed further checks needed to be completed of the
22 pension and allowance to establish the final figure of
23 the overclaims. McKelvey and Atherton were invited to
24 observe the checking of the outstanding pensions as
25 allowance pouches.

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1 the money. So it wasn't errors, there were no errors
2 highlighted in terms of the computing system or personal
3 errors.

4 Q. Just at this point, did you consider these two
5 alternative explanations for a mismatch between the
6 figures on the physical foils and those on the form it
7 was being compared to?

8 A. No, I didn't.

9 Q. The report goes on to explain what investigations had
10 been done by Post Office Investigators, having been
11 alerted to discrepancies identified by the Paid Order
12 Unit:

13 "The Post Office Limited Investigation Team when
14 appraised of the situation, made arrangements to receive
15 the paid pension and allowance pouches, forwarded from
16 Clanabogan Post Office to POU, Lisahally, on behalf of
17 the Benefits Agency.

18 "Local checks by the Post Office Limited
19 Investigation Team revealed overclaims of a similar
20 pattern to those identified by the POU, Lisahally.

21 "Les Thorpe and Suzanne Winter, Consignia
22 Investigation Team attended Clanabogan Post Office, on
23 Thursday, 4 April 2002, accompanied by John McKenny,
24 a member of the Security and Audit Team. A special
25 audit was conducting by McKenny and the result of the

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1 "On 2 May 2002 McKelvey and Atherton observe the
2 examination of the pension pouches and additional
3 overclaims were identified.

4 "On completion of the examination of the pension
5 pouches arrangements were made with Atherton to formally
6 interview McKelvey regarding the additional pension and
7 allowance overclaims identified.

8 "On 27 May 2002 McKelvey was formally interviewed
9 under Police and Criminal Evidence (Northern Ireland)
10 Order 1989 Codes of Practice, tape seal numbers [and
11 that's given], in the presence of her solicitor, Stephen
12 Atherton.

13 "McKelvey offered no explanation regarding the
14 additional overclaims identified.

15 "McKelvey has made no admissions of guilt in this
16 matter and states she has done everything to the best of
17 her ability."

18 We then come on to some observations made by the
19 Investigator which are as follows:

20 "The discrepancies summarised on the pension
21 schedule indicate it is due to deliberate action and not
22 error and McKelvey is the only person with the
23 appropriate access and opportunity.

24 "Maureen McKelvey has rendered herself liable to
25 prosecution and in view of the availability of evidence

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1 to support such actions these papers are forwarded for
2 authorisation to prosecute.

3 "The accounting aspect in this case is currently
4 £4,623.48 and remains outstanding."

5 There is no reason given here by the Investigator
6 for why she says the discrepancies summarised on the
7 pension schedule indicate it is due to deliberate action
8 and not error. There is also no reason given for why
9 Ms Winter considered that Mrs McKelvey had rendered
10 herself liable to prosecution. Did you probe why these
11 conclusions were reach by Ms Winter at this time?

12 **A.** No, I did not.

13 **Q.** You say at paragraph 10 of your statement that, having
14 considered the evidence on the file, you decided that
15 the test for prosecution was met. There's no reference
16 in Ms Winter's report to what material was included with
17 the report. Can you recall now whether you were
18 provided with the records of tape recorded interview
19 with the report from Ms Winter or were you reliant on
20 the summary given in the report at the point of taking
21 the decision to prosecute.

22 **A.** No, I had a full transcript of the three taped
23 interviews conducted with Mrs McKelvey.

24 **Q.** Did you read through them before you took your decision?

25 **A.** I did.

17

1 your decision to prosecute?

2 **A.** No.

3 **Q.** Did you --

4 **A.** Mrs McKelvey -- reading that, Mrs McKelvey said it was
5 an error on her part.

6 **Q.** So you understood that to mean she was saying it was
7 error on her part --

8 **A.** Yes.

9 **Q.** -- rather than deliberate overclaiming?

10 **A.** Yes.

11 **Q.** Having read the interview transcript and having
12 interpreted that in that way, did you consider any
13 further the possible explanation, other than theft, that
14 there might be errors, human errors or computer errors,
15 that may have caused the discrepancies at the heart of
16 the case?

17 **A.** I considered human error not computer error.

18 **Q.** Why did you dismiss human error?

19 **A.** Because there is that -- there were that many, they were
20 so pronounced.

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

22 There is no reference in Ms Winter's report to the
23 fact that there were underclaims as well as overclaims,
24 to use the terminology of the report. Overclaims. Were
25 you aware that there were underclaims as well as

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1 **Q.** There was a point towards the end of Mrs McKelvey's
2 first interview in April where she raised a question
3 over whether there might have been an error on the
4 computer. That isn't mentioned in the précis of facts
5 in Ms Winter's report but, having read through the
6 transcripts, were you aware of that when you took the
7 decision to prosecute?

8 **A.** Yes.

9 **Q.** We can go to it if it would help. It's PNI0000001_062
10 and it's page 76, please. So going down, please,
11 towards the bottom of the page of this interview, this
12 is, as I said, towards the end of that first interview.
13 There's some discussion there of the physical foils on
14 that page. Towards the bottom, the last question on
15 this page, Suzanne Winter says:

16 "Have you anything else you'd like to say
17 Mrs McKelvey before we conclude the interview?"

18 At the top of the next page, please:

19 "Yes I do believe I did everything to the best of my
20 ability, I've been doing it for 11 years and I done it
21 right, if there's been an error on the computer?? I've
22 just done that, I didn't mean to do it, that's all I can
23 say."

24 So that gives the context for the reference to error
25 on the computer. Did this have any influence at all on

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1 overclaims identified at the point of deciding that the
2 prosecution test was met?

3 **A.** From memory, yes.

4 **Q.** What relevance did you think that that had?

5 **A.** The overclaims -- in terms of the overclaims, because of
6 the amount of money claimed, when it balanced it should
7 reflect how much of the overclaim was. So, for
8 instance, if there was an overclaim of £150, one would
9 expect to find the balance on the Post Office of £150
10 over. But there was -- the overclaims never matched the
11 balance on the books. So that was -- indicate that
12 money was being removed or hidden. The same way with
13 the underclaims.

14 **Q.** Did you consider that the existence of underclaims might
15 reflect errors, whether they are human or computer,
16 causing a discrepancy the other way?

17 **A.** On reflection now, yes. But at the time, no.

18 **Q.** At the time, how did you satisfy yourself that
19 Ms Winter's assessment that the discrepancies on the
20 pension schedule indicated deliberate action were
21 correct?

22 **A.** Well, it wasn't only Mrs Winter, it was the staff at
23 Lisahally who were doing the checks, and their evidence
24 supported the account of Ms Winter.

25 **Q.** In terms of the figure given for the accountancy aspect

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1 of the case, could we have Ms Winter's report back on
2 screen, please. That is PNI0000001_082. It's page 8
3 of that document, please. Towards the bottom of the
4 précis of facts. This page, the last sentence:

5 "The accounting aspect of this case is currently
6 £4,623.48 and remains outstanding."

7 This was the figure the Post Office was alleging
8 that Ms Winter had stolen and we can see that if we go
9 to page 11 of the document. Under "Recommendations as
10 to Charges and Proceedings":

11 "... that you Maureen McKelvey between a date
12 unknown and 4 April 2002 at Clanabogan Post Office stole
13 £4,623.48 the property of Post Office Limited.

14 "Contrary to ... the Theft Act ..."

15 The précis of facts from Ms Winter explained that
16 there had been an audit conducted on 4 April 2002 and
17 the result of that, we saw in the summary, was
18 a shortage of £152.80. It seems, then, that there was
19 analysis of further pensions and allowances pouches,
20 although there's no mention in the summary of any
21 further audit conducted. How did you satisfy yourself
22 that there was an actual loss to the Post Office and the
23 extent of that loss, having read Ms Winter's report.

24 **A.** It wasn't Ms Winter's report; it was the totality of the
25 file, it was the evidence given by the -- excuse me --

21

1 **Q.** Does the law, as it applies in Northern Ireland, include
2 the same requirement as the law in England and Wales,
3 that the prosecution must pursue all reasonable lines of
4 inquiry, whether pointing towards or away from the guilt
5 of a suspect?

6 **A.** Yes.

7 **Q.** As a prosecutor, and you made some reference to this
8 earlier, if you consider that a reasonable line of
9 inquiry has not been pursued in a case or that there is
10 an evidential gap in the case, could you direct
11 an Investigating Officer to pursue that line or
12 investigate that gap?

13 **A.** I would ask them to consider pursuing it or find
14 an explanation as to the gap or why there's a gap.
15 I could direct them but, whether they conducted the --
16 acted on my directions, it's a matter for them.

17 **Q.** When you read Ms Winter's report, did you consider there
18 were any reasonable lines of inquiry which had not been
19 pursued or any evidential gaps in the case?

20 **A.** No, from memory, no.

21 **Q.** I asked earlier about alternative explanations in this
22 case, other than deliberate overclaiming, namely human
23 error and computer error. Having read Ms Winter's
24 summary of steps taken in the investigation, to the
25 point of this report, did you ask yourself whether

23

1 the officers who were checking the foils in Lisahally.

2 They totalled the losses, or what they are saying was
3 the losses.

4 **Q.** What relevance, if any, did you think the audit on
5 4 April 2002 -- so that's the audit conducted on the day
6 of the first interview -- the figure at that audit for
7 a shortage being £152.80?

8 **A.** I don't recall putting any store by the figure or the
9 fact that there was a shortfall at that point in time.

10 **Q.** Well, the shortfall at that point is obviously
11 significantly lower than the overall figure, which was
12 being cited in relation to the proposed theft charge, so
13 what I'm trying to understand is how you understood the
14 Post Office to have reached the loss figure?

15 **A.** By totalling all the shortfalls or the -- sorry, by
16 totalling all the overclaims, payments, being the
17 specific dates on the charge.

18 **Q.** So it was the audit shortage and then updated to include
19 the differences between the physical foils and the form
20 on which those figures ended up being recorded?

21 **A.** Correct, yes.

22 **Q.** Okay. At the time, did you think that was sufficient
23 evidence of the loss in this case to meet the
24 prosecution test?

25 **A.** Yes.

22

1 either of those possibilities should be investigated
2 further?

3 **A.** No.

4 **Q.** More widely, did you have any reason, when you
5 considered this report, to question whether the data
6 being relied upon by the Post Office was reliable?

7 **A.** I had no reason to believe otherwise.

8 **Q.** On what basis did you decide that the evidential test
9 was met in this case for a charge of theft and, in
10 particular, the dishonesty aspect to that offence?

11 **A.** Well, there was no attempt by Mrs McKelvey to repay the
12 alleged money stolen and she -- because of the amount of
13 alleged human errors, there were too many to discount as
14 solely errors and not a deliberate act -- or deliberate
15 acts of theft.

16 **Q.** You say at paragraph 10 of your statement that, having
17 decided the prosecution test was met, you issued
18 a direction to case preparation in late February 2004,
19 to prepare papers in anticipation of trial; is that
20 right?

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

22 **Q.** You then signed committal papers on the 22 March 2004;
23 is that right?

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

25 **Q.** Could we have on screen, please, PNI0000001_082. Going

24

1 to page 4 of the document, please -- apologies, I've
2 given the wrong reference. Could we please have
3 PNI00000001_081. That's page 4. So we can see that
4 this is to the Chief Constable and, scrolling down to
5 the bottom, please, we can see that it is dated 22 March
6 2004 and it's a communication from you.

7 Going back up, please, under "Charge", there is
8 this:

9 "Prosecute Maureen McKelvey on indictment for the
10 following non-scheduled offence:

11 "That you, on a date unknown between the 1st day of
12 September 2001 and the 21st day of August 2002, in the
13 County Court Division of Fermanagh and Tyrone, stole
14 cash in the sum of £4,623.48 or thereabouts belonging to
15 Post Office Limited, contrary to Section 1 of the Theft
16 Act (Northern Ireland) 1969."

17 Did you draft the charge that we see here?

18 **A.** I did, yes.

19 **Q.** Then under "General", there is this:

20 "Prosecution on indictment is warranted.

21 "The amount of 'errors' in a relatively short time
22 frame would indicate that this is more than simple
23 incompetence."

24 This appears to be the extent of the reasoning
25 provided to the Chief Constable for why the prosecution

25

1 **Q.** Given your lack of knowledge of the Post Office
2 accounting practices and computing software when you
3 were allocated this case, do you think you were in the
4 position to make an assessment of what any given number
5 of errors might be indicative of?

6 **A.** Well, say -- I was relying on people who were providing
7 the information from Lisahally but, given that
8 Mrs McKelvey had been doing this for a certain length of
9 time, with no errors, it was surprising. The errors
10 arising were too many to ignore.

11 **Q.** Were you, in fact, led by the Post Office assessment of
12 the case, as set out in the investigation report of
13 Ms Winter?

14 **A.** I wouldn't say I was led, no, I had cognisance of the
15 report but I wasn't relying on the report because the
16 report isn't evidence -- evidential. The evidence was
17 contained in the statements of the witnesses from
18 Lisahally.

19 **SIR WYN WILLIAMS:** Well, I was going to ask you expressly,
20 I take it that the file which you received from the
21 police, upon which you based your decision, actually
22 contained the witness statements which, some weeks
23 later, formed the basis of the committal bundle; is that
24 right?

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

27

1 test was met; is that right?

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

3 **Q.** Can you help with why you considered that a large number
4 of errors in a relatively short time frame was
5 indicative of theft, rather than "simple incompetence",
6 as you put it?

7 **A.** From memory, no. The only thing I would say is that,
8 because of the amount of errors, Mrs McKelvey was
9 alleging in interview that when she was inputting the
10 data into the computer, the computer itself was --
11 wasn't user-friendly but there were that many, as I say,
12 errors that it just couldn't be simply incompetence on
13 behalf of the -- Mrs McKelvey. There must have been
14 something more to it.

15 **Q.** In this case there were discrepancies identified which
16 post-dated the audit and the first interview conducted
17 on 4 April 2002 and these were put to Mrs McKelvey in
18 the second interview which took place on 27 May 2002.

19 Did you take this into account when making your
20 prosecution decision, in that these discrepancies arose
21 after Mrs McKelvey had come under scrutiny, so would
22 that not be something which weighed against deliberate
23 overclaiming rather than for?

24 **A.** I can't recall. I understand the questioning yes, but
25 now, sitting here today, no, I can't recall that.

26

1 **SIR WYN WILLIAMS:** Right. Without identifying them, are you
2 telling me, because you mentioned it on a number of
3 occasions, that there were, in that file, witness
4 statements from members of staff at Lisahally, which you
5 relied upon?

6 **A.** Yes, that's correct, yes.

7 **SIR WYN WILLIAMS:** All right. Thank you. Yeah.

8 **MS PRICE:** Having been through Ms Winter's report in some
9 detail this morning, would you agree that the report did
10 not sufficiently address the possibilities of human or
11 computer error as alternative explanations in the case?

12 **A.** Yes, I would agree with that.

13 **Q.** Going back to your direction to the Chief Constable --
14 and this is page 4, we're on page 4 -- below your
15 reasoning for why the prosecution test was met, you set
16 out the steps to be followed to progress the case. You
17 say:

18 "Primary prosecution disclosure will be made to the
19 dense following committal.

20 "Committal papers, directions for committal
21 proceedings, the police investigation file and a Copy
22 Direction Part I have been handed to the police officer
23 in charge of the case and he should deal with them in
24 compliance with PSNI Force instructions.

25 "The Senior Law Clerk, Southern Circuit, will be

28

1 sent, *inter alia*, copy Part I of this direction,
 2 Direction Part II, copy Directions for committal
 3 proceedings and letters and enclosures to be given to
 4 the Disclosure Officer at the time the committal papers
 5 are checked and copy police report.

6 "The District Commander, Omagh, Police Service of
 7 Northern Ireland, has now been sent a copy Direction
 8 Part I and copy Directions for committal proceedings."

9 So you gave directions to others to progress the
 10 case in these ways, including direction to provide the
 11 Disclosure Officer with directions for committal
 12 proceedings, letters and enclosures. Could we have on
 13 screen, please, paragraph 13 of Mr Shiels' statement,
 14 that's page 4 of the statement. Do you say here:

15 "The primary disclosure would have included the
 16 Non-Sensitive Disclosure Schedule which to my
 17 recollection was provided by police. I would also have
 18 been in receipt of the Sensitive Schedule which was
 19 a nil return. My understanding at the time was
 20 Detective Constable Coyle was the Disclosure Officer."

21 So your understanding is that the non-sensitive
 22 disclosure schedule was provided by the police; is that
 23 right?

24 A. Yes.

25 Q. You say your understanding at the time was that

29

1 Winter.

2 Q. Did you have any concerns at all about the Disclosure
 3 Officer in the case being an Investigator for the Post
 4 Office?

5 A. No.

6 Q. Were you satisfied that Ms Winter was suitably qualified
 7 for the role?

8 A. I never thought about it. (*Unclear*) but, considering
 9 she was the Investigator for the Post Office, I thought
 10 she was sufficiently qualified to investigate.

11 Q. Under point 1 of the disclosure instructions, you say:

12 "At the time when you return the signed committal
 13 papers to the Senior Law Clerk for checking you will be
 14 handed an envelope containing primary prosecution
 15 disclosure. On the day of committal, following the
 16 committal for trial, you should hand the envelope to the
 17 legal representative for the accused, or, if that is not
 18 possible to the accused personally."

