

Thursday, 18 April 2024

1  
2 (9.45 am)  
3 **MR BEER:** Good morning, sir. Can you see and hear us?  
4 **SIR WYN WILLIAMS:** Yes, thank you very much.  
5 **MR BEER:** Thank you, may I call Rodric Williams, please.  
6 **SIR WYN WILLIAMS:** Yes, of course.  
7 **RODRIC DAVID ALUN WILLIAMS (sworn)**  
8 **Questioned by MR BEER**  
9 **MR BEER:** Good morning, Mr Williams. As you know, my name  
10 is Jason Beer and I ask questions on behalf of the  
11 Inquiry. Can you give us your full name, please?  
12 **A.** Rodric David Alun Williams.  
13 **Q.** Thank you very much for coming to give evidence to the  
14 Inquiry today and for previously providing us with  
15 a very detailed witness statement. Can we look at that  
16 witness statement, please. It's WITN08420100. There's  
17 a hard copy in front of you. It's 131 pages long,  
18 excluding the exhibit sheet, and it's dated 11 March  
19 2024.  
20 If you can turn, please, to the last page, 131, is  
21 that your signature?  
22 **A.** Yes, it is.  
23 **Q.** Thank you. I think there are some corrections, four,  
24 that you wish to make. Can we deal with those in turn,  
25 please?

1

1 "environment"?  
2 **A.** Yes, please.  
3 **Q.** Then, lastly, page 97 and paragraph 195, which is at the  
4 top half of the page, five lines in, the line beginning  
5 "Their client for the purpose of giving or receiving  
6 legal advice", do you wish to insert the word "dominant"  
7 before the word "purpose"?  
8 **A.** Yes, it's line 1, 2, 3, 4, 5, 6, 7. So "dominant" --  
9 **Q.** So can you read the whole sentence you wish to change?  
10 **A.** "The same applies to communications between a lawyer and  
11 their client or a third party for the [insert  
12 'dominant'] purpose."  
13 **Q.** Okay, so it's that "purpose", not the earlier one that  
14 I'd identified?  
15 **A.** Yes, thank you.  
16 **Q.** So insert the word "dominant" before the word "purpose"?  
17 **A.** Thank you.  
18 **Q.** With those four corrections in mind -- there are some  
19 minor typographical errors that I'm not going to go  
20 through and correct, there are quite a few of those but  
21 I'm not going to correct them -- with those substantive  
22 corrections in mind are the contents of the witness  
23 statement true to the best of your knowledge and belief?  
24 **A.** They are.  
25 **Q.** Thank you very much. That witness statement can come

3

1 **A.** Thank you.  
2 **Q.** Page 18, paragraph 36. At the top of page 18, the  
3 sentence, "When I forwarded the email to John Scott and  
4 Rob King on 22 May 2014", should that read "2013"?  
5 **A.** Yes, that's correct.  
6 **Q.** So cross out "14" and write "13"?  
7 **A.** Correct, thank you.  
8 **Q.** Secondly, paragraph 41 on page 21. In the second line,  
9 you say, "I have no recollection of this email or the  
10 matter to which it relates but indicates that the basis  
11 for seeking recovery was that the amount alleged to have  
12 been gained was the proceeds of"; do you want to cross  
13 out the word "have been gained was the proceeds of  
14 crime" and instead insert the words "be owing was  
15 connected to a criminal conviction"?  
16 **A.** Yes, please.  
17 **Q.** So cross out the words "have been gained was the  
18 proceeds of crime" and insert "be owing was connected to  
19 a criminal activity"?  
20 **A.** Thank you.  
21 **Q.** Page 54, please. In paragraph 106 at the top of  
22 page 54, and the second line "amount to an audit of the  
23 audit processes used rather than a review of the  
24 assurance work itself", would you wish to cross out the  
25 words "work itself" and instead insert the word

2

1 down. As I've said, the witness statement is very  
2 detailed and you've obviously devoted a substantial  
3 period of time to the making of it by setting out the  
4 relevant events in largely chronological order and  
5 adding your recollections where you have them. I'm  
6 accordingly not going to ask you detailed questions  
7 about every aspect of the witness statement but,  
8 instead, take you to some of the more significant events  
9 over the past 12/13 years or so.  
10 Can I start with your background, please. You  
11 joined the Post Office in August 2012; is that right?  
12 **A.** Yes, late August.  
13 **Q.** You remain an employee of the Post Office?  
14 **A.** Yes.  
15 **Q.** Specifically, you are the Head of Legal in the Post  
16 Office's Remediation Unit?  
17 **A.** I'm a Head of Legal in the Remediation Unit, yes.  
18 **Q.** There's more than one Head of Legal?  
19 **A.** Yes.  
20 **Q.** Okay. How many Heads of Legal are there in the  
21 Remediation Unit?  
22 **A.** At the moment, I think there may be another two,  
23 possibly three. I'm not sure, I'm sorry.  
24 **Q.** Okay, so you're one of the Heads of Legal within the  
25 Remediation Unit; is that right?

4

1 A. Correct.

2 Q. I think you've held that role in the Remediation Unit  
3 since August 2020?

4 A. Yes.

5 Q. The Post Office's website suggests that the Remediation  
6 Unit has three main functions: compensation and redress  
7 for subpostmasters; administering matters related to the  
8 appeals of historic criminal convictions; and the  
9 provision of full assistance to this Inquiry?

10 A. I --

11 Q. Is that a fair summary of what it does?

12 A. I had thought the Inquiry was separate but it seems  
13 correct, yes.

14 Q. If you felt that it was separate, I mean, you work in  
15 it, is it separate or not?

16 A. I don't deal with the Inquiry Team so I thought it was  
17 separate.

18 Q. Right. So do you deal with compensation and redress?

19 A. I have done previously, yes.

20 Q. Do you deal with matters relating to the appeals of  
21 historic convictions?

22 A. I have assisted the company with that, yes.

23 Q. I'm sorry, I missed you there?

24 A. I'm sorry, I have assisted the company with that, yes.

25 Q. Does it follow that, notwithstanding your personal role

5

1 A. Yes.

2 Q. Do you accept that, since joining the Post Office, you  
3 remained bound at all times by the SRA's code of  
4 conduct?

5 A. I do.

6 Q. If we turn up, please, on the screen, page 11 of your  
7 witness statement, paragraph 22, you say in the first  
8 sentence you'd:

9 "... often been asked to distil or synthesise  
10 information provided from various parts of the business  
11 for other audiences within the business, particularly if  
12 the information concerns legal issues with which I have  
13 some familiarity."

14 Then at the end of the paragraph, you say:

15 "I generally rely on others for the accuracy of the  
16 content, especially if it concerns areas outside my  
17 expertise, with my role being to 'sense check' it."

18 Yes?

19 A. Yes.

20 Q. That might be interpreted as meaning that your role was  
21 limited to one of gathering pieces of paper written by  
22 other people together, like a cataloguer of information;  
23 is that what you were trying to say?

24 A. Yes.

25 Q. It might be interpreted as meaning that your role was

7

1 in the events which have happened since August 2012, you  
2 hold a senior position in the unit concerned with the  
3 provision of redress to subpostmasters --

4 A. Yes.

5 Q. -- and with the administration of issues relating to the  
6 appeals against their convictions?

7 A. Yes.

8 Q. In terms of your qualifications, I think you were  
9 admitted as a solicitor and a barrister in New Zealand  
10 in 1995?

11 A. Correct.

12 Q. You worked in that country on civil matters until 1998?

13 A. Yes.

14 Q. From 1999, you worked in civil litigation practice in  
15 the United Kingdom and you were then admitted as  
16 a solicitor of England and Wales in 2002; is that right?

17 A. Yes.

18 Q. You worked in New York between 2003 and 2006, when you  
19 then returned to the UK again to work in civil  
20 litigation matters?

21 A. Yes, I came back from New York at the end of 2005.

22 Q. Overall, do you accept, therefore, that you had  
23 considerable and wide-ranging experience as a civil  
24 litigator in private practice, prior to joining the Post  
25 Office?

6

1 limited to summarising the legal advice of others; is  
2 that what you were trying to say?

3 A. No, not necessarily. It would depend on the task at  
4 hand.

5 Q. So, over the decade period that we're talking about,  
6 sometimes you provided legal advice of your own?

7 A. Yeah, I would think that was right, yes.

8 Q. You didn't simply distil or synthesise the legal advice  
9 of others?

10 A. Not exclusively but I would have said predominantly,  
11 with the matters we're concerned with here.

12 Q. You mainly summarised other people's legal advice in  
13 that 10-year period; is that right?

14 A. No, I think that's an oversimplification.

15 Q. You tell us, then?

16 A. I'm sorry, what would you -- I'm struggling to  
17 understand, I'm sorry.

18 Q. Yes, it's entirely my fault. What was your role,  
19 looking at it as a whole, in the provision of legal  
20 advice to the Post Office concerning the Horizon system  
21 and matters that concerned it? Did you mainly summarise  
22 other people's legal advice and sense check it --

23 A. No, I would --

24 Q. -- or did you provide legal advice of your own?

25 A. It would literally depend. It's a very broad subject

8

1 over a long period of time. My primary role was to  
 2 ensure that the company was receiving the advice it  
 3 needed that might have come from a variety of sources,  
 4 it may have been something I could contribute to. But  
 5 the concern was the delivery to Post Office so that it  
 6 could act as it saw fit or as it saw it needed to.  
 7 **Q.** So it's neither one thing nor the other, it's both,  
 8 depending on the context?  
 9 **A.** Quite possibly and possibly at the same time. It may be  
 10 that I could contribute in addition to formal advice  
 11 received but ...  
 12 **Q.** In terms of the period before you moved to the  
 13 Remediation Unit, so from the time when you joined the  
 14 Post Office in August 2012 until, I think, August 2020,  
 15 that 10-year period, what was your job title?  
 16 **A.** I think it changed halfway through. I was -- I was  
 17 hired as, quote, "Litigation Lawyer", I think that was  
 18 the title, and then I became Head of Legal, (Dispute  
 19 Resolution & Brand).  
 20 **Q.** When was that, please?  
 21 **A.** I think that was in 2017, it's in my statement.  
 22 **Q.** That can come down, the statement that's on the screen,  
 23 thank you. Before you became Head of Legal in 2017, to  
 24 whom did you report?  
 25 **A.** I reported initially -- that's before I became Head of

1 a prosecuting authority?  
 2 **A.** I don't know that -- I became aware shortly after joined  
 3 that it there was prosecution activity, yes. I don't  
 4 know about Post Office being a prosecuting authority,  
 5 though. I'm not sure about that.  
 6 **Q.** I think you're probably now aware that, between 2000 and  
 7 2015, the Post Office brought some 850 prosecutions,  
 8 resulting in over 700 convictions?  
 9 **A.** I'm aware of that, yes.  
 10 **Q.** Are you now aware that, between April 2013 and June  
 11 2018, over 600 subpostmasters were suspended?  
 12 **A.** No, I wasn't aware of that figure.  
 13 **Q.** Did you have any role in that period -- that's '13 to  
 14 '18 -- in giving advice over the suspension of  
 15 subpostmasters?  
 16 **A.** I think it's likely that I did, yes.  
 17 **Q.** So you were aware that although in late 2013/early 2014,  
 18 prosecutorial activity ceased, the Post Office carried  
 19 on suspending subpostmasters?  
 20 **A.** Yes.  
 21 **Q.** What was your role in the suspension of subpostmasters?  
 22 **A.** I would -- so the part of the business that would be  
 23 responsible for that was a group of people called  
 24 Contract Advisers and that team would contact me, as  
 25 a member of the Post Office Legal team, from time to

1 Legal? Yes, I reported to a Head of Legal.  
 2 **Q.** Who was that?  
 3 **A.** For a period -- sorry, I don't -- I can't remember the  
 4 dates, it was to Hugh Flemington for a period and then  
 5 a colleague called Jessica Madron.  
 6 **Q.** After you became Head of Legal, to whom did you report?  
 7 **A.** I reported to the Legal Director, who was Ben Foat.  
 8 **Q.** Was that and has that been for the entirety of the  
 9 period from '17 until today?  
 10 **A.** Not until today, no. It was until I moved to the  
 11 Remediation Unit.  
 12 **Q.** Okay. Between August 2012 and moving to the Remediation  
 13 Unit, did you become aware of the very high number of  
 14 prosecutions that had been and, when you joined, were  
 15 still being brought against subpostmasters by the Post  
 16 Office?  
 17 **A.** I'm sorry, what was the date range again, please?  
 18 **Q.** August 2012?  
 19 **A.** Until?  
 20 **Q.** Until you moved to the Remediation Unit?  
 21 **A.** I became aware, yes.  
 22 **Q.** When did you become aware of the numbers of  
 23 prosecutions?  
 24 **A.** I couldn't tell you.  
 25 **Q.** When you joined, were you aware that the Post Office was

1 time, and ask me for my advice, my support, my input  
 2 into a case they may be looking at.  
 3 **Q.** So was that whether there were sufficient grounds to  
 4 suspend?  
 5 **A.** For the most part, that was their decision but they  
 6 might discuss a particular case to see what I thought --  
 7 yes -- I think yes is the answer. I'm sorry. Yes.  
 8 **Q.** So when you were giving this advice, although the  
 9 prosecution activity had stopped but the suspension  
 10 activity continued, looking at the matter generally, did  
 11 you bring into account any knowledge you had -- and  
 12 I think we're going to hear in due course it was  
 13 an unfolding knowledge, a developing knowledge -- of  
 14 bugs, errors and defects in Horizon?  
 15 **A.** Not that I specifically recall, no.  
 16 **Q.** Do you know whether corporately the Post Office brought  
 17 any developing knowledge that it had into account in  
 18 that period --  
 19 **A.** Um --  
 20 **Q.** -- ie "We've stopped prosecuting people, we're carrying  
 21 on suspending people, we may be relying on Horizon data  
 22 in order to suspended people, should we be doing so?"  
 23 **A.** I'm not aware of that, no.  
 24 **Q.** You make a point in your witness statement on a number  
 25 of occasions that you were not and are not experienced

1 in matters of criminal law; is that right?

2 **A.** I would describe myself as "not a criminal lawyer".

3 **Q.** When you were giving advice to senior executives and

4 others in the Post Office, did you make that explicitly

5 clear to them?

6 **A.** I may not have done.

7 **Q.** Why would that be?

8 **A.** Certainly when I joined there was a specialist criminal

9 lawyer. I had been --

10 **Q.** Was that Jarnail Singh?

11 **A.** Yes, that's correct. I had been hired to attend to

12 civil matters and I -- certainly to most of my

13 colleagues, it would be well known that I wasn't

14 a criminal lawyer and had no background or experience in

15 criminal law matters.

16 **Q.** When you say "colleagues", do you mean legal colleagues?

17 **A.** As my first -- yes, yes, I did mean that.

18 **Q.** I'm thinking about your "clients", in inverted commas,

19 even though you're an in-house lawyer. To what extent

20 did you make clear to -- let's restrict it at the moment

21 to senior executives, to whom you were giving advice,

22 that you were not a criminal lawyer or you were not,

23 using my formulation, experienced in relation to matters

24 of criminal law?

25 **A.** I don't recall expressly putting that disclaimer on

13

1 have been in what he wrote and in what he said in the

2 office.

3 **A.** No, I don't recall that, no.

4 **Q.** So if, thinking back, you formed an impression of him,

5 you would have thought he would have treated postmasters

6 fairly, would you?

7 **A.** Yeah, it's not something that had crossed my mind so I'm

8 sort of -- I'm hesitating. If I could phrase it as

9 a negative, I wouldn't have thought he'd treated them

10 unfairly. I'm sorry, I'm literally trying to think --

11 trying to cast my mind back to our interaction in the

12 office there and it's -- what you're describing isn't

13 something I observed, so it's hard for me to make

14 a positive statement, I'm sorry.

15 **Q.** How about this then: a conclusion that may be open to

16 the Chairman at the end of the Inquiry when he has heard

17 all of the evidence is that Mr Singh had a defective

18 understanding of the Code for Crown Prosecutors,

19 a defective understanding of his disclosure obligations

20 and the Post Office's obligations and the duties of

21 candour that a prosecutor owes in criminal proceedings.

22 Over your years of dealing with him, did you have any

23 concerns about Mr Singh's competence and suitability for

24 the role of Head of Criminal Law at the Post Office?

25 **A.** Sorry, it's quite a long question. But -- most of --

15

1 things.

2 **Q.** You mentioned Mr Singh. So, by the time you joined in

3 August 2012, I think he was the Head of Criminal Law in

4 the Post Office; is that right?

5 **A.** I think he was our only in-house criminal lawyer.

6 **Q.** Yes, and I think he was described as the Head of

7 Criminal Law, even though he was the only one?

8 **A.** I don't recall him being described that but ...

9 **Q.** Did you share offices with him?

10 **A.** Yeah, we had an open plan office, so, yes, we shared

11 that space.

12 **Q.** He has given evidence before the Inquiry and is due to

13 come back. He has made a number of statements in emails

14 and in correspondence which might reasonably be

15 described as demonstrating disdain for subpostmasters.

16 Was that an attitude of mind which you observed in him

17 at the time?

18 **A.** No, I wouldn't have said that, no.

19 **Q.** Did you instead form the view that he treated

20 subpostmasters and the issues that they were raising

21 with fairness and equanimity?

22 **A.** I don't believe I can comment on that. I wasn't close

23 enough to his work and I certainly didn't observe much

24 interaction between him and postmasters at all.

25 **Q.** Yes, I'm not talking about direct interaction; it would

14

1 **Q.** I'll break it down.

2 **A.** Yeah -- all right, I think I understand it. I'm sorry.

3 I don't think I'm competent to describe -- as I say, I'm

4 not a criminal lawyer, I don't know the extent to which

5 he was acting compliantly with the Prosecutors Code of

6 Conduct, for instance. I'm just not able to do that.

7 **Q.** So your lack of experience in criminal law wouldn't have

8 allowed you to form a view over his competence and

9 suitability to perform the function he was performing;

10 is that right?

11 **A.** I do not believe I'm competent to do that, no.

12 **Q.** More generally, what can you tell the chairman about

13 attitudes within the Post Office's Legal Team to

14 subpostmasters who sought to defend themselves against

15 allegations that they'd stolen money or were guilty of

16 false accounting but who themselves alleged that the

17 shortfalls were due to Horizon? What was the general

18 feeling, if there was one?

19 **A.** I don't think there was a general feeling. I think

20 it's -- I'm sorry, I'm really struggling with this

21 because it's -- I'm trying to picture the work

22 environment which is where I feel you're taking me, and

23 it's -- and correct me if I'm wrong on that. I don't

24 think --

25 **Q.** I am asking you about the working environment, I'm

16

1 asking you about a 10-year period and I'm asking was  
 2 there any attitude of mind towards subpostmasters?  
 3 **A.** I wouldn't have thought so, no. There was a lot of  
 4 discussion at the corporate communication level about  
 5 postmasters being the, you know, the heart of the  
 6 company, you know, and, clearly, the central component  
 7 of the business, the client/the customer-facing part of  
 8 it.  
 9 **Q.** Did that trickle down into the Legal Team?  
 10 **A.** It certainly trickled down to me. I can't speak for the  
 11 entire Legal Team.  
 12 **Q.** They're a commodity that needed to be cherished?  
 13 **A.** I wouldn't have described them as a commodity but the  
 14 cherished bit, I think, is important, yes.  
 15 **Q.** Okay, they're individuals, men and women who needed to  
 16 be cherished --  
 17 **A.** Yes.  
 18 **Q.** -- and treated with fairness at all times?  
 19 **A.** Yes, they're an important part of the business, yes.  
 20 **Q.** Would that be the *esprit de corps* of the Legal Team?  
 21 **A.** I wouldn't have necessarily said that because the Legal  
 22 Team were doing lots of things in different spaces,  
 23 there were parts of the Legal Team that had very minimal  
 24 contact with the postmaster community, for instance.  
 25 **Q.** Again, I'm not talking about direct contact with them.

17

1 asking, over 100 pages, you don't say anywhere that you  
 2 did anything wrong?  
 3 **A.** I think I have said I did something wrong.  
 4 **Q.** What was the thing you did wrong?  
 5 **A.** Well, I'm sure I've done others as well. Over 10 years,  
 6 I don't think I could bat it perfectly and I wouldn't  
 7 want anyone to have the impression that I think that;  
 8 things have gone wrong and that's why I'm here.  
 9 **Q.** What's the thing that you think in the witness  
 10 statement --  
 11 **A.** It's in the witness statement, I missed a reference to  
 12 the possibility for remote access.  
 13 **Q.** In the Deloitte report?  
 14 **A.** In an early Deloitte report, yes.  
 15 **Q.** So you inadvertently missed a sentence or a paragraph  
 16 within a Deloitte report --  
 17 **A.** Correct.  
 18 **Q.** -- which spoke about remote access in 2014?  
 19 **A.** Yes.  
 20 **Q.** I think that's the only thing -- I didn't read that as  
 21 you saying you did anything wrong because it was  
 22 an inadvertent slip?  
 23 **A.** I'm sorry, "wrong" is a very broad word. I may have --  
 24 I'm sorry, I --  
 25 **Q.** Okay --

19

1 I'm talking about in the way that we deal, as a Legal  
 2 Team, with the complaints and concerns that they are  
 3 raising, the subpostmaster community, how, as a Legal  
 4 Team, do we respond to them; give us an insight, please,  
 5 into the feeling within the office?  
 6 **A.** I would have thought neutrally. What we should be doing  
 7 is that no presumption either way. What is the case?  
 8 What is happening here? What is going on in this  
 9 particular branch? I would have said that -- I would  
 10 hope that was the attitude.  
 11 **Q.** So no predetermined mindset, a position of strict  
 12 neutrality between the subpostmasters, on the one hand,  
 13 and the Post Office, on the other?  
 14 **A.** I think I can only speak for myself with that but that's  
 15 something I would hope I had done.  
 16 **Q.** Before we get into the dozen or so topics that I need to  
 17 address with you, can we take a step back and look at  
 18 some of the written evidence you've given to the Inquiry  
 19 and then some of your conduct at the time. In terms of  
 20 the written evidence you've given to the Inquiry, would  
 21 this be a fair summary: in your witness statement,  
 22 firstly, you do not accept that you did anything wrong?  
 23 **A.** Have I said that?  
 24 **Q.** No, no, a summary means you don't read out each word or  
 25 don't read out the specific words: you summarise. I'm

18

1 **A.** Could you be a bit more specific? I'm sorry, I'm sure  
 2 I've done things wrong but it would be helpful to have  
 3 an understanding of when or what it might have been.  
 4 **Q.** Let's look at in this way: in your witness statement,  
 5 you either state or give the impression that you acted  
 6 appropriately or in accordance with your duties at all  
 7 times, right?  
 8 **A.** That was certainly my intent and my endeavour.  
 9 **Q.** I don't think you identify that any other person did  
 10 anything wrong?  
 11 **A.** I don't believe that's my role to judge.  
 12 **Q.** Well, it's not necessarily judging, is it? It's maybe  
 13 talking about the conduct of others, without passing  
 14 judgement on them?  
 15 **A.** Um --  
 16 **Q.** But it's right, isn't it, in your 137 pages, you don't  
 17 identify that anyone else did anything wrong, other than  
 18 inadvertently missing the sentence in the Deloitte  
 19 report?  
 20 **A.** Well, no, I don't believe I have done that in my witness  
 21 statement, no. I don't believe I --  
 22 **Q.** You don't offer any apology to subpostmasters in your  
 23 witness statement, do you?  
 24 **A.** I certainly tried to in the first paragraph.  
 25 **Q.** Well, let's look --

20

1 A. Sorry, third paragraph.  
 2 Q. Let's look at the attempt then. Is it paragraph 3 on  
 3 page 2?  
 4 A. Yes.  
 5 Q. Let's just read that to ourselves. *(Pause)*  
 6 Was that the attempt at the apology you're referring  
 7 to?  
 8 A. Yes.  
 9 Q. You offer deep regret at harm caused by events, rather  
 10 than harm being caused to subpostmasters by people or  
 11 harm being caused to subpostmasters by people in the  
 12 Post Office, or even harm being caused to them by the  
 13 Post Office. You offer regret that events caused people  
 14 harm, don't you, not people caused them harm?  
 15 A. Um --  
 16 Q. Is that as far as you were prepared to go?  
 17 A. No, that was my attempt to summarise what is quite  
 18 a large undertaking in --  
 19 Q. Yeah, you probably thought about this carefully, this  
 20 paragraph, didn't you?  
 21 A. Well, I hope so, yes. I thought carefully about most  
 22 of -- I hope I thought carefully about all of my  
 23 statement but, yes, this is important. I believe it's  
 24 why we're here.  
 25 Q. That's as far as you're prepared to go: express regret  
 21

1 gone on a long time and, certainly, I can only speak for  
 2 me but I would never have wanted this to have lasted  
 3 this long for anybody involved. I think, at the  
 4 beginning, sorry, back at paragraph 3, I sort of -- I do  
 5 say I hope this process helps people find closure and  
 6 I say I hope for myself, personally, too.  
 7 Q. Well, thank you for that.  
 8 Can we take that down from the screen and examine  
 9 a miscellany of issues before we look at the substance  
 10 of some points to try to see whether they assist us in  
 11 determining the nature of your role in all of this. Can  
 12 I start, please, with your role in the development,  
 13 pursuit and management of a narrative in the media by  
 14 the Post Office.  
 15 Can we look, please, at paragraph 169 of your  
 16 witness statement on page 84. Foot of the page,  
 17 paragraph 169, under a heading "Engagement with the  
 18 media". You say:  
 19 "[The Post Office's Communications Team] was  
 20 responsible for [its] engagement with the media. I was  
 21 typically the contact for Comms within [Post Office's]  
 22 in-house Legal Team if they felt they needed legal  
 23 support, which could range from *ad hoc* reviews of  
 24 statements they were proposing to make to legal advice  
 25 in respect of proposed broadcasts. I would arrange  
 23

1 that events caused people harm?  
 2 A. I mean, I will go so far as to say, if I have caused  
 3 somebody harm, I'm deeply sorry. That's not why I --  
 4 Q. Again, you haven't identified, in your statement, that  
 5 you have caused anyone harm or done anything wrong, do  
 6 you?  
 7 A. No --  
 8 Q. You don't identify any reflections or things that ought  
 9 to have been done differently, do you?  
 10 A. I tried to respond to the Rule 9 Request I had. I'm  
 11 sorry, I wasn't --  
 12 Q. We asked people whether they have any other reflections  
 13 they wish to give?  
 14 A. I conclude with the reflection.  
 15 Q. Let's look at that. Paragraph 255 on page 131. This is  
 16 part of the statement where people address the Inquiry's  
 17 question "Have you any other reflections or things you  
 18 wish to say?", an open question. You say:  
 19 "[You] regret the various processes intended to  
 20 resolve [postmasters'] civil law based ... complaints  
 21 have not achieved that resolution", and you hope it  
 22 happens soon.  
 23 Is that your only reflection?  
 24 A. I think it's an important one, because -- sorry, it's  
 25 not the only one, I think there is another. This has  
 22

1 external legal support where that was required, usually  
 2 from ... Cameron McKenna whom I had been introduced to  
 3 shortly after joining [the Post Office]. My role as  
 4 an in-house lawyer was one of legal risk manager, and  
 5 this was my focus in [the Post Office's] engagement with  
 6 the media."  
 7 That can come down. Would I be right, essentially,  
 8 to describe you as the point man for media relations in  
 9 the Post Office's Legal Team?  
 10 A. I think that's fair, yes.  
 11 Q. There was extensive involvement by you and other lawyers  
 12 in the Post Office's media relations, wasn't there?  
 13 A. On some of these matters, yes.  
 14 Q. Can we turn to paragraph 175 on page 88. You set out  
 15 your understanding of the Post Office's:  
 16 "... general attitude and strategy at that time  
 17 towards the media, and its aims in dealing with them,  
 18 was that the media could and would report on [the Post  
 19 Office]. It was therefore important to maintain an open  
 20 dialogue with journalists so as to get an insight into  
 21 what they might say and try to ensure they reflected  
 22 [the Post Office's] position, with matters only being  
 23 escalated to formal legal intervention if it was felt  
 24 essential to ensure a balanced presentation of [the Post  
 25 Office's] position in the finished publication."  
 24

1 Would you agree that that paints a benign or neutral  
2 picture of the Post Office strategy in relation to media  
3 relations?

4 **A.** I can't comment on what it portrays. I would not have  
5 described Post Office as necessarily benign with its  
6 media-facing public image.

7 **Q.** How would you paint or describe Post Office's media  
8 strategy, so far as concerns Horizon?

9 **A.** I wasn't responsible for setting strategy, so I would  
10 have taken instructions from the Communications  
11 Director.

12 **Q.** Your understanding of it?

13 **A.** I think it's -- particularly with the Horizon matters,  
14 Post Office felt it had its side of the story to tell  
15 and I think there's a feeling that people weren't  
16 interested in hearing it or engaging with it, probably,  
17 is a better example, a better word.

18 **Q.** So what was its strategy?

19 **A.** I don't know. That would have come from the  
20 Communications Director.

21 **Q.** You were engaged in that strategy yourself and you had  
22 no understanding of what it was; is that right?

23 **A.** I supported it. Strategy comes from the internal  
24 clients and the Legal team would help give effect to it.

25 **Q.** Did they tell you what the strategy was?

25

1 **Q.** If you didn't have an understanding of what Post  
2 Office's general attitude and strategy towards the media  
3 was, so far as concerned Horizon, can we look at some  
4 examples of how you approached the media in practice.  
5 I stress these are only examples; time doesn't permit me  
6 to go through all material. Can we start, please,  
7 with --

8 **A.** Just before we -- I'm sorry -- I'm struggling with these  
9 questions a little bit. Can I understand what you mean  
10 by "strategy"? Because I'm worried we have a disconnect  
11 and I do want to answer the questions properly.

12 **Q.** I haven't got my dictionary with me at the moment,  
13 Mr Williams, but I would understand and I intend by my  
14 questions the word "strategy" to mean as follows:  
15 a predesigned plan that has aims and objectives -- I'm  
16 making this up on the hoof -- that has aims and  
17 objectives. That's a strategy in my mind. Does that  
18 help you?

19 **A.** It does, thank you, and I'm sorry --

20 **Q.** It's just you used the word here, you see?

21 **A.** I appreciate, I'm sorry -- I'm sorry if that's my poor  
22 use. I just want to understand -- I'm sorry, I'm  
23 interrupting your question. Please.

24 **Q.** Should paragraph 175 read "I did not have  
25 an understanding of the Post Office's strategy towards

27

1 **A.** I'm not aware of -- like, if you're thinking that we  
2 have strategy documents and clear objectives on some  
3 matters, I don't think I saw something quite like that  
4 for these matters. So --

5 **Q.** Never mind a written document: an understanding of what  
6 Post Office's media strategy was. If you were giving  
7 effect to it, how would you know what it was --

8 **A.** Well --

9 **Q.** -- if you haven't been told.

10 **A.** -- I was giving effect to the instructions on  
11 a particular matter. I wasn't responsible for setting  
12 media strategy --

13 **Q.** I haven't asked you whether you were responsible for  
14 setting a media strategy. That's a different question.

15 **A.** I'm sorry --

16 **Q.** I'm asking of what your understanding was of the Post  
17 Office's media strategy was, so far as concerned  
18 Horizon?

19 **A.** I can't tell you because I'm not aware of one. What  
20 I did do is help Post Office respond to certain media  
21 Inquiry activities. The most, I guess, prominent of  
22 that being the Panorama programme. I helped assist  
23 that. Where that sat in Post Office's strategy, which  
24 may have issues of brand positioning, et cetera, behind  
25 it, I'm not sure. I can't speak to that, I'm sorry.

26

1 the media"?

2 **A.** Following this discussion, I think it may have read  
3 better, "My understanding of Post Office's general  
4 approach at that time to the media would have been" --  
5 and I apologise if I'm getting into sophistry or  
6 anything like that but the predesigned plan, I would  
7 have accepted if we'd something like that to have had  
8 that articulated or presented to me or made clear to me,  
9 and I don't recall having that and that's why I've been  
10 struggling. I'm sorry.

11 **Q.** Let's look at some examples, then, rather than of engage  
12 in sophistry, POL00101923 --

13 **SIR WYN WILLIAMS:** While that's coming up Mr Williams, can  
14 I just be clear, was this point man -- to use the  
15 expression -- role something you assumed more or less as  
16 soon as you joined the Post Office or was it later in  
17 time than that?

18 **A.** I -- thank you, sir. It was pretty much at the  
19 beginning, I --

20 **SIR WYN WILLIAMS:** Right --

21 **A.** I helped with something unrelated, probably, within --  
22 certainly within the first six months of my time.

23 **SIR WYN WILLIAMS:** Fine. So, if I can put it in this way,  
24 that part of your work was something that began shortly  
25 after you started and continued right through the period

28

1 that Mr Beer has identified?  
 2 **A.** That's correct, sir.  
 3 **SIR WYN WILLIAMS:** Fine, thanks.  
 4 **MR BEER:** Can we start, please, by looking at page 3 of this  
 5 document.  
 6 **A.** I'm sorry, I recognise this and it's quite a long email  
 7 train. Could I have the bundle reference, please?  
 8 **Q.** E51.  
 9 **A.** E51. Thank you.  
 10 **Q.** If we look at the foot of page 3, we can see an email  
 11 from Nick Wallis, the journalist, dated 16 December  
 12 2014, to Mark Davies. He was essentially in charge of  
 13 Post Office's media and communications; is that right?  
 14 **A.** Yes.  
 15 **Q.** Mr Wallis says:  
 16 "Hi Mark  
 17 "I wonder if ... your colleagues could help me with  
 18 a few queries."  
 19 He starts setting them out, yes? This was, I think  
 20 you'll recall, in the run-up to The One Show broadcast.  
 21 **A.** Yes.  
 22 **Q.** Thank you. If we go up the page, you'll see Mr Davies  
 23 passes it to a wider group of people, including you:  
 24 "Hi  
 25 "Another email from the BBC, now raising a series of  
 29

1 write red paragraphs or text in red against what he has  
 2 said, okay?  
 3 **A.** Correct.  
 4 **Q.** If we go back to his email there, they don't show up in  
 5 red but I can tell you which ones they are because I've  
 6 compared the text next to the originals of Mr Wallis'  
 7 email. If we scroll back to page 3, please, at the foot  
 8 of the page, so what Mr Wallis wrote was:  
 9 "Hi Mark  
 10 "I wonder if you or your colleagues could help me  
 11 with a few queries.  
 12 "When was the last time the Post Office did any  
 13 research into how satisfied or otherwise  
 14 [subpostmasters] are with the Horizon system? It would  
 15 be very helpful to know the scope of that research and  
 16 its results."  
 17 Then you wrote:  
 18 "Post Office constantly receives feedback on Horizon  
 19 from its tens of thousands of users through a variety of  
 20 sources."  
 21 Then over the page:  
 22 "The primary sources are NBSC, Horizon Service Desk,  
 23 Branch User Forum and NFSP. Feedback is also delivered  
 24 through a variety of [business as usual] processes ..."  
 25 Next paragraph:

31

1 new questions."  
 2 Yes?  
 3 **A.** Yes.  
 4 **Q.** Then if we go to the foot of page 2, we can see you  
 5 replied 16 December 2016, "Rodric Williams wrote", and  
 6 then if we go to the top of page 3, you say:  
 7 "Without having read them closely, only that this is  
 8 getting ridiculous -- we're being asked to address  
 9 an ever expanding range of serious issues, on  
 10 a piecemeal basis, with constantly shifting [goals] in  
 11 an attempt to get Mik Wallis a story which is 'news'.  
 12 "On the upside, they suggest we're starting to land  
 13 our points -- this line of enquiry is focused on the  
 14 'user-friendliness' of the Horizon, not the accuracy of  
 15 what it records or what we do with that information.  
 16 "I'll revert on the substance shortly."  
 17 If we go, please, to page 1. At the foot of the  
 18 page, your further reply to the same group of people,  
 19 again on 16 December, at just after 4.00, so it's about  
 20 an hour and a half after your immediate reaction and you  
 21 reply to your colleagues in detail on what's said, if we  
 22 scroll down. You say:  
 23 "Hi -- my substantive responses [to Nick Wallis']  
 24 latest questions are embedded in red."  
 25 You essentially go through Mr Wallis' email and  
 30

1 "That feedback is then implemented through regular  
 2 reviews and upgrades ...  
 3 "Ultimately though, any feedback has to be  
 4 considered in the context of the entire user base -- we  
 5 wouldn't roll out a (likely costly) system change  
 6 because a few agents asked for it. No business would."  
 7 Then you wrote this:  
 8 "We don't need to do research on Horizon -- it's the  
 9 system we provide to our agents ... and require them to  
 10 use. If agents don't like it, they can choose not to  
 11 provide services for us. The vast majority of our  
 12 agents and other users work with it just fine, and we're  
 13 not required to bespoke our Point of Sale accounting  
 14 system to the whims of each individual agent."  
 15 In relation to your reply, "We don't need to do  
 16 research on Horizon -- it's the system we provide to our  
 17 agents ... and require them to use. If [they] don't  
 18 like it, they can choose not to provide services for  
 19 us", was that your view: subpostmasters could either use  
 20 Horizon or leave?  
 21 **A.** Yes, because --  
 22 **Q.** Like it or lump it?  
 23 **A.** No, not necessarily but it is the system that was used  
 24 across many thousands of branches and I think tens of  
 25 thousands of terminals. That is the system that Post  
 32



1 Office provided.

2 **Q.** Well, it's obvious that it's the system that the Post  
3 Office provided. That's just stating a fact. What  
4 you've done is gone further. You've said, "We don't  
5 need to research Horizon. They can either use it or go  
6 away".

7 **A.** But I was commenting immediately above, it makes it  
8 quite clear that we do actually receive feedback.  
9 I think by this it's market research on users that --  
10 it's just saying we don't need to, I don't believe  
11 there's an obligation -- and I'm speaking as a lawyer --  
12 I don't believe there's an obligation on Post Office to  
13 do that.

14 **Q.** Was this part of your thinking in your time in this  
15 decade, if agents, if subpostmasters don't like Horizon,  
16 they can just down tools and leave. That's their  
17 remedy.

18 **A.** I don't think that's capturing what I've said here.  
19 I have to say, I can't exactly remember what my mindset  
20 was in --

21 **Q.** You agree that --

22 **A.** -- in 2014 but -- sorry --

23 **Q.** That's what it tends to suggest, doesn't it?

24 **A.** No, sorry, what I'd say the vast majority of the network  
25 was using the system fine. On a network that scale,

33

1 back would help, did you?

2 **A.** Well, that was -- no, this was a comment, internally, to  
3 colleagues. I wasn't saying this is what the  
4 response --

5 **Q.** What's the purpose of saying it to colleagues, then?  
6 It's to help in the formulation of the response?

7 **A.** Correct.

8 **Q.** Is this part of the strategy and approach that you  
9 described in your witness statement of at all times  
10 maintaining a willingness to maintain an open dialogue  
11 with the media?

12 **A.** I don't think they're connected yet because the way it  
13 works is -- the way I'd recall it working for us is  
14 things are circulated for input, views are heard and  
15 then a position taken, at which point that feeds into  
16 what is taken back to the media.

17 **Q.** Let's move on. We can skip the next paragraph where you  
18 draw an analogy. We go back to some text that Mr Wallis  
19 wrote. So his question was:  
20 "Is your statement about the vast majority of  
21 [subpostmasters] ..."

22 The point there, the statement he is referring to,  
23 is a statement that the Post Office put out in  
24 an earlier reply:  
25 "Is your statement about the vast majority of

35

1 it's impossible, I would think, to bespoke it to each  
2 individual's preferences --

3 **Q.** Well, it's not their preferences. You call them the  
4 whims. Is that what you thought the subpostmasters were  
5 complaining about or that was the basis of their oral  
6 and written complaints: whims? A "whim" meaning  
7 an eccentric flight of fancy?

8 **A.** That is the word I used at the time.

9 **Q.** You understand it to mean that?

10 **A.** Um --

11 **Q.** A whim?

12 **A.** Yes. That's the word I used.

13 **Q.** Did you think subpostmasters were on eccentric flights  
14 of fantasy?

15 **A.** No.

16 **Q.** Why did you use the word "whim"?

17 **A.** Because it struck me as being possibly very bespoke,  
18 very individualised requests for person preference. But  
19 I used the word "whim" and I think, in doing that, I was  
20 trying to trivialise the specific complaints being  
21 raised.

22 **Q.** Is this an example of what we read about in your witness  
23 statement, where you said that the Post Office's  
24 approach and strategy was to maintain an open dialogue  
25 in the media. You thought saying something like this

34

1 [subpostmasters] not having any problems with Horizon  
2 based on customer feedback or purely on the volume of  
3 successful transactions?"

4 Then we see your comments:  
5 "Our customers don't use Horizon.  
6 "If by 'customers' [Nick Wallis] means  
7 agents/Horizon users, we could point to the churn rate  
8 of agents -- ie if agents aren't happy with Horizon,  
9 they can leave the Network."

10 That's the same point you made above:  
11 "I think this would only show general churn, ie it  
12 wouldn't distinguish those that left because of Horizon  
13 as opposed to any other reason (eg retirement). Still,  
14 if the Network is fairly stable, a low churn would  
15 suggest that it's only a minority of agents that are  
16 unhappy with the system, which is consistent with what  
17 we have seen through the Scheme.  
18 "I get the sense from speaking to a number of  
19 [subpostmasters] that they don't like the system, they  
20 don't trust it and they live in fear in what the Post  
21 Office might do if they get something wrong with it."  
22 This is Mr Wallis speaking.  
23 "It may be because I only come into contact with  
24 [subpostmasters] who are having problems that I keep  
25 hearing this, so it would be useful to know the other

36

1 side of the coin."  
 2 You say:  
 3 "Same points as above.  
 4 "On the 'they lived in fear ...' point, it is wrong  
 5 for an agent to deliberately cover up branch losses and  
 6 falsify the figures the agent enters into the system."  
 7 So in these paragraphs, in your response to your  
 8 colleagues, you're making the same point, aren't you,  
 9 that the measure of Horizon's reliability or success can  
 10 be seen through the number of subpostmasters that are  
 11 leaving the business --  
 12 **A.** I think it's rather the other way. It can be seen by  
 13 those who are staying within the business.  
 14 **Q.** -- ie it must be a good system because, otherwise, more  
 15 would leave?  
 16 **A.** Well, at least an acceptable system.  
 17 **Q.** Was that your best evidence base, when you were writing  
 18 this two and a half years into your role, for the  
 19 reliability of Horizon, the number of subpostmasters  
 20 that were leaving the Post Office?  
 21 **A.** No, I'm looking for -- I was looking for things that  
 22 could contribute to the discussion. What was -- and  
 23 maybe this is getting -- it's not quite a strategy --  
 24 I'm sorry. There was -- my recollection is that there  
 25 was a feeling that the complaints being raised about

37

1 so I think that may have been --  
 2 **Q.** I'm sorry?  
 3 **A.** I think they that may have been a very poorly worded  
 4 email.  
 5 **Q.** Which word did you intend to use instead of "puerile"?  
 6 **A.** I'm sorry it's on two screens.  
 7 **Q.** Yeah, we can look at the bottom of the third page and  
 8 the top of the -- that's it. Question at the bottom of  
 9 page 4 --  
 10 **A.** I think I know why I'm saying it now, sorry. You know,  
 11 "SPMRs love using Horizon and trust it implicitly".  
 12 It's a very high bar. I don't know too many people who  
 13 really love their computer systems, I'm sure there are  
 14 people. But I think that's what the expression is going  
 15 to. Do we have data that says people love using  
 16 Horizon? I -- I --  
 17 **Q.** He's asking, isn't he, for data that backs up  
 18 a statement that the Post Office made that the vast  
 19 majority of subpostmasters are not having any problems  
 20 with Horizon?  
 21 **A.** Well, no, he is there asking for -- he is asking for  
 22 evidence that postmasters love using Horizon and trust  
 23 it implicitly, and I think I read that as setting  
 24 an impossibly high standard for us to have evidence --  
 25 information that would show that. I don't -- that's

39

1 Horizon were being raised by a small number, a small  
 2 proportion of the network and that it was being used  
 3 successful by the vast majority of the network every  
 4 day, aggregating up to -- and I think I can still  
 5 remember, hopefully, the numbers -- 6 million  
 6 transactions a year, to -- sorry, 6 million transactions  
 7 a week, 2 billion a year, across the 11,500 plus or  
 8 minus branches, and we were seeing a very small number  
 9 of complaints. That --  
 10 **Q.** He is asking for the data, isn't he, in this last  
 11 paragraph:  
 12 "If you have any data which shows the vast majority  
 13 of [subpostmasters] love using Horizon and trust it  
 14 implicitly, it would be useful to have that  
 15 information."  
 16 So he is asking the very question that you have just  
 17 referred to. Let's see what your response is over the  
 18 page, please:  
 19 "This is puerile."  
 20 Why did you think that Mr Wallis' question, "If  
 21 you've got data that shows that if subpostmasters like  
 22 using Horizon and trust it, it would be useful to have  
 23 that information", why you think that was puerile;  
 24 "puerile" meaning childish, immature or petty?  
 25 **A.** I'd say, looking at it today, it doesn't feel puerile,

38

1 what I think I'm saying there.  
 2 **Q.** You carry on:  
 3 "The best I can think of is to show that agents  
 4 aren't voting against Horizon with their feet ..."  
 5 That's the third time you've referred to that.  
 6 **A.** Yes.  
 7 **Q.** Was that the best evidence?  
 8 **A.** I don't know. Certainly, when I wrote it, it was the  
 9 best I could think.  
 10 **Q.** Overall, would you agree that, without focusing on the  
 11 individual paragraphs, in this part of Mr Wallis'  
 12 request he's asking for some data, some material, that  
 13 backs up a statement that the Post Office had made that  
 14 the vast majority of subpostmasters are not having any  
 15 problems with Horizon?  
 16 **A.** I'm sorry, could you repeat that? Sorry, I was reading.  
 17 **Q.** In this part of his request, he is asking, generally,  
 18 for some evidence, some data, some material, that backs  
 19 up a statement that the Post Office had made that the  
 20 vast majority of subpostmasters are not having any  
 21 problems with Horizon. Overall, the best you can come  
 22 up with is that they're not leaving the business?  
 23 **A.** That's the best I can come up with. I think earlier on  
 24 we saw there was references to the NBSC, call log data,  
 25 et cetera. I think that would be better management

40

1 information than churn rate, which was another strand of  
 2 management information that may support, I guess, user  
 3 acceptance, if not happiness.  
 4 **Q.** Can we move on to some of your other contributions to  
 5 Post Office's media responses. POL00150306. Can we  
 6 look at page 2, please.  
 7 **A.** Sorry, I think this is another one that may have been --  
 8 it wasn't in the core bundle either, can I have the  
 9 bundle reference?  
 10 **Q.** E86, if you want to look at it in hard copy.  
 11 **A.** Thank you.  
 12 **MR BEER:** Sir, I should just explain to you that the little  
 13 delays that are occurring are because Mr Williams has  
 14 said that he wants to be given the tab numbers in the  
 15 bundles and read the documents in hard copy, rather than  
 16 looking at them on the screen.  
 17 **SIR WYN WILLIAMS:** Yes, I have understood that from the  
 18 exchanges, Mr Beer. Thank you.  
 19 **THE WITNESS:** I'm grateful, sir.  
 20 **MR BEER:** E86. Look at page 2, please. If we scroll down,  
 21 please. We see again the Mr Wallis email, yes.  
 22 **A.** Mm-hm.  
 23 **Q.** Can you see that, the 16 December one? This has got no  
 24 writing on it, okay? So it's the same originating  
 25 email?

41

1 something else?"  
 2 You agree that he is there expressing the same  
 3 sentiments as you, albeit you hadn't written them yet --  
 4 **A.** Err --  
 5 **Q.** -- ie put up with the system or leave?  
 6 **A.** It's an option.  
 7 **Q.** He says:  
 8 "I like this email that Mel [that's Melanie  
 9 Corfield] sent me earlier, from a [subpostmaster] ..."  
 10 Then he sets it out.  
 11 Then, in conclusion, at the foot of his email he  
 12 says:  
 13 "... I'm not sure it merits more than a cursory  
 14 response."  
 15 Then, if we scroll up, please, you say to him:  
 16 "I swear, you are the only person I've met more  
 17 cynical than me, and then by some considerable margin  
 18 ..."  
 19 He then replies to you:  
 20 "Thank you, sir, I take that as a serious badge of  
 21 honour [smiley face]."  
 22 Then you say:  
 23 "As intended!"  
 24 Did you treat this as a joke?  
 25 **A.** No, far from it.

43

1 **A.** Okay.  
 2 **Q.** But this chain goes off in a different direction, okay?  
 3 **A.** Thank you. I appreciate that.  
 4 **Q.** If we scroll up, please. We see Mark Davies' "sending  
 5 it on email", we saw earlier. Then scroll up, please,  
 6 we see a reply from Patrick Bourke, who was he?  
 7 **A.** He was -- is a colleague, I don't know what his title  
 8 was at that time. He had worked -- I think he had come  
 9 into Post Office to work on the Mediation Scheme and  
 10 I think is now -- he's certainly in the Communications  
 11 Team, I think maybe the Public Affairs Director, but I'm  
 12 not certain of that.  
 13 **Q.** At the time, I think his title was Government Affairs  
 14 and Policy Director; would that sound right?  
 15 **A.** That does sound right, thank you.  
 16 **Q.** Let's look at what Mr Bourke thought at about Mr Wallis'  
 17 email.  
 18 "Apart from its breathtakingly facetious tone, this  
 19 looks to me to be clutching at straws a little ...  
 20 "That some subpostmasters don't like the system is  
 21 inevitable; I don't particularly like working in Old  
 22 Street with its rodent problem. 'Living in fear' is  
 23 going too far in my view. They chose to sign a contract  
 24 to provide services in an honest and diligent way.  
 25 Rather than living in fear, would it not be better do

42

1 **Q.** Was this attitude bravado by you, a competition between  
 2 you and Mr Bourke, the Government Affairs and Policy  
 3 Director, on who could be more cynical about  
 4 subpostmasters?  
 5 **A.** No.  
 6 **Q.** Why did you exchange these emails, then?  
 7 **A.** When you're working under pressure, sometimes you write  
 8 an email that, when you look back at it 11 years  
 9 later -- sorry, I can't do the maths -- nine years  
 10 later -- you regret the expression. But I think emails  
 11 exchanged just between two colleagues like that from  
 12 time to time occur.  
 13 **Q.** So are we to put this in the "banter" category: "top  
 14 bants" between mates?  
 15 **A.** I'd say yes.  
 16 **Q.** The truth of it is that you adopted the same attitude of  
 17 mind, didn't you? "We're deeply cynical about all of  
 18 these subpostmasters. The best thing they can do is, if  
 19 they've got any complaints about our system, they can  
 20 leave". That was your and his attitude of mind, wasn't  
 21 it?  
 22 **A.** No, I think you're reading too much into an email  
 23 exchange there, with respect.  
 24 **Q.** Why didn't we see in these emails, some self-reflection?  
 25 "Have we got any surveys of whether subpostmasters have

44

1 difficulties? What do the statistics show on the number  
 2 of calls made to various helpdesks that we offered? Is  
 3 there an analysis of those? Are there any levels of  
 4 satisfaction with those? What proportion of complaints  
 5 about Horizon are successfully remediated?"

6 **A.** I'm --

7 **Q.** That's what he was asking for. That kind of thing,  
 8 wasn't it?

9 **A.** Well, I -- I'm sorry, that's a list I think you've read.  
 10 That's not in there. But I imagine it is along the  
 11 lines of -- well, I don't know what Nick Wallis was  
 12 asking for there. He asked for, what I saw, data of  
 13 people loving the system and trusting it implicitly.

14 **Q.** So you focused on the "love" bit and thought narrowly --

15 **A.** In the entirety of the email --

16 **Q.** -- "Have we got any surveys or that that shows that  
 17 Horizon is loved by subpostmasters? No, and that's  
 18 a puerile question. End of story".

19 **A.** No, when you look back at the exchange, you can see  
 20 other people have contributed to it and there is  
 21 reference to NBSC call log datas, and the like, that  
 22 provide sources which could be explored further if  
 23 that's the direction that would be taken in response to  
 24 this.

25 **Q.** Can we look, please, at POL00101968, B202. If we go to  
 45

1 So this is 12 days in advance.

2 Then if you just scroll through it, rather than  
 3 reading it in detail, she sets at a summary of the  
 4 issues to be covered in the programme. Can you see  
 5 that?

6 **A.** Yes.

7 **Q.** If we scroll on still further, there is a relatively  
 8 detailed summary and then a series of questions. If we  
 9 go to page 8, please, and scroll down, please, we'll see  
 10 that this gets forwarded to you.

11 **A.** Yes.

12 **Q.** We can see your reply on 7 January. You say:  
 13 "I haven't yet looked at the detail of the email,  
 14 but see that the BBC want to film ...  
 15 "There is a lot happening next week [next  
 16 paragraph]."  
 17 Then:  
 18 "Not really a legal issue I know, but given the  
 19 BBC's approach to date, the close engagement it has with  
 20 JFSA, and the timing of the piece, I smell a rat ..."  
 21 What was the rat that you smelled?

22 **A.** The timing seemed --

23 **Q.** Smelling a rat means that somebody is trying to deceive  
 24 you or harm you by artifice?

25 **A.** No.

47

1 page 10 at the bottom, please. Thank you. Sorry,  
 2 behind with the bundles.

3 **A.** I'm sorry, what is the tab?

4 **Q.** Do you wish, Mr Williams, to look at this in a bundle?

5 **A.** Yes, I'm sorry. My bundle broke open so I'm trying to  
 6 put the paper back. Which tab is it, please?

7 **Q.** B202.

8 **A.** Thank you. I'm sorry, I've only seen these this morning  
 9 so I'm still familiarising myself. Thank you. Thank  
 10 you, sir.

11 **Q.** Page 10 at the foot of the page and over to page 11.

12 **A.** Yes.

13 **Q.** This is a document you exhibited to your witness  
 14 statement.

15 **A.** Yes, thank you.

16 **Q.** You'll see that Jane French, who was then, I think, the  
 17 BBC's Current Affairs Editor, sending an email on  
 18 7 January to Mr Davies, copying Mr Wallis in. So this  
 19 is after The One Show programme had been aired and is  
 20 instead about a forthcoming Inside Out programme.  
 21 If you just scroll through, she says to Mr Davies:  
 22 "Thank you ... I am now writing to invite you to  
 23 give us a filmed interview for our regional current  
 24 affairs programmes Inside Out which will be reporting  
 25 the subject on 19 January on BBC One."  
 46

1 **Q.** What did you mean by you smelt a rat?

2 **A.** It looks like it's organised. I think something is up.

3 **Q.** What was up?

4 **A.** The timing of this seemed to be well aligned to put  
 5 pressure on the Post Office.

6 **Q.** Why was there a problem with the BBC reporting issues  
 7 with the Horizon system and with the Post Office being  
 8 given an opportunity to respond?

9 **A.** There's nothing wrong with that.

10 **Q.** What was the rat, then? What was the deception being  
 11 practised?

12 **A.** I've said I don't think any deception was being  
 13 practised. That's not what I've said.

14 **Q.** What were you intending to say by, "given the approach  
 15 to date, the close engagement the BBC has with the JFSA  
 16 and the timing, I smell a rat"? What did you think was  
 17 going to happen?

18 **A.** I'm sorry, I thought I'd answered that. The timing  
 19 seemed convenient and --

20 **Q.** Convenient to who?

21 **A.** Postmaster complainants.

22 **Q.** Right and, therefore?

23 **A.** I'm sorry, you've lost me. You keep saying -- I don't  
 24 think there's any deceptive -- I'm not using that in  
 25 this respect. That's your interpretation. I'm sorry  
 48

1 if --

2 **Q.** What did you mean by "smelling a rat"?

3 **A.** I'm sorry, I've tried to answer that a couple of times,

4 it's the timing.

5 **Q.** Well, try a third time, then. What did you mean by

6 "smelling a rat"?

7 **A.** That the timing --

8 **Q.** What did --

9 **A.** -- seemed calculating --

10 **Q.** -- think the BBC was up to?

11 **A.** They were going to put a piece that was timed with

12 events that may have taken place at a working group

13 face-to-face meeting. It looked like there was building

14 up to a media broadcast or something along those lines

15 that would have advanced the postmasters' complaints.

16 **Q.** Can we turn to POL00105856. That's tab E57. Can we

17 start, please, by looking at page 4.

18 **A.** Sorry E5?

19 **Q.** 57.

20 **A.** Thank you. I'm sorry, I'll go straight to the bundle in

21 future. I'm sorry. Thank you.

22 **Q.** If we just scroll down, you'll see it's an email from

23 Melanie Corfield who was in the Comms Team; is that

24 right?

25 **A.** Correct.

49

1 (which McLachlan patently is), especially if they have

2 an axe to grind ..."

3 Then you set out a proposed reply to the BBC.

4 In what respect did you think Professor McLachlan

5 had an axe to grind?

6 **A.** So the expression "axe to grind" was one I gained from

7 the Post Office's media lawyers and it's a term of art.

8 I became aware of a type of contributor who may have

9 a vested interest in the piece.

10 **Q.** So it was a term of art, "axe to grind"?

11 **A.** That's my understanding and that, I think, was my use of

12 it there.

13 **Q.** Does that mean that anyone who had a vested interest,

14 including, for example, subpostmasters or, indeed, the

15 Post Office, couldn't make a contribution?

16 **A.** No. What I think it lent itself to -- and I'm sorry,

17 it's been a while since I've looked at this sort of

18 material on that -- it just meant, I'm thinking of the

19 BBC Guidelines that their contributions needed to be

20 treated with greater care. I'm paraphrasing and

21 apologies to the BBC if I am misconstruing that or

22 misstating it, but that's my recollection.

23 **Q.** So it was to point out to the BBC that they shouldn't

24 regard Professor McLachlan as impartial and to remind

25 them of their guidelines in that respect; is that

51

1 **Q.** If we scroll up, please, she says -- we can see who this

2 is addressed to when we look at the "reply all" later:

3 "Now that they have finally revealed the names of

4 interviewee 'experts', including Charles McLachlan,

5 expert defence witness in the *Misra* case, I think we

6 should use this [to] go back to Ceri ..."

7 We can see from the context of the email as a whole,

8 this was the beginning of a debate on the approach that

9 should be taken to Ceri Thomas, who I think you may

10 remember, in mid-2015, would have been the editor of

11 Panorama? Yes?

12 **A.** That's not something I recall, but no.

13 **Q.** In any event, she, Mel, is talking about a proposed

14 contribution by Professor Charles McLachlan, yes?

15 **A.** Yes.

16 **Q.** Then if we go to page 2, please, at the bottom, we can

17 see what the title of the email was, "Another throw of

18 the dice at Ceri Thomas?" You say:

19 "All -- I want to think about this overnight, but

20 I'm not inclined to offer anything directly because of

21 the CCRC (sorry, but we've learned a lot more about the

22 programme since I sent my last email on this!)."

23 Then over the page to the top of page 3:

24 "Instead, we could use as a hook the BBC Guidelines

25 in and around relying on people who are not impartial

50

1 a summary?

2 **A.** That's probably fair, yes.

3 **Q.** Thank you. Can we move on, please, to POL00152725

4 I think that's E91.

5 **A.** Thank you.

6 **Q.** Go to page 2.

7 **A.** Sorry, did you say --

8 **Q.** E91.

9 **A.** I'm sorry, that doesn't seem -- I have POL 152725, this

10 seems to be different.

11 **Q.** Yeah, POL00152725 of E91.

12 **A.** I have a -- I'm sorry, I beg your pardon, I do have a --

13 **Q.** They're double-sided pages?

14 **A.** I'm sorry.

15 **Q.** On 3 July 2015, Melanie Corfield wrote to you, "Not sure

16 if any use":

17 "Was just checking on something and came across the

18 below from Coomber Rich solicitors ..."

19 You'll see that she cuts in something in that

20 paragraph from that firm of solicitors website:

21 "... in 2013 when interim report came out. It just

22 confirms they are looking at appeals then regarding the

23 cases they had (think *Hamilton* and *Misra* but can't

24 remember!) on the basis of information from the

25 investigation so thought it might be of use to you at

52

1 some point. It also makes clear case-by-case basis,  
2 a point I am still trying to make journals and  
3 politicians understand!!! How can anything be decided  
4 in any other way?!"

5 Then back to the first page, please, foot of the  
6 page, you say:

7 "Thanks Mel.

8 "You might recall that the (first?) One Show piece  
9 at the end of last year interviewed a criminal ...  
10 solicitor (who may be from that firm) ... It is telling  
11 they have not been involved in any appeal.

12 "[And] yes, each case has to be looked at on its own  
13 facts."

14 Then scroll up, please. She replies to you:

15 "Oh yes -- ... that was Issy Hogg who is from this  
16 firm, I think. I believe she gave the incredible quote  
17 that 'They don't look like criminals'. From a media  
18 point of view I am astounded that no one ever seems to  
19 ask the defence lawyers why their clients pleaded guilty  
20 and why they have not tried to appeal. Seems it is only  
21 the Post Office who get asked the questions! Oh well --  
22 sunny weekend ahead hopefully and Panorama story still  
23 not showing in the schedules ..."

24 Was it a commonly held view within the Post Office  
25 to think it was only the Post Office who got asked the

53

1 Mark is. You'll see that he is a writer at the  
2 Shropshire Star, or at least he was in mid-2015. If we  
3 scroll up to the text of his email, he says:

4 "Further to our conversation a few minutes ago, I am  
5 following up the story that Second Sight has written to  
6 the Government saying that its findings of its report on  
7 the Horizon system have been misrepresented. The story  
8 is on page 10 of yesterday's Telegraph, and I have  
9 spoken to Ron Warmington of Second Sight who has  
10 confirmed his concerns have been misrepresented after  
11 [the minister] said: 'Second Sight produced two  
12 independent reports -- one in 2013 and the other earlier  
13 this year -- both of which found there was no evidence  
14 of systemic flaws in the system'.

15 Mr Warmington has said that the term 'systemic' can  
16 only be used when referring to a constant fault, and  
17 that is why the report said there were no systemic  
18 faults.

19 "However, he says the report clearly said there were  
20 circumstances where a combination of factors could lead  
21 to a fault in the system which could account for some of  
22 the discrepancies which have resulted in civil and  
23 criminal proceedings against [the postmasters].

24 "[Could I have] a response ..."

25 Then if we scroll up, please. That gets forwarded

55

1 questions?

2 **A.** I can't speak for Post Office. I'm --

3 **Q.** The people with whom you dealt within the Post Office?

4 **A.** I don't recall that, no. I mean we were being asked  
5 questions and I'm sure other people were as well.

6 **Q.** Was it a common view within the Post Office that focus  
7 should instead be asking the defence lawyers why their  
8 clients pleaded guilty and why they've not tried to  
9 appeal?

10 **A.** I'm sorry, could you repeat that?

11 **Q.** Was it a common view within the Post Office that the  
12 focus should instead be on asking defence lawyers why  
13 their clients pleaded guilty and why they had not tried  
14 to appeal?

15 **A.** Again, I don't think I'd -- I don't know who else was in  
16 Post Office but that's not something I was turning my  
17 mind to, I don't think.

18 **Q.** Was there a view, an attitude of mind, that the Post  
19 Office was being got at by subpostmasters and the media?

20 **A.** Maybe not by postmasters but I think it is probably fair  
21 to say we were feeling a little bit "got at" by the  
22 media. I think that's fair.

23 **Q.** Can we move on to POL00152777, please, the next tab,  
24 E92. Look at the second page, at the foot of the page  
25 and, if we just scroll down a little bit, we can see who

54

1 by Melanie Corfield to some people not including you,  
2 and then gets forwarded by Mark Underwood of the  
3 Complaint Review and Mediation Scheme to you and, if we  
4 scroll up, please -- keep scrolling -- if we go to the  
5 top of the page, you say:

6 "... I'm uncomfortable with the final sentence."

7 We'll look at what that is in a moment:

8 "I know we've used it in a draft [Panorama]  
9 statement, but I want to think on it overnight to make  
10 sure the line both the Shropshire Star and [Panorama]  
11 properly covers the [two] bugs we identified for [Second  
12 Sight], which did affect ... balances."

13 So if we scroll down, please. You see in the bold  
14 text there the proposed reply that Ms Corfield was going  
15 to give back to the Shropshire Star, and you had said  
16 you were uncomfortable with the final sentence, despite  
17 it being used previously. The final sentence is "This  
18 work" -- that's over three years there have been  
19 exhaustive investigations into a very small number of  
20 complaints:

21 "This work has provided overwhelming evidence that  
22 the computer system was not responsible for the missing  
23 money in these Post Office branches."

24 Why were you uncomfortable with using the sentence,

25 "This work has provided overwhelming evidence that the

56

1 computer system was not responsible for any missing  
 2 money"?

3 **A.** I think the use of "overwhelming" is a very, very high  
 4 bar and it's not an exact one but a very high one, and  
 5 we should be trying to make sure that we don't make  
 6 statements that can't be substantiated, corroborated or  
 7 defended.

8 **Q.** Would a simpler explanation for you being uncomfortable  
 9 with that final sentence be that it wasn't true?

10 **A.** No, I don't know that it wasn't true. As I say, it was  
 11 just a very high bar and capable of different  
 12 interpretations. This is a media line, I think, and I'm  
 13 naturally -- sorry, I'm cautious, it's -- you're being  
 14 hostage to fortune when you set your stall out that  
 15 high.

16 **Q.** So it was the strength with which the sentence was  
 17 expressed rather than the substance of what was being  
 18 said that you were uncomfortable with?

19 **A.** Also, I guess, the conclusion, you know. I'm not sure  
 20 that that would necessarily have led to that. I'm not  
 21 sure it didn't. I just think it is -- it was too  
 22 uncertain. I think -- well -- or potentially  
 23 indefensible.

24 **Q.** Was it because, by August 2015, this is a matter we'll  
 25 look at later today and maybe tomorrow morning, that you

57

1 Trust."

2 What were the numerous opportunities that the Post  
 3 Office had offered to the BBC that would have  
 4 facilitated a fairer programme?

5 **A.** Do you know who the author of this is? I only received  
 6 it quite late.

7 **Q.** It's unattributed.

8 **A.** Okay, thank you. I think there are two offers that  
 9 I can remember, one was initially for a talking-head  
 10 interview, so live-to-camera interview, and another was  
 11 to share some material from a file relating to  
 12 a particular contributor to the programme.

13 **Q.** Was it those two points that led to the view that the  
 14 Panorama programme was unbalanced and misleading or was  
 15 it about the content too?

16 **A.** No, it was definitely the content too.

17 **Q.** It was the content too?

18 **A.** Yes.

19 **MR BEER:** Thank you.

20 Sir, that's an appropriate moment to break, please.

21 Can we break until 11.30, please?

22 **SIR WYN WILLIAMS:** Yes, of course, thank you very much.

23 **MR BEER:** Thank you.

24 **(11.16 am)**

**(A short break)**

59

1 knew that the work of Second Sight hadn't provided  
 2 evidence, let alone overwhelming evidence, that the  
 3 computer system wasn't responsible for missing money?

4 **A.** Sitting now, I can't say that that's a connection but it  
 5 may have been.

6 **Q.** Okay, I'll move on. POL00113008. This is tab E65.

7 **A.** E65?

8 **Q.** Yes.

9 **A.** Thank you.

