Witness name: Linda McLaughlin

Statement No: WITN08480100

Dated: 28 December 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF LINDA MCLAUGHLIN

I, LINDA MCLAUGHLIN, will say as follows;

1. This witness statement is made to assist the Post Office Horizon IT Inquiry (the

"Inquiry") with the matters set out in the Rule 9 request dated 28 November

2023 (the "Request").

2. I can confirm I was assisted by the Post Office Limited ("POL") in confirming

insurance coverage for support in preparing my statement. I have also been

assisted by DAC Beachcroft LLP in the preparation and drafting of my

statement.

Background

3. I am a former employee of POL. I joined POL on 2 February 1987 having

previously worked in a Sub-Post Office as a Sub-Office Assistant for

approximately 4 years. I was recruited following an entrance exam and a

face-to-face interview. My previous experience working in a Sub-Post Office

meant that when I joined POL I already had transaction experience. As part

of my induction I attended a 1-week training course that was bespoke for Sub-Office Assistants. This was shorter than the normal induction due to my experience working in a Sub-Post Office.

- 4. Following my induction, I worked on the counter within the Crown Office Network for approximately 3 years. During this time I worked mostly in Belfast Post Office but also provided cover in Bangor Post Office and Shaftesbury Square Post Office. This role was as a Postal Officer grade performing counter duties.
- 5. In around 1990/91 I moved to the Belfast Audit Team where I worked as an Auditor. I initially worked in the team on a temporary basis providing cover for annual leave before I moved into a permanent role. This role was again a Postal Officer grade.
- 6. I spent the majority of my career working as an Auditor and although the job title changed through various reorganisations the role remained relatively the same. I did receive several promotions during this time and also moved into a training role when a reorganisation brought the Training and Audit Team together. I cannot recall the exact dates when I changed roles, but I have contacted the POL HR team who have assisted with some of the dates. I have listed below the specific roles I had during this time and a brief explanation of each role:

- a. 1991 to 1996 (approx.) Auditor/Network Auditor Responsible for conducting asset verification and compliance audits at Post Office Branches as determined by the audit schedule.
- b. 1996 (approx.) Retail Network Manager This was a temporary position covering maternity leave. I was the point of contact for a section of Post Offices in Northern Ireland. After 9 months I returned to my substantive Audit role which I held until 2002.
- c. April 2002 to July 2002 Performance Advisor I was promoted to a CM3 grade and was responsible for approximately 80 Community Offices in Northern Ireland.
- d. 2002 mid-2010 Senior Auditor (CM3 grade) I was responsible for assisting and leading asset verification and compliance audits at Post Office branches as determined by the audit schedule.
- e. Mid-2010 Dec-2010 Field Support Team Leader (Grade 2A) –.

 Responsible for Auditors in Northern Ireland. I also had responsibility for Auditors in other geographical areas during this time including Liverpool, Manchester, Glasgow and Edinburgh. I still actively completed audits in addition to having line management responsibility.
- f. Jan 2011 Audit and Training Team Leader (Grade 2A) Following a reorganisation a new team was created based in Northern Ireland and Scotland which amalgamated the previous Audit Team and Training Team. I was responsible for the delivery of the audit and training

programme to branches. This was mostly a line management role which I recall was for a team of approx. 10 to 12 people. Duties included Quality Assurance Reviews for Audit activity and onsite visits at branches during a Subpostmaster's initial training. My job title reverted back to Field Team Leader in October 2012.

g. October 2012 (approx.) – Area Manager (Grade 3B) – This was a unique role in Northern Ireland. The role was essentially Field Team Leader but also provided additional capacity during the Network Transformation programme.

7. I left POL in October 2016.

- 8. The Inquiry has asked about my role in relation to disciplinary matters. As an Auditor I did not get involved in any branch disciplinary matters. Disciplinary issues or concerns that were highlighted at a Sub-Post Office audit would be escalated to the Retail Network Manager or the Contract Manager (these titles changes during the years) for action. For Crown Offices this would be the Crown Area Manager. My only role would be in providing information to the relevant persons following an audit, but I would not be involved in any discussions or decisions regarding disciplinary action.
- 9. The Inquiry has asked me about any involvement I had in interviewing those accused of a criminal offence and my role in litigation case strategy. I cannot recall any involvement I had in either area. From memory I would expect interviewing to be conducted by the Security and Investigation Team. I have

no recollection of litigation case strategy and do not know what was required by POL in this respect or who was responsible for it.