19 Would you have considered the primary disclosure
 20 material yourself at the stage you were sending out your
 21 directions in the case or would you simply have checked
 22 over the disclosure schedules provided to you?

23 A. No, I would have provided primary disclosure at
 24 committal, if anything fell to be disclosed.

25 SIR WYN WILLIAMS: Sorry, I didn't quite catch that. Could

31

1 Detective Constable Coyle was the Disclosure Officer in
 2 the case?

3 A. Yes.

4 Q. Could we look please to the directions for committal
 5 proceedings, this is PNI00000001_081, and page 5,
 6 please. So this is "Directions for Committal
 7 Proceedings", a copy of which you had asked to go to the
 8 Disclosure Officer in the case. This is sent to officer
 9 in charge, Suzanne Winter, who is then identified there.

10 Going over the page, please, we can see there are
 11 instructions relating to disclosure. Is it right,
 12 therefore, that Suzanne Winter was the Disclosure
 13 Officer in the case or is it still your understanding
 14 that it was the police officer, Detective Constable
 15 Coyle who was the Disclosure Officer?

16 A. I would say that Suzanne Winter in real terms was the
 17 Disclosure Officer because she had -- as a Post Office
 18 employee, she had access to the documents within the
 19 Post Office. But I think Detective Constable Coyle may
 20 not have been -- in real terms, the Disclosure Officer
 21 was Suzanne Winter, I'd say, on reflection.

22 Q. The disclosure schedules which were provided to you, did
 23 you understand those to have been prepared by Suzanne
 24 Winter or by the police?

25 A. On reflection, I think they were prepared by Suzanne

30

1 you repeat that answer?

2 A. I would have considered primary disclosure at the time
 3 of committal and disclosed material at that point.

4 MS PRICE: Could we have on screen, please, paragraph 14 of
 5 Mr Shiels' statement, it is page 4. At paragraph 14 you
 6 say this:

7 "There was nothing in the Non-Sensitive Disclosure
 8 Schedule or the Sensitive Disclosure Schedule which
 9 alerted me to any issue with the Horizon IT System. If
 10 any such material existed and was brought to my
 11 attention I would have disclosed it as primary
 12 disclosure. I would also have reviewed whether the test
 13 for prosecution remained met."

14 Are you saying here, essentially, that you were
 15 reliant upon the Post Office to draw your attention to
 16 any material which might have put in question the
 17 reliability of the Horizon data?

18 A. Yes, I am.

19 Q. In terms of the issues being raised in the defence
 20 statement in this case -- and we'll come on to look at
 21 that in a moment -- given that human error was being
 22 raised, did you make any enquiries of the Post Office
 23 through the police as to the level of training
 24 Mrs McKelvey had received on the Horizon system or any
 25 difficulties she had reported with using the system?

32

1 **A.** No, I did not.
 2 **Q.** Do you think that you should have done?
 3 **A.** No.
 4 **Q.** Mrs McKelvey pleaded not guilty on 17 May 2004 and the
 5 case was listed for mention on 24 June 2004; is that
 6 right?
 7 **A.** Yes.
 8 **Q.** You deal at paragraph 17 of your statement with the
 9 Directing Officer's role in relation to disclosure and
 10 you say:
 11 "An important part of the Directing Officer's role
 12 is to discharge the disclosure duties placed on the
 13 DPP/PPS. Those obligations are set out at paragraphs
 14 4.54-4.59 of the PPS Code for Prosecutors. By virtue of
 15 Section 7A of the Criminal Procedure and Investigations
 16 Act 1996 (as amended) disclosure duties are continuing
 17 and are kept under review by the Directing Officer
 18 throughout a prosecution."
 19 Secondary disclosure was triggered by receipt of the
 20 defence statement in this case; is that right?
 21 **SIR WYN WILLIAMS:** Before we go on to that, Ms Price, I know
 22 that we've got them, can I just be told publicly, so to
 23 speak whether the primary disclosure Non-Sensitive
 24 Schedule was signed by anyone?
 25 **MS PRICE:** Sir, I'll find an answer to that and come back to
 33

1 **A.** Unsigned. I think that the Counsel for the Inquiry
 2 refers to a signature at page 14 of the Non-Sensitive
 3 Material which is redacted. I think that signature is
 4 mine.
 5 **SIR WYN WILLIAMS:** Right. But you are not the person, in
 6 effect, authenticating the disclosure statement; is that
 7 what you're telling me?
 8 **A.** Yes, that's right, yes.
 9 **SIR WYN WILLIAMS:** All right.
 10 **MS PRICE:** Sir --
 11 **SIR WYN WILLIAMS:** So where the Disclosure Officer, if I can
 12 use that phrase, should have signed the statement, it is
 13 not signed; is that correct?
 14 **A.** That's correct.
 15 **SIR WYN WILLIAMS:** Fine. Well, it's not fine. But you know
 16 what I mean.
 17 **MS PRICE:** Sir, the signature to which I'm referring is on
 18 a covering document to the schedule itself.
 19 **SIR WYN WILLIAMS:** Yes.
 20 **MS PRICE:** We will do some further investigation, sir, to
 21 see if we can provide you with more information.
 22 **SIR WYN WILLIAMS:** Yes. Thank you. Sorry to interrupt.
 23 **MS PRICE:** Not at all, sir.
 24 **SIR WYN WILLIAMS:** You were, I think, about to go on to
 25 secondary disclosure following a Defence Case Statement.
 35

1 you, if I may.
 2 **SIR WYN WILLIAMS:** I mean, Mr Shiels refers at paragraph 13
 3 to the Non-Sensitive Disclosure Schedule and gives
 4 a reference to a document. I just wonder, if we looked
 5 at that document, it would give us the answer, that's
 6 all.
 7 **MS PRICE:** Yes, I have the Schedule of Non-Sensitive
 8 Material. Unfortunately, the copy I have has a redacted
 9 signature and I recall now, sir, looking at this
 10 earlier, I'm sure we can look behind that redacted
 11 signature to see if we can find the answer, sir.
 12 **SIR WYN WILLIAMS:** I mean, I shouldn't hide the point,
 13 whoever was actually providing information for the --
 14 this is a question to you, Mr Shiels -- whoever was
 15 providing the information upon which the list was drawn
 16 up, the person who signs it has a legal obligation in
 17 relation to it, does he or she not?
 18 **A.** That's correct.
 19 **SIR WYN WILLIAMS:** Yes, yes, so I would like to know who did
 20 sign this. Thanks.
 21 **A.** I may be of assistance in that, from memory. In
 22 preparing my statement and having looked at the
 23 disclosure schedule, both the Sensitive and
 24 Non-Sensitive Disclosure Schedules were unsigned.
 25 **SIR WYN WILLIAMS:** They were unsigned?
 34

1 **MS PRICE:** I'm grateful.
 2 You address secondary disclosure at paragraphs 18
 3 and 19 of your statement, so going over the page,
 4 please. Here, you say this:
 5 "A Defence Statement was received by PPSSNI on
 6 10 May 2004. At paragraph 4 it cited four possible
 7 causes of the branch shortfalls identified:
 8 "(i) Human error;
 9 "(ii) Pressure of running the shop;
 10 "(iii) Operating a credit account through the Post
 11 Office;
 12 "(iv) Failure of the Post Office to provide
 13 a sufficient cash float."
 14 Then at 19:
 15 "Regardless of the contents of the Defence
 16 Statement, had any matter been drawn to my attention
 17 suggesting that there was a question mark over the
 18 reliability of the Horizon IT System this would have
 19 been disclosed as primary disclosure as it would clearly
 20 have undermined the prosecution case."
 21 So the reliability of the Horizon IT System was not
 22 raised explicitly in the Defence Statement but, again,
 23 you say that had you been made aware that there was any
 24 question of the reliability of the IT system, you would
 25 have considered this to be disclosable information; is
 36

1 that right?

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

3 **Q.** Following receipt of the Defence Statement, you sent
4 this to Detective Constable Coyle asking him to review
5 the unused material listed on the schedules and in his
6 possession; is that right?

7 **A.** Yes, it was sent on my behalf.

8 **Q.** Could we have on screen, please, PNI00000001_078.

9 This is a letter from you to Maureen McKelvey's
10 solicitors at the time dated 13 June 2004. You
11 enclosed -- scrolling down, please -- you refer to
12 having considered your Defence Statement received on
13 10 May. You refer to being required to disclose any
14 prosecution material which has not previously been
15 disclosed, which might reasonably be expected to assist
16 the defence, and then you enclose further documentation
17 in response to the Defence Statement.

18 Included in that list that you set out there, are
19 the last two items, 6 and 7: office copies of the
20 Clanabogan Post Office computer transaction log, for two
21 time periods. Having seen those actual documents which
22 appear further on in this larger document we're looking
23 at now, those are the documents titled "Cash account
24 final", aren't they?

25 **A.** Yes.

37

1 **A.** Yes.

2 **Q.** We will come on to the review you did of the prosecution
3 after Mrs McKelvey's ill health was raised in September
4 2004 but I would like first, please, to take you to some
5 of the documents relating to the July 2004 specific
6 disclosure requests, recognising, of course, that you
7 did not personally deal with these.

8 Could we have on screen, please, PNI00000001_071,
9 and page 3 of this document, please. This is a letter
10 dated 22 July 2004 from Mrs McKelvey's solicitors to
11 Detective Constable Coyle. It is the letter to which
12 you refer at paragraph 25 of your statement, if that
13 helps you to put it in context.

14 Scrolling down, please, we can see:

15 "We refer to the above matter and, following
16 directions of Forensic Accountants retained, hereby seek
17 the following Secondary Disclosure as a matter of
18 urgency ..."

19 There were four secondary disclosure requests made
20 in this letter. The first one was disclosure of all
21 correspondence between the Post Office Paid Order Unit
22 and the investigations unit, headed by Suzanne Winter,
23 as indicated in the statement of Ms Winter as giving
24 rise to her investigation.

25 The second was disclosure of all records held by

39

1 **Q.** Were you made aware by the Post Office at this stage or
2 any other stage that there was further and better audit
3 data available from Fujitsu on request?

4 **A.** No.

5 **Q.** Could we have on screen, please, page 6 of Mr Shiels'
6 statement to the Inquiry. That's page 6, paragraphs 23
7 and 24. At paragraphs 23 and 24, you say this:

8 "Having completed secondary disclosure I had no
9 further involvement in this case until I was requested
10 to review the prosecution on public interest grounds due
11 to the ill health of Mrs McKelvey on 10 September 2004.

12 "In this particular region the DPP office was
13 situated in Omagh Courthouse and was staffed at that
14 time by two Senior Public Prosecutors who would have
15 dealt with disclosure and other issues that would have
16 arisen during the lifetime of any case in the Crown
17 Court."

18 So is it right that you had no involvement in the
19 specific disclosure requests made by the defence in July
20 2004, although you have helpfully set out a summary of
21 events relating to these in the paragraphs which follow
22 in your statement.

23 **A.** That's correct.

24 **Q.** So is that summary based solely on your review of the
25 documents provided by you to the Inquiry?

38

1 Post Office Limited Investigations Unit, Social Security
2 Agency Paid Order Unit and Post Office Omagh
3 Headquarters of a report in the second half of 2001 by
4 Mrs McKelvey to Garry Groogan, Area Manager for Sub Post
5 Offices Omagh District, in relation to problems with the
6 Horizon computer:

7 "This request for assistance gave rise to a site
8 visit by Eugene McMahon and subsequent investigation by
9 Lisahally. We, therefore, seek immediate disclosure of
10 all documentation report to the conclusions drawn by
11 Lisahally."

12 Then third:

13 "Disclosure of all records relating to the reporting
14 of problems encountered at Clanabogan Post Office
15 following the suspension of Mrs McKelvey in relation to
16 Horizon computer system."

17 Finally, fourth:

18 "Please let us have copy of the Interview Tape[s].
19 PACE24 enclose herewith."

20 That last request is crossed out and someone has
21 written "Deal with previously", presumably because
22 these had already been disclosed; we've seen them on the
23 schedule, haven't we, Mr Shiels?

24 **A.** Yes.

25 **Q.** Then there is a letter from your late colleague, Brian

40

1 Curran, to Mrs McKelvey, dated 27 July 2004. Could we
2 have that on screen, please. The reference is
3 PNI00000001_079. That's the letter dated 27 July 2004.
4 It confirms that Mr Curran had asked the officer in
5 charge to liaise with Suzanne Winter in that third
6 paragraph there:

7 "... in order to deal with the request for further
8 disclosure."

9 Then we have a letter from Suzanne Winter to
10 Detective Constable Coyle, dated 30 July 2004. Could we
11 have that on screen, please. It is PNI00000001_069. We
12 see there from Suzanne Winter to Colin Coyle, 30 July
13 2004, and Ms Winter says this:

14 "Colin ... unable to contact you this morning and
15 I am on leave for 3 weeks. Update is as follows:

16 "Disclosure Statement.

17 "Ref 2 [so referring to the second disclosure
18 request]: I have spoken with Garry Groogan and Eugene
19 McMahon ... Garry has no reports available and Eugene
20 has a diary entry of visiting McKelvey February 2002 to
21 discuss Lottery I have search through the office file
22 and copied anything I believe may be relevant (see
23 enclosed).

24 "Ref 3: I have requested the call logs from August
25 2002 to present date. Temp postmaster started

41

1 1; is that right?

2 **A.** That's my understanding yes.

3 **Q.** Then 2 and 3, so referring to disclosure requests 2 and
4 3:

5 "Please see the attached report dated 30 July 2004
6 from the Investigating Officer.

7 "I would like to draw attention to no 3 where the
8 Investigating Officer states the logs are for
9 information only and cannot be used formally unless the
10 owners of the computer system are involved.

11 "I have retained a copy of the disclosure."

12 "Submitted for information and onward transmission
13 to the PPS."

14 So it appears that Suzanne Winter's letter of
15 30 July 2004 and Detective Constable Coyle's memo were
16 being sent on to the DPP; is that right?

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

18 **Q.** Going back a page, we can see this happening by way of
19 a letter dated 16 August 2004. Going to PPS, Belfast
20 Chambers from --

21 **A.** Yes --

22 **Q.** Forgive me, I cut across you?

23 **A.** Yes, that's correct, it was sent by C2.

24 **Q.** Is that where you were based or is that a different
25 location?

43

1 19 September 2002 and new postmaster started on 7 March
2 2003. These logs are for information only and cannot be
3 used formally if a statement and full explanation is
4 required the Fujitsu the owners of the Horizon computer
5 system have to be involved."

6 She then says she returns to work on 23 August.

7 You say in your statement that you had not seen this
8 letter before compiling your statement for the Inquiry;
9 is that right?

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

11 **Q.** Could we have back on screen, please, PNI00000001_071.
12 Going, please, to page 2 of this document, this is
13 a memo from Detective Constable Coyle to the Criminal
14 Justice Unit, Omagh, and it reads as follows:

15 "Please see the attached letter from John J McNally
16 & Co solicitors re Maureen McKelvey. Although the
17 letter is addressed to myself I have supplied the PPS
18 with the original.

19 "I have discussed the matter with the PPS and the
20 Investigating Officer Suzanne Winter and report as
21 follows:

22 1. I have been informed by the Investigating
23 Officer this matter is covered by the statements and
24 exhibits from staff at the Lisahally office."

25 So that appears to be relating to disclosure request

42

1 **A.** That was a different location.

2 **Q.** So this is from Criminal Justice Manager J McCleery.
3 Attention was drawn here to the "further documentation
4 for your information". That appears to enclose the memo
5 and Ms Winter's note that we've looked at, at the
6 previous page.

7 So attention was drawn by Detective Constable Coyle
8 to Ms Winter's comment that the helpline call logs were
9 for information only and could not be formally produced
10 unless the owners of the computer system were involved.

11 Did anyone from the DPP review the further
12 disclosure provided by Ms Winter to assess whether the
13 prosecution test was still met? I know you're working
14 on the basis of the documents you've seen but is there
15 any evidence of that on the documents you have seen?

16 **A.** No, there's nothing.

17 **Q.** Were you aware of the helpline call logs and other
18 documents contained in this new disclosure which showed
19 problems encountered by Mrs McKelvey using the system,
20 as well as some reports of discrepancies in the
21 accounts? Was that drawn to your attention at all by
22 anyone at the time?

23 **A.** No, it wasn't.