10 **Q.** This a chronologically of the Complaint Review and  
 11 Mediation Scheme, I think produced by the Post Office  
 12 itself. Can we go, please, to page 13. Four boxes from  
 13 the top, there is a reference to a meeting on  
 14 4 September 2015, between you, Mark Davies and the BBC's  
 15 most senior executive, James Harding, and the chronology  
 16 records that:

17 "At that meeting Post Office acknowledged the  
 18 legitimate public interest in scrutiny of the Post  
 19 Office, including the BBC. Nevertheless Post Office  
 20 made the point that the Panorama programme was  
 21 unbalanced and misleading in its presentation of the  
 22 facts, and that the BBC failed to take up the many  
 23 opportunities the Post Office had offered which would  
 24 have facilitated a fairer programme [and it] reserves  
 25 [the] right to make a formal complaint to the ...

58

1 **(11.30 am)**

2 **MR BEER:** Good morning, sir. Can you continue to see and  
 3 hear us?

4 **SIR WYN WILLIAMS:** I can, thank you.

5 **MR BEER:** Thank you very much.

6 Mr Williams, just one last document, please on this  
 7 topic of media relations.

8 **A.** Thank you.

9 **Q.** POL00232517, and that's at E104.

10 **A.** 104, thank you.

11 **Q.** If we just look at the top of page 3 to get the context,  
 12 there's an email from Mark Davies to you and others  
 13 referring to that meeting that we looked at before the  
 14 break:

15 "Rod and I met James Harding, BBC Director of News  
 16 and Current Affairs, and Ceri Thomas, Editor of Panorama  
 17 today as you know. The BBC's Head of Complaints also  
 18 attended.

19 "It was useful to have the opportunity to land our  
 20 points about the BBC approach and the reality of the  
 21 cases featured. I am really grateful to [you] for  
 22 attending and his excellent support, and Mel for her  
 23 pack.

24 "[Mr] Harding listened and responded positively  
 25 without making any commitments, as we would expect. But

60

1 we have landed key points."

2 If we go to page 2, please. If we scroll down to  
3 later on 4 September, Mark Davies says:

4 "I would like to review the complaint again ..."

5 This is the complaint against the BBC that was being  
6 formulated:

7 "... actually to make it even more comprehensive.

8 I think we need to formally note the views and  
9 involvement of Nick Wallis."

10 Then over the page to page 1, at the foot of the  
11 page -- that's it. Mr Davies says on an email sent to  
12 Susan Barty and copied to you:

13 "... I think we should build out a section [this is  
14 in the complaints letter] on Nick Wallis' involvement  
15 in. In a nutshell I would be looking to say that (a)  
16 Mr Wallis has clear views which threaten BBC  
17 impartiality (b) this point is underlined by the BBC  
18 previously requesting that he remove a blog post on this  
19 issue (c) we were not informed that he was involved in  
20 Panorama, which seems a breach of good faith and (d) we  
21 know he was involved because he had boasted about it on  
22 his Facebook page. In adding this point I think we  
23 should provide examples (Mel has them) outlining where  
24 he has gone, on his blog, beyond journalism and into  
25 campaigning against [the Post Office].

61

1 **A.** Yes, I probably was, yes.

2 **Q.** Can we turn to a different topic, please, and that's  
3 your relationship with external legal advisers. That  
4 can come down for the screen.

5 By 2016, you had been legally qualified for  
6 21 years; is that right?

7 **A.** I think so, yes.

8 **Q.** You'd been admitted as a solicitor in this jurisdiction  
9 for 14 of those years?

10 **A.** 2016, that would be correct, yes, plus or minus.

11 **Q.** You were, by that time, specialised and expert in civil  
12 litigation?

13 **A.** I certainly had experience and, obviously, 16 years of  
14 it in civil litigation. There's always a somebody more  
15 expert than me in this field, I've found.

16 **Q.** Can we look, please, at POL00038852, that's B260, if you  
17 want to look at it. This is, if we just scroll down to  
18 the foot of the page, an email from Amy Prime, who was  
19 a solicitor at Bond Dickinson and, if we go to the top  
20 of the page, please, we can see it's her email to you of  
21 10 May 2016, copied, amongst other people, to Andrew  
22 Parsons, the partner at Bond Dickinson?

23 **A.** Can I just check something. I don't think that date is  
24 correct. I think they is -- we struggled to find this,  
25 and I think -- I'm happy to be corrected by somebody --

63

1 "I would also use this letter to formally question  
2 why when approaching contributors, the BBC has never  
3 featured the views of the NFSP. Even if the NFSP has  
4 declined approaches, there is on the record footage of  
5 George Thomson talking about the issue."

6 At this stage, did you agree Mr Wallis held views  
7 that threatened the impartiality of the BBC?

8 **A.** That's -- those aren't my words, no.

9 **Q.** That's why I was asking you whether you agreed that  
10 Mr Wallis held views that threatened the impartiality of  
11 the BBC?

12 **A.** I didn't hold that view. I didn't turn my mind to  
13 whether they did or didn't.

14 **Q.** Did you turn your mind to whether or not the BBC had  
15 acted or not acted in good faith?

16 **A.** Not on good faith, no. I didn't turn my mind to those  
17 concepts.

18 **Q.** Was there a kind of bunker mentality amongst the senior  
19 leadership in the Post Office in relation to Horizon and  
20 the media's treatment of it?

21 **A.** I don't know that I can speak for senior management but  
22 I do think, certainly from where I was sitting, it did  
23 feel a bit bunker mentality, yes. I can't speak for the  
24 senior executives.

25 **Q.** Were you in the bunker?

62

1 I think that it's using the American date referencing so  
2 I think it's 5 October.

3 **Q.** Okay, fine.

4 **A.** That becomes -- sorry, I beg your pardon, I just wanted  
5 to -- and, if I'm wrong about that, I apologise but  
6 that's my understanding.

7 **Q.** In any event, in 2016, either in the summer or autumn,  
8 Amy Prime, a solicitor at Bond Dickinson, was emailing  
9 you with a request for instructions on a request for  
10 disclosure in relation to Post Office's Investigation  
11 Guidelines, yes?

12 **A.** Yes.

13 **Q.** Can we look at the email, please. She says in the  
14 email -- and I should say that Ms Prime, who was then  
15 recently qualified, had sent a draft of this email to  
16 the partner Andrew Parsons first and he contributed to  
17 the drafting of it. Documents that the Inquiry has make  
18 that clear and that's a matter we will take up with  
19 others later in the phase.

20 In any event, Ms Prime says:

21 "Freeths have requested that we provide them with  
22 Post Office's Investigation Guidelines since 1998  
23 (including any revisions to date). In the earlier round  
24 of disclosure we did not provide the guidelines since we  
25 wished to confirm whether the documents were covered by

64



1 privilege. Brian Altman has confirmed that they will  
2 not be covered by privilege and as such the guidelines  
3 will, at some point, have to be disclosed.

4 "We have reviewed both the most recent version of  
5 the guidelines (which were adopted in January 2016) and  
6 the prior version (which were adopted in August 2013).  
7 Of note, the 2013 version (attached, password ..."

8 Then, if you scroll up, please, you can see that  
9 there is, indeed, "Conduct of Criminal Investigation  
10 Policy v2 300813", as an attachment. Scroll back down:

11 "Of note, the 2013 version (attached ...) provides  
12 'Should the recent Second Sight review be brought up by  
13 a subject or his representative during a PACE interview  
14 the Security Manager should state: "I will listen to any  
15 personal concerns or issues you may have had with the  
16 Horizon system during the course of this interview".'

17 "Freeths will more than likely use this statement as  
18 an opportunity to confirm that the Post Office has  
19 responded to postmasters using stock answers (a point  
20 which has already been raised in relation to the  
21 helpline) and further could be spun to show that Post  
22 Office was not taking issues with Horizon seriously and  
23 were trying to ignore any issues which were raised.

24 "Although we may face some criticism later on, we  
25 are proposing to try and suppress the guidelines for as

65

1 **Q.** Secondly, that suppression should be done in a way that  
2 looked legitimate to the outside world, agree?

3 **A.** Yeah, that's what it says, yes.

4 **Q.** And, third, that you were to say if you disagreed that  
5 disclosure should be suppressed but, at the same time,  
6 be made to look legitimate to the outside world?

7 **A.** Quite -- I don't think it quite says that but that's  
8 certainly the gist, yes.

9 **Q.** There's no record of you saying that you did disagree,  
10 saying, "Don't do that, it's wrong", is there?

11 **A.** There's no record -- as I say, I think say this in my  
12 statement, I did not recall -- I have no recollection of  
13 this email, which is regrettable, because I was --

14 **Q.** Are you used to getting emails from other lawyers  
15 saying, "We should suppress documents"?

16 **A.** I'm used to getting a lot of emails. As I say, I don't  
17 recall reading this at the time. It was clearly sent to  
18 me, it was clearly addressed to me but I do not recall  
19 and the reason why I mention the date is, when the  
20 Inquiry provided this to me, I'll be frank and say it's  
21 a concerning email. I --

22 **Q.** You searched your emails like frantic, no doubt, didn't  
23 you?

24 **A.** I did and I couldn't find anything around it until the  
25 dates were swapped and I looked around October and

67

1 long as possible on the grounds that the most recent  
2 version is not relevant since it post-dates the  
3 investigations complained of and it would require a full  
4 disclosure exercise to piece together all historic  
5 revisions of the guidelines. We thought it would be  
6 best to bring this to your attention early.

7 "For now, we'll too what we can to avoid disclosure  
8 of these guidelines and try to do so in a way that looks  
9 legitimate. However, we are ultimately withholding  
10 a key document and this may attract some criticism from  
11 Freeths. If you disagree with this approach do let me  
12 know. Otherwise, we'll adopt this approach until such  
13 time as we sense the criticism is becoming serious.

14 "If you would like to discuss ... please don't  
15 hesitate to call."

16 So, your solicitors had both the 2013 and the 2016  
17 versions of the investigations guidelines, yes.

18 **A.** That's what it seems like, yes.

19 **Q.** Indeed, they attach the 2013 version to the email, yes?

20 **A.** That's what it shows, yes.

21 **Q.** They made a proposal that was essentially summarising  
22 threefold: firstly, that the Post Office should, through  
23 its lawyers, suppress disclosure for as long as  
24 possible; do you agree?

25 **A.** That's what it says, yes.

66

1 I did, indeed, receive it. It was in my inbox.

2 **Q.** And you didn't reply to it?

3 **A.** No, I --

4 **Q.** You didn't say, "no, don't do that"?

5 **A.** I did not reply to it but I do not recall reading it  
6 carefully. I don't recall it in any size, shape or  
7 colour.

8 **Q.** Your actions are the more important thing rather than  
9 your present recollection?

10 **A.** That's true, mm-hm.

11 **Q.** What we can say is that you didn't reply --

12 **A.** Correct.

13 **Q.** -- saying "No, lawyers shouldn't suppress relevant  
14 documents, they shouldn't do so in a way that is made to  
15 look legitimate, and they certainly shouldn't do so  
16 because the content of the document is concerning and  
17 might be used by our opponent to make a good argument  
18 against us". You didn't do any of those things, did  
19 you?

20 **A.** No, it's -- I certainly didn't reply in writing. I --  
21 as I say, I don't recall. I don't recall calling,  
22 either, which is the invitation there. I don't recall  
23 any action on this so, no, I did not take any action in  
24 response to this.

25 **Q.** Had the Post Office given Bond Dickinson instructions to

68

1 take an approach like this generally to disclosure,  
 2 ie a rigid hard line approach to disclosure?  
 3 **A.** No, we had not -- I do recall at many stages --  
 4 disclosure was a quite a big issue, as I think does  
 5 become clear through -- hopefully it comes through  
 6 through some of my evidence, and it was a challenge for  
 7 Post Office because we held most of the documents and  
 8 we'd be doing the lion's share of the disclosure and,  
 9 like all large disclosure exercises, it's a challenge  
 10 for the claimant to have an idea of what you have but  
 11 don't know quite what it is because they don't have it.

12 Andy and I used to talk about, well, if we couldn't  
 13 do something what else could we offer that would  
 14 approximate it? We'd say the "no, but" approach.  
 15 That's the recollection that I have of our approach to  
 16 the disclosure to it and, as I say, this is inconsistent  
 17 with that, I accept that, which is why I find it odd.

18 **Q.** Why was the Post Office suppressing disclosure of  
 19 documents, which it considered may harm its defence?

20 **A.** Well, the reasons being advanced are in the email.  
 21 I think this was made before formal disclosure orders so  
 22 this was in pre-action stage but --

23 **Q.** But they'd asked for this. They'd asked for, I think,  
 24 30-odd classes of material and one of them was  
 25 investigation guidelines. This had been identified, the

69

1 an excuse because that's what would have been desirable,  
 2 the first line is it says it's not urgent, to consider  
 3 as and when you get a chance, and, as I say, I do recall  
 4 I was dealing with something very urgent at the time  
 5 but, sitting here today, I'd like to say I did that, but  
 6 I didn't, sir --

7 **SIR WYN WILLIAMS:** But I'm right, aren't I: there should  
 8 have been a prompt reply and it should have been --

9 **A.** Yes.

10 **SIR WYN WILLIAMS:** -- "You can't possibly do that"?

11 **A.** Yes, your Honour.

12 **SIR WYN WILLIAMS:** Fine, thank you.

13 **MR BEER:** There's another view of it, the penultimate  
 14 paragraph that says, "If you disagree, you must get in  
 15 touch"?

16 **A.** Yes.

17 **Q.** So it was like a negative resolution, "we're going to do  
 18 this, unless you pipe up"?

19 **A.** Um --

20 **Q.** And you didn't disagree?

21 **A.** I did not disagree.

22 **Q.** Thank you. Can we move on.

23 POL00043169. That's E37. Again, I'm still on the  
 24 topic of dealing with external legal advisers. Just  
 25 a bit of context before we dive in. We're now many

71

1 2013 version, as containing a passage that might harm  
 2 the Post Office's defence. That's the only reason given  
 3 for not disclosing it.

4 **A.** That's what I've seen there, yes.

5 **Q.** Is that a legitimate reason for not disclosing  
 6 a document, that it might harm your defence?

7 **A.** Not to me, it's not, and I would hope that wasn't my  
 8 view then, either. I don't believe it was but, as  
 9 I say, I don't recall any reaction to this.

10 **Q.** Did you enjoy such a close relationship with your  
 11 solicitors in the Group Litigation that it was perfectly  
 12 acceptable openly to discuss the suppression of  
 13 disclosure and covering it up by making it seem  
 14 legitimate in emails of this kind?

15 **A.** I have to say, no, and this is inconsistent with most of  
 16 my dealings on this matter with our solicitors.

17 **Q.** But you didn't do anything to pull Bond Dickinson up on  
 18 this, did you?

19 **A.** On this, no.

20 **Q.** Can we move on, please.

21 **SIR WYN WILLIAMS:** In reality, Mr Williams, this email  
 22 should have had a prompt response from you to the effect  
 23 of "You can't possibly do that"; that's right, isn't it?

24 **A.** That's what I'd like. When I looked at this, it is  
 25 quite possible -- and I offer this in no way as

70

1 years later in October 2019, and the Post Office had  
 2 managed to conduct the Horizon Issues Trial, which was  
 3 concerned with whether there were known errors in  
 4 Horizon, without disclosing to the claimants and to the  
 5 court many important Known Error Logs, okay?

6 **A.** All right, thank you.

7 **Q.** Can we turn to page 4, at the bottom, please. We can  
 8 see your email of 19 October:

9 "Ben [this is to Mr Foat],

10 "Please find an updated Board update. Set out below  
 11 are the key notes to address the points from your email  
 12 on 'what would it take to get all of [the KEL review]  
 13 done by next week', and 'what is the scope [of a Fujitsu  
 14 audit] that would diminish the risk [of creating  
 15 documents that would then need to be disclosed to the  
 16 claimants]'."

17 Then reading on:

18 "Generally ...

19 I'm afraid there's some text in here, in the email  
 20 we've been provided that makes it harder to read but  
 21 I think we can get the sense to it. You say:

22 "... I have stressed (firmly) to the HSF and [Womble  
 23 Bond Dickinson] teams the importance of this workstream.  
 24 It's being escalated to Alan Watts at HSF and Tom Beezer  
 25 at [Womble Bond Dickinson] to make sure our Board's

72

1 requirements are met", and they were both cc'd.  
 2 "The key legal risk here is the ongoing duty in the  
 3 GLO litigation to disclose adverse documents, which may  
 4 not exist (or which we may not have been aware of) but  
 5 for taking the action now contemplated, especially in  
 6 the context of material, we had not previously seen."  
 7 Then under the headed in "New KELs", you say:  
 8 "[Womble Bond Dickinson] are assessing the risk over  
 9 the weekend of the 94 newly disclosed high risk KELs.  
 10 By the middle of [the] week, Counsel will have reviewed  
 11 these KELs in detail and given a view on whether they  
 12 are likely to cause the Horizon trial to be  
 13 recommended/the judgment delayed (the Counsel team being  
 14 best placed to identify the impact they may have on the  
 15 trial they conducted)."  
 16 So trial over 94 high-risk KELs that had been newly  
 17 disclosed after the evidence had finished and counsel  
 18 were looking at "Are we going to have to recommence the  
 19 trial, ie here's some more evidence, or ask the judge to  
 20 delay giving judgment?"  
 21 Then:  
 22 "In relation to the other KELs not used at the trial  
 23 (ie the majority of the around 14,000 new KELs), the key  
 24 risk of reviewing these is that claimants have not yet  
 25 asked for the documents, so by reviewing them now we are

73

1 **A.** No -- sorry, I -- I want to make sure I'm saying no to  
 2 the right thing. We -- that was not my understanding of  
 3 our approach to disclosure in the litigation.  
 4 **Q.** Was it your approach to disclosure of the Known Error  
 5 Logs, the around 14,000 of them, at this stage?  
 6 **A.** No, it -- well, it depends. Are you talking -- which --  
 7 are you talking about the new KELs or the --  
 8 **Q.** I'm talking about the 14,000 that were not the 94  
 9 high-risk ones that had been disclosed?  
 10 **A.** I'm sorry, I'm confusing myself. Sorry, could you ask  
 11 the question again, please?  
 12 **Q.** Yes. Was it then your approach that, in relation to  
 13 those 14,000 Known Error Logs, a relevant consideration  
 14 was whether the claimants had asked for them or not?  
 15 **A.** In trying to work out what Post Office was to do with  
 16 these, clearly thought it was a relevant consideration.  
 17 **Q.** Why is that a relevant consideration?  
 18 **A.** Is it something that the business wants to do?  
 19 **Q.** In law, why is it a relevant consideration?  
 20 **A.** Sorry, I'm losing you. What is it that the -- the  
 21 claimants do it or not? We'd had -- we'd operated -- so  
 22 we have a duty to disclose adverse documents. That's my  
 23 understanding.  
 24 **Q.** Can you discharge that duty without looking at the  
 25 documents?

75

1 doing the claimants' work for them.  
 2 "The legal advice therefore is we should not review  
 3 the 14,000 other KELs unless the claimants ask for them  
 4 or counsel's review of the 94 high-risk KELs warrants  
 5 a wider review."  
 6 Then if you just read the next couple of bullet  
 7 points to yourself.  
 8 Then under "Audit", at the end:  
 9 "The best way to mitigate the risk of generating  
 10 adverse/disclosable documents through an audit is to  
 11 keep it focused on Fujitsu's Litigation Support provided  
 12 to date, with any operational audit to follow once the  
 13 litigation has been resolved and its associated  
 14 disclosure duties [continued]."  
 15 You'll see that, in the course of the legal advice  
 16 that you gave to Mr Foat there, you said that, in  
 17 relation to the 14,000-odd new KELs, there was a risk,  
 18 if Post Office reviewed them, that you were doing the  
 19 claimants' work for them because the claimants hadn't  
 20 yet asked for those documents, yes?  
 21 **A.** Yes, that's what that says.  
 22 **Q.** Was that an approach that you took to disclosure  
 23 generally: unless the other side asks for a document,  
 24 there is no need to review your own material to see  
 25 whether it meets the test for disclosure?

74

1 **A.** I suspect it would be difficult to.  
 2 **Q.** And that's what you were proposing not to do?  
 3 **A.** But I don't think that's necessarily -- because the  
 4 disclosure was focused to whatever had been ordered.  
 5 We --  
 6 **Q.** None of this had been ordered --  
 7 **A.** But across the entire business not every corner was  
 8 turned. But you'll also see -- so doing the claimants'  
 9 work for them, I'm trying to think why I said that --  
 10 **Q.** Let's have the document back up on the screen.  
 11 **A.** I have it in front of me.  
 12 **Q.** POL00043169. Under "New KELs", second bullet point.  
 13 First bullet point you deal with the 94 that have  
 14 already been disclosed and counsel are assessing whether  
 15 this is going to cause some rather catastrophic  
 16 consequences for the trial that's already taken place.  
 17 **A.** Yes.  
 18 **Q.** Second bullet point:  
 19 "In relation to the other KELs [the 14,000-odd] the  
 20 key risk of reviewing [them] is that the claimants have  
 21 not yet asked for [them] by reviewing them ... we are  
 22 doing the claimants' work for them."  
 23 My question is really simple. You were suggesting  
 24 that there's no need to review your own material to see  
 25 whether it met the test for disclosure, weren't you?

76

1 A. That's the -- I'm also saying that -- so that seems --  
2 on the next bullet point, that seems to be supported by  
3 legal advice and I'd like to -- I don't remember that  
4 advice but that's the sort of thing I'd like to refresh  
5 myself on because it seems to underpin what the  
6 statement above it is and I'm afraid I don't recall it.

7 Q. So you are saying that the next bullet point, the legal  
8 advice, is not referring to the legal advice that you  
9 are here giving in this email. It's referring to  
10 somebody else's legal advice that you're regurgitating?

11 A. Quite possibly. I'm struggling with the -- and I've  
12 highlighted it, so I've clearly brought it to the  
13 attention. I'm trying to work out now why I wrote that  
14 in the way I did, and I'm -- I think I say sort of quite  
15 often when I do it -- and in a circumstance like this  
16 it's highly likely I'd have been doing it -- is that  
17 this issue of the new late-found KELs was pretty  
18 alarming and generated a lot of activity and requests  
19 for information to understand what was going on.

20 You can see we'd instructed it looks -- it sounds  
21 like counsel plus two law firms were engaged on it.  
22 I would have been -- and I think this is -- sort of  
23 looking at this email, I remember the time. I don't  
24 remember drafting this email but I remember the time.  
25 I would have been trying to find out what's happening,

77

1 so that our associated disclosure duties have  
2 concluded"?

3 A. Yes, I do say that.

4 Q. So what you're saying, whether yourself or in  
5 synthesising the views of others, is, "Don't look at  
6 14,000 new KELs, because they might contain material  
7 that's adverse to our case and, in that respect, we  
8 would it be doing the claimants' work for them. Instead  
9 wait until the litigation is over and our disclosure  
10 duties have passed, then conduct an operational audit".

11 A. That is what it says. Although, looking at that, it  
12 wouldn't have closed off any disclosure duties, as  
13 I understood them, in any --

14 Q. Why does it say, "Wait until the litigation has been  
15 resolved and its associated disclosure duties concluded",  
16 then?

17 A. I agree, that's what it says.

18 Q. Can you help us with this at all, please?

19 A. I'm sorry, what's the question, please.

20 Q. It appears to suggest that the Post Office's suggested  
21 approach from its lawyers, either from you or  
22 communicated through you, is that we shouldn't look at  
23 documents that might contain adverse material because we  
24 might have to disclose them; instead, let's wait until  
25 the litigation is over and our duties of disclosure have

79

1 what needs to happen and synthesise that into digestible  
2 bullet points for people to understand the position so  
3 that we either proceed with known risks, with knowledge  
4 of the known risks, or decide not to do things with  
5 knowledge of those risks, as well.

6 So on the -- when I say the legal advice, my guess  
7 is -- and I'm sorry, again, I can't remember the  
8 specifics -- but being told not to do it, I think, will  
9 have come from a collection of the lawyers involved,  
10 which includes me, as well as the external lawyers.

11 Q. I take it if this advice does originate from others,  
12 it's not advice that you disagreed with?

13 A. I mean, quite clearly, if we were reviewing it, we would  
14 be doing the claimants' work for them. As soon as we  
15 reviewed, we would see something; if it was adverse, we  
16 had duty to disclose it, so that's --

17 Q. Isn't that a reason to do something, rather than not to  
18 do it, in the legal system?

19 A. I'm not sure. I'm not sure. It would depend on the  
20 circumstance and I'm thinking, in this circumstance, it  
21 seems to have been suggested that that was acceptable.

22 Q. When you take it together with the final bullet point  
23 under "Audit" about mitigation of risk, you say,  
24 essentially, "Before we look at these KELs, before we  
25 audit them, we should wait for the litigation to be over

78

1 ceased to arise.

2 A. That's what it says. I'm sorry, I'm missing your  
3 question. I'm sorry, I'm being thick.

4 Q. Do you think that's appropriate?

5 A. I'm saying it's a way to mitigate the risk.

6 Q. Risk of what: disclosing adverse documents?

7 A. My understanding -- and I'm happy to be corrected -- my  
8 understanding of civil litigation is the duty of  
9 disclosure in the litigation ends with the litigation.  
10 Once the litigation concluded, we didn't have a duty to  
11 disclose to Freeths --

12 Q. That's why you have to discharge the duty in the  
13 litigation before it's concluded?

14 A. But that is what was -- that work was being  
15 undertaken -- that work was being undertaken. It's  
16 a question of how far you go with it.

17 Q. Thank you. That can come down.

18 **SIR WYN WILLIAMS:** Before it does, Mr Beer, I just want  
19 to -- I may be being wholly, unduly pedantic but there's  
20 something itching away at me. Could you put it back up  
21 again, please, that document. Just so I've understood  
22 the timing of this, Mr Williams, the Horizon Issues  
23 Trial had taken place but the judgment had not been  
24 given, so within that time period; is that correct?

25 A. That's my understanding, sir.

80

1 **SIR WYN WILLIAMS:** Right now the word "disclosure" may have  
2 more than one meaning in the context I'm talking about  
3 but in civil litigation you give disclosure by producing  
4 a list of documents. You don't actually begin by simply  
5 sending the other side a bundle of documents, do you?  
6 You actually produce a list to notify them of what you  
7 had?

8 **A.** That's correct, sir. That's my understanding.

9 **SIR WYN WILLIAMS:** Right. Now, in relation to these 14,000  
10 KELs, which are described in this document as "new  
11 KELs", had they ever been listed either in a formal list  
12 or referred to in a letter to the claimants' lawyers to  
13 notify them that they existed.

14 **A.** My understanding is that had had happened, sir, that had  
15 happened fairly promptly upon been notified of these.

16 **SIR WYN WILLIAMS:** Right. So that I'm not misunderstanding  
17 what's gone on, you are telling me that the existence of  
18 these documents had not been hidden from the claimant  
19 but nobody had looked at them to gauge their relevance;  
20 is that it?

21 **A.** Almost it, sir. Looking at this, that is correct that  
22 they are notified. It's my understanding, that --  
23 I only received this document, which is -- it wasn't  
24 referred to my Rule 9 Request, so I haven't looked  
25 around this as I have some of the other issues, so this

81

1 by Simon Baker to find out whether Horizon bugs had been  
2 referred to in any previous court actions, in  
3 anticipation of the publication of the Second Sight  
4 Interim Report. This led me to put this question to  
5 [Womble Bond Dickinson] and DAC Beachcroft, given that  
6 to the best of my knowledge they were the [Post Office]  
7 external lawyers most likely to have supported [the Post  
8 Office] in any civil action.

9 "This activity made clear to me that Horizon bugs  
10 had been discussed in two court cases, namely the 2007  
11 civil case of *Post Office v Castleton* and the  
12 prosecution of Seema Misra. In the context that I was  
13 looking at them in mid-2013 however, there was no reason  
14 for me to look into this further. That was because the  
15 cases had concluded quite sometime earlier and there  
16 were no indications from those I was supplying the  
17 information to that anything further was required."

18 So, essentially, you're saying in mid-2013 you had  
19 cause to enquire about past cases and that enquiry had  
20 led you to two cases in which Horizon bugs had been  
21 discussed: Lee Castleton and Seema Misra?

22 **A.** Correct.

23 **Q.** Can we look, please, at POL00117614 -- that's E68 -- and  
24 turn to pages 3 and 4, please. If we just look at the  
25 end of 4, we can see it's signed off "Tim", and if we go

83

1 is my understanding with that caveat. It's my  
2 understanding is --

3 **SIR WYN WILLIAMS:** Right, so that the Inquiry can satisfy  
4 itself if it wants to about this, what you are, in  
5 effect, telling me is that there will be a document in  
6 existence which shows that the solicitors acting for the  
7 claimants were notified of the existence of these 14,000  
8 documents?

9 **A.** I sincerely hope so because that is my understanding,  
10 sir, and then --

11 **SIR WYN WILLIAMS:** All right, that's fine. Thank you very  
12 much. That's your understanding and we'll see in due  
13 course where we go from there. Thank you.

14 **MR BEER:** Thank you, sir. I think that document can come  
15 down now.

16 Can we turn, please, to your view of subpostmasters  
17 and turn up paragraphs 44 and 45 of your witness  
18 statement, please.

19 **A.** 44 and 45 was that?

20 **Q.** Yes. You say:

21 "I have been asked to comment on some 1 July 2013  
22 emails concerning the 'Callendar Square bug' (sometimes  
23 called the 'Falkirk' bug). These events happened over  
24 10 years ago, so I do not now have a firm recollection  
25 of how they unfolded. As far as I recall, I was asked

82

1 back to page 3, we can see it's an email from Tim  
2 McCormack to Paula Vennells with the subject "It had to  
3 happen sooner or later", and it was sent on 14 October  
4 2015.

5 I should say this is one of a number of emails  
6 Mr McCormack sent directly to Ms Vennells in October  
7 2015 regarding errors in Horizon. He says:

8 "This may be the last you hear from me directly.

9 "It is a last chance for you to accept what I have  
10 been telling you these last few years is true.

11 "I now have clear and unquestionable evidence of  
12 an intermittent bug in Horizon that can and does cause  
13 thousands of pounds losses to subpostmasters.

14 "Tonight there is a branch in your network sitting  
15 on a loss of 5 figures. The money does not exist. It  
16 is as a result of several one sided transactions being  
17 entered erroneously by the system not of the operator.

18 "I have documentation from [Post Office] employees  
19 acknowledging the error and that is has happened before.

20 "I have the source documentation from the  
21 subpostmaster concerned.

22 "I have evidence of a similar event happening two  
23 years ago. It is also documented. I have a limited  
24 channel of contacts in the Industry. Two similar events  
25 (plus the admission by your employee that he is aware of

84

1 other events) is a high percentage, and the error soon  
 2 to be exposed will result in more coming to light.  
 3 "Most importantly it is an error that would not be  
 4 noticed by many subpostmasters and could well be the  
 5 reason for many of the JFSA cases.  
 6 "I have three options.  
 7 "(a) this email is the first option -- appeal to  
 8 your sense of decency and compassion to accept that many  
 9 of the claimants in the JFSA [saga] are honest and  
 10 decent citizens whose lives were destroyed by your  
 11 organisation.  
 12 "(b) go to the press and see what happens.  
 13 "or  
 14 "(c) await the inevitable judicial review where you  
 15 will personally be exposed and perhaps leave yourself  
 16 open to criminal charges.  
 17 "We can stop this farce now. You can wake up and  
 18 realise that the people you rely on to tell you the  
 19 truth about what is happening don't have the ability to  
 20 do so.  
 21 "Option (b) happens on Friday. I have one former  
 22 [subpostmaster] who is keen to proceed with a JR.  
 23 Option (c) could happen sooner than you think.  
 24 "You have two options:  
 25 "(a) ignore this email and accept the consequences  
 85

1 Nick Wallis, Sandip Patel QC, Professor Button).  
 2 "I have sent those letters in the past and am happy  
 3 to do so again. I'm also pretty sure I know about the  
 4 JR he's referring to, and I have already sent a holding  
 5 letter to that former [postmaster] acknowledging receipt  
 6 of his complaint, so my name might be known to Tim  
 7 already.  
 8 "If you agree, I'll circulate something shortly.  
 9 I'll want to send it hard copy ...  
 10 "Generally, my view is that this guy is a bluffer,  
 11 who keeps expecting us to March to his tune. I don't  
 12 think we should do so, but instead respond with  
 13 a straight bat."  
 14 Mr Davies agrees at the top saying:  
 15 "Thanks Rod -- wise advice with which I agree."  
 16 By this time, October 2015, you acknowledge, we saw  
 17 in your witness statement, that you were aware of  
 18 suggestions that there were bugs in Horizon arising from  
 19 your knowledge of the *Seema Misra* case and the *Lee*  
 20 *Castleton* case, yes?  
 21 **A.** Correct.  
 22 **Q.** The Second Sight Report, the interim report and its  
 23 second report, had been published by now, hadn't they?  
 24 **A.** Yes.  
 25 **Q.** Why did you think Mr McCormack was a bluffer?  
 87

1 "(b) travel with me to the branch in question. See  
 2 for yourself the evidence. Talk to the subpostmaster  
 3 concerned and reach your own conclusion. I want nothing  
 4 out of this and will meet my own costs."  
 5 If we look at the foot of page 2, one of the  
 6 Executive Assistants to Paula Vennells sends the email  
 7 on to Angela van den Bogerd and others:  
 8 "Please see email from Tim. Can you advise what  
 9 action we need to take?"  
 10 Further up the page, Angela van den Bogerd sends it  
 11 to Mr Davies and to you:  
 12 "Mark, Rod,  
 13 "My view is that we should ask Tim to share the  
 14 information with us so that we can make an informed  
 15 decision on how to proceed."  
 16 So actually taking up, essentially, part of option  
 17 (a), agreed?  
 18 **A.** Yes.  
 19 **Q.** "I would suggest this is probably best coming from Paula  
 20 in the first instance."  
 21 Then over the page, your reply:  
 22 "Thanks Angela. I agree we should ask for the  
 23 information, but recommend that we write to him in the  
 24 same terms that we have every other person who has said  
 25 they have evidence of flaws (Kay Linnell, Second Sight,  
 86

1 **A.** Sorry, I think the bluffing is in relation to the "you  
 2 have options or else", the sort of threat. He'd been  
 3 a serial correspondent. I don't know where this sits in  
 4 the course of that time, but my understanding is --  
 5 sorry, my recollection, and it is a recollection, again,  
 6 this is one of the more recently disclosed -- is,  
 7 certainly, we offered -- and I think it may have been  
 8 Angela van den Bogerd met with him to try to understand  
 9 the issue in the branch and so, you know, we had already  
 10 started to take steps to understand.  
 11 But, if he had information which he was clearly  
 12 saying he had, he should be able to share that with us  
 13 so we could manage it; we could process it, understand  
 14 it and respond as appropriate. He wasn't very specific  
 15 with what the issue was or where it was, so there were  
 16 very limited lines of inquiry that we had internally,  
 17 without something more from him.  
 18 **Q.** Why did you recommend that the Post Office should  
 19 respond with a straight bat, ie avoid answering the  
 20 direct questions or giving them the information they  
 21 want and just bat it back to them?  
 22 **A.** No, that's not what I'm saying there at all. I'm saying  
 23 a straight bat is, whatever I think about the  
 24 correspondent, we should respond to as his inbound in  
 25 enquiry seriously and appropriately. That's what  
 88

1 I meant by a "straight bat".  
 2 **Q.** So you weren't referring to responding with a straight  
 3 bat there as meaning when a batsman holds their bat  
 4 vertically and just knocks the ball back to the person  
 5 who sent it to them?  
 6 **A.** I don't know, it's the second time my -- a straight bat,  
 7 to me, means appropriately.  
 8 **Q.** Honestly, appropriately?  
 9 **A.** Yes.  
 10 **Q.** That's the sense in which you are using the expression,  
 11 rather than, as I've used it, ie bat it straight back to  
 12 them?  
 13 **A.** Yeah, no, no, sorry, straight bat is appropriately.  
 14 **Q.** What investigation was, in fact, carried out?  
 15 **A.** I recall writing a letter, as I think I indicated, to  
 16 Mr McCormack. I also recognised the letters that I'd  
 17 put in brackets where we'd invited other people to send.  
 18 I think his was slightly different. I seem to recall it  
 19 being a little bit different where I tried to address --  
 20 in his email he said there were concerns, you know --  
 21 what did he say? People not giving the right -- maybe  
 22 not here. Sorry, it's not in this one.  
 23 No, sorry, it's not in this. I can't see it anyway.  
 24 I've lost my train of thought, sorry. I wrote a letter  
 25 to him inviting him to share it and I think I added some

1 Then if we can go, please, to page 1, the foot of  
 2 the page, thank you, you say:  
 3 "I'm not inclined to reply -- and certainly we don't  
 4 need to ... given the tone of this and his other  
 5 communications, and we've already told him we're not  
 6 going to comment."  
 7 Then further up the page, you provide a draft for  
 8 Ms Vennells' Executive Assistant and say:  
 9 "Avene,  
 10 "On reflection I'd like to go back to Mr McCormack  
 11 with a short response, for no other reason than to  
 12 ensure he can't allege that we don't respond [to issues]  
 13 ...  
 14 "Mr McCormack,  
 15 "Post Office has asked me to respond to your email.  
 16 Post Office would be happy to consider any information  
 17 you may care to disclose ... However, and in line with  
 18 my previous reply to you dated 4 July ... Post Office  
 19 will not comment on the other matter you have raised."  
 20 Why were you writing these responses back to  
 21 Mr McCormack or drafting responses back to Mr McCormack  
 22 which all simply shut down what he was saying and didn't  
 23 say we will investigate the concerns that he raised?  
 24 **A.** Have we got anywhere in the bundle my -- this has  
 25 referred to two bits of correspondence from me, one is

1 extra comfort around that the material would -- to try  
 2 to give him confidence that the material would be  
 3 treated properly. I --  
 4 **Q.** Can we move on, then, in your dealings with Mr McCormack  
 5 POL00119584 that's E69. If we start by looking at  
 6 page 4 and 5. We're now in July of the following year  
 7 and Mr McCormack emails the Post Office, copying Paula  
 8 Vennells and Tim Parker in, in relation to  
 9 an investigation into the prosecution of Seema Misra.  
 10 Can you just scan that the first part of that  
 11 correspondence? Then, if we go to page 5, the third  
 12 paragraph, Mr McCormack says he finds it:  
 13 "... utterly appalling that Post Office seek to  
 14 prolong the suffering of a woman [that's Seema Misra]  
 15 who very clearly did not commit the crime she was  
 16 accused and convicted of. You have the opportunity to  
 17 contact the CCRC straight away on this matter and ensure  
 18 Ms Misra suffers no longer than she has to. I urge you  
 19 to do so today. At the moment I am prepared to consider  
 20 incompetence as the rationale behind these contemptible  
 21 failings of [the Post Office] to understand that Horizon  
 22 is capable of producing intermittent errors that result  
 23 in huge paper losses at subpostmaster branches. Any  
 24 subsequent delay will make me consider the far more  
 25 serious matter of conspiracy."

1 4 July 2016 and the other is 19 November, I assume,  
 2 2015. Do we have either of those?  
 3 **Q.** I can certainly try and find those over lunch, are you  
 4 saying that, in those, we will find --  
 5 **A.** I'm not sure. I'd like to see them because they are  
 6 referred to because I -- I think, consistent with the  
 7 previous email, we said we should ask him for what he's  
 8 got and, if we don't receive stuff, there's a limit to  
 9 how much correspondence you can engage with the person  
 10 who won't give you lines of inquiry or sufficient  
 11 information to take it forward. And I think in those  
 12 circumstances -- and I think this was happening at the  
 13 time -- it's appropriate to try to draw the  
 14 correspondence to an end or to a point where it can be  
 15 taken forward meaningfully.  
 16 **Q.** Did you think he was a mischief maker?  
 17 **A.** No, I -- I think he was a genuinely concerned  
 18 individual.  
 19 **Q.** You didn't think he was making mischief?  
 20 **A.** I don't quite know what you mean by that. I think he  
 21 was concerned. I mean, making mischief to me sounds  
 22 like this is a bit of a giggle, I don't think he --  
 23 nothing I saw on any of his correspondence made me think  
 24 he thought that, quite the opposite. I think he was  
 25 genuinely motivated to raise issues with us. The

1 challenge we had is we weren't quite sure what the issue  
 2 was.  
 3 **Q.** You couldn't tell from Mr McCormack, he wasn't  
 4 explaining himself clearly to you?  
 5 **A.** He just wasn't giving us any information to take things  
 6 forward. His references to an issue and a branch is not  
 7 something --  
 8 **Q.** He was inviting the Chief Executive to come to the  
 9 branch and not rely on people like you who were  
 10 misinforming her?  
 11 **A.** That's true, that's -- a lot of people ask lots of Chief  
 12 Executives --  
 13 **Q.** Why not take that up with some other person and say,  
 14 "Okay, we'll come to the branch and we'll look at  
 15 an error unfolding before our eyes, as you, Mr McCormack  
 16 say will happen"?  
 17 **A.** As I say, my recollection is that that had taken place  
 18 with Angela van den Bogerd but I'm not 100 per cent  
 19 confident of that recollection. That's what my  
 20 understanding is -- sorry, that's what my belief is.  
 21 **Q.** Last thing on this topic, can we look at POL00041382.  
 22 That's E28.  
 23 **A.** I'm sorry if I'm not as clear as this, I did any see  
 24 these on Friday evening, so I'm not as familiar with the  
 25 documents around here as I am with others in my  
 93

1 for any discrepancies in branch. I really want to try  
 2 to help this postmaster but clearly we cannot say that  
 3 we will not address what they have confirmed to us  
 4 ie that they have falsified their account.  
 5 "My preference would be to explain to this  
 6 postmaster what the errors to which he refers are and  
 7 that if these were affecting his branch we would be able  
 8 to identify that.  
 9 "On the false accounting point could we say  
 10 something along the lines of ..."  
 11 Then some text is inserted.  
 12 Then if we go to page 3, please, and if we look at  
 13 your email -- that's it. 16 November, you reply.  
 14 "Hi Angela -- I do not think that this is a genuine  
 15 request. It has all the hallmarks of Tim McCormack  
 16 mischief ... these [Freedom of Information] requests  
 17 were recently cited in a blog which thanked Mr McCormack  
 18 'for his work in relation to the Horizon system'.  
 19 Did you consider that Mr McCormack was making  
 20 mischief?  
 21 **A.** Well, I think at this point, sort of anonymised requests  
 22 from "AN Obody" might drift a little bit closer but, no,  
 23 again, I think he was motivated -- to be clear, I don't  
 24 know that this was from Mr McCormack. I'm saying it  
 25 struck me it had the hallmarks I think from -- and  
 95

1 statement.  
 2 **Q.** E28.  
 3 **A.** Thank you.  
 4 **Q.** Can we start, please, on page 7. If we scroll down,  
 5 please, thank you, there's an anonymous Freedom of  
 6 Information request. Can you see that on the middle of  
 7 page 7? If we scroll up, please, Angela van den Bogerd  
 8 sends that on to a range of people and says:  
 9 "In the light of the Court Action I think Legal  
 10 should draft the response on this, we have provided the  
 11 'anonymous' person options to resolve the alleged issue  
 12 ... and cannot do much else in this public arena and  
 13 advised what they should do if they want an internal  
 14 review.  
 15 "I think the response should be based on the fact  
 16 that this is not a request for recorded information and  
 17 whatever context are felt to be required -- therefore  
 18 I have attached the basic response to this for  
 19 amendment."  
 20 Then if we go forward to page 5, please, in the  
 21 middle of the page -- so if we can scroll. That's it.  
 22 Ms van den Bogerd says to you:  
 23 "This postmaster clearly thinks the answer to their  
 24 problem is in this list of errors and in all likelihood  
 25 is therefore not looking/or does not know how to look  
 94

1 I think reading it -- from reading back, trying to --  
 2 the style was similar to the way he wrote. But I don't  
 3 know that it was him.  
 4 **Q.** Did you think generally he was making mischief?  
 5 **A.** No, I think -- I thought I'd answered that. No, he was  
 6 genuinely motivated to pursue, I think in particular,  
 7 Seema Misra's case. I think that's clear from the  
 8 feeling you can see in his emails.  
 9 **Q.** Thank you. That can come down.  
 10 Looking back, then, in your dealings with the media,  
 11 with subpostmasters, whether directly or indirectly, who  
 12 were making complaints about Horizon, do you say you  
 13 acted appropriately at all times?  
 14 **A.** I certainly tried to. There's a possibility I didn't.  
 15 All times is quite a long time and I think we've already  
 16 seen one email that, on the banter side of things,  
 17 was -- you know, maybe would have -- would not have sent  
 18 or expressed differently.  
 19 **Q.** Thank you.  
 20 **A.** I'd like to think I always that respect for them because  
 21 they were dogged and determined.  
 22 **Q.** Did you ever think, as well as being dogged and  
 23 determined, they might be right?  
 24 **A.** Yes.  
 25 **Q.** Did you ever express that openly, "Hold on, we should  
 96



1 all just pause; they might actually have a point here"?

2 **A.** Well, I think we -- by our actions, we were doing that,  
3 the scheme sought to do that by investigating the -- the  
4 Mediation Scheme sought to do that by investigating the  
5 individual cases.

6 **Q.** That was a genuine attempt to get to the truth, was it,  
7 the Mediation Scheme?

8 **A.** As far as I was concerned, yes.

9 **Q.** The setting up of the Second Sight interim investigation  
10 before it? That was a genuine attempt to get to the  
11 truth, was it?

12 **A.** It was -- as far as I was aware, yes. I came after that  
13 had started, so, you know, the genesis for it, the  
14 origins with it, I'm less familiar with but everything  
15 I saw suggested that's exactly what it was.

16 **Q.** Can we look, then, at your engagement with Second Sight  
17 and the complaints that were made before it published  
18 its Interim Report in July 2013. So we're looking at  
19 the period here August 2022 to July 2013. Can we start,  
20 please, with your witness statement at page 15,  
21 paragraph 32.

22 **A.** Sorry, page 50, paragraph 32? Paragraph 32. Thank you.  
23 Sorry, 15. I beg your pardon.

24 **Q.** I should just read for context or ask you to look at  
25 context -- just cast your eye over paragraphs 29, 30 and

97

1 **Q.** -- about Horizon immunity proposals and you outline  
2 a proposal from the JFSA in the first three bullet  
3 points. If we scroll down, you say, "Our draft  
4 response", and then you set out three bullet points.

5 So you're essentially noting the Post Office's  
6 options are: do nothing to this proposed immunity,  
7 ie a non-retribution against postmasters for engaging in  
8 the scheme; secondly, propose a no-blame inquiry to be  
9 carried out by Second Sight, which would determine  
10 whether Horizon was fit for purpose but would not rule  
11 on individual cases; or mediate with the JFSA? In  
12 relation to the latter option, you say:

13 "This may just at further time and cost with no  
14 guarantee of a successful outcome."  
15 Yes?

16 **A.** Yes.

17 **Q.** If we scroll down. Thank you. You say:  
18 "If we go down the Inquiry route:  
19 "It would determine whether Horizon is 'fit for  
20 purpose', by reference to comparable systems;  
21 "It would not 'rule' on individual cases because of  
22 the very wider range of concern which could be submitted  
23 (eg inadequate training, inadequate support, user error,  
24 third party intervention, Horizon itself).  
25 "Cases will be chosen by Second Sight/JFSA/

99

1 31.

2 With that background, you say in 32 --

3 **A.** Sorry, can I just finish? Thanks. Thank you.

4 **Q.** With that background, you say in paragraph 32:  
5 "While these tasks gave me some awareness of the  
6 controversy around Horizon, I did not get into the  
7 detail of Second Sight's work or the underlying  
8 complaints, and I was not involved in considering the  
9 merits of any of the concerns being examined by Second  
10 Sight."  
11 I just want to examine the extent of your  
12 involvement and the extent of your role at this time.  
13 Can we look, please, at POL00143827; that's tab E80.

14 **A.** E80 or E18?

15 **Q.** E80.

16 **A.** Thank you. *(Pause)*

17 **Q.** Are you there?

18 **A.** I'm sorry?

19 **Q.** Are you there?

20 **A.** Yes, I am, sorry. Sorry, I thought I'd said. I beg  
21 your pardon.

22 **Q.** It's 1 November 2012.

23 **A.** Yes, I have that.

24 **Q.** An email from you to Mr Flemington --

25 **A.** Mm-hm.

98

1 [subpostmasters], not [the Post Office] -- this helps  
2 neutralise any suggestion that [the Post Office]  
3 'cherry-picked' cases or that the process is  
4 a 'whitewash'. [The Post Office] can still advance its  
5 case on the investigation concerns."

6 Just looking at that first page, it seems, at this  
7 time, November 2012, so within three or four months of  
8 you joining the company, you were engaged in considering  
9 how subpostmasters' concerns would be addressed by or  
10 interact with an investigation by Second Sight, weren't  
11 you?

12 **A.** Yes, I was, I actually -- looking at my statement -- I'm  
13 sorry -- what I think I'm saying in paragraph 32 is  
14 I wasn't looking at the detail of the individual  
15 complaints, so I'm sorry if that's given the wrong  
16 impression.

17 **Q.** Why were you conscious of suggestions that the Post  
18 Office would cherry-pick cases or whitewash cases  
19 considered by Second Sight?

20 **A.** Well, to get a conclusion, you need something -- so  
21 it -- well, my understanding was they were trying to --  
22 that Second Sight had been instructed to get to the  
23 bottom to see whether issues with Horizon could have  
24 been the source of unexplained shortfalls in branch  
25 accounts. If Post Office leads with its own cases and

100

1 only its own cases, it's marking its own homework, it's  
2 open to challenge, being, you know, biased, selectively  
3 in favour of their own and, hence, the exercise was  
4 probably unlikely to satisfy the counterparty.

5 **Q.** So it would be fair to say, looking at your involvement  
6 at this stage, you're addressing process or structural  
7 issues, rather than individual case?

8 **A.** I think so, yes.

9 **Q.** Yes?

10 **A.** Yes.

11 **Q.** We can take that down.

12 Can we look, please, to POL00186090, that's tab  
13 E100.

14 **A.** I have that, thank you.

15 **Q.** We're now in spring 2013, and can you see that, at the  
16 foot of the page, if we scroll down, Mr Swepson, who is  
17 a Programme Planner in the IT Separation Programme  
18 Office, if we scroll down a little further, sends you  
19 some spot reviews. Just summarise for us what a Spot  
20 Review was?

21 **A.** My understanding was a Spot Review was Second Sight's  
22 work had identified specific instances of, I guess,  
23 branch issues, at the widest level, that had been put to  
24 them by the postmasters that they wanted to deep dive.  
25 Those issues were sort of crystallised into an issue

101

1 **A.** Yes. I wonder if it was either "briefing" or "meeting"  
2 I'm not sure. It's a typo for sure.

3 **Q.** You told us in your witness statement that you were not  
4 interested in considering any of the merits of the cases  
5 being examined by Second Sight and this seems to have  
6 you going to a meeting to discuss a draft response?

7 **A.** I don't believe I attended that meeting. I don't recall  
8 doing it.

9 **Q.** Why were you involved or why were you to be involved in  
10 the formulation of the Post Office's responses to spot  
11 reviews?

12 **A.** So part of my role, I was quite often the point man, the  
13 conduit, between external advisors to a project team.  
14 In this case, Bond Dickinson were supporting Post  
15 Office's review of the spot reviews and I think the  
16 programme lead for the Second Sight engagement --  
17 I think we saw a footnote somewhere in my statement --  
18 the project lead was a guy called Simon Baker. I think  
19 he had asked for two things. He'd thought -- one was to  
20 strengthen the language, the form, the content of the  
21 spot reviews to better advance Post Office's response to  
22 the issues.

23 **Q.** To put it as robustly as was possible; is that right?

24 **A.** Quite possibly. I can't remember if that's the words  
25 used but it was of that tenor, yes. And then he also

103

1 with each issue being named a Spot Review. So I think  
2 two are referenced in this.

3 So spot review was an attempt -- forgive me, I'm  
4 fluffing my lines. Spot review was an attempt to  
5 analyse in detail a specific allegation raised to Second  
6 Sight through this interim early phase, the first phase  
7 of their work.

8 **Q.** Thank you. If we scroll up, that having been sent to  
9 you by Mr Swepson, if we just look at the email, you  
10 send it on to Gavin Matthews and Andrew Parsons, yes?

11 **A.** Yes.

12 **Q.** You say:

13 "I confirm our meeting this Wednesday [is at] Old  
14 Street ...

15 "... I attach the 'Spot Reviews' we have received  
16 and our current draft responses.

17 "We will discuss the responses at the meeting, with  
18 a view to producing a standalone document which sets out  
19 our definitive position on the issue raised in the 'Spot  
20 Review' ... the final response [may] enter the public  
21 domain, so we need to ensure that it is robust,  
22 defensible and properly protects/advances Post Office  
23 Limited's case.

24 "I look forward to [I suspect that should mean  
25 'briefing'] you on Wednesday."

102

1 asked, I think, for support from some lawyers on that  
2 because -- and then, thirdly, I think he also asked if  
3 I could arrange a meeting at their offices because  
4 finding a meeting room was always quite difficult.

5 I have to say, I don't particularly recall this but  
6 I managed to refresh myself from my documents.

7 I think, ultimately, the meeting was held at 148 Old  
8 Street, which was Post Office's office, which is why  
9 I think I was able to meet Gavin and Andy when they came  
10 but, as I say, I don't actually recall attending the  
11 meeting.

12 **Q.** Was a defensive approach taken to Post Office's response  
13 to the spot reviews?

14 **A.** I suppose you could say defensive; you could also say it  
15 was an offensive one, it was a proactive one, they were  
16 trying to positively advance their response. You could  
17 say it either way. Both are, I think, fair  
18 interpretation -- it was certainly trying to put their  
19 position, our position, as firmly as possible.

20 **Q.** To what extent did that undermine the purpose of the  
21 Second Sight investigations?

22 **A.** I don't think it did because Second Sight would review  
23 it and consider it and comment as appropriate but --

24 **Q.** It wasn't meant to be a litigious or adversarial  
25 process, was it?

104

1 A. No, but also I don't think articulating things in a, you  
 2 know, clear and representative manner is necessarily  
 3 adversarial. You might not like what's been written but  
 4 it doesn't mean it's not there for consideration.

5 Q. Were instructions given to you to take an open and  
 6 transparent approach with Second Sight or to take  
 7 a robust one which properly advanced a case on behalf on  
 8 the Post Office?

9 A. I don't actually recall any instruction either way on  
 10 that. It was provide information to them that they  
 11 asked for -- at this stage, certainly was that.

12 Q. Was there no overarching strategy in the Post Office's  
 13 response to the initial Second Sight investigation?

14 A. I'm not aware of one or I don't recall one today,  
 15 certainly I don't recall being aware of one at the time  
 16 either.

17 Q. You don't remember instructions to the effect that,  
 18 "This process has been set up as an alternative to  
 19 litigation, we should not adopt an adversarial approach  
 20 in it, a litigious approach, one in which we are  
 21 lawyered up. We should try and be as open as possible  
 22 to let the truth filter out"?

23 A. I'm sorry, there's a lot in there. What's the question,  
 24 sorry?

25 Q. You don't remember any instructions, for the purposes of  
 105

1 was a form in which an application to the Mediation  
 2 Scheme would articulate their concerns, what they wanted  
 3 investigated and why, I believe. Sort of get the  
 4 inbound complaint, as it were.

5 Q. Anyway, you attached amendments to a proposed reply to  
 6 the case questionnaire and, in the third paragraph, you  
 7 say:

8 "Taking a step back, [Mr] Castleton seems to be  
 9 relitigating his High Court case (I'm going to look at  
 10 the judgment over my sandwich -- but a [very] quick  
 11 glance shows that even the £100.20 scratchcard issue was  
 12 considered). I appreciate that we can't just behind  
 13 that (he'll say he didn't have the resources to take on  
 14 the Big Boy), but I do think we can set out a stall  
 15 where we portray him as someone who wants £5.2 million  
 16 after providing inadequate services for all of  
 17 9 months."

18 So this was you amending/tweaking the Post Office's  
 19 response in the initial Second Sight review process?

20 A. Yes.

21 Q. You told us in your witness statement that you weren't  
 22 involved in considering the merits of individual cases?

23 A. I think that's because -- where I said that first bit  
 24 was in relation to Second Sight's work up to the interim  
 25 report, that this is produced through the Mediation  
 107

1 the initial Second Sight review, to you or to lawyers  
 2 involved in the Second Sight initial review, which said,  
 3 "We should adopt an open and transparent approach,  
 4 not" -- sorry, yes?

5 A. I'm sorry, I don't recall an instruction like that. On  
 6 the litigation point, I think I became aware that these  
 7 had recently been -- sorry, similar cases had recently  
 8 been the subject of litigation and there was a concern  
 9 that was always in the background. So I wouldn't want  
 10 to say that there wasn't a concern of litigation in  
 11 there, which is why -- and, in here, you can see I've  
 12 said "Look, they need to be defensible and properly  
 13 protect Post Office's position".

14 I don't know that that's inconsistent with putting  
 15 forwards information in an open or transparent manner  
 16 and I think it's just how it's presented.

17 Q. Can we move on. POL00074005. That's tab E43.

18 A. I have it, thank you.

19 Q. We're now in November 2013 and we can see from this  
 20 page, you writing to Mr Parsons, saying you attach your  
 21 mark-up of the Post Office's response to the Castleton  
 22 CQ. Can you remind us of what a CQ was?

23 A. I think that's a case questionnaire.

24 Q. Can you remember the function or purpose of a CQ?

25 A. I hope so. It was the applicant to the schemes -- it  
 106

1 Scheme, where I did look at the detail of some cases but  
 2 certainly not all of them.

3 Q. So after July '13 you took a different role; is that  
 4 right?

5 A. After July '13 when the Mediation Scheme started I did  
 6 start looking at some cases in varying depths of detail.

7 Q. Why was your reaction to Mr Castleton's CQ to set out  
 8 a stall rather than investigate the issues that were  
 9 raised?

10 A. In this case, and it literally was, I think, this sole  
 11 case, I was aware that Mr Castleton's complaints about  
 12 branch accounting had been the subject of High Court  
 13 proceedings and, indeed, trial and judgment, which --  
 14 the judgment of which underpinned a lot of the Post  
 15 Office's operating practices, with respect to -- as far  
 16 as I can tell, with respect to postmasters up until the  
 17 Group Litigation.

18 Q. That's interesting. Tell us to what extent the *Lee*  
 19 *Castleton* judgment underpinned a lot of the Post  
 20 Office's operating practices until the next judgment  
 21 12 years later?

22 A. It was a High Court judgment that confirmed an agent's  
 23 liability to the principal for accounting and it also  
 24 made findings that Horizon had been working, quite  
 25 specifically, though, in that case, in that branch.  
 108

1 Q. How did that second point underpin the Post Office's  
2 approach to its operating practices for the following  
3 12 years?  
4 A. Well, I think it was a strand, but certainly not the  
5 only one, that gave them confidence in the reliability  
6 of the system.  
7 Q. Was it reviewed or referred to a lot within the Legal  
8 Team, then?  
9 A. Yes, yes, it would have been. It was the -- as far as  
10 I was aware, at that time, and I think, certainly from  
11 my time, it was the only High Court judgment on this  
12 issue or, certainly, the most -- sorry, I'll rephrase  
13 that, it was the most recent one. I definitely know  
14 that.  
15 Q. Was its importance elevated or emphasised, then, within  
16 Post Office's Legal team?  
17 A. Certainly to me it was, yes.  
18 Q. Who did that to you? Who said that to you or are you  
19 saying that you read the judgment and formed that view  
20 yourself?  
21 A. I certainly think it's the latter but -- I would have  
22 said it was the latter, yes, I would have said it's  
23 something I formed.  
24 Q. So what did you take from it? I think you said two  
25 things there: firstly, it confirming the agent point,

109

1 Q. After you became involved more extensively in the Second  
2 Sight work, did you continue in your role as point man  
3 for media relations within the Legal team?  
4 A. Yes, I would think so.  
5 Q. Can we look at POL00145120, please. That's E82. Can we  
6 start by looking on the foot of page 1 and on to page 2,  
7 please. We see an email from you of 3 July 2013, so  
8 this is four or five days before the publication of the  
9 Second Sight Interim Report. You are emailing Susan  
10 Barty, who is a partner, I think, at Cameron McKenna,  
11 yes?  
12 A. Correct.  
13 Q. You say, in relation to the Second Sight Interim Report:  
14 "We expect to see Second Sight's Interim Report late  
15 Thursday/early Friday. I will forward it to you as soon  
16 as it is to hand so you can review it for factual  
17 accuracy and (as requested by our Chairman) any possible  
18 defamation issues. We will want as quick a turnaround  
19 as possible."  
20 Why did the Post Office engage Cameron McKenna to  
21 review the Second Sight Report for defamation issues?  
22 A. I think there was a concern, I was working on sort of  
23 direction from --  
24 Q. From the Chairman?  
25 A. Well, actually I was getting it sort of secondhand,

111

1 yes?  
2 A. Yes. I'm trying to think what else I'd take from it.  
3 I haven't read the judgment for a while but -- sorry,  
4 that was one of -- one of it was an agent's liability to  
5 principal and the second point was that when they looked  
6 at the complaints, and that's -- this is what I referred  
7 to here, the specific complaints that had been raised  
8 had been forensically interrogated in the High Court  
9 proceedings to the point that a judge was able to say  
10 Horizon was working or the judge felt able to say that.  
11 Q. You say here that you cannot hide behind the judgment.  
12 A. Can you remind me where I say that, sorry?  
13 Q. Third paragraph:  
14 "Taking a step back, Castleton seems to be  
15 relitigating his High Court case ... I appreciate we  
16 can't just hide behind that ..."  
17 A. No, I'm saying you can't just say he litigated and go  
18 but I thought it was fair to make comments that some of  
19 the issues he had raised had been raised and adjudicated  
20 on before. I think what I'm saying there -- again, it's  
21 a little while -- I think what I'm saying there is you  
22 can't just be dismissive, you had your day in court, go,  
23 but also, I did think -- well, I think I think -- it's  
24 appropriate to recognise the judgment in the proceedings  
25 that had taken place.

110

1 I think, from the General Counsel.  
2 Q. But you understood it came from the Chairman?  
3 A. I certainly understood it came from the Chairman that  
4 there was a concern that the -- or they wanted to know  
5 that the reporting would be accurate -- sorry, the  
6 report would be accurate.  
7 Q. That's a bit different because you say:  
8 "... you can review it for factual accuracy and ...  
9 any possible defamation issues."  
10 A. Yes.  
11 Q. Was the Post Office considering suing Second Sight for  
12 defamation?  
13 A. It depends -- I wasn't aware of that instruction.  
14 Q. Right from the top?  
15 A. I don't know exactly what "from the top" was. What  
16 I recall was being asked to get a media lawyer to look  
17 at it -- and I think, you know, defamation was used, so  
18 clearly was used, but I wouldn't go as far as to say  
19 because they were thinking of suing. I think that's --  
20 we're being asked to look to see what grounds there may  
21 or may not be for something like that.  
22 Q. Why would the Post Office be looking at what grounds  
23 there would be to bring a defamation claim against  
24 Second Sight?  
25 A. So I think it's reputation management first and foremost

112

1 and are untruths going to be said that may damage Post  
2 Office? I'm pretty sure -- because I did look around  
3 this a little bit, I'm pretty sure we gave some advice  
4 pretty quickly explaining the challenges that  
5 a corporate entity has in pursuing defamation actions  
6 and, in particular, the need to prove demonstrable loss.  
7 But I think that the shorthand was are untruths going to  
8 be said which will cause us harm?  
9 **Q.** Again, was that part of the open and transparent  
10 approach that the Post Office was taking towards Second  
11 Sight's work?

12 **A.** I don't think so no.

13 **MR BEER:** Sir, it's 1.00, nearly. Might we break now until  
14 2.00 pm please.

15 **SIR WYN WILLIAMS:** Yes, of course.

16 **MR BEER:** We're about to change topic.

17 **SIR WYN WILLIAMS:** Fine, that's fine.

18 **MR BEER:** Thank you.

19 (12.58 pm)

20 (The Short Adjournment)

21 (2.00 pm)

22 **MR BEER:** Good afternoon, sir, can you see and hear us?

23 **SIR WYN WILLIAMS:** Yes, thank you.

24 **MR BEER:** Good afternoon Mr Williams, can we go back to  
25 an issue that we addressed this morning which was your

113

1 Mr Williams, of material to Second Sight. Can we turn  
2 up page 14 of your witness statement, paragraph 30,  
3 please. Can you see in paragraph 30, you say:  
4 "Second Sight had been appointed before [you] joined  
5 [the Post Office] and [you] did not have any direct  
6 knowledge of the process or how the scope of its  
7 original retainer was determined."

8 Then three or four lines on you say:

9 "... I felt I needed to raise the risks around  
10 disclosing legally privileged documents to a third party  
11 without putting a clear framework in place to govern  
12 their use."

13 **A.** Yes.

14 **Q.** Then, if we go to paragraph 34 on page 16, please, you  
15 say you remember reviewing a number of draft Spot  
16 Reviews to see what they looked like, sharing thoughts  
17 with Womble Bond Dickinson. Then a couple of lines on:

18 "I recall that [the Post Office] sought to organise  
19 the preparation and drafting of the Spot Reviews in  
20 a way that would maximise the potential for [the Post  
21 Office] to claim legal professional privilege over them  
22 and any exchanges with Fujitsu relating to them as they  
23 were being developed."

24 Was that essentially a strategy that would apply in  
25 ordinary litigation?

115

1 advice on communications with Tim McCormack, and you  
2 asked whether it would be possible to see a letter that  
3 you wrote. I think I've tracked that down. It's  
4 POL00118066.

5 Can you see this is a final version of a letter that  
6 was sent to Mr McCormack. At the foot of the page we'll  
7 see that it was sent by you and, at the top of the page,  
8 we'll see it's 19 November 2015. If you quickly scan  
9 the paragraphs to see if it is the letter to which you  
10 were referring.

11 **A.** I think it is.

12 **Q.** It is the letter. So was the point you were making that  
13 in this letter, by this letter, you had asked  
14 Mr McCormack to provide you with evidence?

15 **A.** Yes.

16 **Q.** Thank you very much.

17 Sir, in relation to some questions that you asked  
18 Mr Williams earlier about the post-trial pre-judgment  
19 exchange of correspondence over the 14,000 new KELs,  
20 there is some material which touches upon that. I'll  
21 address that, if I may, tomorrow morning with  
22 Mr Williams, so that we've got the complete set of  
23 correspondence on the system.

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

25 **MR BEER:** Can we turn to the provision, therefore,

114

1 **A.** I would think so. When it's contemplated, you're  
2 usually keen to understand what's in issue before, so  
3 that you can take informed advice on it before  
4 proceeding to take your actions.

5 **Q.** Were you comfortable in cross-applying that approach to  
6 the Second Sight initial investigation?

7 **A.** I'm -- I think there are two bits there. Part of it was  
8 also so that the company could obtain advice on what was  
9 being revealed through the investigations. So I think  
10 the privilege in issue wasn't just in connection with,  
11 say, contemplated litigation but also so that advice on  
12 what it may mean for Post Office's legal position could  
13 be obtained as material was identified or created.

14 **Q.** Was any consideration given to the fact that you were  
15 not in litigation at this time but you were in a sort of  
16 quasi-mediation process?

17 **A.** My recollection is that the prospect of litigation was  
18 sort of always sitting there. Looking at it today, I'm  
19 not sure whether it would be properly contemplated for  
20 the purposes of litigation privilege but, at the time,  
21 it felt like a claim was always around the corner.

