

<p>1 (Friday, 12 April 2024) 2 (10.00) 3 THE CHAIRMAN: Yes, an hour and a 4 quarter. 5 SIR PETER CARUANA: Good morning, 6 sir. 7 PAUL RICHARDSON 8 Cross-examination by SIR PETER 9 CARUANA (Continued) 10 Q. Good morning to you, Mr Richardson. 11 Could I start this morning just talking about 12 the meeting of 7 April with the Attorney 13 General? Yesterday I think you were saying 14 that the principal issue to discuss was the 15 rationalisation of charges. By that do you 16 mean the reduction in the number of charges 17 as opposed to the people to be charged? 18 A. I understood that to mean a reduction in 19 the charges to omit any that reflected 20 ownership by the Government. 21 Q. Right, which was the second major issue 22 discussed, the question of the ownership and 23 the dispute that existed as to who it belonged 24 to. And in respect of those two matters, your 25 evidence yesterday was that these were</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. Yes, so it did not lead to anything that 2 you were not already doing and I am asking 3 you to agree that therefore there was no 4 interference on his part. 5 A. That is correct. 6 Q. And then there was this question of his 7 reference to Mr Sanchez on the question 8 about, "Never mind whether we agree or 9 disagree on the wording used", but the 10 linking of Mr Sanchez to Civil Service 11 disciplinary procedures - do you remember 12 you gave that evidence yesterday? 13 A. I do remember. 14 Q. Just so that you are aware, the Attorney 15 General's evidence is that he does not recall 16 that, and if we could put that up at A300 - 17 actually, it is probably not necessary. I just 18 wanted you to be aware that the Attorney 19 General does not recall it in that way, 20 articulated in the way - we can look, by all 21 means. Put it up, A300, paragraph 9. "I do 22 not recollect mentioning CS in the way IM 23 describes. If I did, it would have been during 24 the meeting on the 7th and just to inquire on 25 how he would be proceeded with in view of</p> <p style="text-align: center;">Page 3</p>
<p>1 already two issues that you were on to and 2 dealing with -- 3 A. That's correct. 4 Q. -- with the DPP. So, do you agree with 5 me there is no question of the Attorney 6 General having interfered with your 7 investigation in respect of those two matters? 8 A. The Attorney General's opinion on the 9 meeting of 13 May - 10 Q. Well, we are going to go to the meetings 11 in turn. I am talking about 7 April, if you do 12 not mind. 13 A. On 7 April, when we met, the Attorney 14 General asked us to rationalise the charges 15 down - 16 Q. Yes. 17 A. - to reduce them from what they were to 18 a number which reflected the number of 19 charges that would be left if we omitted the 20 question of ownership. 21 Q. Right, and you said that that was 22 something that you were working on 23 already? 24 A. That was something that we had been in 25 discussions with, with the DPP.</p> <p style="text-align: center;">Page 2</p>	<p>1 Civil Service disciplinary procedures and 2 nothing more." Now, also so that you are 3 aware, Mr DeVincenzi was at that meeting 4 too, was he? 5 A. Yes, he was. 6 Q. Yes. He does not say anything about this 7 in his written statement. Are you aware of - 8 have you read - have you seen Mr 9 DeVincenzi's witness statement? 10 A. I have seen it but I can't recall the 11 contents of it. 12 Q. Okay, so do you agree with me, Mr 13 Richardson, that it is very odd that given that 14 yesterday you said that you were shocked by 15 the fact that the Attorney General - do you 16 remember saying that you were shocked 17 about this -- 18 A. Yes. 19 Q. - that you also do not mention it in either 20 of your two witness statements. So, 21 yesterday it was shocking. Before yesterday 22 it was not noteworthy to record in your - do 23 you agree with me that that is somewhat 24 surprising? 25 A. I'm surprised that it isn't in either of my</p> <p style="text-align: center;">Page 4</p>

1 **statements, yes.**
 2 Q. Yes. Nor is it recorded in your note of
 3 the meeting set out at paragraph 66 of your
 4 witness statement. We saw this yesterday:
 5 A1436. So, the Attorney General does not
 6 remember it in that way; Mr DeVincenzi
 7 does not mention it; you do not mention it in
 8 your witness statements; it is not recorded in
 9 your note of the meeting; you mention it
 10 yesterday for the first time when you were
 11 being questioned by Mr McGrail's lawyer but
 12 Mr McGrail does mention it in his witness
 13 statement.
 14 **A. Mr Caruana -**
 15 Q. A5.
 16 **A. I beg your pardon. Sorry, you mentioned**
 17 **that it's not mentioned in my notes but there**
 18 **is a reference to that three lines from the**
 19 **bottom. I said CS was corrupt from what we**
 20 **had seen. That is a note with reference to**
 21 **that conversation.**
 22 Q. Yes, well it may be - no, it is a reference
 23 to your view that Mr Sanchez is corrupt. It is
 24 not a reference to the shocking fact that the
 25 Attorney General suggested to you that he

Page 5

1 might be dealt with by disciplinary
 2 proceedings and not by the application of the
 3 law. It is not a reference to it at all, Mr
 4 Richardson.
 5 **A. Mr Caruana, with respect, it's my notes**
 6 **that was made a few weeks after the event**
 7 **and that's what I was referring to.**
 8 Q. Yes, well not shocking enough for you to
 9 make a single direct allusion to the thing that
 10 shocked you. So, the person who does
 11 mention it is the client of the man who asked
 12 you the question that you gave the answer to
 13 for the first time yesterday. So, at A5,
 14 paragraph 15 - this is Mr McGrail's witness
 15 statement - "During at least two of the
 16 meetings at which I discussed Op Delhi with
 17 the Attorney General, he inquired whether
 18 Mr Caine Sanchez could be dealt with
 19 internally via the Civil Service disciplinary
 20 route" and then it goes on and we can carry
 21 on reading if we want. Now, my question to
 22 you, Mr Richardson, is this. Given the above
 23 - I am not going to go through the list again
 24 of where it does not feature in your output
 25 prior to yesterday afternoon - given all of

Page 6

1 that, is it the case that your oral evidence
 2 yesterday, raising as it did the matter for the
 3 first time ever, outwardly reflects actually
 4 what Mr McGrail says in his witness
 5 statement and nothing more?
 6 **A. No, no it isn't because I don't remember**
 7 **what Mr McGrail says in either of - any of**
 8 **his witness statements. What I can tell you is**
 9 **what I remember about what happened on**
 10 **that day.**
 11 Q. What, you have not read Mr McGrail's
 12 witness statements?
 13 **A. I have read many, many statement but I**
 14 **can't remember the contents of them.**
 15 Q. You have been sitting in this inquiry
 16 room since it started and this has been
 17 alluded to in submissions.
 18 **A. That is correct but I still can't remember**
 19 **everything that has been said.**
 20 Q. Okay. In any event, Mr Richardson, did
 21 Mr Llamas make any attempt at that meeting
 22 on the 7th or later to persuade you or to try to
 23 persuade you not to investigate Mr Sanchez
 24 or not to charge Mr Sanchez?
 25 **A. I think "persuade" is too strong a word.**

Page 7

1 **There was a suggestion that didn't we deal**
 2 **with Caine Sanchez by route of the**
 3 **disciplinary -**
 4 Q. What, other than in the meeting on the
 5 6th?
 6 **A. Sorry?**
 7 Q. Other than in the meeting on the 6th?
 8 **A. Other than in the meeting of the 6th?**
 9 Q. When?
 10 **A. No, no -**
 11 Q. No, in the meeting of the 6th, you mean?
 12 **A. Sorry, what are you referring to?**
 13 THE CHAIRMAN: What meeting of the
 14 6th?
 15 SIR PETER CARUANA: Sorry? Of the 7th,
 16 I beg your pardon. Thank you, sir, the 7th.
 17 (To the witness) Other than in the meeting of
 18 the 7th - my apologies.
 19 **A. That is correct. That is the only reference**
 20 **that I can recall now that you mentioned**
 21 **Mr Sanchez.**
 22 Q. So, my question was in any event did he
 23 make any attempt later to try and persuade
 24 you in addition to - other than what we have
 25 been discussing this morning - other than

Page 8

<p>1 that, has the Attorney General at any stage 2 sought to protect Mr Sanchez? 3 A. I don't recall in any of the three meetings 4 that followed whether there was reference to 5 Mr Sanchez but my recollection is of the 6 meeting of the 7th. 7 Q. Yes, well thanks to Mr McGrail's covert 8 recordings, it is not a matter of recollection. 9 It is there - it would be there. 10 A. It would be there but I can't remember 11 now if it is mentioned in either of those three 12 long meetings. 13 Q. So, you cannot remember, meaning that 14 in your mind both possibilities are open? Is 15 that what you mean by, "I don't remember?" 16 A. What I can be clear about, Mr Caruana, is 17 what I remember being said on the meeting 18 of the 7th and my reaction to that, which 19 resulted in me saying to Mr Llamas, "The 20 man is corrupt from what we understand" 21 and his reaction to my saying that. Whether 22 it was mentioned at any point beyond that, I 23 can't remember. 24 Q. Did you express your concern at the time 25 to the Attorney General of this shocking</p> <p style="text-align: center;">Page 9</p>	<p>1 paragraph 5. We saw this yesterday. "On 2 arrival at the premises we would therefore 3 seek in the first instance to be granted access 4 to the relevant devices without the use of a 5 warrant. A warrant would only require 6 execution where cooperation was not 7 offered", and I think you added when this 8 was put to you yesterday that actually that is 9 what happened, I think were your words. 10 A. Yes, that's correct. 11 Q. Thank you. So, am I right to say that 12 therefore no one interfered with your plans 13 for that day, that the day went as you had 14 planned it? 15 A. The execution of the search warrant or 16 non-execution of the search warrant as it 17 happened, did go as we had planned. 18 Q. Yes. That is my point. You are not 19 aware that the Chief Minister or the Attorney 20 General or anybody else interfered in a way 21 that prevented you from doing on that day 22 with Mr Levy and in his office and in his 23 home precisely what you had planned to do? 24 A. There was one phone call from Mr 25 McGrail when I was at Hassans. I left the</p> <p style="text-align: center;">Page 11</p>
<p>1 thing? Did you manifest your "shockedness" 2 in any way? 3 A. I just said that I did. I said to him -- 4 Q. To the Attorney General? 5 A. Yes. I said -- 6 Q. What did you say? 7 A. I was taken aback. I said, "Sir, from what 8 we've understood - from what we 9 understand, this man is corrupt", and that for 10 me is like saying, "How could you suggest 11 that we deal with someone that has - that is 12 alleged of the crimes that we're talking about 13 to be dealt with by government general 14 orders?" 15 Q. The meeting was otherwise amicable, 16 was it? 17 A. The whole meeting was amicable. 18 Q. Okay. So, moving now to the day itself, 19 12 May, if I may, Mr Richardson, yesterday 20 you gave evidence that the obtaining of Mr 21 Levy's devices went according to the plan 22 that Mr Wyan had devised. You remember 23 the options report? 24 A. The options reports concerns - 25 Q. Put it on the screen then, B3278,</p> <p style="text-align: center;">Page 10</p>	<p>1 office to take it. It's recorded on the body- 2 worn camera that I left for that purpose and I 3 was being recalled to New Mole and I think, 4 although I am not certain, that Mr McGrail 5 had said that he had the dressing down of his 6 career by a Chief Minister and wanted me to 7 come back to brief him but I don't know at 8 what point that took place. 9 Q. Really? Where is this stated in your 10 evidence to date? Where have you said this 11 before right now? 12 A. I don't think that I have said it. 13 Q. Now, do you not think that that would 14 have been highly relevant? 15 A. I answered questions that were put to me 16 by the Counsel to the Inquiry. 17 Q. Yes, and in your second witness 18 statement? 19 A. I answered further questions that were put 20 to me by the Counsel to the Inquiry. 21 Q. And when you were being questioned by 22 my learned friends yesterday? 23 A. I answered the questions to the best of my 24 ability. 25 Q. I see. Okay, well the Inquiry will make</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 of your answers whatever it will. So, can we 2 go to B3475? In any case, before we move 3 on, whatever might have been that call that 4 you do not remember when it took place, it 5 did not alter your plans, did it? 6 A. The only way that it would have altered 7 my plans is me leaving the premises before 8 the business that we were dealing with had 9 terminated. 10 Q. Did you do that? 11 A. I did. 12 Q. You left the premises? 13 A. Before the search or the procedure was 14 terminated. 15 Q. What, because of this call? 16 A. Yes. 17 Q. And this is the first time you are 18 mentioning this? 19 A. Yes. 20 Q. Do you think that is credible, Mr 21 Richardson? 22 A. Yes. 23 Q. Okay, but in any event, the day went, 24 other than your leaving the office earlier than 25 you might, exactly as Mr Wyan had planned</p> <p style="text-align: center;">Page 13</p>	<p>1 A. No, I am not saying that. 2 Q. Well, then, why raise the spectre of it? 3 A. I'm saying that if that comment was said 4 at the very beginning of that investigation - 5 at the very beginning of that meeting - and I 6 don't know when it was said and later on I 7 had been recalled from the premises to brief 8 the Commissioner, that that had clearly had 9 an effect on my attendance at Hassans. I 10 wouldn't say that that was an interference 11 though in the investigation. 12 Q. Well, let us just settle for that. Thank 13 you. 14 A. Thank you. 15 Q. So, can we go now to B346 at point 5. 16 A. Sir, what is this document? 17 Q. Yes, if we go to the previous page it will 18 give Mr McGrail an opportunity to identify - 19 A. Mr McGrail, sir? 20 Q. Sorry, did I call you Mr McGrail? 21 A. You did, sir. 22 Q. I meant Mr Richardson. My apologies to 23 you. Do you see what it is now? 24 A. It is an email from myself to 25 Superintendent Wyan dated 28 October</p> <p style="text-align: center;">Page 15</p>
<p>1 it in paragraph 5: "The warrant was not 2 executed because Mr Levy surrendered the 3 device voluntarily". Is that correct? 4 A. That is correct. 5 Q. So, B3475, your entry at the top of the 6 first box there. Did you - you obviously did; 7 this is a transcript from the body worn - you 8 told Mr Levy that, "It's your decision 9 entirely. I can assure you with my hand on 10 my heart that nobody has interfered at all 11 with the - with my conduct of this 12 investigation" - at all. 13 A. I take it this is a transcript of the body- 14 worn camera footage? 15 Q. Yes. 16 A. At what time was that said, Mr Caruana? 17 Q. Does it matter? 18 A. Yes, because this may have been very, 19 very early on in my attendance at Hassans. 20 Q. You think somebody might have 21 interfered after to render that assurance, hand 22 on heart, no longer true - 23 A. No. 24 Q. - (inaudible)? Is that what you are 25 saying?</p> <p style="text-align: center;">Page 14</p>	<p>1 2020. 2 Q. Yes, it's about the Levy Report. 3 A. Yes. 4 Q. Can we go down to paragraph 5? This is 5 you reporting to - do you want to go back to 6 the top? This is you to Mr Wyan. 7 A. May I read it, sir? 8 Q. Yes, you may but I am only interested in 9 paragraph 5, but just focus on what it says 10 immediately under the word "Subject" so that 11 you do not get misled. This is you - 12 A. Sir, paragraph 5 isn't on screen. 13 Q. No, no. Please go to the top of where we 14 were. Just wait for me to ask you a question, 15 Mr Richardson. I just want to point out to 16 you for your benefit that this is you sending 17 Mr Wyan a draft text of an email that you 18 would subsequently send to the 19 Commissioner including, attaching the Levy 20 Report explaining to then Commissioner 21 (inaudible) why interest in Mr Levy was 22 being lost. Okay? So, that is - what follows 23 below that is the draft that you were putting 24 to Mr Wyan, "Mark, your views, please" and 25 then it says, "Sir" - you would not be calling</p> <p style="text-align: center;">Page 16</p>