24 **Q.** Documents which showed problems encountered by
25 Mrs McKelvey using the system, as well as reported

44

1 discrepancies, were relevant, were they not, to your
 2 earlier assessment that the amount of errors in
 3 a relatively short time frame indicated more than simple
 4 incompetence, as you put it?
 5 **A.** Yes, they were very relevant.
 6 **Q.** They were also relevant to the third possible
 7 explanation for discrepancies, which I raised with you
 8 earlier -- computer error -- weren't they?
 9 **A.** Yes, they were.
 10 **Q.** Do you think these documents should have been drawn to
 11 your attention specifically at the time?
 12 **A.** Yes.
 13 **Q.** Had they been, would it have caused you to reassess
 14 whether the prosecution test was still met?
 15 **A.** It would have, yes.
 16 **Q.** Would it have changed your view as to whether the
 17 prosecution test was met?
 18 **A.** It may well have done.
 19 **Q.** The call logs which were produced by the Post Office
 20 were for the date range 26 September 2001 to 15 May
 21 2002. It appears that these were provided to
 22 Mrs McKelvey's solicitors. Could we have on screen,
 23 please, PNI00000001_070. Scrolling down, please, to the
 24 bottom, we can see this is the letter from Paul Dale
 25 from the DPP to Mrs McKelvey's solicitors, which you
 45

1 purposes of preparing your statement, are you able to
 2 assist at all with whether any further material was
 3 received or reviewed?
 4 **A.** From the material, no, there's no further material
 5 received.
 6 **Q.** Ms Winter had referred in her letter of 30 July 2004 to
 7 the need for a statement from Fujitsu if the call logs
 8 were to be used formally. The Inquiry has been unable
 9 to find any evidence on the papers disclosed of any such
 10 statement being obtained in this case. As far as you're
 11 aware, was a statement obtained from Fujitsu in this
 12 case?
 13 **A.** No, as far as I'm aware, there's no statement obtained.
 14 **MS PRICE:** I wonder if that might be a convenient moment for
 15 the morning break.
 16 **SIR WYN WILLIAMS:** Yes, certainly. Yes.
 17 **MS PRICE:** It is 11.25. Perhaps if we can come back at
 18 11.40, please, sir.
 19 **SIR WYN WILLIAMS:** Yes, certainly.
 20 **MS PRICE:** Thank you.
 21 (11.26 am)
 22 (A short break)
 23 (11.41 am)
 24 **MS PRICE:** Hello, sir, can you see and hear us still?
 25 **SIR WYN WILLIAMS:** Yes, thank you, yes.
 47

1 refer to in your statement. He says this:
 2 "I refer to your letter dated 22 July 2004.
 3 "I will deal the matters you raise in the same order
 4 as set out in your above correspondence:
 5 1. I am informed that this is covered by the
 6 statements and exhibits from staff at Lisahally office.
 7 2. The enclosed is the only relevant documents held
 8 by Post Office Investigations.
 9 3. Call logs from August 2002 to present date are
 10 not in possession of Post Office Investigations. I am
 11 informed that they have been requested and any documents
 12 received will be reviewed for disclosure in due course.
 13 I have, however, been supplied with a printout for
 14 26/09/01 to 15/05/02 which is enclosed for your
 15 information."
 16 What had been requested at item 3 of Mrs McKelvey's
 17 solicitors' letter were records of problems encountered
 18 at Clanabogan Post Office following Mrs McKelvey's
 19 suspension. The call logs referenced here related to
 20 the period before her suspension. Mr Dale's letter
 21 suggested that these had been requested. You say in
 22 your statement that you have no independent recollection
 23 of whether any further material was received or
 24 reviewed.
 25 Having reviewed the documentation you have, for the
 46

1 **MS PRICE:** Thank you. Sir, before I resume my questions
 2 relating to specific disclosure requests in July 2004,
 3 you asked earlier about the schedules of sensitive and
 4 non-sensitive material --
 5 **SIR WYN WILLIAMS:** Yes.
 6 **MS PRICE:** -- and whether they provided any assistance as to
 7 who had signed them off, if anyone. Mr Shiels said,
 8 from memory, that they were unsigned and certainly the
 9 ones that I'm looking at, at the moment, if we can have
 10 them on screen, that appears to be correct. So we have
 11 PNI00000001_080. So that coversheet, if we can just
 12 scroll down a little, confirms handing of the envelope
 13 containing primary disclosure and we've checked beneath
 14 that and the signature doesn't take us any further on
 15 who was handing over the envelope. It's an unknown
 16 person.
 17 Going over two pages, please, we have the police
 18 schedule of non-sensitive material. If we scroll down
 19 to the bottom, please, the Disclosure Officer box
 20 signature and date is blank but there is a signature for
 21 signed DPP Prosecutor, and that, having looked behind
 22 the redaction, appears to be Mr Shiels' signature.
 23 **SIR WYN WILLIAMS:** Yes.
 24 **MS PRICE:** Perhaps, sir, if I may just ask a question
 25 relating to that in a moment.
 48

1 **SIR WYN WILLIAMS:** Of course.

2 **MS PRICE:** There is one more page of this document on
3 page 16, again schedule of non-sensitive material, this
4 is page 14, internal 14, which I think Mr Shiels was
5 referring to. Scrolling down to the bottom, please, we
6 can see, again, there's a redacted signature and that
7 signature also appears to be Mr Shiels' signature but
8 there is no additional signature there.

9 **SIR WYN WILLIAMS:** Mm-hm.

10 **MS PRICE:** So Mr Shiels, was this the document you had in
11 mind when you were, from memory, saying that the
12 schedule was unsigned?

13 **A.** Yes.

14 **Q.** In circumstances where it was unsigned by the Disclosure
15 Officer, can you assist with why you signed the document
16 or the circumstances in which you did, absent
17 a signature of the Disclosure Officer?

18 **A.** On the basis that all the documents purporting to be in
19 the disclosure schedule were present and correct and on
20 the file that I read.

21 **MS PRICE:** Sir, do you have any further questions on this
22 before I turn to my --

23 **SIR WYN WILLIAMS:** No, thank you. Thanks for your research
24 over the break, Ms Price.

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

49

1 indicative of the police and prosecutors being reliant
2 on the Post Office for guidance on technical matters
3 relating to Post Office procedures?

4 **A.** Yes.

5 **Q.** Were you aware at the time that further disclosure
6 requests had been made in the case as set out in this
7 letter? So if we can scroll down, please. There is
8 a reference to the meeting with Ms Winter and "We would
9 be obliged if you would provide us with the following
10 information", and then just scrolling down slowly, that
11 page and over to the next.

12 So were you aware of this second set of requests in
13 July 2013 for further documents from the accountants to
14 Ms Winter?

15 **A.** No, I was not aware.

16 **Q.** At point 3 here, we have this:
17 "We have been informed that on one of the occasions
18 Mrs McKelvey requested assistance Garry Groogan came to
19 the Post Office to assist in the reconciliation of a P&A
20 report [Pensions and Allowances]. The report could not
21 be reconciled and Mr Groogan asked Lisahally to check
22 number of weeks for any inconsistencies in P&A reports.
23 Can you provide details of:
24 "(a) When Mr Groogan contacted Lisahally in relation
25 to this matter?"

51

1 You refer at paragraph 31 of your statement,
2 Mr Shiels, to a letter dated 28 July 2004, from
3 Mrs McKelvey's solicitors. Could we have that on
4 screen, please, it is PNI00000001_072. It's page 3 of
5 that document, please. This is the letter from
6 Mrs McKelvey's solicitors, dated 28 July 2004, sent to
7 the Department of the Director of Public Prosecutions at
8 the Omagh Courthouse address.

9 Would this have been something that came to you, or
10 not?

11 **A.** No, it never came to me.

12 **Q.** The letter enclosed correspondence from the accountants
13 instructed on behalf of Mrs McKelvey to Suzanne Winter,
14 and we can see that if we go over the page, please. I do
15 not intend to take you through the detail of this
16 correspondence, in light of the fact that you say you
17 would not have seen it at the time but were you aware,
18 at the time, of the fact that Mrs McKelvey's accountants
19 had met with and corresponded with Ms Winter directly in
20 the case?

21 **A.** No, I was not aware.

22 **Q.** Was that something which you would have considered usual
23 or unusual in a case of this nature?

24 **A.** I would consider it extremely unusual.

25 **Q.** To the extent that you can say, do you think this was

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1 "(b) What week originally prompted the checking of
2 P&A reports?
3 "(c) What other weeks were checked and what, if any,
4 inconsistencies were found?
5 "(d) Provide details of reports produced by
6 Lisahally, either written or verbal, in relation to
7 Mr Groogan's request."

8 Was this point the suggestion that Mrs McKelvey
9 experienced problems reconciling the pensions and
10 allowances report, problems which were reported to Garry
11 Groogan, raised with you at the time?

12 **A.** No, they were not.

13 **Q.** Have you been able to establish on your review of the
14 papers what happened in respect of this request?

15 **A.** No. There was no further material sent to the PPS or
16 the DPP on the foot of that request. But that request
17 was sent to Mrs Winters and it looked like the forensic
18 accountants are liaising directly with her and keeping
19 the DPP and, in fact, the police out of the loop
20 entirely. And that was only sent by Mrs Winters -- or,
21 sorry, Mrs McKelvey's solicitor to the DPP in Omagh.
22 I think you read out "for reference only". I think they
23 intended it as -- just they sent them to the DPP for
24 information. They weren't asking the DPP to act on it.

25 **Q.** Could we have on screen, please, page 8 of Mr Shiels'

52

1 statement. At paragraphs 34 and 35 you say this:
 2 "On 7 September 2004 the defence solicitors wrote to
 3 DPP staff based at Omagh Courthouse asking the DPP to
 4 consider whether the public interest limb of the test
 5 for prosecution was still met in light of an enclosed
 6 medical report on Mrs McKelvey. Within the Inquiry
 7 materials is a handwritten note from a DPP clerk passing
 8 the correspondence to me for urgent reply.

9 "There is a handwritten file note created by me
 10 dated 10 September 2004 in respect of a telephone call
 11 to Mrs McKelvey's solicitor Stephen Atherton in which
 12 I expressed sympathy for his client's health problems
 13 but concluded that there was nothing in the report that
 14 would influence me to alter my original decision to
 15 prosecute."

16 I'm not going to ask you about the detail of your
 17 decision in relation to the public interest grounds but,
 18 when you did that review, did you review whether the
 19 evidential test continued to be met?

20 **A.** No, I did not.

21 **Q.** Why not?

22 **A.** There was no further material for me to review.

23 **Q.** You deal at paragraph 36 of your statement with the
 24 trial and you say:

25 "The trial in this matter was listed to commence on
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1 **MS PRICE:** He's not aware, I think, was the answer.

2 So you can't assist us one way or the other on that?

3 **A.** No.

4 **Q.** Finally, from me, Mr Shiels, the Inquiry has heard from
 5 Ms Winter that there came a point in time when the
 6 Police Service Northern Ireland required there to be
 7 a statement from Fujitsu attesting that the computer was
 8 working correctly and reliable in relevant Post Office
 9 cases referred for prosecution. Do you recall being
 10 aware of the introduction of this requirement?

11 **A.** No.

12 **MS PRICE:** Sir, those are all the questions I have. Do you
 13 have any questions before I turn to Core Participants?

14 **Questioned by SIR WYN WILLIAMS**

15 **SIR WYN WILLIAMS:** Yes, just one aspect I'd like to explore
 16 a little with you, Mr Shiels. The impression, let's use
 17 that word, that I have at the moment, is that, following
 18 your decision to prosecute, no one within the DPP team,
 19 to use a loose expression, thought it necessary to refer
 20 requests, for example, relating to secondary disclosure,
 21 to the person who'd actually taken the decision to
 22 prosecute, all right? That seems clear from this
 23 correspondence trail. Was that usual at the time or was
 24 it just one of those things, that people might say?

25 **A.** No, it was usual for two locations, one being Omagh and
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1 13 September 2004 when a jury was empanelled. The trial
 2 ran for 3 days until 16 September 2004 when the jury
 3 returned a not guilty verdict. During the currency of
 4 the trial I am not aware if any issues whether
 5 disclosure or otherwise were brought to my attention.
 6 Such issues, if any, would normally have been dealt with
 7 by those prosecutors situated in the DPP office in Omagh
 8 Courthouse."

9 Were you at the trial?

10 **A.** No, I was not.

11 **Q.** Was the outcome of the trial reported to you at the
 12 time?

13 **A.** No, it was not, which is not unusual.

14 **Q.** Does it follow that you are unable to assist us with
 15 whether there was any review of the case done either by
 16 the PSNI or the PPS?

17 **A.** From memory there was no review done by the PPS. I was
 18 not asked to offer my views on the file in the
 19 prosecution. So no, in relation to the PPS, I don't
 20 think there was any review conducted.

21 **Q.** It may follow from your answers but, as far as you were
 22 aware, was there any review of the case done by the Post
 23 Office after Mrs McKelvey's acquittal?

24 **A.** I'm not aware.

25 **THE COURT REPORTER:** I'm sorry --
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1 the other one being Belfast Crown Court, because each of
 2 those two courthouses had their own team of prosecutors
 3 who would have dealt with post-decision disclosure
 4 issues and any other matters that arose during the
 5 currency of trials in those locations. Other Crown
 6 Courts didn't have those in-house prosecutors or
 7 prosecutors on site, so to speak.

8 **SIR WYN WILLIAMS:** Is that still the position?

9 **A.** No, it's not. It's not --

10 **SIR WYN WILLIAMS:** In the current -- in 2024, the same
 11 prosecutor would be consulted on all important steps
 12 once a prosecution was instigated; is that right?

13 **A.** That is correct, yes.

14 **SIR WYN WILLIAMS:** Yes, fine. I ask the question, in part
 15 because when it came to deciding whether Mrs McKelvey's
 16 health should be a bar to her prosecution, they did
 17 consult you?

18 **A.** They did, yes.

19 **SIR WYN WILLIAMS:** I take it that was because the instigator
 20 of the prosecution was then thought to be the
 21 appropriate person to decide whether to put an end to
 22 it?

23 **A.** Yes.

24 **SIR WYN WILLIAMS:** Yes, all right. Fine. Yes, thank you
 25 very much.
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1 **MS PRICE:** Sir, I think Mr Jacobs has some questions.
 2 **Questioned by MR JACOBS**
 3 **MR JACOBS:** Mr Shiels, I represent Maureen McKelvey.
 4 You made some admissions in your evidence this
 5 morning. At 10.55 you accepted that the investigation
 6 report didn't sufficiently address the possibility of
 7 human or computer error as an alternative explanation in
 8 this case. You've also confirmed that the helpline call
 9 log documents were not brought to your attention, and you
 10 said that that might have changed your view on whether
 11 the prosecution test was met. You also accept that that
 12 you have, perhaps unsurprisingly, a lack of knowledge in
 13 Post Office accounting processes and that you were
 14 reliant on Post Office for technical matters. So that's
 15 what you've told the Inquiry this morning.
 16 You weren't made aware of the fact that Mrs McKelvey
 17 was acquitted in September 2004. Why was that; why
 18 weren't you told about that?
 19 **A.** It wouldn't be usual to be told whether somebody was
 20 acquitted or convicted.
 21 **Q.** Mrs McKelvey has said, and it's been put to witnesses,
 22 that the trial judge after the acquittal made a number
 23 of comments and one of the things he said was that the
 24 Post Office case has been a sham. You were asked by
 25 Ms Price whether there was any review of the outcome of

57

1 **A.** I would agree with that statement, yes.
 2 **Q.** Do you think that, perhaps, if there had been a review
 3 and, of course, you can only speculate but that it might
 4 have thrown up the fact that certain information that
 5 should have been provided to you by the Post Office
 6 wasn't?
 7 **A.** Yes. I agree with that.
 8 **Q.** I'm just asked to raise one other point with you. We
 9 understand that 29 subpostmasters were prosecuted in
 10 Northern Ireland. Had there been a review in 2004, as
 11 a prosecutor yourself, do you think that might have
 12 changed how matters were dealt with in investigations
 13 going forward?
 14 **A.** Possibly, yes. Possibly.
 15 **MR JACOBS:** Thank you. I haven't any more questions for
 16 you.
 17 **SIR WYN WILLIAMS:** I think all things are possible,
 18 Mr Shiels, as they say. So possibly is a good answer to
 19 that last question.
 20 Thank you, Mr Shiels, for making yourself available.
 21 As a matter of interest, actually, the documents
 22 which you produced as part of your paragraphs -- or
 23 let's say from paragraphs 25 onwards, which weren't
 24 drawn to your attention but you discovered, was that
 25 because we sent them to you or did you send them to us?

59

1 the occasion.
 2 Now, you said that you didn't know about the outcome
 3 of the case. Are you able to explain why, when a case
 4 is rejected, in the way that it was and in light of the
 5 comments that a judge may have made, why PPS wouldn't
 6 conduct a review?
 7 **A.** Well, if the judge made those comments, I would expect
 8 a review to be carried out.
 9 **Q.** I'm sorry, I didn't hear that. Speak up, please.
 10 **A.** If the judge did make those comments, I would expect
 11 a review or -- certainly to be carried out or questions
 12 to be asked.
 13 **Q.** But you weren't even told about the outcome, were you,
 14 Mr Shiels?
 15 **A.** No, no.
 16 **Q.** You also have said that you weren't aware of any Post
 17 Office review and, certainly, one can infer from that
 18 that the PPS weren't involved in any review with the
 19 Post Office concerning the acquittal.
 20 **A.** No, as far as I'm aware, there was no review.
 21 **Q.** Do you think that, in circumstances where a company or
 22 a commercial organisation is an alleged victim and the
 23 sole investigator, that there's a risk that information
 24 provided to a Prosecution Authority may not always be
 25 balanced or objective?