- 10. The Inquiry has asked me about my role in disclosure in criminal and civil proceedings. I am not sure what is meant by disclosure and I do not recall having any involvement in disclosure during my time at POL. I do recall I was asked to make statements following an audit which I understand were for the purpose of criminal proceedings. I was also sometimes asked to provide documents to other POL teams, for example the Investigation Team or Contracts Manager may request a copy of an audit report.
- 11. The Inquiry has asked me what role I had in liaising with other POL departments in respect of the progress of cases. I would liaise with other teams as part of my role within the Audit Team. In particular I would liaise with the Security and Investigations Team who may have an interest in the result of an audit and require a statement from me for their investigation. I would also liaise with Contract Advisors and provide them with details of the audit and the audit report as requested. There may be other teams that would ask for similar information, but I can no longer recall any specific details.

The Audit Process and the Polices/Practices in place

12. As noted above, my role changes during my time in the Audit team and at various times I held the job title of Auditor, Senior Auditor, Audit Manager and Field Team Leader. During an audit my role would either involve assisting or

leading an audit of a Post Office branch. In essence the process would involve ascertaining what assets were held at the branch and comparing this to the reported cash, stock and vouchers. The Auditors would also complete a series of compliance checks to ensure that the Post Office procedures were being adhered to.

13. Whilst there were a number of processes and policies in place, I can no longer recall their details or when they changed. I do recall that when I first joined the Audit Team there was a manual system in place which later changed to a computerised system with the implementation of Horizon. The processes followed by the Auditors were updated to reflect this new practice.

Recruitment and Training of Auditors

- 14. The Inquiry has asked me to consider the following documents:
 - a. "Assurance Review Recruitment (Vetting & Training)" (version 1.0, 27
 October 2009) (POL00032698);
 - b. "Network auditing approach, methods and assurance" (2013) (POL00086765);
 - c. "Training & Audit Advisor" (undated) (POL00088453);
 - d. "Audit Advisor" (undated) (POL00088557).
- 15. In regard to the Assurance Review (POL00032698), I do not recall seeing this document previously. I also do not recall the document "Network auditing approach, methods and assurance" (POL00086765). They may have been considered by Senior Management rather than my grade. I do not recall ever

- being involved in the external recruitment process and I believe this would have been completed by the HR Team.
- 16. The other two documents, POL Training & Audit Advisor" (undated) (POL00088453) and "Audit Advisor" (undated) (POL00088557) are both job adverts. I do not recall seeing these documents previously, but the contents look to describe the key elements of each role.
- 17. From what I can recall Auditors tended to be recruited internally following an internal job advert. From memory it was usually Postal Officers who worked in Crown Offices that were recruited to the roles. There was no specific audit qualification required but a working knowledge of POL transactions and procedures would be listed as a requirement on the job advert.
- 18. When in the role an Auditor would receive training in various forms. New Auditors would initially shadow other team members and would be allocated a buddy to support their development. I remember when I was a line manager I would develop a training plan for a new team member which would introduce them to different aspects of the role and allow me to monitor their progress and ability to complete each task.
- 19. Auditors would receive further training as significant changes were introduced. For example, when car tax moved from a paper based to computerised system specific training was received. This training could take different forms depending on the requirements and included classroom training, workbooks, videos and various policy and process documents. I do not recall any refresher training that was provided to Auditors and the fundamental process remained relatively the same. I recall that when Horizon

was introduced the Auditors were provided with specific training. I do not recall the exact details but from memory there were two courses rolled out across the business. There was a 1-day course for individuals working on the counter and a 2/3 day course for individuals with back-office responsibilities. The Auditors would have attended the longer course.

20. The Inquiry has asked me if I considered then and now whether the Auditors had the necessary training and experience during my time at POL. I do not have any concerns and believe the Auditors had the necessary training and experience for the requirements of the role.

The Planning and Scheduling of Audits

- 21. I remember there were a number of different types of audits. This included planned audits, for example, where a branch was closing or transferring to a new Subpostmaster, and unplanned audits, for example, where there had been a robbery or burglary, or the Investigation team required an audit of a specific branch. These types of audits remained relatively consistent during my time in the team.
- 22. However, I can recall that the way in which other audits were scheduled changed during my time in the Audit Team. When I started in the team branches were audited on a calendar-based system. This meant each branch would be audited on a set frequency which would be determined by their size, products and how busy they were. Under this system some branches may be audited annually whereas others would be every two years.