22 **Q.** Was any consideration given to the fact that your  
23 company was Government owned and, in many of the  
24 functions it discharges, discharges them -- or they are  
25 functions of a public nature?

116

- 1 **A.** That was a consideration that came up a lot, was POL  
2 a public body?  
3 **Q.** You called it a public body there. Was that a factor  
4 that was brought consciously into account in the course  
5 of either the first part of Second Sight's activities or  
6 when you entered the Mediation Scheme proper?  
7 **A.** I don't recall it. I'm thinking it's more -- sorry, let  
8 me -- sorry, could you have another go at, sorry, the  
9 question. I think I know where you're at but I'd like  
10 to make sure I understand the question.  
11 **Q.** Was any consideration given to the fact that your  
12 company was Government owned and many of its functions  
13 were those of a public nature -- you called it public  
14 body -- in either the initial activities of Second Sight  
15 or when you ended the mediation proper?  
16 **A.** Yes, it was. I'm sorry, and thank you for --  
17 I appreciate that. I think they're a little bit --  
18 I remember it being an issue, largely because of  
19 questions around whether -- from where, in so far as my  
20 role was concerned, whether, you know, Post Office's  
21 actions may be amenable to judicial review, was  
22 certainly part of that consideration. I think there was  
23 also consideration that Post Office is amenable --  
24 sorry, is open to Freedom of Information Act requests  
25 as, effectively, a designated body for that Act.

117

- 1 Team, so far as you're aware?  
2 **A.** I don't recall that, no.  
3 **Q.** Was it ever discussed between you as the lawyers and  
4 executives as the client?  
5 **A.** I don't recall that.  
6 **Q.** "Hold on, we're a public body here. Some might say that  
7 we've got different duties and standards to adhere to  
8 and apply. We're not just another big corporation who's  
9 free to litigate in any manner we choose"?  
10 **A.** Not in those terms but there was the sense that, you  
11 know, Post Office -- I do think there was a sense the  
12 Post Office -- because we were in communities length and  
13 breadth of the nation, that it was important to be doing  
14 the right thing. I think that's probably the way to  
15 describe it. I think there was a concern for that to be  
16 done. I don't recall it in the sort of construct of  
17 a public body that you've been describing.  
18 **Q.** I think it's fair to say, in the 130-odd pages of your  
19 witness statement, we don't see the considerations that  
20 I've just raised reflected; that's right, isn't it?  
21 **A.** That's correct, yes.  
22 **Q.** In any of the documents, I don't think we see those  
23 considerations reflected, do we, certainly the ones  
24 you've seen?  
25 **A.** No, we don't. I don't think so, no.

119

- 1 **Q.** Both of those answers, Mr Williams, are essentially  
2 technical legal answers as to the status of the Post  
3 Office and the application of either public law or the  
4 Freedom of Information Act to it.  
5 My question was: in the context of either the  
6 initial work by Second Sight or in the mediation proper,  
7 was consideration given to your status as a public body,  
8 as you've described it, in terms of how should we  
9 approach these things?  
10 **A.** I don't think so. I think the -- not terribly far  
11 removed from that maybe was, you know, the concern that  
12 Post Office is in every community throughout the length  
13 and breadth of the country. That was -- Post Office's  
14 status in those communities was I think part of it. But  
15 that -- and we were also, you know, aware of, you know,  
16 very considerable stakeholder interests from Members of  
17 Parliament who were considered -- I think they were  
18 quite offered referred to as a stakeholder group, but  
19 I don't recall anything other than that, but that may be  
20 because it just wasn't in my bailiwick.  
21 **Q.** It's sometimes said that public authorities, public  
22 bodies or organisations who discharge functions of  
23 a public nature should operate by different standards in  
24 litigation or quasi-litigation, like a mediation. Was  
25 that something that was ever discussed within the Legal

118

- 1 **Q.** Was that a concept with which you were familiar at the  
2 time: public authorities may have to behave differently,  
3 when they come into contact with the law, than private  
4 companies?  
5 **A.** No, that's not a concept I'm familiar with, I'm sorry.  
6 **Q.** Would it be fair to say that, in your legal advice and  
7 any discussions you had with clients, you regarded the  
8 Post Office as any other litigant. It could be a big  
9 City corporation?  
10 **A.** No, no. I -- I don't think we could act in the way Big  
11 Oil would act.  
12 **Q.** I'm sorry, I missed that word: big?  
13 **A.** Big Oil, for instance, like a large petrochemical  
14 company. No, I think there was --  
15 **Q.** Why not?  
16 **A.** Because there was a sense that, I think, Post Office was  
17 concerned about its images, it's in communities, it's  
18 part of the fabric of society and, as a consequence, it  
19 couldn't be a "plough on, be damned".  
20 **Q.** Okay, we'll move on. Can we turn to page 17 of your  
21 witness statement and paragraph 36. You say:  
22 "The Inquiry has asked me to comment on a draft  
23 email addressed to John Scott, (the [Post Office] Head  
24 of Security) and Rob King (the [Post Office] Senior  
25 Security Manager and his [that's Mr Scott's] deputy),

120

1 which was sent to me and Simon Baker on 13 May 2013 by  
 2 Dave Posnett (an Accredited Financial Investigator).  
 3 The drafts contains a series of bullet point updates on  
 4 the Spot Review process. It appears from the email that  
 5 I had asked for draft [responses] to be sent to me for  
 6 forward transmission to [Messrs Scott and King]  
 7 I believe I requested this for two reasons. First, part  
 8 of my role was sometimes to review and/or distil  
 9 information provided by one part of the business  
 10 comprehensibly for other parts of the business so that  
 11 there was a consistent 'joined-up' position. Second, if  
 12 the emails contained legal advice or concerned matters  
 13 on which legal advice would be required then [the Post  
 14 Office] would be better placed to claim legal  
 15 professional privilege over the material if it had been  
 16 sent to or received by a legal adviser."

17 Do you agree Post Office could not claim privilege  
 18 over communications simply because they were sent by or  
 19 to a lawyer?

20 **A.** Yes. You cannot claim privilege just because it's sent  
 21 to a lawyer.

22 **Q.** Were you, by adopting this approach, routing emails like  
 23 this through you, seeking to protect the communications  
 24 in that way by making a claim of privilege available to  
 25 you?

121

1 was to inadvertently be sent to the wrong email address  
 2 or intercepted innocently or otherwise, once out in the  
 3 public domain it will be hard to control.

4 "Having agreed with Susan Crichton, with immediate  
 5 effect, all information should where possibly placed  
 6 onto a document and access is through a password  
 7 protocol. The procedure is easy to use and only takes  
 8 a matter of seconds."

9 Then there are some administrative details and then:

10 "Additionally commercially sensitive and/or legally  
 11 privileged information should not be copied/pasted onto  
 12 unprotected email text to make it more easily readable  
 13 on a BlackBerry."

14 Why was a review conducted in mid-2013 of the  
 15 management of and exchange of information with Second  
 16 Sight?

17 **A.** I'm sorry? I'm sorry, it was a bit too quick. I didn't  
 18 follow.

19 **Q.** Yes. Why was a review conducted in mid-2013 into the  
 20 management of and exchange of information with Second  
 21 Sight?

22 **A.** I don't know what triggered that.

23 **Q.** Can you recall --

24 **A.** Sorry, could I see the date of this?

25 **Q.** Yes, it's July.

123

1 **A.** Yes, if the claim was available. If the communication  
 2 was for the purposes of obtaining advice or advice sort  
 3 of flowed from it, it raised issue -- it's -- the -- my  
 4 recollection at this time was information was being  
 5 created and generated, that some of it was new to Post  
 6 Office and it was certainly newly created, for instance  
 7 the Spot Reviews, and it wanted, I think, to understand  
 8 what that was, take advice as appropriate on it, before  
 9 it entered the public domain where its ability to  
 10 address the information would be harder to manage.

11 **Q.** Can we look, please, at POL00142323. I'm afraid  
 12 I haven't got the tab number for that. POL00142323,  
 13 thank you. It's a one-page email from Mr Scott to,  
 14 amongst others, you. You can see the distribution list  
 15 at the top.

16 **A.** Yes.

17 **Q.** The subject is "Protection of Commercially Sensitive  
 18 and/or Legally Privileged? Information", and Mr Scott  
 19 says:

20 "A review has been conducted in respect of  
 21 commercially sensitive and/or legally privileged  
 22 information, in particular with the management of  
 23 exchange of information subject to the Second Sight  
 24 review. Whilst most information within this group will  
 25 be [legally] privileged, nonetheless, if the information

122

1 **A.** Oh, sorry. Now I see the date, I imagine that this --  
 2 I don't know about the review but there was certainly  
 3 an issue with potential shredding of -- I mean, reported  
 4 shredding or suggestion to shred, however you want to  
 5 describe it, of documents, I think in July -- around  
 6 this time. I might need some help with the date but it  
 7 certainly feels contemporaneous to this.

8 **Q.** Do you think this review into the management and  
 9 exchange of information subject to the Second Sight  
 10 review was, therefore, triggered by the allegation that  
 11 some minutes of a meeting either had been shredded or  
 12 were ordered to be shredded?

13 **A.** Sorry, I think there are two parts to that. I don't --  
 14 I'm not aware of a review, in the sense of -- we had  
 15 quite a few sort of quite formal reviews. I'm not aware  
 16 of a -- including, say, of the past prosecutions -- that  
 17 was about to commence at this time. So I'm not quite  
 18 sure about that. But I think that -- I suspect the  
 19 catalyst for this will have been what you described.  
 20 I'm not sure about the format. Does that make sense?

21 **Q.** Do you know who conducted the review?

22 **A.** Well, that's what I say, I'm not really familiar with  
 23 the concept of a review here.

24 **Q.** Mr Scott's was somebody whose department was under  
 25 scrutiny in the course of the review, wasn't it? The

124

1 Second Sight review?

2 **A.** Yes, I think security files were being provided, yes,  
3 I think that's correct, yes.

4 **Q.** Is the way that investigators had conducted themselves  
5 was something that some complainants had raised?

6 **A.** I don't know whether I was aware of that at the time but  
7 I think that's correct, yes.

8 **Q.** Do you know whether Mr Scott conducted the review of  
9 commercially sensitive and legally privileged  
10 information?

11 **A.** As I say, I'm not familiar with the review, so I don't  
12 know who may or may not have carried that out.

13 **Q.** Can I turn then to the Second Sight Interim Report of  
14 8 July 2013. I think it's right you know that that  
15 report referred to three bugs in Horizon: the receipts  
16 and payments mismatch bug; the suspense account bug; and  
17 the Callendar Square, sometimes called Falkirk, bug?

18 **A.** Yes.

19 **Q.** You know, I think, that Simon Clarke's advice of 15 July  
20 was written in response to, amongst other things, that  
21 Interim Report?

22 **A.** Can I say I'm afraid I get Mr Clarke's advices confused.  
23 Can I be taken to the --

24 **Q.** Yes, we can look at the first advice, if you want to,  
25 it's the 15 July advice, POL00040000. That's B65, if  
125

1 suspense account bug.

2 He doesn't, in fact, mention, Mr Clarke here, the  
3 fact that Second Sight had been told about and picked up  
4 the Callendar Square and Falkirk berg. Then he  
5 continues, at 29:

6 "On Thursday, 27 June, Martin Smith of Cartwright  
7 King was telephoned by [the Post Office]. There then  
8 ensued number of conversations between [Martin Smith]  
9 and senior [Post Office] executives. The import of what  
10 [Martin Smith] was being told may be summarised thus: he  
11 was informed by [the Post Office] that a report  
12 commissioned from Second Sight by Post Office Limited,  
13 and as yet unpublished, indicated that Horizon may not  
14 be 'bug' free. There was much speculation as to the  
15 content of the Second Sight Report. It appeared to [the  
16 Post Office] that some within the organisation had been  
17 aware of bugs affecting up to 30 offices including some  
18 Crown Office branches. Jarnail Singh, Head of Criminal  
19 Litigation, had been unaware and did not know how long  
20 [Post Office Limited] had known of the existence of the  
21 bugs nor indeed who at [the Post Office] had known."

22 So we've got Mr Clarke recording here that Mr Singh,  
23 on being told of the possible conclusions of Second  
24 Sight, as to bugs, said that he had been unaware and  
25 didn't know for how long the Post Office had known of  
127

1 you want to look at it.

2 **A.** 65, was that?

3 **Q.** So we've got the Second Sight Interim Report picking up  
4 the three bugs --

5 **A.** Correct.

6 **Q.** -- of 8 July 2013, and then this, seven days later.

7 **A.** Yes.

8 **Q.** We can see, if we go to the last page, which is page 14,  
9 the date of the -- the date of Mr Clarke's advice. If  
10 we go back to page 1, it's an "Advice on the Use of  
11 Expert Evidence Relating to the Integrity of the Fujitsu  
12 Services Horizon System". The Inquiry is very familiar  
13 with this, so I'm not going to go through it at length  
14 and, instead, take you to parts of it. Can we go to  
15 page 10, please, and paragraph 28. Mr Clarke says:  
16 "In considering this report [the Second Sight  
17 Report] I only take account of those matters indicating  
18 a prior knowledge of Horizon issues."  
19 Then he says:  
20 "The following paragraphs appear relevant", and then  
21 he cuts in extracts from the Second Sight Report.  
22 There at 6.5:  
23 "The first defect", that's the receipts and payments  
24 mismatch bug.  
25 Then at 6.6, the second defect, that's the local  
126

1 the existence of bugs nor, indeed, was he aware who at  
2 the Post Office had known, yes?

3 **A.** That's what it says, yes, I can see that.

4 **Q.** Keeping this in mind, in paragraph 46 of your witness  
5 statement, I'm not going to ask for it to be turned up  
6 at the moment, you tell us that, in relation to these  
7 three bugs, that, prior to publication of the interim  
8 report, your role was to collate and distil information  
9 for the use of others considering the Post Office's  
10 response to the interim report?

11 **A.** Yes.

12 **Q.** Yes?

13 **A.** Yes.

14 **Q.** Can you please help us; before the Second Sight Report,  
15 had Mr Singh ever informed you that, in fact, he had  
16 been the prosecutor in the case against Seema Misra?

17 **A.** I don't know about that particular status but I remember  
18 seeing an email exchange where, when I was asked to --  
19 I think we referred to it this morning, I was asked to  
20 see if -- I contacted Bond Dickinson and DAC Beachcroft  
21 to see if bugs had been referred to in any cases and  
22 I saw that Jarnail seemed to have known about that, the  
23 *Misra* case in that but I don't recall --

24 **Q.** I'm asking specifically whether, before the Second Sight  
25 Report, Mr Singh had ever told you that he was in fact  
128



1 the prosecutor in the case of Seema Misra?  
 2 **A.** I don't recall that, no.  
 3 **Q.** Did he, before the Second Sight Report, tell you that  
 4 having been the prosecutor in the *Seema Misra* case, that  
 5 he had been told about the Callendar Square or Falkirk  
 6 bug --  
 7 **A.** I don't recall that.  
 8 **Q.** -- back in 2010?  
 9 **A.** Yeah, I don't recall that being said, no.  
 10 **Q.** That he had been told about a locking issue in Horizon  
 11 that had caused transactions to be lost?  
 12 **A.** I don't recall that, no.  
 13 **Q.** Did he tell you before or at this time that he had been  
 14 told back in 2010 that there were some 200,000 system  
 15 faults recorded in relation to Horizon?  
 16 **A.** I don't recall that, no.  
 17 **Q.** Did he tell you that part of the work that Fujitsu had  
 18 undertaken in the prosecution of Seema Misra was to  
 19 provide an estimate of what would be involved in  
 20 providing the defence with all change requests made at  
 21 the Horizon counter but that the Post Office had decided  
 22 not to go through with that work?  
 23 **A.** I'm not aware of that, no.  
 24 **Q.** Did Mr Singh tell you at that is time or before this  
 25 time that both he and Rob Wilson, the then Head of

129

1 Was there any sense at this time, mid-2013, around  
 2 the time of the publication of the Second Sight Report,  
 3 that the Post Office was essentially saying this  
 4 information about the three bugs is newly acquired  
 5 information by Post Office?  
 6 **A.** It's -- I'm pausing to answer because it seemed to be  
 7 new to some people within POL, hence the -- you know,  
 8 the request to try to find the information and package  
 9 it up and present it to people. But by the same token  
 10 we seemed to be able to get answers to it.  
 11 **Q.** Are you saying that when the Interim Report came out and  
 12 these three bugs were mentioned, that was news to some  
 13 people within Post Office but not to everyone?  
 14 **A.** It was certainly news to some people and what I don't  
 15 know is, having been able to find people within the  
 16 business with some understanding of it, I don't think  
 17 I ever found out whether they'd started that enquiry at  
 18 the same time I had or had prior knowledge of it. So it  
 19 was certainly new to some people.  
 20 **Q.** Did you seek to ascertain when the Post Office had first  
 21 become aware of those three bugs?  
 22 **A.** I think that came out with some of the -- I didn't  
 23 proactively seek to find that out. I just tried to find  
 24 out what we knew and, through that, it was clear that --  
 25 I think somewhere in there there's a date that says,

131

1 Criminal Law, had been personally informed about the  
 2 receipts and payments mismatch bug back in 2010?  
 3 **A.** I don't recall that no.  
 4 **Q.** That they had been engaged in discussions and  
 5 conferences as to whether or not to disclose that  
 6 information about the receipts and payments mismatch bug  
 7 to Seema Misra's defence team --  
 8 **A.** No, I don't recall.  
 9 **Q.** -- and that a decision had been made not to give  
 10 disclosure.  
 11 **A.** I'm not aware of that, no.  
 12 **Q.** If we can turn up paragraph 46 of your witness  
 13 statement, please. Paragraph 46, at the foot of  
 14 page 23. You say you have been asked to comment by us  
 15 on your knowledge in mid 2013 of the "local suspense  
 16 bug":  
 17 "I have been referred ... to some emails mentioning  
 18 it from around the same time as those relating to the  
 19 'Callendar Square bug' ... I believe that [the Post  
 20 Office had brought the 'local suspense bug', along with  
 21 the 'receipts and payments mismatch bug ... to Second  
 22 Sight's attention. The context in which I came to deal  
 23 with these bugs was the same as I have described above  
 24 ... and my role again was to collate and distil  
 25 information ..."

130

1 "We've known about this since", I did a timeline where  
 2 I think it was amended to include a date, but that  
 3 wasn't a line of inquiry, it was more a consequence of  
 4 my request for --  
 5 **Q.** Wasn't that line of inquiry an important one to  
 6 ascertain when the Post Office had first become aware of  
 7 those three bugs?  
 8 **A.** Probably, yeah, I would say --  
 9 **Q.** Would you go as far as definitely?  
 10 **A.** Yes.  
 11 **Q.** I mean, if I give you an example, wasn't that  
 12 information critical to determining which prosecutions  
 13 might be tainted if full disclosure of the existence of  
 14 those bugs had not been given?  
 15 **A.** I have to say questions like that, I wasn't aware of at  
 16 the time. I had no idea of what the impact on  
 17 prosecutions might have been when I was being asked to  
 18 find information about the bugs.  
 19 **Q.** Wasn't that information that was of prime relevance to  
 20 which, if any, subpostmasters' contracts may have been  
 21 wrongly terminated?  
 22 **A.** Possibly, it depends on the basis of termination,  
 23 I think.  
 24 **Q.** Wasn't that information, ie "when did me in Post Office  
 25 know about the existence of these three bugs," relevant

132

1 to the issue of which, if any, of Mr Jenkins' evidence  
 2 may have been tainted?  
 3 **A.** That's a criminal law matter so I can't give a view on  
 4 that, I'm afraid.  
 5 **Q.** To your knowledge, did anyone seek to ascertain which  
 6 department or which individuals within such departments  
 7 knew about the existence of those three bugs?  
 8 **A.** I'm not aware of that, no.  
 9 **Q.** Do you know why not?  
 10 **A.** I'm sorry, I don't.  
 11 **Q.** "We've got this report that says there were these three  
 12 bugs. When did we, Post Office, first know about them  
 13 and how does that affect the proceedings that we've  
 14 brought against people, whether civil or criminal, and  
 15 how does it affect contracts that have been terminated?"  
 16 **A.** Well, I think there are two parts to that question.  
 17 There's -- the first bit is when did we first know about  
 18 that? Well, that seemed to be coming out from the  
 19 request for information about the bugs, that the use of  
 20 that -- as a segue, was it important to find out but  
 21 I think it was being found out, from what I could see.  
 22 Somebody said "Well, we first knew about it on this  
 23 date, we told Fujitsu about it on that date". That's  
 24 with respect to one of the two bugs, I can't remember  
 25 whether we did it for both.

133

1 Post Office was pretending that the Second Sight Report  
 2 was revelatory of matters that it didn't know about  
 3 when, in fact, that simply wasn't the case?  
 4 **A.** Well, again, I don't know if I can speak for the whole  
 5 company but there was -- I didn't get the sense of  
 6 anybody pretending anything.  
 7 **Q.** Can we --  
 8 **A.** I didn't see any artifice around me, if that helps.  
 9 **Q.** Can we turn to actions arising from the Second Sight  
 10 Interim Report. Can we turn up, please, POL00006799,  
 11 I think that's B79.  
 12 **A.** Thank you. Yes.  
 13 **Q.** If you go to the last page, please. You'll see that  
 14 this is Mr Clarke's Further Advice of 2 August 2013 and,  
 15 if we go to page 1, please, and paragraph 2, in  
 16 paragraph 1, he says:  
 17 "On 3 July I attended [the Post Office] in  
 18 conference at ... Head Office ..."  
 19 So this is an Advice written a month later where he  
 20 is summarising or reflecting back what had happened at  
 21 a conference on 3 July. Then in paragraph 2 he says:  
 22 "One of the topics considered by the conference was  
 23 that of disclosure: I advised that there ought to be  
 24 a single, central hub, the function of which was to act  
 25 as the primary repository for all Horizon-related

135

1 What its impact was fed into -- was being shared  
 2 with, certainly, the criminal lawyers at the time, who  
 3 would advise on what the impact of that for prosecutions  
 4 would be.  
 5 **Q.** Did you get any sense, working as you did within the  
 6 Post Office at a relatively senior level here, of the  
 7 Post Office reacting as though Second Sight's report was  
 8 revelatory of matters that it did not know about?  
 9 **A.** Yes, I did have that impression.  
 10 **Q.** At this time, mid-2013, did you know that there is  
 11 evidence that the Post Office first knew about the  
 12 Callendar Square/Falkirk bug way back in 2006?  
 13 **A.** I think if it's Falkirk/Callendar Square, I think that  
 14 seemed to have been a known issue in the company.  
 15 **Q.** We've got evidence that Fujitsu had told the Post Office  
 16 about the receipts and payments mismatch bug in 2010 and  
 17 we've got evidence that the Post Office had known about  
 18 the existence of the suspense account bug in 2012. In  
 19 fact, knowing about it before Fujitsu did. Did those  
 20 kind of -- did that information come to the surface at  
 21 the time of the publication of the Second Sight Report?  
 22 **A.** The only thing I can remember coming to the surface was,  
 23 I think, the 2012 one. When we first knew it, I don't  
 24 recall, I'm sorry.  
 25 **Q.** Did you gain any sense at this time, mid-2013, that the

134

1 issues. [It] would collate, from all sources into one  
 2 location, all Horizon-related defects, bugs, complaints,  
 3 queries and Fujitsu remedies, thereby providing a future  
 4 expert witness, and those charged with disclosure  
 5 duties, with recourse to a single information point  
 6 where all Horizon issues could be identified and  
 7 considered. The rationale behind the advice at the  
 8 arrived from the need to protect [the Post Office] from  
 9 the current situation repeating itself in the future."  
 10 What did you understand "the current situation" to  
 11 be referring to, the risk of which there was  
 12 a repetition?  
 13 **A.** I think bugs surfacing, which those who ought to be  
 14 aware of them weren't.  
 15 **Q.** Can we turn, please, with that context in mind, to  
 16 POL00191968, B57.  
 17 **A.** Yes.  
 18 **Q.** You'll see it's your email of 12 July to Mr Scott,  
 19 copied to others, including Ms Crichton, Mr Flemington  
 20 and Mr Singh, with the subject of "Regular call re  
 21 Horizon Issues". So I think, putting the chronology  
 22 together, this is after the conference that we've seen  
 23 summarised by Mr Clarke of 3 July 2013, yes?  
 24 **A.** Yes.  
 25 **Q.** You say:

136

1 "... following [a call] earlier today, I set out  
2 a draft email to go to the various 'Heads of' regarding  
3 a weekly call during which any Horizon related issues  
4 can be raised with the wider business."

5 You ask for comments. Then you say:

6 "... someone from Bond Dickinson should participate  
7 in the calls we have with Cartwright King so that our  
8 criminal law lawyers and civil law lawyers are aware of  
9 what the other is doing. This will be especially  
10 important as further Spot Reviews come in, which may  
11 raise issues relevant to the prosecutions Cartwright  
12 King are pursuing."

13 Then the text of the email:

14 "We are instigating a regular conference call during  
15 which issues with Horizon, user experience and training  
16 support can be shared across and known to the various  
17 business units which use and rely on the system.

18 "[This] will aim to ensure that Horizon issues are  
19 brought to the attention of user groups who might not be  
20 aware of the issues, but whose use of Horizon may be  
21 affected by them.

22 "To make sure we have all user groups covered, we  
23 need to have a representative from each of the following  
24 teams ..."

25 Then you set them out and you ask for

137

1 necessary, development to take matters forward.

2 **Q.** So did you see it as a development caused by the  
3 circumstances that the Post Office had got itself  
4 into --

5 **A.** Yes.

6 **Q.** -- rather than there ought always to have been a process  
7 by which information or evidence that was potentially  
8 relevant to prosecutions was routinely collated,  
9 recorded and made available?

10 **A.** Sorry, I'm struggling to hear. Sorry. There are two  
11 parts there, again, I had the first but lost the second,  
12 I'm sorry.

13 **Q.** Were you seeing this as a development that arose because  
14 of the circumstances that the Post Office found itself  
15 in --

16 **A.** Yes.

17 **Q.** -- rather than something that always ought to have been  
18 in existence, namely a process by which information and  
19 evidence potentially relevant to prosecutions was  
20 routinely collated, recorded and made available to  
21 prosecutors?

22 **A.** Yeah, I can't comment on the second part of it. I don't  
23 know whether it ought to have been there or not but it  
24 certainly seemed to be something that needed to be put  
25 in place now.

139

1 representatives to be put up, yes?

2 **A.** Yes.

3 **Q.** Can we go to paragraph 69 of your witness statement,  
4 please, which is on page 35.

5 **A.** Thank you. Yes.

6 **Q.** You say in the third line, page 35, paragraph 69:

7 "My recollection is that the purpose behind the  
8 calls was for issues with Horizon to be raised and  
9 recorded so that there would be visibility of them  
10 across the business and to avoid operating in silos.  
11 I also recall that [the Post Office's] external criminal  
12 lawyers were keen to have these calls so as to create  
13 a record of Horizon issues which they could consider for  
14 disclosure in prosecutions."

15 **A.** Yes.

16 **Q.** That can come down, thank you. Would you accept that  
17 the advice that Mr Clarke had given, that we've seen  
18 about the creation of a central repository, reflected no  
19 more and no less than a duty that the Post Office had  
20 always been subject to, to retain and record information  
21 that was potentially relevant to its prosecutorial  
22 function?

23 **A.** I don't think I can make that jump on whether it's part  
24 of the prosecutor's duties or had or had not been. It  
25 certainly seemed to be, to me, a pragmatic, in fact

138

1 **Q.** Did it seem to you, even as somebody who was not expert  
2 in criminal law, surprising that it was only in 2013  
3 that steps were taken to ensure that material was not  
4 held in silos?

5 **A.** Yes.

6 **Q.** In relation to this proposed hub or forum, were  
7 technical specialists from the Post Office and Fujitsu  
8 invited to attend and contribute to them?

9 **A.** I certainly think from the Post Office side there was,  
10 I don't recall about Fujitsu.

11 **Q.** We've seen the cast list, the departmental cast list  
12 that was previously set out, I don't think there's  
13 anyone from Fujitsu on that, is there?

14 **A.** No, I don't think so, no.

15 **Q.** Why was that?

16 **A.** I don't -- I don't know. I may have put that together  
17 quickly and I had a place holder. I don't know why it's  
18 not there, I don't think it was -- sitting here today  
19 I don't think it was a deliberate omission, put it that  
20 way.

21 **Q.** You don't think it was?

22 **A.** I don't think it was a deliberate omission, I just --

23 **Q.** Well, if the intention or purpose of the hub was to  
24 avoid operating in silos, why weren't Fujitsu invited to  
25 attend?

140

1 **A.** I have to say when I put that together I was still  
2 trying to get my head around how things worked.  
3 I didn't know who the right people were, which is why  
4 I had a place holder in the draft for other -- I don't  
5 know whether we had the internal capacity to deal with  
6 it ourselves. I think I had subsequently come to know  
7 that we didn't have the internal capacity. When I wrote  
8 that email, I wouldn't have known either way, I don't  
9 think.

10 **Q.** Going back, then, to Mr Clarke's first advice -- we  
11 skipped forward to his second to see something he had  
12 written about an event that had occurred in July. In  
13 paragraph 80 of your witness statement, which is on  
14 page 40, you say:

15 "The Inquiry has invited me to comment on two ...  
16 pieces of advice ..."

17 I've not taken you to the 19 July one yet. Then  
18 about five lines in, you say:

19 "I do ... recall that the 15 July 2013 advice raised  
20 Cartwright King's serious concerns about evidence which  
21 Gareth Jenkins had provided in prosecutions. I believe  
22 ... that those concerns would have been taken forward as  
23 appropriate [the Post Office's] criminal lawyers and  
24 recall there being a general consensus following this  
25 advice that Gareth Jenkins could no longer be used as

141

1 **A.** Which tab is this one at, sorry? Is it 76?

2 **Q.** B65.

3 **A.** I beg your pardon. So it's between -- thank you.

4 Thank you.

5 **Q.** If you look at paragraphs 33 to 35, did you form  
6 a view -- never mind the implications for historic  
7 convictions -- but did you form a view that the Post  
8 Office could no longer reasonably maintain that the  
9 Horizon system was robust in the light of, in  
10 particular, the opinion at paragraph 35?

11 **A.** Okay, I'm sorry, I've read that. Could I have the  
12 question again, please?

13 **Q.** Did you form a view that the Post Office could not  
14 reasonably maintain that the Horizon system was robust  
15 or had been robust in the light of Mr Clarke's opinion,  
16 in particular that at paragraph 35?

17 **A.** No, I didn't.

18 **Q.** Did you think that it was still open to the Post Office  
19 to say that, notwithstanding the advice it had received,  
20 it could say that Horizon was a robust system and the  
21 data that it produced had integrity?

22 **A.** I think that's -- it's -- to me, I don't think so and  
23 I don't think so because it's conflating quite a lot,  
24 some isolated examples, admittedly in an extremely  
25 serious context, I totally acknowledge that. But

143

1 a witness in criminal proceedings."

2 Were you personally concerned by the advice given in  
3 relation to Mr Jenkins and its potential impact on the  
4 safety of historic prosecutions?

5 **A.** Again, there are sort of two parts to that question.

6 Was I concerned? I saw there was concern from the  
7 criminal lawyers advising Post Office, so I assumed that  
8 wasn't -- I assumed that was well founded. I should say  
9 that's a positive thing. Quite how it would impact past  
10 prosecutions isn't something I could comment on.

11 **Q.** Did you form a view that some past convictions that had  
12 been founded upon Mr Jenkins' evidence were unsafe or,  
13 at least, were potentially unsafe?

14 **A.** I've never been able to form a view on the safety of  
15 convictions, I'm sorry.

16 **Q.** So you didn't?

17 **A.** I didn't know either way. It's what I could see is that  
18 the right people seemed to have raised it and would know  
19 what to do with it and they seemed exercised by it.

20 That is my recollection. But quite what the impact of  
21 it would be, I had no frame of reference to measure it  
22 or judge it by.

23 **Q.** Can we, please, go back to Mr Clarke's advice.  
24 POL00040000. Can we turn up page 11 and look under  
25 "Discussion".

142

1 I think in terms of the reliability and robustness of  
2 the system as a whole, you look at the operation of the  
3 system as a whole, which was what Post Office was doing,  
4 it was being used every day, and --

5 **Q.** There's so many thousand transactions --

6 **A.** Exactly, exactly.

7 **Q.** -- there's so many million customers, 1 billion a year,  
8 that line?

9 **A.** Yes, it's not a line, it is what was happening every  
10 day.

11 **Q.** It was the line though, wasn't it? That was the line to  
12 take, wasn't it?

13 **A.** Well -- no, it -- I'm sorry, that has a pejorative  
14 connotation to it --

15 **Q.** Absolutely.

16 **A.** -- what you're saying, and I don't believe it was, but  
17 it's -- it is a line that was used, yes.

18 **Q.** Why were the concerns about Mr Jenkins not taken to the  
19 police to investigate?

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

21 **Q.** Was there any discussion of that?

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

23 **Q.** Was there any discussion of which you were a party or of  
24 which you were aware that the police should be called in  
25 to investigate here?

144

1 A. I don't recall that.

2 Q. Was there any investigation conducted by the Post  
3 Office, of which you're aware, into Mr Jenkins and the  
4 matters that had been raised in Mr Clarke's advice?

5 A. I don't recall, no.

6 Q. Were any instructions given as to how the information  
7 contained in Mr Clarke's advice was to be handled and  
8 disseminated?

9 A. I don't recall any discussions to that, no.

10 Q. Was a decision made as to whether or not the information  
11 contained in the advice should be disclosed to past  
12 defendants, possible appellants, civil claimants,  
13 against the Post Office?

14 A. At that time -- this was arising at the time where Post  
15 Office's disclosure duties in prosecutions was being  
16 considered. I don't know the extent to which the  
17 specific Jenkins witness evidence -- or this particular  
18 advice, I don't know to what extent that folded into it.  
19 So I think the answer is -- I'm sorry, if you give me  
20 the question again, I think I can answer it.

21 Q. I'll put it another way. Do you know why the  
22 information in Mr Clarke's advice concerning Mr Jenkins  
23 was not disclosed until the criminal appeals in November  
24 2020?

25 A. I don't know why it was -- I don't know why it wasn't

145

1 concerns about this employee of Fujitsu with Fujitsu?

2 A. So I worked with Womble Bond Dickinson to work out  
3 an approach that we could -- correspondence and a means  
4 by which we could raise the issue with Fujitsu, which we  
5 started off, I think, by looking at drafting a letter  
6 that would put it -- bring it to their attention.

7 Q. Mr Williams, one conclusion that might be drawn from the  
8 fact that the Post Office or part of it acted as if the  
9 three bugs raised by Second Sight was revelatory, that  
10 no one investigated what knowledge the Post Office in  
11 fact had of the three bugs, and when, and no one  
12 disclosed the Post Office's view that the expert that it  
13 had placed reliance on was discredited was that the Post  
14 Office that now entered a cover-up mode; is that true?

15 A. Again, there's quite a lot of things that don't --  
16 I think you're asking was -- could somebody see that?  
17 I think somebody probably could see that.

18 Q. Is it factually correct? Was a decision made, "Let's  
19 not find out when we, in fact, knew about all of these  
20 bugs; let's at least some of us pretend this is  
21 revelatory"?

22 A. That wasn't the impression I had.

23 Q. "Let's not disclose to convicted defendants that we have  
24 taken this view of an expert, who has given evidence or  
25 a witness who has given evidence, either in writing or

147

1 disclosed.

2 Q. That can come down from the screen, thank you. Given  
3 that Mr Clarke's advice about Mr Jenkins concerned the  
4 probity and integrity of one of the architects of the  
5 system, Mr Jenkins himself, was consideration given to  
6 whether that had a wider implication on the reliability  
7 of the Horizon system itself?

8 A. I don't recall that, no.

9 Q. Were the concerns about an employee of Fujitsu, to your  
10 knowledge, then discussed with Fujitsu?

11 A. No, I don't know.

12 Q. What did you try to do to ensure that people in Fujitsu  
13 who needed to know this information got the information  
14 that one of their employees had, according to the Post  
15 Office, been given discreditable or tainted evidence in  
16 court?

17 A. I'm sorry, can I check the privilege point on that  
18 because we're dealing with --

19 Q. No, just answer the question.

20 A. Okay, I'm sorry.

21 Q. If somebody wants to take a point on privilege --

22 A. I'm sorry, I beg your pardon.

23 Q. -- they'll stand up.

24 A. Thank you, can I have the question again, please?

25 Q. What steps were taken, to your knowledge, to raise any

146

1 orally in court, that we're now entering into a phase of  
2 seeking to cover up what's happened."

3 A. I think to do that, that requires a positive decision,  
4 and I'm not aware of that decision having been made, or  
5 communicated to me or I became aware of that in any way.  
6 I accept actions weren't taken but whether that  
7 was -- I haven't -- I wasn't aware of anything that said  
8 that was a deliberate choice.

9 Q. So you're not aware of any sort of master plan, as it  
10 were, that said, "Let's not investigate when we, in  
11 fact, knew about this; let's, to the outside world,  
12 suggest that Second Sight has uncovered something about  
13 which we didn't know. Let's not tell convicted  
14 defendants about the view we've taken of Mr Jenkins'  
15 evidence". There was no meeting of that kind or  
16 instruction of that kind?

17 A. Not that I was aware of, in any way --

18 Q. Did you view --

19 A. -- or that I recall, anyway. I mean, I think I would  
20 have remembered something like that but I don't recall  
21 that, no.

22 Q. Did you view the issue raised by Mr Clarke's advice as  
23 relating solely to the Post Office's past criminal  
24 prosecutions?

25 A. Yes.

148

1 Q. Accordingly, did you not consider the potential impact  
2 on past civil actions?  
3 A. No, I didn't.  
4 Q. Did anyone do that?  
5 A. I don't believe so.  
6 Q. As a lawyer with significant experience of civil  
7 litigation, at the centre of the team that was dealing  
8 with Horizon at the time, if anyone had considered the  
9 potential impact on civil proceedings, you would have  
10 been aware of it, wouldn't you?  
11 A. I would -- oh, yes, I would sorry. Yes.  
12 Q. What did you, in fact, do as a result of the receipt of  
13 the 15 July Simon Clarke Advice?  
14 A. Well, I think I read it.  
15 Q. And put it away?  
16 A. I suspect, yes, it was being dealt with by what  
17 I considered to be the -- what appeared to me, I should  
18 say, to be the people who were advising the business on  
19 the steps that should be taken. I'm not sure that what  
20 I saw in there necessarily impacted other activities in  
21 the business. He hadn't -- I don't know, I wasn't aware  
22 of him giving evidence for any live proceedings at that  
23 time where the particular issues raised in here were  
24 germane.  
25 Q. Going back to the advice, please. POL00040000, and  
149

1 Q. It was an important issue that demanded answers?  
2 A. I don't know what the issue -- what the follow-on steps  
3 from it were because that was for those with the  
4 expertise to advise on.  
5 Q. Was it not considered imperative to ascertain the  
6 circumstances in which Mr Jenkins had given written and  
7 oral evidence in some Post Office prosecutions and,  
8 according to Mr Clarke, had breached his duties to the  
9 court?  
10 A. I really can't comment on matters of the criminal  
11 justice system. I just had no familiarity with it and  
12 what was required or not required. I'm sorry.  
13 Q. Did you ask questions of Mr Singh or, indeed, any other  
14 of the lawyers in the department or engaged in  
15 discussions with them as to whether Mr Jenkins had been  
16 properly instructed as to his or an expert's duties of  
17 disclosure?  
18 A. That I think I recall raising orally with Cartwright  
19 King.  
20 Q. What was the answer you got back?  
21 A. I'm sorry?  
22 Q. What was the answer you got back?  
23 A. I don't recall one.  
24 Q. Did you ever see any instructions which the Post Office  
25 had provided to Mr Jenkins that might properly set out  
151

1 page 13, please. Under Mr Clarke's "Conclusions":  
2 "What does this all mean? In short, it means ..."  
3 I'm going to replace the text with the correct name:  
4 "... that [Mr Jenkins] has not complied with his  
5 duties to the court, the prosecution or the defence."  
6 Then paragraph 38:  
7 "The reasons as to why [Mr Jenkins] failed to comply  
8 with his duty are beyond the scope of this review."  
9 So in 37, Mr Clarke advised that Mr Jenkins had not  
10 complied with his duties to the court, the prosecution  
11 or the defence, and 38 said the reasons why he failed to  
12 comply are beyond the scope of his, Mr Clarke's, review,  
13 correct?  
14 A. Yes.  
15 Q. Do you agree, therefore, that it left that question very  
16 much widely open?  
17 A. I wouldn't have said very much widely open, I think  
18 I would have said, if there were actions to be taken,  
19 I would have expected them to have been advised on next  
20 steps -- what else is to be done.  
21 Q. Well, you would agree, I think, with this, that the  
22 reasons why Mr Jenkins failed to comply with the duty  
23 was an important issue.  
24 A. That certainly seemed to be what the criminal lawyers  
25 were saying.

150

1 his duties to the court?  
2 A. I haven't seen that but, also, I didn't -- I didn't look  
3 for it.  
4 Q. When you read this advice, did it give rise to any  
5 concern in your mind that what you read might be  
6 indicative of any broader prosecutorial failings by the  
7 Post Office?  
8 A. No, because I didn't know enough about the prosecutorial  
9 process to know where it may lead. It certainly seemed  
10 to be addressed seriously by those who understood the  
11 context in which it was relevant. So I don't know where  
12 else it would have gone beyond that, I'm afraid.  
13 Q. Were you aware of any discussion within Post Office  
14 Legal at this time as to whether the appropriate course  
15 might be actually to speak to Mr Jenkins to understand  
16 events from his perspective?  
17 A. I don't recall that, no.  
18 MR BEER: Sir, thank you. That's a convenient moment. It's  
19 just up to 3.10 now, might we break until 3.25?  
20 SIR WYN WILLIAMS: Yes, of course.  
21 MR BEER: Thank you, sir.  
22 (3.07 pm)  
23 (A short break)  
24 (3.25 pm)  
25 MR BEER: Sir, good afternoon. Can you see and hear us?  
152

1 **SIR WYN WILLIAMS:** Yes, I can, thank you.  
 2 **MR BEER:** Thank you very much.  
 3 In the next set of questions, Mr Williams, please  
 4 don't worry about questions of privilege, they have been  
 5 resolved between the Inquiry and the Post Office.  
 6 **A.** I apology.  
 7 **Q.** No need to apology. Can we look, please, at  
 8 POL00193383.  
 9 Can you see at the foot of the page there's an email  
 10 from you to Lesley Sewell, Susan Crichton, Simon Baker  
 11 and Hugh Flemington of 11 August 2013, and you say:  
 12 "Lesley  
 13 "Please find attached two drafts of a letter to put  
 14 us 'on the record' with Fujitsu about the issues raised  
 15 in Second Sight's Interim Report, and the impact of them  
 16 on the court proceedings we bring.  
 17 "The drafts differ in tone:  
 18 "The 'shot cross the bow' aims to put pressure on  
 19 [Fujitsu] to work with us to improve Horizon and user  
 20 confidence in it;  
 21 "The 'letter of claim' goes further, tying the  
 22 issues to our contract with [Fujitsu] and escalating  
 23 them through its dispute resolution procedure.  
 24 "In either case, we need to set out what we want  
 25 [Fujitsu] to do. That should set the tone for the  
 153

1 investigations are ongoing. In particular, Second Sight  
 2 highlighted the following areas of concern", and can you  
 3 see that six are then set out?  
 4 **A.** Mm-hm.  
 5 **Q.** Yes?  
 6 **A.** Yes.  
 7 **Q.** Along with a note saying, "This list is taken from  
 8 Second Sight's Report -- [the Post Office] needs to  
 9 carefully consider whether responsibility for these  
 10 criticisms falls on Fujitsu or [the Post Office]."  
 11 Then over the page:  
 12 "It is noted the above criticisms are a product of  
 13 only an Interim [Review] ... we know there are a number  
 14 of other potential allegations. Further details of  
 15 these issues will be presented once received from Second  
 16 Sight.  
 17 "One major area for concern is the scope and quality  
 18 of Fujitsu's support to Post Office in Court  
 19 proceedings. Where appropriate, Post Office commences  
 20 criminal prosecutions against subpostmasters believed to  
 21 have acted criminally. It also brings civil proceedings  
 22 ...  
 23 "Data from Horizon is integral to the success of  
 24 these court actions. It is imperative that this data  
 25 is, and is seen to be, reliable. Perceptions of  
 155

1 letter -- the more aggressive we are, the more defensive  
 2 (and therefore less supportive) [Fujitsu] are likely to  
 3 be."  
 4 Can we look, please, at POL00140620.  
 5 **A.** Can I get a bundle reference?  
 6 **Q.** Yes, E77.  
 7 **A.** B?  
 8 **Q.** E77.  
 9 **A.** Yes, thank you. I have it. Thank you.  
 10 **Q.** This is headed up "Letter of Claim" and it appears to be  
 11 one of the two attachments to your email, albeit I'm not  
 12 clear whether it's the "shot across the bows" letter, or  
 13 the formal letter of claim letter. I don't think that  
 14 matters for present purposes because it's the content  
 15 that I wanted to discuss with you. Can you see it's  
 16 a draft letter to Fujitsu and says it's a letter to  
 17 claim pursuant to the practice direction?  
 18 In the background, it says:  
 19 "... Post Office has commissioned an independent  
 20 inquiry into Horizon which is being conducted by Second  
 21 Sight."  
 22 The report was published on the 8 July:  
 23 "Although the Report found no evidence of  
 24 system-wide problems with Horizon, a number of  
 25 criticisms were levied against the system and further  
 154

1 weakness in the system or any suggestion that Post  
 2 Office or Fujitsu is attempting to hide weaknesses,  
 3 seriously undermines our credibility and significantly  
 4 increases the complexity and the costs of court  
 5 proceedings."  
 6 This is the paragraph I wanted to ask you about:  
 7 "Post Office was therefore disappointed to discover  
 8 that witness evidence prepared by Fujitsu may not have  
 9 been fully disclosing historic (albeit known and  
 10 resolved) defects. This has let Post Office having to  
 11 review all its historic criminal prosecutions for the  
 12 last three years (since the rollout of [Horizon Online])  
 13 to ensure that it has not breached its duties of  
 14 disclosure under the Criminal Court rules."  
 15 Was your reference to the witness evidence prepared  
 16 by Fujitsu a reference to the witness evidence of  
 17 Mr Jenkins?  
 18 **A.** I think it must have been, yes.  
 19 **Q.** Was it the case that the Post Office discovered, by the  
 20 Second Sight Report, that he, Mr Jenkins, may not have  
 21 been fully disclosing historic defects?  
 22 **A.** Sorry, the question again? You said from the Second  
 23 Sight Report?  
 24 **Q.** Yes, was it the case that the Post Office only  
 25 discovered from the Second Sight Report that witness  
 156

1 evidence prepared by Mr Jenkins may not have fully  
 2 disclosed defects in Horizon?  
 3 **A.** That seemed to me to be the case.  
 4 **Q.** What investigation had taken place by the time of you  
 5 drafting this letter in August 2013 to be able to say  
 6 that it was only the Second Sight Report that had caused  
 7 the Post Office to discover those facts?  
 8 **A.** I'm not sure, I'm sorry. I think the question is what  
 9 investigations. I don't think any investigations were  
 10 undertaken so my -- I think it must have been that that  
 11 was the perception, the feeling, although, I have to  
 12 say, this is also a draft, so we may have invited  
 13 comment on it before progressing.  
 14 **Q.** It's about that perception and feeling that I want to  
 15 ask you. Remember before the break I asked you  
 16 questions about pretending that it was only upon the  
 17 publication of the Second Sight Report that the Post  
 18 Office discovered facts that Mr Jenkins may not have  
 19 been fully disclosing historic defects in Horizon. This  
 20 is an example of that, isn't it?  
 21 **A.** The perception that it was -- yes, it would be, yes --  
 22 **Q.** That it was a new discovery?  
 23 **A.** Yes.  
 24 **Q.** A new fact?  
 25 **A.** Yes.

157

1 sorry.  
 2 **Q.** Thank you. Could you translate what the first part  
 3 says, please?  
 4 **A.** It appears to be "Draft BPs".  
 5 **Q.** Yes?  
 6 **A.** So the first piece is "Horizon-FJ positioning". Then it  
 7 appears to be "Draft BPs".  
 8 **Q.** So if we can expand that first bit, please. "Draft", is  
 9 that bullet points?  
 10 **A.** It might be. That seems sensible but I don't know.  
 11 **Q.** Then carry on translating please?  
 12 **A.** "Reports didn't contain all they should have.  
 13 "Reluctance to deal with known issues.  
 14 "As a consequence", which would be consequence.  
 15 Sorry, do you want it verbatim?  
 16 **Q.** Yes, keep going.  
 17 **A.** "... necess [which would be necessary] to review cases  
 18 to determine to whether or not a partic deft ..."  
 19 **Q.** Particular defendant?  
 20 **A.** Correct:  
 21 "... was prejudiced by absence of info."  
 22 **Q.** Then scroll down, please. If you look at the next bit  
 23 "Copies of Advice", can we blow that up, please. Just  
 24 under the part we were looking at?  
 25 **A.** I can probably do that from here "Copies of Advice

159

1 **Q.** I'll ask you again: what had been undertaken within the  
 2 Post Office to discover whether that was true or not,  
 3 that this was the discovery of a new fact, as opposed to  
 4 something that the Post Office had, in fact, known about  
 5 all along, the existence of the three bugs?  
 6 **A.** We didn't do anything, I don't think.  
 7 **Q.** Can we turn, please, to POL00155555. This is  
 8 a manuscript note dated 2 September 2013. The  
 9 authorship is not shown on the document but do you  
 10 recognise the writing?  
 11 **A.** It's mine.  
 12 **Q.** You wrote this?  
 13 **A.** I think so. It looks like mine, yes.  
 14 **Q.** It appears to have been written by somebody, ie you, who  
 15 had read Simon Clarke's advice of 15 July 013. It  
 16 refers to conversations with Martin Smith of Cartwright  
 17 King and Brian Altman KC. Can you see, if we pan out  
 18 a little bit, please --  
 19 **A.** Can I have the reference --  
 20 **Q.** Yes.  
 21 **A.** -- please? Just to help --  
 22 **Q.** E96.  
 23 **A.** Thank you.  
 24 **Q.** Are you at E96?  
 25 **A.** Yes, sorry, I am. I've just been reading it. I'm

158

1 [arrow] Share under a common interest privilege."  
 2 **Q.** Can you help us, to whom was the advice to be shared  
 3 under a common interest privilege?  
 4 **A.** I anticipate that would have been with Fujitsu.  
 5 **Q.** Did that happen?  
 6 **A.** I don't believe so.  
 7 **Q.** Do you know why it didn't happen?  
 8 **A.** No.  
 9 **Q.** Then carrying on, please, the six statements.  
 10 **A.** "6 statements as examples -- might [underlined] be 'tech  
 11 correct' [which would be technically correct, I imagine]  
 12 but no in substance."  
 13 **Q.** So six statements as examples might be technically  
 14 correct but not in substance.  
 15 **A.** Yes, I think it might be missing a T.  
 16 **Q.** Yes? And you've written that against paragraph 34 of  
 17 the advice?  
 18 **A.** It does look right.  
 19 **Q.** Then underneath please?  
 20 **A.** "It goes to Fairness/[I think that might be] obligations  
 21 to do justice."  
 22 **Q.** Then next "Telephone to MS"?  
 23 **A.** Yeah, that's right:  
 24 "Int Report revealed existence of bugs."  
 25 **Q.** Then underneath does that say, "Clashed with Gareth"?

160



1 A. I think it does, yes.  
 2 Q. Then to the right-hand side of the squiggle?  
 3 A. Then I've got:  
 4 "[Without] this [that will be 'would've', would  
 5 have] continued [with] premise all is okay (as per GJ)."  
 6 Q. What does that mean? What are you saying in this note  
 7 here? Are you referring, firstly, to a telephone  
 8 conversation with Martin Smith --  
 9 A. Yes.  
 10 Q. -- of Cartwright King?  
 11 A. Yeah, I'm going -- without this, I think that may be --  
 12 I'm -- I fear I might be speculating a little bit  
 13 because it's been a long time but "would have continued"  
 14 presumably with prosecution activities, "with premise  
 15 that all is okay".  
 16 Q. As per Gareth Jenkins?  
 17 A. "As per Gareth Jenkins".  
 18 Q. So translating that, do you think that possibly means  
 19 "Without the Second Sight Report we would have continued  
 20 to prosecute on the premise that all is okay, as Gareth  
 21 Jenkins said it was"?  
 22 A. I think that's right yes.  
 23 Q. Thank you. Then the box over to "Second Sight Report".  
 24 A. "SS Report [equals] he tells of bugs not mentioned in  
 25 his statements."

161

1 "We do have an issue with how we share the info."  
 2 Q. What was the issue and sharing with whom?  
 3 A. I don't know what that's relating to. I don't --  
 4 Q. Do you remember I asked you earlier about whether the  
 5 Post Office had considered whether it needed to disclose  
 6 the information in Mr Clarke's advice about a view that,  
 7 essentially, Mr Jenkins was a tainted witness, he had  
 8 breached his duties to the court, needed to be shared  
 9 with convicted defendants? Do you think that was part  
 10 of your discussion with Mr Smith?  
 11 A. That's plausible but I don't know. It's -- having --  
 12 Q. Why were you discussing these things with Mr Smith if  
 13 your expertise was not in criminal law?  
 14 A. I don't know. I may have been just the one who was  
 15 asked to see what we did but I'm certainly speaking to  
 16 Martin Smith, who does have the expertise. Sorry, I do  
 17 know why -- I beg your pardon. Sorry, it's come back to  
 18 me. One of the outcomes of the Second Sight Report was  
 19 dealing with Fujitsu and I was asked to sort of help  
 20 with that. That was sort of on my agenda.  
 21 Q. Underneath Martin Smith and I think that says  
 22 "inference" --  
 23 A. Yes.  
 24 Q. -- can you tell us what bullet point (1) is?  
 25 A. I think that's:

163

1 Q. Yes, and then on the right-hand side?  
 2 A. His [statements] say we have lists to check but doesn't  
 3 say [what types -- what -- oh, I'm sorry] what happens  
 4 as an outcome."  
 5 Q. Okay, then scrolling down, please. You asked the  
 6 question, "What else?!?"  
 7 A. Yes.  
 8 Q. Is that a note to yourself?  
 9 A. I don't know, it's -- certainly, it's my note, so --  
 10 I don't quite no what that's referring to.  
 11 Q. Do you think it means --  
 12 A. There might be other bugs, I think that's -- I'm trying  
 13 to --  
 14 Q. Yes, if it's been discovered that Mr Jenkins has said to  
 15 Second Sight -- ie he tells of bugs -- Mr Jenkins said  
 16 things to Second Sight about bugs that were not  
 17 mentioned in his statement, what else is there to  
 18 discover about what Mr Jenkins has not said?  
 19 A. I mean, that might be correct. I don't recall what  
 20 I was putting that to, but ...  
 21 Q. Okay:  
 22 "We do have an issue" --  
 23 A. "With how" --  
 24 Q. -- is the next line.  
 25 A. Yeah:

162

1 "System designed to look for bugs, but doesn't  
 2 mention any.  
 3 "By implication, there are none [because] none are  
 4 mentioned."  
 5 Q. Then to the right-hand side, dealing with this page as  
 6 we go down, you've written:  
 7 "So -- we know of some of these ...  
 8 "What were we doing to instruct [Gareth Jenkins]?"  
 9 Do you remember I asked you before the break --  
 10 A. That looks like --  
 11 Q. -- the question of what the Post Office had done to  
 12 discover the instructions that it had given to Gareth  
 13 Jenkins were, and you said you don't think consideration  
 14 was given to that or you couldn't recall any  
 15 consideration?  
 16 A. No.  
 17 Q. It appears that such consideration was given by you?  
 18 A. I thought I did say that I'd raised it with Martin  
 19 Smith. I thought I did say that in my answer?  
 20 Didn't I? I thought I did. I beg your pardon.  
 21 Q. What was the product of your discussion with Martin  
 22 Smith, then, as to the issue of what the Post Office had  
 23 done properly to instruct Gareth Jenkins?  
 24 A. I don't know from this. I don't think any actions were  
 25 taken.

164

1 Q. Was there any introspection at all here by the Post  
2 Office, "To what extent do we, as Post Office, bear  
3 a responsibility for what has been revealed by  
4 Mr Clarke's 15 July advice"?

5 A. Oh, yes, I would think so, and, on that, we'd have been  
6 asking those who advise on the appropriate -- who raised  
7 the issue on the appropriate steps to take next.

8 Q. Was anything specifically done to answer the question  
9 that you raise there, "What were we doing to instruct  
10 Gareth Jenkins"?

11 A. Sorry, the question again? I'm still familiarising  
12 myself with the document, I'm afraid, sorry.

13 Q. What was done to take that issue forwards, to your  
14 knowledge? Discovering what the Post Office had done  
15 properly to instruct Gareth Jenkins?

16 A. I don't know that anything was done.

17 Q. Was there any sense that you're aware of, "Let's best  
18 not answer that question because we might not like the  
19 answer"?

20 A. Not that I recall, but ...

21 Q. Carrying down on the left-hand side, please:  
22 "M Smith."  
23 First point:  
24 "Don't think ..."

25 A. "Don't think has ever been advised of his duties."

165

1 Limited on the charge sheet. We owe duties to the  
2 court. There needs to be some investigation here of  
3 what we, the Post Office, have done wrong, if anything.  
4 Can you look that, please, Martin", rather than lumping  
5 it all on Mr Jenkins?

6 A. I don't know if we were doing that. This was  
7 a discussion on how to take something forward with  
8 Fujitsu with the criminal lawyer and I would have  
9 expected through this, given I'm not a criminal lawyer,  
10 for the advice on what's appropriate or not to be taken  
11 to be coming in that -- or from the expert.

12 Q. Underneath, does that say "started with Misra 2010"?

13 A. Yes.

14 Q. Then if you can read the final three bullet points on  
15 that page.

16 A. "Has turned up since (but not given)."

17 Q. So does that mean, do you think, in context, Mr Jenkins  
18 had turned up to court since 2010, since *Misra*, but  
19 hadn't given evidence as, in fact, was the case?

20 A. That's my understanding, yes, I think that's right.

21 Q. "His duty is to the court."

22 A. Yes.

23 Q. Then what does the last bullet point say?

24 A. It seems to say:  
25 "Seem to rely on this -- CK haven't done anything

167

1 Q. Who's the "he"?

2 A. That must be Mr Jenkins, I think. Must be Mr Jenkins  
3 sorry, my voice dropped.

4 Q. So your criminal law expert was telling you that he  
5 didn't think that Mr Jenkins had ever been advised of  
6 his duties. What was done as a result of that?

7 A. Again, I don't know, I'd been looking to Martin Smith  
8 for the reaction to that.

9 Q. But you're the company lawyer, aren't you? You're the  
10 Post Office lawyer, and your external lawyer is telling  
11 you "We don't think this expert, who Simon Clarke has  
12 written a very powerful advice about, with very  
13 concerning and difficult conclusions in, was ever  
14 advised by the Post Office or anyone of his duties";  
15 what did you do with that information?

16 A. I do recall but I cannot say as in the context of this,  
17 I remember in the various discussions I may have had  
18 with Martin over the time that, if there was action we  
19 needed to take, they --

20 Q. So what action was taken?

21 A. None but it was saying, you know, if you tell us we need  
22 to do something, I genuinely think Post Office would  
23 have been doing it.

24 Q. Well, did you say back "That's an important point. We,  
25 after all, are the prosecutors here. It's Post Office

166

1 since."

2 Q. Do you know what that means?

3 A. No, I'm sorry.

4 Q. Then the final part on the right-hand side of the page,  
5 underneath the part that was double underlined, "Signed  
6 statements ..."

7 A. "... after telling SS of the bugs."

8 Q. Does that mean that Mr Jenkins -- or you were being told  
9 that Mr Jenkins had continued to sign witness statements  
10 that didn't make mention of bugs, even after telling  
11 Second Sight of the bugs?

12 A. I think so, yes.

13 Q. We'll come to that later in this phase.  
14 "[Fujitsu] will say", can you translate the rest,  
15 please?

16 A. "It's up to defence council to raise the issue."

17 Q. Do you know what that is? Is that Mr Smith speaking  
18 there?

19 A. I don't know, I don't know who put that. It may have  
20 been me, it may have been him.

21 Q. Can you help us with the context of that, ie "Fujitsu  
22 will say it's up to defence counsel to raise the issue"?

23 A. My guess is, in terms of bringing this to the attention  
24 of Fujitsu, they'll say, "Well, you were conducting the  
25 prosecutions, you should have told them 'It's your

168

1 fault'."

2 **Q.** Then the last part on that page, in the bottom right?

3 **A.** I think it's:

4 "Wholly affected -- [I think that might say 'it's

5 cute]."

6 Then it's:

7 "Are FJ legal review this?"

8 **Q.** "Are [Fujitsu] legal reviewing this", yes?

9 **A.** And then quotes:

10 "And correctly account for it'.

11 "Misleading."

12 **Q.** Can you help us with what that note means?

13 **A.** No, I'm sorry, I don't know what "this" is.

14 **Q.** Well, one of these employees might have breached their

15 duties to the court, presumably?

16 **A.** I don't know. I'm sorry. I don't know if that is --

17 **Q.** Okay, over the page, please, to page 3. Is this

18 a continuation of the same note?

19 **A.** Quite possibly, yes.

20 **Q.** Can you help us with what the first part means?

21 **A.** It says:

22 "[Fujitsu]: this is how we did it and confirm."

23 **Q.** Yes?

24 **A.** "Plus we don't do 'bug free' -- it's up to you what you

25 do [with] the system.

169

1 an expert witness, in breach of its own legal duties,

2 then that was serious?

3 **A.** Well, I didn't know what the duties -- what Post

4 Office's duties were, which is -- as a prosecutor --

5 which was speaking to the criminal lawyers.

6 **Q.** We've seen a note which says, "We don't think he has

7 ever been advised of his duties"; did you think that was

8 serious?

9 **A.** Well, I don't know. I'm not sure in the civil context,

10 when we -- oh, no, we didn't with experts, you're right.

11 So yes, yes, I do think it's serious.

12 **Q.** Why were you having this conversation with Mr Smith?

13 **A.** Well, because we wanted to raise it with him -- we

14 thought it needed to be raised with Fujitsu. That is --

15 what are we going to raise with Fujitsu?

16 **Q.** The type of issues we see discussed here, namely

17 a record of a witness continuing to sign witness

18 statements that failed to mention bugs, even though he's

19 told Second Sight about them; a record of the breach by

20 the witness of his duties to the court; a realisation

21 that he, it is said, has not been advised of his duties

22 to the court; were they, to your knowledge, ever raised

23 with the Post Office Board?

24 **A.** I don't know with the Board, I think they were put in --

25 there are other drafts of letters to Fujitsu, I think --

171

1 "Plus (per CK) [defence] counsel should raise this."

2 **Q.** Is this Mr Smith telling you what he thinks Fujitsu

3 might say, you recording what you think Fujitsu might

4 say, or something else?

5 **A.** I don't know now, I'm sorry.

6 **Q.** Then I think the rest is either irrelevant or

7 ascertainable and irrelevant.

8 Do you think, by this time, the Post Office had

9 realised that it had failed to instruct Mr Jenkins

10 properly as an expert witness?

11 **A.** Yes, I -- Post Office employee, so yes.

12 **Q.** If the Post Office had failed to instruct Mr Jenkins

13 properly as an expert witness in accordance with its,

14 the Post Office's, own legal duties, would you agree

15 that that was a serious issue?

16 **A.** If we'd been advised it was, yes.

17 **Q.** Would you not regard it as serious of itself, without

18 having to be told?

19 **A.** In this context, I mean, we knew it was serious, because

20 it had been raised but what to do with it? Again, I --

21 I'm sorry, can have the question again?

22 **Q.** If it was the case that, as this note may indicate -- it

23 can come down, incidentally -- that the Post Office

24 through you realised or had been advised that the Post

25 Office had failed to instruct Mr Jenkins properly as

170

1 **Q.** Yes, I'm talking --

2 **A.** -- which were --

3 **Q.** We can see what said in that draft letter.

4 **A.** Yes, there were others.

5 **Q.** I'm asking where else that information was directed?

6 **A.** I --

7 **Q.** Was it sent up to the board, to your knowledge?

8 **A.** I -- no, not to my knowledge, no.

9 **Q.** Was Second Sight told about it?

10 **A.** No, not to my knowledge.

11 **Q.** Was the Mediation Scheme Working Group told about it, to

12 your knowledge?

13 **A.** I don't know whether they were or weren't.

14 **Q.** Was Mr Altman KC told about it?

15 **A.** Of the issue with Gareth Jenkins?

16 **Q.** No, the -- I'm taking it beyond the issue with Gareth

17 Jenkins. I'm talking about a realisation that the Post

18 Office itself may have failed to instruct Mr Jenkins

19 properly as to his duties?

20 **A.** Quite possibly not. Put it this way: I don't recall him

21 being told that, no.

22 **Q.** Was it to your knowledge raised with the CCRC?

23 **A.** No, not unless that sort of came out from the advice

24 notes we've had, no.

25 **Q.** To your knowledge, was the first time that the Post

172

1 Office acknowledged to any external body that Mr Jenkins  
 2 had not been properly instructed as an expert until this  
 3 Inquiry?  
 4 **A.** Quite possibly, yes. Oh, it may -- I don't know, it may  
 5 have come out in the Court of Appeal proceedings.  
 6 **Q.** I don't think there was any, from memory, direct  
 7 acknowledgement in the Court of Appeal proceedings by  
 8 the Post Office that that was so?  
 9 **A.** I'm sorry, I'm speculating there. I beg your pardon.  
 10 **Q.** Can we turn, please, to POL00125758. I'll give you the  
 11 tab number in a moment.  
 12 B176, Mr Williams.  
 13 **A.** 176?  
 14 **Q.** Yes, B176. Have you got that?  
 15 **A.** I beg your pardon, yes, I have. Sorry.  
 16 **Q.** You'll see this is a speaking note for a meeting with  
 17 the CCRC on 8 May 2015.  
 18 **A.** Yes.  
 19 **Q.** You can see who the attendees were intended to be. From  
 20 Post Office's side you and the General Counsel,  
 21 Ms McLeod.  
 22 **A.** Mm-hm.  
 23 **Q.** Did you write this speaking note?  
 24 **A.** I think -- I think I may well have done.  
 25 **Q.** Yes, and if we just scroll through it please, you

173

1 From your knowledge and understanding, was that the  
 2 first time that the attribution of branch losses was  
 3 raised? In early 2012?  
 4 **A.** I think -- I don't know when PMs started attributing  
 5 branch losses.  
 6 **Q.** You knew I think about the *Castleton* case?  
 7 **A.** Yes.  
 8 **Q.** So he had been doing it in -- making that suggestion in  
 9 the early 2000s?  
 10 **A.** Correct, yes.  
 11 **Q.** You knew about the Seema Misra case and she had been  
 12 making that suggestion in 2009 and 2010?  
 13 **A.** Correct.  
 14 **Q.** Did you know about the Computer Weekly article that  
 15 summarised half a dozen or so subpostmasters who said  
 16 exactly the same thing?  
 17 **A.** I'm aware of that article now, I don't quite know when,  
 18 but it was likely by this time that --  
 19 **Q.** By mid-2015 you would have been aware of the Computer  
 20 Weekly --  
 21 **A.** Yes, yes, absolutely.  
 22 **Q.** Okay, so is it right then that this is not supposed to  
 23 be a comprehensive account of when problems with Horizon  
 24 first arose?  
 25 **A.** No, I think what I've done here is PMs at some point

175

1 proposed to set out the background to the Complaint  
 2 Review and Mediation Scheme.  
 3 **A.** Mm-hm.  
 4 **Q.** Post Office as a retailer, it's the UK's largest branch  
 5 network; 11,500 branches, 8,000 agents; postmasters  
 6 handled Post Office's money; £70 billion in cash;  
 7 there's a duty to account, under contract and common on  
 8 law, under agency, for daily cash declarations, weekly  
 9 balances and monthly trading rollover periods; Post  
 10 Office monitors branch accounts, there's an audit if  
 11 questions about declared levels of cash holding; if  
 12 audit reveals a shortfall, then the Post Office seeks to  
 13 rock under a contractual right that shortfall, and you  
 14 quote in clause 12 of the contract; suspend;  
 15 termination; potential prosecution, if conduct is  
 16 suspected; prosecutions under the POA about 50 a year.  
 17 Over the page, please. Post Office uses the Horizon  
 18 accounting system in every branch, it's supplied by  
 19 Fujitsu. First introduced in 1995, online in 2010.  
 20 60,000 users or more, processing 6 million transactions  
 21 a day, 2 billion transactions a year. 500,000 users  
 22 since launch. The key principles of it, 2.3, some  
 23 postmasters started attributing branch losses to  
 24 Horizon. Early 2012, James Arbuthnot asked the Post  
 25 Office to look into it.