58

1 **A.** I believe we sent them to you.
 2 **SIR WYN WILLIAMS:** Well, then, thank you very much for being
 3 thorough enough to find them.
 4 Right. Good. We will resume tomorrow, I take it,
 5 Ms Price?
 6 **MS PRICE:** Yes, sir, 10.00 for Mr Ward.
 7 **SIR WYN WILLIAMS:** Thank you.
 8 **MS PRICE:** Thank you.
 9 **(12.02 pm)**
 10 **(The hearing adjourned until 10.00 am the following day)**

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I N D E X

KEVIN PHILIP SHIELS (sworn)	1
Questioned by MS PRICE	1
Questioned by SIR WYN WILLIAMS	55
Questioned by MR JACOBS	57

<p>MR JACOBS: [2] 57/3 59/15</p> <p>MS PRICE: [28] 1/3 1/5 1/9 28/8 32/4 33/25 34/7 35/10 35/17 35/20 35/23 36/1 47/14 47/17 47/20 47/24 48/1 48/6 48/24 49/2 49/10 49/21 49/25 55/1 55/12 57/1 60/6 60/8</p> <p>SIR WYN WILLIAMS: [35] 1/4 1/6 27/19 28/1 28/7 31/25 33/21 34/2 34/12 34/19 34/25 35/5 35/9 35/11 35/15 35/19 35/22 35/24 47/16 47/19 47/25 48/5 48/23 49/1 49/9 49/23 55/15 56/8 56/10 56/14 56/19 56/24 59/17 60/2 60/7</p> <p>THE COURT REPORTER: [1] 54/25</p>	<p>12.02 [1] 60/9 13 [2] 29/13 34/2 13 June [1] 37/10 13 September [1] 54/1 14 [5] 32/4 32/5 35/2 49/4 49/4 148 [1] 12/2 15 May [1] 45/20 15/05/02 [1] 46/14 150 [2] 20/8 20/9 152.80 [3] 15/1 21/18 22/7 16 [1] 49/3 16 August [1] 43/19 16 September 2004 [1] 54/2 17 [1] 33/8 17 May [1] 33/4 18 [1] 36/2 18 January [1] 1/16 19 [2] 36/3 36/14 19 February [1] 5/18 19 September [1] 42/1 1969 [1] 25/16 1989 [2] 15/4 16/10 1991 [1] 2/7 1996 [1] 33/16 1st [1] 25/11</p>	<p>26 September [1] 45/20 26/09/01 [1] 46/14 27 July [2] 41/1 41/3 27 May [2] 16/8 26/18 28 January [1] 6/15 28 July [2] 50/2 50/6 29 [1] 59/9</p> <hr/> <p>3</p> <p>3 days [1] 54/2 30 July [5] 41/10 41/12 43/5 43/15 47/6 31 [1] 50/1 31 January 2024 [1] 1/1 34 [1] 53/1 35 [1] 53/1 36 [1] 53/23</p> <hr/> <p>4</p> <p>4 April [3] 21/16 22/5 26/17 4 April 2002 [1] 21/12 4,623.48 [4] 17/4 21/6 21/13 25/14 4.54-4.59 [1] 33/14 4.59 [1] 33/14 40p [1] 12/1</p> <hr/> <p>7</p> <p>7 March [1] 42/1 7 September [1] 53/2 76 [1] 18/10 7A [1] 33/15</p>	<p>51/13 52/18 accounted [2] 10/12 10/14 accounting [7] 10/10 10/22 11/14 17/3 21/5 27/2 57/13 accounts [1] 44/21 accused [3] 7/8 31/17 31/18 acquittal [3] 54/23 57/22 58/19 acquitted [2] 57/17 57/20 across [1] 43/22 act [5] 21/14 24/14 25/16 33/16 52/24 acted [1] 23/16 action [4] 6/22 16/21 17/7 20/20 actions [1] 17/1 acts [1] 24/15 actual [2] 21/22 37/21 actually [4] 27/21 34/13 55/21 59/21 additional [4] 16/2 16/6 16/14 49/8 address [5] 6/11 28/10 36/2 50/8 57/6 addressed [2] 2/22 42/17 adequacy [1] 5/3 adjourned [1] 60/10 adlist [3] 11/9 12/24 13/15 adlisted [1] 10/19 admission [1] 7/6 admissions [3] 15/12 16/15 57/4 advance [1] 10/4 after [6] 4/7 10/3 26/21 39/3 54/23 57/22 again [3] 36/22 49/3 49/6 against [2] 7/8 26/22 Agency [3] 3/20 14/17 40/2 agent [1] 3/8 agree [6] 13/15 13/17 28/9 28/12 59/1 59/7 alerted [2] 14/11 32/9 alia [1] 29/1 all [33] 3/22 6/8 8/7 8/13 10/17 10/21 10/21 10/25 11/3 11/11 11/13 18/22 18/25 22/15 22/16 23/3 28/7 31/2 34/6 35/9 35/23 39/20 39/25 40/10 40/13 44/21 47/2 49/18 55/12 55/22 56/11 56/24 59/17</p>	<p>allegation [1] 13/25 alleged [3] 24/12 24/13 58/22 alleging [2] 21/7 26/9 allocated [5] 5/18 8/12 8/15 8/19 27/3 allowance [10] 9/21 10/15 12/6 12/14 13/8 13/23 14/15 15/22 15/25 16/7 allowances [11] 9/17 10/12 10/13 10/25 11/1 11/4 11/24 12/3 21/19 51/20 52/10 already [1] 40/22 also [9] 3/6 17/8 29/17 32/12 45/6 49/7 57/8 57/11 58/16 alter [1] 53/14 alternative [5] 13/11 14/5 23/21 28/11 57/7 alternatives [1] 13/16 although [4] 7/5 21/20 38/20 42/16 always [1] 58/24 am [9] 1/2 32/18 41/15 46/5 46/10 47/21 47/23 54/4 60/10 amended [1] 33/16 amount [6] 9/24 20/6 24/12 25/21 26/8 45/2 amounts [1] 11/8 analysis [1] 21/19 answer [6] 32/1 33/25 34/5 34/11 55/1 59/18 answers [1] 54/21 anticipation [1] 24/19 any [50] 3/1 3/3 4/12 5/2 7/21 8/12 8/15 8/19 18/25 19/12 21/20 22/4 22/8 23/18 23/19 24/4 27/4 31/2 32/9 32/10 32/16 32/22 32/24 36/16 36/23 37/13 38/2 38/16 44/15 46/11 46/23 47/2 47/9 47/9 48/6 48/14 49/21 51/22 52/3 54/4 54/6 54/15 54/20 54/22 55/13 56/4 57/25 58/16 58/18 59/15 anyone [4] 33/24 44/11 44/22 48/7 anything [3] 18/16 31/24 41/22 apart [1] 13/12 apologies [1] 25/1 appear [1] 37/22 appearing [2] 1/12</p>
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<p>A</p> <p>appearing... [1] 12/21</p> <p>appears [8] 25/24 42/25 43/14 44/4 45/21 48/10 48/22 49/7</p> <p>applies [1] 23/1</p> <p>applying [1] 5/21</p> <p>appointed [2] 7/15 7/16</p> <p>appraised [1] 14/14</p> <p>appropriate [3] 6/24 16/23 56/21</p> <p>April [6] 14/23 18/2 21/12 21/16 22/5 26/17</p> <p>April 2002 [1] 14/23</p> <p>are [38] 1/24 2/1 4/20 8/6 10/1 10/7 10/12 10/13 10/16 10/22 10/24 11/4 15/5 15/15 16/19 17/1 20/15 22/2 28/1 29/5 30/10 32/14 33/13 33/16 33/17 35/5 37/18 37/23 42/2 43/8 43/10 46/9 47/1 52/18 54/14 55/12 58/3 59/17</p> <p>Area [1] 40/4</p> <p>aren't [1] 37/24</p> <p>arisen [1] 38/16</p> <p>arising [1] 27/10</p> <p>arose [2] 26/20 56/4</p> <p>arrangements [2] 14/14 16/5</p> <p>arrived [1] 5/9</p> <p>as [67]</p> <p>ascending [1] 10/18</p> <p>ask [8] 5/11 12/6 23/13 23/25 27/19 48/24 53/16 56/14</p> <p>asked [11] 6/6 15/12 23/21 30/7 41/4 48/3 51/21 54/18 57/24 58/12 59/8</p> <p>asking [5] 1/13 13/8 37/4 52/24 53/3</p> <p>aspect [5] 17/3 20/25 21/5 24/10 55/15</p> <p>assess [2] 6/8 44/12</p> <p>assessment [6] 8/3 15/14 20/19 27/4 27/11 45/2</p> <p>assist [7] 1/12 37/15 47/2 49/15 51/19 54/14 55/2</p> <p>assistance [4] 34/21 40/7 48/6 51/18</p> <p>at [96]</p> <p>Atherton [6] 15/6 15/23 16/1 16/5 16/12 53/11</p>	<p>attach [1] 8/8</p> <p>attached [3] 10/1 42/15 43/5</p> <p>attempt [1] 24/11</p> <p>attended [1] 14/22</p> <p>attention [11] 32/11 32/15 36/16 43/7 44/3 44/7 44/21 45/11 54/5 57/9 59/24</p> <p>attesting [1] 55/7</p> <p>audit [11] 14/24 14/25 15/2 21/16 21/21 22/4 22/5 22/6 22/18 26/16 38/2</p> <p>August [5] 25/12 41/24 42/6 43/19 46/9</p> <p>authenticating [1] 35/6</p> <p>authored [1] 9/15</p> <p>authorisation [1] 17/2</p> <p>authorised [1] 10/5</p> <p>Authority [1] 58/24</p> <p>availability [1] 16/25</p> <p>available [3] 38/3 41/19 59/20</p> <p>aware [23] 4/6 4/10 4/20 18/6 19/25 36/23 38/1 44/17 47/11 47/13 50/17 50/21 51/5 51/12 51/15 54/4 54/22 54/24 55/1 55/10 57/16 58/16 58/20</p> <p>away [1] 23/4</p> <hr/> <p>B</p> <p>back [8] 6/12 21/1 25/7 28/13 33/25 42/11 43/18 47/17</p> <p>background [2] 2/5 9/16</p> <p>balance [3] 13/2 20/9 20/11</p> <p>balanced [2] 20/6 58/25</p> <p>bar [1] 56/16</p> <p>based [4] 27/21 38/24 43/24 53/3</p> <p>basis [6] 11/21 13/10 24/8 27/23 44/14 49/18</p> <p>be [49] 1/13 5/9 5/25 7/12 10/3 11/7 15/21 19/14 24/1 25/24 26/12 26/22 27/5 28/16 28/18 28/25 29/3 31/13 31/24 33/22 34/21 36/25 37/15 41/22 42/2 42/5 42/25 43/9 44/9 46/12 47/8 47/14 48/10 48/22 49/7 49/18 51/9 51/21 53/19 55/6</p>	<p>56/11 56/16 56/20 57/19 57/19 58/8 58/11 58/12 58/24</p> <p>became [1] 3/25</p> <p>because [13] 13/10 19/19 20/5 24/12 26/8 27/15 28/2 30/17 40/21 56/1 56/15 56/19 59/25</p> <p>been [46] 3/7 7/24 8/17 10/4 12/8 13/4 13/19 14/10 14/10 18/3 18/20 18/21 21/16 23/9 23/18 26/13 27/8 28/8 28/22 29/7 29/18 30/20 30/23 36/16 36/19 36/23 37/14 40/22 42/22 45/10 45/13 46/11 46/13 46/16 46/21 47/8 50/9 51/6 51/17 52/13 54/6 57/21 57/24 59/2 59/5 59/10</p> <p>before [11] 3/16 7/10 8/21 17/24 18/17 33/21 42/8 46/20 48/1 49/22 55/13</p> <p>behalf [5] 1/14 14/16 26/13 37/7 50/13</p> <p>behind [2] 34/10 48/21</p> <p>being [26] 3/1 3/7 6/6 7/12 8/12 8/19 11/9 14/7 15/12 20/12 22/7 22/12 22/16 22/20 24/6 31/3 32/19 32/21 37/13 43/16 47/10 51/1 55/9 55/25 56/1 60/2</p> <p>Belfast [2] 43/19 56/1</p> <p>belief [1] 1/25</p> <p>believe [4] 18/19 24/7 41/22 60/1</p> <p>belonging [1] 25/14</p> <p>below [2] 3/3 28/14</p> <p>beneath [1] 48/13</p> <p>Benefits [1] 14/17</p> <p>best [4] 1/24 15/9 16/16 18/19</p> <p>better [1] 38/2</p> <p>between [6] 12/17 14/5 21/11 22/19 25/11 39/21</p> <p>blank [1] 48/20</p> <p>bodies [3] 3/15 3/19 3/23</p> <p>book [5] 9/22 9/22 10/2 10/5 10/8</p> <p>books [1] 20/11</p> <p>both [3] 10/6 11/10 34/23</p> <p>bottom [10] 6/13</p>	<p>9/18 10/20 18/11 18/14 21/3 25/5 45/24 48/19 49/5</p> <p>bought [1] 57/9</p> <p>box [1] 48/19</p> <p>branch [3] 7/13 12/22 36/7</p> <p>break [4] 5/11 47/15 47/22 49/24</p> <p>Brian [1] 40/25</p> <p>briefings [1] 4/13</p> <p>brought [2] 32/10 54/5</p> <p>bundle [1] 27/23</p> <p>but [26] 5/12 18/5 20/10 20/17 23/15 26/11 26/24 27/7 27/15 30/19 31/8 35/5 35/15 36/22 39/4 44/14 48/20 49/7 50/17 52/16 53/13 53/17 54/21 58/13 59/3 59/24</p> <hr/> <p>C</p> <p>C2 [1] 43/23</p> <p>call [10] 1/5 41/24 44/8 44/17 45/19 46/9 46/19 47/7 53/10 57/8</p> <p>called [2] 2/6 4/4</p> <p>came [6] 3/24 50/9 50/11 51/18 55/5 56/15</p> <p>can [37] 1/3 1/4 3/19 4/24 5/25 8/7 9/2 10/3 17/17 18/9 18/22 19/21 21/8 25/3 25/5 26/3 30/10 33/22 34/10 34/11 35/11 35/21 39/14 43/18 45/24 47/17 47/24 48/9 48/11 49/6 49/15 50/14 50/25 51/7 51/23 58/17 59/3</p> <p>can't [3] 26/24 26/25 55/2</p> <p>cannot [2] 42/2 43/9</p> <p>carried [4] 4/14 10/19 58/8 58/11</p> <p>case [54] 3/3 3/4 3/6 3/6 3/10 4/1 5/15 6/10 7/10 8/10 8/12 8/15 9/5 17/3 19/16 21/1 21/5 22/23 23/9 23/10 23/19 23/22 24/9 24/18 26/15 27/3 27/12 28/11 28/16 28/23 29/10 30/2 30/8 30/13 31/3 31/21 32/20 33/5 33/20 35/25 36/20 38/9 38/16 47/10 47/12 50/20 50/23 51/6 54/15 54/22 57/8</p>	<p>57/24 58/3 58/3</p> <p>cases [10] 3/16 3/21 3/23 4/7 4/17 4/22 7/20 7/22 8/17 55/9</p> <p>cash [5] 11/2 11/3 25/14 36/13 37/23</p> <p>catch [1] 31/25</p> <p>caused [2] 19/15 45/13</p> <p>causes [1] 36/7</p> <p>causing [1] 20/16</p> <p>certain [2] 27/8 59/4</p> <p>certainly [5] 47/16 47/19 48/8 58/11 58/17</p> <p>Chambers [1] 43/20</p> <p>changed [3] 45/16 57/10 59/12</p> <p>charge [8] 22/12 22/17 24/9 25/7 25/17 28/23 30/9 41/5</p> <p>Charges [1] 21/10</p> <p>check [1] 51/21</p> <p>check' [1] 11/23</p> <p>checked [4] 29/5 31/21 48/13 52/3</p> <p>checking [4] 15/24 22/1 31/13 52/1</p> <p>checks [4] 11/19 14/18 15/21 20/23</p> <p>Chief [3] 25/4 25/25 28/13</p> <p>Circuit [1] 28/25</p> <p>circumstances [3] 49/14 49/16 58/21</p> <p>cited [2] 22/12 36/6</p> <p>claimed [1] 20/6</p> <p>claiming [5] 12/2 12/5 12/13 13/7 13/22</p> <p>claims [1] 13/20</p> <p>Clanabogan [9] 9/9 9/11 11/25 14/16 14/22 21/12 37/20 40/14 46/18</p> <p>clear [1] 55/22</p> <p>clearly [1] 36/19</p> <p>clerk [3] 28/25 31/13 53/7</p> <p>client's [1] 53/12</p> <p>Co [1] 42/16</p> <p>Code [2] 5/23 33/14</p> <p>Codes [2] 15/4 16/10</p> <p>cognisance [1] 27/14</p> <p>Colin [2] 41/12 41/14</p> <p>colleague [1] 40/25</p> <p>colleagues [1] 8/16</p> <p>collect [1] 9/21</p> <p>come [7] 16/18 19/21 26/21 32/20 33/25 39/2 47/17</p> <p>Commander [1] 29/6</p> <p>commence [1] 53/25</p> <p>comment [1] 44/8</p> <p>comments [4] 57/23</p>
---	---	---	--	--