<p>1 Mr Wyan "Sir", would you? 2 A. I wouldn't. 3 Q. No. 4 A. Maybe now. 5 Q. Yes. So, can we go now to paragraph 5: 6 "Levy persuaded us not to execute the 7 warrant declaring after consulting with 8 leading UK Silk that he would hand over the 9 material we required voluntarily. At his 10 request, I personally conducted a 11 rudimentary and cursory search of his office 12 and his home." 13 A. His home office - 14 Q. "And home office", thank you. 15 A. That's correct. 16 Q. So, do you agree with me therefore that if 17 anybody did any persuading of you on that 18 day, it was Mr Levy not to execute the 19 warrant - it was Mr Levy and no nefarious 20 external interference? 21 A. Yes. 22 Q. Thank you. So, yesterday you also said 23 that it would have raised concerns to you to 24 know that on 13 May 2020 the Attorney 25 General had met with the lawyers for Mr</p> <p style="text-align: center;">Page 17</p>	<p>1 declared to the Attorney General that he was 2 a beneficial owner in this company. 3 Q. Yes. Are those matters for you, Mr 4 Richardson? 5 A. You asked me, sir, what was in my mind 6 and I have answered explaining why that was 7 in my mind. 8 Q. Yes. I am not going to take up any of my 9 limited time reminding you that the AG 10 would have known all of that but anyway, 11 never mind. Were you aware, Mr 12 Richardson, that this was the meeting - that 13 this meeting was on the back of a request by 14 Mr Baglietto to meet with both the Attorney 15 General and the Commission of Police 16 together? So, if you want to see that, B4408. 17 Yes, if we go to the previous page just to see 18 what the email is, from Lewis Baglietto, 19 "Dear Attorney" and you go down to the 20 bottom, the last paragraph, please, Mr Triay, 21 of the email. We see there, with you and the 22 RGP, etc, and were you also aware, Mr 23 Richardson, that Mr McGrail initially agreed 24 to attend that meeting but then thought better 25 of it? Are you aware?</p> <p style="text-align: center;">Page 19</p>
<p>1 Levy, namely Mr Baglietto and Mr Moshe 2 Levy, Mr James Levy's son, neither of whom 3 were suspects in your investigation, were 4 they? 5 A. Sorry, who did he meet with? 6 Q. Mr Lewis Baglietto and Mr Moshe Levy. 7 A. No, they weren't suspects, but Mr Lewis 8 Baglietto was a partner at Hassans and 9 thereby had a beneficial ownership in 36 10 North by virtue of their ownership of Astelon 11 Limited. 12 Q. And that disqualifies them from 13 representing people involved in your 14 investigation? 15 A. For my mind - and obviously there are 16 lots of lawyers here that might have a 17 different view - that represents a conflict of 18 interest. 19 Q. Does it? 20 A. Yes. 21 Q. Is it a conflict of interest relevant to you? 22 A. Well, it was something that would have 23 created suspicion in my mind, yes. 24 Q. So - 25 A. I wonder whether Mr Baglietto had</p> <p style="text-align: center;">Page 18</p>	<p>1 A. Yes, I am aware of that. 2 Q. So, Mr McGrail's first instinct was that it 3 was as wrong as you are now suggesting. Do 4 you agree with that? 5 A. I do agree with that. 6 Q. Yes. Did you have a hand to play in 7 changing Mr McGrail's mind? 8 A. I did. 9 Q. Was it you who told the Commissioner of 10 Police that this would be inappropriate? 11 A. It was. 12 Q. So, your judgements differ on that then? 13 A. Sorry? 14 Q. Your judgements, your personal 15 judgements, differed on that? 16 A. Yes. 17 Q. Why do you think it is wrong, Mr 18 Richardson, for the Attorney General, who is 19 the custodian of the public interest, to meet 20 with lawyers representing suspects in police 21 investigations? 22 A. Because at that point we were in the 23 midst of a very serious criminal 24 investigation. We had attended Hassans and 25 sought and obtained the consent of Mr Levy</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 to interrogate his devices. Soon after that the 2 consent was withdrawn and allegations were 3 made before the magistrates' court against us. 4 Q. I see. So, your view appears to be that 5 the fact that somebody is a suspect of the 6 RGP in an RGP criminal investigation 7 disqualifies them instantly from access to the 8 Attorney General when they are making a 9 complaint about the legality of something 10 that the police has done in that very 11 investigation? 12 THE CHAIRMAN: No, his objection was 13 not to the attendance of Mr Baglietto and the 14 Attorney. His objection was to the 15 attendance of the Commissioner of Police at 16 the same time. That is why the 17 Commissioner of Police backed off. 18 SIR PETER CARUANA: Sir, that is not my 19 understanding of the purport of 20 Mr Richardson's evidence. Mr Richardson's 21 evidence is that he thinks that it was 22 inappropriate for the Commissioner of 23 Police, and indeed inappropriate for the 24 Attorney General to have attended that 25 meeting.</p> <p style="text-align: center;">Page 21</p>	<p>1 concern about the meeting in question 2 between the Attorney General, Mr Baglietto 3 and Moshe Levy - 4 THE CHAIRMAN: No, no, no. His 5 objection is to the attendance of the 6 Commissioner of Police. 7 SIR PETER CARUANA: I am trying to 8 reformulate the question, sir. 9 THE CHAIRMAN: Right. 10 SIR PETER CARUANA: I am just trying to 11 clarify that that is his evidence now. (To the 12 witness) Because yesterday your position 13 was that you were really very concerned and 14 I think you used the phrase, "I'm surprised 15 we didn't bump into each other" - 16 A. Sorry? I don't recall saying that. 17 Q. Yes, that was - 18 A. Mr Caruana, I don't recall saying that. 19 Q. Reading from the transcript of your 20 evidence yesterday at page 220, top line: 21 Answer: "It would have raised concerns". 22 So, Mr Wagner said, "Sorry, sir" - where are 23 we here? Where is the question? Yes. "... 24 Mr Levy's son." "If you had known that the 25 Attorney General met just before he met with</p> <p style="text-align: center;">Page 23</p>
<p>1 THE WITNESS: No, that is not so. 2 SIR PETER CARUANA: Oh, you do not 3 believe it was inappropriate? 4 A. I - 5 Q. So, why level criticism at him then? 6 A. Mr Caruana, you just made a very long 7 statement about what you thought that I said. 8 What I said was when the Commissioner told 9 me that he had been invited to a meeting with 10 the Attorney General and with Mr Baglietto, 11 I said I don't think that's an appropriate thing 12 to do. The reasons for that were because Mr 13 Baglietto was a partner of the firm's and 14 therefore a beneficial owner of the 15 conspiracy case that we were investigating. 16 Q. I see. So, are you saying that your 17 evidence is that your concern is actually only 18 about the Commissioner of Police's 19 attendance; you have no concerns about the 20 Attorney General's attendance at such a 21 meeting? 22 A. I'm sorry, I don't understand that. 23 Q. The question is relatively straightforward, 24 Mr Richardson. Is it your concern therefore 25 - is it your evidence now that your only</p> <p style="text-align: center;">Page 22</p>	<p>1 you with Moshe -- with Mr Levy's son and 2 his lawyer", and then you intervened, sir, 3 "You've asked that question already". Mr 4 Wagner said, "Sorry, sir, I had not finished 5 the question yet. Would that have concerned 6 you?" and you answered, "It would have 7 raised concerns. I would have been curious 8 as to what the AG was meeting -- because if 9 it isn't just Mr Levy's son, it's another partner 10 of the same firm that was under 11 investigation." It is perfectly clear that you 12 were levelling criticism at the Attorney 13 General meeting -- 14 A. What I was doing is expressing surprise. 15 I didn't know any of this at that time. 16 Q. Is it not a fundamental pillar of the rule of 17 law as well that people are innocent until 18 they are proven guilty, however much the 19 RG, the police, may suspect them of this or 20 that? 21 A. That is true. 22 Q. So, what is the harm with the Attorney - 23 just the fact that you are suspicious of 24 somebody does not disqualify them from 25 accessing the Attorney General, does it?</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 A. I am not saying that it does. 2 Q. Then why do you criticise the Attorney 3 General for doing that? 4 A. I'm saying that it raised a concern in my 5 mind because you asked that question. 6 Q. Yes, but you raise concerns in the minds 7 in answer to Mr McGrail's lawyer's questions 8 in order to - you are not saying this here in 9 an inquiry about Mr McGrail's retirement 10 because he was allegedly hounded out of 11 office for interference with an investigation 12 because you have some esoteric concern. It 13 is perfectly clear why you gave the evidence. 14 Can we move - 15 MR GIBBS: Was that a question? 16 THE CHAIRMAN: No, it was an 17 observation. 18 SIR PETER CARUANA: Okay. I will 19 move on, sir. I could make it a question, but 20 it is not. 21 THE WITNESS: Sir, would you like me to 22 answer a question? 23 SIR PETER CARUANA: Please do. 24 THE CHAIRMAN: No, it was not a 25 question, I think.</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. Principally by the Attorney. Not 2 principally by the DPP? 3 A. No. 4 Q. No, and not by both? 5 A. There were some times when Mr Rocca 6 was supporting the AG's views that was 7 slightly different to the views that he's 8 expressed to us before that. 9 Q. I see, okay. Well, we are going to be 10 reviewing some of this material now. Do 11 you accept that the meetings were because of 12 Hassans' legal challenge, (a) to the warrant 13 process and (b) that they had made serious 14 accusations against yourself, actually - I 15 cannot remember what they had alleged you 16 had done, probably abuse of office, or 17 something, misfeasance in public office. Do 18 you remember that you were understandably 19 irritated by that? 20 A. I do. 21 Q. Yes, and that you and the Commissioner 22 of Police had sought the legal assistance of 23 the Attorney General and the Director of 24 Public Prosecutions about. Do you accept 25 that that is what these three meetings were</p> <p style="text-align: center;">Page 27</p>
<p>1 SIR PETER CARUANA: So, yesterday, Mr 2 Richardson, you said that you had been put 3 under pressure to adopt a different position 4 with Mr Levy than with others. Do you 5 remember that? 6 A. I remember the discussion about - yes. 7 Q. And you also used the phrase, which I 8 found interesting - you were moving and 9 being moved, so the moving would have 10 been voluntarily, presumably, and the being 11 moved presumably suggests less degree of 12 voluntariness. Is that correct? Is that what 13 you meant by moving and being moved? 14 A. What I was saying was that we started off 15 with one position and at the end of those 16 three meetings we ended up being at some 17 variance to that. 18 Q. Yes, and we are just coming to all of that, 19 thank you. That has saved me some 20 questions. By whom were you being moved? 21 A. Principally, I think, by the Attorney 22 General. 23 Q. Principally by the Attorney - that is your 24 evidence? 25 A. Yes.</p> <p style="text-align: center;">Page 26</p>	<p>1 about on the 13th, 15th and 20 May? Do you 2 accept that? 3 A. The first meeting started off with, "Why 4 did you use the most oppressive means to 5 obtain evidence from Mr Levy". 6 Q. Yes. 7 A. The focus was on the warrants and on Mr 8 Levy's attendance at the police station. 9 Q. Yes. Do you accept - just say yes or no - 10 it really does not matter to me which you say 11 - do you accept that the reason and purpose 12 of the meetings was what I had said, the fact 13 that you had received these allegations and 14 these challenges from - and that you had 15 engaged the Attorney - you and the 16 Commissioner, then Commissioner Mr 17 McGrail, had engaged with the Attorney 18 General and with the DPP in the context of 19 those legal challenges, yes or no? 20 A. I can't answer with a yes or no question, 21 Mr Caruana, because the Attorney General 22 stated in the meeting what the purpose of that 23 meeting was for. 24 (10.30) 25 Q. All right. Can we move to B118, the</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 transcript of the meeting of 13 May. I will 2 steer you to where - I became momentarily 3 distracted. At the very top. Mr Llamas, "I, I, 4 I think Ian to be honest with you Ian, we are 5 meeting with ... because you have rightly 6 sought our legal advice, anticipating what 7 most certainly is going to come." 8 A. My understanding -- 9 Q. Do you agree? 10 A. No sir. My understanding is it was that 11 the Attorney General asked us to attend that 12 meeting, not that the Commissioner had 13 asked to attend that meeting. 14 Q. The question is not who asked to attend 15 the meeting; the question is whether you had 16 sought their legal advice. 17 A. Not for -- 18 Q. This is not a diary management 19 conversation. 20 A. Again, it depends where this line appears 21 in the transcript. 22 Q. Okay. 23 A. We had not, it's the one thing that struck 24 me when I read the transcript was we had not 25 sought the Attorney General's advice on this</p> <p style="text-align: center;">Page 29</p>	<p>1 benefit of the non-Spanish speakers here, 2 there is not enough to start with James Levy. 3 Could we possibly", that is Mr Rocca and Mr 4 Grail, "we have to so that afterwards", Mr 5 Rocca says "Fine", Mr McGrail, "in the 6 fairness, in the interests of the fairness of the 7 others", Mr Rocca, "I totally agree with you, 8 and that, and that ...", and you say, "Because 9 (inaudible) on Monday, because if Heine" 10 (Mr Levy) "comes up with an explanation", 11 Mr Rocca, "Ah, that's it", and you carry on, 12 "that holds enough water that doesn't need 13 probing too deeply, this could be put to bed." 14 And the Attorney General then at that stage 15 intervenes in a conversation he had not 16 initiated, "That is my point. In the end the 17 game is, by this you mean James Levy's 18 information?" And you said, "Yes." And Mr 19 Llamas says, "I mean, the case is still there." 20 This is Mr Llamas saying, "I mean, the case 21 is ..." and you say, "Yes." Mr Llamas 22 answers, "How I mean, where are we ... are 23 we ... where are we going with this? It's a 24 ... it's a fundamental question to ask. Where 25 are you going next? I would say so now</p> <p style="text-align: center;">Page 31</p>
<p>1 matter. We had sought the DPP's advice on 2 that matter and the AG had invited us to a 3 meeting after Mr Levy's arrest -- I beg your 4 pardon -- after the attempt to execute a 5 search warrant. 6 Q. I see. Do you want to read what Mr 7 McGrail answers on the very next line? 8 A. I shall. 9 Q. Well, just do so. 10 A. Yes. 11 Q. Confirming what the Attorney General 12 had just said. 13 A. That doesn't necessarily mean that. It 14 could be just -- 15 Q. Oh I see, yes may mean no, you mean? 16 A. No, it doesn't mean yes meaning no. 17 People say "yeah" encouraging someone to 18 carry on talking, not necessarily indicating 19 that they agree with what has been said. 20 Q. All right. Can we move to B129, at the 21 top there. This is not the Attorney General 22 speaking. This is the Director of Public 23 Prosecutions, "We are going to get to a stage 24 where we are gonna go through pain, pain, 25 and actually aqui no hay bastante, for the</p> <p style="text-align: center;">Page 30</p>	<p>1 what?" Do you agree? In addition to your 2 interventions, which do not sound -- do you 3 agree that it doesn't sound as if you were 4 under a huge amount of pressure or 5 interference with your interventions in that 6 conversation? 7 A. No, I don't agree with that. 8 Q. You don't agree, but if you were under 9 pressure, it was from Mr Rocca, wasn't it? 10 A. I think you would have to read the whole 11 transcript and see how the position changed. 12 I don't know where in this transcript the line 13 is, how far into the meeting it was. 14 Q. No, no, okay. 15 A. What had been said before. 16 Q. Yes, but we are not talking about one 17 line. I am certainly going to encourage the 18 Chairman to read. In my opinion, the 19 transcript of these conversations is where the 20 case against Mr Llamas falls, precisely by 21 reading them all and not the selected 22 quotations out of context that are used 23 against him. 24 A. Sir, I have no case against Mr Llamas. 25 Q. No, well, okay. That is for others to</p> <p style="text-align: center;">Page 32</p>

<p>1 judge and not me, thankfully. Can we turn to 2 B131, a letter just to point out in the middle 3 there, that a letter arrives from Hassans 4 whilst the meeting is in progress, and the 5 meeting then goes on in the middle there, Mr 6 Llamas says, "This has just arrived." I do not 7 want to dwell on that in the interests of time. 8 But just so that we are aware as we go 9 through this document, that that letter has 10 arrived. The meeting then discusses the new 11 allegations made in the letter, and if you 12 could go to page B136 in the middle, "One of 13 the things that we are saying is we are going 14 to challenge the legality of the seizure of the 15 device. Don't look at it." Mr Rocca, the 16 DPP, against whom you level no criticism at 17 all, the DPP therefore, not the Attorney 18 General, says, "I think there is a simple ...", 19 because the conversations I have skipped 20 over is about how to answer this letter and 21 Mr Rocca says, "I think there is a simple way 22 to defuse that paragraph, that is concerning 23 paragraph. You've certainly picked up, I 24 would reply saying 'Given the allegations 25 you are making, we'll sit the seven days. It's</p> <p style="text-align: center;">Page 33</p>	<p>1 A. Yes. 2 Q. Did you give Mr Levy a week to get 3 ready to prepare his position in the hope that 4 it would enable him to not have to be 5 arrested, under pressure from the Attorney 6 General? 7 A. No. 8 Q. Or was that your own decision? 9 A. No. No, I didn't give him a week to 10 prepare under pressure from the Attorney 11 General. We had given him a week to 12 prepare when we attended on the 11th with 13 the search warrant. 14 Q. Yes exactly. Exactly so. Then at B143, 15 four dialogue boxes, your long dialogue box 16 at the bottom just a bit further down, just to 17 point out to you, the two lines at the very 18 bottom, you say, "It doesn't mean to say that 19 we couldn't delay the examination of that 20 phone for enough time until everything else 21 is resolved." Did you say that under pressure 22 from the Attorney General? 23 A. Can I read the paragraph that it is part of? 24 Q. Yes, but please as quickly as you can 25 because I am on the clock.</p> <p style="text-align: center;">Page 35</p>
<p>1 in a sealed bag. It will not be touched. If 2 you think you have grounds for making legal 3 application to any court for review, for an 4 appeal' ...", and then Mr McGrail intervenes, 5 do you agree that that is Mr Rocca 6 suggesting that the way to deal with that 7 paragraph in Hassans's letter was to offer a 8 seven day standstill for want of a better 9 word? 10 A. Yes. 11 Q. Okay, thank you. If you turn to page 12 B141, do you see there about five dialogue 13 boxes down, Mr Llamas says, "So your 14 position remains the same, is that you are 15 going to interview him on Monday." You 16 say, "Assuming he voluntarily attends and if 17 he doesn't that puts us in an impossible 18 position." Mr Rocca interjects, "Because you 19 then have to arrest him." And you say, "We 20 have to arrest him. I'm hoping that we don't 21 get to that. This is why he has been given a 22 week to get ready to prepare his position." 23 Do you remember speaking yesterday, Mr 24 Richardson, about people not being treated 25 differently?</p> <p style="text-align: center;">Page 34</p>	<p>1 A. I shall try, sir. (Pause) Sorry, and the 2 question was? 3 Q. The question was that that was not under 4 pressure from Mr Llamas? 5 A. That is correct. 6 Q. Thank you. B153. Mr Llamas says 7 there, second box at the top, "Shall we wrap 8 up, so, and as far as I understand what we've 9 discussed is that Paul is going to reply to the 10 letter, reply to the ..." letter, that was under 11 discussion in the meeting, and Mr McGrail 12 says, "No, I will. I will", and the 13 conversation carries on in that vein. Mr 14 Llamas says, "In relation to the first 15 paragraph after the seventh point saying that 16 no material has been improperly downloaded 17 until after the interview", and you say, "Can 18 you please go a bit slower coz I want to make 19 sure that I have an accurate record of what 20 we have agreed. No material has been 21 downloaded." Do you accept that what had 22 taken place in that meeting was a discussion 23 between the participants which came to an 24 agreement between them as to the best way 25 to see off the Hassans's challenge?</p> <p style="text-align: center;">Page 36</p>

<p>1 A. At that point in the meeting, yes. We 2 were discussing a letter that had been 3 delivered to me in the middle of that meeting 4 by a messenger from Hassans. 5 Q. Well, the meeting is about to wrap up. 6 This is the wrap up comment. Indeed, so 7 much is it the wrap up comment that what 8 happens thereafter is a matter for Mr McGrail 9 and not for you for tomorrow. 10 A. Sir. 11 Q. So, do you agree with me, Mr 12 Richardson, that it is not correct to 13 characterise this meeting and the Attorney 14 General's purport and the respective roles 15 played by all the participants and the 16 agreements and indeed your own role, that it 17 is not fair to characterise this as the Attorney 18 General interfering improperly with a live 19 criminal investigation, or, worse still, with 20 the application of the rule of law for the 21 upholding of which he is primarily 22 responsible. Do you accept that? 23 A. I can tell you, sir, that I had concerns 24 about that meeting. 25 Q. Yes. Did you express those concerns to</p> <p style="text-align: center;">Page 37</p>	<p>1 precaution of listening to the tape to the end 2 and what you are about to hear is part of 3 what that recording picks up. Are we in 4 trouble? I can just read the paragraph from a 5 transcript which I am happy to circulate in 6 much the same vein as Mr Wagner did 7 yesterday. 8 MR WAGNER: Sorry, I just want to ask is 9 in English? 10 THE CHAIRMAN: What is the answer? 11 That is a perfectly sensible -- 12 SIR PETER CARUANA: The answer is that 13 it is in English. From the moment that ... 14 (Audio played) Can we scroll to the top of 15 the third page so that people can follow it. 16 (Audio played) You can stop there. Just to 17 demonstrate that it is a transcript from the 18 audio. Do you agree that it says, can we 19 have the transcript back on the screen, "Oh, I 20 think it has been." You had been asked, 21 "Well, do you think it's gone ... it could have 22 gone worse, no Paul?" And you answer, 23 "Oh, I think it has been. I think, I think all 24 credit to Michael", Llamas, the Attorney 25 General, "when you go into these things</p> <p style="text-align: center;">Page 39</p>
<p>1 anybody? 2 A. To the Commissioner. 3 Q. When? 4 A. It must have been after the meeting. 5 Q. When after the meeting? 6 A. I couldn't tell you exactly when I 7 discussed it with the Commissioner after that 8 meeting. I think after that meeting the 9 Commissioner spent some time with Mr 10 Llamas on his own and later on I met with 11 him and we went up in his car back to his 12 office. So it was probably at that time. 13 Q. What, in the car? 14 A. Possibly. 15 Q. Okay. We are just coming to that. Can 16 we put the transcript -- just a second, before 17 you do -- never mind, put on the transcript, 18 yes, the audio. Sir, the position here is this. 19 Mr McGrail recorded this meeting. Mr 20 Richardson did not know it at the time. The 21 tape recording actually continued to run, 22 presumably the phone was in his pocket, 23 during the car journey. Of course, that part 24 of the conversation is not recorded in Mr 25 McGrail's transcript, but we have taken the</p> <p style="text-align: center;">Page 38</p>	<p>1 logically and rationally", IM interjects, 2 "Yeah", "and he sees the strength of the 3 argument, he doesn't, he doesn't bully into 4 saying this is not right. He sees the argument 5 and tries ways around it but then accepts it." 6 Do you accept that that is a fair 7 characterisation in a transcript presumably of 8 which you were not aware that you were 9 being recorded, that was your immediate 10 reaction, Mr McGrail, you are quite right, 11 had stayed behind to discuss other things 12 with Mr Llamas about the events of the 13 previous day, and you got into the car, he 14 came down, got in and you drove off together 15 and that was when this conversation took 16 place? Do you think that that is a reasonable, 17 most contemporaneous, instinctive therefore 18 and most likely to be true, assessment by you 19 of the Attorney General. No suggestion of 20 pressurising, of bullying the contrary or 21 being forced or interference or anything of 22 the kind. 23 A. Yes. 24 Q. You agree? 25 A. I agree with what you've just said, yes.</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 Q. Okay.</p> <p>2 THE CHAIRMAN: What is the reference to</p> <p>3 that page?</p> <p>4 SIR PETER CARUANA: Sir, it is not -- can</p> <p>5 we hand it in. It has already been handed in.</p> <p>6 We can give an immediate copy. (Handed)</p> <p>7 Moving, sir, with your permission to the</p> <p>8 meeting of the 15th, could we go to B236</p> <p>9 and again quickly, because I want to ... So,</p> <p>10 the purpose ... 236, if we could go to the</p> <p>11 bottom, the very bottom, and Mr Llamas is</p> <p>12 explaining about half six lines down into that</p> <p>13 long dialogue box, "And therefore", so he</p> <p>14 says, "Okay chaps, Christian and I have been</p> <p>15 spending quite a bit of time together today.</p> <p>16 We're heading towards a major collision</p> <p>17 here." A few lines, "Therefore", skipping</p> <p>18 four lines, "Therefore, we think that's best</p> <p>19 avoided. We think, we just wanted to discuss</p> <p>20 with you now whether there are things we</p> <p>21 can do where you can achieve what you</p> <p>22 wanted to achieve, erm, whilst avoiding a</p> <p>23 collision or whether your maintain</p> <p>24 yourselves in exactly the same position as</p> <p>25 you were the last time we met. I want us to</p> <p style="text-align: center;">Page 41</p>	<p>1 into place that we go as we are meaning to go</p> <p>2 and he provides a no comment." And you</p> <p>3 say, "Sorry, sir to interrupt you, I've ... I've</p> <p>4 had a thought. If that's the case, get him to</p> <p>5 submit his version of events, don't come in</p> <p>6 for interview under caution where you're not</p> <p>7 going to ask for and we're not going to ask</p> <p>8 for it, give us your version of events." Mr</p> <p>9 Llamas says, "In writing?" And you say,</p> <p>10 "Yes." The Commissioner says, "But, let me</p> <p>11 look at it because eventually, eventually, you</p> <p>12 want to ask questions on that version." So</p> <p>13 Mr Llamas says, "Just a second, so what does</p> <p>14 that ..." Superintendent, "Mechanism. What</p> <p>15 mechanism?" "Yes." "Explain to me how</p> <p>16 that works." And you go on to explain your</p> <p>17 own idea, your own thought to the Attorney</p> <p>18 General. Is that correct?</p> <p>19 A. That is correct.</p> <p>20 Q. Thank you. Then at B241, half way</p> <p>21 down the page at 19.33, Mr Rocca, the</p> <p>22 Director of Public Prosecutions, "If you were</p> <p>23 to give a witness statement or a statement</p> <p>24 which is cooperative rather than under</p> <p>25 caution, all of that automatically comes</p> <p style="text-align: center;">Page 43</p>
<p>1 have a completely relaxed discussion</p> <p>2 between the five of us on the handling of this</p> <p>3 and the best way to get to where you feel you</p> <p>4 have got to get, so with that in mind, what ...</p> <p>5 has your position changed in any way since</p> <p>6 we met?" Then he said in Spanish, "I can't</p> <p>7 even remember", words to the effect, "I can't</p> <p>8 even remember when that was." The</p> <p>9 Commissioner of Police says, "Yesterday",</p> <p>10 which actually it probably wasn't, and Mr</p> <p>11 Richardson, astute as ever, corrects him to</p> <p>12 say that it was the day before and he was</p> <p>13 quite right. So, that's just to found this</p> <p>14 meeting. Do you agree, that that is what he</p> <p>15 said he was calling the meeting for and that is</p> <p>16 how he opened that meeting?</p> <p>17 A. Yes.</p> <p>18 Q. So at B239, there was a discussion again</p> <p>19 about whether the RGP was still in the same</p> <p>20 place as had been agreed two days before at</p> <p>21 the meeting on the 13th. And at the bottom,</p> <p>22 the Commissioner of Police in the second last</p> <p>23 dialogue box, "But, but I am saying, looking</p> <p>24 at it from our activity, imagine the dilemma</p> <p>25 of doing it under caution or not, doesn't come</p> <p style="text-align: center;">Page 42</p>	<p>1 disclosable and if you were to proceed</p> <p>2 against (... reading to the words ...) and the</p> <p>3 others, if he provides just a statement to us</p> <p>4 but not under caution", this is Inspector</p> <p>5 Wyan, "it is inadmissible ..." he may not be</p> <p>6 sitting there any more, yes he is, we had</p> <p>7 provided him that. And the Commissioner</p> <p>8 said, "That's one option." And Mr Llamas</p> <p>9 says, "Wait, so one option is a written</p> <p>10 statement 'volunteered' by Mr Levy for</p> <p>11 Monday?" He was trying to come to terms</p> <p>12 with your own idea, "before Monday or by</p> <p>13 Monday, then what do you do?" And you</p> <p>14 say, "We would have to see what the content</p> <p>15 of that was. See how it matches with the</p> <p>16 evidence that we know and then decide</p> <p>17 whether we need to put that to him in an</p> <p>18 interview. If he gives an explanation, and I</p> <p>19 have to be honest, which is very unlikely that</p> <p>20 that would support a lot of the allegations</p> <p>21 that we need to explore, there might not be a</p> <p>22 need to speak to him, but it is very unlikely.</p> <p>23 The only other way round is to provide him</p> <p>24 effectively with the issues." You said, "But</p> <p>25 that really would be a travesty." But that</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

1 again, first of all, is an initiative initiated by
 2 Mr Rocca, explained by you to the Attorney
 3 General in terms which included no protest
 4 of any kind. Do you think that that reads like
 5 an Attorney General who is interfering in the
 6 operation and independence of your
 7 investigation, Mr Richardson?
 8 **A. Sir, what I can tell you is that the**
 9 **paragraph that you've quoted was preceded**
 10 **by others and that meeting started with, I**
 11 **think, "We agree with you that Mr Levy**
 12 **needs to be interviewed, but what we can't do**
 13 **or what he doesn't want to do is to be**
 14 **interviewed under caution." Then there was**
 15 **discussion of that and, after we had listened**
 16 **to the Attorney General, and at that point the**
 17 **DPP saying that if we didn't interview other**
 18 **than under caution, we would not get**
 19 **anything or not, that is how the position came**
 20 **to there. At the end of the paragraph that was**
 21 **left off, I did express a concern there,**
 22 **because I said, "I don't think we'd be**
 23 **prepared to do that." This is in relation to**
 24 **disclosing what evidence before the**
 25 **interview.**