- 23. I can see from the document Audit Plan & Scheduling, Chapter 1 of the Audit Process Manual" (Version 8.0) (2010) (POL00084650) that the method of planning changed in May 2004 when the Financial Branch Performance Profile was introduced. This was a risk-based system which meant branches would be audited based on their risk rating, which took into consideration specific factors, rather than a set schedule.
- 24. By the time I left in 2016 I can remember the risk-based audits involved two parts:
 - a. A Financial Assurance Audit (FAA) This was an audit of all cash, selected stock items and vouchers which would be counted by the Auditor. If this showed any discrepancies the audit could be upgraded to a Tier 2 audit which would include all stock items.
 - b. A Compliance Audit This would check the branches compliance with the Post Office procedures and following up on any gaps from previous audits.
- 25. How an audit was scheduled depended on the type of audit that was required. Audits for transfers and closures of Post Offices were scheduled in advance with the agreement of the incoming/outgoing Subpostmaster. Special audits were usually instigated by the Security and Investigation Team and would be arranged for a specific date. Risk audits were determined based on the availability and resources in the Audit Team. Compliance audits and follow up audits would usually be completed as a second audit of

the day. All audits would be scheduled as soon as it was operationally possible.

- 26. The frequency a branch would be audited would be dependent on the type of audit and the performance of the branch, i.e., the number of error notices, transaction corrections, cash and stock holdings etc.
- 27. The Inquiry has asked me to describe any enquires or investigations that were conducted before a branch visit. I cannot recall the exact details, but I do remember that before a special audit there would be a pre-audit meeting to make arrangements for the audit and to understand the reason for the audit. There would also be a discussion on the previous audit results for the branch in question.
- 28. The Inquiry has also asked me to describe any variation between the scheduling of audits in respect of Crown Office branches and other branches and to explain the reason for any differences. I do not recall if there were any different scheduling criteria based on the different branches.

The Auditing Process

29. When completing an audit, I would consider specific information which included the branches previous audit findings. I would also be able to access specific information on the branch, for example, how much cash they were holding. I believe an auditor could also access information on any transactions corrections that were due. I recall there was a branch database which Auditors could access to view this information. It would be important to

view and understand this information to aid with the planning and preparation of an audit. I recall this would have been the case for any audit and would not have differed based on the type of branch.

- 30. If a discrepancy was discovered at an audit the Auditor would have an initial conversation with the Subpostmaster or their staff to determine if any items had not been produced and therefore still needed to be counted. I recall that I would also check if any transaction corrections were due to be issued but I cannot now recall who provided this information. Where a discrepancy was over £1000 I would also report this to the Contract Advisor.
- 31. The Inquiry has asked me whether I was aware of a practice in which Auditors asked Subpostmasters to make good discrepancies on the day of the audit. From what I now recall if I was completing a transfer audit and a discrepancy was found the Subpostmaster would be asked to make good the discrepancy so the new Subpostmaster could start with a clear balance. I do not recall asking a Subpostmaster to make good a shortage on other audits. If there was a small shortage I believe I would have had a conversation with them to make good the discrepancy on completion of their own balance/cash account/branch trading statement. If there was a significant shortage I would report this to the Contracts Manger or Crown Area Manager as would be the process.
- 32. The Inquiry has asked me whether I was aware of Auditors being given instructions on taking payments from Subpostmasters. I do not recall this process, but I do recall that Auditors carried without prejudice receipts. In some audits a Subpostmaster would request to make good the shortage.

They would usually provide me with a cheque. In return I would provide a without prejudice receipt. I believe this would be used in the event of a Subpostmaster receiving a precautionary suspension due to a shortage where they wrote a cheque for the discrepancy. I cannot recall the exact wording, but I believe it explained that the cheque was accepted without prejudice to any further action taken by POL.