C	31/8	counter [1] 10/13	dealing [2] 3/21 3/23	Directing [3] 33/9
comments... [3] 58/5	Consignia [1] 14/21	counterfoil [2] 10/1	dealt [6] 8/11 38/15	33/11 33/17
58/7 58/10	consisted [1] 4/3	10/6	40/21 54/6 56/3 59/12	direction [7] 24/18
commercial [1]	Constable [14] 7/17	counterfoils [1] 13/5	December [1] 9/13	28/13 28/22 29/1 29/2
58/22	25/4 25/25 28/13	County [1] 25/13	decide [2] 24/8 56/21	29/7 29/10
committal [16] 24/22	29/20 30/1 30/14	course [4] 39/6 46/12	decided [2] 17/14	directions [10] 23/16
27/23 28/19 28/20	30/19 37/4 39/11	49/1 59/3	24/17	28/20 29/2 29/8 29/9
28/20 29/2 29/4 29/8	41/10 42/13 43/15	court [4] 5/25 25/13	deciding [2] 20/1	29/11 30/4 30/6 31/21
29/11 30/4 30/6 31/12	44/7	38/17 56/1	56/15	39/16
31/15 31/16 31/24	consult [1] 56/17	Courthouse [4]	decision [14] 6/7	directly [2] 50/19
32/3	consulted [1] 56/11	38/13 50/8 53/3 54/8	7/11 8/21 17/21 17/24	52/18
communication [1]	contact [2] 4/20	courthouses [1] 56/2	18/7 19/1 26/20 27/21	Director [6] 2/11 3/17
25/6	41/14	Courts [1] 56/6	53/14 53/17 55/18	4/2 4/11 5/1 50/7
company [1] 58/21	contacted [1] 51/24	covered [2] 42/23	55/21 56/3	discharge [1] 33/12
compared [1] 14/7	contained [6] 6/11	46/5	defence [12] 32/19	disclosable [1] 36/25
compiling [1] 42/8	6/16 6/19 27/17 27/22	covering [5] 6/16	33/20 35/25 36/5	disclose [1] 37/13
completed [3] 2/5	44/18	6/25 8/4 10/2 35/18	36/15 36/22 37/3	disclosed [7] 31/24
15/21 38/8	containing [2] 31/14	coversheet [1] 48/11	37/12 37/16 37/17	32/3 32/11 36/19
completion [2] 11/3	48/13	Coyle [10] 29/20 30/1	38/19 53/2	37/15 40/22 47/9
16/4	contains [1] 9/23	30/15 30/19 37/4	defendant [1] 7/6	disclosure [67]
compliance [1] 28/24	contents [2] 1/24	39/11 41/10 41/12	deliberate [9] 6/22	discount [1] 24/13
computer [21] 12/24	36/15	42/13 44/7	16/21 17/7 19/9 20/20	discovered [1] 59/24
13/15 18/4 18/21	context [2] 18/24	Coyle's [1] 43/15	23/22 24/14 24/14	discrepancies [14]
18/25 19/14 19/17	39/13	created [2] 11/10	26/22	6/21 12/8 14/11 15/8
20/15 23/23 26/10	continued [2] 2/14	53/9	dense [1] 28/19	15/11 16/20 17/6
26/10 28/11 37/20	53/19	credit [1] 36/10	Department [8] 2/11	19/15 20/19 26/15
40/6 40/16 42/4 43/10	continuing [1] 33/16	criminal [8] 2/9 3/11	3/17 4/2 4/10 5/1 5/6	26/20 44/20 45/1 45/7
44/10 45/8 55/7 57/7	contrary [2] 21/14	7/13 15/3 16/9 33/15	5/10 50/7	discrepancy [1]
computing [3] 13/2	25/15	42/13 44/2	detachable [4] 9/23	20/16
14/2 27/2	convenient [1] 47/14	crossed [1] 40/20	10/1 10/6 10/7	discuss [1] 41/21
concerning [1] 58/19	convicted [1] 57/20	Crown [3] 38/16 56/1	detached [1] 10/9	discussed [3] 3/3
concerns [1] 31/2	conviction [1] 6/2	56/5	detail [3] 28/9 50/15	4/17 42/19
conclude [1] 18/17	copied [1] 41/22	Curran [2] 41/1 41/4	53/16	discussion [1] 18/13
concluded [1] 53/13	copies [1] 37/19	currency [2] 54/3	detailing [1] 6/21	dishonesty [1] 24/10
conclusion [8] 12/7	copy [13] 1/15 1/20	56/5	details [2] 51/23 52/5	dismiss [1] 19/18
12/11 13/6 13/9 13/19	12/23 28/21 29/1 29/2	current [1] 56/10	Detective [14] 6/16	dispatched [2] 11/5
13/24 15/2 15/20	29/5 29/7 29/8 30/7	currently [2] 17/3	7/2 7/3 7/16 29/20	11/24
conclusions [2]	34/8 40/18 43/11	21/5	30/1 30/14 30/19 37/4	District [2] 29/6 40/5
17/11 40/10	Core [1] 55/13	customer [1] 10/8	39/11 41/10 42/13	Division [1] 25/13
conduct [1] 58/6	correct [23] 2/8 2/10	Customers [1] 9/21	43/15 44/7	do [21] 1/16 1/17
conducted [10] 3/11	2/17 2/21 3/9 12/7	cut [1] 43/22	diary [1] 41/20	1/20 1/21 3/1 6/8
11/20 11/20 17/23	20/21 22/21 24/21	D	did [50] 2/13 3/15 4/1	18/19 18/22 27/3
21/16 21/21 22/5	24/24 26/2 27/25 28/6	daily [2] 10/15 10/16	6/5 7/9 8/12 8/19 11/7	29/14 33/2 35/20
23/15 26/16 54/20	34/18 35/13 35/14	Dale [1] 45/24	12/6 12/20 14/4 17/10	45/10 49/21 50/14
conducting [2] 11/23	37/2 38/23 42/10	Dale's [1] 46/20	17/12 17/24 17/25	50/25 55/9 55/12
14/25	43/23 48/10 49/19	data [7] 3/2 8/11 8/20	18/19 18/25 19/3	58/21 59/2 59/11
confirm [1] 1/9	56/13	24/5 26/10 32/17 38/3	19/12 19/18 20/4	document [14] 9/14
confirmed [1] 57/8	correctly [1] 55/8	date [9] 9/12 9/24	20/14 20/18 21/21	21/3 21/9 25/1 34/4
confirms [2] 41/4	corresponded [1]	10/7 21/11 25/11	22/4 22/22 23/17	34/5 35/18 37/22 39/9
48/12	50/19	41/25 45/20 46/9	23/25 24/4 24/8 25/17	42/12 49/2 49/10
consider [8] 14/4	correspondence [6]	48/20	25/18 26/19 28/9	49/15 50/5
19/12 20/14 23/8	39/21 46/4 50/12	dated [14] 1/16 25/5	30/22 31/2 32/22 33/1	documentation [4]
23/13 23/17 50/24	50/16 53/8 55/23	26/16 37/10 39/10	34/19 39/2 39/7 44/11	37/16 40/10 44/3
53/4	could [28] 1/9 1/18	41/1 41/3 41/10 43/5	49/16 53/18 53/18	46/25
considerable [1] 7/5	2/23 5/15 6/12 6/25	43/19 46/2 50/2 50/6	53/20 56/16 56/18	documents [16]
consideration [1]	15/7 15/11 21/1 23/10	53/10	58/10 59/25	30/18 37/21 37/23
5/14	23/15 24/25 25/2	dates [1] 22/17	didn't [8] 13/24 14/8	38/25 39/5 44/14
considered [11]	29/12 30/4 31/25 32/4	day [6] 10/3 22/5	18/22 31/25 56/6 57/6	44/15 44/18 44/24
13/18 17/9 17/14	37/8 38/5 39/8 41/1	25/11 25/12 31/15	58/2 58/9	45/10 46/7 46/11
19/17 24/5 26/3 31/19	41/10 42/11 44/9	60/10	differences [1] 22/19	49/18 51/13 57/9
32/2 36/25 37/12	45/22 50/3 51/20	days [1] 54/2	different [3] 3/22	59/21
50/22	52/25	deal [6] 28/23 33/8	43/24 44/1	does [3] 23/1 34/17
considering [2] 5/21	couldn't [1] 26/12	39/7 41/7 46/3 53/23	difficulties [1] 32/25	54/14
	Counsel [1] 35/1		direct [2] 23/10 23/15	doesn't [1] 48/14

D	enough [1] 60/3 enquiries [1] 32/22 ensure [2] 5/7 7/17 enter [1] 11/13 entered [3] 10/22 11/1 11/8 entering [1] 13/13 entirely [1] 52/20 entry [1] 41/20 envelope [4] 31/14 31/16 48/12 48/15 error [20] 6/23 13/13 13/14 16/22 17/8 18/3 18/21 18/24 19/5 19/7 19/17 19/17 19/18 23/23 23/23 28/11 32/21 36/8 45/8 57/7 errors [16] 14/1 14/1 14/3 19/14 19/14 19/14 20/15 24/13 24/14 26/4 26/8 26/12 27/5 27/9 27/9 45/2 essentially [1] 32/14 establish [2] 15/22 52/13 Eugene [3] 40/8 41/18 41/19 even [1] 58/13 events [1] 38/21 ever [2] 4/12 4/17 every [1] 8/5 everything [4] 5/7 15/8 16/16 18/19 evidence [22] 4/14 5/10 5/11 5/25 6/8 6/9 6/18 7/7 7/18 8/3 15/3 16/9 16/25 17/14 20/23 21/25 22/23 27/16 27/16 44/15 47/9 57/4 evidential [6] 6/2 23/10 23/19 24/8 27/16 53/19 examination [2] 16/2 16/4 examined [1] 12/1 example [2] 3/19 55/20 excuse [1] 21/25 exhibits [2] 42/24 46/6 existed [1] 32/10 existence [1] 20/14 existent [5] 12/3 12/5 12/13 13/8 13/22 expect [3] 20/9 58/7 58/10 expected [1] 37/15 experienced [1] 52/9 explain [3] 14/9 15/11 58/3 explained [1] 21/15 explains [1] 11/19 explanation [8] 9/20	10/11 16/13 19/13 23/14 42/3 45/7 57/7 explanations [4] 13/11 14/5 23/21 28/11 explicitly [1] 36/22 explore [1] 55/15 expressed [1] 53/12 expression [1] 55/19 expressly [1] 27/19 extent [4] 4/24 21/23 25/24 50/25 extremely [1] 50/24	F fact [9] 13/24 19/23 22/9 27/11 50/16 50/18 52/19 57/16 59/4 facts [4] 9/15 18/4 21/4 21/15 Failure [1] 36/12 fair [2] 15/13 15/14 far [6] 4/10 4/20 47/10 47/13 54/21 58/20 fastened [1] 10/2 February [4] 4/1 5/18 24/18 41/20 February 2004 [1] 4/1 feel [1] 7/7 fell [1] 31/24 Fermanagh [1] 25/13 figure [8] 13/3 15/22 20/25 21/7 22/6 22/8 22/11 22/14 figures [6] 12/18 12/21 12/23 13/13 14/6 22/20 file [23] 5/14 5/18 5/21 6/5 6/10 6/14 6/16 6/18 7/4 7/10 7/12 8/4 8/5 8/19 17/14 21/25 27/20 28/3 28/21 41/21 49/20 53/9 54/18 files [2] 6/8 7/17 final [2] 15/22 37/24 Finally [2] 40/17 55/4 find [6] 20/9 23/13 33/25 34/11 47/9 60/3 fine [4] 35/15 35/15 56/14 56/24 first [9] 8/10 9/16 15/18 18/2 18/12 22/6 26/16 39/4 39/20 five [1] 4/3 float [1] 36/13 foil [4] 10/6 10/7 10/9 10/9 foils [24] 9/20 9/23 10/1 10/16 10/17 10/18 11/4 11/8 11/10	11/15 11/24 12/3 12/6 12/14 12/17 12/23 13/4 13/8 13/14 13/23 14/6 18/13 22/1 22/19 follow [4] 6/5 38/21 54/14 54/21 followed [1] 28/16 following [12] 25/10 28/19 31/15 35/25 37/3 39/15 39/17 40/15 46/18 51/9 55/17 60/10 follows [5] 10/11 16/19 41/15 42/14 42/21 foot [1] 52/16 Force [1] 28/24 forensic [2] 39/16 52/17 Forgive [2] 15/17 43/22 form [6] 10/23 11/4 11/14 11/15 14/6 22/19 formally [7] 15/3 16/5 16/8 42/3 43/9 44/9 47/8 formed [1] 27/23 forward [1] 59/13 forwarded [2] 14/15 17/1 found [1] 52/4 four [2] 36/6 39/19 fourth [1] 40/17 frame [3] 25/22 26/4 45/3 friendly [1] 26/11 front [1] 1/14 Fujitsu [5] 38/3 42/4 47/7 47/11 55/7 full [3] 1/9 17/22 42/3 further [23] 6/19 15/21 19/13 21/19 21/21 24/2 35/20 37/16 37/22 38/2 38/9 41/7 44/3 44/11 46/23 47/2 47/4 48/14 49/21 51/5 51/13 52/15 53/22	generating [1] 13/15 give [2] 3/19 34/5 given [17] 4/12 8/2 8/15 12/20 15/5 16/11 17/5 17/8 17/20 20/25 21/25 25/2 27/1 27/4 27/7 29/3 32/21 gives [2] 18/24 34/3 giving [1] 39/23 go [7] 6/12 18/9 21/8 30/7 33/21 35/24 50/14 goes [1] 14/9 going [17] 9/2 9/6 9/14 15/17 18/10 24/25 25/7 27/19 28/13 30/10 36/3 42/12 43/18 43/19 48/17 53/16 59/13 good [3] 1/3 59/18 60/4 got [1] 33/22 grand [2] 10/23 10/25 grateful [1] 36/1 great [1] 8/8 Groogan [6] 40/4 41/18 51/18 51/21 51/24 52/11 Groogan's [1] 52/7 grounds [2] 38/10 53/17 group [9] 9/25 10/17 10/18 10/19 10/21 10/21 10/24 11/10 11/13 groups [1] 11/11 guidance [1] 51/2 guilt [2] 16/15 23/4 guilty [2] 33/4 54/3
E	each [6] 8/5 10/18 10/19 11/10 12/1 56/1 earlier [6] 23/8 23/21 34/10 45/2 45/8 48/3 effect [1] 35/6 either [4] 13/12 24/1 52/6 54/15 else [1] 18/16 empanelled [1] 54/1 employee [2] 3/8 30/18 employees [1] 9/1 enclose [3] 37/16 40/19 44/4 enclosed [6] 37/11 41/23 46/7 46/14 50/12 53/5 enclosures [2] 29/3 29/12 encountered [4] 40/14 44/19 44/24 46/17 end [4] 13/2 18/1 18/12 56/21 ended [1] 22/20 England [1] 23/2				H had [45] 7/9 7/21 7/23 7/23 8/17 12/8 12/15 13/4 13/19 14/9 15/8 15/12 17/9 17/22 20/4 21/8 21/16 23/18 24/7 26/21 27/8 27/14 30/7 30/17 30/18 32/24 32/25 36/16 36/23 38/8 38/18 40/22 41/4 42/7 45/13 46/16 46/21 47/6 48/7 49/10 50/19 51/6 56/2 59/2 59/10 half [1] 40/3 halfway [2] 9/8 11/21 hand [1] 31/16 handed [2] 28/22 31/14 handing [2] 48/12 48/15 handwritten [2] 53/7 53/9