Page 45

1 Q. Yes, the issue is not whether you
 2 expressed concerns. There was a lot of
 3 discussion, a lot of people expressed
 4 concerns, even Mr Llamas about some
 5 things. What I am trying to demonstrate to
 6 you, Mr Richardson, is that your
 7 characterisation of these three meetings with
 8 the Attorney General as the actions of a serial
 9 improper interferer, is just not borne out by
 10 the reality. That is what I am trying to put to
 11 you. Can I put to you B242. So this is the
 12 still Attorney General, the alleged interferer,
 13 the Attorney General, still trying to
 14 understand your idea. "So, a written
 15 statement", in the middle of the page, "So, a
 16 written statement which he gives you by
 17 Monday, doesn't go to the interview. This is
 18 instead of the interview?" And you say, "It's
 19 like an interim measure. It's not the end of
 20 it." Mr Llamas says, "Okay. You consider it
 21 and then you take one of two views. You
 22 take the view either that okay he's answered
 23 all the questions we've got for him, or no it
 24 doesn't. We still need to interview him and
 25 that interview, if it were to happen after ...",

Page 46

1 and you say, "Would have to be under
 2 caution." And Mr Llamas says, "Would have
 3 to be under caution." Does that sound to you
 4 like an interfering Attorney General, Mr
 5 Richardson?
 6 **A. In that little extract, no.**
 7 Q. He is not Jekyll and Hyde, is he? He
 8 doesn't sort of change attitudes from page to
 9 page during this meeting. Is that what you
 10 think he does?
 11 **A. I am not suggesting that at all, Mr**
 12 **Caruana.**
 13 Q. Okay, B258. At the bottom, Mr Wyan
 14 has an intervention at B258, "I suppose we
 15 could look at it from the point of view that if
 16 he gives us a witness statement or a
 17 statement that was so useful to us that it
 18 would be, um, in, in the interests to use him
 19 as a witness as opposed to a suspect." The
 20 Commissioner says, "The statement ...", and
 21 then you interrupt him, "What if he ...", this
 22 is you now speaking, another constructive
 23 intervention on your part which I am going to
 24 ask you at the end to accept does not smack
 25 of you feeling under pressure, "What if he

Page 47

1 this weekend, he sends us a witness
 2 statement saying, 'I am aware that I am under
 3 the suspicion and that the police are carrying
 4 out an investigation in the matter.
 5 Notwithstanding this, I have chosen to make
 6 this statement voluntarily on my own free
 7 will and he sets out his stall, and he sets out
 8 his stall, incriminating Cornelio, Perez."
 9 And the Attorney General says, "Or not."
 10 And you say, "Well, he's going to have to do
 11 it." And Mr Llamas says, "So Paul, if he did
 12 that, say on Sunday or Monday morning",
 13 and you say, "We would not carry out the
 14 interview, well, we could ... we should but
 15 we could delay carrying out any interview
 16 until we've considered the content of that. If
 17 it was sufficiently robust, we could discuss it
 18 with Chris." Chris is the Director of Public
 19 Prosecution, Christian Rocca. Mr Llamas,
 20 "Well, let's combine the various options that
 21 we have. He could out of the blue send you a
 22 witness statement by 10 o'clock on Monday.
 23 What time's the interview?" Do you agree
 24 with me that that is exactly the sort of
 25 exchange between five men, collaboratively

Page 48

<p>1 trying to find a way forward out of the legal 2 challenge, the fact that you were agreeing to 3 give him time to launch a legal challenge 4 before looking at his device, whilst leaving 5 the RGP's freedom to conduct the 6 investigation thereafter as it chose. Do you 7 accept that that is the tenor of what was being 8 discussed and agreed? 9 A. I do. 10 Q. Yes. And that further down, if you could 11 go to B260, you start discussing the "helpful 12 things that he could provide", and you 13 therefore in the middle of the page, "Yes, the 14 file for 36 North, the money that they lent 15 them, that sort of the investment." Mr 16 Llamas says, "Hold on, then you consider the 17 statement and then what happens next?" The 18 Commissioner says, "Well, we evaluate it, 19 whether like Paul said, robust enough, where 20 we think okay we're happy with that and he 21 has given us ... he is a witness." Inspector 22 Wyan says, "His value as a witness and you 23 say, "That I would be happy with." 24 Happiness is a curious sentiment to express -- 25 to find on the lips of somebody who feels he</p> <p style="text-align: center;">Page 49</p>	<p>1 As a team, Chris." Do you agree with that? 2 A. Sorry, was there a question there, Sir? 3 Q. Yes, do you agree with that? 4 A. Do I agree with what, that paragraph? 5 Q. With the fact that the Commissioner of 6 Police described what would happen 7 thereafter, after this agreed course of action 8 would be a tactical decision on their part, if 9 you decided to switch him from suspect to 10 witness for all the reasons that we have just 11 been reviewing together? The Commissioner 12 described that as that would be a tactical 13 decision on their part. Do you agree? 14 A. I agree that he said that, yes. 15 (11.00) 16 Q. Yes. Okay. I am just going to leave it 17 there, because I think the essence of it is 18 clear, and move on. The meeting of 20 May. 19 So having had this explained to them, the 20 agreement was seven days and give us a 21 statement not under caution, a letter came in 22 did it not, from Hassans which, am I right - 23 do you agree that it effectively said: ah, if 24 you are asking us for a witness statement not 25 under caution it must be that we are no</p> <p style="text-align: center;">Page 51</p>
<p>1 is being reluctantly dragged where he does 2 not want to go. Do you agree? 3 A. There was a part above that that is in 4 order, but I am not sure what Mr Wyan will 5 say when he said "his value as a witness" -- 6 Q. I do not have time to put the whole 7 transcript to you. If I did, I would, believe 8 me. I don't have time. 9 A. Sir, it is not recorded. It says "inaudible". 10 So I don't know what I was agreeing with. 11 Q. I see, okay. You don't know what you 12 were being happy with, okay. Further down 13 the page, we come to your concern at 14 1.11.13, you say, "But all that other S-H-I-T 15 has got to go away." And Mr Llamas says, 16 "What S-H-I-T? And you say, "The six 17 letters, the Exocets flying across the ...", in 18 other words, the personal allegations of 19 criminal conduct against you. Is that correct? 20 A. That's correct. 21 Q. Then at 261, you refer to, or the 22 Commissioner of Police refers to six 23 dialogue boxes, seven dialogue boxes in the 24 middle, "That is a tactical decision that we 25 take. We consult you. We say yes as a team.</p> <p style="text-align: center;">Page 50</p>	<p>1 longer suspects. Is that right? 2 A. That is correct. 3 Q. Exactly. And, what happened was that 4 this meeting was convened to discuss that 5 very issue, and the Attorney General and the 6 Director of Public Prosecutions immediately 7 agreed with your concern (entirely justified) 8 that it did not have that effect at all, and that 9 the reply would have to make that clear. Do 10 you accept, to save me reading the 11 transcripts, that the Attorney General and 12 DPP immediately agreed that the letter (the 13 response) would have to robustly reject that 14 proposition. 15 A. I can't remember the words that were 16 said, Mr Caruana, but that - the general tone 17 of what you're saying seems correct. 18 Q. I will accept that in the interests of time, 19 because I can deal with this in closing an 20 another occasion. I accept that you, sir, 21 accepted: sounds correct. Okay. And, that 22 nothing more was discussed at that meeting, 23 really it was all about how that letter would 24 be responded to. So, Mr Richardson, moving 25 on quickly to the post Mr McGrail's ceasing</p> <p style="text-align: center;">Page 52</p>

<p>1 to be Commissioner of Police era. 2 A. Mm-hmm. 3 Q. Did you have any further dealings with 4 the Attorney General after your meeting of 5 20 May? In other words, after the third of 6 the three meetings we have reviewed. The 7 third one, admittedly (inaudible) light. 8 A. I did not. 9 Q. You did not? 10 A. No. 11 Q. As far as you are aware, he played no role 12 whatsoever in what decisions were made 13 after 20 May, correct? 14 A. I can't say that -- 15 Q. No, no, as far as you are aware, I am 16 saying. 17 A. As - as - I was - would expect that the 18 DPP would have been briefing the Attorney 19 General on the state of the -- 20 Q. The question is: as far as you are aware. 21 A. As far as -- 22 Q. Either you are aware or you are not. 23 A. I am not aware, no. 24 Q. So, the answer is: no. As far as you are 25 aware, he did not.</p> <p style="text-align: center;">Page 53</p>	<p>1 May, after which the Attorney General had 2 nothing more to do with it, as far as you are 3 aware. So, if we could go from there to 4 paragraph 58, does that suggest to you that 5 you reviewed the evidence that Mr Levy had 6 submitted on 9 June, this evidence that you 7 had promised that you would review to see if 8 it had the effect of converting him from 9 suspect to witness. You reviewed that 10 evidence, do you see, "Following the 11 submission of his account, the material was 12 reviewed". Do you see that? 13 A. I do. 14 Q. And then on paragraph 60, you sought the 15 pre-charge advice from the DPP on 28 16 August, Mr Rocca. Did he advise you then 17 that there was insufficient evidence to 18 proceed against Mr Levy at that time? 19 A. I think it's mentioned in that paragraph, 20 sir. 21 Q. Exactly. So, you agree that that was the 22 position. And, at paragraph 61 he effectively 23 advised you - because of the not enough 24 evidence to proceed at that stage, did he 25 advise you: wait until the stuff comes from</p> <p style="text-align: center;">Page 55</p>
<p>1 A. As far as I am aware, no. 2 Q. Thank you, alright. So, if we could just 3 turn up B3442. No, I may have misquoted 4 the number two: 3432. I may have 5 misspoken. Right, could you just very 6 quickly - this is the so-called Levy report, 7 and that is effectively what eventually goes 8 to the Commissioner, or to whomever it goes. 9 It is actually drafted by Mr Wyan, and it is 10 for your attention. And, you explained 11 yesterday that the practice is that everything 12 gets addressed to the Commissioner. This is 13 why there was a covering email by you to the 14 Commissioner that we spoke about half an 15 hour ago, that you had sent to Mr Wyan in 16 draft for his... Do you remember? 17 A. I don't remember discussing it, but I do 18 know that there was an email that's... 19 Q. Okay, we will come to that. We 20 discussed it in (inaudible). Okay, never 21 mind. So, paragraph one, "This report has 22 been drafted in order to consider whether to 23 search devices obtained from Mr Levy on 12 24 May or whether to return the devices to 25 the owner." This is October, long after 20</p> <p style="text-align: center;">Page 54</p>	<p>1 America to see if there is - if that provides 2 more evidence? 3 A. With -- 4 Q. Is that -- 5 A. We had agreed to do that, yes. 6 Q. You had agreed to do that. So, in the 7 meantime Mr Levy's devices remained sealed 8 in your possession, or perhaps not in your 9 personal possession, in the RPG's custody. 10 A. They were sealed in the Commissioner's 11 safe. 12 Q. Exactly. And then, in October you 13 considered whether Mr Levy remained a 14 suspect and whether his devices could 15 continue to be held, is that correct? 16 A. That is correct. 17 Q. And, you reached the conclusion at 18 B3443, paragraph 63 to 65, "In the light of a 19 point made above and having regard to the 20 evidence reviewed since April 2020, we no 21 longer continue to have reasonable grounds 22 to believe that Levy committed the offence of 23 conspiracy to defraud". And down at 24 paragraph 64, "Given that reasonable 25 grounds no longer exist to suspect Levy of</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 the offence, the legality of now searching the 2 iPhone/iPad for evidence of this offence is in 3 question. The correct course of action", Mr 4 Wyan with your approval said, "is therefore 5 to return the devices to Mr Levy without 6 further investigation of their content." Is that 7 the conclusion to which you came? 8 A. It is. 9 Q. Right. And do you agree that, as far as 10 you are aware, neither the Attorney General 11 not the Chief Minister played any role with 12 you in obliging you to come to that decision? 13 A. I agree with that, yes. 14 Q. And, given some of the things that you 15 said yesterday in evidence, in answer to my 16 learned friend Mr Wagner, implicit in that is 17 that you did not make a decision that you 18 would not have made had you not been 19 aware of the berating that Mr McGrail had 20 got on 12 May. In other words, you did not 21 make the wrong decision for the wrong 22 reason, did you? Yesterday you were 23 explaining to the Chairman the chilling effect 24 that knowing that Mr McGrail had been so 25 berated might have on other police officers.</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. I see, so you are not saying that, you are 2 saying the contrary, that that -- 3 A. I'm saying that it was in my mind, yes. 4 Q. It was in your mind? 5 A. It - it was clearly in my mind that if we 6 carried on with this course of action the same 7 thing might happen to other people that were 8 involved (inaudible) -- 9 Q. Oh I see, whilst telling the Commissioner 10 that the reason was for lack of evidence? 11 A. The reason -- 12 Q. You were actually motivated by personal 13 fear? 14 MR GIBBS: (inaudible) 15 THE CHAIRMAN: I agree. It is important 16 that I ask (?) the question. 17 SIR PETER CARUANA: Yes. Yes. 18 THE CHAIRMAN: I have now forgotten 19 what the question was. 20 Q. Telling the Commissioner (Mr Ullger), to 21 whom this report was ultimately addressed, 22 that this was the reason why you had it right 23 (?) you were saying it was because on the 24 advice of the DPP there was insufficient 25 evidence to proceed. And therefore, the right</p> <p style="text-align: center;">Page 59</p>
<p>1 That was not your case; this decision was not 2 influenced by any such consideration, am I 3 correct. 4 A. That's correct. I didn't know about the - 5 the content of that conversation at the time 6 the police report was written. 7 Q. Given what else is on that tape, given 8 what else is on that transcript that we have 9 just handed out, the accuracy of that answer 10 is for later consideration. And, it was not 11 influenced either by the fact that Mr McGrail 12 had been removed from office. 13 A. What was not influenced by -- 14 Q. The decision here, in paragraph 63 to 65 15 of this document. 16 A. That's harder to say, because if - if we 17 embarked on a course of action, for example 18 if we had forced the issue, I wasn't sure or - 19 or had no idea what the consequences might 20 be because of that. 21 Q. So, are you saying that you felt 22 personally threatened by Mr McGrail, and 23 that is the reason why you came to this 24 decision? 25 A. No, I am not saying that.</p> <p style="text-align: center;">Page 58</p>	<p>1 thing to do - surely you are not saying now, 2 Mr Richardson, that you were misleading 3 everybody that leads this document, and 4 making this decision for the thoroughly 5 improper purpose of protecting yourself from 6 some perceived personal threat to yourself? 7 Surely, that is not your evidence? But, is it? 8 A. I am not saying that; I am saying that it 9 was somewhere in the back of my mind there 10 - there was concerns about that. But, that 11 does not detract from the fact that the DPP 12 had advised that there was insufficient 13 evidence to proceed, that the evidence that 14 we were waiting from the American 15 authorities came very late and did not 16 provide any further information, and 17 therefore we could not take this investigation 18 any further. 19 Q. So, if the information coming back from 20 America had been damning of Mr Levy, and 21 had shown his guilt in your mind and the 22 DPP's mind to a sufficient degree to warrant 23 charging, would you have proceeded against 24 him? 25 A. I think you've missed out a stage there,</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 Mr Caruana. If the evidence had come from 2 America that indicated that Mr Levy had 3 further involvement than we suspected, it 4 would have given us grounds to go and seek 5 a further order to open the devices. 6 Q. Exactly. Regardless of this personal fear 7 and concern lurking somewhere (we do not 8 how far back) in your mind. 9 A. Yes. 10 Q. So, it cannot have been a factor in your 11 decision to the contrary. 12 A. I'm not saying it's a factor in the decision; 13 what I'm saying is that it -- 14 Q. Alright -- 15 A. -- was in the back of my mind. 16 Q. Okay, you are not saying it was a factor 17 in the decision. I just have one more point to 18 put to you, Mr Richardson. Can we go to B 19 just so that you know what it is, to see it 20 again, B3345. You have seen this; this is the 21 thing that you sent in draft to Mr Wyan. 22 A. Sorry? 23 Q. B3445, this is what we discussed earlier. 24 445 - B3445. 25 A. I don't think we've discussed this, Mr</p> <p style="text-align: center;">Page 61</p>	<p>1 discussions that led to the agreement between 2 you all. 3 A. Sir, is this a doc-- is this an email that I 4 sent to the Commissioner, or is this an email 5 that I sent to Mr Wyan? 6 Q. Alright. I explained to you before that I 7 tried to explain that to you, I said it was for 8 your benefit. And, this is - obviously we 9 have not got to the draft of the - we do not 10 have the actual email that you sent to the 11 Commissioner attaching the Levy report. 12 This is an email that you sent to Mr Wyan, 13 "Mark, your views please" and then it says 14 "Sir, please find attached Mark's 15 comprehensive summary of James Levy's 16 statement." So, you were asking Mr Wyan to 17 express his views to you about an email that 18 you were planning to send to Commissioner 19 Ullger, attaching (and presumably 20 explaining) the Levy report? 21 A. Yes. 22 Q. You understand where we are, now? 23 A. I do. 24 Q. Alright, thank you. So, at paragraph 10, I 25 am putting to you that to tell Commissioner</p> <p style="text-align: center;">Page 63</p>
<p>1 Caruana. 2 Q. Sorry? 3 A. I don't think we have discussed that 4 document on screen. 5 Q. Well, there you are. That might remind 6 you that we have. Mark your viewscreens, 7 and it sets out the draft of the email that you 8 would send (?). I am just putting it to you 9 again, we discussed this 35, 40 minutes ago. 10 A. Mm-hmm. 11 Q. Okay? We discussed it by reference to 12 paragraph five. We are taking you now to 13 paragraph five, "Levy persuaded us", that is 14 the context in which I put it to you before. 15 And then, at paragraph ten you were 16 reporting again that, "later that day 17 Commissioner of Police, Attorney General, 18 DPP and I met to discuss the (inaudible). We 19 were persuaded to seal Levy's digital devices 20 until we could deal with the issue of legal 21 privilege." Do you agree, given some of the 22 references that we have seen together now, 23 that that is rather a mealy-mouthed - "We 24 were persuaded" is a rather incomplete 25 characterisation of the nature of the</p> <p style="text-align: center;">Page 62</p>	<p>1 Ullger (who of course had not seen the 2 transcripts of the conversation that we have 3 partially been through) that you "were 4 persuaded" to seal Levy's digital devices, and 5 then the only person that you mentioned then 6 is "the Attorney General had taken offence". 7 In other words, leading surely (do you 8 agree?) - leading Commissioner Ullger to 9 believe that it was the Attorney General 10 taking offence that had been - and therefore 11 he was the person who had persuaded you. 12 But it is clear beyond possibility of doubt, 13 even by your own constructive and helpful 14 contributions to the process (indeed, you 15 suggested the very thing that eventually 16 happened) that to attribute this to some act of 17 unilateral... 18 THE CHAIRMAN: No, you are meant to be 19 asking questions. 20 Q. Do you agree that that is an incomplete 21 characterisation of the way this agreement 22 came about? 23 A. I can't answer that Sir, without reading 24 the whole of that document. 25 Q. Okay. Well, I am hoping that the</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 Chairman will do precisely that: read it all. I 2 am just going to refer you to two more 3 paragraphs. "Further..... ways to explore" 4 and then you go to there, and then you go to 5 the end, if I can just take you to the last two 6 paragraphs. You say, "Based on the evidence 7 that we have, I agree that we no longer have 8 reasonable grounds to believe that the 9 devices held within your safe contain 10 evidence that Levy has committed the 11 offence of conspiracy to defraud Blands. For 12 that reason, I recommend that they are 13 returned without opening." And then you 14 add this paragraph, "This should not be seen 15 as a vindication of Levy's innocence". So, 16 somebody ceases to be a suspect because 17 there is an insufficient evidence against them, 18 and apparently in the state of the rule of law 19 in which we live that is not sufficient for 20 innocence. They live under the cloud of your 21 personal suspicion forever. 22 THE CHAIRMAN: You had better read the 23 whole sentence. 24 Q. I am, I am intending to read the whole 25 sentence. "throughout the investigation,</p> <p style="text-align: center;">Page 65</p>	<p>1 with that. Okay, well thank you for your 2 help, Mr Richardson. 3 MR GIBBS: Thank you. I am thinking only 4 of the witness and the shorthand writer; I am 5 of course completely content. 6 THE CHAIRMAN: No, I think it would be a 7 good idea to have a short break now. 8 MR GIBBS: Thank you. 9 (10.18) 10 (Adjourned for a short time) 11 (10.28) 12 Re-examination by MR GIBBS 13 Q. Mr Richardson, firstly four short matters 14 arising from the questions of this morning. 15 Could we have on screen please A1436. 16 And, this is the question about you reacting 17 to the suggestion that Mr Sanchez might be 18 dealt with disciplinarily. And, you have 19 drawn our attention to three, I think, of these 20 bullet points. If we start - of course, it says 4 21 May but we think that may be a false 22 reference and it is 7 April. "The Chief 23 Secretary would have to provide an 24 additional statement explaining this. I said, 25 how could they not complain." And then we</p> <p style="text-align: center;">Page 67</p>
<p>1 which may have resulted in a different 2 outcome had the warrant been executed and 3 Levy interviewed under caution". And my 4 question to you, Mr Richardson, is this: do 5 you not think it would have been a more 6 complete and fair way to say that paragraph, 7 that it had not been executed on 12 May, not 8 by the intervention of some external black 9 hand but because Levy persuaded you not to 10 execute it? And that later, if it was not 11 executed after 20 May until October (when 12 this happens) it was certainly not to do with 13 the Attorney General, whom you say had 14 played no role in it whatsoever. But, the 15 Attorney General is the only person you 16 mention in this email. You do not mention 17 the DPP; you do not mention Mr McGrail's 18 role in reaching the agreement, or for that 19 matter Mr Wyan's, or for that matter your 20 own. Do you agree that that paragraph 25 is 21 a partial and manifestly incomplete 22 characterisation of what had happened in 23 relation to the execution of the warrant? 24 A. No, I don't agree with that. 25 SIR PETER CARUANA: You do not agree</p> <p style="text-align: center;">Page 66</p>	<p>1 get to, "Caine Sanchez was corrupt, from 2 what we had seen", and Mr McGrail at the 3 meeting, and then, "I apologised to the 4 Attorney General for being frank". What 5 was it that you had been frank about? 6 A. About saying that I believed that Mr Co-- 7 Mr Sanchez was corrupt, from the evidence 8 that we had seen. 9 Q. And by apologising for being frank, how 10 had you expressed yourself? 11 A. I had said exactly that: from what we 12 have s-- how - how could they not complain 13 for - or - sorry, I have mixed up the two lines. 14 This was in relation to the suggestion that Mr 15 Sanchez could be dealt with by a disciplinary 16 route I said: how can we do that, the man is 17 corrupt from what we have seen. 18 Q. Second issue from this morning: the 19 timing of you leaving Hassans on 12 May. 20 How many officers had originally gone to 21 Hassans? 22 A. Two: myself and Mr Wyan. 23 Q. Were other officers involved in the 24 operation that morning? 25 A. There was officers at Mr Hassan's (sic)</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 residence in the area, and there was a 2 technical forensics person. 3 Q. How many officers entered Hassans 4 offices? 5 A. When we - when I went in initially: 6 myself and Mr Wyan only. Later on, the 7 technical officer arrived too. 8 Q. And, how long were you there? 9 A. Not a hundred percent certain. I think it 10 would have been around midday until - well, 11 the time that I left with the Commissioner. 12 Q. When you left, were other officers 13 remaining? 14 A. Mr Wyan and the DC Oton, I think it was, 15 who was the technical officer. 16 Q. And, the technical officer was there for 17 the potential extraction or copying of 18 electronic material from devices? 19 A. That's correct. 20 Q. And, was there a Hassans technical expert 21 on-site as well? 22 A. There was. 23 Q. Why did you leave before Mr Wyan? 24 A. Because I was called back to the station 25 by Mr McGrail.</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. And there is a reference to that in the 2 papers I think, is there not? 3 A. Yes. 4 Q. And was the idea that it would be worn, 5 or that it would be used to record a 6 conversation or any conversation with Mr 7 Levy? 8 A. It wasn't a suggestion at all that it would 9 be worn, because we were wearing plain 10 clothes. 11 Q. Indeed, was your attendance there as 12 discreet as it was possible for you to be, 13 consistent with your plan that day? 14 A. Yes. 15 Q. This is part of the transcript, and you 16 were referred to... If we go to 3475, I beg 17 your pardon. You were referred to the 18 phrase, about three lines down, "I can assure 19 you, with my hand on my heart, that nobody 20 has interfered at all with my conduct in this 21 investigation". What was the context of that 22 comment by you? I am going to ask that the 23 screen be pulled down, so that you can see 24 the -- 25 A. Thank you.</p> <p style="text-align: center;">Page 71</p>
<p>1 Q. And, what was the purpose of Mr Wyan 2 remaining? 3 A. We still hadn't taken possession of the - 4 sorry, we had taken possession of the 5 devices, but they still had not sorted out the - 6 the - how they were going to download the 7 emails. 8 Q. And, how long was it before the last 9 officer or police technical expert left Hassans 10 that day? 11 A. Sorry sir, I don't know that. 12 Q. The third point please, from this morning. 13 If we have on screen B3474. And, this is part 14 of the body-worn... Just on that subject, the 15 body-worn video. Obviously it involves a 16 camera? 17 A. Yes. 18 Q. And many of us will have seen police 19 wearing them, and they can turn them on if 20 they are going to arrest someone, and that 21 sort of thing. Why had you taken a camera to 22 Hassans that day? 23 A. It was on the suggestion of Mr McGrail, 24 to avoid any misunderstanding of anything 25 that may have been said.</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. The other way, I beg your pardon, to the 2 operator. So, you can see what came 3 immediately before it. Here, "Mr Levy". 4 Well, what he says is, "See, this is an abuse 5 of process, and I have to see whether I go 6 with the abuse of process and answer it, or 7 whether I fight the abuse of process." And 8 your answer to the suggestion of abuse of 9 process is, "That's your decision, entirely 10 with you. I can assure you, with my hand on 11 my heart, that nobody has interfered at all 12 with my conduct in this investigation at all." 13 And, could I ask that we see the next few 14 answers. Thank you. Mr Levy, "I accept 15 that, your words. The question is whether 16 there were other interferences, not with you." 17 And you say, "Well, above me is the 18 Commissioner, and I would say - or below 19 you, I don't know. Well, no, definitely not 20 below me, Mark." Mr Wyan was in the 21 room, was he? 22 A. He was. 23 Q. Mark is the Inspector. And, Mr Levy 24 said, "I am not saying anything now, but I 25 know certain things. I have to decide what to</p> <p style="text-align: center;">Page 72</p>