174

1 started attributing losses but then, in early 2012,  
 2 that's when Lord Arbuthnot --  
 3 **Q.** Okay --  
 4 **A.** -- I'm not seeking to say it started in 2012, I think  
 5 that's a --  
 6 **Q.** Okay, in 2012, Post Office instructs Second Sight to  
 7 look at some of the cases. The first report was in July  
 8 2013, and you cite the no evidence of  
 9 system-wide/systemic problems with Horizon software, but  
 10 issues with the way we dealt with individual  
 11 postmasters.  
 12 Post Office was very concerned about the impact on  
 13 criminal cases. It considered the July '13 report  
 14 against the prosecutors duty of continuing disclosure,  
 15 set up a "sift review" process. Suitability was checked  
 16 by Brian Altman, made disclosures as a consequence.  
 17 Revisited its approach to agent engagement.  
 18 Then 2.5.  
 19 "Scheme to resolve individual complaints."  
 20 You'll read what's summarised there.  
 21 **A.** Yes.  
 22 **Q.** Then over the page. 2.6:  
 23 "Focus of complaints continues to be ... processes  
 24 and practices."  
 25 The Second Sight investigations, you told the CCRC,

176

1 have shown that the majority of branch losses were  
2 caused by errors made at the counter.

3 Second Sight expressively accepts it is not  
4 an expert in criminal law and procedure but still, in  
5 Part Two, state the Post Office might not have  
6 investigated claims properly, have the evidential  
7 foundation to bring the criminal charge. These  
8 statements have entered the public domain and may  
9 encourage people to take action. Other avenues being  
10 pursued.

11 Then "Categories of Responsive Documents", under  
12 section 17 notices, if you just scroll to the end, you  
13 enter into a practical discussion about provision of  
14 material, yes?

15 **A.** Yes.

16 **Q.** Why is there no mention there of what the Post Office  
17 had found out about Mr Jenkins?

18 **A.** I think, by this stage, we had disclosed -- we may have  
19 disclosed the Brian Altman advice reviewing the -- what  
20 I understood the impact of the Jenkins issue was, was  
21 that it triggered Post Office's duty to make further --  
22 to consider further disclosure in cases --

23 **Q.** Of the Second Sight Report?

24 **A.** Of the Second Sight -- of the materials that we'd been  
25 advised to disclose, which I think was, in some cases,

177

1 **A.** -- if that was done. I don't want to mislead. That's  
2 my recollection but I'd like to check it.

3 **Q.** Why wasn't it something volunteered?

4 **A.** I don't know. We -- some things were volunteered,  
5 I think, but it wasn't a --

6 **Q.** I'm asking about this one.

7 **A.** No particular reason. The material they asked for was  
8 provided, it indicated what else there might be and  
9 I don't know at this time, but certainly the process we  
10 had going forward with them was not to show them what we  
11 thought they might be interested in but for them --

12 **Q.** To rely --

13 **A.** -- to conduct on their -- yeah, well, for them to  
14 conduct their investigation and follow the lines of  
15 inquiry that they would want to. That was the repeated  
16 advice I recall us receiving, is the CCRC would conduct  
17 their own investigations and should be left to it.

18 **Q.** Can we look, please, at POL00103238. I'll just wait for  
19 Mr Stevens to turn that up. POL00103238, B182, please.

20 **A.** B182. Thank you. Yes.

21 **Q.** Can we turn to page 2, please, and scroll down. We can  
22 see an email here of 1 August 2016 and, if we scroll on,  
23 please -- if we keep going -- we can see that it's sent  
24 by Amanda Pearce, the group leader of the CCRC. If we  
25 go back to the beginning of the email, please. She

179

1 the Second Sight Report and in some cases -- most cases  
2 I thought it was both -- the Helen Rose Report. That  
3 process had been reviewed by Brian Altman and the advice  
4 on that had, I think -- although I'd like to check the  
5 dates -- been shared with the CCRC by the 8 May 2015.  
6 If it hadn't been it was around the time of this, it was  
7 disclosed --

8 **Q.** The Simon Clarke advice --

9 **A.** Er --

10 **Q.** -- of 15 July 2013?

11 **A.** I don't think the Cartwright King advices were shared.

12 **Q.** Why was that?

13 **A.** We tended to respond to requests for information from  
14 the CCRC and we -- it was -- the Cartwright King advice  
15 was referred to in Brian's advice and we invited the  
16 CCRC to tell us which documents they would like from it,  
17 and some of those were, I believe, provided, but not  
18 those. I think that's what --

19 **Q.** How would the CCRC know about the Clarke advice?

20 **A.** It would have been referenced, I think, I hope -- well,  
21 I can -- they would only know, I think, if it's properly  
22 referred to in Brian's advice.

23 **Q.** Mr Altman's advice?

24 **A.** Would you like me to check to see whether that --

25 **Q.** No, it's okay --

178

1 says:

2 "Hi Rodric ..."

3 Then under "Documents":

4 "I'm afraid I've also got some further requests for  
5 information and documents."

6 Under "Documents":

7 "We met with Ron Warmington of Second Sight ... He  
8 mentioned a couple of documents we think it would be  
9 helpful to see (i) the thematic spreadsheet which Second  
10 Sight created identifying the alleged faults/problems;  
11 and (ii) a June 2014 report which Mr Warmington prepared  
12 on [the Post Office's] Investigations Department and  
13 prosecution process. I attach a section 17 notice to  
14 cover this request ...

15 "2. We are trying to locate the transaction logs  
16 for the Misra case. We haven't been able to find them  
17 in the data room. We have found a 255-page 'event log'  
18 and a 29-page log of 'Transactions ...' but no sign of  
19 the full transaction logs. If the logs weren't printed  
20 out for trial are you still able to access them ...  
21 (... I haven't sent a ... section 17 ..."

22 Then scroll down:

23 "1. In November 2015, Computer Weekly reported  
24 an issue whereby payments had been duplicated on  
25 Horizon. It was reported that this was used by the user

180

1 forcing log off. We have also seen this referred to as  
2 the 'Dalmellington Error'. Would it be possible for POL  
3 to provide us with an explanation of this issue ...

4 "2. We've seen numbered of references to the  
5 'Receipts and Payments Mismatch Problem' which, we  
6 think, has also been referred to as the Callendar  
7 Square/Falkirk problem. Are we right in thinking that  
8 they're the same thing ...

9 "3. We've seen references to some sort of 'fault  
10 log' produced by [Horizon]. I understand ... that this  
11 has been variously referred to as the 'PEAK incident  
12 reports', 'PinICL', and the 'Known Error Log'. Do these  
13 refer to the same thing? Is it one document or is it  
14 a series of documents ... I'm trying to get a better  
15 sense of what they are ..."

16 Agree all very relevant, direct and penetrating  
17 questions?

18 **A.** Yes.

19 **Q.** Can we scroll up, please, to page 2 and keep going to  
20 the top of page 2, there, thank you. You send this on,  
21 if we just look at the bottom of page 1. That's from  
22 you. You send that email on to Andrew Parsons and  
23 others and say, "Can we discuss it?":

24 "I'd like to start thinking about whether and how we  
25 can start forcing the issue with the CCRC -- they've

181

1 Weekly. I think the -- I mean, I'll be frank, I think  
2 that's just me writing a short email. I think what  
3 I was trying to actually do is, what Post Office's  
4 approach to the CCRC had been was to, as I said before,  
5 leave them -- and that was the consistent advice, leave  
6 them to their investigations. They knew what they were  
7 doing and how they would go about it.

8 I think, around this time, because the Group  
9 Litigation had started -- I think it started what, in  
10 April 2016 -- there was some discussion around how long  
11 does this take? That's a question I was frequently  
12 asked. I thought it important to at least think about  
13 testing what had been our position and to see whether it  
14 was still viable and valid. Is how we've been dealing  
15 with this appropriate? Should we be thinking about  
16 doing something else? And that's what I was trying to  
17 do there, you know, is this is an ever-expanding, you  
18 know, running down a rabbit hole, as I seem to have  
19 intimated there or should we stick to what we had been  
20 doing and what I believe we continued to do, which is to  
21 engage with them as they required from us.

22 **Q.** It's that siege mentality again, isn't it, Mr Williams?  
23 Challenges to the Post Office are hostile and must be  
24 fended off, rather than considered on their merits?

25 **A.** I think that's maybe overstating it but it's -- there's

183

1 been looking at these for a long time and seem to be  
2 jumping down every rabbit hole they're directed to ..."

3 Why did you think the CCRC was jumping down rabbit  
4 holes?

5 **A.** Two reasons, I think now. The Computer Weekly issue was  
6 the -- I think it referred to an outreach bug, which  
7 I think, when we'd discussed it -- I don't know where it  
8 came from -- seemed to have been a recent event. I'm  
9 not sure whether that actually is the case or not but  
10 that's what I recall being at the time. And I -- but  
11 I think, more pressingly, they'd asked for quite a bit  
12 of disclosure on an Employment Tribunal claim that, as  
13 far as I was seeing it, was an Employment Tribunal  
14 matter, not a -- it was unrelated to any prosecution  
15 material and it just -- what I think was going on there  
16 was what we had -- certainly, my impression of what we  
17 were seeing was lots of people raising lots of issues  
18 that would get looked into and not go anywhere, and just  
19 extend the period of review without reaching  
20 conclusions.

21 **Q.** You've just agreed with me a couple of minutes ago that  
22 the questions that the CCRC were raising with you were  
23 relevant, direct and penetrating issues. Why did you  
24 think they were going down rabbit holes?

25 **A.** I think -- I've just said, for example, the Computer

182

1 probably something in that, I think that's fair.

2 **Q.** You say that they're being directed to rabbit holes.  
3 Were you paranoid that others were acting in concert  
4 with the CCRC?

5 **A.** I had -- well, I'd said "seemed to be". I didn't know  
6 whether these were things they got to on their own or  
7 with prompting but I'm quite sure they would have been  
8 doing what they do with us, which is their own  
9 investigation impartially.

10 **Q.** Did you think they were lacking impartiality?

11 **A.** No, not in any way.

12 **Q.** Why did you want to force the issue with the CCRC?

13 **A.** I wanted to start thinking about whether we can. As  
14 I say, to me this is testing is our approach still the  
15 right one? And it turns out, I believe, as are  
16 subsequent actions -- it was the right one, to continue  
17 to lead them to do the job as best they knew.

18 **Q.** Is there really an option there? On the one hand, we  
19 should leave the statutory body that investigates  
20 possible unsafe convictions and miscarriages of justice  
21 to get on with its work, or we stand in their way?

22 **A.** I don't think so but I was often asked -- I seem to  
23 recall being asked "When are they getting back? What  
24 can we do?" And it helped me to be able to say, "Look  
25 this is the approach we've been taking. You know, we

184

1 are keeping it under review, we test it, and it is still  
 2 the right thing to do", even if it seems, as you just  
 3 said, you know, frankly obvious. I think it's important  
 4 to keep things under review.

5 **Q.** Can we look at a different aspect of this, please. And  
 6 turn to paragraph 76 of your witness statement -- that  
 7 can come down now -- which is on page 38.

8 **A.** Sorry, yes.

9 **Q.** I think that must be a rogue reference. I'll move on,  
 10 POL00066789, which is tab B64. This is an email chain  
 11 between you and Mr Smith regarding disclosure of the  
 12 Helen Rose Report. You remember what the Helen Rose  
 13 Report was?

14 **A.** Yes.

15 **Q.** Can you, for those less familiar, summarise your present  
 16 understanding of what the Helen Rose Report was?

17 **A.** I think the Helen Rose Report -- it is unfortunate, we  
 18 tried for a while to have it referred to as the Lepton  
 19 report because it concerned a branch rather than  
 20 an individual -- was an issue raised by a member,  
 21 I think, of Post Office's Security Team in connection  
 22 with an issue revved by Second Sight's Spot Review --  
 23 ultimately thorough a Spot Review, on -- I actually  
 24 can't remember what the technical piece is, but it's how  
 25 system reversals, I think, are visible from information

185

1 section) or the non-privileged material (eg the  
 2 background transaction data) repackaged for disclosure  
 3 to the defence.

4 "If you advise that Helen's report does not attract  
 5 any privilege, please ensure the reference to privilege  
 6 is removed from the header (I don't want someone else to  
 7 say the report is privileged, but that we waived thereby  
 8 giving rise to possibly difficult issues of collateral  
 9 waiver)."

10 So you were asking Mr Smith why the report was being  
 11 disclosed first, yes?

12 **A.** Yes.

13 **Q.** And you were asking for advice on its privileged status.  
 14 On what basis did you consider the report to be  
 15 privileged?

16 **A.** Well, I wasn't sure whether it was privileged or not,  
 17 which is why I was asking the question. But I had  
 18 understood, when this came out, that the report, as in  
 19 the physical report, had been prepared for -- for the  
 20 purposes of obtaining legal advice, as in "Here's  
 21 an issue, what do we do?"

22 **Q.** So what did you think that occasion of privilege was?  
 23 Obtain legal advice about what?

24 **A.** Well, whether it raised issues that needed to be  
 25 disclosed.

187

1 derived from Horizon.

2 **Q.** Thank you.

3 **A.** A question about whether it was the reversal was  
 4 generated by the system or by a user.

5 **Q.** Can we turn, please, to page 4 of this chain. At the  
 6 foot of the page, in the context of the case against  
 7 Mr Ishaq in July 2013, Martin Smith sending a copy of  
 8 a letter to Mr Flemington and copied to you, to be sent  
 9 to Mr Ishaq's solicitors. Then up the page, please --  
 10 keep going -- we can see your reply on 10 July 2013:  
 11 "Thanks Martin.  
 12 "First point? We presume that Helen Rose's report  
 13 is being disclosed because [the Post Office's] evidence  
 14 in the prosecution included an ARQ report. Is that  
 15 right?  
 16 "Second point -- Helen Rose's report is marked  
 17 'Confidential and legally privileged'.  
 18 "I understand she did this because she prepared the  
 19 report to give to Post Office Legal for legal advice on  
 20 the implications of her investigation (please call on  
 21 [her number] to confirm).  
 22 "Please therefore consider what information from the  
 23 report needs to be disclosed to Mr Ishaq's solicitors  
 24 and in what format, ie whether parts of the report  
 25 should be removed or redacted (eg the Recommendations

186

1 **Q.** No, why did you think it was possibly the case that the  
 2 Helen Rose Report enjoyed privilege?

3 **A.** It's the same, because I thought it had been prepared to  
 4 give to the Post Office Legal for advice. We found this  
 5 issue, what are the legal implications, Post Office  
 6 Legal? That's -- whether that actually was the case or  
 7 not, I don't know, which is why I was asking Martin  
 8 Smith what his view on it was. And it was marked  
 9 privileged, which I know isn't determinative of  
 10 anything, but somebody thought it was privileged and  
 11 I wanted to know -- not having any familiarity with the  
 12 criminal justice system --

13 **Q.** In any event --

14 **A.** -- I -- I wanted the expert to tell us what to do.

15 **Q.** If we move up, please, to page 1., at the foot of the  
 16 page, Mr Smith says:  
 17 "Rodric ..."  
 18 Then there's an explanation of privilege. Second  
 19 sentence:  
 20 "I guess here you suggest that such privilege  
 21 attaches because of by reason of [the Post Office's]  
 22 contemplation of adversarial proceedings involving  
 23 Fujitsu."  
 24 Is that right? You thought that Helen Rose's  
 25 report --

188

1 A. No.  
 2 Q. No?  
 3 A. No.  
 4 Q. That's just way off beam?  
 5 A. It was, yes.  
 6 Q. "... in criminal litigation, the emphasis is on ensuring  
 7 a defendant is not prejudiced by the absence of material  
 8 which would otherwise assist him or undermine the case  
 9 against him ... criminal disclosure law trumps civil  
 10 privilege, but only in circumstances where the material  
 11 in question meets the test for disclosure ..."  
 12 Quite a lot in there.  
 13 "Thus there are only a limited number of ways in  
 14 which we can prevent disclosure of material which we  
 15 would otherwise be required to disclose to defendants."  
 16 Then over the page.  
 17 "Seek a Public Immunity [I think that's meant to  
 18 mean "public interest immunity"] Certificate from the  
 19 trial judge as we did in [another case]. To achieve  
 20 this we would need to demonstrate a real public interest  
 21 in non-disclosure [or]  
 22 "Terminate the prosecution."  
 23 Then he sets out why Helen Rose's report is  
 24 disclosable.  
 25 If we go to page 3, second paragraph:  
 189

1 happened. I think I saw a version of it at some point  
 2 where it effectively went without the markings but,  
 3 certainly, that wasn't --  
 4 Q. Then, lastly on this topic, before the break, can we  
 5 look at POL00108163, please --  
 6 A. Yes.  
 7 Q. -- an email from you to Martin Edwards. Can you help us  
 8 with who he was?  
 9 A. He was, at this time, I think, the Chief Executive's  
 10 Chief of Staff.  
 11 Q. Within Post Office?  
 12 A. Within Post Office. I beg your pardon.  
 13 Q. If we scroll down to point (iii), the briefing can  
 14 address the issues we discussed yesterday, namely:  
 15 "Whether the 'Helen Rose Report' is in the public  
 16 domain (it's not) ..."  
 17 Then:  
 18 "I think it is sensible to keep references to the  
 19 Helen Rose Report to a minimum ..."  
 20 In what context were you advising the Chief of Staff  
 21 to keep any references to the Helen Rose Report to  
 22 a minimum?  
 23 A. I think, in this, you need to get -- this is a document  
 24 where the full trail, I think, is important in the  
 25 context of what's happening. I think I'd been asked --  
 191

1 "... I am in no doubt that this document is  
 2 disclosable ... if the matter were to come before  
 3 a *criminal* court the judge would without hesitation  
 4 order the disclosure in the appropriate case."  
 5 Then I think you gave your instructions on page 1:  
 6 "Please disclose all information from the report  
 7 that needs to be disclosed.  
 8 "... do so in the form of a new, standalone document  
 9 (Helen presented the info in the form she did so as to  
 10 provide it to the Legal Department for its view)."  
 11 Why did you want a new, standalone document?  
 12 A. I think it just separated that -- I think I said it  
 13 earlier. It just removed any question about what had  
 14 been prepared for. I had been told, I think by  
 15 Cartwright King, that you can give disclosure in the  
 16 form of disclosure notes, as opposed to the document  
 17 itself, and I had thought, look, they know what needs to  
 18 be disclosed from there, which is the key of it, you  
 19 disclose what needs to be disclosed, do it in a way that  
 20 sort of removes the question around this.  
 21 Q. Would that not have had the effect of obscuring the  
 22 context in which the report had been originally  
 23 generated?  
 24 A. Not necessarily. It could have been as simple as  
 25 removing the privileged piece, which I think is what  
 190

1 if we go -- can I have the tab reference, please?  
 2 Q. We'll give you the tab number. B84.  
 3 A. Sorry, that's 184. If we go all the way through to --  
 4 Q. Pages 4 and 5.  
 5 A. Yes, thank you.  
 6 Q. If we look at the foot of page 4 and on to page 5,  
 7 Mr Edwards sends you some text for a report to the CEO  
 8 on criminal cases.  
 9 A. Yes.  
 10 Q. The text is:  
 11 "Our criminal barrister, Brian Altman QC, has  
 12 completed his review of the approach we are taking to  
 13 reviewing cases that have been subject to prosecution,  
 14 in particular looking at whether we are complying with  
 15 our duty to disclose the findings of the Second Sight  
 16 Report to the defence teams ... His conclusion is that  
 17 our approach is 'fundamentally sound', providing us with  
 18 strong grounds to resist any formal review of our  
 19 prosecutions (for example by the [CCRC]). To date,  
 20 following several sifts our external firm of solicitors  
 21 has identified 11 cases where disclosure is required.  
 22 It is a matter for the defence to determine what action  
 23 they might take ..."  
 24 Then scroll up.  
 25 A. So, to put that in context, to the best of my  
 192



1 recollection is that the -- and I think it's in the --  
 2 it's in the heading, it's the CEO report. So a report  
 3 was prepared for the Chief Executive. I don't know to  
 4 whom, I assume it's the Board. It would be collected  
 5 from various parts of the business on matters that had  
 6 been -- were of interest to the Board, I don't know what  
 7 the criteria for that were, and then they would ask  
 8 whoever was around to give either approval, sign off the  
 9 writing.

10 So I don't know where the draft started from on that  
 11 but he was saying "Here's an extract from the CEO  
 12 report -- which you can see is relatively small, sort of  
 13 very high level -- what do you think?" That's what  
 14 I was asked to do.

15 So I then -- in the next one, I made some suggested  
 16 amendments.

17 **Q.** In the amended text we're looking at on the screen, you  
 18 added in the words that are emboldened and underlined?

19 **A.** Yes. That's right, and I think -- did I strike any out?  
 20 It doesn't look like it. Well, I think I replaced some  
 21 words where it felt like we might be overreaching.

22 **Q.** Then if we go to page 3, please.

23 **A.** It's at that point -- my understanding was the documents  
 24 being considered for -- through the Sift Review for  
 25 disclosure and past prosecutions was not just the Second

193

1 a minimum?

2 **A.** Well, to a minimum? Because -- I say this later on --  
 3 well, it generated a lot of activity about what it was  
 4 and what it involved, and I offered to go through it --

5 **Q.** Why did it generate activity about what it was and what  
 6 it involved?

7 **A.** Well, we can see here Martin says:

8 "Thanks ... Unfortunately I think I probably do need  
 9 to give Paula more information on this [this is on  
 10 page 2], as this is going to raise all sorts of  
 11 questions from her and the Board! Please could you send  
 12 me the report and any associated advice ..."

13 **Q.** Yes.

14 **A.** So then I go:

15 "Can we take some time to discuss?"

16 **Q.** Yes.

17 **A.** We agree, it's a quick -- Martin says:

18 "... it's probably better not to mention [the  
 19 report] specifically, as it will ... serve to confuse  
 20 things ..."

21 **Q.** Why would the mention of the report confuse things?

22 **A.** I don't know. That's a -- I don't know.

23 **Q.** Then we get to page 1 --

24 **A.** Yes.

25 **Q.** -- where you say:

195

1 Sight Report, but also the Helen Rose Report, and so  
 2 I introduced it in at this point saying, "Well, hang on,  
 3 it's not just that document; there are two of them".

4 **Q.** Mr Edwards asked you, at the foot of page 3:

5 "Is the Helen Rose Report a key part of the  
 6 disclosure? If so I think we'll need to include the  
 7 reference to it in square brackets below."

8 So is that him adding the text in that we've just  
 9 looked at?

10 **A.** Sorry, who is that? Is that -- I'm sorry, what am  
 11 I looking for in the highlighted section?

12 **Q.** Mr Edwards replied:

13 "Is the Helen Rose Report a key part of the  
 14 disclosure? If so I think we'll need to include the  
 15 reference to it in square brackets below."

16 So it looks like he has added those words in, "and  
 17 Helen Rose", in the text on page 4.

18 **A.** In the text on page 4 now?

19 **Q.** Yes. I don't want to spend too long on this --

20 **A.** Oh, yeah. No, I'm sorry --

21 **Q.** -- about the intricacies of drafting.

22 **A.** I beg your pardon. I think I'd added it in. It's not  
 23 in the --

24 **Q.** My only question was: on page 1 of the email, why did  
 25 you want to keep references of the Helen Rose Report to

194

1 "I think it is sensible to keep references to the  
 2 Helen Rose Report to a minimum ..."

3 My question is: why did you think it sensible to  
 4 keep references to the Helen Rose Report to a minimum?

5 **A.** So it was -- so the way I'd read this, it was a question  
 6 about what's being disclosed. The Helen Rose Report was  
 7 something that was being disclosed and, in the briefing  
 8 note we'd received -- which I think must have been from  
 9 Cartwright King, I attach a briefing note -- it says,  
 10 "It's unlikely to require disclosure in any further  
 11 cases". So in a short summary of matters in a larger  
 12 report on other things, as I understood it, it was  
 13 something that didn't appear to be a live issue going  
 14 forward.

15 **Q.** Live issue for who?

16 **A.** For disclosure, and then -- so it wasn't going to be  
 17 something that was continuing to be disclosed. Actions  
 18 weren't going to be continued to be taken with respect  
 19 to it, I think. And then I also added in that we --  
 20 Brian's view was that it added very little.

21 So I'm sitting here thinking I don't know if it's --  
 22 it doesn't seem, to me, to be particularly relevant  
 23 going forward.

24 **MR BEER:** Thank you.

25 Those are the only questions I ask today.

196

1 Sir, can we start at 9.45 am tomorrow? I'll pick up  
2 questioning with the shredding advice.  
3 **SIR WYN WILLIAMS:** Yes. Tomorrow, Mr Beer, we embark on  
4 a new form of procedure, do we not, in that the  
5 representatives of Core Participants will be given  
6 a 45-minute time slot, and I think three have claimed  
7 it, to ask questions of Mr Williams?  
8 **MR BEER:** That's right, sir.  
9 **SIR WYN WILLIAMS:** I'm just telling everyone now that, in my  
10 view, this will only work if people are scrupulous about  
11 using the time because the last thing we want is for the  
12 third person of the Core Participants tomorrow afternoon  
13 being truncated because the two before him (or her) have  
14 overrun.  
15 So it's 45 minutes each, and I propose to be  
16 ruthless about it, just for everybody to know.  
17 Mr Williams, overnight, I dare say you'll want to  
18 relax, if you can, but you won't want to talk to anybody  
19 about your evidence, I'm sure, and I know you understand  
20 that you shouldn't.  
21 **THE WITNESS:** I do, sir.  
22 **SIR WYN WILLIAMS:** So with that, I'll see you all tomorrow.  
23 **THE WITNESS:** Thank you, sir.  
24 **MR BEER:** Thank you, sir.  
25 **(4.34 pm)**

(The hearing adjourned until 9.45 am the following day)

**I N D E X**

RODRIC DAVID ALUN WILLIAMS (sworn) ..... 1

Questioned by MR BEER ..... 1

<p><b>MR BEER: [25]</b> 1/3 1/5 1/9 29/4 41/12 41/20 59/19 59/23 60/2 60/5 71/13 82/14 113/13 113/16 113/18 113/22 113/24 114/25 152/18 152/21 152/25 153/2 196/24 197/8 197/24</p> <p><b>SIR WYN WILLIAMS: [28]</b> 1/4 1/6 28/13 28/20 28/23 29/3 41/17 59/22 60/4 70/21 71/7 71/10 71/12 80/18 81/1 81/9 81/16 82/3 82/11 113/15 113/17 113/23 114/24 152/20 153/1 197/3 197/9 197/22</p> <p><b>THE WITNESS: [3]</b> 41/19 197/21 197/23</p> <hr/> <p>'</p> <p><b>'13 [4]</b> 11/13 108/3 108/5 176/13</p> <p><b>'17 [1]</b> 10/9</p> <p><b>'18 [1]</b> 11/14</p> <p><b>'And [1]</b> 169/10</p> <p><b>'anonymous' [1]</b> 94/11</p> <p><b>'briefing' [1]</b> 102/25</p> <p><b>'bug [1]</b> 169/24</p> <p><b>'bug' [1]</b> 127/14</p> <p><b>'Callendar [2]</b> 82/22 130/19</p> <p><b>'cherry-picked' [1]</b> 100/3</p> <p><b>'Confidential [1]</b> 186/17</p> <p><b>'customers' [1]</b> 36/6</p> <p><b>'Dalmellington [1]</b> 181/2</p> <p><b>'dominant' [1]</b> 3/12</p> <p><b>'event [1]</b> 180/17</p> <p><b>'experts' [1]</b> 50/4</p> <p><b>'Falkirk' [1]</b> 82/23</p> <p><b>'fault [1]</b> 181/9</p> <p><b>'fit [1]</b> 99/19</p> <p><b>'for [1]</b> 95/18</p> <p><b>'fundamentally [1]</b> 192/17</p> <p><b>'Heads [1]</b> 137/2</p> <p><b>'Helen [1]</b> 191/15</p> <p><b>'It's [2]</b> 168/25 169/4</p> <p><b>'joined [1]</b> 121/11</p> <p><b>'joined-up' [1]</b> 121/11</p> <p><b>'Known [1]</b> 181/12</p> <p><b>'letter [1]</b> 153/21</p> <p><b>'Living [1]</b> 42/22</p> <p><b>'local [1]</b> 130/20</p> <p><b>'news' [1]</b> 30/11</p> <p><b>'on [1]</b> 153/14</p>	<p><b>'PEAK [1]</b> 181/11</p> <p><b>'PinICL' [1]</b> 181/12</p> <p><b>'receipts [2]</b> 130/21 181/5</p> <p><b>'rule' [1]</b> 99/21</p> <p><b>'Second [1]</b> 55/11</p> <p><b>'sense [1]</b> 7/17</p> <p><b>'shot [1]</b> 153/18</p> <p><b>'Should [1]</b> 65/12</p> <p><b>'Spot [2]</b> 102/15 102/19</p> <p><b>'systemic' [1]</b> 55/15</p> <p><b>'tech [1]</b> 160/10</p> <p><b>'they [2]</b> 37/4 53/17</p> <p><b>'Transactions [1]</b> 180/18</p> <p><b>'user [1]</b> 30/14</p> <p><b>'user-friendliness' [1]</b> 30/14</p> <p><b>'what [2]</b> 72/12 72/13</p> <p><b>'whitewash' [1]</b> 100/4</p> <p><b>'would've' [1]</b> 161/4</p> <hr/> <p>-</p> <p><b>-- seemed [1]</b> 49/9</p> <p><b>-- think [1]</b> 49/10</p> <hr/> <p>.</p> <p><b>.' [1]</b> 65/16</p> <p><b>... [1]</b> 180/21</p> <p><b>... I haven't [1]</b> 180/21</p> <p><b>...' [2]</b> 37/4 180/18</p> <hr/> <p><b>0</b></p> <p><b>013 [1]</b> 158/15</p> <hr/> <p><b>1</b></p> <p><b>1 August [1]</b> 179/22</p> <p><b>1 billion [1]</b> 144/7</p> <p><b>1 November [1]</b> 98/22</p> <p><b>1.00 [1]</b> 113/13</p> <p><b>10 [5]</b> 46/1 46/11 55/8 126/15 186/10</p> <p><b>10 May [1]</b> 63/21</p> <p><b>10 years [2]</b> 19/5 82/24</p> <p><b>10-year [2]</b> 8/13 9/15</p> <p><b>100 [1]</b> 93/18</p> <p><b>100 pages [1]</b> 19/1</p> <p><b>100.20 [1]</b> 107/11</p> <p><b>104 [1]</b> 60/10</p> <p><b>106 [1]</b> 2/21</p> <p><b>11 [4]</b> 7/6 46/11 142/24 192/21</p> <p><b>11 August [1]</b> 153/11</p> <p><b>11 March [1]</b> 1/18</p> <p><b>11 years [1]</b> 44/8</p> <p><b>11,500 [2]</b> 38/7 174/5</p> <p><b>11.16 [1]</b> 59/24</p> <p><b>11.30 [2]</b> 59/21 60/1</p> <p><b>12 [1]</b> 174/14</p>	<p><b>12 days [1]</b> 47/1</p> <p><b>12 July [1]</b> 136/18</p> <p><b>12 years [2]</b> 108/21 109/3</p> <p><b>12.58 [1]</b> 113/19</p> <p><b>12/13 years [1]</b> 4/9</p> <p><b>13 [4]</b> 2/6 58/12 121/1 150/1</p> <p><b>130-odd [1]</b> 119/18</p> <p><b>131 [2]</b> 1/20 22/15</p> <p><b>131 pages [1]</b> 1/17</p> <p><b>137 [1]</b> 20/16</p> <p><b>14 [4]</b> 2/6 63/9 115/2 126/8</p> <p><b>14 October [1]</b> 84/3</p> <p><b>14,000 [9]</b> 73/23 74/3 75/5 75/8 75/13 79/6 81/9 82/7 114/19</p> <p><b>14,000-odd [2]</b> 74/17 76/19</p> <p><b>148 Old [1]</b> 104/7</p> <p><b>15 [3]</b> 97/20 97/23 165/4</p> <p><b>15 July [6]</b> 125/19 125/25 141/19 149/13 158/15 178/10</p> <p><b>152725 [1]</b> 52/9</p> <p><b>16 [1]</b> 115/14</p> <p><b>16 December [4]</b> 29/11 30/5 30/19 41/23</p> <p><b>16 November [1]</b> 95/13</p> <p><b>16 years [1]</b> 63/13</p> <p><b>169 [2]</b> 23/15 23/17</p> <p><b>17 [4]</b> 120/20 177/12 180/13 180/21</p> <p><b>175 [2]</b> 24/14 27/24</p> <p><b>176 [1]</b> 173/13</p> <p><b>18 [3]</b> 1/1 2/2 2/2</p> <p><b>184 [1]</b> 192/3</p> <p><b>19 [1]</b> 141/17</p> <p><b>19 January [1]</b> 46/25</p> <p><b>19 November [2]</b> 92/1 114/8</p> <p><b>19 October [1]</b> 72/8</p> <p><b>195 [1]</b> 3/3</p> <p><b>1995 [2]</b> 6/10 174/19</p> <p><b>1998 [2]</b> 6/12 64/22</p> <p><b>1999 [1]</b> 6/14</p> <hr/> <p><b>2</b></p> <p><b>2 August [1]</b> 135/14</p> <p><b>2 billion [2]</b> 38/7 174/21</p> <p><b>2 September [1]</b> 158/8</p> <p><b>2.00 [1]</b> 113/21</p> <p><b>2.00 pm [1]</b> 113/14</p> <p><b>2.3 [1]</b> 174/22</p> <p><b>2.5 [1]</b> 176/18</p> <p><b>2.6 [1]</b> 176/22</p> <p><b>200,000 [1]</b> 129/14</p> <p><b>2000 [1]</b> 11/6</p>	<p><b>2000s [1]</b> 175/9</p> <p><b>2002 [1]</b> 6/16</p> <p><b>2003 [1]</b> 6/18</p> <p><b>2005 [1]</b> 6/21</p> <p><b>2006 [2]</b> 6/18 134/12</p> <p><b>2007 [1]</b> 83/10</p> <p><b>2009 [1]</b> 175/12</p> <p><b>2010 [8]</b> 129/8 129/14 130/2 134/16 167/12 167/18 174/19 175/12</p> <p><b>2012 [15]</b> 4/11 6/1 9/14 10/12 10/18 14/3 98/22 100/7 134/18 134/23 174/24 175/3 176/1 176/4 176/6</p> <p><b>2013 [38]</b> 2/4 11/10 52/21 55/12 65/6 65/7 65/11 66/16 66/19 70/1 82/21 83/13 83/18 97/18 97/19 101/15 106/19 111/7 121/1 123/14 123/19 125/14 126/6 130/15 131/1 134/10 134/25 135/14 136/23 140/2 141/19 153/11 157/5 158/8 176/8 178/10 186/7 186/10</p> <p><b>2013/early [1]</b> 11/17</p> <p><b>2014 [6]</b> 2/4 11/17 19/18 29/12 33/22 180/11</p> <p><b>2015 [15]</b> 11/7 50/10 52/15 55/2 57/24 58/14 84/4 84/7 87/16 92/2 114/8 173/17 175/19 178/5 180/23</p> <p><b>2016 [10]</b> 30/5 63/5 63/10 63/21 64/7 65/5 66/16 92/1 179/22 183/10</p> <p><b>2017 [2]</b> 9/21 9/23</p> <p><b>2018 [1]</b> 11/11</p> <p><b>2019 [1]</b> 72/1</p> <p><b>2020 [3]</b> 5/3 9/14 145/24</p> <p><b>2022 [1]</b> 97/19</p> <p><b>2024 [2]</b> 1/1 1/19</p> <p><b>21 [1]</b> 2/8</p> <p><b>21 years [1]</b> 63/6</p> <p><b>22 [1]</b> 7/7</p> <p><b>22 May [1]</b> 2/4</p> <p><b>23 [1]</b> 130/14</p> <p><b>255 [1]</b> 22/15</p> <p><b>27 June [1]</b> 127/6</p> <p><b>28 [1]</b> 126/15</p> <p><b>29 [2]</b> 97/25 127/5</p> <hr/> <p><b>3</b></p> <p><b>3 July [1]</b> 111/7</p> <p><b>3 July 2013 [1]</b> 136/23</p> <p><b>3 July 2015 [1]</b> 52/15</p>	<p><b>3.07 [1]</b> 152/22</p> <p><b>3.10 [1]</b> 152/19</p> <p><b>3.25 [2]</b> 152/19 152/24</p> <p><b>30 [4]</b> 97/25 115/2 115/3 127/17</p> <p><b>30-odd [1]</b> 69/24</p> <p><b>300813 [1]</b> 65/10</p> <p><b>31 [1]</b> 98/1</p> <p><b>32 [6]</b> 97/21 97/22 97/22 98/2 98/4 100/13</p> <p><b>33 [1]</b> 143/5</p> <p><b>34 [2]</b> 115/14 160/16</p> <p><b>35 [5]</b> 138/4 138/6 143/5 143/10 143/16</p> <p><b>36 [2]</b> 2/2 120/21</p> <p><b>37 [1]</b> 150/9</p> <p><b>38 [3]</b> 150/6 150/11 185/7</p> <hr/> <p><b>4</b></p> <p><b>4 July [2]</b> 91/18 92/1</p> <p><b>4 September [2]</b> 58/14 61/3</p> <p><b>4.00 [1]</b> 30/19</p> <p><b>4.34 [1]</b> 197/25</p> <p><b>40 [1]</b> 141/14</p> <p><b>41 [1]</b> 2/8</p> <p><b>44 [2]</b> 82/17 82/19</p> <p><b>45 [2]</b> 82/17 82/19</p> <p><b>45 minutes [1]</b> 197/15</p> <p><b>46 [3]</b> 128/4 130/12 130/13</p> <hr/> <p><b>5</b></p> <p><b>5 October [1]</b> 64/2</p> <p><b>5.2 million [1]</b> 107/15</p> <p><b>50 [2]</b> 97/22 174/16</p> <p><b>500,000 [1]</b> 174/21</p> <p><b>54 [2]</b> 2/21 2/22</p> <p><b>57 [1]</b> 49/19</p> <hr/> <p><b>6</b></p> <p><b>6 million [3]</b> 38/5 38/6 174/20</p> <p><b>6.5 [1]</b> 126/22</p> <p><b>6.6 [1]</b> 126/25</p> <p><b>60,000 [1]</b> 174/20</p> <p><b>600 [1]</b> 11/11</p> <p><b>65 [1]</b> 126/2</p> <p><b>69 [2]</b> 138/3 138/6</p> <hr/> <p><b>7</b></p> <p><b>7 January [2]</b> 46/18 47/12</p> <p><b>70 billion [1]</b> 174/6</p> <p><b>700 [1]</b> 11/8</p> <p><b>76 [2]</b> 143/1 185/6</p> <hr/> <p><b>8</b></p> <p><b>8 July [3]</b> 125/14 126/6 154/22</p>
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<b>8</b>	175/6 175/11 175/14 176/12 177/13 177/17 178/19 179/6 181/24 183/7 183/12 183/15 184/13 186/3 187/23 190/13 194/21 195/3 195/5 196/6 197/10 197/16 197/19	<b>acted [6]</b> 20/5 62/15 62/15 96/13 147/8 155/21 <b>acting [3]</b> 16/5 82/6 184/3 <b>action [11]</b> 68/23 68/23 69/22 73/5 83/8 86/9 94/9 166/18 166/20 177/9 192/22 <b>actions [14]</b> 68/8 83/2 97/2 113/5 116/4 117/21 135/9 148/6 149/2 150/18 155/24 164/24 184/16 196/17 <b>activities [5]</b> 26/21 117/5 117/14 149/20 161/14 <b>activity [9]</b> 2/19 11/3 11/18 12/9 12/10 77/18 83/9 195/3 195/5 <b>actually [15]</b> 33/8 61/7 81/4 81/6 86/16 97/1 100/12 104/10 105/9 111/25 152/15 182/9 183/3 185/23 188/6	<b>adopting [1]</b> 121/22 <b>advance [4]</b> 47/1 100/4 103/21 104/16 <b>advanced [3]</b> 49/15 69/20 105/7 <b>advances [1]</b> 102/22 <b>adversarial [4]</b> 104/24 105/3 105/19 188/22 <b>adverse [7]</b> 73/3 74/10 75/22 78/15 79/7 79/23 80/6 <b>adverse/disclosable [1]</b> 74/10 <b>advice [91]</b> 3/6 8/1 8/6 8/8 8/12 8/20 8/22 8/24 9/2 9/10 11/14 12/1 12/8 13/3 13/21 23/24 74/2 74/15 77/3 77/4 77/8 77/8 77/10 78/6 78/11 78/12 87/15 113/3 114/1 116/3 116/8 116/11 120/6 121/12 121/13 122/2 122/2 122/8 125/19 125/24 125/25 126/9 126/10 135/14 135/19 136/7 138/17 141/10 141/16 141/19 141/25 142/2 142/23 143/19 145/4 145/7 145/11 145/18 145/22 146/3 148/22 149/13 149/25 152/4 158/15 159/23 159/25 160/2 160/17 163/6 165/4 166/12 167/10 172/23 177/19 178/3 178/8 178/14 178/15 178/19 178/22 178/23 179/16 183/5 186/19 187/13 187/20 187/23 188/4 195/12 197/2	169/4 <b>affecting [2]</b> 95/7 127/17 <b>afraid [8]</b> 72/19 77/6 122/11 125/22 133/4 152/12 165/12 180/4 <b>after [18]</b> 10/6 11/2 24/3 28/25 30/19 30/20 46/19 55/10 73/17 97/12 107/16 108/3 108/5 111/1 136/22 166/25 168/7 168/10 <b>afternoon [4]</b> 113/22 113/24 152/25 197/12 <b>again [32]</b> 6/19 10/17 17/25 22/4 30/19 41/21 54/15 61/4 71/23 75/11 78/7 80/21 87/3 88/5 95/23 110/20 113/9 130/24 135/4 139/11 142/5 143/12 145/20 146/24 147/15 156/22 158/1 165/11 166/7 170/20 170/21 183/22 <b>against [20]</b> 6/6 10/15 16/14 31/1 40/4 55/23 61/5 61/25 68/18 99/7 112/23 128/16 133/14 145/13 154/25 155/20 160/16 176/14 186/6 189/9 <b>agency [1]</b> 174/8 <b>agenda [1]</b> 163/20 <b>agent [5]</b> 32/14 37/5 37/6 109/25 176/17 <b>agent's [2]</b> 108/22 110/4 <b>agents [12]</b> 32/6 32/9 32/10 32/12 32/17 33/15 36/7 36/8 36/8 36/15 40/3 174/5 <b>agents/Horizon [1]</b> 36/7 <b>aggregating [1]</b> 38/4 <b>aggressive [1]</b> 154/1 <b>ago [4]</b> 55/4 82/24 84/23 182/21 <b>agree [17]</b> 25/1 33/21 40/10 43/2 62/6 66/24 67/2 79/17 86/22 87/8 87/15 121/17 150/15 150/21 170/14 181/16 195/17 <b>agreed [4]</b> 62/9 86/17 123/4 182/21 <b>agrees [1]</b> 87/14 <b>ahead [1]</b> 53/22 <b>aim [1]</b> 137/18 <b>aims [4]</b> 24/17 27/15 27/16 153/18 <b>aired [1]</b> 46/19 <b>Alan [1]</b> 72/24
<b>8 May [2]</b> 173/17 178/5 <b>8,000 [1]</b> 174/5 <b>80 [1]</b> 141/13 <b>84 [1]</b> 23/16 <b>850 [1]</b> 11/7 <b>88 [1]</b> 24/14	<b>above [6]</b> 33/7 36/10 37/3 77/6 130/23 155/12 <b>absence [2]</b> 159/21 189/7 <b>absolutely [2]</b> 144/15 175/21 <b>accept [9]</b> 6/22 7/2 18/22 69/17 84/9 85/8 85/25 138/16 148/6 <b>acceptable [3]</b> 37/16 70/12 78/21 <b>acceptance [1]</b> 41/3 <b>accepted [1]</b> 28/7 <b>accepts [1]</b> 177/3 <b>access [4]</b> 19/12 19/18 123/6 180/20 <b>accordance [2]</b> 20/6 170/13 <b>according [2]</b> 146/14 151/8 <b>accordingly [2]</b> 4/6 149/1 <b>account [12]</b> 12/11 12/17 55/21 95/4 117/4 125/16 126/17 127/1 134/18 169/10 174/7 175/23 <b>accounting [6]</b> 16/16 32/13 95/9 108/12 108/23 174/18 <b>accounts [2]</b> 100/25 174/10 <b>Accredited [1]</b> 121/2 <b>accuracy [4]</b> 7/15 30/14 111/17 112/8 <b>accurate [2]</b> 112/5 112/6 <b>accused [1]</b> 90/16 <b>achieve [1]</b> 189/19 <b>achieved [1]</b> 22/21 <b>acknowledge [2]</b> 87/16 143/25 <b>acknowledged [2]</b> 58/17 173/1 <b>acknowledgement [1]</b> 173/7 <b>acknowledging [2]</b> 84/19 87/5 <b>acquired [1]</b> 131/4 <b>across [7]</b> 32/24 38/7 52/17 76/7 137/16 138/10 154/12 <b>act [7]</b> 9/6 117/24 117/25 118/4 120/10 120/11 135/24	<b>ad [1]</b> 23/23 <b>ad hoc [1]</b> 23/23 <b>added [6]</b> 89/25 193/18 194/16 194/22 196/19 196/20 <b>adding [3]</b> 4/5 61/22 194/8 <b>addition [1]</b> 9/10 <b>Additionally [1]</b> 123/10 <b>address [10]</b> 18/17 22/16 30/8 72/11 89/19 95/3 114/21 122/10 123/1 191/14 <b>addressed [6]</b> 50/2 67/18 100/9 113/25 120/23 152/10 <b>addressing [1]</b> 101/6 <b>adhere [1]</b> 119/7 <b>adjourned [1]</b> 198/1 <b>Adjournment [1]</b> 113/20 <b>adjudicated [1]</b> 110/19 <b>administering [1]</b> 5/7 <b>administration [1]</b> 6/5 <b>administrative [1]</b> 123/9 <b>admission [1]</b> 84/25 <b>admitted [3]</b> 6/9 6/15 63/8 <b>admittedly [1]</b> 143/24 <b>adopt [3]</b> 66/12 105/19 106/3 <b>adopted [3]</b> 44/16 65/5 65/6		
<b>9</b>				
<b>9 months [1]</b> 107/17 <b>9.45 [1]</b> 1/2 <b>9.45 am [2]</b> 197/1 198/1 <b>94 [5]</b> 73/9 73/16 74/4 75/8 76/13 <b>97 [1]</b> 3/3				
<b>A</b>				
<b>ability [2]</b> 85/19 122/9 <b>able [13]</b> 16/6 88/12 95/7 104/9 110/9 110/10 131/10 131/15 142/14 157/5 180/16 180/20 184/24 <b>about [137]</b> 4/7 8/5 11/4 11/5 13/18 14/25 15/15 15/23 16/12 16/25 17/1 17/4 17/25 18/1 19/18 20/13 21/19 21/21 21/22 30/19 34/5 34/22 35/20 35/25 37/25 42/16 44/3 44/17 44/19 45/5 46/20 50/13 50/19 50/21 59/15 60/20 61/21 62/5 64/5 69/12 75/7 75/8 78/23 81/2 82/4 83/19 85/19 87/3 88/23 96/12 99/1 108/11 113/16 114/18 120/17 124/2 124/17 124/18 124/20 127/3 128/17 128/22 129/5 129/10 130/1 130/6 131/4 132/1 132/18 132/25 133/7 133/12 133/17 133/19 133/22 133/23 134/8 134/11 134/16 134/17 134/19 135/2 138/18 140/10 141/12 141/18 141/20 144/18 146/3 146/9 147/1 147/19 148/11 148/12 148/14 152/8 153/4 153/14 156/6 157/14 157/16 158/4 162/16 162/18 163/4 163/6 166/12 171/19 172/9 172/11 172/14 172/17 174/11 174/16				

<b>A</b>	46/22 51/21 53/2 53/18 55/4 59/24 60/1 60/21 87/2 90/19 93/25 98/20 158/25 190/1 194/10 197/1 198/1	50/13 52/16 53/4 53/11 57/1 60/25 64/7 64/20 64/23 65/14 65/23 68/6 68/18 68/23 68/23 70/9 74/12 79/12 79/13 83/2 83/8 90/23 91/16 92/23 93/5 93/23 95/1 98/9 100/2 103/4 105/9 105/25 111/17 112/9 115/5 115/22 116/14 116/22 117/11 119/9 119/22 120/7 120/8 128/21 131/1 132/20 133/1 134/5 134/25 135/8 137/3 144/21 144/23 145/2 145/6 145/9 146/25 148/5 148/9 148/17 149/22 151/13 151/24 152/4 152/6 152/13 156/1 157/9 164/2 164/14 164/24 165/1 165/17 173/1 173/6 182/14 184/11 187/5 188/11 188/13 190/13 191/21 192/18 193/19 195/12 196/10	159/4 159/7 164/17 <b>appellants [1]</b> 145/12 <b>applicant [1]</b> 106/25 <b>application [2]</b> 107/1 118/3 <b>applies [1]</b> 3/10 <b>apply [2]</b> 115/24 119/8 <b>applying [1]</b> 116/5 <b>appointed [1]</b> 115/4 <b>appreciate [5]</b> 27/21 42/3 107/12 110/15 117/17 <b>approach [35]</b> 28/4 34/24 35/8 47/19 48/14 50/8 60/20 66/11 66/12 69/1 69/2 69/14 69/15 74/22 75/3 75/4 75/12 79/21 104/12 105/6 105/19 105/20 106/3 109/2 113/10 116/5 118/9 121/22 147/3 176/17 183/4 184/14 184/25 192/12 192/17 <b>approached [1]</b> 27/4 <b>approaches [1]</b> 62/4 <b>approaching [1]</b> 62/2 <b>appropriate [15]</b> 59/20 80/4 88/14 92/13 104/23 110/24 122/8 141/23 152/14 155/19 165/6 165/7 167/10 183/15 190/4 <b>appropriately [6]</b> 20/6 88/25 89/7 89/8 89/13 96/13 <b>approval [1]</b> 193/8 <b>approximate [1]</b> 69/14 <b>April [3]</b> 1/1 11/10 183/10 <b>April 2024 [1]</b> 1/1 <b>Arbuthnot [2]</b> 174/24 176/2 <b>architects [1]</b> 146/4 <b>are [119]</b> 1/23 3/18 3/20 3/22 3/24 4/15 4/20 11/10 12/25 18/2 27/5 30/24 31/5 31/14 31/22 35/14 35/14 36/15 36/24 37/10 37/13 39/13 39/19 40/14 40/20 41/13 41/13 43/16 44/13 45/3 45/5 50/25 52/22 59/8 65/25 66/9 67/14 68/8 69/20 72/11 73/1 73/8 73/12 73/18 73/25 75/6 75/7 76/14 76/21 77/7 77/9 81/10 81/17 81/22 82/4 85/9 89/10 92/3 92/5 94/17 95/6 98/17 98/19 99/6	102/2 104/17 105/20 109/18 111/9 113/1 113/7 116/7 116/24 118/1 123/9 124/13 131/11 133/16 137/8 137/12 137/14 137/18 139/10 142/5 150/8 150/12 154/1 154/2 155/1 155/3 155/12 155/13 158/24 161/6 161/7 164/3 164/3 166/25 169/7 169/8 171/15 171/25 180/15 180/20 181/7 181/15 183/23 184/15 184/23 185/1 185/25 188/5 189/13 192/12 192/14 193/18 194/3 196/25 197/10 <b>area [1]</b> 155/17 <b>areas [2]</b> 7/16 155/2 <b>aren't [6]</b> 36/8 37/8 40/4 62/8 71/7 166/9 <b>arena [1]</b> 94/12 <b>argument [1]</b> 68/17 <b>arise [1]</b> 80/1 <b>arising [3]</b> 87/18 135/9 145/14 <b>arose [2]</b> 139/13 175/24 <b>around [23]</b> 50/25 67/24 67/25 73/23 75/5 81/25 90/1 93/25 98/6 113/2 115/9 116/21 117/19 124/5 130/18 131/1 135/8 141/2 178/6 183/8 183/10 190/20 193/8 <b>ARQ [1]</b> 186/14 <b>arrange [2]</b> 23/25 104/3 <b>arrived [1]</b> 136/8 <b>arrow [1]</b> 160/1 <b>art [2]</b> 51/7 51/10 <b>article [2]</b> 175/14 175/17 <b>articulate [1]</b> 107/2 <b>articulated [1]</b> 28/8 <b>articulating [1]</b> 105/1 <b>artifice [2]</b> 47/24 135/8 <b>as [222]</b> <b>ascertain [4]</b> 131/20 132/6 133/5 151/5 <b>ascertainable [1]</b> 170/7 <b>ask [22]</b> 1/10 4/6 12/1 53/19 73/19 74/3 75/10 86/13 86/22 92/7 93/11 97/24 128/5 137/5 137/25 151/13 156/6 157/15 158/1 193/7 196/25 197/7
----------	--	---	---	---

<b>A</b>	<b>attempting [1]</b> 156/2	149/21 152/13 165/17	<b>bat [11]</b> 19/6 87/13	77/22 77/25 78/21
<b>asked [48]</b> 7/9 22/12	<b>attend [3]</b> 13/11	175/17 175/19	88/19 88/21 88/23	79/14 80/23 81/11
26/13 30/8 32/6 45/12	140/8 140/25	<b>awareness [1]</b> 98/5	89/1 89/3 89/3 89/6	81/15 81/18 82/21
53/21 53/25 54/4	<b>attended [3]</b> 60/18	<b>away [4]</b> 33/6 80/20	89/11 89/13	83/1 83/10 83/20
69/23 69/23 73/25	103/7 135/17	90/17 149/15	<b>batsman [1]</b> 89/3	84/10 87/23 88/2 88/7
74/20 75/14 76/21	<b>attendees [1]</b> 173/19	<b>axe [4]</b> 51/2 51/5	<b>BBC [23]</b> 29/25 46/25	100/22 100/24 101/23
82/21 82/25 91/15	<b>attending [2]</b> 60/22	51/6 51/10	47/14 48/6 48/15	102/8 105/3 105/18
103/19 104/1 104/2	104/10	<b>B</b>	49/10 50/24 51/3	106/7 106/8 108/12
105/11 112/16 112/20	<b>attention [6]</b> 66/6		51/19 51/21 51/23	108/24 109/9 110/7
114/2 114/13 114/17	77/13 130/22 137/19	<b>B176 [2]</b> 173/12	58/19 58/22 59/3	110/8 110/19 115/4
120/22 121/5 128/18	147/6 168/23	173/14	60/15 60/20 61/5	119/17 121/15 122/20
128/19 130/14 132/17	<b>attitude [9]</b> 14/16	<b>B182 [2]</b> 179/19	61/16 61/17 62/2 62/7	124/11 124/19 127/3
157/15 162/5 163/4	17/2 18/10 24/16 27/2	179/20	62/11 62/14	127/16 127/19 127/24
163/15 163/19 164/9	44/1 44/16 44/20	<b>B202 [2]</b> 45/25 46/7	<b>BBC's [4]</b> 46/17	128/16 128/21 129/4
174/24 179/7 182/11	54/18	<b>B260 [1]</b> 63/16	47/19 58/14 60/17	129/5 129/10 129/13
183/12 184/22 184/23	<b>attitudes [1]</b> 16/13	<b>B57 [1]</b> 136/16	<b>be [240]</b>	130/1 130/4 130/9
191/25 193/14 194/4	<b>attract [2]</b> 66/10	<b>B64 [1]</b> 185/10	<b>be a [1]</b> 196/13	130/14 130/17 131/15
<b>asking [26]</b> 16/25	187/4	<b>B65 [2]</b> 125/25 143/2	<b>Beachcroft [2]</b> 83/5	132/14 132/17 132/20
17/1 17/1 19/1 26/16	<b>attributing [3]</b> 174/23	<b>B79 [1]</b> 135/11	128/20	133/2 133/15 134/14
38/10 38/16 39/17	175/4 176/1	<b>B84 [1]</b> 192/2	<b>beam [1]</b> 189/4	138/20 138/24 139/6
39/21 39/21 40/12	<b>attribution [1]</b> 175/2	<b>back [47]</b> 6/21 14/13	<b>bear [1]</b> 165/2	139/17 139/23 141/22
40/17 45/7 45/12 54/7	<b>audiences [1]</b> 7/11	15/4 15/11 18/17 23/4	<b>became [10]</b> 9/18	142/12 142/14 143/15
54/12 62/9 128/24	<b>audit [11]</b> 2/22 2/23	31/4 31/7 35/1 35/16	9/23 9/25 10/6 10/21	145/4 146/15 148/4
147/16 165/6 172/5	72/14 74/8 74/10	35/18 44/8 45/19 46/6	11/2 51/8 106/6 111/1	149/10 150/19 151/15
179/6 187/10 187/13	74/12 78/23 78/25	50/6 53/5 56/15 65/10	148/5	153/4 156/9 156/18
187/17 188/7	79/10 174/10 174/12	76/10 80/20 84/1	<b>because [68]</b> 16/21	156/21 157/10 157/19
<b>asks [1]</b> 74/23	<b>August [16]</b> 4/11	88/21 89/4 89/11	17/21 19/21 22/24	158/1 158/14 158/25
<b>aspect [2]</b> 4/7 185/5	4/12 5/3 6/1 9/14 9/14	91/10 91/20 91/21	26/19 27/10 31/5 32/6	160/4 161/13 162/14
<b>assessing [2]</b> 73/8	10/12 10/18 14/3	96/1 96/10 107/8	32/21 34/17 35/12	163/14 165/3 165/5
76/14	57/24 65/6 97/19	110/14 113/24 126/10	36/12 36/23 37/14	165/25 166/5 166/7
<b>assist [3]</b> 23/10	135/14 153/11 157/5	129/8 129/14 130/2	41/13 50/20 57/24	166/23 168/20 168/20
26/22 189/8	179/22	134/12 135/20 141/10	61/21 67/13 68/16	170/16 170/20 170/24
<b>assistance [1]</b> 5/9	<b>August 2013 [1]</b>	142/23 149/25 151/20	69/7 69/11 71/1 74/19	171/7 171/21 173/2
<b>Assistant [1]</b> 91/8	157/5	151/22 163/17 166/24	76/3 77/5 79/6 79/23	175/8 175/11 175/19
<b>Assistants [1]</b> 86/6	<b>author [1]</b> 59/5	179/25 184/23	82/9 83/14 92/5 92/6	177/24 178/3 178/5
<b>assisted [2]</b> 5/22	<b>authorities [2]</b>	<b>background [8]</b> 4/10	96/20 99/21 104/2	178/6 178/20 180/16
5/24	118/21 120/2	13/14 98/2 98/4 106/9	104/3 104/22 107/23	180/24 181/6 181/11
<b>associate [1]</b> 79/15	<b>authority [2]</b> 11/1	154/18 174/1 187/2	112/7 112/19 113/2	182/1 182/8 183/4
<b>associated [3]</b> 74/13	11/4	<b>backs [3]</b> 39/17	117/18 118/20 119/12	183/13 183/14 183/19
79/1 195/12	<b>authorship [1]</b> 158/9	40/13 40/18	120/16 121/18 121/20	184/7 184/25 187/19
<b>assume [2]</b> 92/1	<b>autumn [1]</b> 64/7	<b>badge [1]</b> 43/20	131/6 139/13 143/23	188/3 190/14 190/14
193/4	<b>available [4]</b> 121/24	<b>bailiwick [1]</b> 118/20	146/18 151/3 152/8	190/22 190/24 191/25
<b>assumed [3]</b> 28/15	122/1 139/9 139/20	<b>Baker [4]</b> 83/1	154/14 161/13 164/3	192/13 193/6 196/8
142/7 142/8	<b>Avenue [1]</b> 91/9	103/18 121/1 153/10	165/18 170/19 171/13	<b>BEER [7]</b> 1/8 1/10
<b>assurance [1]</b> 2/24	<b>avenues [1]</b> 177/9	<b>balanced [1]</b> 24/24	183/8 185/19 186/13	29/1 41/18 80/18
<b>astounded [1]</b> 53/18	<b>avoid [4]</b> 66/7 88/19	<b>balances [2]</b> 56/12	186/18 188/3 188/21	197/3 199/4
<b>at [248]</b>	138/10 140/24	174/9	195/2 197/11 197/13	<b>Beezer [1]</b> 72/24
<b>at page 2 [1]</b> 41/20	<b>await [1]</b> 85/14	<b>ball [1]</b> 89/4	<b>become [5]</b> 10/13	<b>before [39]</b> 3/7 3/16
<b>at page 3 [1]</b> 29/4	<b>aware [53]</b> 10/13	<b>banter [2]</b> 44/13	10/22 69/5 131/21	9/12 9/23 9/25 14/12
<b>at page 4 [1]</b> 49/17	10/21 10/22 10/25	96/16	132/6	18/16 23/9 27/8 60/13
<b>attach [5]</b> 66/19	11/2 11/6 11/9 11/10	<b>bants [1]</b> 44/14	<b>becomes [1]</b> 64/4	69/21 71/25 78/24
102/15 106/20 180/13	11/12 11/17 12/23	<b>bar [3]</b> 39/12 57/4	<b>becoming [1]</b> 66/13	78/24 80/13 80/18
196/9	26/1 26/19 51/8 73/4	57/11	<b>been [173]</b> 2/12 2/13	84/19 93/15 97/10
<b>attached [5]</b> 65/7	84/25 87/17 97/12	<b>barrister [2]</b> 6/9	2/17 7/9 9/4 10/8	97/17 110/20 111/8
65/11 94/18 107/5	105/14 105/15 106/6	192/11	10/14 13/9 13/11 15/1	115/4 116/2 116/3
153/13	108/11 109/10 112/13	<b>Barty [2]</b> 61/12	20/3 22/9 24/2 26/9	122/8 128/14 128/24
<b>attaches [1]</b> 188/21	118/15 119/1 124/14	111/10	28/4 28/9 39/1 39/3	129/3 129/13 129/24
<b>attachment [1]</b> 65/10	124/15 125/6 127/17	<b>base [2]</b> 32/4 37/17	41/7 46/19 50/10	134/19 157/13 157/15
<b>attachments [1]</b>	128/1 129/23 130/11	<b>based [3]</b> 22/20 36/2	51/17 53/11 55/7	164/9 183/4 190/2
154/11	131/21 132/6 132/15	94/15	55/10 56/18 58/5 63/5	191/4 197/13
<b>attempt [8]</b> 21/2 21/6	133/8 136/14 137/8	<b>basic [1]</b> 94/18	63/8 65/20 69/25 71/1	<b>beg [12]</b> 52/12 64/4
21/17 30/11 97/6	137/20 144/24 145/3	<b>basis [7]</b> 2/10 30/10	71/8 71/8 72/20 73/4	97/23 98/20 143/3
97/10 102/3 102/4	148/4 148/5 148/7	34/5 52/24 53/1	73/16 74/13 75/9 76/4	146/22 163/17 164/20
	148/9 148/17 149/10	132/22 187/14	76/6 76/14 77/16	173/9 173/15 191/12