H	40/6 40/16 42/4	I say [1] 26/11	include [2] 22/18	26/18 40/18
happened [1] 52/14	house [1] 56/6	I shouldn't [1] 34/12	23/1	interviewed [2] 15/3
happening [1] 43/18	how [8] 8/2 8/20	I take [3] 27/20 56/19	included [3] 17/16	16/8
hard [2] 1/15 12/23	12/11 20/7 20/18	60/4	29/15 37/18	interviews [1] 17/23
has [17] 10/4 16/15	21/21 22/13 59/12	I think [12] 4/3 30/19	including [1] 29/10	into [4] 10/17 11/9
16/16 16/24 23/9 29/7	however [1] 46/13	30/25 35/1 35/3 35/24	incompetence [4]	26/10 26/19
34/8 34/16 37/14	human [10] 19/14	49/4 52/22 52/22 55/1	25/23 26/5 26/12 45/4	introduction [1]
40/20 41/19 41/20	19/17 19/18 20/15	57/1 59/17	inconsistencies [2]	55/10
47/8 55/4 57/1 57/21	23/22 24/13 28/10	I thought [1] 31/9	51/22 52/4	investigate [2] 23/12
57/24	32/21 36/8 57/7	I turn [2] 49/22 55/13	indeed [1] 3/3	31/10
have [102]	I	I understand [1]	independent [1]	investigated [1] 24/1
haven't [2] 40/23	I agree [1] 59/7	26/24	46/22	Investigating [5]
59/15	I am [5] 32/18 41/15	I was [10] 3/5 8/24	indicate [5] 6/22	23/11 42/20 42/22
having [15] 14/10	46/5 46/10 54/4	27/6 27/14 27/19 38/9	16/21 17/7 20/11	43/6 43/8
17/13 18/5 19/11	I ask [1] 56/14	50/21 51/15 54/10	25/22	investigation [17]
19/11 21/23 23/23	I asked [1] 23/21	54/17	indicated [3] 20/20	3/12 4/7 5/3 5/12 7/23
24/16 28/8 34/22	I assess [1] 6/8	I wasn't [1] 27/15	39/23 45/3	9/6 14/13 14/19 14/22
37/12 37/21 38/8	I believe [2] 41/22	I will [2] 1/13 46/3	indicative [3] 26/5	15/18 23/24 27/12
46/25 48/21	60/1	I wonder [1] 47/14	27/5 51/1	28/21 35/20 39/24
he [4] 28/23 34/17	I can [3] 8/7 18/22	I worked [1] 4/3	indictment [2] 25/9	40/8 57/5
46/1 57/23	35/11	I would [17] 8/1	25/20	investigations [10]
He's [1] 55/1	I can't [2] 26/24	13/17 23/13 26/7	individual [2] 3/7	3/16 4/14 6/20 14/9
headed [1] 39/22	26/25	29/17 30/16 31/23	10/23	33/15 39/22 40/1 46/8
Headquarters [1]	I considered [1]	32/2 32/11 32/12	infer [1] 58/17	46/10 59/12
40/3	19/17	34/19 39/4 43/7 50/24	influence [2] 18/25	investigator [7]
health [4] 38/11 39/3	I could [1] 23/15	58/7 58/10 59/1	53/14	13/20 15/16 16/19
53/12 56/16	I cut [1] 43/22	I wouldn't [2] 8/8	information [19] 4/21	17/5 31/3 31/9 58/23
hear [3] 1/3 47/24	I did [7] 2/13 17/12	27/14	8/16 8/24 13/1 27/7	Investigators [1]
58/9	17/25 18/19 25/18	I'd [2] 30/21 55/15	34/13 34/15 35/21	14/10
heard [1] 55/4	33/1 53/20	I'll [1] 33/25	36/25 42/2 43/9 43/12	invited [1] 15/23
hearing [1] 60/10	I didn't [5] 13/24 14/8	I'm [13] 13/8 22/13	44/4 44/9 46/15 51/10	involved [10] 3/1 3/5
heart [1] 19/15	18/22 31/25 58/9	34/10 35/17 36/1	52/24 58/23 59/4	3/7 3/10 3/25 8/17
held [2] 39/25 46/7	I do [6] 1/17 1/21 3/1	47/13 48/9 53/16	informed [5] 15/21	42/5 43/10 44/10
Hello [1] 47/24	6/8 18/19 50/14	54/24 54/25 58/9	42/22 46/5 46/11	58/18
help [3] 4/24 18/9	I don't [4] 7/21 7/21	58/20 59/8	51/17	involvement [5] 2/22
26/3	22/8 54/19	I've [3] 18/20 18/21	initial [3] 3/11 3/16	7/9 7/12 38/9 38/18
helpfully [1] 38/20	I done [1] 18/20	25/1	4/7	involving [1] 3/5
helpline [3] 44/8	I expressed [1] 53/12	identified [11] 11/25	inputted [1] 13/1	Ireland [12] 2/7 2/16
44/17 57/8	I feel [1] 7/7	12/8 14/11 14/20 16/3	inputting [1] 26/9	2/20 3/13 6/15 15/4
helps [1] 39/13	I had [4] 17/22 24/7	16/7 16/14 20/1 26/15	inquiry [13] 1/12 1/14	16/9 23/1 25/16 29/7
her [11] 15/5 15/9	27/14 38/8	30/9 36/7	23/4 23/9 23/18 35/1	55/6 59/10
16/11 16/17 19/5 19/7	I have [12] 34/7 34/8	identifying [1] 28/1	38/6 38/25 42/8 47/8	is [126]
39/24 46/20 47/6	41/18 41/21 41/24	ie [1] 9/1	53/6 55/4 57/15	isn't [3] 11/17 18/4
52/18 56/16	42/17 42/19 42/22	ie the [1] 9/1	instance [1] 20/8	27/16
here [16] 9/16 9/19	43/11 46/13 55/12	if [37] 5/10 5/24 6/8	instigated [1] 56/12	issue [1] 32/9
10/12 11/16 12/11	55/17	6/12 18/9 18/21 20/8	instigator [1] 56/19	issued [1] 24/17
13/7 13/19 17/5 25/17	I haven't [1] 59/15	21/8 22/4 23/8 31/17	instructed [1] 50/13	issues [6] 3/5 32/19
26/25 29/14 32/14	I just [1] 34/4	31/24 32/9 34/1 34/4	instructions [3]	38/15 54/4 54/6 56/4
36/4 44/3 46/19 51/16	I know [2] 33/21	34/11 35/11 35/21	28/24 30/11 31/11	it [101]
hereby [1] 39/16	44/13	39/12 42/3 47/7 47/14	Insurance [1] 9/25	it's [12] 5/16 18/9
herewith [1] 40/19	I may [3] 34/1 34/21	47/17 48/7 48/9 48/11	intend [1] 50/15	18/10 21/2 23/16 25/6
herself [2] 16/24	48/24	48/18 48/24 50/14	intended [1] 52/23	35/15 48/15 50/4 56/9
17/10	I mean [3] 34/2 34/12	51/7 51/9 52/3 54/4	inter [1] 29/1	56/9 57/21
hidden [1] 20/12	35/16	54/6 58/7 58/10 59/2	inter alia [1] 29/1	item [1] 46/16
hide [1] 34/12	I never [1] 31/8	ignore [1] 27/10	interest [6] 6/4 6/4	items [1] 37/19
highlighted [2] 12/15	I raised [1] 45/7	ii [3] 6/3 29/2 36/9	38/10 53/4 53/17	its [1] 1/13
14/2	I read [1] 49/20	iii [1] 36/10	59/21	itself [2] 26/10 35/18
him [1] 37/4	I recall [1] 34/9	ill [2] 38/11 39/3	internal [1] 49/4	iv [1] 36/12
his [2] 37/5 53/12	I refer [1] 46/2	ill health [2] 38/11	interpreted [1] 19/12	
hm [1] 49/9	I rely [1] 8/5	39/3	interrupt [1] 35/22	J
Horizon [12] 3/2 8/11	I represent [1] 57/3	immediate [1] 40/9	interview [14] 15/19	Jacobs [3] 57/1 57/2
8/13 8/16 32/9 32/17	I resume [1] 48/1	important [2] 33/11	15/20 16/6 17/18 18/2	61/9
32/24 36/18 36/21	I said [1] 18/12	56/11	18/11 18/12 18/17	January [3] 1/1 1/16
		impression [1] 55/16	19/11 22/6 26/9 26/16	6/15

J	letters [2] 29/3 29/12 level [1] 32/23 liable [2] 16/24 17/10 liaise [1] 41/5 liaising [1] 52/18 lifetime [1] 38/16 light [3] 50/16 53/5 58/4 like [7] 3/15 18/16 34/19 39/4 43/7 52/17 55/15 likewise [1] 5/9 limb [1] 53/4 Limited [7] 6/20 9/9 14/13 14/18 21/13 25/15 40/1 line [3] 12/11 23/8 23/11 lines [2] 23/3 23/18 Lisahally [15] 11/5 14/16 14/20 20/23 22/1 27/7 27/18 28/4 40/9 40/11 42/24 46/6 51/21 51/24 52/6 list [2] 34/15 37/18 listed [3] 33/5 37/5 53/25 listing [1] 10/20 lists [2] 9/3 10/22 little [3] 9/5 48/12 55/16 Local [1] 14/18 location [2] 43/25 44/1 locations [2] 55/25 56/5 log [2] 37/20 57/9 logs [9] 41/24 42/2 43/8 44/8 44/17 45/19 46/9 46/19 47/7 Londonderry [1] 11/6 look [3] 30/4 32/20 34/10 looked [5] 34/4 34/22 44/5 48/21 52/17 looking [3] 34/9 37/22 48/9 loop [1] 52/19 loose [1] 55/19 loss [4] 21/22 21/23 22/14 22/23 losses [2] 22/2 22/3 Lottery [1] 41/21 lower [1] 22/11	28/18 36/23 38/1 38/19 39/19 51/6 57/4 57/16 57/22 58/5 58/7 make [3] 27/4 32/22 58/10 makes [1] 7/6 making [2] 26/19 59/20 Manager [4] 6/20 9/6 40/4 44/2 many [5] 10/14 19/19 24/13 26/11 27/10 March [3] 24/22 25/5 42/1 mark [1] 36/17 match [1] 13/3 matched [2] 13/4 20/10 material [18] 17/16 31/20 32/3 32/10 32/16 34/8 35/3 37/5 37/14 46/23 47/2 47/4 47/4 48/4 48/18 49/3 52/15 53/22 materials [1] 53/7 matter [11] 6/14 16/16 23/16 36/16 39/15 39/17 42/19 42/23 51/25 53/25 59/21 matters [5] 46/3 51/2 56/4 57/14 59/12 Maureen [11] 2/23 3/6 3/25 5/15 9/10 16/24 21/11 25/9 37/9 42/16 57/3 may [18] 1/5 16/1 16/8 19/15 26/18 30/19 33/4 34/1 34/21 36/6 37/13 41/22 45/18 45/20 48/24 54/21 58/5 58/24 McAuley [2] 6/17 7/3 McCleery [1] 44/2 McKelvey [46] 2/23 5/15 6/23 9/10 13/25 15/2 15/7 15/20 15/23 16/1 16/6 16/8 16/13 16/15 16/22 16/24 17/9 17/23 18/17 19/4 19/4 21/11 24/11 25/9 26/8 26/13 26/17 26/21 27/8 32/24 33/4 38/11 40/4 40/15 41/1 41/20 42/16 44/19 44/25 50/13 51/18 52/8 53/6 57/3 57/16 57/21 McKelvey's [19] 3/2 3/6 3/25 15/10 18/1 37/9 39/3 39/10 45/22 45/25 46/16 46/18 50/3 50/6 50/18 52/21 53/11 54/23 56/15	McKenny [2] 14/23 14/25 McMahon [2] 40/8 41/19 McNally [1] 42/15 me [13] 5/18 15/17 21/25 28/2 32/9 35/7 43/22 50/11 53/8 53/9 53/14 53/22 55/4 mean [5] 18/22 19/6 34/2 34/12 35/16 medical [1] 53/6 meet [1] 22/23 meeting [1] 51/8 member [1] 14/24 members [2] 9/17 28/4 memo [3] 42/13 43/15 44/4 memory [7] 20/3 23/20 26/7 34/21 48/8 49/11 54/17 mention [2] 21/20 33/5 mentioned [2] 18/4 28/2 met [15] 5/23 17/15 20/2 24/9 24/17 26/1 28/15 32/13 44/13 45/14 45/17 50/19 53/5 53/19 57/11 might [11] 18/3 19/14 20/14 27/5 32/16 37/15 47/14 55/24 57/10 59/3 59/11 mind [2] 13/6 49/11 mine [1] 35/4 mismatch [3] 12/17 13/11 14/5 missing [1] 5/11 Mm [1] 49/9 Mm-hm [1] 49/9 moment [5] 32/21 47/14 48/9 48/25 55/17 money [4] 14/1 20/6 20/12 24/12 monies [1] 9/9 more [8] 9/6 24/4 25/22 26/14 35/21 45/3 49/2 59/15 morning [6] 1/3 28/9 41/14 47/15 57/5 57/15 Mr [34] 1/5 1/10 2/3 2/4 2/24 5/16 29/13 32/5 34/2 34/14 38/5 40/23 41/4 46/20 48/7 48/22 49/4 49/7 49/10 50/2 51/21 51/24 52/7 52/25 55/4 55/16 57/1 57/2 57/3 58/14 59/18 59/20 60/6 61/9 Mr Curran [1] 41/4	Mr Dale's [1] 46/20 Mr Groogan [2] 51/21 51/24 Mr Groogan's [1] 52/7 Mr Jacobs [3] 57/1 57/2 61/9 Mr Shiels [16] 1/5 1/10 2/4 34/2 34/14 40/23 48/7 49/4 49/10 50/2 55/4 55/16 57/3 58/14 59/18 59/20 Mr Shiels' [9] 2/3 2/24 5/16 29/13 32/5 38/5 48/22 49/7 52/25 Mr Ward [1] 60/6 Mrs [44] 3/2 9/10 17/9 17/23 18/1 18/17 19/4 19/4 20/22 24/11 26/8 26/13 26/17 26/21 27/8 32/24 33/4 38/11 39/3 39/10 40/4 40/15 41/1 44/19 44/25 45/22 45/25 46/16 46/18 50/3 50/6 50/13 50/18 51/18 52/8 52/17 52/20 52/21 53/6 53/11 54/23 56/15 57/16 57/21 Mrs Maureen [1] 9/10 Mrs McKelvey [25] 17/9 17/23 18/17 19/4 19/4 24/11 26/8 26/13 26/17 26/21 27/8 32/24 33/4 38/11 40/4 40/15 41/1 44/19 44/25 50/13 51/18 52/8 53/6 57/16 57/21 Mrs McKelvey's [15] 3/2 18/1 39/3 39/10 45/22 45/25 46/16 46/18 50/3 50/6 50/18 52/21 53/11 54/23 56/15 Mrs Winter [1] 20/22 Mrs Winters [2] 52/17 52/20 MS [38] 1/8 9/7 9/15 13/25 15/10 17/9 17/11 17/16 17/19 18/5 19/22 20/19 20/24 21/1 21/8 21/15 21/23 21/24 23/17 23/23 27/13 28/8 31/6 33/21 39/23 41/13 44/5 44/8 44/12 47/6 49/24 50/19 51/8 51/14 55/5 57/25 60/5 61/5 Ms McKelvey [1] 13/25 Ms McKelvey's [1]
----------	--	---	--	---

M	6/15 15/4 16/9 23/1 25/16 29/7 55/6 59/10 not [57] 3/1 3/24 4/16 4/19 4/23 5/5 6/23 8/23 15/7 15/11 16/21 17/8 17/12 19/17 23/9 23/18 24/14 26/22 28/10 30/20 31/17 33/1 33/4 34/17 35/5 35/13 35/15 35/23 36/21 37/14 39/7 42/7 44/9 45/1 46/10 50/10 50/15 50/17 50/21 51/15 51/20 52/12 53/16 53/20 53/21 54/3 54/4 54/10 54/13 54/13 54/18 54/24 55/1 56/9 56/9 57/9 58/24 note [3] 44/5 53/7 53/9 nothing [3] 32/7 44/16 53/13 now [7] 17/17 20/17 26/25 29/7 34/9 37/23 58/2 number [9] 9/23 9/25 9/25 13/4 26/3 27/4 28/2 51/22 57/22 numbers [3] 10/24 15/5 16/10	officers [1] 22/1 offices [2] 10/14 40/5 Okay [1] 22/22 Omagh [10] 29/6 38/13 40/2 40/5 42/14 50/8 52/21 53/3 54/7 55/25 on [135] once [4] 4/24 5/9 7/23 56/12 one [15] 3/19 4/20 20/8 39/20 49/2 51/17 55/2 55/15 55/18 55/24 55/25 56/1 57/23 58/17 59/8 ones [1] 48/9 only [16] 3/4 3/6 3/10 6/23 8/10 10/3 16/22 20/22 26/7 42/2 43/9 44/9 46/7 52/20 52/22 59/3 onto [2] 10/22 11/14 onward [1] 43/12 onwards [1] 59/23 Operating [1] 36/10 opportunity [1] 16/23 opportunity' [1] 6/24 opposed [1] 3/12 or [60] 3/3 3/8 4/12 4/18 5/11 7/25 9/21 9/25 10/3 10/16 13/4 13/14 14/2 15/7 17/19 19/14 20/12 20/15 22/2 22/8 22/15 23/4 23/9 23/11 23/13 23/14 23/19 24/14 25/14 28/10 30/13 30/24 31/17 31/21 32/8 32/24 34/17 38/1 43/24 46/23 47/3 49/16 50/9 50/23 52/6 52/15 52/20 54/5 54/16 55/2 55/23 56/6 57/7 57/20 58/11 58/11 58/21 58/25 59/22 59/25 order [18] 9/22 9/22 10/2 10/5 10/8 10/18 11/5 11/16 11/20 12/9 12/15 14/11 15/4 16/10 39/21 40/2 41/7 46/3 organisation [1] 58/22 original [2] 42/18 53/14 originally [1] 52/1 other [15] 3/15 3/19 3/23 19/13 20/16 23/22 38/2 38/15 44/17 52/3 55/2 56/1 56/4 56/5 59/8 others [2] 4/6 29/9 otherwise [2] 24/7	54/5 out [18] 4/14 5/22 9/16 9/17 15/1 27/12 28/16 31/20 33/13 37/18 38/20 40/20 46/4 51/6 52/19 52/22 58/8 58/11 outcome [4] 54/11 57/25 58/2 58/13 outstanding [3] 15/24 17/4 21/6 over [14] 7/5 9/2 9/6 18/3 20/10 30/10 31/22 36/3 36/17 48/15 48/17 49/24 50/14 51/11 overall [1] 22/11 overclaim [3] 13/12 20/7 20/8 overclaiming [3] 19/9 23/22 26/23 overclaims [18] 11/25 12/2 12/5 12/12 12/12 13/7 14/19 15/23 16/3 16/7 16/14 19/23 19/24 20/1 20/5 20/5 20/10 22/16 oversee [1] 7/17 own [2] 8/5 56/2 owners [3] 42/4 43/10 44/10 ownership [1] 7/23	page 8 [2] 21/2 52/25 page 9 [1] 1/18 pages [2] 9/7 48/17 paid [16] 10/8 10/13 10/15 10/17 11/3 11/5 11/16 11/20 11/24 12/8 12/15 13/4 14/11 14/15 39/21 40/2 papers [8] 17/1 24/19 24/22 28/20 29/4 31/13 47/9 52/14 paragraph [20] 2/24 2/25 5/16 5/17 6/11 9/19 11/19 11/21 17/13 24/16 29/13 32/4 32/5 33/8 34/2 36/6 39/12 41/6 50/1 53/23 paragraph 10 [2] 17/13 24/16 paragraph 13 [2] 29/13 34/2 paragraph 14 [2] 32/4 32/5 paragraph 17 [1] 33/8 paragraph 25 [1] 39/12 paragraph 31 [1] 50/1 paragraph 36 [1] 53/23 paragraph 4 [1] 36/6 paragraph 5 [2] 2/24 2/25 paragraph 8 [1] 6/11 paragraph 9 [2] 5/16 5/17 paragraphs [8] 33/13 36/2 38/6 38/7 38/21 53/1 59/22 59/23 paragraphs 18 [1] 36/2 paragraphs 23 [2] 38/6 38/7 paragraphs 25 [1] 59/23 paragraphs 34 [1] 53/1 part [13] 12/22 12/23 13/13 13/14 19/5 19/7 28/22 29/1 29/2 29/8 33/11 56/14 59/22 Participants [1] 55/13 particular [2] 24/10 38/12 passing [1] 53/7 pattern [1] 14/20 Paul [1] 45/24 Pausing [1] 12/4 paying [1] 9/16 payment [6] 9/22 9/24 9/24 10/3 10/4
N	name [2] 1/9 1/15 namely [1] 23/22 National [1] 9/25 nature [2] 9/3 50/23 necessary [1] 55/19 need [1] 47/7 needed [1] 15/21 never [3] 20/10 31/8 50/11 new [2] 42/1 44/18 next [5] 11/13 11/19 15/17 18/18 51/11 nil [1] 29/19 no [76] no 3 [1] 43/7 non [17] 12/3 12/5 12/13 13/8 13/22 25/10 29/16 29/21 32/7 33/23 34/3 34/7 34/24 35/2 48/4 48/18 49/3 non-existent [5] 12/3 12/5 12/13 13/8 13/22 non-scheduled [1] 25/10 non-sensitive [11] 29/16 29/21 32/7 33/23 34/3 34/7 34/24 35/2 48/4 48/18 49/3 normally [2] 9/22 54/6 Northern [13] 2/7 2/16 2/20 3/12 4/4	O objective [1] 58/25 obligation [1] 34/16 obligations [1] 33/13 obliged [1] 51/9 observations [2] 15/16 16/18 observe [2] 15/24 16/1 obtained [3] 47/10 47/11 47/13 obviously [1] 22/10 occasion [1] 58/1 occasions [2] 28/3 51/17 off [1] 48/7 offence [3] 9/4 24/10 25/10 offer [2] 15/7 54/18 offered [1] 16/13 office [83] officer [25] 9/5 23/11 28/22 29/4 29/11 29/20 30/1 30/8 30/8 30/13 30/14 30/15 30/17 30/20 31/3 33/17 35/11 41/4 42/20 42/23 43/6 43/8 48/19 49/15 49/17 Officer' [1] 5/19 Officer's [2] 33/9 33/11	P P McAuley [1] 7/3 P2311 [5] 10/23 11/4 11/14 12/18 12/21 P2311MA [1] 10/25 PACE24 [1] 40/19 page [42] 1/18 2/25 5/16 6/12 9/2 9/8 9/14 9/16 9/19 15/15 15/19 18/10 18/11 18/14 18/15 18/18 21/2 21/4 21/9 25/1 25/3 28/14 28/14 29/14 30/5 30/10 32/5 35/2 36/3 38/5 38/6 39/9 42/12 43/18 44/6 49/2 49/3 49/4 50/4 50/14 51/11 52/25 page 11 [1] 21/9 page 14 [2] 35/2 49/4 page 16 [1] 49/3 page 2 [2] 2/25 42/12 page 3 [3] 5/16 39/9 50/4 page 4 [6] 25/1 25/3 28/14 28/14 29/14 32/5 page 5 [1] 30/5 page 6 [3] 9/14 38/5 38/6 page 76 [1] 18/10	