<p>1 do." And, do you know what he meant by 2 that? "I know certain things"?</p> <p>3 A. I didn't then, but I think it came out later 4 on in the - in the transcript.</p> <p>5 Q. The fourth thing please, from this 6 morning, is your statements and how they 7 came to be made. So, the first was a very 8 short matter, everyone in the Inquiry was 9 asked to say something about a data breach. 10 And then the two substantive statements, 11 how did they come to be made?</p> <p>12 A. The - these were - were drafted in 13 consultation with my solicitor. I went over to 14 the UK and met with her there. We 15 exchanged lots of - of communications, and I 16 drafted a statement.</p> <p>17 Q. And, what were they designed to answer?</p> <p>18 A. The questions that had been put to me by 19 STI or CTI.</p> <p>20 Q. And STI, for those who do not know 21 what you mean, are the Solicitors to --</p> <p>22 A. To the Inquiry.</p> <p>23 Q. -- Sir Peter's Inquiry, and the Counsel to 24 the Inquiry. So, questions - a list of questions 25 had been sent to you.</p> <p style="text-align: center;">Page 73</p>	<p>1 from PricewaterhouseCoopers?</p> <p>2 A. I had.</p> <p>3 Q. And, had that been given to you by 4 Blands or by Mr Gaggero?</p> <p>5 A. It had been given to the Commissioner by 6 Mr Gaggero, and the Commissioner gave it 7 to me.</p> <p>8 Q. Was it a comprehensive report?</p> <p>9 A. It was.</p> <p>10 Q. In terms of the seriousness of the 11 consequences of the events that you were 12 investigating, how serious did they seem to 13 you to be?</p> <p>14 A. As serious as they can be.</p> <p>15 Q. In terms of the seniority of the people 16 who appeared to be --</p> <p>17 SIR PETER CARUANA: Sir, I would ask 18 my learned friend (inaudible) and we have 19 not been.</p> <p>20 MR GIBBS: Yes.</p> <p>21 THE CHAIRMAN: Well, we note your 22 caution Sir Peter, but I do not think you have 23 gone too far.</p> <p>24 Q. I hoped I had not, and I am grateful for 25 the intervention. But I was going to say, in a</p> <p style="text-align: center;">Page 75</p>
<p>1 A. Yes.</p> <p>2 Q. A long list?</p> <p>3 A. Yes, a very comprehensive list.</p> <p>4 Q. And, you made a statement in answer.</p> <p>5 A. That is correct.</p> <p>6 Q. And then, later a further supplementary 7 list of questions were sent to you.</p> <p>8 A. That is correct.</p> <p>9 Q. And, you made a statement in answer.</p> <p>10 A. I did.</p> <p>11 Q. And in this process here, by and large, 12 questions have been asked of you. And, have 13 you tried to answer them?</p> <p>14 A. Yes, I have.</p> <p>15 Q. Have you tried to answer any questions 16 that you have not been asked?</p> <p>17 A. I think there may have been some 18 questions during my evidence that weren't 19 covered in my statements.</p> <p>20 Q. I am not going to go back over your 21 grounds to suspect Mr Levy, the Chairman 22 has that already. But just one point, please, 23 about seriousness - the seriousness of what 24 you were investigating or thought you were 25 investigating. Had you received a report</p> <p style="text-align: center;">Page 74</p>	<p>1 short closed session perhaps in a few minutes 2 time, you can describe what you made of the 3 actual messages which were recovered.</p> <p>4 Because, some of them have been restricted 5 by the Government. But I was just asking 6 you in terms of seriousness, about the 7 seniority of those who appeared to be mixed 8 up.</p> <p>9 A. They were - they were senior and 10 respected members of the community.</p> <p>11 Q. With regard to Mr Levy, was one of the 12 first pieces of advice you took as to whether 13 (and I think perhaps from the Director) his 14 involvement was privileged because he was 15 acting merely as a legal advisor, or whether it 16 was not privileged because he was acting as a 17 businessman participant?</p> <p>18 A. That's correct.</p> <p>19 Q. It is the latter, is (?) it?</p> <p>20 A. Yes.</p> <p>21 Q. And, that was the advice from the 22 Director?</p> <p>23 A. There is an entry in my daybook covering 24 that.</p> <p>25 Q. And then, when the beneficial ownership</p> <p style="text-align: center;">Page 76</p>

<p>1 - the ultimate beneficial ownership of 2 Astelon was unpicked, did it turn out that the 3 partners of Hassans had a beneficial interest 4 of some significance in 36 North? 5 A. That is correct. 6 Q. And Mr Levy, as the main (by far) partner 7 of Hassans had ten and a half percent of 36 8 North? 9 A. Or thereabouts sir, yes. 10 Q. And the other partners had 2.94, shall we 11 call it three percent each themselves? 12 A. Some of them, and most of the others one 13 point something. 14 Q. Yes. And so those included, did they, Mr 15 Picardo? 16 A. Yes, they did. 17 (10.41) 18 Q. And his wife. 19 A. I am not sure his wife was a partner at 20 that time. 21 Q. Thank you. Of the other names that we 22 have heard, did they include Mr Mena? 23 A. It did. 24 Q. Of the other names we have heard, did it 25 include Mr Baglietto?</p> <p style="text-align: center;">Page 77</p>	<p>1 Q. The first three arrests were on 10 May 2 2019? 3 A. I think so. 4 Q. And the fourth on 14 May 2019. 5 A. Uh-huh. 6 Q. Do you remember which day it was that 7 Mr Skembury reported back with the detail 8 of the ultimate beneficial ownership? 9 A. If my memory serves me correct, it was 10 14 May. 11 Q. So at the meeting of 13 May 2019 did 12 you have that information? 13 A. Is this the meeting at number 6 Convent 14 Place? 15 Q. Yes. 16 A. No, I didn't. 17 Q. So in that meeting did you know that Mr 18 Levy owned 10.56 per cent of 36 North? 19 A. I did not. 20 Q. At the end of the meeting there is a 21 reference in a document to someone saying 22 that you would need to speak to the senior 23 partner of Hassans? 24 A. That is correct. 25 Q. Who suggested that?</p> <p style="text-align: center;">Page 79</p>
<p>1 A. It did. 2 Q. And Mr Bonfante. 3 A. It did. 4 Q. Both of whom -- 5 A. No, no, sorry, not Mr Bonfante, I don't 6 think. 7 Q. Thank you. So confining ourselves to Mr 8 Baglietto, someone who later came to give 9 legal advice in the context of the warrant to 10 Mr Levy? 11 A. That is correct. 12 Q. The date of the unpicking of the ultimate 13 beneficial ownership of Astelon, was it an 14 officer called Skembury who dealt with it? 15 A. Yes, it was. 16 Q. Did you depute him to do that? 17 A. I did. 18 Q. When had you hoped to have that 19 information by? 20 A. We had hoped to have it in advance of 21 our intervention with the three main 22 defendants. 23 Q. Did you have it in advance of that 24 intervention? 25 A. No.</p> <p style="text-align: center;">Page 78</p>	<p>1 A. The Chief Minister. 2 Q. Was any other partner of Hassans at that 3 meeting? 4 A. Mr Mena was at that meeting. 5 Q. Do you know how Mr Picardo knew that 6 you would need to speak to the senior partner 7 of Hassans? 8 A. No. 9 Q. Examination of the devices following 10 those first four arrests led, if not 11 immediately, certainly within weeks or 12 months to the recovery of messages, is that 13 right? 14 A. That is correct. 15 Q. Did those messages give rise to criminal 16 suspicion regarding Mr Levy? 17 A. It did. 18 Q. The police plan in relation to Mr Levy 19 and progressing the investigation one way or 20 another about his involvement, did that 21 involve seizing his personal devices, 22 examining them for non-privileged material 23 relevant to the offence and interviewing him 24 under caution? 25 A. It did.</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 Q. Were his devices ultimately examined?</p> <p>2 A. They were not.</p> <p>3 Q. Was he ever interviewed under caution?</p> <p>4 A. No.</p> <p>5 Q. In answers to my learned friend Mr</p> <p>6 Santos's questions you made concessions</p> <p>7 about the wording of the information for the</p> <p>8 warrants, the way in which they were applied</p> <p>9 for, whether that was satisfactory, whether</p> <p>10 they were sufficient or not - I am not going to</p> <p>11 go back into those. Can I ask you though</p> <p>12 about the belief at the time, stated in the</p> <p>13 information and to the magistrate, that other</p> <p>14 routes than a search warrant were bound to</p> <p>15 fail, in other words that there was a risk that</p> <p>16 Mr Levy would destroy or conceal the</p> <p>17 content of the devices if he was given notice</p> <p>18 that you were coming to ask him for them.</p> <p>19 What was it that made you think he would do</p> <p>20 that?</p> <p>21 A. Mr Levy had been aware that we had</p> <p>22 arrested the other persons involved in this</p> <p>23 investigation. From the communications that</p> <p>24 we had he seemed comfortable in discussing</p> <p>25 what seemed to indicate an alleged hacking</p> <p style="text-align: center;">Page 81</p>	<p>1 involvement in this investigation.</p> <p>2 Q. If we go down one page, please, I think, I</p> <p>3 am looking for 18 June. Yes, there we are.</p> <p>4 18 June, email from Detective Constable</p> <p>5 Garcia in which he stated he had:</p> <p>6 "A visual inspection of Caine Sanchez's</p> <p>7 Whatsapp chats appertaining to JP, TC and</p> <p>8 JL which are blank, suggesting they were</p> <p>9 deleted. The chat appertaining to AC was</p> <p>10 still present which only shows chats</p> <p>11 regarding the day to day running of BCA.</p> <p>12 Relevance: digital device review</p> <p>13 investigation in relation to CS.</p> <p>14 Consideration that CS may have attempted to</p> <p>15 pervert the course of justice. Need to assess</p> <p>16 when the deletion took place and whether</p> <p>17 consistent with other chat logs."</p> <p>18 Do you remember when the final expert</p> <p>19 forensic report came through?</p> <p>20 A. No, sir, I don't.</p> <p>21 Q. The Sanchez deletion was referred to in</p> <p>22 the meeting of 15 May 2020.</p> <p>23 A. It was certainly mentioned in one of those</p> <p>24 meetings.</p> <p>25 Q. Could we have B278 please? It is in the</p> <p style="text-align: center;">Page 83</p>
<p>1 of the NSCIS system and gave reassurance to</p> <p>2 one of the defendants. We were aware, and I</p> <p>3 do not know if he was aware, that Caine</p> <p>4 Sanchez had deleted some of his messages</p> <p>5 before we managed to speak to him, and I</p> <p>6 think that we took the view that, once bitten</p> <p>7 twice shy, if we don't take these devices</p> <p>8 immediately there is a risk that those will</p> <p>9 also be deleted.</p> <p>10 Q. Could we have please on screen B3068.</p> <p>11 Thank you. I wonder if I have given myself</p> <p>12 the wrong ... Let us do it this way. This is</p> <p>13 Mr Wyan's log of events. Were the devices</p> <p>14 examined forensically?</p> <p>15 A. Which devices, sir?</p> <p>16 Q. From the first set of arrests.</p> <p>17 A. Yes, they were.</p> <p>18 Q. Did you get the answer immediately or</p> <p>19 later?</p> <p>20 A. No, it takes quite some time to get the</p> <p>21 information back.</p> <p>22 Q. When you got the information, what did</p> <p>23 you get?</p> <p>24 A. We got information that led us to suspect</p> <p>25 Mr Levy had had a greater - had a significant</p> <p style="text-align: center;">Page 82</p>	<p>1 middle of the page. You see from 28.22, left</p> <p>2 hand side ...</p> <p>3 A. Sorry, sir, I can't see 28.22.</p> <p>4 Q. On the left hand side of the left hand</p> <p>5 column. 28.24, I beg your pardon.</p> <p>6 "Not only that, I am learning about the</p> <p>7 detail,"</p> <p>8 this is Mr McGrail,</p> <p>9 "That is why Mark is here. He is coming. If</p> <p>10 this were to collide, I am just going to give</p> <p>11 you a flavour of what it is. We had Sanchez</p> <p>12 being requested back from the UK as he was</p> <p>13 doing some Brexit talks there."</p> <p>14 Richardson:</p> <p>15 "Just before he was interviewed."</p> <p>16 McGrail:</p> <p>17 "He was asked to return and between him</p> <p>18 being asked to return and for him to land in</p> <p>19 Gibraltar he was wiping up his phone and we</p> <p>20 have evidence of that."</p> <p>21 Is that what it is referring to?</p> <p>22 A. Yes, sir.</p> <p>23 Q. The warrant is granted on 6th and then</p> <p>24 amended on 7th, is that right?</p> <p>25 A. I think so.</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 Q. Was Mr Rocca, the Director, aware that 2 your plan was to warrant and interview Mr 3 Levy? 4 A. Yes, that had been communicated to him 5 in the NDM assessment. 6 Q. Did you ask him not to tell anyone else? 7 A. I did. 8 Q. Could we have page B3610, please? This 9 is an email from you to Mr Rocca, copying 10 Mr Wyan on 1 April. I would like to ask you 11 about the fifth paragraph: 12 "The attached documents set out in great 13 detail much of the evidence that has not yet 14 been disclosed to the defence and I would 15 ask, please, that you restrict access to it to 16 yourself and," 17 is that Crown Counsel? 18 A. It is. 19 Q. "... Crown Counsel Mark Zamitt, who is 20 already been privy to previous discussions." 21 So you were asking the Director not to tell 22 anyone else. 23 A. That is correct. 24 Q. Do you know whether he did? 25 A. I don't.</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. The discretion on 12 May that you tried 2 to exercise in turning up at Hassans, why be 3 so discreet? You had a search warrant, why 4 not turn up in uniform and announce to 5 everyone in reception that you had come to 6 search Mr Levy's devices - rather, seize his 7 devices and search his office and home 8 office? 9 A. Because the damage that would be caused 10 to him would be tremendous. At that point 11 he was a suspect and we still had to listen to 12 his version of events. He may have given us 13 an account that exonerated him. 14 Q. The hope was that if you attended with a 15 warrant and spoke to him, he would 16 voluntarily hand over the devices and it 17 would not be necessary actually to execute 18 the warrant. 19 A. That is correct. 20 Q. Is that what he did on the day? 21 A. It is. 22 Q. Did you set an appointment for him to 23 come in for interview under caution? 24 A. I did. 25 Q. The next day, what happened to that</p> <p style="text-align: center;">Page 87</p>
<p>1 Q. Who else knew, apart from you, Mr 2 Wyan, Mr Zamitt and Mr Rocca? 3 A. Mr Clarke would have known as well. 4 Q. Mr Clarke. 5 A. And the Commissioner obviously. 6 Q. Yes. As far as you know, did Mr Llamas 7 or Mr Picardo know? 8 A. No. 9 Q. Only answer this if you can. Once they 10 found out, were they cross? 11 A. Mr Picardo and the - sorry, I ...? 12 Q. Yes, Mr Picardo and Mr Llamas. Only 13 answer if you can. When they found out 14 about your plan, were they cross? 15 A. I don't know about the Chief Minister. I 16 know that the Attorney General seemed upset 17 about us intervening with Mr Hassan with a 18 warrant. 19 Q. Could you tell whether they were cross 20 with Mr Rocca? 21 A. (Pause) No. 22 Q. Presumably you do not know what they 23 said to him or how he explained himself to 24 them. 25 A. No.</p> <p style="text-align: center;">Page 86</p>	<p>1 consent that he had given on 12th? 2 A. It was withdrawn, not on the next day, on 3 the same day. 4 Q. The consent to examination of the 5 devices. 6 A. Yes. 7 Q. In asking him to attend for interview, did 8 you give him notice of the topics which it 9 was proposed that he be asked about? 10 A. Yes, he was served with a comprehensive 11 pre-interview disclosure document. 12 Q. Could we have, please, B5392. 13 "The topic areas which we seek to explore in 14 formal interview under caution include but 15 are not limited to," 16 and there are eleven set out, the ninth of 17 which is communication with the Chief 18 Minister in relation to any of the above. So 19 communication by Mr Levy with Mr Picardo 20 in relation to any of the above. 21 A. Yes, that is correct. 22 Q. Was that notice of topics amended? 23 A. Yes, it was. 24 Q. At whose insistence? 25 A. The Attorney General.</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 Q. Amended in what respect?</p> <p>2 A. It was rephrased to take out the word</p> <p>3 Chief Minister.</p> <p>4 Q. Could we have page 3302, please. Chief</p> <p>5 Minister has gone from that version. Is that</p> <p>6 one of the things that was discussed in the</p> <p>7 first meeting that was recorded by Mr</p> <p>8 McGrail on 13 May 2020?</p> <p>9 A. It was certainly discussed in one of those</p> <p>10 meetings. I don't know, sir, whether it was</p> <p>11 the first.</p> <p>12 Q. Did you know that anyone in the room on</p> <p>13 13 May had already met or spoken to Mr</p> <p>14 Levy or Mr Baglietto?</p> <p>15 A. No.</p> <p>16 Q. Was the Attorney supporting the police</p> <p>17 plan, the plan to interview under caution, the</p> <p>18 plan to examine the devices?</p> <p>19 A. At the beginning, yes.</p> <p>20 Q. And at the end?</p> <p>21 A. No.</p> <p>22 Q. What could the police do without his and</p> <p>23 the Director's support?</p> <p>24 A. I'm not sure what I mean by that, Mr</p> <p>25 Gibbs. We were operationally independent</p> <p style="text-align: center;">Page 89</p>	<p>1 Mr McGrail - Mr McGrail - against Mr Levy,</p> <p>2 I beg your pardon.</p> <p>3 Q. Whom you were at that time hoping to</p> <p>4 interview under caution.</p> <p>5 A. That is correct.</p> <p>6 Q. The date having been set for the</p> <p>7 following Monday.</p> <p>8 A. That is correct.</p> <p>9 Q. In the second meeting of 15 May did you</p> <p>10 know who had been meeting or speaking</p> <p>11 with Mr Levy and Mr Baglietto behind the</p> <p>12 scenes?</p> <p>13 A. No.</p> <p>14 Q. The suggestion that somehow caution,</p> <p>15 interview under caution, be avoided, from</p> <p>16 whom did that come?</p> <p>17 A. The Attorney General.</p> <p>18 Q. Did you end up giving in to that?</p> <p>19 A. Yes.</p> <p>20 Q. Why?</p> <p>21 A. Because we had discussed that if we had</p> <p>22 requested - if we had forced the issue with</p> <p>23 Mr Levy, the view taken was that he would</p> <p>24 not give any evidence at all and it was better</p> <p>25 to invite him to give a statement not under</p> <p style="text-align: center;">Page 91</p>
<p>1 and so we could have taken whatever action</p> <p>2 that we considered was appropriate, but had</p> <p>3 we taken that action and gone to the stage</p> <p>4 where we would charge somebody, the DPP</p> <p>5 would still have to consider whether there</p> <p>6 was sufficient evidence to properly - I am</p> <p>7 trying to think of the phrase for this now - to</p> <p>8 see whether there were reasonable grounds to</p> <p>9 convict and whether it was in the public</p> <p>10 interest to proceed. So whilst we were free</p> <p>11 to do those things, in the absence of the other</p> <p>12 two devices we wouldn't have taken the case</p> <p>13 forward.</p> <p>14 Q. On 14th, the next day, Mr Baglietto</p> <p>15 writes and he is asking for disclosure of the</p> <p>16 information, the information which lay</p> <p>17 behind the warrants grant.</p> <p>18 A. That is correct.</p> <p>19 Q. Did you want that to be handed over?</p> <p>20 A. No.</p> <p>21 Q. Why not?</p> <p>22 A. Because the information that was laid for</p> <p>23 the granting of the warrants was an extremely</p> <p>24 comprehensive document which set out in</p> <p>25 great detail the evidence that we had against</p> <p style="text-align: center;">Page 90</p>	<p>1 caution than to receive no explanation at all.</p> <p>2 Q. Would you recommend listening to the</p> <p>3 recordings ...?</p> <p>4 A. Yes.</p> <p>5 Q. ... to get a measure of what was really</p> <p>6 going on in that room?</p> <p>7 A. Yes, I would.</p> <p>8 Q. Of the search items, which did the</p> <p>9 Attorney seem to be most concerned about?</p> <p>10 A. Mr Levy's telephone.</p> <p>11 Q. Why?</p> <p>12 A. Because - I don't know, it was not</p> <p>13 expressly discussed. I am guessing it was</p> <p>14 because of the legally privileged material that</p> <p>15 was on it, or may have been on it.</p> <p>16 Q. Outside the meetings with the law</p> <p>17 officers, you were getting correspondence</p> <p>18 from Hassans on behalf of Mr Levy. Did the</p> <p>19 two sources of criticism, the law officers in</p> <p>20 the meetings and Hassans outside the</p> <p>21 meetings, seem at the time to be separate?</p> <p>22 A. Sir, I am not sure I understand what that</p> <p>23 ...</p> <p>24 Q. Tell me: did you feel that criticism of the</p> <p>25 operational plan that you had made was</p> <p style="text-align: center;">Page 92</p>