<b>B</b>	14/24 18/12 44/1 44/11 44/14 58/14 103/13 119/3 127/8 143/3 153/5 185/11 <b>beyond [5]</b> 61/24 150/8 150/12 152/12 172/16 <b>biased [1]</b> 101/2 <b>big [7]</b> 69/4 107/14 119/8 120/8 120/10 120/12 120/13 <b>billion [4]</b> 38/7 144/7 174/6 174/21 <b>bit [22]</b> 17/14 20/1 27/9 45/14 54/21 54/25 62/23 71/25 89/19 92/22 95/22 107/23 112/7 113/3 117/17 123/17 133/17 158/18 159/8 159/22 161/12 182/11 <b>bits [2]</b> 91/25 116/7 <b>BlackBerry [1]</b> 123/13 <b>blame [1]</b> 99/8 <b>blog [3]</b> 61/18 61/24 95/17 <b>blow [1]</b> 159/23 <b>bluffer [2]</b> 87/10 87/25 <b>bluffing [1]</b> 88/1 <b>board [7]</b> 72/10 171/23 171/24 172/7 193/4 193/6 195/11 <b>Board's [1]</b> 72/25 <b>boasted [1]</b> 61/21 <b>bodies [1]</b> 118/22 <b>body [9]</b> 117/2 117/3 117/14 117/25 118/7 119/6 119/17 173/1 184/19 <b>Bogerd [6]</b> 86/7 86/10 88/8 93/18 94/7 94/22 <b>bold [1]</b> 56/13 <b>Bond [14]</b> 63/19 63/22 64/8 68/25 70/17 72/23 72/25 73/8 83/5 103/14 115/17 128/20 137/6 147/2 <b>both [11]</b> 9/7 55/13 56/10 65/4 66/16 73/1 104/17 118/1 129/25 133/25 178/2 <b>bottom [8]</b> 39/7 39/8 46/1 50/16 72/7 100/23 169/2 181/21 <b>bound [1]</b> 7/3 <b>Bourke [3]</b> 42/6 42/16 44/2 <b>bow' [1]</b> 153/18 <b>bows [1]</b> 154/12 <b>box [1]</b> 161/23	<b>boxes [1]</b> 58/12 <b>Boy [1]</b> 107/14 <b>BPs [2]</b> 159/4 159/7 <b>brackets [3]</b> 89/17 194/7 194/15 <b>branch [23]</b> 18/9 31/23 37/5 84/14 86/1 88/9 93/6 93/9 93/14 95/1 95/7 100/24 101/23 108/12 108/25 174/4 174/10 174/18 174/23 175/2 175/5 177/1 185/19 <b>branches [6]</b> 32/24 38/8 56/23 90/23 127/18 174/5 <b>brand [2]</b> 9/19 26/24 <b>bravado [1]</b> 44/1 <b>breach [3]</b> 61/20 171/1 171/19 <b>breached [4]</b> 151/8 156/13 163/8 169/14 <b>breadth [2]</b> 118/13 119/13 <b>break [11]</b> 16/1 59/20 59/21 59/25 60/14 113/13 152/19 152/23 157/15 164/9 191/4 <b>breathtakingly [1]</b> 42/18 <b>Brian [6]</b> 65/1 158/17 176/16 177/19 178/3 192/11 <b>Brian Altman [6]</b> 65/1 158/17 176/16 177/19 178/3 192/11 <b>Brian's [3]</b> 178/15 178/22 196/20 <b>briefing [4]</b> 103/1 191/13 196/7 196/9 <b>bring [6]</b> 12/11 66/6 112/23 147/6 153/16 177/7 <b>bringing [1]</b> 168/23 <b>brings [1]</b> 155/21 <b>broad [2]</b> 8/25 19/23 <b>broadcast [2]</b> 29/20 49/14 <b>broadcasts [1]</b> 23/25 <b>broader [1]</b> 152/6 <b>broke [1]</b> 46/5 <b>brought [9]</b> 10/15 11/7 12/16 65/12 77/12 117/4 130/20 133/14 137/19 <b>bug [16]</b> 82/23 84/12 125/16 125/16 125/17 126/24 127/1 129/6 130/2 130/6 130/16 130/21 134/12 134/16 134/18 182/6 <b>bug' [3]</b> 82/22 130/19 130/20 <b>bugs [42]</b> 12/14	56/11 83/1 83/9 83/20 87/18 125/15 126/4 127/17 127/21 127/24 128/1 128/7 128/21 130/23 131/4 131/12 131/21 132/7 132/14 132/18 132/25 133/7 133/12 133/19 133/24 136/2 136/13 147/9 147/11 147/20 158/5 160/24 161/24 162/12 162/15 162/16 164/1 168/7 168/10 168/11 171/18 <b>build [1]</b> 61/13 <b>building [1]</b> 49/13 <b>bullet [15]</b> 74/6 76/12 76/13 76/18 77/2 77/7 78/2 78/22 99/2 99/4 121/3 159/9 163/24 167/14 167/23 <b>bundle [9]</b> 29/7 41/8 41/9 46/4 46/5 49/20 81/5 91/24 154/5 <b>bundles [2]</b> 41/15 46/2 <b>bunker [3]</b> 62/18 62/23 62/25 <b>business [21]</b> 7/10 7/11 11/22 17/7 17/19 31/24 32/6 37/11 37/13 40/22 75/18 76/7 121/9 121/10 131/16 137/4 137/17 138/10 149/18 149/21 193/5 <b>but [169]</b> 2/10 3/20 4/7 5/12 8/10 9/4 9/11 12/5 12/9 14/8 15/25 16/16 17/13 18/14 20/2 20/16 21/23 23/2 27/13 28/6 31/5 32/23 33/7 33/22 34/18 39/14 42/2 42/11 44/10 45/10 47/14 47/18 50/12 50/19 50/21 51/22 52/23 54/16 54/20 56/9 57/4 58/4 60/25 62/21 64/5 67/5 67/7 67/18 68/5 69/10 69/14 69/22 69/23 70/8 70/17 71/5 71/5 71/7 72/20 73/4 76/3 76/7 76/8 77/4 77/24 78/8 80/14 80/19 80/23 81/3 81/19 86/23 87/12 88/4 88/11 93/18 95/2 95/22 96/2 97/14 99/10 103/25 104/5 104/10 104/23 105/1 105/3 107/10 107/14 108/1 109/4 109/21 110/3 110/18 110/23	112/2 112/18 113/7 116/11 116/15 116/20 117/9 118/14 118/18 118/19 119/10 124/2 124/6 124/18 125/6 128/17 128/23 129/21 131/9 131/13 132/2 133/20 135/5 137/20 139/11 139/23 142/20 143/7 143/25 144/16 148/6 148/20 152/2 158/9 159/10 160/12 160/14 161/13 162/2 162/20 163/11 163/15 164/1 165/20 166/9 166/16 166/21 167/16 167/18 170/20 175/18 176/1 176/9 177/4 178/17 179/2 179/5 179/9 179/11 180/18 182/9 182/10 183/25 184/7 184/22 185/24 187/7 187/17 188/10 189/10 191/2 193/11 194/1 197/18 <b>Button [1]</b> 87/1
			<b>C</b>	
			<b>calculating [1]</b> 49/9 <b>call [10]</b> 1/5 34/3 40/24 45/21 66/15 136/20 137/1 137/3 137/14 186/20 <b>called [8]</b> 10/5 11/23 82/23 103/18 117/3 117/13 125/17 144/24 <b>Callendar [6]</b> 125/17 127/4 129/5 134/12 134/13 181/6 <b>calling [1]</b> 68/21 <b>calls [4]</b> 45/2 137/7 138/8 138/12 <b>came [14]</b> 6/21 52/17 52/21 97/12 104/9 112/2 112/3 117/1 130/22 131/11 131/22 172/23 182/8 187/18 <b>camera [1]</b> 59/10 <b>Cameron [3]</b> 24/2 111/10 111/20 <b>Cameron McKenna [2]</b> 24/2 111/10 <b>campaigning [1]</b> 61/25 <b>can [218]</b> <b>can't [27]</b> 10/3 17/10 25/4 26/19 26/25 33/19 44/9 52/23 54/2 57/6 58/4 62/23 70/23 71/10 78/7 89/23 91/12 103/24 107/12 110/16 110/17 110/22 133/3 133/24 139/22 151/10 185/24	

<b>C</b>	76/15	113/16 129/20	74/19 75/14 75/21 76/20 82/7 85/9 145/12	<b>colour [1]</b> 68/7
<b>candour [1]</b> 15/21	<b>Categories [1]</b> 177/11	<b>changed [1]</b> 9/16	<b>channel [1]</b> 84/24	<b>combination [1]</b> 55/20
<b>cannot [5]</b> 94/12 95/2 110/11 121/20 166/16	<b>category [1]</b> 44/13	<b>charge [3]</b> 29/12 167/1 177/7	<b>claimants' [7]</b> 74/1 74/19 76/8 76/22 78/14 79/8 81/12	<b>come [29]</b> 3/25 9/3 9/22 14/13 24/7 25/19 36/23 40/21 40/23 42/8 63/4 78/9 80/17 82/14 93/8 93/14 96/9 120/3 134/20 137/10 138/16 141/6 146/2 163/17 168/13 170/23 173/5 185/7 190/2
<b>capable [2]</b> 57/11 90/22	<b>cause [5]</b> 73/12 76/15 83/19 84/12 113/8	<b>charged [1]</b> 136/4	<b>charges [1]</b> 85/16	<b>comes [2]</b> 25/23 69/5
<b>capacity [2]</b> 141/5 141/7	<b>caused [13]</b> 21/9 21/10 21/11 21/12 21/13 21/14 22/1 22/2 22/5 129/11 139/2 157/6 177/2	<b>Charles [2]</b> 50/4 50/14	<b>Charles' [11]</b> 126/15 127/2 127/22 136/23 138/17 149/13 150/9 151/8 166/11 178/8 178/19	<b>comfort [1]</b> 90/1
<b>capturing [1]</b> 33/18	<b>caveat [1]</b> 82/1	<b>check [7]</b> 8/22 63/23 146/17 162/2 178/4 178/24 179/2	<b>Clarke's [17]</b> 125/19 125/22 126/9 135/14 141/10 142/23 143/15 145/4 145/7 145/22 146/3 148/22 150/1 150/12 158/15 163/6 165/4	<b>comfortable [1]</b> 116/5
<b>care [2]</b> 51/20 91/17	<b>cc'd [1]</b> 73/1	<b>check' [1]</b> 7/17	<b>Clashed [1]</b> 160/25	<b>coming [7]</b> 1/13 28/13 85/2 86/19 133/18 134/22 167/11
<b>carefully [5]</b> 21/19 21/21 21/22 68/6 155/9	<b>CCRC [18]</b> 50/21 90/17 172/22 173/17 176/25 178/5 178/14 178/16 178/19 179/16 179/24 181/25 182/3 182/22 183/4 184/4 184/12 192/19	<b>checked [1]</b> 176/15	<b>classes [1]</b> 69/24	<b>commence [1]</b> 124/17
<b>carried [4]</b> 11/18 89/14 99/9 125/12	<b>ceased [2]</b> 11/18 80/1	<b>checking [1]</b> 52/17	<b>clause [1]</b> 174/14	<b>commences [1]</b> 155/19
<b>carry [2]</b> 40/2 159/11	<b>cent [1]</b> 93/18	<b>cherished [3]</b> 17/12 17/14 17/16	<b>clause 12 [1]</b> 174/14	<b>comment [14]</b> 14/22 25/4 35/2 82/21 91/6 91/19 104/23 120/22 130/14 139/22 141/15 142/10 151/10 157/13
<b>carrying [3]</b> 12/20 160/9 165/21	<b>central [3]</b> 17/6 135/24 138/18	<b>cherry-pick [1]</b> 100/18	<b>clear [19]</b> 13/5 13/20 26/2 28/8 28/14 33/8 53/1 61/16 64/18 69/5 83/9 84/11 93/23 95/23 96/7 105/2 115/11 131/24 154/12	<b>commenting [1]</b> 33/7
<b>Cartwright [11]</b> 127/6 137/7 137/11 141/20 151/18 158/16 161/10 178/11 178/14 190/15 196/9	<b>centre [1]</b> 149/7	<b>Chief [6]</b> 93/8 93/11 191/9 191/10 191/20 193/3	<b>clearly [13]</b> 17/6 55/19 67/17 67/18 75/16 77/12 78/13 88/11 90/15 93/4 94/23 95/2 112/18	<b>comments [3]</b> 36/4 110/18 137/5
<b>case [45]</b> 12/2 12/6 18/7 50/5 53/1 53/1 53/12 79/7 83/11 87/19 87/20 96/7 100/5 101/7 102/23 103/14 105/7 106/23 107/6 107/9 108/10 108/11 108/25 110/15 128/16 128/23 129/1 129/4 135/3 153/24 156/19 156/24 157/3 167/19 170/22 175/6 175/11 180/16 182/9 186/6 188/1 188/6 189/8 189/19 190/4	<b>CEO [3]</b> 192/7 193/2 193/11	<b>childish [1]</b> 38/24	<b>client [4]</b> 3/5 3/11 17/7 119/4	<b>commercially [4]</b> 122/17 122/21 123/10 125/9
<b>cases [33]</b> 52/23 60/21 83/10 83/15 83/19 83/20 85/5 97/5 99/11 99/21 99/25 100/3 100/18 100/18 100/25 101/1 103/4 106/7 107/22 108/1 108/6 128/21 159/17 176/7 176/13 177/22 177/25 178/1 178/1 192/8 192/13 192/21 196/11	<b>Ceri [4]</b> 50/6 50/9 50/18 60/16	<b>choice [1]</b> 148/8	<b>client/the [1]</b> 17/7	<b>commissioned [2]</b> 127/12 154/19
<b>cash [3]</b> 174/6 174/8 174/11	<b>certain [2]</b> 26/20 42/12	<b>choose [3]</b> 32/10 32/18 119/9	<b>clients [6]</b> 13/18 25/24 53/19 54/8 54/13 120/7	<b>commit [1]</b> 90/15
<b>cast [4]</b> 15/11 97/25 140/11 140/11	<b>certainly [47]</b> 13/8 13/12 14/23 17/10 20/8 20/24 23/1 28/22 40/8 42/10 62/22 63/13 67/8 68/15 68/20 88/7 91/3 92/3 96/14 104/18 105/11 105/15 108/2 109/4 109/10 109/12 109/17 109/21 112/3 117/22 119/23 122/6 124/2 124/7 131/14 131/19 134/2 138/25 139/24 140/9 150/24 152/9 162/9 163/15 179/9 182/16 191/3	<b>chosen [1]</b> 99/25	<b>close [4]</b> 14/22 47/19 48/15 70/10	<b>commitments [1]</b> 60/25
<b>Castleton [8]</b> 83/11 83/21 87/20 106/21 107/8 108/19 110/14 175/6	<b>Certificate [1]</b> 189/18	<b>chronological [1]</b> 4/4	<b>closed [1]</b> 79/12	<b>commodity [2]</b> 17/12 17/13
<b>Castleton's [2]</b> 108/7 108/11	<b>cetera [2]</b> 26/24 40/25	<b>chronologically [1]</b> 58/10	<b>closely [1]</b> 30/7	<b>common [5]</b> 54/6 54/11 160/1 160/3 174/7
<b>cataloguer [1]</b> 7/22	<b>chain [3]</b> 42/2 185/10 186/5	<b>chronology [2]</b> 58/15 136/21	<b>closer [1]</b> 95/22	<b>commonly [1]</b> 53/24
<b>catalyst [1]</b> 124/19	<b>chairman [6]</b> 15/16 16/12 111/17 111/24 112/2 112/3	<b>churn [4]</b> 36/7 36/11 36/14 41/1	<b>closure [1]</b> 23/5	<b>Comms [2]</b> 23/21 49/23
<b>catastrophic [1]</b>	<b>challenge [4]</b> 69/6 69/9 93/1 101/2	<b>circulate [1]</b> 87/8	<b>clutching [1]</b> 42/19	<b>communicated [2]</b> 79/22 148/5
	<b>challenges [2]</b> 113/4 183/23	<b>circulated [1]</b> 35/14	<b>code [3]</b> 7/3 15/18 16/5	<b>communication [2]</b> 17/4 122/1
	<b>chance [2]</b> 71/3 84/9	<b>circumstance [3]</b> 77/15 78/20 78/20	<b>collate [3]</b> 128/8 130/24 136/1	<b>communications [10]</b> 3/10 23/19 25/10 25/20 29/13 42/10 91/5 114/1 121/18 121/23
	<b>change [4]</b> 3/9 32/5	<b>circumstances [6]</b> 55/20 92/12 139/3 139/14 151/6 189/10	<b>collated [2]</b> 139/8 139/20	<b>community [3]</b> 17/24 18/3 118/12
		<b>cite [1]</b> 176/8	<b>collateral [1]</b> 187/8	<b>companies [1]</b> 120/4
		<b>cited [1]</b> 95/17	<b>colleague [2]</b> 10/5 42/7	<b>company [12]</b> 5/22 5/24 9/2 17/6 100/8
		<b>citizens [1]</b> 85/10	<b>colleagues [10]</b> 13/13 13/16 13/16 29/17 30/21 31/10 35/3 35/5 37/8 44/11	
		<b>City [1]</b> 120/9	<b>collected [1]</b> 193/4	
		<b>civil [22]</b> 6/12 6/14 6/19 6/23 13/12 22/20 55/22 63/11 63/14 80/8 81/3 83/8 83/11 133/14 137/8 145/12 149/2 149/6 149/9 155/21 171/9 189/9	<b>collection [1]</b> 78/9	
		<b>CK [2]</b> 167/25 170/1		
		<b>claim [12]</b> 112/23 115/21 116/21 121/14 121/17 121/20 121/24 122/1 154/10 154/13 154/17 182/12		
		<b>claim' [1]</b> 153/21		
		<b>claimant [2]</b> 69/10 81/18		
		<b>claimants [11]</b> 72/4 72/16 73/24 74/3		



<b>C</b>	185/19	<b>consensus [1]</b> 141/24	<b>context [26]</b> 9/8 32/4 50/7 60/11 71/25 73/6 81/2 83/12 94/17 97/24 97/25 118/5 130/22 136/15 143/25 152/11 166/16 167/17 168/21 170/19 171/9 186/6 190/22 191/20 191/25 192/25	90/7
<b>company... [7]</b> 116/8 116/23 117/12 120/14 134/14 135/5 166/9	<b>concerning [6]</b> 8/20 67/21 68/16 82/22 145/22 166/13	<b>consequence [4]</b> 120/18 132/3 159/14 176/16	<b>continuation [1]</b> 169/18	<b>core [3]</b> 41/8 197/5 197/12
<b>comparable [1]</b> 99/20	<b>concerns [18]</b> 7/12 7/16 15/23 18/2 25/8 55/10 65/15 89/20 91/23 98/9 100/5 100/9 107/2 141/20 141/22 144/18 146/9 147/1	<b>consequences [2]</b> 76/16 85/25	<b>continue [3]</b> 60/2 111/2 184/16	<b>Corfield [5]</b> 43/9 49/23 52/15 56/1 56/14
<b>compared [1]</b> 31/6	<b>concert [1]</b> 184/3	<b>consider [12]</b> 71/2 90/19 90/24 91/16 95/19 104/23 138/13 149/1 155/9 177/22 186/22 187/14	<b>continues [2]</b> 127/5 176/23	<b>corner [2]</b> 76/7 116/21
<b>compassion [1]</b> 85/8	<b>conclude [1]</b> 22/14	<b>considerable [3]</b> 6/23 43/17 118/16	<b>contract [5]</b> 11/24 42/23 153/22 174/7 174/14	<b>corporate [2]</b> 17/4 113/5
<b>compensation [2]</b> 5/6 5/18	<b>concluded [5]</b> 79/2 79/15 80/10 80/13 83/15	<b>consideration [16]</b> 75/13 75/16 75/17 75/19 105/4 116/14 116/22 117/1 117/11 117/22 117/23 118/7 146/5 164/13 164/15 164/17	<b>contractual [1]</b> 174/13	<b>corporately [1]</b> 12/16
<b>competence [2]</b> 15/23 16/8	<b>conclusion [7]</b> 15/15 43/11 57/19 86/3 100/20 147/7 192/16	<b>considerations [2]</b> 119/19 119/23	<b>contracts [2]</b> 132/20 133/15	<b>corporation [2]</b> 119/8 120/9
<b>competent [2]</b> 16/3 16/11	<b>conclusions [4]</b> 127/23 150/1 166/13 182/20	<b>considered [15]</b> 32/4 69/19 100/19 107/12 118/17 135/22 136/7 145/16 149/8 149/17 151/5 163/5 176/13 183/24 193/24	<b>contribute [4]</b> 9/4 9/10 37/22 140/8	<b>corps [1]</b> 17/20
<b>competition [1]</b> 44/1	<b>conduct [11]</b> 7/4 16/6 18/19 20/13 65/9 72/2 79/10 174/15 179/13 179/14 179/16	<b>constant [4]</b> 36/16 92/6 121/11 183/5	<b>contributed [2]</b> 45/20 64/16	<b>correct [36]</b> 2/5 2/7 3/20 3/21 5/1 5/13 6/11 13/11 16/23 19/17 29/2 31/3 35/7 49/25 63/10 63/24 68/12 80/24 81/8 81/21 83/22 87/21 111/12 119/21 125/3 125/7 126/5 147/18 150/3 150/13 159/20 160/11 160/14 162/19 175/10 175/13
<b>complainants [2]</b> 48/21 125/5	<b>conducted [9]</b> 73/15 122/20 123/14 123/19 124/21 125/4 125/8 145/2 154/20	<b>constant [1]</b> 55/16	<b>contribution [2]</b> 50/14 51/15	<b>correct* [1]</b> 160/11
<b>complained [1]</b> 66/3	<b>conducting [1]</b> 168/24	<b>constantly [2]</b> 30/10 31/18	<b>contributions [2]</b> 41/4 51/19	<b>corrected [2]</b> 63/25 80/7
<b>complaining [1]</b> 34/5	<b>conduit [1]</b> 103/13	<b>construct [1]</b> 119/16	<b>contributor [2]</b> 51/8 59/12	<b>corrections [3]</b> 1/23 3/18 3/22
<b>complaint [8]</b> 56/3 58/10 58/25 61/4 61/5 87/6 107/4 174/1	<b>conference [5]</b> 135/18 135/21 135/22 136/22 137/14	<b>contact [7]</b> 11/24 17/24 17/25 23/21 36/23 90/17 120/3	<b>control [1]</b> 123/3	<b>correctly [1]</b> 169/10
<b>complaints [22]</b> 18/2 22/20 34/6 34/20 37/25 38/9 44/19 45/4 49/15 56/20 60/17 61/14 96/12 97/17 98/8 100/15 108/11 110/6 110/7 136/2 176/19 176/23	<b>conferences [1]</b> 130/5	<b>contacted [1]</b> 128/20	<b>convenient [3]</b> 48/19 48/20 152/18	<b>correspondence [9]</b> 14/14 90/11 91/25 92/9 92/14 92/23 114/19 114/23 147/3
<b>completing [22]</b> 18/2 22/20 34/6 34/20 37/25 38/9 44/19 45/4 49/15 56/20 60/17 61/14 96/12 97/17 98/8 100/15 108/11 110/6 110/7 136/2 176/19 176/23	<b>confidence [3]</b> 90/2 109/5 153/20	<b>contacts [1]</b> 84/24	<b>conversation [3]</b> 55/4 161/8 171/12	<b>correspondent [2]</b> 88/3 88/24
<b>complete [1]</b> 114/22	<b>confident [1]</b> 93/19	<b>contains [1]</b> 121/3	<b>conversations [2]</b> 127/8 158/16	<b>corroborated [1]</b> 57/6
<b>completed [1]</b> 192/12	<b>confirm [5]</b> 64/25 65/18 102/13 169/22 186/21	<b>contained [3]</b> 121/12 145/7 145/11	<b>convicted [4]</b> 90/16 147/23 148/13 163/9	<b>cost [1]</b> 99/13
<b>complexity [1]</b> 156/4	<b>confirmed [4]</b> 55/10 65/1 95/3 108/22	<b>containing [1]</b> 70/1	<b>convictions [8]</b> 5/8 5/21 6/6 11/8 142/11 142/15 143/7 184/20	<b>costly [1]</b> 32/5
<b>compliantly [1]</b> 16/5	<b>confirming [1]</b> 109/25	<b>contemplated [4]</b> 73/5 116/1 116/11 116/19	<b>Coomber [1]</b> 52/18	<b>costs [2]</b> 86/4 156/4
<b>complied [2]</b> 150/4 150/10	<b>confirms [1]</b> 52/22	<b>contemplation [1]</b> 188/22	<b>copied [5]</b> 61/12 63/21 123/11 136/19 186/8	<b>could [62]</b> 9/4 9/6 9/10 15/8 19/6 20/1 23/23 24/18 29/7 29/17 31/10 32/19 36/7 37/22 40/9 40/16 44/3 45/22 50/24 54/10 55/20 55/21 55/24 65/21 69/13 75/10 80/20 85/4 85/23 88/13 88/13 95/9 99/22 100/23 104/3 104/14 104/14 104/16 116/8 116/12 117/8 120/8 120/10 121/17 123/24 133/21 136/6 138/13 141/25 142/10 142/17 143/8 143/11 143/13 143/20 147/3 147/4 147/16 147/17 159/2 190/24 195/11
<b>comply [3]</b> 150/7 150/12 150/22	<b>confused [1]</b> 125/22	<b>contemporaneous</b> <b>[1]</b> 124/7	<b>copied/pasted [1]</b> 123/11	
<b>complying [1]</b> 192/14	<b>confusing [1]</b> 75/10	<b>contemptible [1]</b> 90/20	<b>Copies [2]</b> 159/23 159/25	
<b>component [1]</b> 17/6	<b>connected [3]</b> 2/15 2/18 35/12	<b>content [8]</b> 7/16 59/15 59/16 59/17 68/16 103/20 127/15 154/14	<b>copy [5]</b> 1/17 41/10 41/15 87/9 186/7	
<b>comprehensibly [1]</b> 121/10	<b>connection [3]</b> 58/4 116/10 185/21	<b>contents [1]</b> 3/22	<b>copying [2]</b> 46/18	
<b>comprehensive [2]</b> 61/7 175/23	<b>connotation [1]</b> 144/14			
<b>computer [9]</b> 39/13 56/22 57/1 58/3 175/14 175/19 180/23 182/5 182/25	<b>conscious [1]</b> 100/17			
<b>concept [3]</b> 120/1 120/5 124/23	<b>consciously [1]</b> 117/4			
<b>concepts [1]</b> 62/17	<b>conse [1]</b> 159/14			
<b>concern [12]</b> 9/5 99/22 106/8 106/10 111/22 112/4 118/11 119/15 142/6 152/5 155/2 155/17				
<b>concerned [19]</b> 6/2 8/11 8/21 26/17 27/3 72/3 84/21 86/3 92/17 92/21 97/8 117/20 120/17 121/12 142/2 142/6 146/3 176/12				

<p><b>C</b></p> <p><b>couldn't [7]</b> 10/24 51/15 67/24 69/12 93/3 120/19 164/14</p> <p><b>council [1]</b> 168/16</p> <p><b>counsel [9]</b> 73/10 73/13 73/17 76/14 77/21 112/1 168/22 170/1 173/20</p> <p><b>counsel's [1]</b> 74/4</p> <p><b>counter [2]</b> 129/21 177/2</p> <p><b>counterparty [1]</b> 101/4</p> <p><b>country [2]</b> 6/12 118/13</p> <p><b>couple [5]</b> 49/3 74/6 115/17 180/8 182/21</p> <p><b>course [12]</b> 1/6 12/12 59/22 65/16 74/15 82/13 88/4 113/15 117/4 124/25 152/14 152/20</p> <p><b>court [32]</b> 72/5 83/2 83/10 94/9 107/9 108/12 108/22 109/11 110/8 110/15 110/22 146/16 148/1 150/5 150/10 151/9 152/1 153/16 155/18 155/24 156/4 156/14 163/8 167/2 167/18 167/21 169/15 171/20 171/22 173/5 173/7 190/3</p> <p><b>cover [4]</b> 37/5 147/14 148/2 180/14</p> <p><b>covered [4]</b> 47/4 64/25 65/2 137/22</p> <p><b>covering [1]</b> 70/13</p> <p><b>covers [1]</b> 56/11</p> <p><b>CQ [4]</b> 106/22 106/22 106/24 108/7</p> <p><b>create [1]</b> 138/12</p> <p><b>created [4]</b> 116/13 122/5 122/6 180/10</p> <p><b>creating [1]</b> 72/14</p> <p><b>creation [1]</b> 138/18</p> <p><b>credibility [1]</b> 156/3</p> <p><b>Crichton [3]</b> 123/4 136/19 153/10</p> <p><b>crime [3]</b> 2/14 2/18 90/15</p> <p><b>criminal [53]</b> 2/15 2/19 5/8 13/1 13/2 13/8 13/14 13/15 13/22 13/24 14/3 14/5 14/7 15/21 15/24 16/4 16/7 53/9 55/23 65/9 85/16 127/18 130/1 133/3 133/14 134/2 137/8 138/11 140/2 141/23 142/1 142/7 145/23 148/23 150/24</p>	<p>151/10 155/20 156/11 156/14 163/13 166/4 167/8 167/9 171/5 176/13 177/4 177/7 188/12 189/6 189/9 190/3 192/8 192/11</p> <p><b>criminally [1]</b> 155/21</p> <p><b>criminals' [1]</b> 53/17</p> <p><b>criteria [1]</b> 193/7</p> <p><b>critical [1]</b> 132/12</p> <p><b>criticism [3]</b> 65/24 66/10 66/13</p> <p><b>criticisms [3]</b> 154/25 155/10 155/12</p> <p><b>cross [6]</b> 2/6 2/12 2/17 2/24 116/5 153/18</p> <p><b>cross-applying [1]</b> 116/5</p> <p><b>crossed [1]</b> 15/7</p> <p><b>Crown [2]</b> 15/18 127/18</p> <p><b>crystallised [1]</b> 101/25</p> <p><b>current [6]</b> 46/17 46/23 60/16 102/16 136/9 136/10</p> <p><b>cursor [1]</b> 43/13</p> <p><b>customer [2]</b> 17/7 36/2</p> <p><b>customer-facing [1]</b> 17/7</p> <p><b>customers [2]</b> 36/5 144/7</p> <p><b>cute' [1]</b> 169/5</p> <p><b>cuts [2]</b> 52/19 126/21</p> <p><b>cynical [3]</b> 43/17 44/3 44/17</p>	<p>67/25 178/5</p> <p><b>Dave [1]</b> 121/2</p> <p><b>DAVID [3]</b> 1/7 1/12 199/2</p> <p><b>Davies [10]</b> 29/12 29/22 46/18 46/21 58/14 60/12 61/3 61/11 86/11 87/14</p> <p><b>Davies' [1]</b> 42/4</p> <p><b>day [6]</b> 38/4 110/22 144/4 144/10 174/21 198/1</p> <p><b>days [3]</b> 47/1 111/8 126/6</p> <p><b>de [1]</b> 17/20</p> <p><b>deal [9]</b> 1/24 5/16 5/18 5/20 18/1 76/13 130/22 141/5 159/13</p> <p><b>dealing [9]</b> 15/22 24/17 71/4 71/24</p> <p>146/18 149/7 163/19 164/5 183/14</p> <p><b>dealings [3]</b> 70/16 90/4 96/10</p> <p><b>dealt [3]</b> 54/3 149/16 176/10</p> <p><b>debate [1]</b> 50/8</p> <p><b>decade [2]</b> 8/5 33/15</p> <p><b>deceive [1]</b> 47/23</p> <p><b>December [4]</b> 29/11 30/5 30/19 41/23</p> <p><b>decency [1]</b> 85/8</p> <p><b>decent [1]</b> 85/10</p> <p><b>deception [2]</b> 48/10 48/12</p> <p><b>deceptive [1]</b> 48/24</p> <p><b>decide [1]</b> 78/4</p> <p><b>decided [2]</b> 53/3 129/21</p> <p><b>decision [7]</b> 12/5 86/15 130/9 145/10 147/18 148/3 148/4</p> <p><b>declarations [1]</b> 174/8</p> <p><b>declared [1]</b> 174/11</p> <p><b>declined [1]</b> 62/4</p> <p><b>deep [2]</b> 21/9 101/24</p> <p><b>deeply [2]</b> 22/3 44/17</p> <p><b>defamation [7]</b> 111/18 111/21 112/9 112/12 112/17 112/23 113/5</p> <p><b>defect [2]</b> 126/23 126/25</p> <p><b>defective [2]</b> 15/17 15/19</p> <p><b>defects [6]</b> 12/14 136/2 156/10 156/21 157/2 157/19</p> <p><b>defence [17]</b> 50/5 53/19 54/7 54/12 69/19 70/2 70/6 129/20 130/7 150/5 150/11 168/16 168/22</p>	<p>170/1 187/3 192/16 192/22</p> <p><b>defend [1]</b> 16/14</p> <p><b>defendant [2]</b> 159/19 189/7</p> <p><b>defendants [5]</b> 145/12 147/23 148/14 163/9 189/15</p> <p><b>defended [1]</b> 57/7</p> <p><b>defensible [2]</b> 102/22 106/12</p> <p><b>defensive [3]</b> 104/12 104/14 154/1</p> <p><b>definitely [3]</b> 59/16 109/13 132/9</p> <p><b>definitive [1]</b> 102/19</p> <p><b>deft [1]</b> 159/18</p> <p><b>delay [2]</b> 73/20 90/24</p> <p><b>delayed [1]</b> 73/13</p> <p><b>delays [1]</b> 41/13</p> <p><b>deliberate [3]</b> 140/19 140/22 148/8</p> <p><b>deliberately [1]</b> 37/5</p> <p><b>delivered [1]</b> 31/23</p> <p><b>delivery [1]</b> 9/5</p> <p><b>Deloitte [4]</b> 19/13 19/14 19/16 20/18</p> <p><b>demand [1]</b> 151/1</p> <p><b>demonstrable [1]</b> 113/6</p> <p><b>demonstrate [1]</b> 189/20</p> <p><b>demonstrating [1]</b> 14/15</p> <p><b>den [6]</b> 86/7 86/10 88/8 93/18 94/7 94/22</p> <p><b>department [5]</b> 124/24 133/6 151/14 180/12 190/10</p> <p><b>departmental [1]</b> 140/11</p> <p><b>departments [1]</b> 133/6</p> <p><b>depend [3]</b> 8/3 8/25 78/19</p> <p><b>depending [1]</b> 9/8</p> <p><b>depends [3]</b> 75/6 112/13 132/22</p> <p><b>depths [1]</b> 108/6</p> <p><b>deputy [1]</b> 120/25</p> <p><b>derived [1]</b> 186/1</p> <p><b>describe [6]</b> 13/2 16/3 24/8 25/7 119/15 124/5</p> <p><b>described [10]</b> 14/6 14/8 14/15 17/13 25/5 35/9 81/10 118/8 124/19 130/23</p> <p><b>describing [2]</b> 15/12 119/17</p> <p><b>designated [1]</b> 117/25</p> <p><b>designed [1]</b> 164/1</p> <p><b>desirable [1]</b> 71/1</p>	<p><b>Desk [1]</b> 31/22</p> <p><b>despite [1]</b> 56/16</p> <p><b>destroyed [1]</b> 85/10</p> <p><b>detail [9]</b> 30/21 47/3 47/13 73/11 98/7 100/14 102/5 108/1 108/6</p> <p><b>detailed [4]</b> 1/15 4/2 4/6 47/8</p> <p><b>details [2]</b> 123/9 155/14</p> <p><b>determinative [1]</b> 188/9</p> <p><b>determine [4]</b> 99/9 99/19 159/18 192/22</p> <p><b>determined [3]</b> 96/21 96/23 115/7</p> <p><b>determining [2]</b> 23/11 132/12</p> <p><b>developed [1]</b> 115/23</p> <p><b>developing [2]</b> 12/13 12/17</p> <p><b>development [4]</b> 23/12 139/1 139/2 139/13</p> <p><b>devoted [1]</b> 4/2</p> <p><b>dialogue [3]</b> 24/20 34/24 35/10</p> <p><b>dice [1]</b> 50/18</p> <p><b>Dickinson [14]</b> 63/19 63/22 64/8 68/25 70/17 72/23 72/25 73/8 83/5 103/14 115/17 128/20 137/6 147/2</p> <p><b>dictionary [1]</b> 27/12</p> <p><b>did [146]</b> 8/21 8/24 9/24 10/6 10/13 10/22 11/13 11/16 12/10 13/4 13/17 13/20 14/9 14/19 15/22 17/9 18/22 19/2 19/3 19/4 19/21 20/9 20/17 25/25 26/20 27/24 31/12 34/13 34/16 35/1 38/20 39/5 43/24 44/6 48/1 48/16 49/2 49/5 49/8 51/4 52/7 56/12 62/6 62/13 62/14 62/22 64/24 67/9 67/12 67/24 68/1 68/5 68/18 68/23 70/10 70/18 71/5 71/21 77/14 87/25 88/18 89/21 90/15 92/16 93/23 95/19 96/4 96/22 96/25 98/6 104/20 104/22 108/1 108/5 109/1 109/18 109/24 110/23 111/2 111/20 113/2 115/5 127/19 129/3 129/13 129/17 129/24 131/20 132/1 132/24 133/5</p>
--	--	---	--	---

<b>D</b>	25/11 25/20 42/11 42/14 44/3 60/15 <b>disagree [5]</b> 66/11 67/9 71/14 71/20 71/21 <b>disagreed [2]</b> 67/4 78/12 <b>disappointed [1]</b> 156/7 <b>discharge [3]</b> 75/24 80/12 118/22 <b>discharges [2]</b> 116/24 116/24 <b>disclaimer [1]</b> 13/25 <b>disclosable [3]</b> 74/10 189/24 190/2 <b>disclose [14]</b> 73/3 75/22 78/16 79/24 80/11 91/17 130/5 147/23 163/5 177/25 189/15 190/6 190/19 192/15 <b>disclosed [25]</b> 65/3 72/15 73/9 73/17 75/9 76/14 88/6 145/11 145/23 146/1 147/12 157/2 177/18 177/19 178/7 186/13 186/23 187/11 187/25 190/7 190/18 190/19 196/6 196/7 196/17 <b>disclosing [8]</b> 70/3 70/5 72/4 80/6 115/10 156/9 156/21 157/19 <b>disclosure [57]</b> 15/19 64/10 64/24 66/4 66/7 66/23 67/5 69/1 69/2 69/4 69/8 69/9 69/16 69/18 69/21 70/13 74/14 74/22 74/25 75/3 75/4 76/4 76/25 79/1 79/9 79/12 79/15 79/25 80/9 81/1 81/3 130/10 132/13 135/23 136/4 138/14 145/15 151/17 156/14 176/14 177/22 182/12 185/11 187/2 189/9 189/11 189/14 189/21 190/4 190/15 190/16 192/21 193/25 194/6 194/14 196/10 196/16 <b>disclosures [1]</b> 176/16 <b>disconnect [1]</b> 27/10 <b>discover [5]</b> 156/7 157/7 158/2 162/18 164/12 <b>discovered [4]</b> 156/19 156/25 157/18 162/14 <b>Discovering [1]</b> 165/14	<b>discovery [2]</b> 157/22 158/3 <b>discreditable [1]</b> 146/15 <b>discredited [1]</b> 147/13 <b>discrepancies [2]</b> 55/22 95/1 <b>discuss [8]</b> 12/6 66/14 70/12 102/17 103/6 154/15 181/23 195/15 <b>discussed [8]</b> 83/10 83/21 118/25 119/3 146/10 171/16 182/7 191/14 <b>discussing [1]</b> 163/12 <b>discussion [12]</b> 17/4 28/2 37/22 142/25 144/21 144/23 152/13 163/10 164/21 167/7 177/13 183/10 <b>discussions [5]</b> 120/7 130/4 145/9 151/15 166/17 <b>disdain [1]</b> 14/15 <b>dismissive [1]</b> 110/22 <b>dispute [2]</b> 9/18 153/23 <b>disseminated [1]</b> 145/8 <b>distil [5]</b> 7/9 8/8 121/8 128/8 130/24 <b>distinguish [1]</b> 36/12 <b>distribution [1]</b> 122/14 <b>dive [2]</b> 71/25 101/24 <b>do [138]</b> 2/12 3/6 5/18 5/20 6/22 7/2 7/5 12/16 13/16 16/6 16/11 16/11 18/4 18/22 20/23 22/5 22/9 23/4 26/20 27/11 30/15 32/8 32/15 33/8 33/13 36/21 39/15 42/25 44/9 44/18 45/1 46/4 52/12 59/5 62/22 66/8 66/11 66/24 67/10 67/18 68/4 68/5 68/14 68/15 68/18 69/3 69/13 70/17 70/23 71/3 71/10 71/17 75/15 75/18 75/21 76/2 77/15 78/4 78/8 78/17 78/18 79/3 80/4 81/5 82/24 85/20 87/3 87/12 90/19 92/2 94/12 94/13 95/14 96/12 97/3 97/4 99/6 107/14 119/11 119/23 121/17 124/8 124/21 125/8 133/9 141/19	142/19 145/21 146/12 148/3 149/4 149/12 150/15 153/25 158/6 158/9 159/15 159/25 160/7 160/21 161/18 162/11 162/22 163/1 163/4 163/9 163/16 164/9 165/2 166/15 166/16 166/22 167/17 168/2 168/17 169/24 169/25 170/8 170/20 171/11 181/12 183/3 183/17 183/20 184/8 184/17 184/24 185/2 187/21 187/21 188/14 190/8 190/19 193/13 193/14 195/8 197/4 197/21 <b>document [25]</b> 26/5 29/5 46/13 60/6 66/10 68/16 70/6 74/23 76/10 80/21 81/10 81/23 82/5 82/14 102/18 123/6 158/9 165/12 181/13 190/1 190/8 190/11 190/16 191/23 194/3 <b>documentation [2]</b> 84/18 84/20 <b>documented [1]</b> 84/23 <b>documents [34]</b> 26/2 41/15 64/17 64/25 67/15 68/14 69/7 69/19 72/15 73/3 73/25 74/10 74/20 75/22 75/25 79/23 80/6 81/4 81/5 81/18 82/8 93/25 104/6 115/10 119/22 124/5 177/11 178/16 180/3 180/5 180/6 180/8 181/14 193/23 <b>does [28]</b> 5/11 5/25 27/17 27/19 42/15 51/13 69/4 78/11 79/14 80/18 84/12 84/15 94/25 124/20 133/13 133/15 150/2 160/18 160/25 161/1 161/6 163/16 167/12 167/17 167/23 168/8 183/11 187/4 <b>doesn't [10]</b> 27/5 33/23 38/25 52/9 105/4 127/2 162/2 164/1 193/20 196/22 <b>dogged [2]</b> 96/21 96/22 <b>doing [26]</b> 12/22 17/22 18/6 34/19 69/8 74/1 74/18 76/8 76/22 77/16 78/14 79/8 97/2 103/8 119/13 137/9	144/3 164/8 165/9 166/23 167/6 175/8 183/7 183/16 183/20 184/8 <b>domain [5]</b> 102/21 122/9 123/3 177/8 191/16 <b>dominant [3]</b> 3/6 3/8 3/16 <b>don't [224]</b> <b>done [25]</b> 5/19 13/6 18/15 19/5 20/2 20/20 22/5 22/9 33/4 67/1 72/13 119/16 150/20 164/11 164/23 165/8 165/13 165/14 165/16 166/6 167/3 167/25 173/24 175/25 179/1 <b>double [2]</b> 52/13 168/5 <b>double-sided [1]</b> 52/13 <b>doubt [2]</b> 67/22 190/1 <b>down [45]</b> 4/1 9/22 16/1 17/9 17/10 23/8 24/7 30/22 33/16 41/20 47/9 49/22 54/25 56/13 61/2 63/4 63/17 65/10 80/17 82/15 91/22 94/4 96/9 99/3 99/17 99/18 101/11 101/16 101/18 114/3 138/16 146/2 159/22 162/5 164/6 165/21 170/23 179/21 180/22 182/2 182/3 182/24 183/18 185/7 191/13 <b>dozen [2]</b> 18/16 175/15 <b>draft [19]</b> 56/8 64/15 91/7 94/10 99/3 102/16 103/6 115/15 120/22 121/5 137/2 141/4 154/16 157/12 159/4 159/7 159/8 172/3 193/10 <b>drafting [7]</b> 64/17 77/24 91/21 115/19 147/5 157/5 194/21 <b>drafts [4]</b> 121/3 153/13 153/17 171/25 <b>draw [2]</b> 35/18 92/13 <b>drawn [1]</b> 147/7 <b>drift [1]</b> 95/22 <b>dropped [1]</b> 166/3 <b>due [4]</b> 12/12 14/12 16/17 82/12 <b>duplicated [1]</b> 180/24 <b>during [4]</b> 65/13 65/16 137/3 137/14 <b>duties [32]</b> 15/20 20/6 74/14 79/1 79/10 79/12 79/15 79/25
----------	--	--	---	--

<b>D</b>	<b>effectively [2]</b> 117/25 191/2	<b>emphasised [1]</b> 109/15	93/15 99/23 181/12	197/19
<b>duties... [24]</b> 119/7 136/5 138/24 145/15 150/5 150/10 151/8 151/16 152/1 156/13 163/8 165/25 166/6 166/14 167/1 169/15 170/14 171/1 171/3 171/4 171/7 171/20 171/21 172/19	<b>eg [4]</b> 36/13 99/23 186/25 187/1	<b>employee [5]</b> 4/13 84/25 146/9 147/1 170/11	<b>Error' [1]</b> 181/2	<b>evidential [1]</b> 177/6
<b>duty [15]</b> 73/2 75/22 75/24 78/16 80/8 80/10 80/12 138/19 150/8 150/22 167/21 174/7 176/14 177/21 192/15	<b>eg inadequate [1]</b> 99/23	<b>employees [3]</b> 84/18 146/14 169/14	<b>errors [8]</b> 3/19 12/14 72/3 84/7 90/22 94/24 95/6 177/2	<b>exact [1]</b> 57/4
<b>E</b>	<b>eg retirement [1]</b> 36/13	<b>Employment [2]</b> 182/12 182/13	<b>escalated [2]</b> 24/23 72/24	<b>exactly [6]</b> 33/19 97/15 112/15 144/6 144/6 175/16
<b>E100 [1]</b> 101/13	<b>eg the [2]</b> 186/25 187/1	<b>end [9]</b> 6/21 7/14 15/16 45/18 53/9 74/8 83/25 92/14 177/12	<b>escalating [1]</b> 153/22	<b>examine [2]</b> 23/8 98/11
<b>E104 [1]</b> 60/9	<b>either [27]</b> 18/7 20/5 32/19 33/5 41/8 64/7 68/22 70/8 78/3 79/21 81/11 92/2 103/1 104/17 105/9 105/16 117/5 117/14 118/3 118/5 124/11 141/8 142/17 147/25 153/24 170/6 193/8	<b>ended [1]</b> 117/15	<b>especially [4]</b> 7/16 51/1 73/5 137/9	<b>examined [2]</b> 98/9 103/5
<b>E18 [1]</b> 98/14	<b>elevated [1]</b> 109/15	<b>ends [1]</b> 80/9	<b>esprit [1]</b> 17/20	<b>example [7]</b> 25/17 34/22 51/14 132/11 157/20 182/25 192/19
<b>E28 [2]</b> 93/22 94/2	<b>else [16]</b> 20/17 43/1 54/15 69/13 88/2 94/12 110/2 150/20 152/12 162/6 162/17 170/4 172/5 179/8 183/16 187/6	<b>engage [4]</b> 28/11 92/9 111/20 183/21	<b>essentially [12]</b> 24/7 29/12 30/25 66/21 78/24 83/18 86/16 99/5 115/24 118/1 131/3 163/7	<b>examples [7]</b> 27/4 27/5 28/11 61/23 143/24 160/10 160/13
<b>E37 [1]</b> 71/23	<b>else's [1]</b> 77/10	<b>engaged [5]</b> 25/21 77/21 100/8 130/4 151/14	<b>estimate [1]</b> 129/19	<b>excellent [1]</b> 60/22
<b>E43 [1]</b> 106/17	<b>email [75]</b> 2/3 2/9 29/6 29/10 29/25 30/25 31/4 31/7 39/4 41/21 41/25 42/5 42/17 43/8 43/11 44/8 44/22 45/15 46/17 47/13 49/22 50/7 50/17 50/22 55/3 60/12 61/11 63/18 63/20 64/13 64/14 64/15 66/19 67/13 67/21 69/20 70/21 72/8 72/11 72/19 77/9 77/23 77/24 84/1 85/7 85/25 86/6 86/8 89/20 91/15 92/7 95/13 96/16 98/24 102/9 111/7 120/23 121/4 122/13 123/1 123/12 128/18 136/18 137/2 137/13 141/8 153/9 154/11 179/22 179/25 181/22 183/2 185/10 191/7 194/24	<b>engaging [2]</b> 25/16 99/7	<b>et [2]</b> 26/24 40/25	<b>exchange [9]</b> 44/6 44/23 45/19 114/19 122/23 123/15 123/20 124/9 128/18
<b>E5 [1]</b> 49/18	<b>email [75]</b> 2/3 2/9 29/6 29/10 29/25 30/25 31/4 31/7 39/4 41/21 41/25 42/5 42/17 43/8 43/11 44/8 44/22 45/15 46/17 47/13 49/22 50/7 50/17 50/22 55/3 60/12 61/11 63/18 63/20 64/13 64/14 64/15 66/19 67/13 67/21 69/20 70/21 72/8 72/11 72/19 77/9 77/23 77/24 84/1 85/7 85/25 86/6 86/8 89/20 91/15 92/7 95/13 96/16 98/24 102/9 111/7 120/23 121/4 122/13 123/1 123/12 128/18 136/18 137/2 137/13 141/8 153/9 154/11 179/22 179/25 181/22 183/2 185/10 191/7 194/24	<b>England [1]</b> 6/16	<b>et cetera [1]</b> 40/25	<b>exchanges [2]</b> 41/18 115/22
<b>E51 [2]</b> 29/8 29/9	<b>emailing [2]</b> 64/8 111/9	<b>enjoy [1]</b> 70/10	<b>even [10]</b> 13/19 14/7 21/12 61/7 62/3 107/11 140/1 168/10 171/18 185/2	<b>excluding [1]</b> 1/18
<b>E57 [1]</b> 49/16	<b>emails [15]</b> 14/13 44/6 44/10 44/24 67/14 67/16 67/22 70/14 82/22 84/5 90/7 96/8 121/12 121/22 130/17	<b>enjoyed [1]</b> 188/2	<b>evening [1]</b> 93/24	<b>exclusively [1]</b> 8/10
<b>E65 [2]</b> 58/6 58/7	<b>embark [1]</b> 197/3	<b>enough [2]</b> 14/23 152/8	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>excuse [1]</b> 71/1
<b>E68 [1]</b> 83/23	<b>embedded [1]</b> 30/24	<b>enquire [1]</b> 83/19	<b>events [11]</b> 4/4 4/8 6/1 21/9 21/13 22/1 49/12 82/23 84/24 85/1 152/16	<b>executive [5]</b> 58/15 86/6 91/8 93/8 193/3
<b>E69 [1]</b> 90/5	<b>emboldened [1]</b> 193/18	<b>enquiry [4]</b> 30/13 83/19 88/25 131/17	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>Executive's [1]</b> 191/9
<b>E77 [2]</b> 154/6 154/8	<b>emphasis [1]</b> 189/6	<b>ensured [1]</b> 127/8	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>executives [6]</b> 13/3 13/21 62/24 93/12 119/4 127/9
<b>E80 [3]</b> 98/13 98/14 98/15		<b>ensure [11]</b> 9/2 24/21 24/24 90/17 91/12 102/21 137/18 140/3 146/12 156/13 187/5	<b>evening [1]</b> 93/24	<b>exchanged [1]</b> 44/11
<b>E82 [1]</b> 111/5		<b>ensuring [1]</b> 189/6	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exchanges [2]</b> 41/18 115/22
<b>E86 [2]</b> 41/10 41/20		<b>enter [2]</b> 102/20 177/13	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>excluded [1]</b> 1/18
<b>E91 [3]</b> 52/4 52/8 52/11		<b>entered [5]</b> 84/17 117/6 122/9 147/14 177/8	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>excuse [1]</b> 71/1
<b>E92 [1]</b> 54/24		<b>entering [1]</b> 148/1	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>executive [5]</b> 58/15 86/6 91/8 93/8 193/3
<b>E96 [2]</b> 158/22 158/24		<b>enters [1]</b> 37/6	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>Executive's [1]</b> 191/9
<b>each [7]</b> 18/24 32/14 34/1 53/12 102/1 137/23 197/15		<b>entire [3]</b> 17/11 32/4 76/7	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>executives [6]</b> 13/3 13/21 62/24 93/12 119/4 127/9
<b>earlier [12]</b> 3/13 35/24 40/23 42/5 43/9 55/12 64/23 83/15 114/18 137/1 163/4 190/13		<b>entirely [1]</b> 8/18	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exercise [2]</b> 66/4 101/3
<b>early [9]</b> 11/17 19/14 66/6 102/6 111/15 174/24 175/3 175/9 176/1		<b>entirety [2]</b> 10/8 45/15	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exercised [1]</b> 142/19
<b>easily [1]</b> 123/12		<b>entity [1]</b> 113/5	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exercises [1]</b> 69/9
<b>easy [1]</b> 123/7		<b>environment [3]</b> 3/1 16/22 16/25	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exhaustive [1]</b> 56/19
<b>eccentric [2]</b> 34/7 34/13		<b>equals [1]</b> 161/24	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exhibit [1]</b> 1/18
<b>editor [3]</b> 46/17 50/10 60/16		<b>equanimity [1]</b> 14/21	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exhibited [1]</b> 46/13
<b>Edwards [4]</b> 191/7 192/7 194/4 194/12		<b>Er [1]</b> 178/9	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>exists [2]</b> 73/4 84/15
<b>effect [8]</b> 25/24 26/7 26/10 70/22 82/5 105/17 123/5 190/21		<b>Err [1]</b> 43/4	<b>event [7]</b> 50/13 64/7 64/20 84/22 141/12 182/8 188/13	<b>existed [1]</b> 81/13

<b>E</b>	158/4 167/19 <b>factor</b> [1] 117/3 <b>factors</b> [1] 55/20 <b>facts</b> [4] 53/13 58/22 157/7 157/18 <b>factual</b> [2] 111/16 112/8 <b>factually</b> [1] 147/18 <b>failed</b> [9] 58/22 150/7 150/11 150/22 170/9 170/12 170/25 171/18 172/18 <b>failings</b> [2] 90/21 152/6 <b>fair</b> [12] 5/11 18/21 24/10 52/2 54/20 54/22 101/5 104/17 110/18 119/18 120/6 184/1 <b>fairer</b> [2] 58/24 59/4 <b>fairly</b> [3] 15/6 36/14 81/15 <b>fairness</b> [3] 14/21 17/18 160/20 <b>faith</b> [3] 61/20 62/15 62/16 <b>Falkirk</b> [6] 125/17 127/4 129/5 134/12 134/13 181/7 <b>Falkirk/Callendar</b> [1] 134/13 <b>falls</b> [1] 155/10 <b>false</b> [2] 16/16 95/9 <b>falsified</b> [1] 95/4 <b>falsify</b> [1] 37/6 <b>familiar</b> [8] 93/24 97/14 120/1 120/5 124/22 125/11 126/12 185/15 <b>familiarising</b> [2] 46/9 165/11 <b>familiarity</b> [3] 7/13 151/11 188/11 <b>fancy</b> [1] 34/7 <b>fantasy</b> [1] 34/14 <b>far</b> [21] 21/16 21/25 22/2 25/8 26/17 27/3 42/23 43/25 80/16 82/25 90/24 97/8 97/12 108/15 109/9 112/18 117/19 118/10 119/1 132/9 182/13 <b>farce</b> [1] 85/17 <b>fault</b> [3] 8/18 55/16 55/21 <b>fault'</b> [1] 169/1 <b>faults</b> [3] 55/18 129/15 180/10 <b>faults/problems</b> [1] 180/10 <b>favour</b> [1] 101/3 <b>fear</b> [4] 36/20 37/4 42/25 161/12 <b>fear'</b> [1] 42/22	<b>featured</b> [2] 60/21 62/3 <b>fed</b> [1] 134/1 <b>feedback</b> [6] 31/18 31/23 32/1 32/3 33/8 36/2 <b>feeds</b> [1] 35/15 <b>feel</b> [3] 16/22 38/25 62/23 <b>feeling</b> [9] 16/18 16/19 18/5 25/15 37/25 54/21 96/8 157/11 157/14 <b>feels</b> [1] 124/7 <b>feet</b> [1] 40/4 <b>felt</b> [9] 5/14 23/22 24/23 25/14 94/17 110/10 115/9 116/21 193/21 <b>fended</b> [1] 183/24 <b>few</b> [7] 3/20 29/18 31/11 32/6 55/4 84/10 124/15 <b>field</b> [1] 63/15 <b>figure</b> [1] 11/12 <b>figures</b> [2] 37/6 84/15 <b>file</b> [1] 59/11 <b>files</b> [1] 125/2 <b>film</b> [1] 47/14 <b>filmed</b> [1] 46/23 <b>filter</b> [1] 105/22 <b>final</b> [9] 56/6 56/16 56/17 57/9 78/22 102/20 114/5 167/14 168/4 <b>finally</b> [1] 50/3 <b>Financial</b> [1] 121/2 <b>find</b> [18] 23/5 63/24 67/24 69/17 72/10 77/25 83/1 92/3 92/4 131/8 131/15 131/23 131/23 132/18 133/20 147/19 153/13 180/16 <b>finding</b> [1] 104/4 <b>findings</b> [3] 55/6 108/24 192/15 <b>finds</b> [1] 90/12 <b>fine</b> [9] 28/23 29/3 32/12 33/25 64/3 71/12 82/11 113/17 113/17 <b>finish</b> [1] 98/3 <b>finished</b> [2] 24/25 73/17 <b>firm</b> [5] 52/20 53/10 53/16 82/24 192/20 <b>firmly</b> [2] 72/22 104/19 <b>firms</b> [1] 77/21 <b>first</b> [43] 7/7 13/17 20/24 28/22 53/5 53/8 64/16 71/2 76/13 85/7 86/20 90/10 99/2	100/6 102/6 107/23 112/25 117/5 121/7 125/24 126/23 131/20 132/6 133/12 133/17 133/17 133/22 134/11 134/23 139/11 141/10 159/2 159/6 159/8 165/23 169/20 172/25 174/19 175/2 175/24 176/7 186/12 187/11 <b>firstly</b> [4] 18/22 66/22 109/25 161/7 <b>fit</b> [2] 9/6 99/10 <b>five</b> [3] 3/4 111/8 141/18 <b>FJ</b> [2] 159/6 169/7 <b>flaws</b> [2] 55/14 86/25 <b>Flemington</b> [5] 10/4 98/24 136/19 153/11 186/8 <b>flight</b> [1] 34/7 <b>flights</b> [1] 34/13 <b>flowed</b> [1] 122/3 <b>fluffing</b> [1] 102/4 <b>Foat</b> [3] 10/7 72/9 74/16 <b>focus</b> [4] 24/5 54/6 54/12 176/23 <b>focused</b> [4] 30/13 45/14 74/11 76/4 <b>focusing</b> [1] 40/10 <b>folded</b> [1] 145/18 <b>follow</b> [5] 5/25 74/12 123/18 151/2 179/14 <b>follow-on</b> [1] 151/2 <b>following</b> [11] 28/2 55/5 90/6 109/2 126/20 137/1 137/23 141/24 155/2 192/20 198/1 <b>follows</b> [1] 27/14 <b>foot</b> [22] 23/16 29/10 30/4 30/17 31/7 43/11 46/11 53/5 54/24 61/10 63/18 86/5 91/1 101/16 111/6 114/6 130/13 153/9 186/6 188/15 192/6 194/4 <b>footage</b> [1] 62/4 <b>footnote</b> [1] 103/17 <b>force</b> [1] 184/12 <b>forcing</b> [2] 181/1 181/25 <b>foremost</b> [1] 112/25 <b>forensically</b> [1] 110/8 <b>forgive</b> [1] 102/3 <b>form</b> [13] 14/19 16/8 103/20 107/1 142/11 142/14 143/5 143/7 143/13 190/8 190/9 190/16 197/4 <b>formal</b> [8] 9/10 24/23 58/25 69/21 81/11 124/15 154/13 192/18	<b>formally</b> [2] 61/8 62/1 <b>format</b> [2] 124/20 186/24 <b>formed</b> [3] 15/4 109/19 109/23 <b>former</b> [2] 85/21 87/5 <b>formulated</b> [1] 61/6 <b>formulation</b> [3] 13/23 35/6 103/10 <b>forthcoming</b> [1] 46/20 <b>fortune</b> [1] 57/14 <b>forum</b> [2] 31/23 140/6 <b>forward</b> [14] 92/11 92/15 93/6 94/20 102/24 111/15 121/6 139/1 141/11 141/22 167/7 179/10 196/14 196/23 <b>forwarded</b> [4] 2/3 47/10 55/25 56/2 <b>forwards</b> [2] 106/15 165/13 <b>found</b> [10] 55/13 63/15 77/17 131/17 133/21 139/14 154/23 177/17 180/17 188/4 <b>foundation</b> [1] 177/7 <b>founded</b> [2] 142/8 142/12 <b>four</b> [6] 1/23 3/18 58/12 100/7 111/8 115/8 <b>frame</b> [1] 142/21 <b>framework</b> [1] 115/11 <b>frank</b> [2] 67/20 183/1 <b>frankly</b> [1] 185/3 <b>frantic</b> [1] 67/22 <b>free</b> [2] 119/9 127/14 <b>free'</b> [1] 169/24 <b>Freedom</b> [4] 94/5 95/16 117/24 118/4 <b>Freeths</b> [4] 64/21 65/17 66/11 80/11 <b>French</b> [1] 46/16 <b>frequently</b> [1] 183/11 <b>Friday</b> [3] 85/21 93/24 111/15 <b>friendliness'</b> [1] 30/14 <b>front</b> [2] 1/17 76/11 <b>Fujitsu</b> [43] 72/13 115/22 126/11 129/17 133/23 134/15 134/19 136/3 140/7 140/10 140/13 140/24 146/9 146/10 146/12 147/1 147/1 147/4 153/14 153/19 153/22 153/25 154/2 154/16 155/10 156/2 156/8 156/16 160/4 163/19 167/8
----------	---	--	--	---

<b>F</b>	<b>germane [1]</b> 149/24	192/1 192/3 193/22	54/8 54/13	150/4 154/19 156/10
<b>Fujitsu... [12]</b> 168/14	<b>get [29]</b> 18/16 24/20	195/4 195/14	<b>guy [2]</b> 87/10 103/18	156/13 162/14 162/18
168/21 168/24 169/8	30/11 36/18 36/21	<b>goals [1]</b> 30/10		165/3 165/25 166/11
169/22 170/2 170/3	53/21 60/11 71/3	<b>goes [3]</b> 42/2 153/21	<b>H</b>	167/16 171/6 171/21
171/14 171/15 171/25	71/14 72/12 72/21	160/20	<b>had [208]</b>	181/6 181/11 192/11
174/19 188/23	97/6 97/10 98/6	<b>going [38]</b> 3/19 3/21	<b>hadn't [7]</b> 43/3 58/1	192/21 194/16
<b>Fujitsu's [2]</b> 74/11	100/20 100/22 107/3	4/6 12/12 18/8 39/14	74/19 87/23 149/21	<b>have [273]</b>
155/18	112/16 125/22 131/10	42/23 48/17 49/11	167/19 178/6	<b>haven't [13]</b> 22/4
<b>full [6]</b> 1/11 5/9 66/3	134/5 135/5 141/2	56/14 71/17 73/18	<b>half [4]</b> 3/4 30/20	26/9 26/13 27/12
132/13 180/19 191/24	154/5 181/14 182/18	76/15 77/19 91/6	37/18 175/15	47/13 81/24 110/3
<b>fully [4]</b> 156/9 156/21	184/21 191/23 195/23	103/6 107/9 113/1	<b>halfway [1]</b> 9/16	122/12 148/7 152/2
157/1 157/19	<b>gets [3]</b> 47/10 55/25	113/7 126/13 128/5	<b>hallmarks [2]</b> 95/15	167/25 180/16 180/21
<b>function [4]</b> 16/9	56/2	141/10 149/25 150/3	95/25	<b>having [17]</b> 28/9 30/7
106/24 135/24 138/22	<b>getting [7]</b> 28/5 30/8	159/16 161/11 171/15	<b>Hamilton [1]</b> 52/23	36/1 36/24 39/19
<b>functions [5]</b> 5/6	37/23 67/14 67/16	179/10 179/23 181/19	<b>hand [9]</b> 8/4 18/12	40/14 40/20 102/8
116/24 116/25 117/12	111/25 184/23	182/15 182/24 186/10	111/16 161/2 162/1	123/4 129/4 131/15
118/22	<b>giggle [1]</b> 92/22	195/10 196/13 196/16	164/5 165/21 168/4	148/4 156/10 163/11
<b>further [21]</b> 30/18	<b>gist [1]</b> 67/8	196/18 196/23	184/18	170/18 171/12 188/11
33/4 45/22 47/7 55/4	<b>give [23]</b> 1/11 1/13	<b>gone [6]</b> 19/8 23/1	<b>handled [2]</b> 145/7	<b>he [118]</b> 14/3 14/5
65/21 83/14 83/17	18/4 20/5 22/13 25/24	33/4 61/24 81/17	174/6	14/6 14/7 14/12 14/13
86/10 91/7 99/13	46/23 56/15 81/3 90/2	152/12	<b>hang [1]</b> 194/2	14/19 15/1 15/1 15/5
101/18 135/14 137/10	92/10 130/9 132/11	<b>good [11]</b> 1/3 1/9	<b>happen [7]</b> 48/17	15/16 16/5 16/9 29/12
153/21 154/25 155/14	133/3 145/19 152/4	37/14 60/2 61/20	78/1 84/3 85/23 93/16	29/19 31/1 35/22
177/21 177/22 180/4	173/10 186/19 188/4	62/15 62/16 68/17	160/5 160/7	38/10 38/10 38/16
196/10	190/15 192/2 193/8	113/22 113/24 152/25	<b>happened [8]</b> 6/1	39/17 39/21 39/21
<b>future [3]</b> 49/21	195/9	<b>got [27]</b> 27/12 38/21	81/14 81/15 82/23	40/17 41/14 42/6 42/7
136/3 136/9	<b>given [36]</b> 14/12	41/23 44/19 44/25	84/19 135/20 148/2	42/8 42/8 43/2 43/7
	18/18 18/20 41/14	45/16 53/25 54/19	191/1	43/10 43/11 43/19
<b>G</b>	47/18 48/8 48/14	54/21 91/24 92/8	<b>happening [8]</b> 18/8	45/7 45/12 55/1 55/2
<b>gain [1]</b> 134/25	68/25 70/2 73/11	114/22 119/7 122/12	47/15 77/25 84/22	55/3 55/19 61/18
<b>gained [4]</b> 2/12 2/13	80/24 83/5 91/4	126/3 127/22 133/11	85/19 92/12 144/9	61/19 61/21 61/21
2/17 51/6	100/15 105/5 116/14	134/15 134/17 139/3	191/25	61/24 64/16 84/7
<b>Gareth [13]</b> 141/21	116/22 117/11 118/7	146/13 151/20 151/22	<b>happens [4]</b> 22/22	84/25 88/11 88/11
141/25 160/25 161/16	132/14 138/17 142/2	161/3 173/14 180/4	85/12 85/21 162/3	88/12 88/12 88/14
161/17 161/20 164/8	145/6 146/2 146/5	184/6	<b>happiness [1]</b> 41/3	89/20 89/21 90/12
164/12 164/23 165/10	146/15 147/24 147/25	<b>govern [1]</b> 115/11	<b>happy [5]</b> 36/8 63/25	91/12 91/22 91/23
165/15 172/15 172/16	151/6 164/12 164/14	<b>Government [5]</b>	80/7 87/2 91/16	92/16 92/17 92/19
<b>gathering [1]</b> 7/21	164/17 167/9 167/16	42/13 44/2 55/6	<b>hard [7]</b> 1/17 15/13	92/20 92/22 92/24
<b>gauge [1]</b> 81/19	167/19 197/5	116/23 117/12	41/10 41/15 69/2 87/9	92/24 93/3 93/5 93/8
<b>gave [6]</b> 53/16 74/16	<b>giving [14]</b> 3/5 11/14	<b>grateful [2]</b> 41/19	123/3	95/6 95/23 96/2 96/4
98/5 109/5 113/3	12/8 13/3 13/21 26/6	60/21	<b>harder [2]</b> 72/20	96/5 103/19 103/25
190/5	26/10 73/20 77/9	<b>greater [1]</b> 51/20	122/10	104/2 107/13 110/17
<b>Gavin [2]</b> 102/10	88/20 89/21 93/5	<b>grind [4]</b> 51/2 51/5	<b>Harding [3]</b> 58/15	110/19 126/19 126/21
104/9	149/22 187/8	51/6 51/10	60/15 60/24	127/2 127/4 127/10
<b>general [9]</b> 16/17	<b>GJ [1]</b> 161/5	<b>grounds [5]</b> 12/3	<b>harm [14]</b> 21/9 21/10	127/24 128/1 128/15
16/19 24/16 27/2 28/3	<b>glance [1]</b> 107/11	66/1 112/20 112/22	21/11 21/12 21/14	128/25 129/3 129/5
36/11 112/1 141/24	<b>GLO [1]</b> 73/3	192/18	21/14 22/1 22/3 22/5	129/10 129/13 129/13
173/20	<b>go [60]</b> 3/19 21/16	<b>group [11]</b> 11/23	47/24 69/19 70/1 70/6	129/17 129/25 135/16
<b>generally [9]</b> 7/15	21/25 22/2 27/6 29/22	29/23 30/18 49/12	113/8	135/19 135/21 141/11
12/10 16/12 40/17	30/4 30/6 30/17 30/25	70/11 108/17 118/18	<b>has [64]</b> 5/6 10/8	149/21 150/11 156/20
69/1 72/18 74/23	31/4 33/5 35/18 45/25	122/24 172/11 179/24	14/12 14/13 15/16	161/24 162/15 163/7
87/10 96/4	47/9 49/20 50/6 50/16	183/8	22/25 27/15 27/16	166/1 166/4 170/2
<b>generate [1]</b> 195/5	52/6 56/4 58/12 61/2	<b>groups [2]</b> 137/19	29/1 31/1 32/3 41/13	171/6 171/21 175/8
<b>generated [5]</b> 77/18	63/19 80/16 82/13	137/22	41/23 47/19 48/15	180/7 189/23 191/8
122/5 186/4 190/23	83/25 85/12 90/11	<b>guarantee [1]</b> 99/14	53/12 55/5 55/9 55/15	191/9 193/11 194/16
195/3	91/1 91/10 94/20	<b>guess [7]</b> 26/21 41/2	56/21 56/25 61/16	<b>he'd [3]</b> 15/9 88/2
<b>generating [1]</b> 74/9	95/12 99/18 110/17	57/19 78/6 101/22	61/23 61/24 62/2 62/3	103/19
<b>genesis [1]</b> 97/13	110/22 112/18 113/24	168/23 188/20	64/17 65/1 65/18	<b>he'll [1]</b> 107/13
<b>genuine [3]</b> 95/14	115/14 117/8 126/8	<b>guidelines [13]</b> 50/24	65/20 74/13 79/14	<b>he's [6]</b> 39/17 40/12
97/6 97/10	126/10 126/13 126/14	51/19 51/25 64/11	84/19 86/24 90/18	42/10 87/4 92/7
<b>genuinely [4]</b> 92/17	129/22 132/9 135/13	64/22 64/24 65/2 65/5	91/15 91/24 95/15	171/18
92/25 96/6 166/22	135/15 137/2 138/3	65/25 66/5 66/8 66/17	105/18 113/5 120/22	<b>head [18]</b> 4/15 4/17
<b>George [1]</b> 62/5	142/23 164/6 179/25	69/25	122/20 141/15 144/13	4/18 9/18 9/23 9/25
	182/18 183/7 189/25	<b>guilty [4]</b> 16/15 53/19	147/24 147/25 148/12	10/1 10/6 14/3 14/6