P	59/8 payment... [1] 10/4 payments [2] 11/1 22/16 pension [20] 6/22 9/21 9/24 10/15 11/1 11/4 11/24 12/3 12/6 12/13 13/8 13/22 14/15 15/22 16/2 16/4 16/6 16/20 17/7 20/20 pensions [8] 9/17 10/11 10/13 10/24 15/24 21/19 51/20 52/9 penultimate [1] 9/19 people [3] 8/25 27/6 55/24 perhaps [4] 47/17 48/24 57/12 59/2 period [2] 7/5 46/20 periods [1] 37/21 person [8] 6/23 13/13 16/22 34/16 35/5 48/16 55/21 56/21 personal [1] 14/2 personally [2] 31/18 39/7 PHILIP [3] 1/7 1/11 61/3 phrase [1] 35/12 physical [7] 11/8 11/15 12/17 13/14 14/6 18/13 22/19 place [1] 26/18 placed [1] 33/12 pleaded [1] 33/4 please [55] 1/5 1/9 1/18 2/4 2/24 5/15 6/12 6/13 7/1 9/2 9/5 9/7 9/14 18/10 18/10 18/18 21/2 21/3 24/25 25/1 25/2 25/5 25/7 29/13 30/4 30/6 30/10 32/4 36/4 37/8 37/11 38/5 39/4 39/8 39/9 39/14 40/18 41/2 41/11 42/11 42/12 42/15 43/5 45/23 45/23 47/18 48/17 48/19 49/5 50/4 50/5 50/14 51/7 52/25 58/9 pm [1] 60/9 PNI00000001 [14] 7/1 18/9 21/2 24/25 25/3 30/5 37/8 39/8 41/3 41/11 42/11 45/23 48/11 50/4 point [18] 2/11 3/25 4/20 14/4 15/18 17/20 18/1 20/1 22/9 22/10 23/25 31/11 32/3 34/12 51/16 52/8 55/5	59/8 pointing [1] 23/4 police [26] 3/12 3/24 5/7 6/15 7/21 7/24 7/25 8/2 8/6 8/8 15/3 16/9 27/21 28/21 28/22 29/5 29/6 29/17 29/22 30/14 30/24 32/23 48/17 51/1 52/19 55/6 police's [1] 7/19 position [3] 15/10 27/4 56/8 possession [2] 37/6 46/10 possibilities [2] 24/1 28/10 possibility [1] 57/6 possible [6] 13/16 19/13 31/18 36/6 45/6 59/17 possibly [3] 59/14 59/14 59/18 post [80] post-dated [1] 26/16 post-decision [1] 56/3 postmaster [2] 41/25 42/1 POU [2] 14/16 14/20 pouches [5] 14/15 15/25 16/2 16/5 21/19 PPS [15] 5/20 5/21 5/23 33/13 33/14 42/17 42/19 43/13 43/19 52/15 54/16 54/17 54/19 58/5 58/18 PPSSNI [1] 36/5 practice [3] 2/9 15/4 16/10 practices [1] 27/2 preparation [1] 24/18 prepare [2] 10/15 24/19 prepared [5] 6/19 9/3 10/16 30/23 30/25 preparing [2] 34/22 47/1 presence [2] 15/5 16/11 present [5] 5/8 7/18 41/25 46/9 49/19 presentations [1] 4/12 presented [2] 5/25 10/5 Pressure [1] 36/9 presumably [1] 40/21 previous [1] 44/6 previously [2] 37/14 40/21 PRICE [6] 1/8 33/21	49/24 57/25 60/5 61/5 primary [10] 28/18 29/15 31/14 31/19 31/23 32/2 32/11 33/23 36/19 48/13 printed [1] 9/24 printout [1] 46/13 prior [3] 3/2 5/5 8/11 private [1] 2/9 probably [1] 7/14 probe [1] 17/10 problems [8] 40/5 40/14 44/19 44/24 46/17 52/9 52/10 53/12 Procedure [1] 33/15 procedures [1] 51/3 proceed [1] 7/7 proceedings [7] 21/10 28/21 29/3 29/8 29/12 30/5 30/7 process [3] 3/21 3/22 6/5 processes [1] 57/13 produce [1] 10/20 produced [6] 4/15 4/25 44/9 45/19 52/5 59/22 professional [2] 2/4 2/5 progress [2] 28/16 29/9 prompted [1] 52/1 pronounced [1] 19/20 property [1] 21/13 proposed [1] 22/12 prosecute [10] 6/9 8/21 17/2 17/21 18/7 19/1 25/9 53/15 55/18 55/22 prosecuted [2] 3/8 59/9 prosecution [44] 2/15 2/20 2/23 3/4 4/12 5/2 5/8 5/22 5/22 6/3 6/7 6/18 7/8 7/11 16/25 17/10 17/15 20/2 22/24 23/3 24/17 25/20 25/25 26/20 28/15 28/18 31/14 32/13 33/18 36/20 37/14 38/10 39/2 44/13 45/14 45/17 53/5 54/19 55/9 56/12 56/16 56/20 57/11 58/24 prosecutions [11] 2/12 3/1 3/4 3/17 4/2 4/11 4/15 5/1 5/6 5/10 50/7 prosecutor [7] 2/12 2/14 2/18 23/7 48/21 56/11 59/11	prosecutors [10] 4/4 4/18 5/23 33/14 38/14 51/1 54/7 56/2 56/6 56/7 prospect [1] 6/1 prospective [1] 4/15 provide [7] 6/1 29/10 35/21 36/12 51/9 51/23 52/5 provided [13] 17/18 25/25 29/17 29/22 30/22 31/22 31/23 38/25 44/12 45/21 48/6 58/24 59/5 providing [3] 27/6 34/13 34/15 précis [4] 9/15 18/4 21/4 21/15 PSNI [4] 7/9 9/3 28/24 54/16 public [23] 2/12 2/12 2/14 2/15 2/18 2/19 3/17 4/2 4/4 4/11 4/11 5/1 5/2 5/6 5/10 6/3 6/4 9/17 38/10 38/14 50/7 53/4 53/17 Public Prosecutor [2] 2/12 2/14 publicly [1] 33/22 purporting [1] 49/18 purposeful [1] 13/12 purposes [3] 2/2 10/10 47/1 pursue [2] 23/3 23/11 pursued [2] 23/9 23/19 pursuing [1] 23/13 put [8] 13/19 26/6 26/17 32/16 39/13 45/4 56/21 57/21 putting [2] 12/22 22/8	R raise [2] 46/3 59/8 raised [7] 18/2 32/19 32/22 36/22 39/3 45/7 52/11 ran [1] 54/2 range [1] 45/20 rather [3] 19/9 26/5 26/23 re [1] 42/16 reach [2] 13/24 17/11 reached [3] 13/19 15/18 22/14 reaching [1] 5/5 read [10] 12/4 13/18 17/24 18/5 19/11 21/23 23/17 23/23 49/20 52/22 reading [1] 19/4 reads [1] 42/14 real [2] 30/16 30/20 reason [5] 15/7 17/5 17/8 24/4 24/7 reasonable [4] 6/1 23/3 23/8 23/18 reasonably [1] 37/15 reasoning [2] 25/24 28/15 reassess [1] 45/13 recall [7] 3/1 17/17 22/8 26/24 26/25 34/9 55/9 receipt [3] 29/18 33/19 37/3 receive [3] 8/12 9/22 14/14 received [12] 6/5 6/10 6/14 8/3 27/20 32/24 36/5 37/12 46/12 46/23 47/3 47/5 recognising [1] 39/6 recollection [2] 29/17 46/22 recommendations [4] 8/6 8/7 8/9 21/9 reconciled [1] 51/21 reconciliation [1] 51/19 reconciling [1] 52/9 reconstituted [1] 2/15 recorded [2] 17/18 22/20 records [4] 17/18 39/25 40/13 46/17 redacted [4] 34/8 34/10 35/3 49/6 redaction [1] 48/22 Ref [2] 41/17 41/24 refer [8] 37/11 37/13 39/12 39/15 46/1 46/2 50/1 55/19 reference [10] 2/2
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R	28/8 28/9 29/5 40/3 40/10 42/20 43/5 51/20 51/20 52/10 53/6 53/13 57/6 reported [4] 32/25 44/25 52/10 54/11 reporting [1] 40/13 reports [5] 41/19 44/20 51/22 52/2 52/5 represent [1] 57/3 representative [1] 31/17 request [10] 38/3 40/7 40/20 41/7 41/18 42/25 52/7 52/14 52/16 52/16 requested [6] 38/9 41/24 46/11 46/16 46/21 51/18 requests [8] 38/19 39/6 39/19 43/3 48/2 51/6 51/12 55/20 required [4] 6/3 37/13 42/4 55/6 requirement [2] 23/2 55/10 requiring [1] 5/8 research [1] 49/23 respect [4] 4/13 6/6 52/14 53/10 respective [1] 10/17 response [1] 37/17 responsibility [1] 5/20 result [2] 14/25 21/17 resulted [1] 11/9 resume [2] 48/1 60/4 retained [3] 10/9 39/16 43/11 return [2] 29/19 31/12 returned [1] 54/3 returns [1] 42/6 revealed [1] 14/19 review [23] 33/17 37/4 38/10 38/24 39/2 44/11 52/13 53/18 53/18 53/22 54/15 54/17 54/20 54/22 57/25 58/6 58/8 58/11 58/17 58/18 58/20 59/2 59/10 reviewed [6] 7/14 32/12 46/12 46/24 46/25 47/3 right [29] 2/7 2/16 2/17 2/18 18/21 24/20 24/23 26/1 27/24 28/1 28/7 29/23 30/11 33/6 33/20 35/5 35/8 35/9 37/1 37/6 38/18 42/9 43/1 43/16 43/17 55/22 56/12 56/24 60/4	rise [2] 39/24 40/7 risk [1] 58/23 role [4] 5/19 31/7 33/9 33/11 roll [1] 2/6 rota [1] 11/21 routine [1] 11/23 run [1] 7/14 running [1] 36/9	secondary [7] 33/19 35/25 36/2 38/8 39/17 39/19 55/20 Section [3] 5/23 25/15 33/15 Section 1 [1] 25/15 Section 4 [1] 5/23 Section 7A [1] 33/15 Security [3] 3/20 14/24 40/1 see [20] 1/3 9/2 9/4 21/8 25/3 25/5 25/17 30/10 34/11 35/21 39/14 41/12 41/22 42/15 43/5 43/18 45/24 47/24 49/6 50/14 seek [2] 39/16 40/9 seems [2] 21/18 55/22 seen [6] 37/21 40/22 42/7 44/14 44/15 50/17 send [1] 59/25 sending [1] 31/20 senior [7] 2/12 2/14 2/18 4/4 28/25 31/13 38/14 sense [1] 5/5 sensitive [15] 29/16 29/18 29/21 32/7 32/8 33/23 34/3 34/7 34/23 34/24 35/2 48/3 48/4 48/18 49/3 sent [17] 4/25 7/24 11/15 29/1 29/7 30/8 37/3 37/7 43/16 43/23 50/6 52/15 52/17 52/20 52/23 59/25 60/1 sentence [2] 12/4 21/4 September [10] 25/12 38/11 39/3 42/1 45/20 53/2 53/10 54/1 54/2 57/17 Service [8] 2/16 2/20 3/12 4/12 5/2 6/15 29/6 55/6 set [9] 5/22 27/12 28/15 33/13 37/18 38/20 46/4 51/6 51/12 sets [1] 9/16 sham [1] 57/24 she [17] 15/8 15/11 15/12 16/16 17/6 18/2 19/6 24/12 26/9 30/17 30/18 31/9 31/10 32/25 34/17 42/6 42/6 sheet [1] 9/3 Shiels [19] 1/5 1/7 1/10 1/11 2/4 34/2 34/14 40/23 48/7 49/4 49/10 50/2 55/4 55/16	57/3 58/14 59/18 59/20 61/3 Shiels' [9] 2/3 2/24 5/16 29/13 32/5 38/5 48/22 49/7 52/25 shop [1] 36/9 short [4] 25/21 26/4 45/3 47/22 shortage [4] 15/1 21/18 22/7 22/18 shortfall [2] 22/9 22/10 shortfalls [2] 22/15 36/7 should [11] 1/14 13/3 20/6 24/1 28/23 31/16 33/2 35/12 45/10 56/16 59/5 shouldn't [1] 34/12 showed [2] 44/18 44/24 sign [1] 34/20 signature [16] 1/20 1/22 34/9 34/11 35/2 35/3 35/17 48/14 48/20 48/20 48/22 49/6 49/7 49/7 49/8 49/17 signed [8] 24/22 31/12 33/24 35/12 35/13 48/7 48/21 49/15 significantly [1] 22/11 signs [1] 34/16 similar [1] 14/19 simple [3] 25/22 26/5 45/3 simply [3] 13/24 26/12 31/21 sir [19] 1/3 33/25 34/9 34/11 35/10 35/17 35/20 35/23 47/18 47/24 48/1 48/24 49/21 49/25 55/12 55/14 57/1 60/6 61/7 site [2] 40/7 56/7 sitting [1] 26/25 situated [2] 38/13 54/7 situation [1] 14/14 slowly [1] 51/10 so [45] 5/7 5/8 12/11 12/15 13/6 14/1 15/10 15/19 18/10 18/24 19/6 19/20 20/7 20/11 22/5 22/12 22/18 25/3 26/21 29/9 29/21 30/6 33/22 34/19 35/11 36/3 36/21 38/18 38/24 41/17 42/25 43/3 43/14 44/2 44/7 48/10 48/11 49/10
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S	42/3 42/7 42/8 46/1 46/22 47/1 47/7 47/10 47/11 47/13 50/1 53/1 53/23 55/7 59/1	surprising [1] 27/9 suspect [1] 23/5 suspension [3] 40/15 46/19 46/20 Suzanne [17] 6/19 9/5 14/21 18/15 30/9 30/12 30/16 30/21 30/23 30/25 39/22 41/5 41/9 41/12 42/20 43/14 50/13 sworn [2] 1/7 61/3 sympathy [1] 53/12 system [19] 8/13 8/16 8/25 11/9 13/2 13/15 14/2 32/9 32/24 32/25 36/18 36/21 36/24 40/16 42/5 43/10 44/10 44/19 44/25	11/16 15/14 16/11 18/22 22/5 24/21 24/24 25/3 26/2 27/25 28/6 29/14 34/5 34/18 35/8 35/14 37/2 38/6 38/23 41/3 42/10 43/2 43/17 43/23 57/14 theft [11] 7/4 7/8 9/4 9/9 19/13 21/14 22/12 24/9 24/15 25/15 26/5 Theft Act [1] 21/14 thefts [1] 7/6 their [3] 10/17 20/23 56/2 them [15] 17/24 23/13 23/15 23/16 28/1 28/23 33/22 40/22 48/7 48/10 52/23 59/25 59/25 60/1 60/3 then [28] 5/14 5/20 7/14 7/15 9/13 10/11 10/18 11/1 11/11 11/13 11/19 15/15 16/18 21/18 22/18 24/22 25/19 30/9 36/14 37/16 40/12 40/25 41/9 42/6 43/3 51/10 56/20 60/2 there [76] there's [11] 8/8 17/15 18/13 18/21 21/20 23/14 44/16 47/4 47/13 49/6 58/23 thereabouts [1] 25/14 therefore [2] 30/12 40/9 these [16] 3/5 7/6 8/4 14/4 17/1 17/10 26/17 26/20 29/10 38/21 39/7 40/22 42/2 45/10 45/21 46/21 they [30] 2/1 3/24 4/14 4/14 7/15 7/16 19/19 20/15 22/2 22/2 23/15 30/25 34/25 37/24 45/1 45/5 45/6 45/8 45/9 45/13 46/11 48/6 48/8 52/12 52/22 52/23 52/24 56/16 56/18 59/18 thing [1] 26/7 things [3] 55/24 57/23 59/17 think [23] 4/3 20/4 22/4 22/22 27/3 30/19 30/25 33/2 35/1 35/3 35/24 45/10 49/4 50/25 52/22 52/22 54/20 55/1 57/1 58/21 59/2 59/11 59/17 third [3] 40/12 41/5 45/6	thirds [1] 9/12 this [114] thorough [1] 60/3 Thorpe [1] 14/21 those [20] 3/19 8/25 13/16 14/6 14/20 15/5 22/20 24/1 30/23 33/13 37/21 37/23 54/7 55/12 55/24 56/2 56/5 56/6 58/7 58/10 thought [4] 31/8 31/9 55/19 56/20 three [1] 17/22 through [9] 3/24 5/6 17/24 18/5 28/8 32/23 36/10 41/21 50/15 throughout [1] 33/18 thrown [1] 59/4 Thursday [1] 14/23 time [30] 4/6 7/5 7/19 12/21 17/11 20/17 20/18 22/9 22/22 25/21 26/4 27/9 29/4 29/19 29/25 31/12 32/2 37/10 37/21 38/14 44/22 45/3 45/11 50/17 50/18 51/5 52/11 54/12 55/5 55/23 titled [1] 37/23 today [2] 1/12 26/25 told [5] 33/22 57/15 57/18 57/19 58/13 tomorrow [1] 60/4 too [2] 24/13 27/10 took [4] 8/21 17/24 18/6 26/18 top [3] 15/15 15/19 18/18 torn [1] 10/7 total [4] 10/19 10/25 11/10 11/11 totality [1] 21/24 totalled [1] 22/2 totalling [2] 22/15 22/16 totals [4] 10/21 10/21 10/23 11/13 towards [8] 6/12 9/18 18/1 18/11 18/12 18/14 21/3 23/4 trail [1] 55/23 training [3] 2/5 8/12 32/23 transaction [1] 37/20 transcript [4] 2/2 17/22 19/11 19/21 transcripts [1] 18/6 transmission [1] 43/12 trial [9] 24/19 31/16 53/24 53/25 54/1 54/4 54/9 54/11 57/22 trials [1] 56/5
	42/3 42/7 42/8 46/1 46/22 47/1 47/7 47/10 47/11 47/13 50/1 53/1 53/23 55/7 59/1 statements [6] 8/25 27/17 27/22 28/4 42/23 46/6 states [2] 16/16 43/8 stating [1] 6/17 stealing [1] 13/25 step [1] 11/13 Stephen [3] 15/6 16/11 53/11 steps [4] 8/19 23/24 28/16 56/11 still [6] 30/13 44/13 45/14 47/24 53/5 56/8 stole [2] 21/12 25/13 stolen [2] 21/8 24/12 stop [1] 12/6 stopped [1] 13/9 store [1] 22/8 stubs [1] 13/5 Sub [1] 40/4 subject [1] 9/8 submission [1] 7/10 submitted [3] 7/13 9/13 43/12 subpostmaster [1] 9/10 subpostmasters [1] 59/9 subsequent [2] 3/3 40/8 such [5] 5/13 17/1 32/10 47/9 54/6 sufficiency [1] 8/3 sufficient [6] 6/1 6/9 6/18 7/7 22/22 36/13 sufficiently [3] 28/10 31/10 57/6 suggested [1] 46/21 suggesting [1] 36/17 suggestion [1] 52/8 suitably [1] 31/6 sum [2] 10/8 25/14 summaries [1] 10/16 summarised [5] 6/21 10/14 10/24 16/20 17/6 summary [18] 9/2 10/15 10/21 10/25 11/7 11/11 11/16 12/16 12/20 12/25 13/10 15/10 17/20 21/17 21/20 23/24 38/20 38/24 Superintendent [3] 6/17 7/2 7/3 supplied [3] 8/24 42/17 46/13 support [2] 4/15 17/1 supported [1] 20/24 sure [1] 34/10	T Table [1] 11/2 take [9] 6/6 8/19 26/19 27/20 39/4 48/14 50/15 56/19 60/4 taken [2] 23/24 55/21 taking [1] 17/20 tape [4] 15/4 16/10 17/18 40/18 taped [1] 17/22 team [8] 4/1 4/17 14/13 14/19 14/22 14/24 55/18 56/2 technical [2] 51/2 57/14 telephone [1] 53/10 telling [2] 28/2 35/7 Temp [1] 41/25 terminology [1] 19/24 terms [9] 6/10 8/4 13/19 14/2 20/5 20/25 30/16 30/20 32/19 test [18] 5/21 5/22 6/2 6/4 17/15 20/2 22/24 24/8 24/17 26/1 28/15 32/12 44/13 45/14 45/17 53/4 53/19 57/11 than [8] 19/9 19/13 22/11 23/22 25/22 26/5 26/23 45/3 thank [16] 1/4 1/12 19/21 28/7 35/22 47/20 47/25 48/1 49/23 49/25 56/24 59/15 59/20 60/2 60/7 60/8 Thanks [2] 34/20 49/23 that [265] that's [32] 2/8 2/10 2/17 2/17 2/21 3/9 8/7	11/16 15/14 16/11 18/22 22/5 24/21 24/24 25/3 26/2 27/25 28/6 29/14 34/5 34/18 35/8 35/14 37/2 38/6 38/23 41/3 42/10 43/2 43/17 43/23 57/14 theft [11] 7/4 7/8 9/4 9/9 19/13 21/14 22/12 24/9 24/15 25/15 26/5 Theft Act [1] 21/14 thefts [1] 7/6 their [3] 10/17 20/23 56/2 them [15] 17/24 23/13 23/15 23/16 28/1 28/23 33/22 40/22 48/7 48/10 52/23 59/25 59/25 60/1 60/3 then [28] 5/14 5/20 7/14 7/15 9/13 10/11 10/18 11/1 11/11 11/13 11/19 15/15 16/18 21/18 22/18 24/22 25/19 30/9 36/14 37/16 40/12 40/25 41/9 42/6 43/3 51/10 56/20 60/2 there [76] there's [11] 8/8 17/15 18/13 18/21 21/20 23/14 44/16 47/4 47/13 49/6 58/23 thereabouts [1] 25/14 therefore [2] 30/12 40/9 these [16] 3/5 7/6 8/4 14/4 17/1 17/10 26/17 26/20 29/10 38/21 39/7 40/22 42/2 45/10 45/21 46/21 they [30] 2/1 3/24 4/14 4/14 7/15 7/16 19/19 20/15 22/2 22/2 23/15 30/25 34/25 37/24 45/1 45/5 45/6 45/8 45/9 45/13 46/11 48/6 48/8 52/12 52/22 52/23 52/24 56/16 56/18 59/18 thing [1] 26/7 things [3] 55/24 57/23 59/17 think [23] 4/3 20/4 22/4 22/22 27/3 30/19 30/25 33/2 35/1 35/3 35/24 45/10 49/4 50/25 52/22 52/22 54/20 55/1 57/1 58/21 59/2 59/11 59/17 third [3] 40/12 41/5 45/6	