<p>1 being delivered to you in the recorded 2 meetings? 3 A. Yes. 4 Q. Did you feel that criticism of the 5 operational plan was being delivered to you 6 in correspondence from Hassans, Mr Levy's 7 lawyers? 8 A. Yes. 9 Q. At the time did those two sources of 10 criticism appear to be separate? 11 A. Yes. 12 Q. Eventually were Mr Levy's lawyers 13 allowed to see the whole of the information? 14 A. The entire information, yes. 15 Q. Were you concerned about that? 16 A. Yes. 17 Q. Concerned that if that happened what 18 would next be said. 19 A. If that happened, and it did happen, it 20 meant that Mr Levy was in possession of all 21 the evidence that we had before we would 22 conduct an interview. 23 Q. The suggestion arises in the meeting: why 24 not ask him to make a statement instead? 25 A. That is correct.</p> <p style="text-align: center;">Page 93</p>	<p>1 A. We feared that was coming, yes, and it 2 was discussed. 3 Q. And is that exactly what happened? 4 A. It is. 5 Q. Where was his telephone all this time? 6 A. In a sealed exhibit bag in the 7 Commissioner's safe. 8 Q. Unexamined. 9 A. Unexamined. 10 Q. By the third meeting on 20 May we are 11 eight days on from the attendance at Hassans 12 with the warrant. Had you yet had a 13 statement from Mr Levy? 14 A. No. 15 Q. How long did you have before the 16 warrant expired? 17 A. Thirty days from the day that we went 18 there. No, sorry, thirty days from the date 19 that the warrant was issued. I think that was 20 a couple of days before we went. 21 Q. By the beginning of June had you got a 22 statement from Mr Levy? 23 A. No. 24 Q. Were you chasing? 25 A. Yes.</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. Were you concerned about that? 2 A. I was concerned in as much as it wasn't 3 the best way to obtain evidence. 4 Q. What was the down side potentially of it? 5 A. That we would go through that 6 procedure, that Mr Levy wouldn't give an 7 account and we would still have to go ahead 8 with an interview. Also, that the opportunity 9 to be able to give a statement not under the 10 situation - not under controlled interview 11 conditions is completely different. So if you 12 are sat at home, with access to records, with 13 access to legal advice, to take as much time 14 as you want to produce an account, it is not 15 going to be as spontaneous, as untainted, as if 16 somebody sits in an interview in a police 17 station. 18 Q. Once that course had been offered to Mr 19 Levy and accepted by those lawyers acting 20 on his behalf, what was next suggested by 21 them? 22 A. That he was no longer a suspect. 23 Q. Was that the case? 24 A. No, it wasn't. 25 Q. Had you seen that coming?</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. Was the statement finally provided on 9 2 June 2020? 3 A. Yes, it was. 4 Q. Was that the day that Mr McGrail 5 resigned? 6 A. I believe it was, or the day before, I'm not 7 a hundred per cent certain. 8 Q. By which time the warrant had ...? 9 A. Had already expired and been returned to 10 court. 11 Q. So where were you left now? 12 A. We were left in a very difficult position 13 because we had obtained Mr Levy's devices 14 by consent, which had been removed on the 15 same day that we had obtained them, so we 16 were retaining them on the strength of a 17 search warrant which we could have 18 enforced within thirty days, but that warrant 19 had now expired and therefore we would 20 have to start the procedure again in order to 21 get a court order in order to examine those 22 devices. 23 Q. Could we have B3447, please. Thank 24 you. Yes, here is what you were looking at 25 before:</p> <p style="text-align: center;">Page 96</p>

<p>1 "18. Levy's accounts not received until 9th. 2 Same day he also finally handed over his 3 documents, promised a month earlier. Same 4 day the Chief resigned. Nothing 5 incriminating in the documents. Partial 6 explanations his account but didn't answer all 7 of the issues. Revisited the need to interview 8 Levy under caution. Agreed with the DPP to 9 wait until we had reviewed the evidence from 10 the US," 11 letter of request, LOL? 12 A. That is correct. 13 Q. Yes. 14 "... we had been assured was imminent. 15 Once the material from the US arrived it was 16 reviewed urgently. Found to contain nothing 17 incriminating. Two of the other suspects in 18 the case now charged and the third released. 19 Based on the evidence that we have I agree 20 we no longer have reasonable grounds to 21 believe that the devices held within your safe 22 contain evidence that Levy has committed 23 the offence of conspiracy to defraud Blands. 24 For that reason I recommend that they are 25 returned without opening,"</p> <p style="text-align: center;">Page 97</p>	<p>1 A. We did. 2 Q. Had Mr Grech provided a statement in 3 that prosecution? 4 A. He had. 5 Q. To the effect that ...? 6 A. The Government was a complainant in 7 this matter. 8 Q. Did he persevere with that position? 9 A. No, his position changed. 10 Q. To what? 11 A. That the Government wasn't a 12 complainant in this matter. 13 Q. Without screening, may I give you the 14 references, sir? B3695 and C6245, that is the 15 first position and the second position. Then 16 just before the dismissal hearing in the 17 prosecution of the three defendants was a 18 discontinuance ordered? 19 A. Yes. 20 Q. Did you see that coming? 21 A. Yes. 22 Q. Why? 23 A. Because ... (pause) ... because we 24 seemed to have been frustrated on every 25 attempt to obtain the Government's consent</p> <p style="text-align: center;">Page 99</p>
<p>1 and is that what happened? 2 A. It is. 3 Q. The statement from Mr Levy, was he 4 asked whether he would agree to that being 5 used in the prosecution? 6 A. Yes, yes, he was. 7 Q. Did he agree? 8 A. He declined. 9 Q. Could we have B3449. If we go up the 10 page, Mr Bonfante writes on 9th - 6 11 November '20 to officers including yourself: 12 "I am grateful for your confirmation that the 13 RGP, following an extensive investigation, 14 have concluded Mr Levy is not a suspect in 15 the matter. In your call you said the next step 16 was for Mr Levy to decide whether he would 17 like to be a prosecution witness. Mr Levy 18 respectfully declines your invitation to be a 19 prosecution witness in the case. I understand 20 from our call this now brings Mr Levy's 21 involvement with the RGP to an end." 22 Was that the last of it? 23 A. Yes. 24 Q. You proceeded with the prosecution of 25 the other three suspects.</p> <p style="text-align: center;">Page 98</p>	<p>1 to prosecute, and when that complaint was 2 withdrawn and when we were asked to 3 provide evidence for the Counsel of 4 Ministers against Mr Sanchez and we did not 5 provide that, I thought the only way that this 6 is going to stop is for it not to go to court in 7 the first place. 8 Q. But it went to court, there was a 9 prosecution and charges were laid and they 10 were to be prosecuted and ... 11 A. And the proceedings were stopped. 12 Q. I am not going to ask you why that was. 13 A. I don't -- 14 Q. I am not going to ask you. Those are my 15 questions, sir. 16 Further Cross-examined by MR WAGNER 17 MR WAGNER: Sir, I have one very, very 18 short follow up question that I wanted to ask, 19 if possible. 20 THE CHAIRMAN: If you ask Mr Santos 21 about it. 22 MR SANTOS: What does this relate to? 23 MR WAGNER: It is a ten second exchange, 24 just about when Mr Richardson was at the 25 Hassans offices. Mr Richardson, you</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 referred to the events on 12 May.</p> <p>2 A. Mm-hm.</p> <p>3 Q. Where you arrived with a plan that if you</p> <p>4 could get voluntary assistance from Mr Levy</p> <p>5 you would not execute the search warrant. Is</p> <p>6 that right?</p> <p>7 A. That is correct.</p> <p>8 Q. You asked Mr Levy if he would</p> <p>9 voluntarily provide his phone, is that right?</p> <p>10 A. That is correct.</p> <p>11 Q. He agreed, did he not?</p> <p>12 A. He did.</p> <p>13 Q. Did he hand it over straightaway?</p> <p>14 A. No.</p> <p>15 Q. How long did it take him to hand it over?</p> <p>16 A. Oh, it took a considerable period of time</p> <p>17 because he consulted with Mr Chincotta</p> <p>18 privately and then with UK silk, and then</p> <p>19 agreed to hand it over but didn't actually sign</p> <p>20 the consent form until several hours later.</p> <p>21 Q. Can you do better than several, or is that</p> <p>22 what you --</p> <p>23 A. Sorry?</p> <p>24 Q. Can you do better than several as to - can</p> <p>25 you roughly estimate how long it took?</p> <p style="text-align: center;">Page 101</p>	<p>1 yourself. I just want to give you the</p> <p>2 opportunity to identify when you say that he</p> <p>3 expanded upon that comment and whether</p> <p>4 that is the exchange.</p> <p>5 A. Sorry, what was the question, Mr Santos?</p> <p>6 Q. Mr Gibbs KC ...</p> <p>7 A. Yes.</p> <p>8 Q. ... said to you - he put to you an earlier</p> <p>9 part of the meeting when Mr Levy said: "I</p> <p>10 know things," and you said: "I think," I</p> <p>11 cannot remember your exact words but you</p> <p>12 suggested that actually Mr Levy had</p> <p>13 addressed you on the things that he knew,</p> <p>14 later on in the same meeting.</p> <p>15 A. Uh-huh.</p> <p>16 Q. I do not know what you were referring to,</p> <p>17 but I am guessing that you may be referring</p> <p>18 to this exchange, but I want you to tell us</p> <p>19 whether that is in fact ...</p> <p>20 A. Somewhere in the transcript there is</p> <p>21 reference to interference from the British</p> <p>22 Government, I think, or that the Governor</p> <p>23 had been involved, and I think that's what Mr</p> <p>24 Levy may have been referring to.</p> <p>25 Q. Right. Maybe ... Then are you saying it</p> <p style="text-align: center;">Page 103</p>
<p>1 A. It was several hours before the consent</p> <p>2 was signed but it was far more hours than</p> <p>3 that until we took possession of the phone.</p> <p>4 THE CHAIRMAN: This is a very long ten</p> <p>5 seconds.</p> <p>6 MR WAGNER: Thank you.</p> <p>7 Further cross-examined by MR SANTOS</p> <p>8 MR SANTOS: A few short questions arising</p> <p>9 from some of the questions you have been</p> <p>10 asked. Earlier Mr Gibbs KC referred to a</p> <p>11 comment given by Mr Levy during the</p> <p>12 course of your conversation in Hassans board</p> <p>13 room: "I know certain things," and you said:</p> <p>14 "I think he expanded on that," words to that</p> <p>15 effect ...</p> <p>16 A. Yes.</p> <p>17 Q. "... later in the meeting." Can I take you</p> <p>18 to B3492, please. Starting from about</p> <p>19 halfway down that page, Mr Levy says:</p> <p>20 "There is going to be a lot coming out of here</p> <p>21 because I know a lot."</p> <p>22 A. Sorry, I can't find that reference.</p> <p>23 Q. Halfway down.</p> <p>24 A. Oh, yes, I can see it now, thank you.</p> <p>25 Q. I would ask you first of all to read that to</p> <p style="text-align: center;">Page 102</p>	<p>1 is not this exchange? A bit further down:</p> <p>2 "Que ce le digo or no ce le digo, shall I tell</p> <p>3 him or shall I not tell him?"</p> <p>4 A. That particular line he expanded on</p> <p>5 further, and that was to do with the fact that</p> <p>6 he had heard from, I forget how he describes</p> <p>7 it, an unimpeachable source that Mr Gaggero</p> <p>8 had heard about the exact date and time of</p> <p>9 the arrests of the Delhi defendants.</p> <p>10 Q. Can I ask you to go two lines further</p> <p>11 down:</p> <p>12 "No, no, se lo voy a decir,"</p> <p>13 No, no, I am not going to tell him, or maybe</p> <p>14 he is saying: No, no, I am going to tell him, I</p> <p>15 do not know.</p> <p>16 "This is between us. I know that Gaggero</p> <p>17 knew the exact time when they were going to</p> <p>18 be arrested and I don't know it from them, I</p> <p>19 know it from a very good independent</p> <p>20 source."</p> <p>21 Is that what you are referring to?</p> <p>22 A. Yes, that's what I'm referring to in the</p> <p>23 previous paragraph.</p> <p>24 Q. Yes, yes, but not necessarily what you</p> <p>25 were referring to when Mr Gibbs --</p> <p style="text-align: center;">Page 104</p>

<p>1 A. Yes. 2 Q. Okay. We will try and find that other 3 one. The private conversation in the car after 4 the meeting on 13 May ... 5 A. yes. 6 Q. ... that we have seen a transcript of 7 today, were you aware at that point that the 8 conversation that you were having with Mr 9 McGrail was being recorded? 10 A. No. 11 Q. Can I - sorry, we are just dotting about a 12 bit, but can I ask you to turn to B5737, 13 please. This is your note of a meeting with 14 the Commissioner of Police, the Attorney 15 General and Superintendent Richardson - 16 sorry, your meeting with the Commissioner 17 of Police and the Attorney General on 9 18 March at 12.10, the day after the collision at 19 sea. We had an exchange yesterday where 20 you said that you could not remember at 21 what point you learned that the AIS on the 22 vessel had been switched off. 23 A. That is correct. 24 Q. You pointed to this entry in your note, the 25 Commissioner of Police saying:</p> <p style="text-align: center;">Page 105</p>	<p>1 it was either faulty or it had been switched 2 off. 3 Q. I am just putting this to you because it 4 does look, but tell me if I am wrong, it does 5 look as though by 07.50 on the morning of 6 the incident you were in fact aware that AIS 7 had been switched off -- 8 A. No, it appeared to have been switched off 9 or faulty but there could have been an 10 intermittent fault, it could have worked and 11 then stopped working. 12 Q. Yes, either switched off or faulty. 13 A. Yes. 14 Q. Yes, correct, sorry. Can we now go to 15 C1764, please. This is a page you were taken 16 to yesterday in your daybook and it is a 17 meeting with Mr Wyan, John Field and PC -- 18 A. Paul Clarke? 19 Q. Paul Clarke, yes, thank you. Halfway 20 down there is a passage, I think it says 21 "charges" in the left-hand column. 22 A. Charges, "Over 50 now considered for 23 TC". 24 Q. Yes, can you just read on. 25 A. "Charges - over 50 now considered for</p> <p style="text-align: center;">Page 107</p>
<p>1 "Interrogate our own devices, AIS, homes, 2 GPS." 3 A. Yes. 4 Q. I just want to give you the opportunity to 5 look at your email, B1681. This is an email 6 we looked at yesterday with the log and it is 7 an email that - actually, let us just go back 8 one page to 8 March 2020. 9 A. Mm-hm. 10 Q. So that you can see this is the email that 11 you sent at -- 12 A. 10.11. 13 Q. ... 10.11 on the morning of the incident. 14 I just want to take you to the last line on that 15 page, which is an entry headed: 16 "Gold update at 07.50." 17 A. Mm-hm. 18 Q. That line says: 19 "Windy ports, have no coordinates, AIS 20 either switched off or faulty." 21 A. Yes. 22 Q. What would that be a reference to? 23 A. That we will have had some - an officer 24 will have told us that they have checked the 25 boat's system and that there was no record, so</p> <p style="text-align: center;">Page 106</p>	<p>1 TC. However, this would only be relying on 2 John Gallianos, non-independent evidence 3 and DPP (met last Friday with Mark Wyan 4 and Paul Clarke) seeks reassurance of 5 independent expert evidence." 6 A. Did you obtain independent expert 7 evidence at any point? 8 A. Yes. 9 Q. When did you obtain that? 10 A. We are -- well, we contracted -- 11 contracted isn't the right word -- we sought 12 the assistance of the NCA, the National 13 Crime Agency Cyber Unit in the UK and one 14 of their experts redid the work that 15 PriceCooperHouse(sic), 16 PricewatersCooperhouse had done and 17 verified that they could come to the same 18 conclusion. But they weren't able to give 19 that as evidence as experts and so we sought 20 external expert evidence in support of that. 21 Q. So, it wasn't from the NCA expert that 22 you got the independent -- 23 A. The intention had been to do that -- 24 Q. Yes, 25 A. -- and they supported that. They did the</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 exercise. They confirmed it but then said 2 that they -- I am not sure if they took legal 3 advice, but they wouldn't give expert 4 evidence on it. 5 Q. Thank you. Finally, there are two 6 questions which I put to you yesterday and 7 which I said that I would give you the 8 opportunity to answer in private. I think it is 9 probably worth us going into private either 10 immediately at some convenient stage in 11 order to address those questions. 12 THE CHAIRMAN: It is getting on for 13 12.30. If we were to go into private session 14 now and reassemble with Mr Wyan in public 15 session at, say 1.30, what about that? 16 MR SANTOS: I think that would be ... can I 17 just consult? 18 THE CHAIRMAN: Yes. 19 MR GIBBS: My Lord, if I volunteer, 20 although I am sure he is longing to be 21 finished, is that if you wanted to interpose Mr 22 Wyan and come back to the private session 23 whenever -- 24 THE DEPUTY JUDGE: You mean at the 25 end of the day, for example.</p> <p style="text-align: center;">Page 109</p>	<p>1 MR GIBBS: Thank you very much. 2 MR SANTOS: Can I call the next witness? 3 THE CHAIRMAN: Yes. 4 MR SANTOS: Superintendent Mark Wyan. 5 THE CHAIRMAN: Yes. 6 MARK WYAN Sworn: 7 Examined by MR SANTOS: 8 Q. Superintendent Wyan, good afternoon? 9 A. After noon. 10 Q. Can I, first of all, ask you to look at the 11 bundle in front of you that is marked 12 "witness statements," and behind the first tab 13 should hopefully be your first witness 14 statement. Can I ask you to check that it is 15 in fact your first witness statement and that 16 your signature is at the end of that statement? 17 A. Yes, I can confirm it is. 18 Q. Is that statement true to the best of your 19 knowledge, information and belief? 20 A. It is. 21 Q. Thank you. Can you now turn to the next 22 statement behind the next tab and can you 23 again confirm that it is your second witness 24 statement and your signature on the final 25 page?</p> <p style="text-align: center;">Page 111</p>
<p>1 MR GIBBS: For example. 2 MR SANTOS: I am just told there is an 3 issue in terms of transcribing the private 4 session that has not been resolved. So 5 perhaps that may be a preferable course. 6 THE CHAIRMAN: All right. Then perhaps 7 the better course is to have a lunch break now 8 and start with Mr Wyan at 1 o'clock. 9 MR SANTOS: 1 o'clock, shall we do that. 10 THE CHAIRMAN: Let's do that. 11 (12.25) 12 (The short adjournment) 13 (13.00) 14 THE CHAIRMAN: Mr Gibbs, Mr 15 Richardson is concerned that we may not 16 finish today. Well, I can give him an 17 absolutely cast-iron guarantee that we will 18 finish his evidence today. 19 MR GIBBS: Thank you very much. 20 THE CHAIRMAN: And you also suggested 21 that it would be a good idea to listen to the 22 recordings of those three meetings. 23 MR GIBBS: Yes. 24 THE CHAIRMAN: I have made 25 arrangements to do that.</p> <p style="text-align: center;">Page 110</p>	<p>1 A. Yes, it is. 2 Q. Do you confirm that that is true to the 3 best of your knowledge, information and 4 belief? 5 A. I do. 6 Q. I think there is one further statement 7 behind the third tab. Can you please confirm 8 that that is your third witness statement and 9 your signature on the final page? 10 A. Yes, it is. 11 Q. Do you confirm that that is true to the 12 best of your knowledge, information and 13 belief? 14 A. I do. 15 Q. Thank you. Can I ask you, please, to 16 state your current rank? 17 A. I am currently a superintendent of the 18 RGP. 19 Q. What are you responsible for as 20 superintendent? 21 A. I am currently responsible for the 22 professionalism division of the RGP. 23 Q. I think it is right to say that you became 24 the officer in charge of Operation Delhi on 25 19 May 2019. Is that correct?</p> <p style="text-align: center;">Page 112</p>

1 **A. That's correct, yes.**
 2 Q. What does that role as officer in charge
 3 entail?
 4 **A. Essentially you are responsible for the**
 5 **day to day investigation for collating**
 6 **evidence, witness statements, following lines**
 7 **of enquiry and essentially if it leads to a**
 8 **prosecution, for compiling a docket of**
 9 **evidence including charges to present to the**
 10 **OCPL.**
 11 Q. At the time who was the senior
 12 investigating officer?
 13 **A. It was Superintendent Paul Richardson.**
 14 Q. What was your relationship with
 15 Superintendent Richardson like at the time?
 16 **A. It was a professional relationship**
 17 **although a good relationship. I had known**
 18 **Mr Richardson for a number of years and**
 19 **worked with him in a number of different**
 20 **departments.**
 21 Q. What was your relationship like with Mr
 22 McGrail, the Commissioner of Police at the
 23 time?
 24 **A. I would describe it again as a professional**
 25 **relationship, although to the best of my**

Page 113

1 Q. At all or not --- or was he not very
 2 involved?
 3 **A. To my knowledge he was not involved in**
 4 **any decision making although I can't account**
 5 **obviously for whether Mr Richardson spoke**
 6 **to him and that led to a decision on his part.**
 7 Q. As far as you know, did Mr McGrail ever
 8 brief the Attorney General about Operation
 9 Delhi?
 10 **A. The only knowledge I have of speaking**
 11 **to the Attorney General or about Operation**
 12 **Delhi was the meetings of 15 and 20 May.**
 13 **Other than that I have no knowledge about it.**
 14 Q. In the period of May 2019 to March
 15 2020, before the meetings in April and May
 16 2020, do you know whether the Attorney
 17 General was ever informed as to the evidence
 18 in the case , in the investigation?
 19 **A. Not to my recollection, no.**
 20 Q. Turning to the so-called ownership issue
 21 in Operation Delhi, why was the ownership
 22 of the NCIS platform relevant to the criminal
 23 investigation?
 24 **A. So the ownership was relevant with**
 25 **regard to two aspects of the investigation.**

Page 115

1 **recollection I have never worked under him**
 2 **in terms of line management and certainly**
 3 **have never worked closely with him.**
 4 Q. You say that --- we have mentioned the
 5 fact that Superintendent Richardson was the
 6 senior investigating officer, so primarily your
 7 reporting on the investigation would have
 8 been to him presumably?
 9 **A. That's correct.**
 10 Q. How much reporting did you do to Mr
 11 McGrail?
 12 **A. My recollection --- and there was a note**
 13 **although I can't remember the date of a single**
 14 **meeting where we went through I believe it**
 15 **was an iteration of the charging advice**
 16 **reports which was held in his office with a**
 17 **number of other individuals where we gave**
 18 **an update on the progress of the**
 19 **investigation.**
 20 Q. How involved, as far as you are aware,
 21 was the Commissioner of Police in making
 22 decisions about Operation Delhi?
 23 **A. To the best of my knowledge, he was not**
 24 **involved in the decision making of Operation**
 25 **Delhi.**