<b>H</b>	187/20 193/11	<b>holding [2]</b> 87/4 174/11	109/1 115/6 118/8 127/19 127/25 133/13 133/15 141/2 142/9 145/6 162/23 163/1 167/7 169/22 178/19 181/24 183/7 183/10 183/14 185/24	<b>I came [3]</b> 6/21 97/12 130/22
<b>head... [8]</b> 15/24 59/9 60/17 120/23 127/18 129/25 135/18 141/2	<b>hesitate [1]</b> 66/15	<b>holds [1]</b> 89/3	<b>however [5]</b> 55/19 66/9 83/13 91/17 124/4	<b>I can [20]</b> 14/22 18/14 23/1 28/23 31/5 38/4 40/3 40/23 59/9 60/4 62/21 92/3 108/16 128/3 134/22 138/23 145/20 153/1 159/25 178/21
<b>headed [2]</b> 73/7 154/10	<b>hesitating [1]</b> 15/8	<b>hole [2]</b> 182/2 183/18	<b>HSF [2]</b> 72/22 72/24	<b>I can't [15]</b> 17/10 25/4 26/19 26/25 33/19 44/9 54/2 58/4 62/23 78/7 89/23 103/24 133/3 133/24 139/22
<b>header [1]</b> 187/6	<b>hesitation [1]</b> 190/3	<b>holes [3]</b> 182/4 182/24 184/2	<b>hub [3]</b> 135/24 140/6 140/23	<b>I cannot [1]</b> 166/16
<b>heading [2]</b> 23/17 193/2	<b>Hi [6]</b> 29/16 29/24 30/23 31/9 95/14 180/2	<b>homework [1]</b> 101/1	<b>huge [1]</b> 90/23	<b>I certainly [8]</b> 14/23 20/24 63/13 68/20 96/14 109/21 112/3 140/9
<b>Heads [2]</b> 4/20 4/24	<b>hidden [1]</b> 81/18	<b>honest [2]</b> 42/24 85/9	<b>Hugh [2]</b> 10/4 153/11	<b>I check [1]</b> 146/17
<b>hear [7]</b> 1/3 12/12 60/3 84/8 113/22 139/10 152/25	<b>hide [3]</b> 110/11 110/16 156/2	<b>Honestly [1]</b> 89/8		<b>I concerned [1]</b> 142/6
<b>heard [2]</b> 15/16 35/14	<b>high [19]</b> 10/13 39/12 39/24 57/3 57/4 57/11 57/15 73/9 73/16 74/4 75/9 85/1 107/9 108/12 108/22 109/11 110/8 110/15 193/13	<b>honour [2]</b> 43/21 71/11	<b>I accept [2]</b> 69/17 148/6	<b>I conclude [1]</b> 22/14
<b>hearing [3]</b> 25/16 36/25 198/1	<b>high-risk [3]</b> 73/16 74/4 75/9	<b>hoof [1]</b> 27/16	<b>I actually [2]</b> 100/12 185/23	<b>I confirm [1]</b> 102/13
<b>heart [1]</b> 17/5	<b>highlighted [3]</b> 77/12 155/2 194/11	<b>hook [1]</b> 50/24	<b>I added [1]</b> 89/25	<b>I considered [1]</b> 149/17
<b>held [7]</b> 5/2 53/24 62/6 62/10 69/7 104/7 140/4	<b>highly [1]</b> 77/16	<b>hope [11]</b> 18/10 18/15 21/21 21/22 22/21 23/5 23/6 70/7 82/9 106/25 178/20	<b>I advised [1]</b> 135/23	<b>I contacted [1]</b> 128/20
<b>Helen [21]</b> 178/2 185/12 185/12 185/16 185/17 186/12 186/16 188/2 188/24 189/23 190/9 191/19 191/21 194/1 194/5 194/13 194/17 194/25 196/2 196/4 196/6	<b>him [25]</b> 14/8 14/9 14/16 14/24 15/4 15/22 43/15 86/23 88/8 88/17 89/25 89/25 90/2 91/5 92/7 96/3 107/15 149/22 168/20 171/13 172/20 189/8 189/9 194/8 197/13	<b>hopefully [3]</b> 38/5 53/22 69/5	<b>I agree [3]</b> 79/17 86/22 87/15	<b>I couldn't [2]</b> 10/24 67/24
<b>Helen Rose's [3]</b> 186/12 186/16 188/24	<b>himself [2]</b> 93/4 146/5	<b>Horizon [98]</b> 8/20 12/14 12/21 16/17 25/8 25/13 26/18 27/3 30/14 31/14 31/18 31/22 32/8 32/16 32/20 33/5 33/15 36/1 36/5 36/7 36/8 36/12 37/19 38/1 38/13 38/22 39/11 39/16 39/20 39/22 40/4 40/15 40/21 45/5 45/17 48/7 55/7 62/19 65/16 65/22 72/2 72/4 73/12 80/22 83/1 83/9 83/20 84/7 84/12 87/18 90/21 95/18 96/12 98/6 99/1 99/10 99/19 99/24 100/23 108/24 110/10 125/15 126/12 126/18 127/13 129/10 129/15 129/21 135/25 136/2 136/6 136/21 137/3 137/15 137/18 137/20 138/8 138/13 143/9 143/14 143/20 146/7 149/8 153/19 154/20 154/24 155/23 156/12 157/2 157/19 159/6 174/17 174/24 175/23 176/9 180/25 181/10 186/1	<b>I also [3]</b> 89/16 138/11 196/19	<b>I couldn't [2]</b> 10/24 67/24
<b>Helen's [1]</b> 187/4	<b>hired [2]</b> 9/17 13/11	<b>Horizon's [1]</b> 37/9	<b>I always [1]</b> 96/20	<b>I dare [1]</b> 197/17
<b>help [18]</b> 25/24 26/20 27/18 29/17 31/10 35/1 35/6 79/18 95/2 124/6 128/14 158/21 160/2 163/19 168/21 169/12 169/20 191/7	<b>his [54]</b> 14/23 15/19 16/8 31/4 35/19 40/17 42/7 42/13 43/11 44/20 55/3 55/10 60/22 61/22 61/24 65/13 87/6 87/11 88/24 89/18 89/20 91/4 92/23 93/6 95/7 95/18 96/8 107/9 110/15 120/25 141/11 150/4 150/8 150/10 150/12 151/8 151/16 152/1 152/16 161/25 162/2 162/17 163/8 165/25 166/6 166/14 167/21 171/7 171/20 171/21 172/19 188/8 192/12 192/16	<b>Horizon-FJ [1]</b> 159/6	<b>I am [12]</b> 16/25 46/22 51/21 53/2 53/18 55/4 60/21 90/19 93/25 98/20 158/25 190/1	<b>I definitely [1]</b> 109/13
<b>helpdesks [1]</b> 45/2	<b>historic [9]</b> 5/8 5/21 66/4 142/4 143/6 156/9 156/11 156/21 157/19	<b>Horizon-related [2]</b> 135/25 136/2	<b>I anticipate [1]</b> 160/4	<b>I did [23]</b> 11/16 13/17 19/3 26/20 27/24 67/12 67/24 68/1 68/5 68/23 71/5 71/21 77/14 93/23 98/6 108/1 108/5 110/23 113/2 132/1 134/9 164/19 164/20
<b>helped [3]</b> 26/22 28/21 184/24	<b>hm [6]</b> 41/22 68/10 98/25 155/4 173/22 174/3	<b>hostage [1]</b> 57/14	<b>I apologise [2]</b> 28/5 64/5	<b>I didn't [19]</b> 19/20 62/12 62/12 62/16 71/6 96/14 123/17 131/22 135/5 135/8 141/3 142/17 143/17 149/3 152/2 152/2 152/8 171/3 184/5
<b>helpful [3]</b> 20/2 31/15 180/9	<b>hoc [1]</b> 23/23	<b>hostile [1]</b> 183/23	<b>I apology [1]</b> 153/6	<b>I do [20]</b> 7/5 16/11 23/4 27/11 52/12 67/18 68/5 69/3 71/3 77/15 79/3 82/24 95/14 107/14 119/11 141/19 163/16 166/16 171/11 197/21
<b>helpline [1]</b> 65/21	<b>Hogg [1]</b> 53/15	<b>hour [1]</b> 30/20	<b>I appreciate [5]</b> 27/21 42/3 107/12 110/15 117/17	<b>I don't [172]</b> 5/16 10/3 11/2 11/3 13/25 14/8 14/22 15/3 16/3 16/19 16/23 19/6 20/9 20/11 20/20 20/21 25/19 26/3 28/9 33/10
<b>helps [3]</b> 23/5 100/1 135/8	<b>hold [4]</b> 6/2 62/12 96/25 119/6	<b>house [4]</b> 13/19 14/5 23/22 24/4	<b>I ask [2]</b> 1/10 196/25	
<b>hence [2]</b> 101/3 131/7	<b>holder [2]</b> 140/17 141/4	<b>how [35]</b> 4/20 15/15 18/3 25/7 26/7 27/4 31/13 53/3 80/16 82/25 86/15 92/9 94/25 100/9 106/16	<b>I asked [3]</b> 157/15 163/4 164/9	
<b>her [7]</b> 60/22 63/20 93/10 186/20 186/21 195/11 197/13			<b>I assume [2]</b> 92/1 193/4	
<b>here [36]</b> 8/11 18/8 19/8 21/24 27/20 33/18 71/5 72/19 73/2 77/9 89/22 93/25 97/1 97/19 106/11 110/7 110/11 119/6 124/23 127/2 127/22 134/6 140/18 144/25 149/23 159/25 161/7 165/1 166/25 167/2 171/16 175/25 179/22 188/20 195/7 196/21			<b>I assumed [2]</b> 142/7 142/8	
<b>here's [3]</b> 73/19			<b>I attend [2]</b> 103/7 135/17	
			<b>I be [2]</b> 24/7 125/23	
			<b>I became [7]</b> 9/18 9/25 10/21 11/2 51/8 106/6 148/5	
			<b>I beg [12]</b> 52/12 64/4 97/23 98/20 143/3 146/22 163/17 164/20 173/9 173/15 191/12 194/22	
			<b>I believe [8]</b> 21/23 53/16 107/3 121/7 141/21 178/17 183/20 184/15	
			<b>I call [1]</b> 1/5	

<b>I</b>	154/5	162/19 170/19 183/1	<b>I stress [1]</b> 27/5	150/19 165/5 167/8
<b>I don't... [152]</b> 33/12	<b>I give [1]</b> 132/11	<b>I meant [1]</b> 89/1	<b>I strike [1]</b> 193/19	<b>I wouldn't [10]</b> 14/18
33/18 35/12 39/12	<b>I go [1]</b> 195/14	<b>I mention [1]</b> 67/19	<b>I supported [1]</b> 25/23	15/9 17/3 17/13 17/21
40/8 42/7 42/21 45/11	<b>I guess [5]</b> 26/21	<b>I met [1]</b> 60/15	<b>I suppose [1]</b> 104/14	19/6 106/9 112/18
48/12 48/23 54/4	41/2 57/19 101/22	<b>I might [2]</b> 124/6	<b>I suspect [4]</b> 76/1	141/8 150/17
54/15 54/15 54/17	188/20	161/12	102/24 124/18 149/16	<b>I wrote [3]</b> 40/8 77/13
57/10 63/23 67/7	<b>I had [19]</b> 5/12 13/9	<b>I missed [1]</b> 19/11	<b>I swear [1]</b> 43/16	141/7
67/16 68/6 68/21	13/11 18/15 22/10	<b>I moved [1]</b> 10/10	<b>I take [2]</b> 43/20 78/11	<b>I'd [29]</b> 3/14 33/24
68/22 70/8 70/9 76/3	24/2 121/5 131/18	<b>I need [1]</b> 18/16	<b>I then [1]</b> 193/15	35/13 38/25 44/15
77/3 77/6 77/23 87/11	132/16 139/11 140/17	<b>I needed [1]</b> 115/9	<b>I think [258]</b>	48/18 54/15 70/24
88/3 89/6 92/20 95/23	141/4 141/6 142/21	<b>I now [1]</b> 84/11	<b>I thought [12]</b> 5/16	71/5 77/3 77/4 77/16
96/2 103/7 103/7	147/22 184/5 187/17	<b>I observed [1]</b> 15/13	12/6 21/21 21/22	89/16 91/10 92/5 96/5
104/5 104/10 104/22	190/14 190/17	<b>I offer [1]</b> 70/25	48/18 96/5 98/20	96/20 98/20 110/2
105/1 105/9 105/14	<b>I have [47]</b> 2/9 5/19	<b>I offered [1]</b> 195/4	110/18 164/18 164/20	117/9 164/18 166/7
105/15 106/5 106/14	5/22 5/24 7/12 19/3	<b>I only [4]</b> 36/23 59/5	183/12 188/3	178/4 179/2 181/24
112/15 117/7 118/10	20/20 22/2 29/7 33/19	81/23 126/17	<b>I totally [1]</b> 143/25	184/5 191/25 194/22
118/19 119/2 119/5	41/8 41/17 52/9 52/12	<b>I probably [2]</b> 63/1	<b>I tried [2]</b> 22/10 89/19	196/5
119/16 119/22 119/25	55/8 55/24 67/12	195/8	<b>I turn [1]</b> 125/13	<b>I'll [17]</b> 16/1 30/16
120/10 123/22 124/2	69/15 70/15 72/22	<b>I propose [1]</b> 197/15	<b>I understand [5]</b> 16/2	49/20 58/6 67/20 87/8
124/13 125/6 125/11	76/11 81/25 82/21	<b>I put [1]</b> 141/1	27/9 117/10 181/10	87/9 109/12 114/20
128/17 128/23 129/2	84/9 84/18 84/20	<b>I read [2]</b> 39/23	186/18	145/21 158/1 173/10
129/7 129/9 129/12	84/22 84/23 85/6	149/14	<b>I understood [3]</b>	179/18 183/1 185/9
129/16 130/3 130/8	85/21 87/2 87/4 94/18	<b>I really [2]</b> 95/1	79/13 177/20 196/12	197/1 197/22
131/14 131/16 133/10	98/23 101/14 104/5	151/10	<b>I urge [1]</b> 90/18	<b>I'm [239]</b>
134/23 138/23 139/22	106/18 130/17 132/15	<b>I recall [8]</b> 50/12	<b>I used [4]</b> 34/8 34/12	<b>I've [30]</b> 4/1 19/5 20/2
140/10 140/12 140/14	141/1 143/11 146/24	82/25 89/15 112/16	34/19 69/12	28/9 31/5 33/18 43/16
140/16 140/16 140/17	154/9 157/11 158/19	115/18 151/18 179/16	<b>I want [5]</b> 50/19 56/9	46/8 48/12 48/13 49/3
140/18 140/19 140/22	173/15 192/1	182/10	75/1 86/3 157/14	51/17 63/15 70/4
141/4 141/8 143/22	<b>I haven't [8]</b> 26/13	<b>I referred [1]</b> 110/6	<b>I wanted [5]</b> 154/15	77/11 77/12 80/21
143/23 144/16 144/20	27/12 47/13 81/24	<b>I remember [5]</b> 77/23	156/6 184/13 188/11	89/11 89/24 106/11
144/22 145/1 145/5	110/3 122/12 148/7	77/24 117/18 128/17	188/14	114/3 119/20 141/17
145/9 145/16 145/18	152/2	166/17	<b>I was [41]</b> 9/16 9/16	142/14 143/11 158/25
145/25 145/25 146/8	<b>I helped [2]</b> 26/22	<b>I replaced [1]</b> 193/20	23/20 26/10 33/7	161/3 175/25 180/4
146/11 148/20 149/5	28/21	<b>I reported [3]</b> 9/25	34/19 37/21 40/16	182/25
149/21 151/2 151/23	<b>I hope [6]</b> 21/21	10/1 10/7	54/16 62/9 62/22	<b>idea [2]</b> 69/10 132/16
152/11 152/17 154/13	21/22 23/5 23/6	<b>I requested [1]</b> 121/7	67/13 71/4 82/25	<b>identified [9]</b> 3/14
157/9 158/6 159/10	106/25 178/20	<b>I said [5]</b> 18/23 76/9	83/16 97/8 97/12 98/8	22/4 29/1 56/11 69/25
160/6 162/9 162/10	<b>I imagine [3]</b> 45/10	107/23 183/4 190/12	100/12 103/12 104/9	101/22 116/13 136/6
162/19 163/3 163/3	124/1 160/11	<b>I saw [8]</b> 26/3 45/12	108/11 109/10 111/22	192/21
163/11 163/14 164/24	<b>I indicated [1]</b> 89/15	92/23 97/15 128/22	111/25 125/6 128/18	<b>identify [5]</b> 20/9
164/24 165/16 166/7	<b>I introduced [1]</b>	142/6 149/20 191/1	128/19 132/17 141/1	20/17 22/8 73/14 95/8
167/6 168/19 168/19	194/2	<b>I say [19]</b> 16/3 23/6	148/17 162/20 163/19	<b>identifying [1]</b>
169/13 169/16 169/16	<b>I joined [1]</b> 13/8	57/10 67/11 67/16	182/13 183/3 183/11	180/10
170/5 171/9 171/24	<b>I just [11]</b> 27/22	68/21 69/16 70/9 71/3	183/16 184/22 187/17	<b>ie [18]</b> 12/20 36/8
172/13 172/20 173/4	28/14 57/21 63/23	77/14 78/6 93/17	188/7 193/14	36/11 37/14 43/5 69/2
173/6 175/4 175/17	64/4 80/18 98/3 98/11	104/10 110/12 124/22	<b>I wasn't [11]</b> 11/12	73/19 73/23 88/19
178/11 179/1 179/4	131/23 140/22 151/11	125/11 125/22 184/14	13/13 14/22 25/9	89/11 95/4 99/7 125/4
179/9 182/7 184/22	<b>I keep [1]</b> 36/24	195/2	26/11 35/3 100/14	132/24 158/14 162/15
187/6 188/7 193/3	<b>I know [7]</b> 39/10	<b>I see [2]</b> 123/24	112/13 148/7 149/21	168/21 186/24
193/6 193/10 194/19	47/18 56/8 87/3 117/9	124/1	187/16	<b>ie a non-retribution</b>
195/22 195/22 196/21	188/9 197/19	<b>I seem [3]</b> 89/18	<b>I will [3]</b> 22/2 65/14	<b>[1]</b> 99/7
<b>I ever [1]</b> 131/17	<b>I like [1]</b> 43/8	183/18 184/22	111/15	<b>ie avoid [1]</b> 88/19
<b>I fear [1]</b> 161/12	<b>I look [1]</b> 102/24	<b>I sent [1]</b> 50/22	<b>I wonder [2]</b> 31/10	<b>ie bat [1]</b> 89/11
<b>I feel [1]</b> 16/22	<b>I looked [2]</b> 67/25	<b>I set [1]</b> 137/1	103/1	<b>ie he [1]</b> 162/15
<b>I felt [1]</b> 115/9	70/24	<b>I should [5]</b> 64/14	<b>I worked [1]</b> 147/2	<b>ie it [1]</b> 36/11
<b>I find [1]</b> 69/17	<b>I looking [1]</b> 194/11	84/5 97/24 142/8	<b>I would [33]</b> 8/7 8/10	<b>ie put [1]</b> 43/5
<b>I formed [1]</b> 109/23	<b>I made [1]</b> 193/15	149/17	8/23 11/22 13/2 18/6	<b>ie that [1]</b> 95/4
<b>I forwarded [1]</b> 2/3	<b>I managed [1]</b> 104/6	<b>I sincerely [1]</b> 82/9	18/9 18/9 18/15 23/2	<b>ie the [2]</b> 73/23 125/4
<b>I gained [1]</b> 51/6	<b>I may [8]</b> 13/6 19/23	<b>I smell [2]</b> 47/20	23/25 25/4 27/13 28/6	<b>ie whether [1]</b> 186/24
<b>I generally [1]</b> 7/15	80/19 114/21 140/16	48/16	34/1 61/4 61/15 62/1	<b>if [190]</b> 1/20 5/14 7/6
<b>I genuinely [1]</b>	163/14 166/17 173/24	<b>I sort [1]</b> 23/4	70/7 77/22 77/25	7/11 7/16 15/4 15/8
166/22	<b>I mean [11]</b> 5/14 22/2	<b>I specifically [1]</b>	109/21 109/22 111/4	16/18 16/23 22/2
<b>I get [3]</b> 36/18 125/22	54/4 78/13 92/21	12/15	116/1 132/8 148/19	23/22 24/23 26/1 26/6
	124/3 132/11 148/19	<b>I start [1]</b> 23/12	149/11 149/11 150/18	26/9 27/1 27/21 28/5



<b>I</b>	<b>immature [1]</b> 38/24	136/19	<b>initial [7]</b> 105/13	193/6
<b>if... [172]</b> 28/7 28/23	<b>immediate [2]</b> 30/20	<b>incompetence [1]</b>	106/1 106/2 107/19	<b>interested [3]</b> 25/16
29/10 29/17 29/22	123/4	90/20	116/6 117/14 118/6	103/4 179/11
30/4 30/6 30/17 30/21	<b>immediately [1]</b> 33/7	<b>inconsistent [3]</b>	<b>initially [2]</b> 9/25 59/9	<b>interesting [1]</b>
31/4 31/7 31/10 32/10	<b>immunity [4]</b> 99/1	69/16 70/15 106/14	<b>innocently [1]</b> 123/2	108/18
32/17 33/15 33/15	99/6 189/17 189/18	<b>increases [1]</b> 156/4	<b>input [2]</b> 12/1 35/14	<b>interests [1]</b> 118/16
36/6 36/8 36/14 36/21	<b>impact [12]</b> 73/14	<b>incredible [1]</b> 53/16	<b>inquiry [26]</b> 1/11 1/14	<b>interim [19]</b> 52/21
38/12 38/20 38/21	132/16 134/1 134/3	<b>indeed [8]</b> 51/14 65/9	5/9 5/12 5/16 14/12	83/4 87/22 97/9 97/18
41/3 41/10 41/20 42/4	142/3 142/9 142/20	66/19 68/1 108/13	15/16 18/18 18/20	102/6 107/24 111/9
43/15 44/18 45/22	149/1 149/9 153/15	127/21 128/1 151/13	26/21 64/17 67/20	111/13 111/14 125/13
45/25 46/21 47/2 47/7	176/12 177/20	<b>indefensible [1]</b>	82/3 88/16 92/10 99/8	125/21 126/3 128/7
47/8 49/1 49/22 50/1	<b>impacted [1]</b> 149/20	57/23	99/18 120/22 126/12	128/10 131/11 135/10
50/16 51/1 51/21	<b>impartial [2]</b> 50/25	<b>independent [2]</b>	132/3 132/5 141/15	153/15 155/13
52/16 54/25 55/2	51/24	55/12 154/19	153/5 154/20 173/3	<b>intermittent [2]</b> 84/12
55/25 56/3 56/4 56/13	<b>impartiality [4]</b> 61/17	<b>indicate [1]</b> 170/22	179/15	90/22
60/11 61/2 61/2 62/3	62/7 62/10 184/10	<b>indicated [3]</b> 89/15	<b>Inquiry's [1]</b> 22/16	<b>internal [4]</b> 25/23
63/16 63/17 63/19	<b>impartially [1]</b> 184/9	127/13 179/8	<b>insert [6]</b> 2/14 2/18	94/13 141/5 141/7
64/5 65/8 66/11 66/14	<b>imperative [2]</b> 151/5	<b>indicates [1]</b> 2/10	2/25 3/6 3/11 3/16	<b>internally [2]</b> 35/2
67/4 69/12 71/14 74/6	155/24	<b>indicating [1]</b> 126/17	<b>inserted [1]</b> 95/11	88/16
74/18 78/11 78/13	<b>implemented [1]</b>	<b>indications [1]</b> 83/16	<b>Inside [2]</b> 46/20	<b>interpretation [2]</b>
78/15 82/4 83/24	32/1	<b>indicative [1]</b> 152/6	46/24	48/25 104/18
83/25 86/5 87/8 88/11	<b>implication [2]</b> 146/6	<b>indirectly [1]</b> 96/11	<b>insight [2]</b> 18/4 24/20	<b>interpretations [1]</b>
90/5 90/11 91/1 92/8	164/3	<b>individual [12]</b> 32/14	<b>instance [5]</b> 16/6	57/12
93/23 94/4 94/7 94/13	<b>implications [3]</b>	40/11 92/18 97/5	17/24 86/20 120/13	<b>interpreted [2]</b> 7/20
94/20 94/21 95/7	143/6 186/20 188/5	99/11 99/21 100/14	122/6	7/25
95/12 95/12 99/3	<b>implicitly [4]</b> 38/14	101/7 107/22 176/10	<b>instances [1]</b> 101/22	<b>interrogated [1]</b>
99/17 99/18 100/15	39/11 39/23 45/13	176/19 185/20	<b>instead [13]</b> 2/14	110/8
100/25 101/16 101/18	<b>import [1]</b> 127/9	<b>individual's [1]</b> 34/2	2/25 4/8 14/19 39/5	<b>interrupting [1]</b>
102/8 102/9 103/1	<b>importance [2]</b> 72/23	<b>individualised [1]</b>	46/20 50/24 54/7	27/23
103/24 104/2 114/8	109/15	34/18	54/12 79/8 79/24	<b>intervention [2]</b>
114/9 114/21 115/14	<b>important [17]</b> 17/14	<b>individuals [2]</b> 17/15	87/12 126/14	24/23 99/24
121/11 121/15 122/1	17/19 21/23 22/24	133/6	<b>instigating [1]</b>	<b>interview [5]</b> 46/23
122/1 122/25 125/24	24/19 68/8 72/5	<b>Industry [1]</b> 84/24	137/14	59/10 59/10 65/13
125/25 126/8 126/9	119/13 132/5 133/20	<b>inevitable [2]</b> 42/21	<b>instruct [8]</b> 164/8	65/16
128/20 128/21 130/12	137/10 150/23 151/1	85/14	164/23 165/9 165/15	<b>interviewed [1]</b> 53/9
132/11 132/13 132/20	166/24 183/12 185/3	<b>inference [1]</b> 163/22	170/9 170/12 170/25	<b>interviewee [1]</b> 50/4
133/1 134/13 135/4	191/24	<b>info [3]</b> 159/21 163/1	172/18	<b>intimated [1]</b> 183/19
135/8 135/13 135/15	<b>importantly [1]</b> 85/3	190/9	<b>instructed [4]</b> 77/20	<b>into [36]</b> 12/2 12/11
140/23 143/5 145/19	<b>impossible [1]</b> 34/1	<b>information [70]</b> 7/10	100/22 151/16 173/2	12/17 17/9 18/5 18/16
146/21 147/8 149/8	<b>impossibly [1]</b> 39/24	7/12 7/22 30/15 38/15	<b>instruction [4]</b> 105/9	24/20 28/5 31/13
150/18 158/17 159/8	<b>impression [7]</b> 15/4	38/23 39/25 41/1 41/2	106/5 112/13 148/16	35/15 36/23 37/6
159/22 162/14 163/12	19/7 20/5 100/16	52/24 77/19 83/17	<b>instructions [11]</b>	37/18 42/9 44/22
166/18 166/21 167/3	134/9 147/22 182/16	86/14 86/23 88/11	25/10 26/10 64/9	56/19 61/24 78/1
167/6 167/14 169/16	<b>improve [1]</b> 153/19	88/20 91/16 92/11	68/25 105/5 105/17	83/14 90/9 98/6
170/12 170/16 170/22	<b>inadequate [3]</b> 99/23	93/5 94/6 94/16 95/16	105/25 145/6 151/24	101/25 117/4 120/3
173/25 174/10 174/11	99/23 107/16	105/10 106/15 117/24	164/12 190/5	123/19 124/8 134/1
174/15 177/12 178/6	<b>inadvertent [1]</b> 19/22	118/4 121/9 122/4	<b>instructs [1]</b> 176/6	136/1 139/4 145/3
178/21 179/1 179/22	<b>inadvertently [3]</b>	122/10 122/18 122/22	<b>Int [1]</b> 160/24	145/18 148/1 154/20
179/23 179/24 180/19	19/15 20/18 123/1	122/23 122/24 122/25	<b>integral [1]</b> 155/23	174/25 177/13 182/18
181/21 185/2 187/4	<b>inbound [2]</b> 88/24	123/5 123/11 123/15	<b>integrity [3]</b> 126/11	<b>intricacies [1]</b> 194/21
188/15 189/25 190/2	107/4	123/20 124/9 125/10	143/21 146/4	<b>introduced [3]</b> 24/2
191/13 192/1 192/3	<b>inbox [1]</b> 68/1	128/8 130/6 130/25	<b>intend [2]</b> 27/13 39/5	174/19 194/2
192/6 193/22 194/6	<b>incident [1]</b> 181/11	131/4 131/5 131/8	<b>intended [3]</b> 22/19	<b>introspection [1]</b>
194/14 196/21 197/10	<b>incidentally [1]</b>	132/12 132/18 132/19	43/23 173/19	165/1
197/18	170/23	132/24 133/19 134/20	<b>intending [1]</b> 48/14	<b>inverted [1]</b> 13/18
<b>ignore [2]</b> 65/23	<b>inclined [2]</b> 50/20	136/5 138/20 139/7	<b>intent [1]</b> 20/8	<b>investigate [5]</b> 91/23
85/25	91/3	139/18 145/6 145/10	<b>intention [1]</b> 140/23	108/8 144/19 144/25
<b>ii [1]</b> 180/11	<b>include [3]</b> 132/2	145/22 146/13 146/13	<b>interact [1]</b> 100/10	148/10
<b>iii [1]</b> 191/13	194/6 194/14	163/6 166/15 172/5	<b>interaction [3]</b> 14/24	<b>investigated [3]</b>
<b>image [1]</b> 25/6	<b>included [1]</b> 186/14	178/13 180/5 185/25	14/25 15/11	107/3 147/10 177/6
<b>images [1]</b> 120/17	<b>includes [1]</b> 78/10	186/22 190/6 195/9	<b>intercepted [1]</b> 123/2	<b>investigates [1]</b>
<b>imagine [3]</b> 45/10	<b>including [9]</b> 29/23	<b>informed [6]</b> 61/19	<b>interest [8]</b> 51/9	184/19
124/1 160/11	50/4 51/14 56/1 58/19	86/14 116/3 127/11	51/13 58/18 160/1	<b>investigating [2]</b>
	64/23 124/16 127/17	128/15 130/1	160/3 189/18 189/20	97/3 97/4

<b>I</b>	14/20 23/9 26/24 30/9 47/4 48/6 65/15 65/22 65/23 72/2 80/22 81/25 91/12 92/25 100/23 101/7 101/23 101/25 103/22 108/8 110/19 111/18 111/21 112/9 126/18 136/1 136/6 136/21 137/3 137/11 137/15 137/18 137/20 138/8 138/13 149/23 153/14 153/22 155/15 159/13 171/16 176/10 182/17 182/23 187/8 187/24 191/14	193/1 193/2 193/2 193/4 193/23 194/3 194/22 195/17 195/18 196/10 196/21 197/15	<b>joining [4]</b> 6/24 7/2 24/3 100/8 <b>joke [1]</b> 43/24 <b>journalism [1]</b> 61/24 <b>journalist [1]</b> 29/11 <b>journalists [1]</b> 24/20 <b>journos [1]</b> 53/2 <b>JR [2]</b> 85/22 87/4 <b>judge [7]</b> 20/11 73/19 110/9 110/10 142/22 189/19 190/3 <b>judgement [1]</b> 20/14 <b>judging [1]</b> 20/12 <b>judgment [15]</b> 73/13 73/20 80/23 107/10 108/13 108/14 108/19 108/20 108/22 109/11 109/19 110/3 110/11 110/24 114/18 <b>judicial [2]</b> 85/14 117/21 <b>July [32]</b> 52/15 82/21 90/6 91/18 92/1 97/18 97/19 108/3 108/5 111/7 123/25 124/5 125/14 125/19 125/25 126/6 135/17 135/21 136/18 136/23 141/12 141/17 141/19 149/13 154/22 158/15 165/4 176/7 176/13 178/10 186/7 186/10 <b>July '13 [1]</b> 176/13 <b>July 2013 [3]</b> 82/21 97/18 186/7 <b>jump [1]</b> 138/23 <b>jumping [2]</b> 182/2 182/3 <b>June [3]</b> 11/10 127/6 180/11 <b>jurisdiction [1]</b> 63/8 <b>just [83]</b> 16/6 21/5 27/8 27/20 27/22 28/14 30/19 32/12 33/3 33/10 33/16 38/16 41/12 44/11 46/21 47/2 49/22 51/18 52/17 52/21 54/25 57/11 57/21 60/6 60/11 63/17 63/23 64/4 71/24 74/6 80/18 80/21 83/24 88/21 89/4 90/10 93/5 97/1 97/24 97/25 98/3 98/11 99/13 100/6 101/19 102/9 106/16 107/12 110/16 110/17 110/22 116/10 118/20 119/8 119/20 121/20 131/23 140/22 146/19 151/11 152/19 158/21 158/25 159/23 163/14 173/25 177/12 179/18 181/21 182/15 182/18	182/21 182/25 183/2 185/2 189/4 190/12 190/13 193/25 194/3 194/8 197/9 197/16 <b>justice [4]</b> 151/11 160/21 184/20 188/12	
<b>investigation [18]</b> 52/25 64/10 64/22 65/9 69/25 89/14 90/9 97/9 100/5 100/10 105/13 116/6 145/2 157/4 167/2 179/14 184/9 186/20	<b>Issy [1]</b> 53/15 <b>it [652]</b> <b>it' [1]</b> 169/10 <b>it's [159]</b> 1/16 1/17 1/18 3/8 3/13 8/18 8/25 9/7 9/7 9/21 11/16 15/7 15/12 15/13 15/25 16/20 16/21 16/23 19/11 20/12 20/12 20/16 21/23 22/24 22/24 25/13 27/20 29/6 30/19 32/8 32/16 33/2 33/2 33/9 33/10 34/1 34/3 35/6 36/15 37/12 37/23 39/6 39/12 41/24 43/6 48/2 49/4 49/22 51/7 51/17 57/4 57/13 59/7 63/20 64/1 64/2 67/10 67/20 68/20 69/9 70/7 71/2 72/24 77/9 77/16 78/12 80/5 80/13 80/15 81/22 82/1 83/25 84/1 89/6 89/22 89/23 92/13 98/22 101/1 101/1 103/2 105/4 106/16 106/16 109/21 109/22 110/20 110/23 112/25 113/13 114/3 114/8 116/1 117/7 118/21 119/18 120/17 120/17 121/20 122/3 122/13 123/25 125/14 125/25 126/10 131/6 134/13 136/18 138/23 140/17 142/17 143/3 143/22 143/23 144/9 144/17 152/18 154/12 154/14 154/15 154/16 157/14 158/11 161/13 162/9 162/9 162/14 163/11 163/17 166/25 168/16 168/22 169/3 169/6 169/24 171/11 174/4 174/18 178/21 178/25 179/23 183/22 183/25 185/3 185/24 188/3 191/16	<b>investigations [12]</b> 56/19 66/3 66/17 104/21 116/9 155/1 157/9 157/9 176/25 179/17 180/12 183/6 <b>Investigator [1]</b> 121/2 <b>investigators [1]</b> 125/4 <b>invitation [1]</b> 68/22 <b>invite [1]</b> 46/22 <b>invited [6]</b> 89/17 140/8 140/24 141/15 157/12 178/15 <b>inviting [2]</b> 89/25 93/8 <b>involved [14]</b> 23/3 53/11 61/19 61/21 78/9 98/8 103/9 103/9 106/2 107/22 111/1 129/19 195/4 195/6 <b>involvement [5]</b> 24/11 61/9 61/14 98/12 101/5 <b>involving [1]</b> 188/22 <b>irrelevant [2]</b> 170/6 170/7 <b>is [375]</b> <b>Ishaq [1]</b> 186/7 <b>Ishaq's [2]</b> 186/9 186/23 <b>isn't [11]</b> 15/12 20/16 38/10 39/17 70/23 78/17 119/20 142/10 157/20 183/22 188/9 <b>isolated [1]</b> 143/24 <b>issue [52]</b> 47/18 61/19 62/5 69/4 77/17 88/9 88/15 93/1 93/6 94/11 101/25 102/1 102/19 107/11 109/12 113/25 116/2 116/10 117/18 122/3 124/3 129/10 133/1 134/14 147/4 148/22 150/23 151/1 151/2 162/22 163/1 163/2 164/22 165/7 165/13 168/16 168/22 170/15 172/15 172/16 177/20 180/24 181/3 181/25 182/5 184/12 185/20 185/22 187/21 188/5 196/13 196/15 <b>issues [49]</b> 6/5 7/12	<b>James [3]</b> 58/15 60/15 174/24 <b>Jane [1]</b> 46/16 <b>January [4]</b> 46/18 46/25 47/12 65/5 <b>January 2016 [1]</b> 65/5 <b>Jarnail [3]</b> 13/10 127/18 128/22 <b>Jason [1]</b> 1/10 <b>Jenkins [49]</b> 141/21 141/25 142/3 144/18 145/3 145/17 145/22 146/3 146/5 150/4 150/7 150/9 150/22 151/6 151/15 151/25 152/15 156/17 156/20 157/1 157/18 161/16 161/17 161/21 162/14 162/15 162/18 163/7 164/8 164/13 164/23 165/10 165/15 166/2 166/2 166/5 167/5 167/17 168/8 168/9 170/9 170/12 170/25 172/15 172/17 172/18 173/1 177/17 177/20 <b>Jenkins' [3]</b> 133/1 142/12 148/14 <b>Jessica [1]</b> 10/5 <b>JFSA [7]</b> 47/20 48/15 85/5 85/9 99/2 99/11 99/25 <b>job [2]</b> 9/15 184/17 <b>John [2]</b> 2/3 120/23 <b>joined [9]</b> 4/11 9/13 10/14 10/25 11/2 13/8 14/2 28/16 115/4	<b>journalism [1]</b> 61/24 <b>journalist [1]</b> 29/11 <b>journalists [1]</b> 24/20 <b>journos [1]</b> 53/2 <b>JR [2]</b> 85/22 87/4 <b>judge [7]</b> 20/11 73/19 110/9 110/10 142/22 189/19 190/3 <b>judgement [1]</b> 20/14 <b>judging [1]</b> 20/12 <b>judgment [15]</b> 73/13 73/20 80/23 107/10 108/13 108/14 108/19 108/20 108/22 109/11 109/19 110/3 110/11 110/24 114/18 <b>judicial [2]</b> 85/14 117/21 <b>July [32]</b> 52/15 82/21 90/6 91/18 92/1 97/18 97/19 108/3 108/5 111/7 123/25 124/5 125/14 125/19 125/25 126/6 135/17 135/21 136/18 136/23 141/12 141/17 141/19 149/13 154/22 158/15 165/4 176/7 176/13 178/10 186/7 186/10 <b>July '13 [1]</b> 176/13 <b>July 2013 [3]</b> 82/21 97/18 186/7 <b>jump [1]</b> 138/23 <b>jumping [2]</b> 182/2 182/3 <b>June [3]</b> 11/10 127/6 180/11 <b>jurisdiction [1]</b> 63/8 <b>just [83]</b> 16/6 21/5 27/8 27/20 27/22 28/14 30/19 32/12 33/3 33/10 33/16 38/16 41/12 44/11 46/21 47/2 49/22 51/18 52/17 52/21 54/25 57/11 57/21 60/6 60/11 63/17 63/23 64/4 71/24 74/6 80/18 80/21 83/24 88/21 89/4 90/10 93/5 97/1 97/24 97/25 98/3 98/11 99/13 100/6 101/19 102/9 106/16 107/12 110/16 110/17 110/22 116/10 118/20 119/8 119/20 121/20 131/23 140/22 146/19 151/11 152/19 158/21 158/25 159/23 163/14 173/25 177/12 179/18 181/21 182/15 182/18	<b>justice [4]</b> 151/11 160/21 184/20 188/12
<b>K</b>			<b>Kay [1]</b> 86/25 <b>KC [2]</b> 158/17 172/14 <b>keen [3]</b> 85/22 116/2 138/12 <b>keep [14]</b> 36/24 48/23 56/4 74/11 159/16 179/23 181/19 185/4 186/10 191/18 191/21 194/25 196/1 196/4 <b>keeping [2]</b> 128/4 185/1 <b>keeps [1]</b> 87/11 <b>KEL [1]</b> 72/12 <b>KELs [18]</b> 73/7 73/9 73/11 73/16 73/22 73/23 74/3 74/4 74/17 75/7 76/12 76/19 77/17 78/24 79/6 81/10 81/11 114/19 <b>key [10]</b> 61/1 66/10 72/11 73/2 73/23 76/20 174/22 190/18 194/5 194/13 <b>kind [6]</b> 45/7 62/18 70/14 134/20 148/15 148/16 <b>King [13]</b> 2/4 120/24 121/6 127/7 137/7 137/12 151/19 158/17 161/10 178/11 178/14 190/15 196/9 <b>King's [1]</b> 141/20 <b>Kingdom [1]</b> 6/15 <b>knew [13]</b> 58/1 131/24 133/7 133/22 134/11 134/23 147/19 148/11 170/19 175/6 175/11 183/6 184/17 <b>knocks [1]</b> 89/4 <b>know [147]</b> 1/9 11/2 11/4 12/16 16/4 17/5 17/6 25/19 26/7 31/15 36/25 39/10 39/10 39/12 40/8 42/7 45/11 47/18 54/15 56/8 57/10 57/19 59/5 60/17 61/21 62/21 66/12 69/11 87/3 88/3 88/9 89/6 89/20 92/20 94/25 95/24 96/3 96/17 97/13 101/2 105/2 106/14 109/13 112/4 112/15 112/17 117/9 117/20 118/11 118/15 118/15 119/11		

<b>K</b>	<b>last [16]</b> 1/20 31/12 38/10 50/22 53/9 60/6 84/8 84/9 84/10 93/21 126/8 135/13 156/12 167/23 169/2 197/11	<b>left-hand [1]</b> 165/21	<b>liability [2]</b> 108/23 110/4	106/10 108/17 115/25 116/11 116/15 116/17 116/20 118/24 118/24 127/19 149/7 183/9 189/6	
<b>know... [95]</b> 123/22 124/2 124/21 125/6 125/8 125/12 125/14 125/19 127/19 127/25 128/17 131/7 131/15 132/25 133/9 133/12 133/17 134/8 134/10 135/2 135/4 139/23 140/16 140/17 141/3 141/5 141/6 142/17 142/18 144/20 145/16 145/18 145/21 145/25 145/25 146/11 146/13 148/13 149/21 151/2 152/8 152/9 152/11 155/13 159/10 160/7 162/9 163/3 163/11 163/14 163/17 164/7 164/24 165/16 166/7 166/21 167/6 168/2 168/17 168/19 168/19 169/13 169/16 169/16 170/5 171/3 171/9 171/24 172/13 173/4 175/4 175/14 175/17 178/19 178/21 179/4 179/9 182/7 183/17 183/18 184/5 184/25 185/3 188/7 188/9 188/11 190/17 193/3 193/6 193/10 195/22 195/22 196/21 197/16 197/19	<b>lasted [1]</b> 23/2	<b>legal [76]</b> 3/6 4/15 4/17 4/18 4/20 4/24 7/12 8/1 8/6 8/8 8/12 8/19 8/22 8/24 9/18 9/23 10/1 10/1 10/6 10/7 11/25 13/16 16/13 17/9 17/11 17/20 17/21 17/23 18/1 18/3 23/22 23/22 23/24 24/1 24/4 24/9 24/23 25/24 47/18 63/3 71/24 73/2 74/2 74/15 77/3 77/7 77/8 77/10 78/6 78/18 94/9 109/7 109/16 111/3 115/21 116/12 118/2 118/25 120/6 121/12 121/13 121/14 121/16 152/14 169/7 169/8 170/14 171/1 186/19 186/19 187/20 187/23 188/4 188/5 188/6 190/10	<b>like [60]</b> 7/22 26/1 26/3 28/6 28/7 32/10 32/18 32/22 33/15 34/25 36/19 38/21 42/20 42/21 43/8 44/11 45/21 48/2 49/13 53/17 61/4 66/14 66/18 67/22 69/1 69/9 70/24 71/5 71/17 77/3 77/4 77/15 77/21 91/10 92/5 92/22 93/9 96/20 105/3 106/5 112/21 115/16 116/21 117/9 118/24 120/13 121/22 132/15 148/20 158/13 164/10 165/18 178/4 178/16 178/24 179/2 181/24 193/20 193/21 194/16	<b>litigator [1]</b> 6/24	
<b>knowing [1]</b> 134/19	<b>later [15]</b> 28/16 44/9 44/10 50/2 57/25 61/3 64/19 65/24 72/1 84/3 108/21 126/6 135/19 168/13 195/2	<b>legally [8]</b> 63/5 115/10 122/18 122/21 122/25 123/10 125/9 186/17	<b>likelihood [1]</b> 94/24	<b>litigious [2]</b> 104/24 105/20	
<b>knowledge [26]</b> 3/23 12/11 12/13 12/13 12/17 78/3 78/5 83/6 87/19 115/6 126/18 130/15 131/18 133/5 146/10 146/25 147/10 165/14 171/22 172/7 172/8 172/10 172/12 172/22 172/25 175/1	<b>latest [1]</b> 30/24	<b>legitimate [7]</b> 58/18 66/9 67/2 67/6 68/15 70/5 70/14	<b>limit [1]</b> 92/8	<b>live [5]</b> 36/20 59/10 149/22 196/13 196/15	
<b>known [21]</b> 13/13 72/3 72/5 75/4 75/13 78/3 78/4 87/6 127/20 127/21 127/25 128/2 128/22 132/1 134/14 134/17 137/16 141/8 156/9 158/4 159/13	<b>launch [1]</b> 174/22	<b>length [3]</b> 118/12 119/12 126/13	<b>limited [8]</b> 7/21 8/1 84/23 88/16 127/12 127/20 167/1 189/13	<b>lived [1]</b> 37/4	
<b>L</b>	<b>law [22]</b> 13/1 13/15 13/24 14/3 14/7 15/24 16/7 22/20 75/19 77/21 118/3 120/3 130/1 133/3 137/8 137/8 140/2 163/13 166/4 174/8 177/4 189/9	<b>lent [1]</b> 51/16	<b>line [19]</b> 2/8 2/22 3/4 3/8 30/13 56/10 57/12 69/2 71/2 91/17 132/3 132/5 138/6 144/8 144/9 144/11 144/11 144/17 162/24	<b>lives [1]</b> 85/10	
<b>lack [1]</b> 16/7	<b>lawyer [20]</b> 3/10 9/17 13/2 13/9 13/14 13/19 13/22 14/5 16/4 24/4 33/11 112/16 121/19 121/21 149/6 166/9 166/10 166/10 167/8 167/9	<b>Lepton [1]</b> 185/18	<b>Limited's [1]</b> 102/23	<b>living [1]</b> 42/25	
<b>lacking [1]</b> 184/10	<b>lawyered [1]</b> 105/21	<b>Lesley [2]</b> 153/10 153/12	<b>line [19]</b> 2/8 2/22 3/4 3/8 30/13 56/10 57/12 69/2 71/2 91/17 132/3 132/5 138/6 144/8 144/9 144/11 144/11 144/17 162/24	<b>local [2]</b> 126/25 130/15	
<b>land [2]</b> 30/12 60/19	<b>lawyers [25]</b> 24/11 51/7 53/19 54/7 54/12 66/23 67/14 68/13 78/9 78/10 79/21 81/12 83/7 104/1 106/1 119/3 134/2 137/8 137/8 138/12 141/23 142/7 150/24 151/14 171/5	<b>less [5]</b> 28/15 97/14 138/19 154/2 185/15	<b>lines [11]</b> 3/4 45/11 49/14 88/16 92/10 95/10 102/4 115/8 115/17 141/18 179/14	<b>locate [1]</b> 180/15	
<b>landed [1]</b> 61/1	<b>leader [1]</b> 179/24	<b>let [5]</b> 58/2 66/11 105/22 117/7 156/10	<b>limit [1]</b> 92/8	<b>location [1]</b> 136/2	
<b>landed [1]</b> 61/1	<b>leadership [1]</b> 62/19	<b>let's [19]</b> 13/20 20/4 20/25 21/2 21/5 22/15 28/11 35/17 38/17 42/16 76/10 79/24 147/18 147/20 147/23 148/10 148/11 148/13 165/17	<b>limited [8]</b> 7/21 8/1 84/23 88/16 127/12 127/20 167/1 189/13	<b>locking [1]</b> 129/10	
<b>language [1]</b> 103/20	<b>leads [1]</b> 100/25	<b>letter [24]</b> 61/14 62/1 81/12 87/5 89/15 89/24 114/2 114/5 114/9 114/12 114/13 114/13 147/5 153/13 154/1 154/10 154/12 154/13 154/13 154/16 154/16 157/5 172/3 186/8	<b>line [19]</b> 2/8 2/22 3/4 3/8 30/13 56/10 57/12 69/2 71/2 91/17 132/3 132/5 138/6 144/8 144/9 144/11 144/11 144/17 162/24	<b>log [4]</b> 40/24 45/21 180/18 181/1	
<b>large [3]</b> 21/18 69/9 120/13	<b>learned [1]</b> 50/21	<b>letters [3]</b> 87/2 89/16 171/25	<b>lines [11]</b> 3/4 45/11 49/14 88/16 92/10 95/10 102/4 115/8 115/17 141/18 179/14	<b>log' [3]</b> 180/17 181/10 181/12	
<b>largely [2]</b> 4/4 117/18	<b>least [5]</b> 37/16 55/2 142/13 147/20 183/12	<b>level [4]</b> 17/4 101/23 134/6 193/13	<b>limit [1]</b> 92/8	<b>logs [6]</b> 72/5 75/5 75/13 180/15 180/19 180/19	
<b>larger [1]</b> 196/11	<b>leave [10]</b> 32/20 33/16 36/9 37/15 43/5 44/20 85/15 183/5 183/5 184/19	<b>levels [2]</b> 45/3 174/11	<b>limited [8]</b> 7/21 8/1 84/23 88/16 127/12 127/20 167/1 189/13	<b>long [15]</b> 1/17 9/1 15/25 23/1 23/3 29/6 66/1 66/23 96/15 127/19 127/25 161/13 182/1 183/10 194/19	
<b>largest [1]</b> 174/4	<b>leaving [3]</b> 37/11 37/20 40/22	<b>levied [1]</b> 154/25	<b>Linnell [1]</b> 86/25	<b>longer [3]</b> 90/18 141/25 143/8	
	<b>led [4]</b> 57/20 59/13 83/4 83/20		<b>lion's [1]</b> 69/8	<b>look [78]</b> 1/15 18/17 20/4 20/25 21/2 22/15 23/9 23/15 27/3 28/11 29/10 39/7 41/6 41/10 41/20 42/16 44/8 45/19 45/25 46/4 50/2 53/17 54/24 56/7 57/25 60/11 63/16 63/17 64/13 67/6 68/15 78/24 79/5 79/22 83/14 83/23 83/24 86/5 93/14 93/21 94/25 95/12 97/16 97/24 98/13 101/12 102/9 102/24 106/12 107/9 108/1 111/5 112/16 112/20 113/2 122/11 125/24 126/1 142/24 143/5 144/2 152/2 153/7 154/4 159/22 160/18 164/1 167/4 174/25 176/7 179/18 181/21 184/24 185/5 190/17 191/5 192/6 193/20	<b>looked [14]</b> 47/13 49/13 51/17 53/12

<p><b>L</b></p> <p><b>looked... [10]</b> 60/13 67/2 67/25 70/24 81/19 81/24 110/5 115/16 182/18 194/9</p> <p><b>looking [36]</b> 8/19 12/2 12/10 29/4 37/21 37/21 38/25 41/16 49/17 52/22 61/15 73/18 75/24 77/23 79/11 81/21 83/13 90/5 94/25 96/10 97/18 100/6 100/12 100/14 101/5 108/6 111/6 112/22 116/18 147/5 159/24 166/7 182/1 192/14 193/17 194/11</p> <p><b>looking/or [1]</b> 94/25</p> <p><b>looks [7]</b> 42/19 48/2 66/8 77/20 158/13 164/10 194/16</p> <p><b>Lord [1]</b> 176/2</p> <p><b>Lord Arbutnot [1]</b> 176/2</p> <p><b>losing [1]</b> 75/20</p> <p><b>loss [2]</b> 84/15 113/6</p> <p><b>losses [8]</b> 37/5 84/13 90/23 174/23 175/2 175/5 176/1 177/1</p> <p><b>lost [4]</b> 48/23 89/24 129/11 139/11</p> <p><b>lot [15]</b> 17/3 47/15 50/21 67/16 77/18 93/11 105/23 108/14 108/19 109/7 117/1 143/23 147/15 189/12 195/3</p> <p><b>lots [4]</b> 17/22 93/11 182/17 182/17</p> <p><b>love [6]</b> 38/13 39/11 39/13 39/15 39/22 45/14</p> <p><b>loved [1]</b> 45/17</p> <p><b>loving [1]</b> 45/13</p> <p><b>low [1]</b> 36/14</p> <p><b>lump [1]</b> 32/22</p> <p><b>lumping [1]</b> 167/4</p> <p><b>lunch [1]</b> 92/3</p>	<p><b>maintain [5]</b> 24/19 34/24 35/10 143/8 143/14</p> <p><b>maintaining [1]</b> 35/10</p> <p><b>major [1]</b> 155/17</p> <p><b>majority [11]</b> 32/11 33/24 35/20 35/25 38/3 38/12 39/19 40/14 40/20 73/23 177/1</p> <p><b>make [27]</b> 1/24 12/24 13/4 13/20 15/13 23/24 51/15 53/2 56/9 57/5 57/5 58/25 61/7 64/17 68/17 72/25 75/1 86/14 90/24 110/18 117/10 123/12 124/20 137/22 138/23 168/10 177/21</p> <p><b>maker [1]</b> 92/16</p> <p><b>makes [3]</b> 33/7 53/1 72/20</p> <p><b>making [14]</b> 4/3 27/16 37/8 60/25 70/13 92/19 92/21 95/19 96/4 96/12 114/12 121/24 175/8 175/12</p> <p><b>man [4]</b> 24/8 28/14 103/12 111/2</p> <p><b>manage [2]</b> 88/13 122/10</p> <p><b>managed [2]</b> 72/2 104/6</p> <p><b>management [9]</b> 23/13 40/25 41/2 62/21 112/25 122/22 123/15 123/20 124/8</p> <p><b>manager [3]</b> 24/4 65/14 120/25</p> <p><b>manner [3]</b> 105/2 106/15 119/9</p> <p><b>manuscript [1]</b> 158/8</p> <p><b>many [14]</b> 4/20 32/24 39/12 58/22 69/3 71/25 72/5 85/4 85/5 85/8 116/23 117/12 144/5 144/7</p> <p><b>March [2]</b> 1/18 87/11</p> <p><b>margin [1]</b> 43/17</p> <p><b>mark [11]</b> 29/12 29/16 31/9 42/4 55/1 56/2 58/14 60/12 61/3 86/12 106/21</p> <p><b>mark-up [1]</b> 106/21</p> <p><b>marked [2]</b> 186/16 188/8</p> <p><b>market [1]</b> 33/9</p> <p><b>marking [1]</b> 101/1</p> <p><b>markings [1]</b> 191/2</p> <p><b>martin [18]</b> 127/6 127/8 127/10 158/16 161/8 163/16 163/21</p>	<p>164/18 164/21 166/7 166/18 167/4 186/7 186/11 188/7 191/7 195/7 195/17</p> <p><b>master [1]</b> 148/9</p> <p><b>material [25]</b> 27/6 40/12 40/18 51/18 59/11 69/24 73/6 74/24 76/24 79/6 79/23 90/1 90/2 114/20 115/1 116/13 121/15 140/3 177/14 179/7 182/15 187/1 189/7 189/10 189/14</p> <p><b>materials [1]</b> 177/24</p> <p><b>mates [1]</b> 44/14</p> <p><b>maths [1]</b> 44/9</p> <p><b>matter [14]</b> 2/10 12/10 26/11 57/24 64/18 70/16 90/17 90/25 91/19 123/8 133/3 182/14 190/2 192/22</p> <p><b>matters [25]</b> 5/7 5/20 6/12 6/20 8/11 8/21 13/1 13/12 13/15 13/23 24/13 24/22 25/13 26/3 26/4 121/12 126/17 134/8 135/2 139/1 145/4 151/10 154/14 193/5 196/11</p> <p><b>Matthews [1]</b> 102/10</p> <p><b>maximise [1]</b> 115/20</p> <p><b>may [75]</b> 1/5 2/4 4/22 9/4 9/9 12/2 12/21 13/6 15/15 19/23 26/24 28/2 36/23 39/1 39/3 41/2 41/7 49/12 50/9 51/8 53/10 58/5 63/21 65/15 65/24 66/10 69/19 73/3 73/4 73/14 80/19 81/1 84/8 88/7 91/17 99/13 102/20 112/20 112/21 113/1 114/21 116/12 117/21 118/19 120/2 121/1 125/12 125/12 127/10 127/13 132/20 133/2 137/10 137/20 140/16 152/9 156/8 156/20 157/1 157/12 157/18 161/11 163/14 166/17 168/19 168/20 170/22 172/18 173/4 173/4 173/17 173/24 177/8 177/18 178/5</p> <p><b>May 2013 [1]</b> 121/1</p> <p><b>maybe [9]</b> 20/12 37/23 42/11 54/20 57/25 89/21 96/17 118/11 183/25</p> <p><b>McCormack [20]</b> 84/2 84/6 87/25 89/16</p>	<p>90/4 90/7 90/12 91/10 91/14 91/21 91/21 93/3 93/15 95/15 95/17 95/19 95/24 114/1 114/6 114/14</p> <p><b>McKenna [3]</b> 24/2 111/10 111/20</p> <p><b>McLachlan [5]</b> 50/4 50/14 51/1 51/4 51/24</p> <p><b>McLeod [1]</b> 173/21</p> <p><b>me [67]</b> 11/24 12/1 15/13 16/22 16/23 17/10 23/2 27/5 27/12 28/8 28/8 29/17 31/10 34/17 42/19 43/9 43/17 48/23 63/15 66/11 67/18 67/18 67/20 70/7 76/11 78/10 80/20 81/17 82/5 83/4 83/9 83/14 84/8 86/1 89/7 90/24 91/15 91/25 92/21 92/23 95/25 98/5 102/3 109/17 110/12 117/8 120/22 121/1 121/5 132/24 135/8 138/25 141/15 143/22 145/19 148/5 149/17 157/3 163/18 168/20 178/24 182/21 183/2 184/14 184/24 195/12 196/22</p> <p><b>mean [29]</b> 5/14 13/16 13/17 22/2 27/9 27/14 34/9 48/1 49/2 49/5 51/13 54/4 78/13 92/20 92/21 102/24 105/4 116/12 124/3 132/11 148/19 150/2 161/6 162/19 167/17 168/8 170/19 183/1 189/18</p> <p><b>meaning [6]</b> 7/20 7/25 34/6 38/24 81/2 89/3</p> <p><b>meaningfully [1]</b> 92/15</p> <p><b>means [11]</b> 18/24 36/6 47/23 89/7 147/3 150/2 161/18 162/11 168/2 169/12 169/20</p> <p><b>meant [4]</b> 51/18 89/1 104/24 189/17</p> <p><b>measure [2]</b> 37/9 142/21</p> <p><b>media [35]</b> 23/13 23/18 23/20 24/6 24/8 24/12 24/17 24/18 25/2 25/6 25/7 26/6 26/12 26/14 26/17 26/20 27/2 27/4 28/1 28/4 29/13 34/25 35/11 35/16 41/5 49/14 51/7 53/17</p>	<p>54/19 54/22 57/12 60/7 96/10 111/3 112/16</p> <p><b>media's [1]</b> 62/20</p> <p><b>media-facing [1]</b> 25/6</p> <p><b>mediate [1]</b> 99/11</p> <p><b>mediation [15]</b> 42/9 56/3 58/11 97/4 97/7 107/1 107/25 108/5 116/16 117/6 117/15 118/6 118/24 172/11 174/2</p> <p><b>meet [2]</b> 86/4 104/9</p> <p><b>meeting [16]</b> 49/13 58/13 58/17 60/13 102/13 102/17 103/1 103/6 103/7 104/3 104/4 104/7 104/11 124/11 148/15 173/16</p> <p><b>meets [2]</b> 74/25 189/11</p> <p><b>Mel [5]</b> 43/8 50/13 53/7 60/22 61/23</p> <p><b>Melanie [4]</b> 43/8 49/23 52/15 56/1</p> <p><b>member [2]</b> 11/25 185/20</p> <p><b>Members [1]</b> 118/16</p> <p><b>memory [1]</b> 173/6</p> <p><b>men [1]</b> 17/15</p> <p><b>mentality [3]</b> 62/18 62/23 183/22</p> <p><b>mention [8]</b> 67/19 127/2 164/2 168/10 171/18 177/16 195/18 195/21</p> <p><b>mentioned [6]</b> 14/2 131/12 161/24 162/17 164/4 180/8</p> <p><b>mentioning [1]</b> 130/17</p> <p><b>merits [5]</b> 43/13 98/9 103/4 107/22 183/24</p> <p><b>Messrs [1]</b> 121/6</p> <p><b>Messrs Scott [1]</b> 121/6</p> <p><b>met [6]</b> 43/16 60/15 73/1 76/25 88/8 180/7</p> <p><b>mid [11]</b> 50/10 55/2 83/13 83/18 123/14 123/19 130/15 131/1 134/10 134/25 175/19</p> <p><b>mid-2013 [7]</b> 83/13 83/18 123/14 123/19 131/1 134/10 134/25</p> <p><b>mid-2015 [3]</b> 50/10 55/2 175/19</p> <p><b>middle [3]</b> 73/10 94/6 94/21</p> <p><b>might [50]</b> 7/20 7/25 9/3 12/6 14/14 20/3 24/21 36/21 52/25 53/8 68/17 70/1 70/6</p>
<p><b>M</b></p> <p><b>made [26]</b> 14/13 28/8 36/10 39/18 40/13 40/19 45/2 58/20 66/21 67/6 68/14 69/21 83/9 92/23 97/17 108/24 129/20 130/9 139/9 139/20 145/10 147/18 148/4 176/16 177/2 193/15</p> <p><b>Madron [1]</b> 10/5</p> <p><b>main [1]</b> 5/6</p> <p><b>mainly [2]</b> 8/12 8/21</p>				

<b>M</b>	<b>misrepresented [2]</b> 55/7 55/10	40/11 41/13 41/18 41/21 42/16 42/16 44/2 46/4 46/18 46/18 46/21 55/15 60/6 60/24 61/11 61/16 62/6 62/10 70/21 72/9 74/16 80/18 80/22 84/6 86/11 87/14 87/25 89/16 90/4 90/7 90/12 91/10 91/14 91/21 91/21 93/3 93/15 95/17 95/19 95/24 98/24 101/16 102/9 106/20 107/8 108/7 108/11 113/24 114/6 114/14 114/18 114/22 115/1 118/1 120/25 122/13 122/18 124/24 125/8 125/22 126/9 126/15 127/2 127/22 127/22 128/15 128/25 129/24 133/1 135/14 136/18 136/19 136/20 136/23 138/17 141/10 142/3 142/12 142/23 143/15 144/18 145/3 145/4 145/7 145/22 145/22 146/3 146/3 146/5 147/7 148/14 148/22 150/1 150/4 150/7 150/9 150/9 150/12 150/22 151/6 151/8 151/13 151/15 151/25 152/15 153/3 156/17 156/20 157/1 157/18 162/14 162/15 162/18 163/6 163/7 163/10 163/12 165/4 166/2 166/2 166/5 167/5 167/17 168/8 168/9 168/17 170/2 170/9 170/12 170/25 171/12 172/14 172/18 173/1 173/12 177/17 178/23 179/19 180/11 183/22 185/11 186/7 186/8 186/9 186/23 187/10 188/16 192/7 194/4 194/12 197/3 197/7 197/17 199/4	<b>Mr Clarke's [15]</b> 125/22 126/9 135/14 141/10 142/23 143/15 145/4 145/7 145/22 146/3 148/22 150/1 150/12 163/6 165/4 <b>Mr Davies [6]</b> 29/22 46/18 46/21 61/11 86/11 87/14 <b>Mr Edwards [3]</b> 192/7 194/4 194/12 <b>Mr Flemington [3]</b> 98/24 136/19 186/8 <b>Mr Foat [2]</b> 72/9 74/16 <b>Mr Ishaq [1]</b> 186/7 <b>Mr Ishaq's [2]</b> 186/9 186/23 <b>Mr Jenkins [35]</b> 142/3 144/18 145/3 145/22 146/3 146/5 150/4 150/7 150/9 150/22 151/6 151/15 151/25 152/15 156/17 156/20 157/1 157/18 162/14 162/15 162/18 163/7 166/2 166/2 166/5 167/5 167/17 168/8 168/9 170/9 170/12 170/25 172/18 173/1 177/17 <b>Mr Jenkins' [3]</b> 133/1 142/12 148/14 <b>Mr McCormack [17]</b> 84/6 87/25 89/16 90/4 90/7 90/12 91/10 91/14 91/21 91/21 93/3 93/15 95/17 95/19 95/24 114/6 114/14 <b>Mr Parsons [1]</b> 106/20 <b>Mr Scott [4]</b> 122/13 122/18 125/8 136/18 <b>Mr Scott's [2]</b> 120/25 124/24 <b>Mr Singh [8]</b> 14/2 15/17 127/22 128/15 128/25 129/24 136/20 151/13 <b>Mr Singh's [1]</b> 15/23 <b>Mr Smith [8]</b> 163/10 163/12 168/17 170/2 171/12 185/11 187/10 188/16 <b>Mr Stevens [1]</b> 179/19 <b>Mr Swepson [2]</b> 101/16 102/9 <b>Mr Wallis [9]</b> 29/15 31/8 35/18 36/22 41/21 46/18 61/16 62/6 62/10 <b>Mr Wallis' [5]</b> 30/25	31/6 38/20 40/11 42/16 <b>Mr Warmington [2]</b> 55/15 180/11 <b>Mr Williams [19]</b> 1/9 27/13 28/13 41/13 46/4 60/6 70/21 80/22 113/24 114/18 114/22 115/1 118/1 147/7 153/3 173/12 183/22 197/7 197/17 <b>Ms [10]</b> 56/14 64/14 64/20 84/6 90/18 91/8 94/22 136/19 160/22 173/21 <b>Ms Corfield [1]</b> 56/14 <b>Ms Crichton [1]</b> 136/19 <b>Ms McLeod [1]</b> 173/21 <b>Ms Prime [2]</b> 64/14 64/20 <b>Ms van [1]</b> 94/22 <b>Ms Vennells [1]</b> 84/6 <b>Ms Vennells' [1]</b> 91/8 <b>much [16]</b> 1/4 1/13 3/25 14/23 28/18 44/22 59/22 60/5 82/12 92/9 94/12 114/16 127/14 150/16 150/17 153/2 <b>must [9]</b> 37/14 71/14 156/18 157/10 166/2 166/2 183/23 185/9 196/8 <b>my [113]</b> 1/9 7/16 7/17 8/18 9/1 9/21 12/1 12/1 12/1 13/12 13/17 13/23 15/7 15/11 20/8 20/8 20/11 20/20 21/17 21/22 24/3 24/5 27/12 27/13 27/17 27/21 28/3 28/22 30/23 33/19 37/24 42/23 46/5 50/22 51/11 51/11 51/22 54/16 62/8 62/12 62/16 64/6 67/11 68/1 69/6 70/7 70/16 75/2 75/22 76/23 78/6 80/7 80/7 80/25 81/8 81/14 81/22 81/24 82/1 82/1 82/9 83/6 86/4 86/13 87/6 87/10 88/4 88/5 89/6 89/24 91/18 91/24 93/17 93/19 93/20 93/25 95/5 100/12 100/21 101/21 102/4 103/12 103/17 104/6 107/10 109/11 116/17 117/19 118/5 118/20 121/8 122/3 130/24 132/4 138/7
----------	---	--	---	--