<p>T triggered [1] 33/19 true [1] 1/24 trying [1] 22/13 turn [3] 1/18 49/22 55/13 Turning [1] 5/14 two [11] 9/6 9/12 13/11 13/16 14/4 37/19 37/20 38/14 48/17 55/25 56/2 Two-thirds [1] 9/12 Tyrone [1] 25/13</p>	<p>urgency [1] 39/18 urgent [1] 53/8 us [9] 1/3 34/5 40/18 47/24 48/14 51/9 54/14 55/2 59/25 use [4] 19/24 35/12 55/16 55/19 used [3] 42/3 43/9 47/8 user [1] 26/11 user-friendly [1] 26/11 using [4] 8/25 32/25 44/19 44/25 usual [4] 50/22 55/23 55/25 57/19</p>	<p>22/10 24/11 27/6 27/19 35/15 44/20 44/25 45/18 58/7 60/2 went [1] 5/6 were [96] weren't [9] 13/12 45/8 52/24 57/16 57/18 58/13 58/16 58/18 59/23 Western [1] 2/19 what [22] 6/5 6/10 7/9 7/19 11/16 12/15 14/9 17/16 20/4 22/2 22/4 22/13 24/8 27/4 35/7 35/16 46/16 52/1 52/3 52/3 52/14 57/15 when [24] 2/14 6/5 8/3 8/15 10/5 12/4 13/18 14/13 18/6 20/6 23/17 24/4 26/9 26/19 27/2 31/12 49/11 51/24 53/18 54/1 54/2 55/5 56/15 58/3 where [8] 3/7 3/10 18/2 35/11 43/7 43/24 49/14 58/21 whether [27] 12/7 13/9 13/9 17/17 18/3 20/15 23/4 23/15 23/25 24/5 32/12 33/23 44/12 45/14 45/16 46/23 47/2 48/6 53/4 53/18 54/4 54/15 56/15 56/21 57/10 57/19 57/25</p>	<p>17/8 17/10 19/18 23/14 25/25 26/3 28/15 49/15 53/21 57/17 57/17 58/3 58/5 widely [1] 24/4 will [9] 1/13 28/18 28/25 31/13 35/20 39/2 46/3 46/12 60/4 WILLIAMS [2] 55/14 61/7 Winter [34] 6/19 9/6 9/15 14/21 17/9 17/11 17/19 18/15 20/22 20/24 21/8 21/15 27/13 30/9 30/12 30/16 30/21 30/24 31/1 31/6 39/22 39/23 41/5 41/9 41/12 41/13 42/20 44/12 47/6 50/13 50/19 51/8 51/14 55/5 Winter's [14] 9/7 17/16 18/5 19/22 20/19 21/1 21/23 21/24 23/17 23/23 28/8 43/14 44/5 44/8 Winters [2] 52/17 52/20 within [4] 4/17 30/18 53/6 55/18 Without [1] 28/1 WITN10580100 [1] 2/3 witness [3] 1/15 27/22 28/3 witnesses [2] 27/17 57/21 wonder [2] 34/4 47/14 word [1] 55/17 work [3] 1/13 4/1 42/6 worked [1] 4/3 working [3] 4/7 44/13 55/8 would [51] 5/8 5/11 7/12 7/13 8/1 8/2 13/15 13/17 15/7 18/9 20/8 23/13 25/22 26/7 26/21 28/9 28/12 29/15 29/17 30/16 31/19 31/21 31/23 32/2 32/11 32/12 34/5 34/19 36/18 36/19 36/24 38/14 38/15 39/4 43/7 45/13 45/15 45/16 50/9 50/17 50/22 50/24 51/8 51/9 53/14 54/6 56/3 56/11 58/7 58/10 59/1 wouldn't [4] 8/8 27/14 57/19 58/5 written [2] 40/21 52/6 wrong [1] 25/2</p>	<p>wrote [1] 53/2 WYN [2] 55/14 61/7</p> <p>Y Yeah [1] 28/7 years [1] 18/20 yes [82] you [261] you'd [1] 18/16 you're [3] 35/7 44/13 47/10 you've [3] 44/14 57/8 57/15 your [60] 1/9 1/15 1/22 1/24 1/25 2/4 2/5 2/22 2/22 4/17 5/14 6/11 7/19 12/24 17/13 17/24 19/1 24/16 26/19 27/1 27/21 28/13 28/14 29/21 29/25 30/13 31/20 32/15 33/8 36/3 37/12 38/22 38/24 39/12 40/25 42/7 42/8 44/4 44/21 45/1 45/11 45/16 46/1 46/2 46/4 46/14 46/22 47/1 49/23 50/1 52/13 53/16 53/23 54/21 55/18 57/4 57/9 57/10 59/22 59/24 yourself [6] 20/18 21/21 23/25 31/20 59/11 59/20</p>
<p>U unable [3] 41/14 47/8 54/14 Unclear [1] 31/8 under [8] 15/3 16/9 21/9 25/7 25/19 26/21 31/11 33/17 underclaims [4] 19/23 19/25 20/13 20/14 underlying [1] 6/25 undermined [1] 36/20 understand [8] 7/9 8/20 11/7 12/20 22/13 26/24 30/23 59/9 understanding [8] 7/16 7/19 12/25 29/19 29/21 29/25 30/13 43/2 understood [2] 19/6 22/13 Unfortunately [1] 34/8 unit [11] 11/5 11/16 11/20 12/9 12/15 14/12 39/21 39/22 40/1 40/2 42/14 unknown [3] 21/12 25/11 48/15 unless [3] 10/4 43/9 44/10 unsigned [6] 34/24 34/25 35/1 48/8 49/12 49/14 unsurprisingly [1] 57/12 until [4] 2/9 38/9 54/2 60/10 unused [1] 37/5 unusual [3] 50/23 50/24 54/13 up [5] 22/20 25/7 34/16 58/9 59/4 Update [1] 41/15 updated [1] 22/18 upon [8] 8/11 8/19 8/20 24/6 27/21 28/5 32/15 34/15</p>	<p>V value [2] 10/18 12/1 various [1] 11/8 varying [1] 12/1 verbal [1] 52/6 verdict [1] 54/3 very [3] 45/5 56/25 60/2 via [1] 13/1 victim [1] 58/22 view [4] 8/5 16/25 45/16 57/10 views [3] 8/6 8/7 54/18 virtue [1] 33/14 visible [1] 1/20 visit [1] 40/8 visiting [1] 41/20</p>	<p>W Wales [1] 23/2 Ward [1] 60/6 warranted [1] 25/20 was [178] wasn't [7] 14/1 20/22 21/24 26/11 27/15 44/23 59/6 way [9] 9/12 9/20 10/11 19/12 20/12 20/16 43/18 55/2 58/4 ways [1] 29/10 we [67] we'll [1] 32/20 we're [2] 28/14 37/22 we've [5] 15/18 33/22 40/22 44/5 48/13 Wednesday [1] 1/1 week [6] 10/22 11/14 11/15 12/17 13/3 52/1 weekly [5] 10/12 10/14 10/16 11/2 11/3 weeks [5] 12/1 27/22 41/15 51/22 52/3 weighed [1] 26/22 weight [2] 8/2 8/8 well [15] 8/24 13/17 19/23 19/25 20/22</p>	<p>which [59] 3/2 3/7 3/10 4/3 5/19 5/25 6/6 8/11 9/13 9/15 9/23 10/1 11/9 11/10 11/20 12/8 12/24 13/2 13/3 13/19 16/19 22/11 22/20 23/18 26/15 26/18 26/22 27/20 27/21 27/22 28/4 29/16 29/18 30/7 30/22 32/8 32/16 34/15 35/3 35/17 37/14 37/15 37/21 38/21 39/11 44/18 44/24 45/7 45/19 45/25 46/14 49/4 49/16 50/22 52/10 53/11 54/13 59/22 59/23 Whilst [1] 11/23 who [17] 3/15 7/13 7/23 8/17 8/25 9/21 20/23 22/1 27/6 30/9 30/15 34/16 34/19 38/14 48/7 48/15 56/3 who'd [1] 55/21 whoever [2] 34/13 34/14 why [15] 8/23 17/6</p>	<p>(27) triggered - yourself</p>