Page 114

1 **The first was regarding the conspiracy to**
 2 **defraud charge which initially was based on**
 3 **the premise that Blands was the owner of the**
 4 **NCIS platform. We may come later to it but**
 5 **there was a decision which was made that**
 6 **later on once it became a possibility that that**
 7 **ownership was in dispute. The decision was**
 8 **made --- and I am sure you will take me to**
 9 **that, but once that decision was made,**
 10 **beyond that point, the only other relevance**
 11 **that ownership had was regarding the**
 12 **computer misuse offences and it was relevant**
 13 **to the effect that in order to compute --- in**
 14 **order to commit a computer misuse offence,**
 15 **it must be without authority and that the**
 16 **authority, therefore, comes from the owner of**
 17 **the platform and we needed to establish who**
 18 **the owner was and then assess whether or not**
 19 **they had given authority to access or make**
 20 **alterations to the platform.**
 21 Q. So by the time of May 2020 for each of
 22 the two offences that you have referred to,
 23 we have conspiracy to defraud and computer
 24 misuse, how important would you say the
 25 ownership issue was to each of those

Page 116

<p>1 offences or types of offence?</p> <p>2 A. The conspiracy to defraud charge, I</p> <p>3 proposed a way of allowing us to consider</p> <p>4 whether a prosecution could continue in light</p> <p>5 of a disputed ownership and that was on the</p> <p>6 basis of --- rather than removing the NCIS</p> <p>7 platform from Bland, that it was in order to</p> <p>8 remove a maintenance contract from Bland</p> <p>9 so the ownership platform in that regard ---</p> <p>10 and it was accepted by the DPP</p> <p>11 subsequently, it was no longer an essential</p> <p>12 ingredient of that offence. That, therefore,</p> <p>13 only left authority with regard to the</p> <p>14 computer misuse offences and the authority</p> <p>15 was only in dispute --- and I don't remember</p> <p>16 when we --- the specific date that we were</p> <p>17 certain about this is the route that we were</p> <p>18 going to take but certainly in and around that</p> <p>19 time it was agreed that there was a particular</p> <p>20 period where the Chief Minister, I think it</p> <p>21 was 4 October, had given instructions that no</p> <p>22 longer --- the 36 North and Mr Cornelio no</p> <p>23 longer could access the platform so,</p> <p>24 therefore, authorisation beyond that point</p> <p>25 was not in dispute and likewise during the</p> <p style="text-align: center;">Page 117</p>	<p>1 sentences which would suggest that it was a</p> <p>2 defence and where we might need to go to</p> <p>3 ask for additional lines of enquiry and that</p> <p>4 for each of those we asked questions of</p> <p>5 certain individuals to make sure that we</p> <p>6 followed those lines of enquiry. I believe</p> <p>7 that it was for all defence submissions,</p> <p>8 although I cannot be absolutely certain</p> <p>9 without going to my notes and double</p> <p>10 checking.</p> <p>11 Q. This number 84 is your note, your log of</p> <p>12 the investigation, so if there is an entry that</p> <p>13 says, "review of defence submissions," that</p> <p>14 would suggest that you reviewed the</p> <p>15 submissions that were received?</p> <p>16 A. Yes.</p> <p>17 Q. Around that time?</p> <p>18 A. Yes, it certainly does, although it is</p> <p>19 difficult to know the extent but it would</p> <p>20 make sense, yes.</p> <p>21 Q. I am only going to ask you generally; the</p> <p>22 general allegation by Mr Cornelio and Mr</p> <p>23 Perez was that the NCIS, its underlying</p> <p>24 modules and all the related intellectual</p> <p>25 property was sold outright by Bland to the</p> <p style="text-align: center;">Page 119</p>
<p>1 periods when they were working for Bland,</p> <p>2 the argument was that they were</p> <p>3 contractually bound to Bland and, therefore,</p> <p>4 could not have been authorised to make</p> <p>5 alterations that would have been against</p> <p>6 Bland itself. So there was what was</p> <p>7 described as --- and I think the DPP</p> <p>8 described it in these terms, a grey area in</p> <p>9 between that where authority was perhaps</p> <p>10 less certain, so it was in those particular</p> <p>11 periods of time that caused potential</p> <p>12 problems for any prosecution.</p> <p>13 Q. Can we now turn to B3075, please, and if</p> <p>14 we look at the entry of 27 July 2019, there is</p> <p>15 a reference to defence submissions made by</p> <p>16 Cornelio and Perez, do you see that entry 84?</p> <p>17 A. I do, yes.</p> <p>18 Q. Did you review those submissions?</p> <p>19 A. I believe that we did review the</p> <p>20 submissions, although I can't explicitly say. I</p> <p>21 believe we reviewed all submissions and the</p> <p>22 reason I say that is because there were</p> <p>23 certainly stages that we obtained defence</p> <p>24 submissions and we went to the extent of</p> <p>25 creating tables breaking them down into</p> <p style="text-align: center;">Page 118</p>	<p>1 government. Do you recall that being an</p> <p>2 allegation made by Cornelio and Perez?</p> <p>3 A. I do.</p> <p>4 Q. Did you consider at the time what the</p> <p>5 implications of that submission were if it</p> <p>6 were true?</p> <p>7 A. We did consider the implications if that</p> <p>8 were true. I do not know whether that was</p> <p>9 immediately at that point in time or a month</p> <p>10 or a couple of months later. Certainly we</p> <p>11 had contact with the financial secretary and I</p> <p>12 believe it was in September, October of the</p> <p>13 same year, we had certainly approached the</p> <p>14 financial secretary to ask for his views on</p> <p>15 ownership and the response from the</p> <p>16 financial secretary at that point was that it</p> <p>17 wasn't appropriate to make an assertion of</p> <p>18 ownership on behalf of the government. We</p> <p>19 may, and we certainly did --- and I am not</p> <p>20 sure whether it was at that period or</p> <p>21 afterwards, we did make enquiries with</p> <p>22 Bland together with other people about</p> <p>23 whether they could support their assertions as</p> <p>24 to ownership and they provided</p> <p>25 documentation to us. So there were a</p> <p style="text-align: center;">Page 120</p>

30 (Pages 117 to 120)

1 **number of enquiries that we followed in**
 2 **relation to that.**
 3 Q. At C2623, there is a letter from Mr
 4 Sanchez's lawyers to you on 5 September
 5 2019 --- actually I can show you --- perhaps I
 6 can show you the preceding page, 2622
 7 which is a letter from Phillips and on that
 8 second page of the letter, a similar statement
 9 is made, "The NCIS platform, its underlying
 10 modules and relevant hardware were sold by
 11 Blands to HMGOG." Is it correct to say that
 12 that stance was also taken by the
 13 government?
 14 **A. I am sorry, can you remind me of the ---**
 15 Q. Sorry, at the time it was 5 September
 16 2019.
 17 **A. So the government's position was --- at**
 18 **that time the position of the financial**
 19 **secretary was that he didn't feel it appropriate**
 20 **to make an assertion about ownership on**
 21 **behalf of the government and I believe that**
 22 **was either the same month or, at the latest,**
 23 **the month after that.**
 24 Q. In November 2019 you have already
 25 alluded to this or maybe more than alluded to

Page 121

1 it, you came up with a proposal on how to
 2 avoid the so-called ownership issue or the
 3 ownership dispute which we will come to in
 4 a moment but up until that point, would you
 5 describe the government's position in relation
 6 to that issue to be cooperative?
 7 **A. Cooperative?**
 8 Q. In terms of with the investigation as far as
 9 the ownership dispute was concerned?
 10 **A. They responded to the request. As I said,**
 11 **the financial secretary I believe responded.**
 12 **That was the only --- at that stage I believe**
 13 **that was the only response that we had had**
 14 **from the government, albeit it wasn't too long**
 15 **after - and I may have to check - we had**
 16 **made that enquiry with them but certainly in**
 17 **terms of they did offer a response, albeit the**
 18 **response was, "We don't think it's appropriate**
 19 **to make assertions on ownership."**
 20 Q. Did you consider --- before you came up
 21 with the alternative position did you consider
 22 that the ownership issue needed to be
 23 resolved before Operation Delhi could
 24 continue?
 25 **A. I think the reason why I considered our**

Page 122

1 **options at that point --- because I could see**
 2 **that there may be potential issues with**
 3 **disputed ownership and what I was doing**
 4 **was looking at options and saying to myself,**
 5 **"Is this going to be fatal to a prosecution,"**
 6 **because if it was fatal to a prosecution, then**
 7 **clearly it needed to be resolved and if it was**
 8 **not resolved, then the prosecution or any**
 9 **investigation would have to be stopped at**
 10 **that point. So I was effectively that if the**
 11 **facts changed and disputed ownership --- and**
 12 **there was disputed ownership, could a**
 13 **prosecution still survive that and continue.**
 14 Q. And what was your view at the time?
 15 Could a prosecution continue?
 16 **A. My view was that if we focused on a**
 17 **maintenance contract, that would avoid the**
 18 **ownership issue and it could continue and it**
 19 **was a view that was subsequently supported**
 20 **by the DPP.**
 21 Q. I am sorry, just before --- just in terms of
 22 without the contract option, if I can call it
 23 that, the maintenance contract option, was
 24 your view that Operation Delhi could not
 25 continue?

Page 123

1 **A. No, because we had --- all or the**
 2 **evidence that we had at that point was from**
 3 **Bland. Everything that had been provided ---**
 4 **and there appeared to be substantial**
 5 **arguments and there were legal arguments**
 6 **that were fairly detailed about why the**
 7 **ownership belonged to Bland. Admittedly, at**
 8 **that stage the government hadn't provided**
 9 **anything, so it was certainly everything that**
 10 **had come from the Bland side of things but**
 11 **when we did make that enquiry, obviously**
 12 **the government said that they weren't**
 13 **prepared to make it, so at that time,**
 14 **everything pointed to Bland being the**
 15 **ownership and all I was doing was saying,**
 16 **"Look, if it does become disputed, does that**
 17 **mean that that's the end of the investigation."**
 18 Q. Can we now go to B3100, please, and the
 19 entry at 210 is dated 15 November 2019.
 20 There is reference to PWC considerations.
 21 We can skip over those and then there is the
 22 second paragraph that says, "I propose that
 23 we may wish to consider that there was a
 24 conspiracy to deprive Bland of the
 25 maintenance contract rather than the NCIS

Page 124

1 platform. This is on the basis that the
 2 contract is subject to less dispute as to
 3 ownership and may, therefore, pose less of an
 4 issue in presenting to the jury." Just for the
 5 benefit of non-lawyers, can you just explain
 6 the reasoning of this proposal?
 7 **A. In terms of the NCIS platform, the**
 8 **conspiracy to defraud charge required that**
 9 **there was effect to somebody's proprietary**
 10 **rights or interests, so it needed to be**
 11 **somebody's property that was dishonestly or**
 12 **unlawfully --- I think the term is "a dishonest**
 13 **agreement with elements of unlawfulness," to**
 14 **--- and it was with intent to --- I am sorry, I**
 15 **may be sounding too intellectual, but to**
 16 **obtain a right or interest in property, so we**
 17 **needed to understand who owns that**
 18 **property. If Bland were the owner of that**
 19 **property, clearly there is no issue because**
 20 **they are making the complaints and,**
 21 **therefore, they are entitled to say that their**
 22 **proprietary right or interest is affected. If it**
 23 **becomes disputed, it is very difficult,**
 24 **especially if there is no complaint from the**
 25 **government, to suggest that somebody's**

Page 125

1 **proprietary right or interest has been affected**
 2 **because the government aren't saying that**
 3 **they disagree with what was happening. So I**
 4 **think the proposal that I put forward was that**
 5 **I felt that there was a contractual**
 6 **arrangement between Bland and the**
 7 **government at that point and that that was**
 8 **their proprietary right or interest. It would,**
 9 **sounding technical, be what we call a chose**
 10 **in action but we felt that there was a contract**
 11 **of some level, whether an implied contract or**
 12 **otherwise, and that that was the interest that**
 13 **would have been affected. The investigation**
 14 **sought --- sorry, I will stop at that point.**
 15 **Q. Thank you, that is a very full answer, so**
 16 **thank you. On what basis did you believe**
 17 **that there was or might be a contract of**
 18 **sufficient duration and permanence that**
 19 **Bland could be deprived of it?**
 20 **A. I am not sure the question about duration**
 21 **necessarily came into it. I think we certainly**
 22 **considered that there was a contractual**
 23 **relationship. Whether or not that contractual**
 24 **relationship was just on a month to month**
 25 **rolling basis or whether it was something**

Page 126

1 **over a longer period of time, by virtue of**
 2 **either discussions or something else, there**
 3 **was a maintenance contract although**
 4 **unsigned which Bland relied on to suggest**
 5 **that there had been some element of**
 6 **discussion about maintenance although I**
 7 **understand that the government disputed that.**
 8 **I am not sure that duration necessarily came**
 9 **into it. It was just that we felt on analysis**
 10 **and particularly with the benefit or the legal**
 11 **advice that Bland had given, and they gave a**
 12 **number of stated cases and legal arguments**
 13 **as to why there may have been a contract in**
 14 **place, we felt that that was sufficient to**
 15 **suggest there was a contract and if I can put**
 16 **it simply, and going to an analogy --- and**
 17 **please stop me if I am saying too much ---**
 18 **Q. No, no, no.**
 19 **A. Mr Cooper described it as an individual**
 20 **going and sitting down in a barber's shop and**
 21 **there was a contractual relationship to the**
 22 **extent that they went and sat down and they**
 23 **had to pay for that contract for services. In**
 24 **our view, in our view, the HM government**
 25 **were going down and sitting in Bland's for**

Page 127

1 **their haircut month in, month out, and that 36**
 2 **North were trying to attract them away to**
 3 **another business but by doing it through**
 4 **unlawful and dishonest means, so it is the**
 5 **means by which they were trying to**
 6 **appropriate that right or interest.**
 7 **Q. Just to clarify, it is implied in your**
 8 **answer but no document signed contract**
 9 **entitled Maintenance Agreement or no signed**
 10 **contract to that effect was ever located. Is**
 11 **that correct?**
 12 **A. No, there was a maintenance contract**
 13 **provided by Bland but it was unsigned.**
 14 **Q. Was it necessary at any point to pause all**
 15 **actions on Operation Delhi before that**
 16 **ownership issue could be resolved?**
 17 **A. No, for the reason that I have articulated,**
 18 **I think. I think viewing it from the**
 19 **perspective of a maintenance contract meant**
 20 **that the dispute wouldn't need to be resolved**
 21 **and we could consider the conspiracy charge.**
 22 **This, if I may, is not unusual in policing. We**
 23 **will often review the facts as they change and**
 24 **assess whether or not a charge either needs to**
 25 **change entirely to a different charge or the**

Page 128

<p>1 key elements of the charge need to be 2 reconsidered. It's not unusual practice in 3 policing. 4 Q. Is it your position, therefore, that the 5 issue of ownership ceased to be a key 6 consideration when it came to charging the 7 former Operation Delhi defendants? 8 A. It was an issue to the extent that it had an 9 issue on the computer misuse offences but 10 not the conspiracy to defraud offence. 11 Q. Can we now turn to B3195, please, this is 12 a record of a meeting on 4 September 2019 13 where you met with Chief Inspector 14 Finlayson and the DPP to discuss legal 15 matters including Asker statement, Webber 16 status, security related information, official 17 Secrets Act, conspiracy to defraud and an 18 itinerary was created for that meeting. There 19 is a more detailed note in the investigation 20 log and we can look at B3086 for that. At 21 the bottom of that page it says, 22 "Consideration of legal issues and advice we 23 sought from the DPP; in particular ..." and if 24 we go over the page, the final entry says, 25 "Conspiracy to defraud, does the agreement</p> <p style="text-align: center;">Page 129</p>	<p>1 the 36 N business. Consideration of whether 2 this is legally privileged or simply business 3 actions. Note that he is working for Levy 4 Hassan and is arguably not a lawyer/client 5 relationship. If it is, how do we proceed 6 moving forward." 7 A. I don't have a recollection of the meeting 8 beyond those notes that you have but there is 9 certainly no indication that there was a 10 discussion about Mr Levy. 11 (13.31) 12 Q. In January 2020, it seems that you were 13 working hard to formulate the charges. If we 14 go to B3716 - I will give you the chance to 15 agree or disagree with that statement, but I 16 will just take you to 3716 first. This is an 17 entry in your log, and it is dated 30 January 18 2020. "Review of JOG statements. Charge 19 identification. 51 offences identified, to be 20 selected based on the advice of DPP." So, is 21 it fair to say that you were working hard to 22 formulate the charges at the time? 23 A. I'm not - I wouldn't say "formulate the 24 charges" at that stage, in terms of, usually 25 when we say "formulate" it would be the</p> <p style="text-align: center;">Page 131</p>
<p>1 to take the NCIS contract from Bland amount 2 to conspiracy to defraud? Consideration to 3 the term by dishonesty or is it simply a 4 commercial dispute and civil action is 5 appropriate. Relevant legal advice sought in 6 respect of the ongoing investigation." Did -- 7 - it seems as though you had a detailed 8 discussion with the DPP about these issues, 9 did it come up during those discussions 10 whether the offence of conspiracy to defraud 11 at common law was an offence under the law 12 of Gibraltar at that time? 13 A. It did not, no. 14 Q. This discussion that took place with the 15 DPP, during that discussion was there any 16 consideration of Mr Levy's involvement in a 17 potential conspiracy to defraud on 4 18 September 2019? 19 A. Could you scroll up so I can see the 20 reference to Levy Hassan? Was that to do 21 with Mr Webber? 22 Q. Yes, this is Webber and it says, 23 "Keyword search has recovered 24 correspondence with David Webber who 25 appears to have been involved in setting up</p> <p style="text-align: center;">Page 130</p>	<p>1 precision in terms of wording of the charges. 2 I think if you look at the preceding days, if 3 I'm not mistaken, I'd spent two or three days 4 going through the statements of Jonathan 5 Galliano, who was the Bland - well, in terms 6 of technical and understanding of what was 7 happening in - in the computers, he'd 8 provided a lot of information. And, what I'd 9 done of the - the course of those days is try 10 and identify, based on his witness statements, 11 whether there were any potential offences, 12 which is why I arrived at the 51 offences. 13 And, the reference beyond that is effectively 14 me saying: 51 offences is a lot, we're going 15 to need to reduce these down if we were 16 going to charge them of course. 17 Q. So why were there so many, 51 offences? 18 Why did you identify so many? 19 A. Because my job is not to select the 20 appropriate charges; my job is to identify 21 potential offences. Each unauthorised 22 access, or unauthorised access with intent to 23 impair, or - or unauthorised access which 24 could have a impact on the national security, 25 being the three main types of charges that we</p> <p style="text-align: center;">Page 132</p>

<p>1 looked at for computer offence. My job was 2 to identify each incident in the evidence that 3 I had available to me. It wasn't my job to 4 make a decision about what the appropriate 5 charges were to put before a jury. 6 Q. It is fair to say that by the time of the 7 charging report (which we will come to later 8 - charging advice or charging report) the 9 number of charges actually increased to 76. 10 Is that correct? 11 A. That's correct, yes. 12 Q. Your note, as you point out, says, "to be 13 selected based on the advice of the DPP". Is 14 it typical to obtain advice from the DPP on 15 charges, given that the RGP has 16 responsibility for charging in Gibraltar? 17 A. Yes, it is typical. It is certainly more 18 typical with more serious offences, but we 19 also have a in-house Crown Counsel, who 20 will often assist officers in deciding 21 appropriate charges for even less complex 22 cases. And that is very routine, that officers 23 will go and seek advice, and decide on what 24 charges may be appropriate in the 25 circumstances.</p> <p style="text-align: center;">Page 133</p>	<p>1 and the OCPL. 2 Q. And then if we go to the next page, 3 please. This is 6 April 2020, and you say, 4 "Awaiting instructions from DPP as to 5 whether to charge and with what offences." 6 Does the RGP tend to take instructions from 7 DPP on charging? 8 A. Yes, to the extent - particularly in a 9 serious case like this, we would - we would 10 look for legal support, because it was a 11 complex case. There were - particularly with 12 the conspiracy to defraud. In fact on the 13 computer misuse as well, there were a lot of 14 very complex elements. There were some 15 very complex legal issues that needed to be 16 overcome. I had taken a view on some of 17 them, but certainly I am not a practice 18 lawyer, so it was always the intent to make 19 sure that we had that legal backing. 20 Q. But is the word "instructions" the correct 21 word for that relationship with the DPP? It is 22 not advice that you are referring to, it is 23 "instructions". Is that an accurate record of 24 what took place there? 25 A. I'd agree that advice would probably be</p> <p style="text-align: center;">Page 135</p>
<p>1 Q. Can we go over the page to 3717. This is 2 a record of a meeting on 21 January between 3 you and Superintendent Richardson, Chief 4 Inspector Field and Detective Sergeant 5 Clarke. Your note there refers to "over 50 6 possible charges identified, predominantly 7 computer misuse, to be refined down." Can I 8 ask, when did you intend to refine the 9 charges down? 10 A. When I say "refined down", it was always 11 my intention that that would be a decision for 12 the - the DPP or the prosecutor. 13 Q. Well, when was it intended that the DPP 14 or the prosecutor might refine the charges 15 down? 16 A. Usually on presentation of - of the 17 evidence, so that they could have sight of - of 18 the number of instances and make a decision 19 on - on the appropriateness of charges. The - 20 you'll see when we go to another document 21 that I refer to the code of - of prosecutors, 22 and there's certain obligations on prosecutors 23 to look at ensuring that prosecutions are 24 clear, that they do not overload charges. So, 25 those obligations are really for the - the DPP</p> <p style="text-align: center;">Page 134</p>	<p>1 more appropriate. 2 Q. During the investigation, were you or any 3 of the other investigating officers to your 4 knowledge being directed by James 5 Gaggero? 6 A. No. 7 Q. Were you being influenced by James 8 Gaggero? 9 A. No. 10 Q. To your knowledge, was Mr McGrail 11 being directed or influenced by Mr Gaggero? 12 A. To my knowledge, no. 13 Q. Can we now please turn to the document 14 at B3452, please. This is a document that 15 was drafted by Superintendent Richardson, 16 and it is described as an NDM assessment. 17 That is shorthand for National Decision 18 Model assessment, I believe? 19 A. Yes, National Decision Model, yeah. 20 Q. And was it usual at the time to use a 21 National Decision Model? 22 A. The National Decision Model is well 23 established for police officers, certainly in 24 the UK. It's a recommended way of officers 25 setting out a structured approach to rationale</p> <p style="text-align: center;">Page 136</p>

34 (Pages 133 to 136)