- 33. The Inquiry has asked me whether, on discovery of a shortfall, the Subpostmaster was able to and/or permitted to provide their own information or undertake their own investigation. From memory I recall that when the audit result was provided to the Subpostmaster they were offered the opportunity to check the audit figures. I would expect any further investigation on their part would be discussed with the Investigation Team.
- 34. During the course of an audit the Auditors would provide information to the Subpostmaster. On arrival the Lead Auditor would discuss the type of audit and would discuss how best to set up for the audit within the branch. They would advise the Subpostmaster that all cash, stock and vouchers would need to be produced and that the office could not open until permission was provided. The Lead Auditor would also advise the Subpostmaster on the completion of each stage of the audit, informing them when the financial aspect was complete and then when the compliance checks had been completed, reporting the results at each stage.
- 35. A closing meeting was held with the Subpostmaster where the audit findings would be discussed. The Subpostmaster was given the opportunity to discuss any concerns and raise any issues. Where an issue was raised by

the Subpostmaster it would be highlighted in the audit report, a hard copy of which was posted to the branch a few days after the audit. The Contract Advisor would receive a copy by email. A feedback form would be left for completion at the end of the audit.

- 36. The Inquiry has asked me if it was possible to conduct a branch audit in circumstances in which it was not possible to access the Horizon IT system. I do not recall if this was possible, but I note from the document "Post Incident Auditing without Horizon (POL00084003) that there is a process for auditing branches without access to Horizon. I can remember one audit I was involved in where a fire following an overnight burglary had damaged the Horizon equipment. In this audit we attempted to construct a balance within Belfast Cash Centre but could only count what was left and in the end we couldn't really construct a full balance.
- 37. I have also been asked by the Inquiry to describe any variations between the audit process in Crown Office branches in comparison to other branches and the reasons for those differences. I recall that in a Crown Office branch a minimum of 50% of stock was checked along with all dormant (non-assigned) stock and any stock held by the Branch Manager. Also, in Crown Office branches where there was a loss in excess of £1,000, this would be escalated to the Crown Area Manager. A loss of £10,000 would also be escalated to the Security Manager. For audits outside the Crown Network, depending on the Audit Type, they would be subject to a Financial Assurance Audit, a Tier 2 or a Compliance Audit as mentioned above. An audit shortage of £1000 or more

would be escalated to the Contracts Advisor while the Auditors were still onsite.

- 38. The Inquiry has asked me to consider two documents, the "Audit Trail Functional Specification" (version 8.0, 18 October 2004) (FUJ00001894) and Global User Account (September 2016) (POL00002841). I cannot recall seeing these documents previously, but I do recall I had a Global User Account issued to me. I cannot remember ever using it, but this may be because I was usually the Assistant Auditor rather than the Lead Auditor who would have taken on this responsibility. As far as I can recall the Audit Global User Account would allow an Auditor access to log onto the Horizon system where they could be identified as a user. This would be used when there was nobody in branch with "Manager Access" to Horizon and would allow the reports to be sourced and printed. I do not recall the audit measures that were in place but note that POL00002841 explains the process for who would be given an account and the actions that were required. I cannot recall this process from my time in the Audit Team.
- 39. The Inquiry has asked me what involvement Fujitsu had in the audit process.

 I cannot recall any interactions with Fujitsu in the Audit process, and I am not aware of any involvement they had in completing an Audit.
- 40. The Inquiry has also asked me whether Auditors had access to any information which was not available to Subpostmasters. I cannot recall anything from memory although I do remember that at one point Auditors were able to ring and check if any error notices or transaction corrections were imminent which I do not believe was available to Subpostmasters.

Audit and Investigation

- 41. The Rule 9 Request has asked me to consider the document "Condensed Guide for Audit Attendance (version 2, October 2008) (POL00104821). I understand from the Inquiry that the reference is incorrect and this should refer to document POL00084813.
- 42. The Inquiry has asked me to consider the circumstances when an Investigator would attend the audit of a branch and the role they had at an audit. From memory I can recall that special audits were requested by the Security team. An Investigator may attend but not always and it may be sufficient for the Auditor to make them aware of the result or provide them with a copy of the audit report.
- 43. There were occasions where an Investigator did attend the audit as part of the investigation they were conducting. They would usually introduce themselves to the Subpostmaster and explain why they had requested an audit. The Investigator did not get involved in the audit and would usually remain in the back office with the Subpostmaster. At the end of the Audit the Lead Auditor would provide the results to the Investigator before the Auditors left.
- 44. During my employment with POL, I worked with the Security Team in relation to requests for special audits they had requested. They may have been onsite during those special audits and they would also be my point of contact should witness statements be required as part of their investigation. I would also

have liaised with Security Team on an ad hoc basis with questions regarding Security procedures and equipment.