<b>M</b>	62/2 142/14 143/6 <b>Nevertheless [1]</b> 58/19 <b>new [22]</b> 6/9 6/18 6/21 30/1 73/7 73/23 74/17 75/7 76/12 77/17 79/6 81/10 114/19 122/5 131/7 131/19 157/22 157/24 158/3 190/8 190/11 197/4 <b>New York [2]</b> 6/18 6/21 <b>newly [4]</b> 73/9 73/16 122/6 131/4 <b>news [3]</b> 60/15 131/12 131/14 <b>next [18]</b> 31/6 31/25 35/17 47/15 47/15 54/23 72/13 74/6 77/2 77/7 108/20 150/19 153/3 159/22 160/22 162/24 165/7 193/15 <b>NFSP [3]</b> 31/23 62/3 62/3 <b>Nick [7]</b> 29/11 30/23 36/6 45/11 61/9 61/14 87/1 <b>nine [1]</b> 44/9 <b>nine years [1]</b> 44/9 <b>no [153]</b> 2/9 8/3 8/14 8/23 10/10 11/12 12/15 12/23 13/14 14/18 14/18 15/3 15/3 16/11 17/3 18/7 18/11 18/24 18/24 20/20 20/21 21/17 22/7 25/22 32/6 32/23 33/24 34/15 35/2 37/21 39/21 41/23 43/25 44/5 44/22 45/17 45/19 47/25 50/12 51/16 53/18 54/4 55/13 55/17 57/10 59/16 62/8 62/16 67/9 67/11 67/12 67/22 68/3 68/4 68/13 68/20 68/23 69/3 69/14 70/15 70/19 70/25 74/24 75/1 75/1 75/6 76/24 83/13 83/16 88/22 89/13 89/13 89/23 90/18 91/11 92/17 95/22 96/5 96/5 99/8 99/13 105/1 105/12 110/17 113/12 119/2 119/25 119/25 120/5 120/10 120/10 120/14 129/2 129/9 129/12 129/16 129/23 130/3 130/8 130/11 132/16 133/8 138/18 138/19 140/14 140/14 141/25	142/21 143/8 143/17 144/13 145/5 145/9 146/8 146/11 146/19 147/10 147/11 148/15 148/21 149/3 151/11 152/8 152/17 153/7 154/23 160/8 160/12 162/10 164/16 168/3 169/13 171/10 172/8 172/8 172/10 172/16 172/21 172/23 172/24 175/25 176/8 177/16 178/25 179/7 180/18 184/11 188/1 189/1 189/2 189/3 190/1 194/20 <b>nobody [1]</b> 81/19 <b>non [3]</b> 99/7 187/1 189/21 <b>non-disclosure [1]</b> 189/21 <b>non-privileged [1]</b> 187/1 <b>none [4]</b> 76/6 164/3 164/3 166/21 <b>nonetheless [1]</b> 122/25 <b>nor [3]</b> 9/7 127/21 128/1 <b>not [265]</b> <b>note [16]</b> 61/8 65/7 65/11 155/7 158/8 161/6 162/8 162/9 169/12 169/18 170/22 171/6 173/16 173/23 196/8 196/9 <b>noted [1]</b> 155/12 <b>notes [3]</b> 72/11 172/24 190/16 <b>nothing [4]</b> 48/9 86/3 92/23 99/6 <b>notice [1]</b> 180/13 <b>noticed [1]</b> 85/4 <b>notices [1]</b> 177/12 <b>notified [3]</b> 81/15 81/22 82/7 <b>notify [2]</b> 81/6 81/13 <b>noting [1]</b> 99/5 <b>notwithstanding [2]</b> 5/25 143/19 <b>November [8]</b> 92/1 95/13 98/22 100/7 106/19 114/8 145/23 180/23 <b>November 2015 [1]</b> 180/23 <b>now [35]</b> 11/6 11/10 29/25 39/10 42/10 46/22 50/3 58/4 66/7 71/25 73/5 73/25 77/13 81/1 81/9 82/15 82/24 84/11 85/17 87/23 90/6 101/15 106/19 113/13 124/1	139/25 147/14 148/1 152/19 170/5 175/17 182/5 185/7 194/18 197/9 <b>number [20]</b> 10/13 12/24 14/13 36/18 37/10 37/19 38/1 38/8 45/1 56/19 84/5 115/15 122/12 127/8 154/24 155/13 173/11 186/21 189/13 192/2 <b>numbered [1]</b> 181/4 <b>numbers [3]</b> 10/22 38/5 41/14 <b>numerous [1]</b> 59/2 <b>nutshell [1]</b> 61/15 <b>O</b> <b>objectives [3]</b> 26/2 27/15 27/17 <b>obligation [2]</b> 33/11 33/12 <b>obligations [3]</b> 15/19 15/20 160/20 <b>Obody [1]</b> 95/22 <b>obscuring [1]</b> 190/21 <b>observe [1]</b> 14/23 <b>observed [2]</b> 14/16 15/13 <b>obtain [2]</b> 116/8 187/23 <b>obtained [1]</b> 116/13 <b>obtaining [2]</b> 122/2 187/20 <b>obvious [2]</b> 33/2 185/3 <b>obviously [2]</b> 4/2 63/13 <b>occasion [1]</b> 187/22 <b>occasions [1]</b> 12/25 <b>occur [1]</b> 44/12 <b>occurred [1]</b> 141/12 <b>occurring [1]</b> 41/13 <b>October [7]</b> 64/2 67/25 72/1 72/8 84/3 84/6 87/16 <b>odd [5]</b> 69/17 69/24 74/17 76/19 119/18 <b>of [1]</b> 137/2 <b>off [8]</b> 42/2 79/12 83/25 147/5 181/1 183/24 189/4 193/8 <b>offensive [1]</b> 104/15 <b>offer [6]</b> 20/22 21/9 21/13 50/20 69/13 70/25 <b>offered [6]</b> 45/2 58/23 59/3 88/7 118/18 195/4 <b>offers [1]</b> 59/8 <b>office [212]</b> <b>Office's [60]</b> 4/16 5/5 15/20 16/13 23/19 23/21 24/5 24/9 24/12	24/15 24/22 24/25 25/7 26/6 26/17 26/23 27/2 27/25 28/3 29/13 34/23 41/5 51/7 64/10 64/22 70/2 79/20 99/5 103/10 103/15 103/21 104/8 104/12 105/12 106/13 106/21 107/18 108/15 108/20 109/1 109/16 116/12 117/20 118/13 128/9 138/11 141/23 145/15 147/12 148/23 170/14 171/4 173/20 174/6 177/21 180/12 183/3 185/21 186/13 188/21 <b>offices [3]</b> 14/9 104/3 127/17 <b>often [4]</b> 7/9 77/15 103/12 184/22 <b>oh [9]</b> 53/15 53/21 124/1 149/11 162/3 165/5 171/10 173/4 194/20 <b>Oil [2]</b> 120/11 120/13 <b>okay [28]</b> 3/13 4/20 4/24 10/12 17/15 19/25 31/2 41/24 42/1 42/2 58/6 59/8 64/3 72/5 93/14 120/20 143/11 146/20 161/5 161/15 161/20 162/5 162/21 169/17 175/22 176/3 176/6 178/25 <b>Old [3]</b> 42/21 102/13 104/7 <b>omission [2]</b> 140/19 140/22 <b>on [271]</b> <b>once [4]</b> 74/12 80/10 123/2 155/15 <b>one [73]</b> 3/13 4/18 4/24 7/21 9/7 14/7 16/18 18/12 22/24 22/25 24/4 26/19 29/20 41/7 41/23 46/19 46/25 51/6 53/8 53/18 55/12 57/4 57/4 59/9 60/6 69/24 81/2 84/5 84/16 85/21 86/5 88/6 89/22 91/25 96/16 103/19 104/15 104/15 105/7 105/14 105/14 105/15 105/20 109/5 109/13 110/4 110/4 121/9 122/13 132/5 133/24 134/23 135/22 136/1 141/17 143/1 146/4 146/14 147/7 147/10 147/11 151/23 154/11 155/17 163/14 163/18 169/14 179/6 181/13 184/15 184/16 184/18 193/15
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<b>O</b>	31/13 32/20 32/22 33/5 34/5 36/2 37/9 38/7 38/24 43/5 45/16 47/24 49/14 51/14 51/21 55/2 57/6 57/22 59/14 62/13 62/14 62/15 63/10 64/7 65/13 65/15 68/6 73/4 73/19 74/4 75/7 75/14 75/21 78/4 79/4 79/21 81/12 84/3 85/13 88/2 88/15 88/20 91/21 92/10 92/14 94/25 96/11 96/18 97/24 98/7 98/14 99/11 100/3 100/7 100/9 100/18 101/6 103/1 103/9 104/24 105/6 105/14 106/1 106/15 106/24 109/7 109/12 109/15 109/18 110/10 111/8 112/4 112/21 115/6 115/8 116/13 116/24 117/5 117/15 118/3 118/6 118/22 118/24 121/8 121/12 121/16 121/18 122/2 122/18 122/21 123/2 123/2 123/10 124/4 124/11 125/12 129/5 129/13 129/24 130/5 131/18 133/6 133/14 135/20 138/24 138/24 139/7 139/23 140/6 140/23 142/12 142/22 143/15 144/23 145/10 145/17 146/15 147/8 147/24 147/25 148/4 148/5 148/15 148/19 150/5 150/11 151/12 151/13 151/14 151/16 154/12 155/10 156/1 156/2 158/2 159/18 164/14 166/14 167/10 167/11 168/8 170/4 170/6 170/24 172/13 174/20 175/15 181/13 182/9 183/19 184/6 184/21 186/4 186/25 187/1 187/16 188/6 189/8 189/21 197/13 <b>oral</b> [2] 34/5 151/7 <b>orally</b> [2] 148/1 151/18 <b>order</b> [3] 4/4 12/22 190/4 <b>ordered</b> [3] 76/4 76/6 124/12 <b>orders</b> [1] 69/21 <b>ordinary</b> [1] 115/25 <b>organisation</b> [2] 85/11 127/16 <b>organisations</b> [1] 118/22	<b>organise</b> [1] 115/18 <b>organised</b> [1] 48/2 <b>original</b> [1] 115/7 <b>originally</b> [1] 190/22 <b>originals</b> [1] 31/6 <b>originate</b> [1] 78/11 <b>originating</b> [1] 41/24 <b>origins</b> [1] 97/14 <b>other</b> [49] 7/11 7/22 8/12 8/22 9/7 18/13 20/9 20/17 22/12 22/17 24/11 32/12 36/13 36/25 37/12 41/4 45/20 53/4 54/5 55/12 63/21 67/14 73/22 74/3 74/23 76/19 81/5 81/25 85/1 86/24 89/17 91/4 91/11 91/19 92/1 93/13 118/19 120/8 121/10 125/20 137/9 141/4 149/20 151/13 155/14 162/12 171/25 177/9 196/12 <b>others</b> [18] 7/15 8/1 8/9 13/4 19/5 20/13 60/12 64/19 78/11 79/5 86/7 93/25 122/14 128/9 136/19 172/4 181/23 184/3 <b>otherwise</b> [6] 31/13 37/14 66/12 123/2 189/8 189/15 <b>ought</b> [6] 22/8 135/23 136/13 139/6 139/17 139/23 <b>our</b> [39] 14/5 15/11 30/13 32/9 32/11 32/13 32/16 36/5 44/19 46/23 55/4 60/19 68/17 69/15 70/16 72/25 75/3 79/1 79/7 79/9 79/25 93/15 97/2 99/3 102/13 102/16 102/19 104/19 111/17 137/7 153/22 156/3 183/13 184/14 192/11 192/15 192/17 192/18 192/20 <b>ourselves</b> [2] 21/5 141/6 <b>out</b> [60] 2/6 2/13 2/17 2/24 4/3 18/24 18/25 24/14 29/19 32/5 35/23 43/10 46/20 46/24 51/3 51/23 52/21 57/14 61/13 72/10 75/15 77/13 77/25 83/1 86/4 89/14 99/4 99/9 102/18 105/22 107/14 108/7 123/2 125/12 131/11 131/17 131/22 131/23 131/24 133/18 133/20	133/21 137/1 137/25 140/12 147/2 147/19 151/25 153/24 155/3 158/17 172/23 173/5 174/1 177/17 180/20 184/15 187/18 189/23 193/19 <b>outcome</b> [2] 99/14 162/4 <b>outcomes</b> [1] 163/18 <b>outline</b> [1] 99/1 <b>outlining</b> [1] 61/23 <b>outreach</b> [1] 182/6 <b>outside</b> [4] 7/16 67/2 67/6 148/11 <b>over</b> [37] 4/9 8/5 9/1 11/8 11/11 11/14 15/22 16/8 19/1 19/5 31/21 38/17 46/11 50/23 56/18 61/10 73/8 73/16 78/25 79/9 79/25 82/23 86/21 92/3 97/25 107/10 114/19 115/21 121/15 121/18 155/11 161/23 166/18 169/17 174/17 176/22 189/16 <b>Overall</b> [3] 6/22 40/10 40/21 <b>overarching</b> [1] 105/12 <b>overnight</b> [3] 50/19 56/9 197/17 <b>overreaching</b> [1] 193/21 <b>overrun</b> [1] 197/14 <b>oversimplification</b> [1] 8/14 <b>overstating</b> [1] 183/25 <b>overwhelming</b> [4] 56/21 56/25 57/3 58/2 <b>owe</b> [1] 167/1 <b>owes</b> [1] 15/21 <b>owing</b> [2] 2/14 2/18 <b>own</b> [16] 8/6 8/24 53/12 74/24 76/24 86/3 86/4 100/25 101/1 101/1 101/3 170/14 171/1 179/17 184/6 184/8 <b>owned</b> [2] 116/23 117/12	31/8 31/21 38/18 39/7 39/9 41/6 41/20 46/1 46/11 46/11 46/11 47/9 49/17 50/16 50/23 50/23 52/6 53/5 53/6 54/24 54/24 55/8 56/5 58/12 60/11 61/2 61/10 61/10 61/11 61/22 63/18 63/20 72/7 84/1 86/5 86/10 86/21 90/6 90/11 91/1 91/2 91/7 94/4 94/7 94/20 94/21 95/12 97/20 97/22 100/6 101/16 106/20 111/6 111/6 114/6 114/7 115/2 115/14 120/20 122/13 126/8 126/8 126/10 126/15 130/14 135/13 135/15 138/4 138/6 141/14 142/24 150/1 153/9 155/11 164/5 167/15 168/4 169/2 169/17 169/17 174/17 176/22 179/21 180/17 180/18 181/19 181/20 181/21 185/7 186/5 186/6 186/9 188/15 188/16 189/16 189/25 190/5 192/6 192/6 193/22 194/4 194/17 194/18 194/24 195/10 195/23 <b>page 1</b> [11] 30/17 61/10 91/1 111/6 126/10 135/15 181/21 188/15 190/5 194/24 195/23 <b>page 10</b> [4] 46/1 46/11 55/8 126/15 <b>page 11</b> [3] 7/6 46/11 142/24 <b>page 13</b> [2] 58/12 150/1 <b>page 131</b> [1] 22/15 <b>page 14</b> [2] 115/2 126/8 <b>page 15</b> [1] 97/20 <b>page 16</b> [1] 115/14 <b>page 17</b> [1] 120/20 <b>page 18</b> [2] 2/2 2/2 <b>page 2</b> [12] 21/3 30/4 41/6 50/16 52/6 61/2 86/5 111/6 179/21 181/19 181/20 195/10 <b>page 21</b> [1] 2/8 <b>page 23</b> [1] 130/14 <b>page 3</b> [11] 29/10 30/6 31/7 50/23 60/11 84/1 95/12 169/17 189/25 193/22 194/4 <b>page 35</b> [2] 138/4 138/6 <b>page 38</b> [1] 185/7
----------	---	---	---	--

<b>P</b>	<b>paragraph 30 [2]</b> 115/2 115/3	113/6 122/22 128/17 143/10 143/16 145/17 149/23 155/1 159/19 179/7 192/14	161/16 161/17 170/1 <b>percentage [1]</b> 85/1 <b>perception [3]</b> 157/11 157/14 157/21 <b>Perceptions [1]</b> 155/25 <b>perfectly [2]</b> 19/6 70/11 <b>perform [1]</b> 16/9 <b>performing [1]</b> 16/9 <b>perhaps [1]</b> 85/15 <b>period [16]</b> 4/3 8/5 8/13 9/1 9/12 9/15 10/3 10/4 10/9 11/13 12/18 17/1 28/25 80/24 97/19 182/19 <b>periods [1]</b> 174/9 <b>permit [1]</b> 27/5 <b>person [9]</b> 20/9 34/18 43/16 86/24 89/4 92/9 93/13 94/11 197/12 <b>personal [2]</b> 5/25 65/15 <b>personally [4]</b> 23/6 85/15 130/1 142/2 <b>perspective [1]</b> 152/16 <b>petrochemical [1]</b> 120/13 <b>petty [1]</b> 38/24 <b>phase [5]</b> 64/19 102/6 102/6 148/1 168/13 <b>phrase [1]</b> 15/8 <b>physical [1]</b> 187/19 <b>pick [1]</b> 197/1 <b>picked [1]</b> 127/3 <b>picking [1]</b> 126/3 <b>picture [2]</b> 16/21 25/2 <b>piece [8]</b> 47/20 49/11 51/9 53/8 66/4 159/6 185/24 190/25 <b>piecemeal [1]</b> 30/10 <b>pieces [2]</b> 7/21 141/16 <b>pipe [1]</b> 71/18 <b>place [10]</b> 49/12 76/16 80/23 93/17 110/25 115/11 139/25 140/17 141/4 157/4 <b>placed [4]</b> 73/14 121/14 123/5 147/13 <b>plan [4]</b> 14/10 27/15 28/6 148/9 <b>Planner [1]</b> 101/17 <b>plausible [1]</b> 163/11 <b>pleaded [3]</b> 53/19 54/8 54/13 <b>please [134]</b> 1/5 1/11 1/16 1/20 1/25 2/16 2/21 3/2 4/10 7/6 9/20 10/17 18/4 23/12	23/15 27/6 27/23 29/4 29/7 30/17 31/7 38/18 41/6 41/20 41/21 42/4 42/5 43/15 45/25 46/1 46/6 47/9 47/9 49/17 50/1 50/16 52/3 53/5 53/14 54/23 55/25 56/4 56/13 58/12 59/20 59/21 60/6 61/2 63/2 63/16 63/20 64/13 65/8 66/14 70/20 72/7 72/10 75/11 79/18 79/19 80/21 82/16 82/18 83/23 83/24 86/8 91/1 94/4 94/5 94/7 94/20 95/12 97/20 98/13 101/12 111/5 111/7 113/14 115/3 115/14 122/11 126/15 128/14 130/13 135/10 135/13 135/15 136/15 138/4 142/23 143/12 146/24 149/25 150/1 153/3 153/7 153/13 154/4 158/7 158/18 158/21 159/3 159/8 159/11 159/22 159/23 160/9 160/19 162/5 165/21 167/4 168/15 169/17 173/10 173/25 174/17 179/18 179/19 179/21 179/23 179/25 181/19 185/5 186/5 186/9 186/20 186/22 187/5 188/15 190/6 191/5 192/1 193/22 195/11 <b>plough [1]</b> 120/19 <b>plus [6]</b> 38/7 63/10 77/21 84/25 169/24 170/1 <b>pm [6]</b> 113/14 113/19 113/21 152/22 152/24 197/25 <b>PMs [2]</b> 175/4 175/25 <b>POA [1]</b> 174/16 <b>point [52]</b> 12/24 24/8 28/14 32/13 35/15 35/22 36/7 36/10 37/4 37/8 51/23 53/1 53/2 53/18 58/20 61/17 61/22 65/3 65/19 76/12 76/13 76/18 77/2 77/7 78/22 92/14 95/9 95/21 97/1 103/12 106/6 109/1 109/25 110/5 110/9 111/2 114/12 121/3 136/5 146/17 146/21 163/24 165/23 166/24 167/23 175/25 186/12 186/16 191/1 191/13 193/23 194/2 <b>points [13]</b> 23/10
<b>page 4 [7]</b> 39/9 72/7 90/6 186/5 192/6 194/17 194/18 <b>page 40 [1]</b> 141/14 <b>page 5 [3]</b> 90/11 94/20 192/6 <b>page 50 [1]</b> 97/22 <b>page 54 [2]</b> 2/21 2/22 <b>page 7 [2]</b> 94/4 94/7 <b>page 8 [1]</b> 47/9 <b>page 84 [1]</b> 23/16 <b>page 88 [1]</b> 24/14 <b>page 97 [1]</b> 3/3 <b>pages [7]</b> 1/17 19/1 20/16 52/13 83/24 119/18 192/4 <b>pages 3 [1]</b> 83/24 <b>Pages 4 [1]</b> 192/4 <b>paint [1]</b> 25/7 <b>paints [1]</b> 25/1 <b>pan [1]</b> 158/17 <b>Panorama [9]</b> 26/22 50/11 53/22 56/8 56/10 58/20 59/14 60/16 61/20 <b>paper [3]</b> 7/21 46/6 90/23 <b>paragraph [52]</b> 2/2 2/8 2/21 3/3 7/7 7/14 19/15 20/24 21/1 21/2 21/20 22/15 23/4 23/15 23/17 24/14 27/24 31/25 35/17 38/11 47/16 52/20 71/14 90/12 97/21 97/22 97/22 98/4 100/13 107/6 110/13 115/2 115/3 115/14 120/21 126/15 128/4 130/12 130/13 135/15 135/16 135/21 138/3 138/6 141/13 143/10 143/16 150/6 156/6 160/16 185/6 189/25 <b>paragraph 1 [1]</b> 135/16 <b>paragraph 106 [1]</b> 2/21 <b>paragraph 169 [1]</b> 23/15 <b>paragraph 175 [2]</b> 24/14 27/24 <b>paragraph 195 [1]</b> 3/3 <b>paragraph 2 [2]</b> 135/15 135/21 <b>paragraph 22 [1]</b> 7/7 <b>Paragraph 255 [1]</b> 22/15 <b>paragraph 28 [1]</b> 126/15 <b>paragraph 3 [1]</b> 23/4	<b>paragraph 30 [2]</b> 115/2 115/3 <b>paragraph 32 [5]</b> 97/21 97/22 97/22 98/4 100/13 <b>paragraph 34 [2]</b> 115/14 160/16 <b>paragraph 35 [2]</b> 143/10 143/16 <b>paragraph 36 [2]</b> 2/2 120/21 <b>paragraph 38 [1]</b> 150/6 <b>paragraph 41 [1]</b> 2/8 <b>paragraph 46 [2]</b> 128/4 130/12 <b>paragraph 69 [2]</b> 138/3 138/6 <b>paragraph 76 [1]</b> 185/6 <b>paragraph 80 [1]</b> 141/13 <b>paragraphs [8]</b> 31/1 37/7 40/11 82/17 97/25 114/9 126/20 143/5 <b>paragraphs 29 [1]</b> 97/25 <b>paragraphs 33 [1]</b> 143/5 <b>paragraphs 44 [1]</b> 82/17 <b>paranoid [1]</b> 184/3 <b>paraphrasing [1]</b> 51/20 <b>pardon [12]</b> 52/12 64/4 97/23 98/21 143/3 146/22 163/17 164/20 173/9 173/15 191/12 194/22 <b>Parker [1]</b> 90/8 <b>Parliament [1]</b> 118/17 <b>Parsons [5]</b> 63/22 64/16 102/10 106/20 181/22 <b>part [35]</b> 11/22 12/5 17/7 17/19 22/16 28/24 33/14 35/8 40/11 40/17 86/16 90/10 103/12 113/9 116/7 117/5 117/22 118/14 120/18 121/7 121/9 129/17 138/23 139/22 147/8 159/2 159/24 163/9 168/4 168/5 169/2 169/20 177/5 194/5 194/13 <b>partic [1]</b> 159/18 <b>Participants [2]</b> 197/5 197/12 <b>participate [1]</b> 137/6 <b>particular [16]</b> 12/6 18/9 26/11 59/12 96/6	<b>particularly [5]</b> 7/11 25/13 42/21 104/5 196/22 <b>partner [3]</b> 63/22 64/16 111/10 <b>parts [10]</b> 7/10 17/23 121/10 124/13 126/14 133/16 139/11 142/5 186/24 193/5 <b>party [4]</b> 3/11 99/24 115/10 144/23 <b>passage [1]</b> 70/1 <b>passed [1]</b> 79/10 <b>passes [1]</b> 29/23 <b>passing [1]</b> 20/13 <b>password [2]</b> 65/7 123/6 <b>past [10]</b> 4/9 83/19 87/2 124/16 142/9 142/11 145/11 148/23 149/2 193/25 <b>pasted [1]</b> 123/11 <b>Patel [1]</b> 87/1 <b>patently [1]</b> 51/1 <b>Patrick [1]</b> 42/6 <b>Paula [5]</b> 84/2 86/6 86/19 90/7 195/9 <b>pause [3]</b> 21/5 97/1 98/16 <b>pausing [1]</b> 131/6 <b>payments [8]</b> 125/16 126/23 130/2 130/6 130/21 134/16 180/24 181/5 <b>Pearce [1]</b> 179/24 <b>pedantic [1]</b> 80/19 <b>pejorative [1]</b> 144/13 <b>penetrating [2]</b> 181/16 182/23 <b>penultimate [1]</b> 71/13 <b>people [47]</b> 7/22 11/23 12/20 12/21 12/22 21/10 21/11 21/13 21/14 22/1 22/12 22/16 23/5 25/15 29/23 30/18 39/12 39/14 39/15 45/13 45/20 50/25 54/3 54/5 56/1 63/21 78/2 85/18 89/17 89/21 93/9 93/11 94/8 131/7 131/9 131/13 131/14 131/15 131/19 133/14 141/3 142/18 146/12 149/18 177/9 182/17 197/10 <b>people's [2]</b> 8/12 8/22 <b>per [5]</b> 93/18 161/5		



<b>P</b>	<b>POL00232517 [1]</b> 60/9	48/13	<b>privilege [21]</b> 65/1 65/2 115/21 116/10 116/20 121/15 121/17 121/20 121/24 146/17 146/21 153/4 160/1 160/3 187/5 187/5 187/22 188/2 188/18 188/20 189/10	164/21
<b>points... [12]</b> 30/13 37/3 59/13 60/20 61/1 72/11 74/7 78/2 99/3 99/4 159/9 167/14	<b>police [2]</b> 144/19 144/24	<b>pragmatic [1]</b> 138/25	<b>pre [2]</b> 69/22 114/18	<b>professional [2]</b> 115/21 121/15
<b>POL [4]</b> 52/9 117/1 131/7 181/2	<b>Policy [3]</b> 42/14 44/2 65/10	<b>pre-action [1]</b> 69/22	<b>pre-judgment [1]</b> 114/18	<b>Professor [4]</b> 50/14 51/4 51/24 87/1
<b>POL00006799 [1]</b> 135/10	<b>politicians [1]</b> 53/3	<b>predesigned [2]</b> 27/15 28/6	<b>predetermined [1]</b> 18/11	<b>Professor Button [1]</b> 87/1
<b>POL00038852 [1]</b> 63/16	<b>poor [1]</b> 27/21	<b>predominantly [1]</b> 8/10	<b>preference [2]</b> 34/18 95/5	<b>Professor Charles [1]</b> 50/14
<b>POL00040000 [3]</b> 125/25 142/24 149/25	<b>poorly [1]</b> 39/3	<b>preferences [2]</b> 34/2 34/3	<b>prefernces [2]</b> 34/2 34/3	<b>Professor McLachlan [2]</b> 51/4 51/24
<b>POL00041382 [1]</b> 93/21	<b>portray [1]</b> 107/15	<b>prejudiced [2]</b> 159/21 189/7	<b>prejudged [2]</b> 159/21 189/7	<b>programme [13]</b> 26/22 46/19 46/20 47/4 50/22 58/20 58/24 59/4 59/12 59/14 101/17 101/17 103/16
<b>POL00043169 [2]</b> 71/23 76/12	<b>position [13]</b> 6/2 18/11 24/22 24/25 35/15 78/2 102/19 104/19 104/19 106/13 116/12 121/11 183/13	<b>premise [3]</b> 161/5 161/14 161/20	<b>preparation [1]</b> 115/19	<b>programmes [1]</b> 46/24
<b>POL00066789 [1]</b> 185/10	<b>positioning [2]</b> 26/24 159/6	<b>prepared [12]</b> 21/16 21/25 90/19 156/8 156/15 157/1 180/11 186/18 187/19 188/3 190/14 193/3	<b>probably [16]</b> 11/6 21/19 25/16 28/21 52/2 54/20 63/1 86/19 101/4 119/14 132/8 147/17 159/25 184/1 195/8 195/18	<b>progressing [1]</b> 157/13
<b>POL00074005 [1]</b> 106/17	<b>positive [3]</b> 15/14 142/9 148/3	<b>present [4]</b> 68/9 131/9 154/14 185/15	<b>probity [1]</b> 146/4	<b>project [2]</b> 103/13 103/18
<b>POL00101923 [1]</b> 28/12	<b>positively [2]</b> 60/24 104/16	<b>presentation [2]</b> 24/24 58/21	<b>problem [4]</b> 42/22 48/6 94/24 181/7	<b>prolong [1]</b> 90/14
<b>POL00101968 [1]</b> 45/25	<b>Posnett [1]</b> 121/2	<b>presented [4]</b> 28/8 106/16 155/15 190/9	<b>Problem' [1]</b> 181/5	<b>prompt [2]</b> 70/22 71/8
<b>POL00103238 [2]</b> 179/18 179/19	<b>possibility [2]</b> 19/12 96/14	<b>press [1]</b> 85/12	<b>problems [9]</b> 36/1 36/24 39/19 40/15 40/21 154/24 175/23 176/9 180/10	<b>promptly [1]</b> 81/15
<b>POL00105856 [1]</b> 49/16	<b>possible [14]</b> 66/1 66/24 70/25 103/23 104/19 105/21 111/17 111/19 112/9 114/2 127/23 145/12 181/2 184/20	<b>pressing [1]</b> 182/11	<b>proceed [3]</b> 78/3 85/22 86/15	<b>proper [3]</b> 117/6 117/15 118/6
<b>POL00108163 [1]</b> 191/5	<b>possibly [16]</b> 4/23 9/9 9/9 34/17 70/23 71/10 77/11 103/24 123/5 132/22 161/18 169/19 172/20 173/4 187/8 188/1	<b>pressure [3]</b> 44/7 48/5 153/18	<b>proceeding [1]</b> 116/4	<b>properly [18]</b> 27/11 56/11 90/3 102/22 105/7 106/12 116/19 151/16 151/25 164/23 165/15 170/10 170/13 170/25 172/19 173/2 177/6 178/21
<b>POL00113008 [1]</b> 58/6	<b>post [267]</b>	<b>pretend [1]</b> 147/20	<b>proceedings [16]</b> 15/21 55/23 108/13 110/9 110/24 133/13 142/1 149/9 149/22 153/16 155/19 155/21 156/5 173/5 173/7 188/22	<b>proportion [2]</b> 38/2 45/4
<b>POL00117614 [1]</b> 83/23	<b>post-dates [1]</b> 66/2	<b>pretending [3]</b> 135/1 135/6 157/16	<b>proceeds [3]</b> 2/12 2/13 2/18	<b>proposal [2]</b> 66/21 99/2
<b>POL00118066 [1]</b> 114/4	<b>post-trial [1]</b> 114/18	<b>pretty [6]</b> 28/18 77/17 87/3 113/2 113/3 113/4	<b>process [17]</b> 23/5 88/13 100/3 101/6 104/25 105/18 107/19 115/6 116/16 121/4 139/6 139/18 152/9 176/15 178/3 179/9 180/13	<b>proposals [1]</b> 99/1
<b>POL00119584 [1]</b> 90/5	<b>postmaster [6]</b> 17/24 48/21 87/5 94/23 95/2 95/6	<b>presumably [2]</b> 161/14 169/15	<b>proceeds [3]</b> 2/12 2/13 2/18	<b>propose [2]</b> 99/8 197/15
<b>POL00125758 [1]</b> 173/10	<b>postmasters [13]</b> 14/24 15/5 17/5 39/22 54/20 55/23 65/19 99/7 101/24 108/16 174/5 174/23 176/11	<b>presumption [1]</b> 186/12	<b>process [17]</b> 23/5 88/13 100/3 101/6 104/25 105/18 107/19 115/6 116/16 121/4 139/6 139/18 152/9 176/15 178/3 179/9 180/13	<b>proposed [8]</b> 23/25 50/13 51/3 56/14 99/6 107/5 140/6 174/1
<b>POL00140620 [1]</b> 154/4	<b>postmasters' [2]</b> 22/20 49/15	<b>pretend [1]</b> 147/20	<b>processes [4]</b> 2/23 22/19 31/24 176/23	<b>proposing [3]</b> 23/24 65/25 76/2
<b>POL00142323 [2]</b> 122/11 122/12	<b>potential [7]</b> 115/20 124/3 142/3 149/1 149/9 155/14 174/15	<b>pretending [3]</b> 135/1 135/6 157/16	<b>processing [1]</b> 174/20	<b>prosecute [1]</b> 161/20
<b>POL00143827 [1]</b> 98/13	<b>potentially [5]</b> 57/22 138/21 139/7 139/19 142/13	<b>prevention [1]</b> 189/14	<b>produce [1]</b> 81/6	<b>prosecuting [3]</b> 11/1 11/4 12/20
<b>POL00145120 [1]</b> 111/5	<b>pounds [1]</b> 84/13	<b>previously [6]</b> 1/14 5/19 56/17 61/18 73/6 140/12	<b>produced [5]</b> 55/11 58/11 107/25 143/21 181/10	<b>prosecution [14]</b> 11/3 12/9 83/12 90/9 129/18 150/5 150/10 161/14 174/15 180/13 182/14 186/14 189/22 192/13
<b>POL00150306 [1]</b> 41/5	<b>powerful [1]</b> 166/12	<b>primary [3]</b> 9/1 31/22 135/25	<b>producing [3]</b> 81/3 90/22 102/18	<b>prosecutions [23]</b> 10/14 10/23 11/7 124/16 132/12 132/17 134/3 137/11 138/14
<b>POL00152725 [2]</b> 52/3 52/11	<b>practical [1]</b> 177/13	<b>prime [5]</b> 63/18 64/8 64/14 64/20 132/19	<b>product [2]</b> 155/12	
<b>POL00152777 [1]</b> 54/23	<b>practice [4]</b> 6/14 6/24 27/4 154/17	<b>principal [2]</b> 108/23 110/5		
<b>POL00155555 [1]</b> 158/7	<b>practices [4]</b> 108/15 108/20 109/2 176/24	<b>principles [1]</b> 174/22		
<b>POL00186090 [1]</b> 101/12	<b>practised [2]</b> 48/11	<b>printed [1]</b> 180/19		
<b>POL00191968 [1]</b> 136/16		<b>prior [5]</b> 6/24 65/6 126/18 128/7 131/18		
<b>POL00193383 [1]</b> 153/8		<b>private [2]</b> 6/24 120/3		

<b>P</b>	purely [1] 36/2 purpose [11] 3/5 3/7 3/12 3/13 3/16 35/5 99/10 104/20 106/24 138/7 140/23 purpose' [1] 99/20 purposes [5] 105/25 116/20 122/2 154/14 187/20 pursuant [1] 154/17 pursue [1] 96/6 pursued [1] 177/10 pursuing [2] 113/5 137/12 pursuit [1] 23/13 put [27] 28/23 35/23 43/5 44/13 46/6 48/4 49/11 80/20 83/4 89/17 101/23 103/23 104/18 138/1 139/24 140/16 140/19 141/1 145/21 147/6 149/15 153/13 153/18 168/19 171/24 172/20 192/25 putting [5] 13/25 106/14 115/11 136/21 162/20	questions [25] 1/10 4/6 27/9 27/11 27/14 30/1 30/24 47/8 53/21 54/1 54/5 88/20 114/17 117/19 132/15 151/13 153/3 153/4 157/16 174/11 181/17 182/22 195/11 196/25 197/7 quick [4] 107/10 111/18 123/17 195/17 quickly [3] 113/4 114/8 140/17 quite [42] 3/20 9/9 15/25 21/17 26/3 29/6 33/8 37/23 59/6 67/7 67/7 69/4 69/11 70/25 77/11 77/14 78/13 83/15 92/20 92/24 93/1 96/15 103/12 103/24 104/4 108/24 118/18 124/15 124/15 124/17 142/9 142/20 143/23 147/15 162/10 169/19 172/20 173/4 175/17 182/11 184/7 189/12 quote [3] 9/17 53/16 174/14 quotes [1] 169/9	42/25 47/2 57/17 68/8 76/15 78/17 89/11 101/7 108/8 139/6 139/17 167/4 183/24 185/19 rationale [2] 90/20 136/7 re [1] 136/20 reach [1] 86/3 reaching [1] 182/19 reacting [1] 134/7 reaction [4] 30/20 70/9 108/7 166/8 read [26] 2/4 3/9 18/24 18/25 19/20 21/5 27/24 28/2 30/7 34/22 39/23 41/15 45/9 72/20 74/6 97/24 109/19 110/3 143/11 149/14 152/4 152/5 158/15 167/14 176/20 196/5 readable [1] 123/12 reading [9] 40/16 44/22 47/3 67/17 68/5 72/17 96/1 96/1 158/25 real [1] 189/20 realisation [2] 171/20 172/17 realise [1] 85/18 realised [2] 170/9 170/24 reality [2] 60/20 70/21 really [9] 16/20 39/13 47/18 60/21 76/23 95/1 124/22 151/10 184/18 reason [10] 36/13 67/19 70/2 70/5 78/17 83/13 85/5 91/11 179/7 188/21 reasonably [3] 14/14 143/8 143/14 reasons [6] 69/20 121/7 150/7 150/11 150/22 182/5 recall [71] 12/15 13/25 14/8 15/3 28/9 29/20 35/13 50/12 53/8 54/4 67/12 67/17 67/18 68/5 68/6 68/21 68/21 68/22 69/3 70/9 71/3 77/6 82/25 89/15 89/18 103/7 104/5 104/10 105/9 105/14 105/15 106/5 112/16 115/18 117/7 118/19 119/2 119/5 119/16 123/23 128/23 129/2 129/7 129/9 129/12 129/16 130/3 130/8 134/24 138/11 140/10	141/19 141/24 144/22 145/1 145/5 145/9 146/8 148/19 148/20 151/18 151/23 152/17 162/19 164/14 165/20 166/16 172/20 179/16 182/10 184/23 receipt [2] 87/5 149/12 receipts [5] 125/15 126/23 130/2 130/6 134/16 receive [3] 33/8 68/1 92/8 received [8] 9/11 59/5 81/23 102/15 121/16 143/19 155/15 196/8 receives [1] 31/18 receiving [3] 3/5 9/2 179/16 recent [5] 65/4 65/12 66/1 109/13 182/8 recently [5] 64/15 88/6 95/17 106/7 106/7 recognise [3] 29/6 110/24 158/10 recognised [1] 89/16 recollection [17] 2/9 37/24 51/22 67/12 68/9 69/15 82/24 88/5 88/5 93/17 93/19 116/17 122/4 138/7 142/20 179/2 193/1 recollections [1] 4/5 recommence [1] 73/18 recommended [1] 73/13 recommended/the [1] 73/13 recommend [2] 86/23 88/18 Recommendations [1] 186/25 record [7] 62/4 67/9 67/11 138/13 138/20 171/17 171/19 record' [1] 153/14 recorded [5] 94/16 129/15 138/9 139/9 139/20 recording [2] 127/22 170/3 records [2] 30/15 58/16 recourse [1] 136/5 recovery [1] 2/11 red [4] 30/24 31/1 31/1 31/5 redacted [1] 186/25 redress [3] 5/6 5/18 6/3
<b>Q</b>	QC [2] 87/1 192/11 qualifications [1] 6/8 qualified [2] 63/5 64/15 quality [1] 155/17 quasi [2] 116/16 118/24 quasi-litigation [1] 118/24 quasi-mediation [1] 116/16 queries [3] 29/18 31/11 136/3 question [46] 15/25 22/17 22/18 26/14 27/23 35/19 38/16 38/20 39/8 45/18 62/1 75/11 76/23 79/19 80/3 80/16 83/4 86/1 105/23 117/9 117/10 118/5 133/16 142/5 143/12 145/20 146/19 146/24 150/15 156/22 157/8 162/6 164/11 165/8 165/11 165/18 170/21 183/11 186/3 187/17 189/11 190/13 190/20 194/24 196/3 196/5 Questioned [2] 1/8 199/4 questioning [1] 197/2 questionnaire [2] 106/23 107/6	<b>R</b> rabbit [5] 182/2 182/3 182/24 183/18 184/2 raise [12] 92/25 115/9 137/11 146/25 147/4 165/9 168/16 168/22 170/1 171/13 171/15 195/10 raised [34] 34/21 37/25 38/1 65/20 65/23 91/19 91/23 102/5 102/19 108/9 110/7 110/19 110/19 119/20 122/3 125/5 137/4 138/8 141/19 142/18 145/4 147/9 148/22 149/23 153/14 164/18 165/6 170/20 171/14 171/22 172/22 175/3 185/20 187/24 raising [6] 14/20 18/3 29/25 151/18 182/17 182/22 range [5] 10/17 23/23 30/9 94/8 99/22 ranging [1] 6/23 rat [8] 47/20 47/21 47/23 48/1 48/10 48/16 49/2 49/6 rate [2] 36/7 41/1 rather [19] 2/23 21/9 28/11 37/12 41/15		

<b>R</b>	99/12 107/24 111/13 114/17 128/6 129/15 140/6 142/3 <b>relations [5]</b> 24/8 24/12 25/3 60/7 111/3 <b>relationship [2]</b> 63/3 70/10 <b>relatively [3]</b> 47/7 134/6 193/12 <b>relax [1]</b> 197/18 <b>relevance [2]</b> 81/19 132/19 <b>relevant [17]</b> 4/4 66/2 68/13 75/13 75/16 75/17 75/19 126/20 132/25 137/11 138/21 139/8 139/19 152/11 181/16 182/23 196/22 <b>reliability [5]</b> 37/9 37/19 109/5 144/1 146/6 <b>reliable [1]</b> 155/25 <b>reliance [1]</b> 147/13 <b>relitigating [2]</b> 107/9 110/15 <b>Reluctance [1]</b> 159/13 <b>rely [6]</b> 7/15 85/18 93/9 137/17 167/25 179/12 <b>relying [2]</b> 12/21 50/25 <b>remain [1]</b> 4/13 <b>remained [1]</b> 7/3 <b>remediated [1]</b> 45/5 <b>Remediation [10]</b> 4/16 4/17 4/21 4/25 5/2 5/5 9/13 10/11 10/12 10/20 <b>remedies [1]</b> 136/3 <b>remedy [1]</b> 33/17 <b>remember [26]</b> 10/3 33/19 38/5 50/10 52/24 59/9 77/3 77/23 77/24 77/24 78/7 103/24 105/17 105/25 106/24 115/15 117/18 128/17 133/24 134/22 157/15 163/4 164/9 166/17 185/12 185/24 <b>remembered [1]</b> 148/20 <b>remind [3]</b> 51/24 106/22 110/12 <b>remote [2]</b> 19/12 19/18 <b>remove [1]</b> 61/18 <b>removed [4]</b> 118/11 186/25 187/6 190/13 <b>removes [1]</b> 190/20 <b>removing [1]</b> 190/25 <b>repackaged [1]</b> 187/2 <b>repeat [2]</b> 40/16	54/10 <b>repeated [1]</b> 179/15 <b>repeating [1]</b> 136/9 <b>repetition [1]</b> 136/12 <b>rephrase [1]</b> 109/12 <b>replace [1]</b> 150/3 <b>replaced [1]</b> 193/20 <b>replied [2]</b> 30/5 194/12 <b>replies [2]</b> 43/19 53/14 <b>reply [20]</b> 30/18 30/21 32/15 35/24 42/6 47/12 50/2 51/3 56/14 68/2 68/5 68/11 68/20 71/8 86/21 91/3 91/18 95/13 107/5 186/10 <b>report [104]</b> 9/24 10/6 19/13 19/14 19/16 20/19 24/18 52/21 55/6 55/17 55/19 83/4 87/22 87/22 87/23 97/18 107/25 111/9 111/13 111/14 111/21 112/6 125/13 125/15 125/21 126/3 126/16 126/17 126/21 127/11 127/15 128/8 128/10 128/14 128/25 129/3 131/2 131/11 133/11 134/7 134/21 135/1 135/10 153/15 154/22 154/23 155/8 156/20 156/23 156/25 157/6 157/17 160/24 161/19 161/23 161/24 163/18 176/7 176/13 177/23 178/1 178/2 180/11 185/12 185/13 185/16 185/17 185/19 186/12 186/14 186/16 186/19 186/23 186/24 187/4 187/7 187/10 187/14 187/18 187/19 188/2 188/25 189/23 190/6 190/22 191/19 191/21 192/7 192/16 193/2 193/2 193/12 194/1 194/1 194/5 194/13 194/25 195/12 195/19 195/21 196/2 196/4 196/6 196/12 <b>Report' [1]</b> 191/15 <b>reported [6]</b> 9/25 10/1 10/7 124/3 180/23 180/25 <b>reporting [3]</b> 46/24 48/6 112/5 <b>reports [2]</b> 55/12 159/12 <b>reports' [1]</b> 181/12 <b>repository [2]</b> 135/25	138/18 <b>representative [3]</b> 65/13 105/2 137/23 <b>representatives [2]</b> 138/1 197/5 <b>reputation [1]</b> 112/25 <b>request [13]</b> 22/10 40/12 40/17 64/9 64/9 81/24 94/6 94/16 95/15 131/8 132/4 133/19 180/14 <b>requested [3]</b> 64/21 111/17 121/7 <b>requesting [1]</b> 61/18 <b>requests [8]</b> 34/18 77/18 95/16 95/21 117/24 129/20 178/13 180/4 <b>require [4]</b> 32/9 32/17 66/3 196/10 <b>required [10]</b> 24/1 32/13 83/17 94/17 121/13 151/12 151/12 183/21 189/15 192/21 <b>requirements [1]</b> 73/1 <b>requires [1]</b> 148/3 <b>research [6]</b> 31/13 31/15 32/8 32/16 33/5 33/9 <b>reserves [1]</b> 58/24 <b>resist [1]</b> 192/18 <b>resolution [4]</b> 9/19 22/21 71/17 153/23 <b>resolve [3]</b> 22/20 94/11 176/19 <b>resolved [4]</b> 74/13 79/15 153/5 156/10 <b>resources [1]</b> 107/13 <b>respect [12]</b> 23/25 44/23 48/25 51/4 51/25 79/7 96/20 108/15 108/16 122/20 133/24 196/18 <b>respond [11]</b> 18/4 22/10 26/20 48/8 87/12 88/14 88/19 88/24 91/12 91/15 178/13 <b>responded [2]</b> 60/24 65/19 <b>responding [1]</b> 89/2 <b>response [24]</b> 35/4 35/6 37/7 38/17 43/14 45/23 55/24 68/24 70/22 91/11 94/10 94/15 94/18 99/4 102/20 103/6 103/21 104/12 104/16 105/13 106/21 107/19 125/20 128/10 <b>responses [8]</b> 30/23 41/5 91/20 91/21 102/16 102/17 103/10	121/5 <b>responsibility [2]</b> 155/9 165/3 <b>responsible [8]</b> 11/23 23/20 25/9 26/11 26/13 56/22 57/1 58/3 <b>Responsive [1]</b> 177/11 <b>rest [2]</b> 168/14 170/6 <b>restrict [1]</b> 13/20 <b>result [5]</b> 84/16 85/2 90/22 149/12 166/6 <b>resulted [1]</b> 55/22 <b>resulting [1]</b> 11/8 <b>results [1]</b> 31/16 <b>retailer [1]</b> 174/4 <b>retain [1]</b> 138/20 <b>retainer [1]</b> 115/7 <b>retirement [1]</b> 36/13 <b>retribution [1]</b> 99/7 <b>returned [1]</b> 6/19 <b>revealed [4]</b> 50/3 116/9 160/24 165/3 <b>reveals [1]</b> 174/12 <b>revelatory [4]</b> 134/8 135/2 147/9 147/21 <b>reversal [1]</b> 186/3 <b>reversals [1]</b> 185/25 <b>revert [1]</b> 30/16 <b>review [59]</b> 2/23 56/3 58/10 61/4 65/12 72/12 74/2 74/4 74/5 74/24 76/24 85/14 94/14 101/20 101/21 102/1 102/3 102/4 103/15 104/22 106/1 106/2 107/19 111/16 111/21 112/8 117/21 121/4 121/8 122/20 122/24 123/14 123/19 124/2 124/8 124/10 124/14 124/21 124/23 124/25 125/1 125/8 125/11 150/8 150/12 155/13 156/11 159/17 169/7 174/2 176/15 182/19 185/1 185/4 185/22 185/23 192/12 192/18 193/24 <b>Review' [1]</b> 102/20 <b>reviewed [6]</b> 65/4 73/10 74/18 78/15 109/7 178/3 <b>reviewing [9]</b> 73/24 73/25 76/20 76/21 78/13 115/15 169/8 177/19 192/13 <b>reviews [12]</b> 23/23 32/2 101/19 103/11 103/15 103/21 104/13 115/16 115/19 122/7 124/15 137/10 <b>Reviews' [1]</b> 102/15
----------	--	---	---	--

<b>R</b>	111/2 117/20 121/8 128/8 130/24 <b>roll [1]</b> 32/5 <b>rollout [1]</b> 156/12 <b>rollover [1]</b> 174/9 <b>Ron [2]</b> 55/9 180/7 <b>room [2]</b> 104/4 180/17 <b>Rose [17]</b> 178/2 185/12 185/12 185/16 185/17 188/2 191/15 191/19 191/21 194/1 194/5 194/13 194/17 194/25 196/2 196/4 196/6 <b>Rose's [4]</b> 186/12 186/16 188/24 189/23 <b>round [1]</b> 64/23 <b>route [1]</b> 99/18 <b>routinely [2]</b> 139/8 139/20 <b>routing [1]</b> 121/22 <b>rule [3]</b> 22/10 81/24 99/10 <b>Rule 9 [2]</b> 22/10 81/24 <b>rules [1]</b> 156/14 <b>run [1]</b> 29/20 <b>run-up [1]</b> 29/20 <b>running [1]</b> 183/18 <b>ruthless [1]</b> 197/16	<b>Sandip [1]</b> 87/1 <b>sandwich [1]</b> 107/10 <b>sat [1]</b> 26/23 <b>satisfaction [1]</b> 45/4 <b>satisfied [1]</b> 31/13 <b>satisfy [2]</b> 82/3 101/4 <b>saw [14]</b> 9/6 9/6 26/3 40/24 42/5 45/12 87/16 92/23 97/15 103/17 128/22 142/6 149/20 191/1 <b>say [144]</b> 2/9 7/7 7/14 7/23 8/2 13/16 16/3 19/1 22/2 22/18 22/18 23/5 23/6 23/18 24/21 30/6 30/22 33/19 33/24 37/2 38/25 43/15 43/22 44/15 47/12 48/14 50/18 52/7 53/6 54/21 56/5 57/10 58/4 61/15 64/14 67/4 67/11 67/11 67/16 67/20 68/4 68/11 68/21 69/14 69/16 70/9 70/15 71/3 71/5 72/21 73/7 77/14 78/6 78/23 79/3 79/14 82/20 84/5 89/21 91/2 91/8 91/23 93/13 93/16 93/17 95/2 95/9 96/12 98/2 98/4 99/3 99/12 99/17 101/5 102/12 104/5 104/10 104/14 104/14 104/17 106/10 107/7 107/13 110/9 110/10 110/11 110/12 110/17 111/13 112/7 112/18 115/3 115/8 115/15 116/11 119/6 119/18 120/6 120/21 124/16 124/22 125/11 125/22 130/14 132/8 132/15 136/25 137/5 138/6 141/1 141/14 141/18 142/8 143/19 143/20 149/18 153/11 157/5 157/12 160/25 162/2 162/3 164/18 164/19 166/16 166/24 167/12 167/23 167/24 168/14 168/22 168/24 169/4 170/3 170/4 176/4 181/23 184/2 184/14 184/24 187/7 195/2 195/25 197/17 <b>saying [41]</b> 19/21 33/10 34/25 35/3 35/5 39/10 40/1 48/23 55/6 67/9 67/10 67/15 68/13 75/1 77/1 77/7 79/4 80/5 83/18 87/14 88/12 88/22 88/22 91/22 92/4 95/24	100/13 106/20 109/19 110/17 110/20 110/21 131/3 131/11 144/16 150/25 155/7 161/6 166/21 193/11 194/2 <b>says [44]</b> 29/15 39/15 43/7 43/12 46/21 50/1 55/3 55/19 61/3 61/11 64/13 64/20 66/25 67/3 67/7 71/2 71/14 74/21 79/11 79/17 80/2 84/7 90/12 94/8 94/22 122/19 126/15 126/19 128/3 131/25 133/11 135/16 135/21 154/16 154/18 159/3 163/21 169/21 171/6 180/1 188/16 195/7 195/17 196/9 <b>scale [1]</b> 33/25 <b>scan [2]</b> 90/10 114/8 <b>schedules [1]</b> 53/23 <b>scheme [15]</b> 36/17 42/9 56/3 58/11 97/3 97/4 97/7 99/8 107/2 108/1 108/5 117/6 172/11 174/2 176/19 <b>schemes [1]</b> 106/25 <b>scope [6]</b> 31/15 72/13 115/6 150/8 150/12 155/17 <b>Scott [7]</b> 2/3 120/23 121/6 122/13 122/18 125/8 136/18 <b>Scott's [2]</b> 120/25 124/24 <b>scratchcard [1]</b> 107/11 <b>screen [8]</b> 7/6 9/22 23/8 41/16 63/4 76/10 146/2 193/17 <b>screens [1]</b> 39/6 <b>scroll [39]</b> 30/22 31/7 41/20 42/4 42/5 43/15 46/21 47/2 47/7 47/9 49/22 50/1 53/14 54/25 55/3 55/25 56/4 56/13 61/2 63/17 65/8 65/10 94/4 94/7 94/21 99/3 99/17 101/16 101/18 102/8 159/22 173/25 177/12 179/21 179/22 180/22 181/19 191/13 192/24 <b>scrolling [2]</b> 56/4 162/5 <b>scrupulous [1]</b> 197/10 <b>scrutiny [2]</b> 58/18 124/25 <b>searched [1]</b> 67/22 <b>second [113]</b> 2/8 2/22 54/24 55/5 55/9	56/11 58/1 65/12 76/12 76/18 83/3 86/25 87/22 87/23 89/6 97/9 97/16 98/7 98/9 99/9 99/25 100/10 100/19 100/22 101/21 102/5 103/5 103/16 104/21 104/22 105/6 105/13 106/1 106/2 107/19 107/24 109/1 110/5 111/1 111/9 111/13 111/14 111/21 112/11 112/24 113/10 115/1 115/4 116/6 117/5 117/14 118/6 121/11 122/23 123/15 123/20 124/9 125/1 125/13 126/3 126/16 126/21 126/25 127/3 127/12 127/15 127/23 128/14 128/24 129/3 130/21 131/2 134/7 134/21 135/1 135/9 139/11 139/22 141/11 147/9 148/12 153/15 154/20 155/1 155/8 155/15 156/20 156/22 156/25 157/6 157/17 161/19 161/23 162/15 162/16 163/18 168/11 171/19 172/9 176/6 176/25 177/3 177/23 177/24 178/1 180/7 180/9 185/22 186/16 188/18 189/25 192/15 193/25 <b>secondhand [1]</b> 111/25 <b>secondly [3]</b> 2/8 67/1 99/8 <b>seconds [1]</b> 123/8 <b>section [6]</b> 61/13 177/12 180/13 180/21 187/1 194/11 <b>section 17 [1]</b> 177/12 <b>security [5]</b> 65/14 120/24 120/25 125/2 185/21 <b>see [102]</b> 1/3 12/6 23/10 27/20 29/10 29/22 30/4 36/4 38/17 41/21 41/23 42/4 42/6 44/24 45/19 46/16 47/4 47/9 47/12 47/14 49/22 50/1 50/7 50/17 52/19 54/25 55/1 56/13 60/2 63/20 65/8 72/8 74/15 74/24 76/8 76/24 77/20 78/15 82/12 83/25 84/1 85/12 86/1 86/8 89/23 92/5 93/23 94/6 96/8 100/23 101/15 106/11 106/19 111/7 111/14
----------	--	---	--	---

<p><b>S</b></p> <p><b>see... [47]</b> 112/20 113/22 114/2 114/5 114/7 114/8 114/9 115/3 115/16 119/19 119/22 122/14 123/24 124/1 126/8 128/3 128/20 128/21 133/21 135/8 135/13 136/18 139/2 141/11 142/17 147/16 147/17 151/24 152/25 153/9 154/15 155/3 158/17 163/15 171/16 172/3 173/16 173/19 178/24 179/22 179/23 180/9 183/13 186/10 193/12 195/7 197/22</p> <p><b>seeing [5]</b> 38/8 128/18 139/13 182/13 182/17</p> <p><b>seek [5]</b> 90/13 131/20 131/23 133/5 189/17</p> <p><b>seeking [4]</b> 2/11 121/23 148/2 176/4</p> <p><b>seeks [1]</b> 174/12</p> <p><b>seem [9]</b> 52/9 70/13 89/18 140/1 167/25 182/1 183/18 184/22 196/22</p> <p><b>Seema [12]</b> 83/12 83/21 87/19 90/9 90/14 96/7 128/16 129/1 129/4 129/18 130/7 175/11</p> <p><b>seemed [18]</b> 47/22 48/4 48/19 49/9 128/22 131/6 131/10 133/18 134/14 138/25 139/24 142/18 142/19 150/24 152/9 157/3 182/8 184/5</p> <p><b>seems [17]</b> 5/12 52/10 53/18 53/20 61/20 66/18 77/1 77/2 77/5 78/21 100/6 103/5 107/8 110/14 159/10 167/24 185/2</p> <p><b>seen [17]</b> 36/17 37/10 37/12 46/8 70/4 73/6 96/16 119/24 136/22 138/17 140/11 152/2 155/25 171/6 181/1 181/4 181/9</p> <p><b>segue [1]</b> 133/20</p> <p><b>selectively [1]</b> 101/2</p> <p><b>self [1]</b> 44/24</p> <p><b>self-reflection [1]</b> 44/24</p> <p><b>send [6]</b> 87/9 89/17 102/10 181/20 181/22 195/11</p>	<p><b>sending [4]</b> 42/4 46/17 81/5 186/7</p> <p><b>sends [5]</b> 86/6 86/10 94/8 101/18 192/7</p> <p><b>senior [10]</b> 6/2 13/3 13/21 58/15 62/18 62/21 62/24 120/24 127/9 134/6</p> <p><b>sense [17]</b> 8/22 36/18 66/13 72/21 85/8 89/10 119/10 119/11 120/16 124/14 124/20 131/1 134/5 134/25 135/5 165/17 181/15</p> <p><b>sensible [4]</b> 159/10 191/18 196/1 196/3</p> <p><b>sensitive [4]</b> 122/17 122/21 123/10 125/9</p> <p><b>sent [24]</b> 43/9 50/22 61/11 64/15 67/17 84/3 84/6 87/2 87/4 89/5 96/17 102/8 114/6 114/7 121/1 121/5 121/16 121/18 121/20 123/1 172/7 179/23 180/21 186/8</p> <p><b>sentence [12]</b> 2/3 3/9 7/8 19/15 20/18 56/6 56/16 56/17 56/24 57/9 57/16 188/19</p> <p><b>sentiments [1]</b> 43/3</p> <p><b>separate [4]</b> 5/12 5/14 5/15 5/17</p> <p><b>separated [1]</b> 190/12</p> <p><b>Separation [1]</b> 101/17</p> <p><b>September [3]</b> 58/14 61/3 158/8</p> <p><b>serial [1]</b> 88/3</p> <p><b>series [4]</b> 29/25 47/8 121/3 181/14</p> <p><b>serious [12]</b> 30/9 43/20 66/13 90/25 141/20 143/25 170/15 170/17 170/19 171/2 171/8 171/11</p> <p><b>seriously [4]</b> 65/22 88/25 152/10 156/3</p> <p><b>serve [1]</b> 195/19</p> <p><b>Service [1]</b> 31/22</p> <p><b>services [5]</b> 32/11 32/18 42/24 107/16 126/12</p> <p><b>set [19]</b> 24/14 51/3 57/14 72/10 99/4 105/18 107/14 108/7 114/22 137/1 137/25 140/12 151/25 153/3 153/24 153/25 155/3 174/1 176/15</p> <p><b>sets [4]</b> 43/10 47/3 102/18 189/23</p> <p><b>setting [7]</b> 4/3 25/9</p>	<p>26/11 26/14 29/19 39/23 97/9</p> <p><b>seven [1]</b> 126/6</p> <p><b>several [2]</b> 84/16 192/20</p> <p><b>Sewell [1]</b> 153/10</p> <p><b>shape [1]</b> 68/6</p> <p><b>share [8]</b> 14/9 59/11 69/8 86/13 88/12 89/25 160/1 163/1</p> <p><b>shared [7]</b> 14/10 134/1 137/16 160/2 163/8 178/5 178/11</p> <p><b>sharing [2]</b> 115/16 163/2</p> <p><b>she [15]</b> 46/21 47/3 50/1 50/13 52/19 53/14 53/16 64/13 90/15 90/18 175/11 179/25 186/18 186/18 190/9</p> <p><b>sheet [2]</b> 1/18 167/1</p> <p><b>shifting [1]</b> 30/10</p> <p><b>short [7]</b> 59/25 91/11 113/20 150/2 152/23 183/2 196/11</p> <p><b>shortfall [2]</b> 174/12 174/13</p> <p><b>shortfalls [2]</b> 16/17 100/24</p> <p><b>shorthand [1]</b> 113/7</p> <p><b>shortly [5]</b> 11/2 24/3 28/24 30/16 87/8</p> <p><b>shot [1]</b> 154/12</p> <p><b>should [59]</b> 2/4 12/22 18/6 27/24 41/12 50/6 50/9 54/7 54/12 57/5 61/13 61/23 64/14 65/14 66/22 67/1 67/5 67/15 70/22 71/7 71/8 74/2 78/25 84/5 86/13 86/22 87/12 88/12 88/18 88/24 92/7 94/10 94/13 94/15 96/25 97/24 102/24 105/19 105/21 106/3 118/8 118/23 123/5 123/11 137/6 142/8 144/24 145/11 149/17 149/19 153/25 159/12 168/25 170/1 179/17 183/15 183/19 184/19 186/25</p> <p><b>shouldn't [6]</b> 51/23 68/13 68/14 68/15 79/22 197/20</p> <p><b>show [10]</b> 29/20 31/4 36/11 39/25 40/3 45/1 46/19 53/8 65/21 179/10</p> <p><b>showing [1]</b> 53/23</p> <p><b>shown [2]</b> 158/9 177/1</p> <p><b>shows [6]</b> 38/12</p>	<p>38/21 45/16 66/20 82/6 107/11</p> <p><b>shred [1]</b> 124/4</p> <p><b>shredded [2]</b> 124/11 124/12</p> <p><b>shredding [3]</b> 124/3 124/4 197/2</p> <p><b>Shropshire [3]</b> 55/2 56/10 56/15</p> <p><b>shut [1]</b> 91/22</p> <p><b>side [12]</b> 25/14 37/1 74/23 81/5 96/16 140/9 161/2 162/1 164/5 165/21 168/4 173/20</p> <p><b>sided [2]</b> 52/13 84/16</p> <p><b>siege [1]</b> 183/22</p> <p><b>sift [2]</b> 176/15 193/24</p> <p><b>sifts [1]</b> 192/20</p> <p><b>Sight [86]</b> 55/5 55/9 55/11 56/12 58/1 65/12 83/3 86/25 87/22 97/9 97/16 98/10 99/9 99/25 100/10 100/19 100/22 102/6 103/5 103/16 104/21 104/22 105/6 105/13 106/1 106/2 107/19 111/2 111/9 111/13 111/21 112/11 112/24 115/1 115/4 116/6 117/14 118/6 122/23 123/16 123/21 124/9 125/1 125/13 126/3 126/16 126/21 127/3 127/12 127/15 127/24 128/14 128/24 129/3 131/2 134/21 135/1 135/9 147/9 148/12 154/21 155/1 155/16 156/20 156/23 156/25 157/6 157/17 161/19 161/23 162/15 162/16 163/18 168/11 171/19 172/9 176/6 176/25 177/3 177/23 177/24 178/1 180/7 180/10 192/15 194/1</p> <p><b>Sight's [11]</b> 98/7 101/21 107/24 111/14 113/11 117/5 130/22 134/7 153/15 155/8 185/22</p> <p><b>Sight/JFSA [1]</b> 99/25</p> <p><b>sign [5]</b> 42/23 168/9 171/17 180/18 193/8</p> <p><b>signature [1]</b> 1/21</p> <p><b>signed [2]</b> 83/25 168/5</p> <p><b>significant [2]</b> 4/8 149/6</p> <p><b>significantly [1]</b> 156/3</p> <p><b>silos [3]</b> 138/10</p>	<p>140/4 140/24</p> <p><b>similar [4]</b> 84/22 84/24 96/2 106/7</p> <p><b>Simon [9]</b> 83/1 103/18 121/1 125/19 149/13 153/10 158/15 166/11 178/8</p> <p><b>Simon Baker [3]</b> 83/1 103/18 121/1</p> <p><b>Simon Clarke [1]</b> 166/11</p> <p><b>simple [2]</b> 76/23 190/24</p> <p><b>simpler [1]</b> 57/8</p> <p><b>simply [5]</b> 8/8 81/4 91/22 121/18 135/3</p> <p><b>since [15]</b> 5/3 6/1 7/2 50/22 51/17 64/22 64/24 66/2 132/1 156/12 167/16 167/18 167/18 168/1 174/22</p> <p><b>sincerely [1]</b> 82/9</p> <p><b>Singh [10]</b> 13/10 14/2 15/17 127/18 127/22 128/15 128/25 129/24 136/20 151/13</p> <p><b>Singh's [1]</b> 15/23</p> <p><b>single [2]</b> 135/24 136/5</p> <p><b>sir [27]</b> 1/3 28/18 29/2 41/12 41/19 43/20 46/10 59/20 60/2 71/6 80/25 81/8 81/14 81/21 82/10 82/14 113/13 113/22 114/17 152/18 152/21 152/25 197/1 197/8 197/21 197/23 197/24</p> <p><b>sits [1]</b> 88/3</p> <p><b>sitting [7]</b> 58/4 62/22 71/5 84/14 116/18 140/18 196/21</p> <p><b>situation [2]</b> 136/9 136/10</p> <p><b>six [4]</b> 28/22 155/3 160/9 160/13</p> <p><b>size [1]</b> 68/6</p> <p><b>skip [1]</b> 35/17</p> <p><b>skipped [1]</b> 141/11</p> <p><b>slightly [1]</b> 89/18</p> <p><b>slip [1]</b> 19/22</p> <p><b>slot [1]</b> 197/6</p> <p><b>small [5]</b> 38/1 38/1 38/8 56/19 193/12</p> <p><b>smell [2]</b> 47/20 48/16</p> <p><b>smelled [1]</b> 47/21</p> <p><b>smelling [3]</b> 47/23 49/2 49/6</p> <p><b>smelt [1]</b> 48/1</p> <p><b>smiley [1]</b> 43/21</p> <p><b>Smith [21]</b> 127/6 127/8 127/10 158/16 161/8 163/10 163/12 163/16 163/21 164/19</p>
--	---	---	--	---