1 when decision making is done. To this - to
 2 date, and I'm not sure it was at that time, it's
 3 actually policy of the RGP. I believe it
 4 certainly would have been policy in - in the
 5 UK to adopt an NDM approach to decision
 6 making, and it is well established within
 7 public order, firearms, and lots of different
 8 training elements that are - are done by
 9 police officers. So, it is an established
 10 model.
 11 Q. What about in the RGP?
 12 A. It was something that was well known, or
 13 certainly known. The extent to which it was
 14 used, I couldn't say.
 15 Q. Had you seen one before, an NDM
 16 assessment?
 17 A. I'd used one before, yes.
 18 Q. You had used one yourself?
 19 A. Yes, I had.
 20 Q. Can we just look at your... Well, I do not
 21 think I have to take you there. You say in
 22 paragraph three of your third statement that
 23 the NDM shows that by this date the RGP
 24 was treating Mr Levy as a suspect. Can I ask
 25 you, and feel free to refer to the NDM itself,

Page 137

1 what was your basis for treating Mr Levy as
 2 a suspect?
 3 A. So, the - the NDM assessment arose from
 4 a list of texts, together with questions, that I
 5 had sent to Mr Richardson, I think it was in
 6 February 2020 and I think it's in one of my
 7 exhibits.
 8 Q. Is it at B3458?
 9 A. That is the list of que-- that is the list of
 10 texts, albeit was a different format and the
 11 format I had had some questions on the right-
 12 hand side. But yes, that - those are
 13 essentially the texts.
 14 Q. Sorry, I interrupted you. You were
 15 explaining the investigative team's reasoning
 16 for treating Mr Levy as a suspect.
 17 A. Yes, so we - we'd looked at the texts in
 18 the context of the investigation at that time,
 19 and we gave some thought to whether or not
 20 the information that we had gave rise to a
 21 conspiracy to defraud. And, you will see that
 22 - I would have to read to remind myself of
 23 everything, I'll take you to some points
 24 although I may miss some others. I recall in
 25 particular the "conspiracy to defraud"

Page 138

1 considerations, I think if my memory serves I
 2 wrote this section and sent it to Mr
 3 Richardson. He'd already written most of it
 4 but he'd asked for some input, and I think I
 5 wrote this part out, and - and essentially went
 6 through the offence of conspiracy to defraud
 7 as we understood it at that time.
 8 Q. Sorry, just to be clear: are you referring to
 9 the section that starts on B3454?
 10 A. That - that's correct.
 11 Q. Titled, "Conspiracy to defraud
 12 considerations".
 13 A. That's right.
 14 Q. Up to, on the following page,
 15 "Conclusion".
 16 A. That's correct.
 17 Q. Sorry, carry on.
 18 A. And, I am conscious that there are - there
 19 were - I'm sure there's some key points
 20 preceding the - but I'll just go to the - to the
 21 conspiracy to defraud in a minute. So, broke
 22 it down (the offence as we understood it to
 23 be), and felt that the evidence suggested that
 24 the offence had been committed, the offence
 25 essentially being that it was a dishonest

Page 139

1 agreement with elements of unlawfulness, to
 2 - and I forget, with elements of unlawfulness
 3 to obtain a proprietary right or interest.
 4 Words to that effect, I think it was.
 5 Q. I mean, I am not trying to test your
 6 memory or recollection, or your legal
 7 knowledge. But, maybe we can deal with it
 8 in a different way: was this your basis --
 9 A. Yes, absolutely.
 10 Q. -- for treating Mr Levy as a suspect?
 11 A. Yes, it was, yes.
 12 Q. Can I just take you now to the end of that
 13 document, the penultimate page. This deals
 14 with the necessity to arrest Mr Levy at 30,
 15 then at 31 the seizure of digital devices; at
 16 33, examination of content; 34, the warrant
 17 being restricted to mobile devices; then at 35,
 18 "Given the political sensitivities and potential
 19 reluctance for JP issue a warrant for Hassan
 20 law practice, the warrant should be requested
 21 from the Chief Justice." Was that your
 22 recommendation or suggestion, or was it
 23 Superintendent Richardson's?
 24 A. I don't recall whose recommendation it
 25 was. I believe that Superintendent

Page 140

1 **Richardson wrote that section, but there may**
 2 **have been discussion leading up to it.**
 3 Q. And then over the page, there is a
 4 statement at 37, "Given the political
 5 sensitivities of the persons involved, the least
 6 disruptive and most diplomatic means of
 7 police investigation will be deployed." And
 8 then, at 39 there is a reference to body-worn
 9 cameras. So, it was agreed that you would
 10 wear body-worn cameras at the time of
 11 carrying out the search warrant, or the
 12 proposed search warrant, at Hassans.
 13 **A. Yeah, I mean I - the wording isn't clear,**
 14 **but I think the intent was that we would take**
 15 **what we call body-worn cameras, but not**
 16 **necessarily to wear them.**
 17 Q. Yes.
 18 **A. I think that has been discussed.**
 19 Q. And understood. You would take
 20 cameras.
 21 **A. Sorry, say that again?**
 22 Q. You would take cameras with you --
 23 **A. That's correct.**
 24 Q. -- to the carrying out of the search
 25 warrant. Now can we go to 3272, please.

Page 141

1 This is an exchange between Superintendent
 2 Richardson and Mr McGrail. You are copied
 3 in to the exchange, as we see at the top. I
 4 just want to check with you: at the bottom of
 5 the page there is the email from
 6 Superintendent Richardson to the
 7 Commissioner of Police. It is not clear
 8 whether you were copied in to the email
 9 sending the NDM assessment to Mr McGrail.
 10 Do you recall whether you were (or would
 11 have been) copied in to that email?
 12 **A. I don't recall being copied in, no.**
 13 Q. Because the answer comes back from the
 14 Commissioner of Police, and you are then
 15 copied. And it says as follows, "I've perused
 16 the document you attached to your email
 17 below. On the basis of the information
 18 contained in this document, I support in
 19 principle the suggested course of action. As
 20 you know, the tactical detail of how you
 21 intend to set to achieve the objectives will be
 22 the subject of further consideration, mainly to
 23 safeguard operational security. Given the
 24 complex nature of this investigation and the
 25 reputational risks at stake, I would ask that

Page 142

1 you consult with the DPP to ensure our
 2 intended activity is legally supported." What
 3 did you understand Mr McGrail, the
 4 Commissioner of Police, to mean by "tactical
 5 detail"? " As you know, the tactical detail of
 6 how you intend to set to achieve the
 7 objectives will be the subject of further
 8 consideration", what did you understand him
 9 to mean by "tactical detail"?
 10 **A. In policing, there are command structures**
 11 **which are in place. We usually call them**
 12 **Gold, Silver or Bronze. Gold being strategic,**
 13 **Silver being tactical and Bronze being**
 14 **operational. Tactical command usually refers**
 15 **to tactical parameters, priorities, it kind of**
 16 **gives parameters as to how you deal with an**
 17 **operation. I'm not sure specifically what he**
 18 **meant in terms of that, but certainly tactical**
 19 **generally means it's kind of a - a mid-level**
 20 **command structure that oversees those**
 21 **tactical decisions.**
 22 Q. At what sort of level would a search
 23 warrant fall, within that hierarchy?
 24 **A. It depends; you may have all three, but**
 25 **certainly the ex-- so for example, the**

Page 143

1 **execution of a warrant would usually be**
 2 **considered an operational, because it's about**
 3 **how you do the - so, you will have been**
 4 **given a objective, your priorities, but doing -**
 5 **the - how you implement those - those**
 6 **strategies is - are an operational decision. So**
 7 **for example, in terms of the search warrant:**
 8 **was it done by consent or was it enforced on**
 9 **the day. That would have been an**
 10 **operational decision that Mr Richardson was**
 11 **able to make on the day of - of execution, or**
 12 **not.**
 13 Q. So, what did you understand the
 14 reference to "tactical detail" to be? What sort
 15 of things was the Commissioner of Police
 16 asking Superintendent Richardson to...
 17 What was he referring to, when he said
 18 "tactical detail", if he was not referring to the
 19 search warrant?
 20 **A. It's not that he - he may not have been**
 21 **referring to the search warrant, I'm not clear**
 22 **whether he was, and - sorry.**
 23 Q. Well, I think I have asked enough on that.
 24 It is not your email, so I don't think --
 25 **A. Sure.**

Page 144

<p>1 Q. -- I think I've pushed it as far as 2 necessary. The second paragraph there is the 3 suggestion to consult with the DPP to ensure 4 "our intended activity" is legally supported. 5 Again, what do you understand Mr McGrail 6 to mean by "our intended activity"?</p> <p>7 A. The response is - sorry, this is sent on 1 8 March --</p> <p>9 Q. 1 March.</p> <p>10 A. -- following the sending of the NDM. Is 11 it just the NDM that's sent to him?</p> <p>12 Q. I believe that is the case.</p> <p>13 A. So, clearly the intended action relates to 14 Mr Levy, and the action intended to take on 15 the basis of, I would imagine, firstly in terms 16 of his status as a suspect, and secondly 17 whether or not the search warrant was 18 appropriate. I mean, I can't say for certain, 19 but it seems to be a general request.</p> <p>20 Q. And, how did you consider that you 21 complied with that request?</p> <p>22 A. The next meeting that we had was with 23 the DPP, on the third I believe it was. And 24 during that meeting Mr Richardson, as far as 25 I can recall, explained the NDM to the DPP,</p> <p style="text-align: center;">Page 145</p>	<p>1 Q. Other than this email, was Mr McGrail's 2 advice expressly sought (as far as you are 3 aware) on whether a search warrant should 4 be obtained against Mr Levy?</p> <p>5 A. Sorry, say that (inaudible).</p> <p>6 Q. Sorry, let me reorder that. As far as you 7 are aware was Mr McGrail's advice expressly 8 sought, on whether a search warrant should 9 be obtained against Mr Levy?</p> <p>10 A. I don't recall whether the question was 11 asked. I do recall (and I'm not sure if it's this 12 meeting) that he very much said: it's an 13 operational matter. Effectively: it's not 14 something that I can deal with, that's 15 something that the police should deal with.</p> <p>16 Q. Sorry, I meant Mr McGrail.</p> <p>17 A. Oh, sorry.</p> <p>18 Q. Mr McGrail's advice. Was Mr McGrail's 19 advice sought, on whether a search warrant 20 should be obtained against Mr Levy?</p> <p>21 A. Oh sorry, my apologies.</p> <p>22 Q. Other than this email.</p> <p>23 A. Not to my knowledge.</p> <p>24 Q. 3 March 2020, you have just mentioned 25 there was your meeting with the DPP and</p> <p style="text-align: center;">Page 147</p>
<p>1 went through the NDM itself, and just 2 explained our rationale for why we had 3 drawn the conclusions we had.</p> <p>4 Q. So you consider that you did comply with 5 that request by Mr McGrail?</p> <p>6 A. To the extent that we went and we 7 consulted with the DPP on the NDM, which 8 was the document that had been sent to him, 9 yes.</p> <p>10 Q. Just specifically on the search warrant, 11 did you understand from this that you should 12 seek advice from the DPP on whether to 13 obtain a search warrant?</p> <p>14 A. It's not clear, and I - and I think this is - 15 there's a slight confusion, because the DPP 16 (as far as I can recall) very much set the red 17 line that it was an operational matter, when it 18 came to the production order and the search 19 warrant. That was my recollection. It's not a 20 view that I necessarily understood, in light of 21 how I described what "operational" was. 22 But, my recollection was that he set that red 23 line: that it wasn't something that he would 24 get involved in. That's my recollection, 25 although I may be wrong.</p> <p style="text-align: center;">Page 146</p>	<p>1 Superintendent Richardson. The note is at 2 B3197. It says, "Meeting with the DPP 3 regarding JL. Advice requested on whether 4 his involvement amounts to a criminal 5 offence. Full report drafted by 6 Superintendent Richardson. Relevance: 7 consideration of whether JL has committed a 8 criminal offence." Did the DPP advise on 9 whether Mr Levy had committed a criminal 10 offence, in that meeting?</p> <p>11 A. To the extent that his view was that he 12 considered it to be sharp business practice.</p> <p>13 Q. Why is that not recorded in your note?</p> <p>14 A. I can't say for certain. The recollection 15 that I have was that if it was said at that 16 point, and I think it may have been 17 subsequently, and I am slightly in two minds 18 as to whether it was said at this point or at 19 both points - this point and a later meeting. 20 If it was said, my interpre-- interpretation 21 was: it was a - it was a - it was a comment, 22 but there was no force behind the comment, 23 and there was certainly no legal analysis 24 behind the comment. So it was not: I would 25 go for a production order for the following</p> <p style="text-align: center;">Page 148</p>

37 (Pages 145 to 148)

<p>1 legal reasons. It was: now is (?) not the 2 time... Sorry, sorry. 3 Q. I am sorry to interrupt you, but I think 4 you're straying into the production order. 5 A. Sorry. 6 Q. I'm talking about the advice on the 7 substantive criminal offence. 8 A. Yeah, sorry. 9 Q. Because this is the 3 March meeting, and 10 there were two meetings: there was the 3 11 March and then (let us just get the timeline 12 correct) you go away and produce the 13 charging report... 14 A. That's right; you're right. (?) 15 Q. And then you go back to the DPP, and it's 16 on 8 April that you have your Zoom meeting, 17 where his position has changed in the light of 18 the charging report. But at this meeting, you 19 said earlier that he made - that he expressed 20 that he considered it to be sharp business 21 practice, and I am just asking why that is not 22 reflected in your note? 23 A. I - I don't recall. 24 Q. Because, it is not reflected in 25 Superintendent Richardson's notes either. Is</p> <p style="text-align: center;">Page 149</p>	<p>1 A. I did. 2 Q. And, Mr McGrail is not included in the 3 email chain between you and Mr Richardson. 4 Did he see the charging report before it was 5 sent to the DPP? 6 A. I didn't send it on to Mr McGrail. I don't 7 know whether he saw it before... 8 Q. Did -- 9 A. Sorry... I'm just try-- I'm just trying to 10 confirm whether there was an email that was 11 co-- was copied into. But I can't recall, at the 12 moment. 13 Q. The charging report identified 76 possible 14 charges. Why were so many charges 15 proposed at that stage? 16 A. For - for effectively the same reason as I 17 discussed previously: that my role is to 18 identify each instance of a possible offence, 19 and then I would put that before the OCPL or 20 the DPP, for them to make a determination of 21 the number of charges they felt was justified 22 or should be put before a jury. 23 Q. And the increase of 25 charges from 51 in 24 January, how did that arise? 25 A. It may have arisen because Mr Galliano</p> <p style="text-align: center;">Page 151</p>
<p>1 there a reason why that is not recorded 2 anywhere? 3 A. That's no reason that - that I can think of 4 at the moment why it wouldn't be. 5 Q. Is it correct to say that this meeting took 6 about two hours? 7 A. I don't recall the le-- length of the 8 meeting. 9 Q. The note refers to a full report drafted by 10 Superintendent Richardson. Is that a 11 reference to the NDM? 12 A. That's my understanding, yes. 13 Q. And did you or Superintendent 14 Richardson give the DPP a copy of the NDM 15 report, during this meeting or beforehand? 16 A. My only recollection is Mr Richardson 17 going through the NDM report, I couldn't say 18 if it was handed over. 19 Q. So, you are saying that he went through it 20 during the meeting? 21 A. Yes. 22 Q. Now let us go to the charging report, 23 please. B3612. Sorry, I am just getting to it 24 myself. You drafted this charging report and 25 sent it to Superintendent Richardson, correct?</p> <p style="text-align: center;">Page 150</p>	<p>1 wrote a number of statements; it may have 2 arisen because he provided additional 3 statements and additional statements. 4 Alternatively, it may be that I reviewed them 5 again and took a slightly different view on 6 how things should be considered, and 7 increased, but I couldn't tell you. 8 Q. Can we look at 3630 now, please. That is 9 the section at the top of that page, which is 10 titled "Knowledge of computer misuse 11 offences, Levy". And, there are three 12 paragraphs in that section. The report cites 13 two pieces of evidence in support of the 14 allegation that Mr Levy knew about the 15 sabotage of the NSCIS. 132 is a message of 16 19 October 2018 from Cornelio to Levy 17 saying, "Morning James. Very confidential, 18 note Gaggero has brought in a forensic team 19 of six to look at anything John and I may 20 have done to tamper with the system etc. 21 Gaggero's going all out, it seems." And then 22 133, "In a text to Perez the same day 23 Cornelio stated that he had spoken to Levy 24 and was told not to worry." And the 25 conclusion is that "Evidence indicates that</p> <p style="text-align: center;">Page 152</p>

1 Levy discussed the forensic team with
 2 Cornelio, and that he had given him advice
 3 about the situation." Can you explain how
 4 those messages show knowledge of alleged
 5 sabotage by Cornelio on Mr Levy's part, as
 6 far as you were concerned, please.
 7 **A. I can, al-- look - yes, okay, I'll start with**
 8 **this section here. So, the - on 19 October**
 9 **there'd been a number of suspected offences,**
 10 **which included the...**
 11 Q. I will just stop you there, just to be
 12 cautious about this.
 13 **A. I understand, yes.**
 14 Q. Just for everybody's benefit: if you feel
 15 that you have to go to --
 16 **A. Sure.**
 17 Q. -- any redacted information then please
 18 say so, and we will go into private. But for
 19 the time being, if you could answer on the
 20 basis of non-redacted information.
 21 **A. Absolutely. The text suggests that Mr**
 22 **Cornelio had become aware that James**
 23 **Gaggero had brought in a forensic team to**
 24 **analyse the NSCIS platform, and the texts**
 25 **indicate that he was concerned about it.**

Page 153

1 **that worry reduced, then in seeking advice**
 2 **from somebody and being told not to worry,**
 3 **you wouldn't gain any of that unless you told**
 4 **the other individual the entirety. Otherwise**
 5 **whatever advice they gave you would be**
 6 **based on half of the information and**
 7 **therefore that would give you no sense that**
 8 **would help you reduce that kind of distress**
 9 **or concern that you have.**
 10 **So what I looked at is there was a possibility**
 11 **that he may have given all the information**
 12 **across, and therefore James could properly**
 13 **advise him and therefore reduce that level of**
 14 **concern. I suppose that's the thought process**
 15 **that I go through.**
 16 Q. Sorry, just bear with me. Just moving to
 17 the next section, 135 to 137 -- and I would
 18 ask you to be doubly careful here because
 19 this is where my learned friend Mr Carauna
 20 starts looking at me very intently -- can we
 21 just look at those three paragraphs? 135:
 22 "By 2019 Levy was in no doubt that Cornelio
 23 and 36 North had not been contracted to
 24 maintain the NSCIS platform. Despite this
 25 fact he did not question Cornelio accessing

Page 155

1 **Now, I say that not just because of 132, but if**
 2 **we go to the text at 133 (which I will come to**
 3 **in a moment) it suggests that he had concern**
 4 **about what was happening. The first person**
 5 **he wrote to was not his colleague, Mr Perez;**
 6 **the first person he wrote to was Mr Levy.**
 7 **The subsequent text to Mr Perez, if I could**
 8 **go to it -- I am not sure where it is, let me see**
 9 **if I can find it.**
 10 **(14.00)**
 11 Q. Is that 117?
 12 **A. Yes, it is, thank you. The subsequent text**
 13 **he sends to Mr Perez saying, "Spoke to**
 14 **James reference forensic team confidentially**
 15 **...", please stop me if there should be some**
 16 **redaction, "... spoke to him on the phone.**
 17 **Call me and I can discuss." He says, "Not to**
 18 **worry. I am very concerned they will try to**
 19 **prove I have acted to sabotage the system in**
 20 **any way."**
 21 **The first point I would make is his first port**
 22 **of call was Mr Levy, but also he's worried**
 23 **about what's happening. And my**
 24 **interpretation of that was that if he wanted to**
 25 **get any -- wanted to be placated, if he wanted**

Page 154

1 the system in April 2019."
 2 And on 11 April 2019, Cornelio wrote to
 3 Levy:
 4 "I am preparing a report for Caine/Albert
 5 Mena with regards to the failures of the
 6 national security platform of which ..."
 7 Then jump to:
 8 "... Lesley is preparing a legal letter for your
 9 review in an attempt to speed up the process.
 10 This is okay?"
 11 He went on to say:
 12 "We are going to have a field day on the
 13 national security report, just wait until you
 14 see it. For now I am reviewing every single
 15 module one by one."
 16 Then at 137, on 23 April 2019, he wrote to
 17 Levy:
 18 "Note I provided Albert Mena with a report
 19 on the national security system. Has he made
 20 any comment to you about this? The report
 21 would have been delivered to him via Caine."
 22 Again, without going into the redacted
 23 information, please -- and if you have to then
 24 we can deal with that later -- but just how do
 25 you consider that this added to your grounds

Page 156

1 to suspect Mr Levy of the offence of
 2 conspiracy to defraud?
 3 **A. By 2019, if you recall, I mentioned that**
 4 **on 4 October the Chief Minister had given**
 5 **explicit instructions that Mr Cornelio should**
 6 **no longer access the platform. Mr Levy was**
 7 **aware of this certainly, and we can evidence**
 8 **that by a number of texts which are sent by**
 9 **Mr Cornelio to Mr Levy about getting the**
 10 **platform back.**
 11 **So Mr Levy was in no doubt that he should**
 12 **not have been accessing post October of the**
 13 **year before, and the -- this suggests very**
 14 **clearly that he was accessing the system in**
 15 **contravention of the instructions that had**
 16 **been given by the Chief Minister -- in fact,**
 17 **not just the Chief Minister, a number of other**
 18 **people -- and in contravention of a number of**
 19 **other documents as well.**
 20 Q. Can we now turn, please, to 3666?
 21 **A. There is a comment I would like to make**
 22 **on that if I could. But I am conscious if you**
 23 **want me to take it to private, I am happy to**
 24 **do so.**
 25 Q. Sorry, if you just bear with me one

Page 157

1 second.
 2 **A. Sure.**
 3 Q. Without going into detail or giving in any
 4 qualitative degree, did the seriousness of
 5 what was being said in terms of the -- did the
 6 seriousness of the impact on the NSCIS or
 7 the seriousness of the issues, did that
 8 influence your views as to the grounds?
 9 **A. Yes, but not just that.**
 10 Q. You just said that the comments -- well,
 11 just to follow-up on that: why? Why do you
 12 say yes? I really don't want to push you into
 13 a scenario, though, where you feel you can't
 14 answer. So if you can't comfortably answer,
 15 then I would rather you answer in private.
 16 **A. I would prefer not to at this stage.**
 17 Q. Very well. Just 3666, please. At the top
 18 of that page, there is a list of charges. In the
 19 preceding paragraph, you have asked for
 20 advice on the -- well, for the DPP to consider
 21 the charges in accordance with the code for
 22 prosecutors. Then at 338, you specifically
 23 say:
 24 "In addition to the proposed charges, advice
 25 is also sought as to whether based on the

Page 158

1 above evidence there are reasonable grounds
 2 to suspect that Levy has committed the
 3 offence of conspiracy to defraud and/or any
 4 other criminal offences."
 5 Then:
 6 "In the event that there are reasonable
 7 grounds to suspect Levy has committed any
 8 offence, the police will consider whether it is
 9 necessary to conduct further investigations in
 10 the form of search warrants, interview under
 11 caution ..."
 12 It is clear from that, isn't it, that you were not
 13 seeking the DPP's advice at that stage
 14 anyway as to whether a search warrant could
 15 and should be obtained, if there is a reference
 16 to "the police will consider"?
 17 **A. Yes, you are right.**
 18 Q. I have just been helpfully handed
 19 a reference to B -- sorry, yes, just one further
 20 question on that. Do you think you might
 21 have benefitted from legal advice on the
 22 decision as to whether it was necessary to use
 23 search warrants or interview under caution?
 24 **A. I do.**
 25 Q. Can we just turn to 3623, please, and