Prosecution of Alan McLaughlin

- 45. The Inquiry has asked me to provide a full account of my involvement in and recollection of the prosecution of Alan McLaughlin. The Inquiry has also asked a number of specific questions in relation to Mr McLaughlin's prosecution. I have endeavoured to answer these questions to the best of my knowledge and have considered the documents provided to me by the Inquiry. However, as the events are over 20 years ago, and I have not worked for POL for over 7 years, I do not recall these events clearly. I have provided as much information as possible in order to assist the Inquiry.
- 46. As noted above, the Inquiry has provide seventeen documents relating to the audit, prosecution and appeal of Mr McLaughlin. I have reviewed these documents and considered them in my response. I note that the document named "The audit report p.176 to p.188 Appendix L (AMCL0000031) does not appear to relate to the events of Mr McLaughlin's prosecution. This audit report is provided to Mrs L Archer, not Mr McLaughlin. It is also dated 3 September 2004. The Interview Transcripts (AMCL0000014) are dated 26 July 2001; therefore, it appears that the Audit report which I have received (Audit Report p176 to p188 AMCL0000031) relates to a later audit. To clarify I was not the Lead Auditor on the audit dated 26 July 2001. This audit was led by Ina Crawford, and I was there to assist. Although I have not seen the

Audit Report from 26 July 2001, I expect this would have been written by the Lead Auditor, Ms Crawford.

- 47. I can no longer recall but expect I would have been requested to assist at the audit by the Audit Scheduling Team. Based on the size of the branch it would have required two auditors present.
- 48. On 26 July 2001 I attended an audit at Brookfield Post Office with my Line Manager, Ina Crawford. Ms Crawford was leading a special audit which had been requested by Suzanne Winter. Ms Winter accompanied us into the branch, with her colleague Leslie Thorpe, where she explained the purpose of our visit. (List of Witness Statements p262 to 293 (AMCL0000031)). I do not recall having any involvement prior to attending the audit.
- 49. I assisted with the audit under the direction of Ms Crawford. There was a standard process which we would follow. Ms Crawford would have taken the lead, but we would both of worked on counting the cash, stock and vouchers as required. I also note that the pension dockets were counted as part of the audit. There would have been a process of counting the cash, stock and vouchers and recording this on a sheet which would then have been collated by Ms Crawford on her laptop to provide the overall balance.
- 50. On completion of the Audit Ms Crawford provided Ms Winter with the results. The audit examined cash, stock and vouchers and highlighted an error within the paid pension dockets with an overstatement of £381.60 (Group 13 £92.15, Group 7 £206.60 and Group 11 £82.85) (List of Witness Statements p262 to 293 AMCL0000031).

- 51. On completion of the audit and once the findings had been reported Ms Crawford and I left the branch. Ms Winter and Ms Thorpe remained at the branch to interview Mr McLaughlin. I did not have any involvement in the investigation outside of the audit but was later asked to provide a statement to the Investigation Team in regard to the findings of the audit.
- 52. The Inquiry has asked me if I was aware of any allegations made by Mr McLaughlin in relation to the reliability of the Horizon IT system. I do not recall being made aware of any allegations. As the Assistant Auditor my involvement was limited, and I would expect any allegations would have been shared with the Lead Auditor or the Investigators.
- 53. As noted above, I was asked by the Investigation team to provide a statement. I am aware the case progressed to Court and note that document AMCL0000034 lists the charges against Mr McLaughlin on 26 April 2004. I attended court as a witness but whilst wating in the witness room was told I would not be needed as Mr McLaughlin had pleaded guilty. I left the court and was not aware of any further details regarding Mr McLaughlin's prosecution or his sentencing.
- 54. The Inquiry has asked me what my reflections are on the way the investigation and prosecution of this case was conducted by the Post Office.

 The Inquiry has provided me with the Judgment of the Court of Appeal at AMCL0000037. My knowledge of Mr McLaughlin's prosecution is limited to my knowledge of the audit and therefore I cannot give a view on the way the investigation and prosecution was conducted. My understanding was the

audit identified discrepancies which were reported by my Line Manager, Ms Crawford to the Investigation Team. I understood that this formed the basis of the case against Mr McLaughlin but have a limited knowledge of the subsequent investigation and prosecution which I have set out above.