<p><b>S</b></p> <p><b>Smith... [11]</b> 164/22 165/22 166/7 168/17 170/2 171/12 185/11 186/7 187/10 188/8 188/16</p> <p><b>so [208]</b></p> <p><b>society [1]</b> 120/18</p> <p><b>software [1]</b> 176/9</p> <p><b>sole [1]</b> 108/10</p> <p><b>solely [1]</b> 148/23</p> <p><b>solicitor [6]</b> 6/9 6/16 53/10 63/8 63/19 64/8</p> <p><b>solicitors [9]</b> 52/18 52/20 66/16 70/11 70/16 82/6 186/9 186/23 192/20</p> <p><b>some [84]</b> 1/23 3/18 4/8 7/13 11/7 18/18 18/19 23/10 24/13 26/2 27/3 28/11 35/18 40/12 40/12 40/18 40/18 40/18 41/4 42/20 43/17 44/24 53/1 55/21 56/1 59/11 65/3 65/24 66/10 69/6 72/19 73/19 76/15 81/25 82/21 89/25 93/13 95/11 98/5 101/19 104/1 108/1 108/6 110/18 113/3 114/17 114/20 119/6 122/5 123/9 124/6 124/11 125/5 127/16 127/17 129/14 130/17 131/7 131/12 131/14 131/16 131/19 131/22 142/11 143/24 147/20 151/7 164/7 167/2 174/22 175/25 176/7 177/25 178/1 178/17 179/4 180/4 181/9 183/10 191/1 192/7 193/15 193/20 195/15</p> <p><b>somebody [13]</b> 22/3 47/23 63/14 63/25 77/10 124/24 133/22 140/1 146/21 147/16 147/17 158/14 188/10</p> <p><b>someone [3]</b> 107/15 137/6 187/6</p> <p><b>something [51]</b> 9/4 15/7 15/13 18/15 19/3 26/3 28/7 28/15 28/21 28/24 34/25 36/21 43/1 48/2 49/14 50/12 52/17 52/19 54/16 63/23 69/13 71/4 75/18 78/15 78/17 80/20 87/8 88/17 93/7 95/10 100/20 109/23 112/21 118/25 125/5 139/17 139/24 141/11</p>	<p>142/10 148/12 148/20 158/4 166/22 167/7 170/4 179/3 183/16 184/1 196/7 196/13 196/17</p> <p><b>sometime [1]</b> 83/15</p> <p><b>sometimes [6]</b> 8/6 44/7 82/22 118/21 121/8 125/17</p> <p><b>somewhere [2]</b> 103/17 131/25</p> <p><b>soon [5]</b> 22/22 28/16 78/14 85/1 111/15</p> <p><b>sooner [2]</b> 84/3 85/23</p> <p><b>sophistry [2]</b> 28/5 28/12</p> <p><b>sorry [146]</b> 4/23 5/23 5/24 8/16 8/17 10/3 10/17 12/7 15/10 15/14 15/25 16/2 16/20 19/23 19/24 20/1 21/1 22/3 22/11 22/24 23/4 26/15 26/25 27/8 27/19 27/21 27/21 27/22 28/10 29/6 33/22 33/24 37/24 38/6 39/2 39/6 39/10 40/16 40/16 41/7 44/9 45/9 46/1 46/3 46/5 46/8 48/18 48/23 48/25 49/3 49/18 49/20 49/21 50/21 51/16 52/7 52/9 52/12 52/14 54/10 57/13 64/4 75/1 75/10 75/10 75/20 78/7 79/19 80/2 80/3 88/1 88/5 89/13 89/22 89/23 89/24 93/20 93/23 97/22 97/23 98/3 98/18 98/20 98/20 100/13 100/15 105/23 105/24 106/4 106/5 106/7 109/12 110/3 110/12 112/5 117/7 117/8 117/8 117/16 117/24 120/5 120/12 123/17 123/17 123/24 124/1 124/13 133/10 134/24 139/10 139/10 139/12 142/15 143/1 143/11 144/13 145/19 146/17 146/20 146/22 149/11 151/12 151/21 156/22 157/8 158/25 159/1 159/15 162/3 163/16 163/17 165/11 165/12 166/3 168/3 169/13 169/16 170/5 170/21 173/9 173/15 185/8 192/3 194/10 194/10 194/20</p> <p><b>sort [25]</b> 15/8 23/4</p>	<p>51/17 77/4 77/14 77/22 88/2 95/21 101/25 107/3 111/22 111/25 116/15 116/18 119/16 122/2 124/15 142/5 148/9 163/19 163/20 172/23 181/9 190/20 193/12</p> <p><b>sorts [1]</b> 195/10</p> <p><b>sought [4]</b> 16/14 97/3 97/4 115/18</p> <p><b>sound [2]</b> 42/14 42/15</p> <p><b>sound' [1]</b> 192/17</p> <p><b>sounds [2]</b> 77/20 92/21</p> <p><b>source [2]</b> 84/20 100/24</p> <p><b>sources [5]</b> 9/3 31/20 31/22 45/22 136/1</p> <p><b>space [1]</b> 14/11</p> <p><b>spaces [1]</b> 17/22</p> <p><b>speak [9]</b> 17/10 18/14 23/1 26/25 54/2 62/21 62/23 135/4 152/15</p> <p><b>speaking [8]</b> 33/11 36/18 36/22 163/15 168/17 171/5 173/16 173/23</p> <p><b>specialised [1]</b> 63/11</p> <p><b>specialist [1]</b> 13/8</p> <p><b>specialists [1]</b> 140/7</p> <p><b>specific [8]</b> 18/25 20/1 34/20 88/14 101/22 102/5 110/7 145/17</p> <p><b>specifically [6]</b> 4/15 12/15 108/25 128/24 165/8 195/19</p> <p><b>specifics [1]</b> 78/8</p> <p><b>speculating [2]</b> 161/12 173/9</p> <p><b>speculation [1]</b> 127/14</p> <p><b>spend [1]</b> 194/19</p> <p><b>SPMRs [1]</b> 39/11</p> <p><b>spoke [1]</b> 19/18</p> <p><b>spoken [1]</b> 55/9</p> <p><b>spot [17]</b> 101/19 101/19 101/21 102/1 102/3 102/4 103/10 103/15 103/21 104/13 115/15 115/19 121/4 122/7 137/10 185/22 185/23</p> <p><b>spreadsheet [1]</b> 180/9</p> <p><b>spring [1]</b> 101/15</p> <p><b>spun [1]</b> 65/21</p> <p><b>square [10]</b> 82/22 125/17 127/4 129/5 130/19 134/12 134/13 181/7 194/7 194/15</p>	<p><b>Square/Falkirk [2]</b> 134/12 181/7</p> <p><b>squiggle [1]</b> 161/2</p> <p><b>SRA's [1]</b> 7/3</p> <p><b>SS [2]</b> 161/24 168/7</p> <p><b>stable [1]</b> 36/14</p> <p><b>Staff [2]</b> 191/10 191/20</p> <p><b>stage [6]</b> 62/6 69/22 75/5 101/6 105/11 177/18</p> <p><b>stages [1]</b> 69/3</p> <p><b>stakeholder [2]</b> 118/16 118/18</p> <p><b>stall [3]</b> 57/14 107/14 108/8</p> <p><b>stand [2]</b> 146/23 184/21</p> <p><b>standalone [3]</b> 102/18 190/8 190/11</p> <p><b>standard [1]</b> 39/24</p> <p><b>standards [2]</b> 118/23 119/7</p> <p><b>Star [3]</b> 55/2 56/10 56/15</p> <p><b>start [14]</b> 4/10 23/12 27/6 29/4 49/17 90/5 94/4 97/19 108/6 111/6 181/24 181/25 184/13 197/1</p> <p><b>started [14]</b> 28/25 88/10 97/13 108/5 131/17 147/5 167/12 174/23 175/4 176/1 176/4 183/9 183/9 193/10</p> <p><b>starting [1]</b> 30/12</p> <p><b>starts [1]</b> 29/19</p> <p><b>state [3]</b> 20/5 65/14 177/5</p> <p><b>statement [52]</b> 1/15 1/16 3/23 3/25 4/1 4/7 7/7 9/21 9/22 12/24 15/14 18/21 19/10 19/11 20/4 20/21 20/23 21/23 22/4 22/16 23/16 34/23 35/9 35/20 35/22 35/23 35/25 39/18 40/13 40/19 46/14 56/9 65/17 67/12 77/6 82/18 87/17 94/1 97/20 100/12 103/3 103/17 107/21 115/2 119/19 120/21 128/5 130/13 138/3 141/13 162/17 185/6</p> <p><b>statements [12]</b> 14/13 23/24 57/6 160/9 160/10 160/13 161/25 162/2 168/6 168/9 171/18 177/8</p> <p><b>stating [1]</b> 33/3</p> <p><b>statistics [1]</b> 45/1</p>	<p><b>status [5]</b> 118/2 118/7 118/14 128/17 187/13</p> <p><b>statutory [1]</b> 184/19</p> <p><b>staying [1]</b> 37/13</p> <p><b>step [3]</b> 18/17 107/8 110/14</p> <p><b>steps [7]</b> 88/10 140/3 146/25 149/19 150/20 151/2 165/7</p> <p><b>Stevens [1]</b> 179/19</p> <p><b>stick [1]</b> 183/19</p> <p><b>still [17]</b> 10/15 36/13 38/4 46/9 47/7 53/2 53/22 71/23 100/4 141/1 143/18 165/11 177/4 180/20 183/14 184/14 185/1</p> <p><b>stock [1]</b> 65/19</p> <p><b>stolen [1]</b> 16/15</p> <p><b>stop [1]</b> 85/17</p> <p><b>stopped [2]</b> 12/9 12/20</p> <p><b>story [6]</b> 25/14 30/11 45/18 53/22 55/5 55/7</p> <p><b>straight [10]</b> 49/20 87/13 88/19 88/23 89/1 89/2 89/6 89/11 89/13 90/17</p> <p><b>strand [2]</b> 41/1 109/4</p> <p><b>strategy [24]</b> 24/16 25/2 25/8 25/9 25/18 25/21 25/23 25/25 26/2 26/6 26/12 26/14 26/17 26/23 27/2 27/10 27/14 27/17 27/25 34/24 35/8 37/23 105/12 115/24</p> <p><b>straws [1]</b> 42/19</p> <p><b>Street [3]</b> 42/22 102/14 104/8</p> <p><b>strength [1]</b> 57/16</p> <p><b>strengthen [1]</b> 103/20</p> <p><b>stress [1]</b> 27/5</p> <p><b>stressed [1]</b> 72/22</p> <p><b>strict [1]</b> 18/11</p> <p><b>strike [1]</b> 193/19</p> <p><b>strong [1]</b> 192/18</p> <p><b>struck [2]</b> 34/17 95/25</p> <p><b>structural [1]</b> 101/6</p> <p><b>struggled [1]</b> 63/24</p> <p><b>struggling [6]</b> 8/16 16/20 27/8 28/10 77/11 139/10</p> <p><b>stuff [1]</b> 92/8</p> <p><b>style [1]</b> 96/2</p> <p><b>subject [12]</b> 8/25 46/25 65/13 84/2 106/8 108/12 122/17 122/23 124/9 136/20 138/20 192/13</p> <p><b>submitted [1]</b> 99/22</p>
---	--	--	---	---

<b>S</b>	18/25 21/17 101/19 185/15	<b>suspension [3]</b> 11/14 11/21 12/9	104/12 110/25 125/23 140/3 141/17 141/22	132/22 174/15	
<b>subpostmaster [6]</b> 18/3 43/9 84/21 85/22 86/2 90/23	<b>summarised [5]</b> 8/12 127/10 136/23 175/15 176/20	<b>swapped [1]</b> 67/25	144/18 146/25 147/24 148/6 148/14 149/19	<b>terms [8]</b> 6/8 9/12 18/19 86/24 118/8 119/10 144/1 168/23	
<b>subpostmasters [45]</b> 5/7 6/3 10/15 11/11 11/15 11/19 11/21 14/15 14/20 16/14 17/2 18/12 20/22 21/10 21/11 31/14 32/19 33/15 34/4 34/13 35/21 36/1 36/19 36/24 37/10 37/19 38/13 38/21 39/19 40/14 40/20 42/20 44/4 44/18 44/25 45/17 51/14 54/19 82/16 84/13 85/4 96/11 100/1 155/20 175/15	<b>summarising [3]</b> 8/1 66/21 135/20	<b>swear [1]</b> 43/16	150/18 155/7 157/4 164/25 166/20 167/10 196/18	<b>terribly [1]</b> 118/10	
<b>subpostmasters' [2]</b> 100/9 132/20	<b>summary [7]</b> 5/11 18/21 18/24 47/3 47/8 52/1 196/11	<b>Swepson [2]</b> 101/16 102/9	<b>synthesise [3]</b> 7/9 8/8 78/1	<b>test [4]</b> 74/25 76/25 185/1 189/11	
<b>subsequent [2]</b> 90/24 184/16	<b>summer [1]</b> 64/7	<b>sworn [2]</b> 1/7 199/2	<b>synthesising [1]</b> 79/5	<b>testing [2]</b> 183/13 184/14	
<b>subsequently [1]</b> 141/6	<b>sunny [1]</b> 53/22	<b>system [51]</b> 8/20 31/14 32/5 32/9 32/14 32/16 32/23 32/25 33/2 33/25 36/16 36/19 37/6 37/14 37/16 42/20 43/5 44/19 45/13 48/7 55/7 55/21 56/22 57/1 58/3 65/16 78/18 84/17 109/6 114/23 126/12 129/14 137/17 143/9 143/14 143/20 144/2 144/3 146/5 146/7 151/11 154/24 154/25 156/1 164/1 169/25 174/18 176/9 185/25 186/4 188/12	<b>takes [1]</b> 123/7	<b>text [16]</b> 31/1 31/6 35/18 55/3 56/14 72/19 95/11 123/12 137/13 150/3 192/7 192/10 193/17 194/8 194/17 194/18	
<b>substance [5]</b> 23/9 30/16 57/17 160/12 160/14	<b>support [10]</b> 12/1 23/23 24/1 41/2 60/22 74/11 99/23 104/1 137/16 155/18	<b>system' [2]</b> 55/14 95/18	<b>talking [14]</b> 8/5 14/25 17/25 18/1 20/13 50/13 59/9 62/5 75/6 75/7 75/8 81/2 172/1 172/17	<b>than [32]</b> 2/23 4/18 20/17 21/10 28/11 28/17 41/1 41/15 42/25 43/13 43/17 47/2 57/17 63/15 65/17 68/8 78/17 81/2 85/23 89/11 90/18 91/11 101/7 108/8 118/19 120/3 138/19 139/6 139/17 167/4 183/24 185/19	
<b>substantial [1]</b> 4/2	<b>supported [3]</b> 25/23 77/2 83/7	<b>system-wide [1]</b> 154/24	<b>task [1]</b> 8/3	<b>task [1]</b> 8/3	
<b>substantiated [1]</b> 57/6	<b>supporting [1]</b> 103/14	<b>system-wide/systemi c [1]</b> 176/9	<b>tasks [1]</b> 98/5	<b>team [26]</b> 5/16 11/24 11/25 16/13 17/9 17/11 17/20 17/22 17/23 18/2 18/4 23/19 23/22 24/9 25/24 42/11 49/23 73/13 103/13 109/8 109/16 111/3 119/1 130/7 149/7 185/21	<b>thank [88]</b> 1/4 1/5 1/13 1/23 2/1 2/7 2/20 3/15 3/17 3/25 9/23 23/7 27/19 28/18 29/9 29/22 41/11 41/18 42/3 42/15 43/20 46/1 46/8 46/9 46/9 46/15 46/22 49/20 49/21 52/3 52/5 58/9 59/8 59/19 59/22 59/23 60/4 60/5 60/8 60/10 71/12 71/22 72/6 80/17 82/11 82/13 82/14 91/2 94/3 94/5 96/9 96/19 97/22 98/3 98/16 99/17 101/14 102/8 106/18 113/18 113/23 114/16 114/24 117/16 122/13 135/12 138/5 138/16 143/3 143/4 146/2 146/24 152/18 152/21 153/1 153/2 154/9 154/9 158/23 159/2 161/23 179/20 181/20 186/2 192/5 196/24 197/23 197/24
<b>substantive [2]</b> 3/21 30/23	<b>supportive [1]</b> 154/2	<b>system-wide [1]</b> 154/24	<b>teams [3]</b> 72/23 137/24 192/16	<b>technical [3]</b> 118/2 140/7 185/24	
<b>success [2]</b> 37/9 155/23	<b>suppose [1]</b> 104/14	<b>systemic [3]</b> 55/14 55/17 176/9	<b>technically [2]</b> 160/11 160/13	<b>technically [2]</b> 160/11 160/13	
<b>successful [3]</b> 36/3 38/3 99/14	<b>supposed [1]</b> 175/22	<b>systems [2]</b> 39/13 99/20	<b>Telegraph [1]</b> 55/8	<b>Telephone [2]</b> 160/22 161/7	
<b>successfully [1]</b> 45/5	<b>suppress [4]</b> 65/25 66/23 67/15 68/13	<b>T</b>	<b>telephoned [1]</b> 127/7	<b>tell [21]</b> 8/15 10/24 16/12 25/14 25/25 26/19 31/5 85/18 93/3 108/16 108/18 128/6 129/3 129/13 129/17 129/24 148/13 163/24 166/21 178/16 188/14	
<b>such [6]</b> 65/2 66/12 70/10 133/6 164/17 188/20	<b>suppressed [1]</b> 67/5	<b>tab [15]</b> 41/14 46/3 46/6 49/16 54/23 58/6 98/13 101/12 106/17 122/12 143/1 173/11 185/10 192/1 192/2	<b>teams [3]</b> 72/23 137/24 192/16	<b>telling [10]</b> 53/10 81/17 82/5 84/10 166/4 166/10 168/7 168/10 170/2 197/9	
<b>suffering [1]</b> 90/14	<b>suppressing [1]</b> 69/18	<b>tab E65 [1]</b> 58/6	<b>technical [3]</b> 118/2 140/7 185/24	<b>tells [2]</b> 161/24 162/15	
<b>suffers [1]</b> 90/18	<b>suppression [2]</b> 67/1 70/12	<b>tainted [4]</b> 132/13 133/2 146/15 163/7	<b>teams [3]</b> 72/23 137/24 192/16	<b>tended [1]</b> 178/13	
<b>sufficient [2]</b> 12/3 92/10	<b>sure [36]</b> 4/23 11/5 19/5 20/1 26/25 39/13 43/13 52/15 54/5 56/10 57/5 57/19 57/21 72/25 75/1 78/19 78/19 87/3 92/5 93/1 103/2 103/2 113/2 113/3 116/19 117/10 124/18 124/20 137/22 149/19 157/8 171/9 182/9 184/7 187/16 197/19	<b>take [38]</b> 4/8 18/17 23/8 43/20 58/22 64/18 68/23 69/1 72/12 78/11 78/22 86/9 88/10 92/11 93/5 93/13 101/11 105/5 105/6 107/13 109/24 110/2 116/3 116/4 122/8 126/14 126/17 139/1 144/12 146/21 165/7 165/13 166/19 167/7 177/9 183/11 192/23 195/15	<b>teams [3]</b> 72/23 137/24 192/16	<b>tends [1]</b> 33/23	
<b>suggest [7]</b> 30/12 33/23 36/15 79/20 86/19 148/12 188/20	<b>surface [2]</b> 134/20 134/22	<b>taken [29]</b> 25/10 35/15 35/16 45/23 49/12 50/9 76/16 80/23 92/15 93/17	<b>teams [3]</b> 72/23 137/24 192/16	<b>tenor [1]</b> 103/25	
<b>suggested [4]</b> 78/21 79/20 97/15 193/15	<b>surfacing [1]</b> 136/13		<b>teams [3]</b> 72/23 137/24 192/16	<b>tens [2]</b> 31/19 32/24	
<b>suggesting [1]</b> 76/23	<b>surprising [1]</b> 140/2		<b>teams [3]</b> 72/23 137/24 192/16	<b>term [3]</b> 51/7 51/10 55/15	
<b>suggestion [5]</b> 100/2 124/4 156/1 175/8 175/12	<b>surveys [2]</b> 44/25 45/16		<b>teams [3]</b> 72/23 137/24 192/16	<b>terminals [1]</b> 32/25	
<b>suggestions [2]</b> 87/18 100/17	<b>Susan [4]</b> 61/12 111/9 123/4 153/10		<b>teams [3]</b> 72/23 137/24 192/16	<b>Terminate [1]</b> 189/22	
<b>suggests [1]</b> 5/5	<b>suspect [4]</b> 76/1 102/24 124/18 149/16		<b>teams [3]</b> 72/23 137/24 192/16	<b>terminated [2]</b> 132/21 133/15	
<b>suing [2]</b> 112/11 112/19	<b>suspected [1]</b> 174/16		<b>teams [3]</b> 72/23 137/24 192/16	<b>termination [2]</b>	
<b>suitability [3]</b> 15/23 16/9 176/15	<b>suspend [2]</b> 12/4 174/14		<b>teams [3]</b> 72/23 137/24 192/16		
<b>summarise [5]</b> 8/21	<b>suspended [2]</b> 11/11 12/22		<b>teams [3]</b> 72/23 137/24 192/16		
	<b>suspending [2]</b> 11/19 12/21		<b>teams [3]</b> 72/23 137/24 192/16		
	<b>suspense [5]</b> 125/16 127/1 130/15 130/20 134/18		<b>teams [3]</b> 72/23 137/24 192/16		

<b>T</b>	18/4 20/14 21/12 21/14 24/17 29/19 30/7 32/9 32/17 34/3 41/16 43/3 51/25 61/23 64/21 69/24 73/25 74/1 74/3 74/18 74/19 75/5 75/14 76/9 76/20 76/21 76/21 76/22 78/14 78/25 79/8 79/13 79/24 81/6 81/13 81/19 83/13 88/20 88/21 89/5 89/12 92/5 96/20 101/24 105/10 108/2 109/5 115/21 115/22 116/24 133/12 136/14 137/21 137/25 138/9 140/8 150/19 151/15 153/15 153/23 168/25 171/19 179/10 179/10 179/11 179/13 180/16 180/20 183/5 183/6 183/21 184/17 194/3	180/3 180/22 186/9 188/18 189/16 189/23 190/5 191/4 191/17 192/24 193/7 193/15 193/22 195/14 195/23 196/16 196/19	147/15 153/9 174/7 174/10 183/25 188/18	<b>they'll [2]</b> 146/23 168/24 <b>they're [10]</b> 17/12 17/15 17/19 35/12 40/22 52/13 117/17 181/8 182/2 184/2 <b>they've [3]</b> 44/19 54/8 181/25 <b>thick [1]</b> 80/3 <b>thing [18]</b> 9/7 19/4 19/9 19/20 44/18 45/7 68/8 75/2 77/4 93/21 119/14 134/22 142/9 175/16 181/8 181/13 185/2 197/11 <b>things [27]</b> 14/1 17/22 19/8 20/2 22/8 22/17 35/14 37/21 68/18 78/4 93/5 96/16 103/19 105/1 109/25 118/9 125/20 141/2 147/15 162/16 163/12 179/4 184/6 185/4 195/20 195/21 196/12 <b>think [370]</b> <b>thinking [13]</b> 13/18 15/4 26/1 33/14 51/18 78/20 112/19 117/7 181/7 181/24 183/15 184/13 196/21 <b>thinks [2]</b> 94/23 170/2 <b>third [13]</b> 3/11 21/1 39/7 40/5 49/5 67/4 90/11 99/24 107/6 110/13 115/10 138/6 197/12 <b>thirdly [1]</b> 104/2 <b>this [328]</b> <b>Thomas [3]</b> 50/9 50/18 60/16 <b>Thomson [1]</b> 62/5 <b>thorough [1]</b> 185/23 <b>those [48]</b> 1/24 3/18 3/20 3/21 36/12 37/13 45/3 45/4 49/14 59/13 62/8 62/16 63/9 68/18 74/20 75/13 78/5 83/16 87/2 92/2 92/3 92/4 92/11 101/25 117/13 118/1 118/14 119/10 119/22 126/17 130/18 131/21 132/7 132/14 133/7 134/19 136/4 136/13 141/22 151/3 152/10 157/7 165/6 178/17 178/18 185/15 194/16 196/25 <b>though [8]</b> 11/5 13/19 14/7 32/3 108/25 134/7 144/11 171/18 <b>thought [35]</b> 5/12 5/16 12/6 15/5 15/9	
<b>that's...</b> [152] 24/10 26/14 27/17 27/21 28/9 28/13 29/2 33/3 33/16 33/18 33/23 34/12 36/10 39/8 39/14 39/25 40/5 40/23 43/8 45/7 45/9 45/10 45/17 45/23 48/13 48/25 49/16 50/12 51/11 51/22 52/2 52/4 54/16 54/22 56/18 58/4 59/20 60/9 61/11 62/8 62/9 63/2 63/16 64/6 64/18 66/18 66/20 66/25 67/3 67/7 68/10 69/15 70/2 70/4 70/23 70/24 71/1 71/23 74/21 75/22 76/2 76/3 76/16 77/1 77/4 78/16 79/7 79/17 80/2 80/4 80/12 80/25 81/8 81/8 82/11 82/12 83/23 88/22 88/25 89/10 90/5 90/14 93/11 93/11 93/19 93/20 93/22 94/21 95/13 96/7 97/15 98/13 100/15 101/12 103/24 106/14 106/17 106/23 107/23 108/18 110/6 111/5 112/7 112/19 113/17 119/14 119/20 119/21 120/5 120/25 124/22 125/3 125/7 125/25 126/23 126/25 128/3 133/3 133/23 135/11 142/9 143/22 152/18 160/23 161/22 162/10 162/12 163/3 163/11 163/25 166/24 167/20 167/20 176/2 176/5 178/18 179/1 181/21 182/10 183/2 183/11 183/16 183/25 184/1 188/6 189/4 189/17 192/3 193/13 193/19 195/22 197/8	18/4 20/14 21/12 21/14 24/17 29/19 30/7 32/9 32/17 34/3 41/16 43/3 51/25 61/23 64/21 69/24 73/25 74/1 74/3 74/18 74/19 75/5 75/14 76/9 76/20 76/21 76/21 76/22 78/14 78/25 79/8 79/13 79/24 81/6 81/13 81/19 83/13 88/20 88/21 89/5 89/12 92/5 96/20 101/24 105/10 108/2 109/5 115/21 115/22 116/24 133/12 136/14 137/21 137/25 138/9 140/8 150/19 151/15 153/15 153/23 168/25 171/19 179/10 179/10 179/11 179/13 180/16 180/20 183/5 183/6 183/21 184/17 194/3	<b>there [156]</b> 1/23 3/18 3/20 4/20 4/22 5/23 11/3 12/3 13/8 15/12 16/18 16/19 17/2 17/3 17/23 22/25 24/11 24/12 31/4 35/22 37/24 37/24 39/13 39/21 40/1 40/24 43/2 44/23 45/3 45/3 45/10 45/12 45/20 47/7 47/15 48/6 49/13 51/12 54/18 55/13 55/17 55/19 56/14 56/18 58/13 59/8 62/4 62/18 65/9 67/10 68/22 70/4 71/7 72/3 74/16 74/17 74/24 82/5 82/13 83/13 83/15 84/14 87/18 88/15 88/22 89/3 89/20 98/17 98/19 105/4 105/12 105/23 106/8 106/10 106/11 109/25 110/20 110/21 111/22 112/4 112/20 112/23 114/20 116/7 116/7 116/18 117/3 117/22 119/10 119/11 119/15 120/14 120/16 121/11 123/9 124/2 124/13 126/22 127/7 127/14 129/14 131/1 131/25 133/11 133/16 134/10 135/5 135/23 136/11 138/9 139/6 139/10 139/11 139/23 140/9 140/13 140/18 141/24 142/5 142/6 144/21 144/23 145/2 148/15 149/20 150/18 155/13 162/12 162/17 164/3 165/1 165/9 165/17 166/18 167/2 168/18 169/14 171/25 172/4 173/6 173/9 176/20 177/16 177/16 179/8 181/20 182/15 183/10 183/17 183/19 184/18 184/18 189/12 189/13 190/18 194/3	<b>thereby [2]</b> 136/3 187/7 <b>therefore [12]</b> 6/22 24/19 48/22 74/2 94/17 94/25 114/25 124/10 150/15 154/2 156/7 186/22 <b>these [45]</b> 24/13 26/4 27/5 27/8 37/7 44/6 44/18 44/24 46/8 56/23 66/8 73/11 73/24 75/16 78/24 81/9 81/15 81/18 82/7 82/23 84/10 90/20 91/20 93/24 95/7 95/16 98/5 106/6 118/9 128/6 130/23 131/12 132/25 133/11 138/12 147/19 155/9 155/15 155/24 163/12 164/7 177/7 181/12 182/1 184/6 <b>they [114]</b> 3/24 12/2 12/5 14/20 18/2 22/12 22/13 23/10 23/22 23/22 23/24 24/21 24/21 25/25 30/12 31/4 31/5 32/10 32/17 32/18 33/5 33/16 36/9 36/19 36/19 36/20 36/21 39/3 42/23 44/18 44/19 49/11 50/3 51/1 51/23 52/22 52/23 53/11 53/20 54/13 62/13 63/24 65/1 66/19 66/21 68/14 68/15 69/11 73/1 73/11 73/14 73/15 79/6 81/11 81/13 81/22 82/25 83/6 86/25 87/23 88/20 92/5 94/13 94/13 95/3 95/4 96/21 96/23 97/1 100/21 101/24 104/9 104/15 105/10 106/12 107/2 110/5 112/4 112/19 115/16 115/22 116/24 118/17 120/3 121/18 130/4 138/13 142/19 153/4 159/12 166/19 171/22 171/24 172/13 178/16 178/21 179/7 179/11 179/15 181/15 182/24 183/6 183/6 183/7 183/21 184/6 184/7 184/8 184/10 184/17 184/23 190/17 192/23 193/7 <b>they'd [5]</b> 16/15 69/23 69/23 131/17 182/11	<b>them [79]</b> 3/21 4/5 13/5 15/9 17/13 17/25	<b>thematic [1]</b> 180/9 <b>themselves [3]</b> 16/14 16/16 125/4 <b>then [140]</b> 3/3 6/15 6/19 7/14 8/15 9/18 10/4 15/15 18/19 21/2 28/11 30/4 30/6 31/17 31/21 32/1 32/7 35/5 35/15 36/4 42/5 43/10 43/11 43/15 43/17 43/19 43/22 44/6 46/16 47/2 47/8 47/17 48/10 49/5 50/16 50/23 51/3 52/22 53/5 53/14 55/25 56/2 61/10 64/14 65/8 70/8 72/15 72/17 73/7 73/21 74/6 74/8 75/12 79/10 79/16 82/10 86/21 90/4 90/11 91/1 91/7 94/20 95/11 95/12 96/10 97/16 99/4 103/25 104/2 109/8 109/15 115/8 115/14 115/17 121/13 123/9 123/9 125/13 126/6 126/19 126/20 126/25 127/4 127/7 129/25 135/21 137/5 137/13 137/25 141/10 141/17 146/10 150/6 155/3 155/11 159/6 159/11 159/22 160/9 160/19 160/22 160/25 161/2 161/3 161/23 162/1 162/5 164/5 164/22 167/14 167/23 168/4 169/2 169/6 169/9 170/6 171/2 174/12 175/22 176/1 176/18 176/22 177/11



<b>T</b>	77/24 80/24 87/16 88/4 89/6 92/13 96/15 98/12 99/13 100/7 105/15 109/10 109/11 116/15 116/20 120/2 122/4 124/6 124/17 125/6 129/13 129/24 129/25 130/18 131/1 131/2 131/18 132/16 134/2 134/10 134/21 134/25 145/14 145/14 149/8 149/23 152/14 157/4 161/13 166/18 170/8 172/25 175/2 175/18 178/6 179/9 182/1 182/10 183/8 191/9 195/15 197/6 197/11	181/20 <b>topic [6]</b> 60/7 63/2 71/24 93/21 113/16 191/4 <b>topics [2]</b> 18/16 135/22 <b>totally [1]</b> 143/25 <b>touch [1]</b> 71/15 <b>touches [1]</b> 114/20 <b>towards [5]</b> 17/2 24/17 27/2 27/25 113/10 <b>tracked [1]</b> 114/3 <b>trading [1]</b> 174/9 <b>trail [1]</b> 191/24 <b>train [2]</b> 29/7 89/24 <b>training [2]</b> 99/23 137/15 <b>transaction [3]</b> 180/15 180/19 187/2 <b>transactions [8]</b> 36/3 38/6 38/6 84/16 129/11 144/5 174/20 174/21 <b>translate [2]</b> 159/2 168/14 <b>translating [2]</b> 159/11 161/18 <b>transmission [1]</b> 121/6 <b>transparent [4]</b> 105/6 106/3 106/15 113/9 <b>travel [1]</b> 86/1 <b>treat [1]</b> 43/24 <b>treated [6]</b> 14/19 15/5 15/9 17/18 51/20 90/3 <b>treatment [1]</b> 62/20 <b>trial [12]</b> 72/2 73/12 73/15 73/16 73/19 73/22 76/16 80/23 108/13 114/18 180/20 189/19 <b>Tribunal [2]</b> 182/12 182/13 <b>trickle [1]</b> 17/9 <b>trickled [1]</b> 17/10 <b>tried [10]</b> 20/24 22/10 49/3 53/20 54/8 54/13 89/19 96/14 131/23 185/18 <b>triggered [3]</b> 123/22 124/10 177/21 <b>trivialise [1]</b> 34/20 <b>true [8]</b> 3/23 57/9 57/10 68/10 84/10 93/11 147/14 158/2 <b>trumps [1]</b> 189/9 <b>truncated [1]</b> 197/13 <b>trust [6]</b> 36/20 38/13 38/22 39/11 39/22 59/1 <b>trusting [1]</b> 45/13 <b>truth [5]</b> 44/16 85/19	97/6 97/11 105/22 <b>try [13]</b> 23/10 24/21 49/5 65/25 66/8 88/8 90/1 92/3 92/13 95/1 105/21 131/8 146/12 <b>trying [26]</b> 7/23 8/2 15/10 15/11 16/21 34/20 46/5 47/23 53/2 57/5 65/23 75/15 76/9 77/13 77/25 96/1 100/21 104/16 104/18 110/2 141/2 162/12 180/15 181/14 183/3 183/16 <b>tune [1]</b> 87/11 <b>turn [28]</b> 1/20 1/24 7/6 24/14 49/16 62/12 62/14 62/16 63/2 72/7 82/16 82/17 83/24 114/25 115/1 120/20 125/13 130/12 135/9 135/10 136/15 142/24 158/7 173/10 179/19 179/21 185/6 186/5 <b>turnaround [1]</b> 111/18 <b>turned [4]</b> 76/8 128/5 167/16 167/18 <b>turning [1]</b> 54/16 <b>turns [1]</b> 184/15 <b>tweaking [1]</b> 107/18 <b>two [32]</b> 4/22 37/18 39/6 44/11 55/11 56/11 59/8 59/13 77/21 83/10 83/20 84/22 84/24 85/24 91/25 102/2 103/19 109/24 116/7 121/7 124/13 133/16 133/24 139/10 141/15 142/5 153/13 154/11 177/5 182/5 194/3 197/13 <b>tying [1]</b> 153/21 <b>type [2]</b> 51/8 171/16 <b>types [1]</b> 162/3 <b>typically [1]</b> 23/21 <b>typo [1]</b> 103/2 <b>typographical [1]</b> 3/19	56/6 56/16 56/24 57/8 57/18 <b>uncovered [1]</b> 148/12 <b>under [22]</b> 23/17 44/7 73/7 74/8 76/12 78/23 124/24 142/24 150/1 156/14 159/24 160/1 160/3 174/7 174/8 174/13 174/16 177/11 180/3 180/6 185/1 185/4 <b>underlined [4]</b> 61/17 160/10 168/5 193/18 <b>underlying [1]</b> 98/7 <b>undermine [2]</b> 104/20 189/8 <b>undermines [1]</b> 156/3 <b>underneath [5]</b> 160/19 160/25 163/21 167/12 168/5 <b>underpin [2]</b> 77/5 109/1 <b>underpinned [2]</b> 108/14 108/19 <b>understand [21]</b> 8/17 16/2 27/9 27/13 27/22 34/9 53/3 77/19 78/2 88/8 88/10 88/13 90/21 116/2 117/10 122/7 136/10 152/15 181/10 186/18 197/19 <b>understanding [34]</b> 15/18 15/19 20/3 24/15 25/12 25/22 26/5 26/16 27/1 27/25 28/3 51/11 64/6 75/2 75/23 80/7 80/8 80/25 81/8 81/14 81/22 82/1 82/2 82/9 82/12 88/4 93/20 100/21 101/21 131/16 167/20 175/1 185/16 193/23 <b>understood [9]</b> 41/17 79/13 80/21 112/2 112/3 152/10 177/20 187/18 196/12 <b>undertaken [5]</b> 80/15 80/15 129/18 157/10 158/1 <b>undertaking [1]</b> 21/18 <b>Underwood [1]</b> 56/2 <b>unduly [1]</b> 80/19 <b>unexplained [1]</b> 100/24 <b>unfairly [1]</b> 15/10 <b>unfolded [1]</b> 82/25 <b>unfolding [2]</b> 12/13 93/15 <b>unfortunate [1]</b> 185/17 <b>Unfortunately [1]</b>
----------	--	--	---	---

<b>U</b>	<b>upon [4]</b> 81/15 114/20 142/12 157/16	<b>various [7]</b> 7/10 22/19 45/2 137/2 137/16 166/17 193/5	29/15 30/11 31/8 35/18 36/6 36/22 41/21 45/11 46/18 61/9 61/16 62/6 62/10 87/1	69/14 75/21 75/21 77/20 89/17 165/5 170/16 177/24 182/7 196/8
<b>Unfortunately... [1]</b> 195/8	<b>upside [1]</b> 30/12	<b>variously [1]</b> 181/11	<b>Wallis' [7]</b> 30/23 30/25 31/6 38/20 40/11 42/16 61/14	<b>we'll [15]</b> 47/9 56/7 57/24 66/7 66/12 82/12 93/14 93/14 114/6 114/8 120/20 168/13 192/2 194/6 194/14
<b>unhappy [1]</b> 36/16	<b>urge [1]</b> 90/18	<b>vast [9]</b> 32/11 33/24 35/20 35/25 38/3 38/12 39/18 40/14 40/20	<b>want [35]</b> 2/12 19/7 27/11 27/22 41/10 47/14 50/19 56/9 63/17 75/1 80/18 86/3 87/9 88/21 94/13 95/1 98/11 106/9 111/18 124/4 125/24 126/1 153/24 157/14 159/15 179/1 179/15 184/12 187/6 190/11 194/19 194/25 197/11 197/17 197/18	<b>we're [23]</b> 8/5 8/11 12/12 12/20 21/24 30/8 30/12 32/12 44/17 71/17 71/25 90/6 91/5 97/18 101/15 106/19 112/20 113/16 119/6 119/8 146/18 148/1 193/17
<b>unit [11]</b> 4/16 4/17 4/21 4/25 5/2 5/6 6/2 9/13 10/11 10/13 10/20	<b>urgent [2]</b> 71/2 71/4	<b>Vennells [4]</b> 84/2 84/6 86/6 90/8	<b>wanted [12]</b> 23/2 64/4 101/24 107/2 112/4 122/7 154/15 156/6 171/13 184/13 188/11 188/14	<b>we've [26]</b> 12/20 50/21 56/8 72/20 91/5 96/15 114/22 119/7 126/3 127/22 132/1 133/11 133/13 134/15 134/17 136/22 138/17 140/11 148/14 171/6 172/24 181/4 181/9 183/14 184/25 194/8
<b>United [1]</b> 6/15	<b>us [48]</b> 1/3 1/11 1/14 8/15 18/4 23/10 32/11 32/19 35/13 39/24 46/23 60/3 68/18 79/18 86/14 87/11 88/12 92/25 93/5 95/3 101/19 103/3 106/22 107/21 108/18 113/8 113/22 128/6 128/14 130/14 147/20 152/25 153/14 153/19 160/2 163/24 166/21 168/21 169/12 169/20 178/16 179/16 181/3 183/21 184/8 188/14 191/7 192/17	<b>Vennells' [1]</b> 91/8	<b>wants [5]</b> 41/14 75/18 82/4 107/15 146/21	<b>weakness [1]</b> 156/1
<b>units [1]</b> 137/17	<b>use [24]</b> 27/22 28/14 32/10 32/17 32/19 33/5 34/16 36/5 39/5 50/6 50/24 51/11 52/16 52/25 57/3 62/1 65/17 115/12 123/7 126/10 128/9 133/19 137/17 137/20	<b>verbatis [1]</b> 159/15	<b>Warmington [4]</b> 55/9 55/15 180/7 180/11	<b>weaknesses [1]</b> 156/2
<b>unless [4]</b> 71/18 74/3 74/23 172/23	<b>used [23]</b> 2/23 27/20 32/23 34/8 34/12 34/19 38/2 55/16 56/8 56/17 67/14 67/16 68/17 69/12 73/22 89/11 103/25 112/17 112/18 141/25 144/4 144/17 180/25	<b>version [9]</b> 65/4 65/6 65/7 65/11 66/2 66/19 70/1 114/5 191/1	<b>warrants [1]</b> 74/4	<b>Wednesday [2]</b> 102/13 102/25
<b>unlikely [2]</b> 101/4 196/10	<b>useful [4]</b> 36/25 38/14 38/22 60/19	<b>versions [1]</b> 66/17	<b>was [599]</b>	<b>week [3]</b> 38/7 47/15 73/10
<b>unprotected [1]</b> 123/12	<b>user [10]</b> 31/23 32/4 41/2 99/23 137/15 137/19 137/22 153/19 180/25 186/4	<b>vertically [1]</b> 89/4	<b>wasn't [45]</b> 11/12 13/13 14/22 22/11 24/12 25/9 26/11 35/3 41/8 44/20 45/8 57/9 57/10 58/3 70/7 81/23 88/14 93/3 93/5 100/14 104/24 106/10 112/13 116/10 118/20 124/25 132/3 132/5 132/11 132/15 132/19 132/24 135/3 142/8 144/11 144/12 145/25 147/22 148/7 149/21 179/3 179/5 187/16 191/3 196/16	<b>week' [1]</b> 72/13
<b>unpublished [1]</b> 127/13	<b>users [6]</b> 31/19 32/12 33/9 36/7 174/20 174/21	<b>very [42]</b> 1/4 1/13 1/15 3/25 4/1 8/25 10/13 17/23 19/23 31/15 34/17 34/18 38/8 38/16 39/3 39/12 56/19 57/3 57/3 57/4 57/11 59/22 60/5 71/4 82/11 88/14 88/16 90/15 99/22 107/10 114/16 118/16 126/12 150/15 150/17 153/2 166/12 166/12 176/12 181/16 193/13 196/20	<b>was [599]</b>	<b>weekend [2]</b> 53/22 73/9
<b>unquestionable [1]</b> 84/11	<b>uses [1]</b> 174/17	<b>vested [2]</b> 51/9 51/13	<b>was [599]</b>	<b>weekly [7]</b> 137/3 174/8 175/14 175/20 180/23 182/5 183/1
<b>unrelated [2]</b> 28/21 182/14	<b>using [13]</b> 13/23 33/25 38/13 38/22 39/11 39/15 39/22 48/24 56/24 64/1 65/19 89/10 197/11	<b>viable [1]</b> 183/14	<b>was [599]</b>	<b>well [62]</b> 13/13 19/5 19/5 20/12 20/20 20/25 21/21 23/7 26/8 33/2 34/3 35/2 37/16 39/21 45/9 45/11 48/4 49/5 53/21 54/5 57/22 69/12 69/20 75/6 78/5 78/10 85/4 95/21 96/22 97/2 100/20 100/21 109/4 110/23 111/25 124/22 133/16 133/18 133/22 135/4 140/23 142/8 144/13 149/14 150/21 166/24 168/24 169/14 171/3 171/9 171/13 173/24 178/20 179/13 184/5 187/16 187/24 193/20 194/2 195/2 195/3 195/7
<b>unsafe [3]</b> 142/12 142/13 184/20	<b>usual [1]</b> 31/24	<b>view [35]</b> 14/19 16/8 32/19 42/23 53/18 53/24 54/6 54/11 54/18 59/13 62/12 70/8 71/13 73/11 82/16 86/13 87/10 102/18 109/19 133/3 142/11 142/14 143/6 143/7 143/13 147/12 147/24 148/14 148/18 148/22 163/6 188/8 190/10 196/20 197/10	<b>Watts [1]</b> 72/24	<b>went [1]</b> 191/2
<b>until [20]</b> 6/12 9/14 10/9 10/10 10/10 10/19 10/20 59/21 66/12 67/24 79/9 79/14 79/24 108/16 108/20 113/13 145/23 152/19 173/2 198/1	<b>usually [2]</b> 24/1 116/2	<b>views [7]</b> 35/14 61/8 61/16 62/3 62/6 62/10 79/5	<b>way [39]</b> 18/1 18/7 20/4 28/23 35/12 35/13 37/12 42/24 53/4 66/8 67/1 68/14 70/25 74/9 77/14 80/5 96/2 104/17 105/9 115/20 119/14 120/10 121/24 125/4 134/12 140/20 141/8 142/17 145/21 148/5 148/17 172/20 176/10 184/11 184/21 189/4 190/19 192/3 196/5	<b>were [169]</b> 6/8 6/15 7/23 8/2 10/14 10/25
<b>untruths [2]</b> 113/1 113/7	<b>utterly [1]</b> 90/13	<b>visibility [1]</b> 138/9	<b>ways [1]</b> 189/13	
<b>up [80]</b> 7/6 27/16 28/13 29/20 29/22 31/4 37/5 38/4 39/17 40/13 40/19 40/22 40/23 42/4 42/5 43/5 43/15 48/2 48/3 49/10 49/14 50/1 53/14 55/3 55/5 55/25 56/4 58/22 64/18 65/8 65/12 70/13 70/17 71/18 76/10 80/20 82/17 85/17 86/10 86/16 91/7 93/13 94/7 97/9 102/8 105/18 105/21 106/21 107/24 108/16 115/2 117/1 126/3 127/3 127/17 128/5 130/12 131/9 135/10 138/1 142/24 146/23 147/14 148/2 152/19 154/10 159/23 167/16 167/18 168/16 168/22 169/24 172/7 176/15 179/19 181/19 186/9 188/15 192/24 197/1		<b>visible [1]</b> 185/25	<b>we [422]</b>	
<b>up' [1]</b> 121/11		<b>voice [1]</b> 166/3	<b>we'd [12]</b> 28/7 69/8	
<b>update [1]</b> 72/10	<b>v2 [1]</b> 65/10	<b>volume [1]</b> 36/2		
<b>updated [1]</b> 72/10	<b>valid [1]</b> 183/14	<b>volunteered [2]</b> 179/3 179/4		
<b>updates [1]</b> 121/3	<b>van [6]</b> 86/7 86/10 88/8 93/18 94/7 94/22	<b>voting [1]</b> 40/4		
<b>upgrades [1]</b> 32/2	<b>variety [3]</b> 9/3 31/19 31/24	<b>W</b>		
		<b>wait [5]</b> 78/25 79/9 79/14 79/24 179/18		
		<b>waived [1]</b> 187/7		
		<b>waiver [1]</b> 187/9		
		<b>wake [1]</b> 85/17		
		<b>Wales [1]</b> 6/16		
		<b>Wallis [15]</b> 29/11		

W				
<p><b>were... [163]</b> 11/11 11/17 12/3 12/8 12/25 13/3 13/21 13/22 13/22 14/20 16/15 16/17 17/22 17/23 21/16 23/24 25/21 26/6 26/13 34/4 34/13 37/17 37/20 38/1 38/8 48/14 49/11 54/4 54/5 54/21 55/17 55/19 56/16 56/24 57/18 59/2 61/19 62/25 63/11 64/25 65/5 65/6 65/23 65/23 67/4 67/25 72/3 73/1 73/18 74/18 75/8 76/2 76/23 77/21 78/13 82/7 83/6 83/16 85/10 87/17 87/18 88/15 89/20 91/20 93/9 95/7 95/17 96/12 96/21 97/2 97/17 100/8 100/17 100/21 101/25 103/3 103/9 103/9 103/14 104/15 105/5 107/4 108/8 112/19 114/10 114/12 115/23 116/5 116/14 116/15 117/13 118/15 118/17 118/17 119/12 120/1 121/18 121/22 124/12 125/2 129/14 131/12 133/11 138/12 139/13 140/3 140/6 141/3 142/2 142/12 142/13 144/18 144/23 144/24 145/6 146/9 146/25 148/10 149/18 149/23 150/18 150/25 151/3 152/13 154/25 157/9 159/24 162/16 163/12 164/8 164/13 164/24 165/9 167/6 168/8 168/24 171/4 171/12 171/22 171/24 172/2 172/4 172/13 173/19 177/1 178/11 178/17 179/4 182/17 182/22 182/22 182/24 183/6 184/3 184/3 184/6 184/10 187/10 187/13 190/2 191/20 193/6 193/7</p> <p><b>weren't [12]</b> 25/15 76/25 89/2 93/1 100/10 107/21 136/14 140/24 148/6 172/13 180/19 196/18</p> <p><b>what [273]</b> <b>what's [14]</b> 19/9 30/21 35/5 77/25 79/19 81/17 105/3 105/23 116/2 148/2</p>	<p>167/10 176/20 191/25 196/6</p> <p><b>whatever [3]</b> 76/4 88/23 94/17</p> <p><b>when [62]</b> 2/3 6/18 9/13 9/20 10/14 10/22 10/25 12/8 13/3 13/8 13/16 15/16 20/3 31/12 37/17 40/8 44/7 44/8 45/19 50/2 52/21 55/16 57/14 62/2 67/19 70/24 71/3 77/15 78/6 78/22 89/3 104/9 108/5 110/5 116/1 117/6 117/15 120/3 128/18 131/11 131/20 132/6 132/17 132/24 133/12 133/17 134/23 135/3 141/1 141/7 147/11 147/19 148/10 152/4 171/10 175/4 175/17 175/23 176/2 182/7 184/23 187/18</p> <p><b>where [43]</b> 4/5 16/22 22/16 24/1 26/23 34/23 35/17 55/20 61/23 62/22 82/13 85/14 88/3 88/15 89/17 89/19 92/14 107/15 107/23 108/1 110/12 117/9 117/19 122/9 123/5 128/18 132/1 135/19 136/6 145/14 149/23 152/9 152/11 155/19 172/5 182/7 189/10 191/2 191/24 192/21 193/10 193/21 195/25</p> <p><b>whereby [1]</b> 180/24</p> <p><b>whether [61]</b> 12/3 12/16 22/12 23/10 26/13 44/25 62/9 62/13 62/14 64/25 72/3 73/11 74/25 75/14 76/14 76/25 79/4 83/1 96/11 99/10 99/19 100/23 114/2 116/19 117/19 117/20 125/6 125/8 128/24 130/5 131/17 133/14 133/25 138/23 139/23 141/5 145/10 146/6 148/6 151/15 152/14 154/12 155/9 158/2 159/18 163/4 163/5 172/13 178/24 181/24 182/9 183/13 184/6 184/13 186/3 186/24 187/16 187/24 188/6 191/15 192/14</p> <p><b>which [134]</b> 2/10 3/3 6/1 7/12 14/14 14/16 16/4 16/22 19/18</p>	<p>23/23 26/23 30/11 31/5 35/15 36/16 38/12 39/5 41/1 45/22 46/6 46/24 51/1 55/13 55/21 55/22 56/12 57/16 58/23 61/16 61/20 65/5 65/6 65/20 65/23 67/13 68/22 69/17 69/19 72/2 73/3 73/4 75/6 78/10 81/10 81/23 82/6 83/20 87/15 88/11 89/10 91/22 95/6 95/17 99/9 99/22 102/18 104/8 104/8 105/7 105/20 106/2 106/11 107/1 108/13 108/14 113/8 113/25 114/9 114/20 120/1 121/1 121/13 126/8 130/22 132/12 132/20 133/1 133/5 133/6 135/24 136/11 136/13 137/3 137/10 137/15 137/17 138/4 138/13 139/7 139/18 141/3 141/13 141/20 143/1 144/3 144/23 144/24 145/3 145/16 147/4 147/4 148/13 151/6 151/24 152/11 154/20 159/14 159/17 160/11 171/4 171/5 171/6 172/2 177/25 178/16 180/9 180/11 181/5 182/6 183/20 184/8 185/7 185/10 187/17 188/7 188/9 189/8 189/14 189/14 190/18 190/22 190/25 193/12 196/8</p> <p><b>while [6]</b> 28/13 51/17 98/5 110/3 110/21 185/18</p> <p><b>Whilst [1]</b> 122/24</p> <p><b>whim [4]</b> 34/6 34/11 34/16 34/19</p> <p><b>whims [3]</b> 32/14 34/4 34/6</p> <p><b>whitewash [1]</b> 100/18</p> <p><b>who [69]</b> 10/2 10/7 16/14 16/16 17/15 36/24 37/13 39/12 42/6 44/3 46/16 48/20 49/23 50/1 50/9 50/25 51/8 51/13 53/10 53/15 53/21 53/25 54/15 54/25 55/9 59/5 63/18 64/14 85/22 86/24 87/11 89/5 90/15 92/10 93/9 96/11 101/16 107/15 109/18 109/18 111/10 118/17 118/22 124/21</p>	<p>125/12 127/21 128/1 134/2 136/13 137/19 140/1 141/3 146/13 147/24 147/25 149/18 152/10 158/14 163/14 163/16 165/6 165/6 166/11 168/19 173/19 175/15 191/8 194/10 196/15</p> <p><b>who's [2]</b> 119/8 166/1</p> <p><b>whoever [1]</b> 193/8</p> <p><b>whole [6]</b> 3/9 8/19 50/7 135/4 144/2 144/3</p> <p><b>wholly [2]</b> 80/19 169/4</p> <p><b>whom [8]</b> 9/24 10/6 13/21 24/2 54/3 160/2 163/2 193/4</p> <p><b>whose [3]</b> 85/10 124/24 137/20</p> <p><b>why [79]</b> 13/7 19/8 21/24 22/3 28/9 34/16 38/20 38/23 39/10 44/6 44/24 48/6 53/19 53/20 54/7 54/8 54/12 54/13 55/17 56/24 62/2 62/9 67/19 69/17 69/18 75/17 75/19 76/9 77/13 79/14 80/12 87/25 88/18 91/20 93/13 100/17 103/9 103/9 104/8 106/11 107/3 108/7 111/20 112/22 120/15 123/14 123/19 133/9 140/15 140/17 140/24 141/3 144/18 145/21 145/25 145/25 150/7 150/11 150/22 160/7 163/12 163/17 171/12 177/16 178/12 179/3 182/3 182/23 184/12 187/10 187/17 188/1 188/7 189/23 190/11 194/24 195/5 195/21 196/3</p> <p><b>wide [3]</b> 6/23 154/24 176/9</p> <p><b>wide-ranging [1]</b> 6/23</p> <p><b>widely [2]</b> 150/16 150/17</p> <p><b>wider [5]</b> 29/23 74/5 99/22 137/4 146/6</p> <p><b>widest [1]</b> 101/23</p> <p><b>will [36]</b> 22/2 46/24 64/18 65/1 65/3 65/14 65/17 73/10 78/8 82/5 85/2 85/15 86/4 90/24 91/19 91/23 92/4 93/16 95/3 99/25 102/17 111/15 111/18</p>	<p>113/8 122/24 123/3 124/19 137/9 137/18 155/15 161/4 168/14 168/22 195/19 197/5 197/10</p> <p><b>Williams [24]</b> 1/5 1/7 1/9 1/12 27/13 28/13 30/5 41/13 46/4 60/6 70/21 80/22 113/24 114/18 114/22 115/1 118/1 147/7 153/3 173/12 183/22 197/7 197/17 199/2</p> <p><b>willingness [1]</b> 35/10</p> <p><b>Wilson [1]</b> 129/25</p> <p><b>wise [1]</b> 87/15</p> <p><b>wish [7]</b> 1/24 2/24 3/6 3/9 22/13 22/18 46/4</p> <p><b>wished [1]</b> 64/25</p> <p><b>withholding [1]</b> 66/9</p> <p><b>within [30]</b> 4/24 7/11 16/13 18/5 19/16 23/21 28/21 28/22 37/13 53/24 54/3 54/6 54/11 80/24 100/7 109/7 109/15 111/3 118/25 122/24 127/16 131/7 131/13 131/15 133/6 134/5 152/13 158/1 191/11 191/12</p> <p><b>without [15]</b> 20/13 30/7 40/10 60/25 72/4 75/24 88/17 115/11 161/4 161/11 161/19 170/17 182/19 190/3 191/2</p> <p><b>WITN08420100 [1]</b> 1/16</p> <p><b>witness [48]</b> 1/15 1/16 3/22 3/25 4/1 4/7 7/7 12/24 18/21 19/9 19/11 20/4 20/20 20/23 23/16 34/22 35/9 46/13 50/5 82/17 87/17 97/20 103/3 107/21 115/2 119/19 120/21 128/4 130/12 136/4 138/3 141/13 142/1 145/17 147/25 156/8 156/15 156/16 156/25 163/7 168/9 170/10 170/13 171/1 171/17 171/17 171/20 185/6</p> <p><b>woman [1]</b> 90/14</p> <p><b>Womble [6]</b> 72/22 72/25 73/8 83/5 115/17 147/2</p> <p><b>women [1]</b> 17/15</p> <p><b>won't [2]</b> 92/10 197/18</p> <p><b>wonder [3]</b> 29/17 31/10 103/1</p>

<p><b>W</b></p> <p><b>word [18]</b> 2/13 2/25 3/6 3/7 3/16 3/16 18/24 19/23 25/17 27/14 27/20 34/8 34/12 34/16 34/19 39/5 81/1 120/12</p> <p><b>worded [1]</b> 39/3</p> <p><b>words [9]</b> 2/14 2/17 2/25 18/25 62/8 103/24 193/18 193/21 194/16</p> <p><b>work [37]</b> 2/24 2/25 5/14 6/19 14/23 16/21 28/24 32/12 42/9 56/18 56/21 56/25 58/1 74/1 74/19 75/15 76/9 76/22 77/13 78/14 79/8 80/14 80/15 95/18 98/7 101/22 102/7 107/24 111/2 113/11 118/6 129/17 129/22 147/2 153/19 184/21 197/10</p> <p><b>worked [6]</b> 6/12 6/14 6/18 42/8 141/2 147/2</p> <p><b>working [10]</b> 16/25 35/13 42/21 44/7 49/12 108/24 110/10 111/22 134/5 172/11</p> <p><b>works [1]</b> 35/13</p> <p><b>workstream [1]</b> 72/23</p> <p><b>world [3]</b> 67/2 67/6 148/11</p> <p><b>worried [1]</b> 27/10</p> <p><b>worry [1]</b> 153/4</p> <p><b>would [172]</b> 2/24 8/3 8/7 8/10 8/16 8/23 8/25 11/22 11/22 11/24 13/2 13/7 13/13 14/25 15/5 15/5 15/6 17/20 18/6 18/9 18/9 18/15 18/20 20/2 23/2 23/25 24/7 24/18 25/1 25/4 25/7 25/9 25/19 25/24 26/7 27/13 28/4 28/6 31/14 32/6 34/1 35/1 36/11 36/14 36/25 37/15 38/14 38/22 39/25 40/10 40/25 42/14 42/25 45/23 49/15 50/10 57/8 57/20 58/23 59/3 60/25 61/4 61/15 62/1 63/10 66/3 66/5 66/14 69/13 70/7 71/1 72/12 72/14 72/15 76/1 77/22 77/25 78/13 78/15 78/19 79/8 85/3 86/19 90/1 90/2 91/16 95/5 95/7 96/17 96/17 99/9 99/10 99/19</p>	<p>99/21 100/9 100/18 101/5 104/22 107/2 109/9 109/21 109/22 111/4 112/5 112/6 112/22 112/23 114/2 115/20 115/24 116/1 116/19 120/6 120/11 121/13 121/14 122/10 129/19 132/8 132/9 134/3 134/4 136/1 138/9 138/16 141/22 142/9 142/18 142/21 147/6 148/19 149/9 149/11 149/11 150/18 150/19 150/21 152/12 157/21 159/14 159/17 160/4 160/11 161/4 161/13 161/19 165/5 166/22 167/8 170/14 170/17 175/19 178/16 178/19 178/20 178/21 178/24 179/15 179/16 180/8 181/2 182/18 183/7 184/7 189/8 189/15 189/20 190/3 190/21 193/4 193/7 195/21</p> <p><b>wouldn't [15]</b> 14/18 15/9 16/7 17/3 17/13 17/21 19/6 32/5 36/12 79/12 106/9 112/18 141/8 149/10 150/17</p> <p><b>write [5]</b> 2/6 31/1 44/7 86/23 173/23</p> <p><b>writer [1]</b> 55/1</p> <p><b>writing [11]</b> 37/17 41/24 46/22 68/20 89/15 91/20 106/20 147/25 158/10 183/2 193/9</p> <p><b>written [16]</b> 7/21 18/18 18/20 26/5 34/6 43/3 55/5 105/3 125/20 135/19 141/12 151/6 158/14 160/16 164/6 166/12</p> <p><b>wrong [20]</b> 16/23 18/22 19/2 19/3 19/4 19/8 19/21 19/23 20/2 20/10 20/17 22/5 36/21 37/4 48/9 64/5 67/10 100/15 123/1 167/3</p> <p><b>wrongly [1]</b> 132/21</p> <p><b>wrote [14]</b> 15/1 30/5 31/8 31/17 32/7 35/19 40/8 52/15 77/13 89/24 96/2 114/3 141/7 158/12</p> <p><b>Y</b></p> <p><b>yeah [17]</b> 8/7 14/10 15/7 16/2 21/19 39/7 52/11 67/3 89/13</p>	<p>129/9 132/8 139/22 160/23 161/11 162/25 179/13 194/20</p> <p><b>year [11]</b> 8/13 9/15 17/1 38/6 38/7 53/9 55/13 90/6 144/7 174/16 174/21</p> <p><b>years [17]</b> 4/9 15/22 19/5 37/18 44/8 44/9 56/18 63/6 63/9 63/13 72/1 82/24 84/10 84/23 108/21 109/3 156/12</p> <p><b>yes [246]</b></p> <p><b>yesterday [1]</b> 191/14</p> <p><b>yesterday's [1]</b> 55/8</p> <p><b>yet [8]</b> 35/12 43/3 47/13 73/24 74/20 76/21 127/13 141/17</p> <p><b>York [2]</b> 6/18 6/21</p> <p><b>you [802]</b></p> <p><b>you'd [2]</b> 7/8 63/8</p> <p><b>you'll [13]</b> 29/20 29/22 46/16 49/22 52/19 55/1 74/15 76/8 135/13 136/18 173/16 176/20 197/17</p> <p><b>you're [28]</b> 4/24 11/6 13/19 15/12 16/22 21/6 21/25 26/1 37/8 44/7 44/22 57/13 77/10 79/4 83/18 99/5 101/6 116/1 117/9 119/1 144/16 145/3 147/16 148/9 165/17 166/9 166/9 171/10</p> <p><b>you've [16]</b> 4/2 5/2 18/18 18/20 33/4 33/4 38/21 40/5 45/9 48/23 118/8 119/17 119/24 160/16 164/6 182/21</p> <p><b>your [156]</b> 1/11 1/21 3/23 4/5 4/10 5/25 6/8 7/6 7/20 7/25 8/6 8/18 8/24 9/15 11/21 12/24 13/18 15/22 16/7 18/19 18/21 20/4 20/6 20/16 20/22 22/4 22/23 23/11 23/12 23/15 24/15 25/12 26/16 27/23 28/24 29/17 30/18 30/20 30/21 31/10 32/15 32/19 33/14 33/14 34/22 35/9 35/20 35/25 36/4 37/7 37/7 37/17 37/18 38/17 41/4 44/20 46/13 47/12 48/25 52/12 57/14 62/14 63/3 64/4 66/6 66/16 67/22 68/8 68/9 70/6 70/10 71/11 72/8 72/11 74/24 75/4 75/12 76/24 80/2</p>	<p>82/12 82/16 82/17 84/14 84/25 85/8 85/10 86/3 86/21 87/17 87/19 90/4 91/15 95/13 96/10 97/16 97/20 97/23 97/25 98/11 98/12 98/21 101/5 103/3 106/20 107/21 108/7 110/22 111/2 113/25 115/2 116/4 116/22 117/11 118/7 119/18 120/6 120/20 128/4 128/8 130/12 130/15 133/5 136/18 138/3 141/13 143/3 146/9 146/22 146/25 152/5 154/11 156/15 163/10 163/13 163/17 164/20 164/21 165/13 166/4 166/10 168/25 171/22 172/7 172/12 172/22 172/25 173/9 173/15 175/1 185/6 185/15 186/10 190/5 191/12 194/22 197/19</p> <p><b>yourself [7]</b> 25/21 74/7 79/4 85/15 86/2 109/20 162/8</p> <hr/> <p><b>Z</b></p> <p><b>Zealand [1]</b> 6/9</p>
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