General

- 55. I have been asked by the Inquiry to what extent (if any) I considered a challenge to the integrity of Horizon in one case to be relevant to other ongoing or future cases. If a Subpostmaster raised an issue I would include this in the audit report which would be provided to the relevant parties. I would expect any issues would then be picked up and investigated as required.
- 56. The Inquiry has asked me if there are other matters I consider to be of relevance to Phase 4 of the Inquiry that I would like to draw to the attention of the Chair. Having left POL over 7 years ago I have had no further involvement in POL and do not recall anything further that may be of assistance to the Inquiry.

Statement of Truth

I believe the content of this statement to be true.

Signed GRO
Date 28/12/23

Index to First Witness Statement of Linda McLaughlin

No.	URN	Document Description	Control Number
1	POL00032698	Assurance Review - Recruitment (Vetting & Training) (version 1.0, 27 October 2009)	POL-0029633
2	POL00086765	Network auditing approach, methods and assurance (2013)	POL-0083823
3	POL00088453	Training & Audit Advisor (undated)	POL-0085511
4	POL00088557	Audit Advisor (undated)	POL-0085615
5	POL00084650	Audit Plan & Scheduling, Chapter 1 of the Audit Process Manual (Version 8.0) (2010)	POL-0081708
6	POL00083966	Audit Charter (version 4.0, undated)	POL-0081024
7	POL00084801	Performing a Branch Audit, Chapter 3 of the Audit Process Manual (version 5.1, May 2010)	POL-0081859
8	POL00085534	Core & Outreach Audit Process, Chapter 3a of the Audit Process Manual (version 1.0, 27 May 2011)	POL-0082592
9	POL00087627	Follow Up Audit Process, Chapter 3b of the Audit Process Manual (version 3.0, May 2015)	POL-0084695
10	POL00088252	Performing a Cash Centre Audit, Chapter 7 of the Audit Process Manual (version 5.0, Aug 2016)	POL-0085310
11	POL00087672	Quality Assurance, Chapter 11 of the Audit Process Manual (version 5.0, Apr 2015)	POL-0085310
12	POL00084003	Post Incident Auditing without Horizon, Chapter 14 of the Audit Process Manual (version 1.0, Nov 2006)	POL-0081061
13	POL00084813	Condensed Guide for Audit Attendance (version 2, Oct 2008)	POL-0081871
14	POL00085652	Requirement of Network Field Support Advisors at audit, following discovery of discrepancy (version 1.0, Oct 2011)	POL-0082710
15	POL00086765	Network auditing approach, methods and assurance (2013)	POL-0083823
16	POL00087688	Training Guide: Compliance Audit Tool (Sep 2015)	POL-0084746
17	POL00087716	Training-Aide for Branch Asset Checking (version 1.7, Nov 2014)	POL-0084774
18	POL00087614	Terms of Reference Audits (version 1,	POL-0084672

		April 2015)	
19	FUJ00001894	Audit Trail Functional Specification (version 8.0, 18 October 2004)	POINQ0008065F
20	POL00002841	Global User Account (September 2016)	VIS00003855
21	AMCL0000031	The audit report p176 to p188	AMCL0000031
22	AMCL0000014	The Interview Transcript	AMCL0000014
23	POL00113386	The incident log	POL-0110794
24	AMCL0000031	The email from Graham Ward to Suzanne Winter, dated 22 September 2004 p156	AMCL0000031
25	AMCL0000031	The statement of complaint p257 to 260	AMCL0000031
26	AMCL0000034	The indictment dated 26 April 2004	AMCL0000034
27	AMCL0000031	The list of witness statements (which appear to have been filed at the same time as the statement of complaint) p262 to 293 and p312 to 326	AMCL0000031
28	AMCL0000031	The list of exhibits p.367 to 373	AMCL0000031
29	AMCL0000031	The letter from Richard Gardiner of McClure Watters, Chartered Accountants, to John J Rice & Co Solicitors enclosing his draft report (dated 22 December 2004) p33 to 65	AMCL0000031
30	AMCL0000033	The case result form	AMCL0000033
31	AMCL0000036	The certificate of conviction dated 4 November 2021	AMCL0000036
32	AMCL0000037	The Court of Appeal judgment in <i>R v</i> McLaughlin	AMCL0000037
33	AMCL0000040	Alan McLaughlin statement – Prepared for Northern Ireland Court of Appeal Application	AMCL0000040