Page 159

1 paragraph 79. This is a message on 27
 2 March 2019. It is Cornelio to Levy and it
 3 says, "Do you think there is any chance of
 4 getting national security contracts back at
 5 some point?" And Levy responds, "Yes".
 6 There is a reference to this being despite his
 7 answer on 27 December 2018. That one is
 8 set out in paragraph 76 above. It says:
 9 "By 27 December 2018, Cornelio was
 10 concerned that the Chief Minister would not
 11 be transferring the contract to 36 North. In
 12 response Levy wrote, 'I don't think he will
 13 transfer the contracts back to 36N. We have
 14 to work on alternatives. I am happy to help!'
 15 Are those the messages that you had in mind
 16 when you were talking about "taking my
 17 platform", getting the platform back, or
 18 something along those lines?
 19 There is also 77, "Any merit in me writing to
 20 the CM directly to request he meet with me?
 21 I miss my contracts."
 22 **A. I'm sorry, I can't remember the context in**
 23 **which we originally --**
 24 Q. I am sorry, I tried to shorten it but
 25 unsuccessfully. You referred earlier to the

Page 160

<p>1 fact that he was accessing the system in April 2 2019, and you said that Mr Levy knew that 3 he shouldn't be accessing in April 2019 4 because there were previous text messages 5 between them which demonstrated to 6 Mr Levy that he no longer should have 7 access, and the Chief Minister had instructed 8 him not to access. Are these the messages 9 that you are referring to? 10 A. Yes, that appears to be the case. 11 Q. Now, Superintendent Richardson sent the 12 charging report and national decision model 13 to the DPP on 1 April. Was the intention for 14 the DPP to have a range of possible charges 15 to review and prefer? 16 A. I know that the -- that Mr Richardson 17 stated that it wasn't intended to seek advice 18 on charging. I think the document ultimately 19 was intended for that purpose. But I think 20 perhaps at that stage it had been drafted in 21 order to support the information that had 22 been provided in the NDM and give the full 23 picture of what was happening. So 24 ultimately it was used to obtain charging 25 advice, but it was also appropriate to use it to</p> <p style="text-align: center;">Page 161</p>	<p>1 Attorney General, Superintendent 2 Richardson and Mr McGrail were also 3 present. Were you at that meeting on 7 April 4 2020? 5 A. No, I wasn't. 6 Q. Do you recall Superintendent Richardson 7 briefing you about that meeting after it took 8 place? 9 A. I don't recall. If there are notes to that 10 effect I certainly wouldn't say I was never 11 briefed, but to the best of my recollection 12 I don't recall a briefing. 13 Q. So are you able to assist with anything 14 that was said at that meeting as to whether an 15 agreement had been reached between the 16 Attorney General and Mr McGrail, 17 Mr Richardson, as to rationalisation of 18 charges ownership issue? 19 A. Mr Richardson at some point mentioned 20 the Attorney General writing a number on 21 a piece of paper. Either a number or two 22 numbers on a piece of paper. I'm not sure at 23 what point he said that, but I certainly recall 24 something to that effect. Now whether that 25 was from that meeting or not, I don't know,</p> <p style="text-align: center;">Page 163</p>
<p>1 help the DPP understand the context in which 2 the NDM sat. 3 Q. And was the expectation that the DPP 4 would decide whether to proceed with 5 particular charges? 6 A. At that stage, I don't recall because the 7 charging decision didn't come until much 8 later. 9 Q. Was the refinement of charges -- the 10 intended refinement of charges -- did that 11 relate to Mr Levy? 12 A. The refinement of charges certainly 13 related predominantly to Mr Cornelio, almost 14 exclusively, because the -- I think 72 of the 15 76 identified or possible charges related to 16 Mr Cornelio. Therefore the refining down 17 almost certainly referred to him and not to 18 Mr Levy, who we were looking at in terms of 19 a single charge. 20 Q. On 7 April 2020, there was a meeting. 21 I am happy to take you there if you would 22 like to see it, but perhaps we can work on the 23 basis that you take it from me that 24 Mr DeVincenzi appears to believe that you 25 were present at this meeting where the</p> <p style="text-align: center;">Page 162</p>	<p>1 but that's the extent to which I can assist you. 2 Q. Can we now turn to 8 April 2020 3 meeting, please, B3198. This is a record of 4 a meeting -- a video conference -- with the 5 DPP. And you say: 6 "Advice sought on the basis of the report 7 submitted by Superintendent Richardson on 8 1 April 2020. He agreed that there was 9 a realistic prospect of conviction for the 10 proposed conspiracy to defraud. He also 11 stated that there was evidence of misconduct 12 for Sanchez although this would need to be 13 discussed further. He stated that another 14 individual would be treated as a witness 15 owing to the fact that he was not 16 a beneficiary and that he had ceased to assist 17 36 North. He agreed that Mr Levy should be 18 treated as a suspect as there were questions 19 which needed to be answered. He should be 20 interviewed, file note made." 21 This note is fairly brief, so what do you recall 22 that the DPP actually said about whether 23 Mr Levy should be treated as a suspect? 24 A. Could you take me to my file note, 25 please?</p> <p style="text-align: center;">Page 164</p>

41 (Pages 161 to 164)

<p>1 Q. Sorry, your file note? We will just find 2 that. One second. I think you have it -- is 3 that your file note on screen, 3199? 4 A. Yes. 5 Q. So that refers to a conference call: no 6 grounds for him to stop any prosecution at 7 this stage; there was evidence of a conspiracy 8 to defraud; agreed with the suggestion that 9 there was an unlawfulness argument in 10 respect of the breaches of contract/civil 11 wrongs; there were still the issues of 12 ownership which needed resolving and this 13 would impact on the case; the charges may 14 need to be put together to reduce the 15 numbers. 16 Finally: "Mr Levy was considered. DPP 17 stated that there were still questions that he 18 needed to answer. Interview under caution 19 was appropriate." 20 Do you remember anything beyond your note 21 as to what the DPP said in relation to treating 22 Mr Levy as a suspect or anything else? 23 A. I don't. 24 Q. Can I take you to your third witness 25 statement, because it may assist? A1044,</p> <p style="text-align: center;">Page 165</p>	<p>1 And that's why I also said I'm not certain. 2 Q. Is there a reason why, if he said that to 3 you in a meeting, there is no written record 4 of that statement in any of your notes? 5 A. If he said that -- and I think I spoke to 6 before -- the recollection I have of him 7 referring to it was just a comment without 8 any substantiation in terms of why he would 9 have preferred a production order over 10 a search warrant. Certainly, whether at that 11 point or at the point which was transcribed 12 with the Attorney General meeting, my initial 13 thoughts on it were that it appeared to be -- it 14 appeared to have been said because of the 15 individual, as opposed to any considered 16 legal argument as to why that should be the 17 case, if that makes sense. 18 Q. If the DPP was expressing this view, 19 though, do you not consider that it was an 20 important matter that merited recording? 21 A. It would merit -- yes, and in hindsight it 22 would have been -- it would certainly be 23 useful to have recorded that. But in -- in the 24 context of a comment that is made which is 25 given no importance by the DPP himself, that</p> <p style="text-align: center;">Page 167</p>
<p>1 you say at paragraph 31, not specifically in 2 relation to the 8 April meeting, I should say, 3 but you do say: 4 "I recall but I am not certain that prior to the 5 application for the search warrant, the DPP 6 expressed the view that whilst he would have 7 applied for a production order rather than 8 a search warrant, this was an operational 9 matter for the RGP. He further stated that if 10 the use of a production order were to be 11 challenged by judicial review, he would 12 defend the RGP's position, and that in his 13 view we would be successful." 14 Do you recall whether that's something that 15 he said at the 8 April meeting, or are you 16 unable to say? 17 A. I'm not certain. The reason I wrote that 18 was in a subsequent meeting, which is 19 transcribed, with the Attorney General, he 20 made reference to the fact that he would have 21 preferred a production order over a search 22 warrant. And I recall during that meeting 23 thinking to myself "that's what you told us 24 previously", and that's the reason why I think 25 that he had said it in a previous meeting.</p> <p style="text-align: center;">Page 166</p>	<p>1 may account for the fact why I or 2 Mr Richardson didn't give it any importance. 3 Q. Did it make you pause for thought as to 4 whether a warrant was an appropriate 5 measure? 6 A. I'm not sure whether it did. What I can 7 say is that if he had expressed it in terms, and 8 a strength of terms, that made it clear that it 9 was important to him, or reduced it into 10 writing in a response to the extensive report 11 that had been given, certainly we would -- we 12 would certainly have given it thought. That 13 may account for the fact why we didn't give 14 it the importance that perhaps it deserved. 15 Q. Did it make you think you should take 16 independent legal advice on the question of 17 a warrant? 18 A. I think the response that the DPP gave, 19 that it was lawful and defensible, gave us 20 comfort that we weren't doing anything that 21 was outside of the law. And almost said "this 22 is my preference but I totally understand 23 yours, it's legal ...", I am not sure -- like 24 I said, if he'd have responded with a strength 25 that, you know, "I really don't agree" or</p> <p style="text-align: center;">Page 168</p>

42 (Pages 165 to 168)

1 **"there are real legal concerns here", that**
 2 **would have given much more pause to**
 3 **reconsider.**
 4 Q. Mr McGrail was not at this meeting. Did
 5 you or Superintendent Richardson report
 6 back to Mr McGrail the DPP's express
 7 preference for a production order?
 8 **A. I did not. But as I said before, I only**
 9 **briefed Mr McGrail, I think, on a single**
 10 **occasion.**
 11 Q. We are going to turn to the options report
 12 next. We may as well do that before, I think,
 13 we might take a break. We might as well get
 14 through this document. B3277, please.
 15 This is an email from you to Superintendent
 16 Richardson, referring to a report in relation to
 17 options for interviewing Mr Levy. Now,
 18 paragraph 1, over the page:
 19 "The intention of this report is to consider the
 20 options available when dealing with
 21 Mr Heine Levy in respect of Operation
 22 Delhi. Based upon the advice offered by the
 23 DPP it is our intention to interview Mr Levy
 24 on the basis of a conspiracy to defraud."
 25 Paragraph 4 says:

Page 169

1 "Whilst there has been a substantial time
 2 since the alleged offences took place, there is
 3 still a requirement to seize digital devices.
 4 Given that we suspect that an offence may
 5 have been committed, and in order to prevent
 6 lost/destruction of evidence, we would
 7 ideally secure the evidence in situ and
 8 without giving Mr Levy prior notice of our
 9 intent. On arrival at the premises we would
 10 therefore seek in the first instance to be
 11 granted access to the relevant devices
 12 without the use of a warrant. A warrant
 13 would only require execution where
 14 cooperation was not offered."
 15 So your view in that introduction is that you
 16 should be proceeding by way of search
 17 warrant; is that correct? Well, or at least
 18 attend with a search warrant and execute the
 19 search warrant unless there was voluntary
 20 handing over of the devices?
 21 **A. Yes.**
 22 Q. Then if we go to paragraph 15, please, it
 23 says:
 24 "Mr Levy could be requested to attend the
 25 police station. He could be asked to bring

Page 170

1 any devices for analysis and to submit to an
 2 interview. However, this would notify
 3 Mr Levy of our intentions and would thereby
 4 risk the loss of evidence. This would be
 5 contrary to the way we have dealt with the
 6 other suspects, although we could argue that
 7 given the amount of time he would be well
 8 aware of the arrests and of the police
 9 investigation."
 10 Did you at the time have reason to believe
 11 that Mr Levy, specifically, would destroy
 12 evidence?
 13 **A. Yes.**
 14 Q. What was your basis for that belief?
 15 **A. To explain that belief, I would have to go**
 16 **back to the charging reports and the NDM to**
 17 **fully explain. But I can, if it assists, go to the**
 18 **NDM and give an overview of why I believe**
 19 **that was the case.**
 20 Q. Why don't we go to the NDM first of all
 21 and then, if you feel you need to go into any
 22 more detail, we can go to the charging
 23 advice. 3452, please.
 24 **A. 3455, top of the page.**
 25 Q. 3455. Top of the page 3455, that's your

Page 171

1 grounds to suspect that the agreement to
 2 deprive Bland Ltd of the NSCIS maintenance
 3 contract was to do so by dishonesty?
 4 **A. That's correct. So the -- as I said**
 5 **previously, I believe that I drafted this**
 6 **section based on the charging reports. It**
 7 **doesn't in fact include all of the points ideally**
 8 **I would have put in, but what it does is it**
 9 **goes to suspected dishonesty, which is an**
 10 **element of the conspiracy to defraud. And**
 11 **there are a number of pieces of evidence that**
 12 **support each of those statements to suggest**
 13 **that Mr Levy may have been acting**
 14 **dishonestly in connection with the NSCIS**
 15 **platform. That dishonesty, therefore, may**
 16 **have meant that if he was capable of**
 17 **conducting business in this way and acting**
 18 **dishonestly, he would be less likely to hand**
 19 **over his devices because he was capable**
 20 **himself of dishonest acts.**
 21 **I am happy to go to the evidence in support**
 22 **of that, because I think the evidence really**
 23 **does show acts that we considered to be**
 24 **either unlawful or dishonest or both. And**
 25 **that's certainly the basis on which we**

Page 172

<p>1 questioned whether or not we could rely on 2 him providing – sorry, let me qualify that. 3 That's certainly the discussions that we were 4 having at that time about Mr Levy. 5 Q. Thank you. I think that's probably an 6 opportune moment for us to take a pause for 7 five minutes because we have been going for 8 an hour and a half and we can come back. It 9 will give the transcribers a rest as well. 10 THE CHAIRMAN: Certainly. 11 (2.30 pm) 12 (Adjourned for a short time) 13 (14.44) 14 MR SANTOS: We were just looking at the 15 NDM. Can I just ask you to turn to the 16 following page, 3456, paragraph 35. It says: 17 "Given the political sensitivities and potential 18 reluctance for a JP issue a warrant for Hassan 19 Law Practice, the warrant should be 20 requested from the Chief Justice." 21 I asked you about that but can I just ask you: 22 what do you mean by political - or, sorry, 23 what do you understand by political 24 sensitivities? 25 A. I didn't write this section. Yes, okay.</p> <p style="text-align: center;">Page 173</p>	<p>1 Sorry, just remind me, sorry, which 2 document are we talking about? 3 Q. This is the options report. 4 A. The options report. Apologies. No. 5 Q. In paragraph 4 you say, in the 6 penultimate line: 7 "We would ideally secure the evidence in 8 situ and without giving Mr Levy prior notice 9 of a warrant." 10 Can you explain why it would be ideal not to 11 give Mr Levy prior notice of RGP's intent. Is 12 that for the reasons that you gave earlier as to 13 why, with reference to the National Decision 14 Model document? 15 A. In terms of possible destruction, yes. 16 Q. Just going back to paragraph 15 of that 17 document, I took you to the request to attend 18 the police station, then the penultimate line 19 of 16: 20 "Although we could argue that given the 21 amount of time he will be well aware of the 22 arrests and of the police investigation," 23 did you ever discuss this counter-argument 24 with Superintendent Richardson or Mr 25 McGrail, Commissioner of Police?</p> <p style="text-align: center;">Page 175</p>
<p>1 The political sensitivities, I would imagine, 2 relate to the fact that it is Hassans law firm 3 and the connection in terms of politics. 4 Q. Can we go back to the options report, 5 please. Before we leave this, can I just also 6 show you the final paragraph, B3457. 39, 7 this is the one that refers to the body worn 8 footage, but just the first sentence: 9 "It is expected that any allegation of 10 impropriety or illegality will be vigorously 11 attacked using Hassans' considerable legal 12 resources." 13 In your experience is that something that 14 occurred subsequently? 15 A. Yes. 16 Q. Can we move now to the options report, 17 B3277, please. On 22 April 2020 - we have 18 looked at this report already - did you or 19 Superintendent Richardson send this to Mr 20 McGrail? 21 A. I don't believe I sent it to Mr McGrail. I 22 can't say whether Mr Richardson did. 23 Q. Did you or Superintendent Richardson 24 send this to the DPP? 25 A. (Pause) I don't recall whether this ...</p> <p style="text-align: center;">Page 174</p>	<p>1 A. I don't believe so. 2 Q. Is there any reason why this counter- 3 argument was not included in the information 4 that was submitted to the Magistrates' Court? 5 A. I didn't draft the information so I couldn't 6 tell you. 7 Q. In A1043, your witness statement, 8 paragraph 28 and 29, you say: 9 "I do not recall whether there were any 10 counter-arguments regarding the fact that Mr 11 Levy KC may have known about the 12 investigation for many months. However, 13 while Mr Levy KC may have known that 14 there was an investigation regarding the 15 NSCIS platform and 36 North Ltd as set out 16 at paragraph 3, he was not formally 17 considered a suspect until 8 April 2020. It is 18 also of note that modern police digital 19 forensics are capable of recovering deleted 20 messages and emails." 21 Do you think that those two points are things 22 that should have featured in the information? 23 A. Sorry, can you just scroll up very slightly 24 just so I can read the top? (Pause) Yes. 25 Q. B3283, please. This is an email by you to</p> <p style="text-align: center;">Page 176</p>

44 (Pages 173 to 176)

<p>1 Mr Richardson: 2 "Sir, we are in the process of starting to draft 3 schedule 1 warrants." 4 Does this mean that by this point Mr 5 Richardson had approved the options report 6 that you had sent to him, or at least the 7 decision to go by way of warrant? 8 A. Certainly the decision to go by way of 9 warrant, yes. The options report was largely 10 about Covid. 11 Q. Was Mr McGrail involved in that 12 decision, as far as you are aware? 13 A. As far as I was aware, no, he wasn't. 14 Q. Do you consider to this day that it was 15 appropriate to apply for a warrant? 16 A. I do. 17 Q. What factors were considered in favour 18 and against going for a search warrant? 19 A. In terms of counter-arguments, and I 20 think that is reflected in my statement, I don't 21 recall real counter-arguments as to why it 22 shouldn't. It was predominantly arguments 23 as to why it should, and perhaps that's 24 because the way that we were reading the 25 law in terms of the additional factors that you</p> <p style="text-align: center;">Page 177</p>	<p>1 the first reference is here, it is the red 1: 2 "We have no lawyer to review the privileged 3 material. I would suggest that we contact the 4 DPP to see whether instructing/contacting a 5 local lawyer is a viable option." 6 That is a message from you to Mr 7 Richardson on 30 April. Does this mean that 8 you consider the possibility of there being 9 legally privileged material in the devices that 10 you plan to seize? 11 A. Yes. 12 Q. Did Superintendent Richardson respond 13 to that email? I ask that because there is a 14 chaser on 4 May, in the previous page. Did 15 you have a discussion between those emails 16 or were you simply raising it again? 17 Actually, let me just take you to the 18 preceding email, 4 May: 19 "Grateful if you could please consider the 20 issues raised in my previous email below in 21 respect of the Levy search warrant." 22 So that looks to me like you were chasing 23 your email of 30 April. Did you have a 24 discussion between those emails or were you 25 still waiting for a discussion?</p> <p style="text-align: center;">Page 179</p>
<p>1 need to consider, we - certainly I - considered 2 that if you had surmounted those particular 3 elements of the law that a search warrant was 4 the right mechanism to use. 5 Q. Did you consider it relevant that Mr Levy 6 was a senior lawyer? 7 A. I don't believe I did. 8 Q. In your view would a production order 9 have achieved the outcomes that were being 10 sought by the investigative team? 11 A. It's difficult to say in the circumstances, 12 given that we never had access to the phones 13 to know whether what we did was the right 14 course of action on the day. You will 15 certainly be aware that we didn't execute the 16 warrant and he was given some time. Now, 17 whether that led to a loss of information, I'll 18 never be able to say. I certainly don't want to 19 suggest that that's what happened but without 20 actually knowing what was on those devices 21 I'm not sure I could say. 22 Q. Can we now turn to your email of 30 23 April 2020, B3285. There is a series of 24 emails here where you refer to having a 25 lawyer reviewing the privileged material, so</p> <p style="text-align: center;">Page 178</p>	<p>1 A. The email suggests that we hadn't 2 discussed it by that time. 3 Q. Did you or Superintendent Richardson 4 ever contact the DPP about this issue? 5 A. I don't recall. 6 Q. Was a local lawyer ever instructed to 7 review the privileged material? 8 A. Not to my knowledge. 9 Q. Why did you not engage a lawyer prior to 10 the search warrant being executed, or 11 attending to execute the search warrants to be 12 precise? 13 A. From my memory, I don't know the 14 answer to that question. 15 Q. Can we now go to the information, 16 please. If we first go to your third witness 17 statement, paragraphs 7 to 9. It is A1039. 18 You say: 19 "My emails confirm that a draft of the 20 schedule 1 warrants and the associated 21 information were provided to Inspector 22 Goldwin by DS, formerly DC, Clarke on 4 23 May 2020. I was copied in to the email but 24 do not appear to have been consulted. The 25 warrant applications were approved by</p> <p style="text-align: center;">Page 180</p>

45 (Pages 177 to 180)

<p>1 Inspector Goldwin. Whilst I did not approve 2 the final version, I believe that I was 3 involved in the early stages of drafting the 4 application." 5 Then at 9 you make the point that you 6 believe from the emails that you were self- 7 isolating due to having symptoms of Covid 8 19. Do you recall how advanced your draft 9 was before you went into self-isolation? 10 A. So reading that now it appears to be 11 misleading. I didn't draft any of the 12 application. The team - if you look at the 13 email correspondence, I always say "we" or 14 "the team" are in the process of drafting. My 15 recollection was that Mr Clarke, or Sergeant 16 Clarke, was the individual who drafted. 17 When I refer to involvement in the early 18 stages, it would have, I believe, just advice 19 on how to start the process, but I don't 20 believe I drafted or reviewed the document. 21 Q. Can I just refer you to paragraph 13, 22 which is in response to the question: 23 "What was the basis for the 24 conclusion/assertion at 322 of the application 25 that the material sought does not include any</p> <p style="text-align: center;">Page 181</p>	<p>1 involvement. It says: 2 "The above paragraphs demonstrate Levy 3 was involved in the plan to remove the 4 NSCIS contract from Bland at an early 5 stage," 6 and sets out a summary of the position. You 7 say at E: 8 "Communications show he was aware of the 9 computer misuse offences committed by 10 Cornelio." 11 That is the same messages that we were 12 looking out earlier, are set out at 99 to 100, 13 and then if we can go to 98 -- 14 A. Sorry, if I can just clarify, I didn't write 15 that. 16 Q. Sorry, yes, apologies. The information 17 sets out that information, yes, accepted. 18 3218, that is where the knowledge of 19 computer misuse offences is set out and those 20 are the messages that we were looking at 21 earlier. I have already asked you this; if your 22 explanation is going to be the same, then 23 there is no need for you to repeat yourself. 24 The question would be: what is your basis, 25 can you explain your basis for saying - the</p> <p style="text-align: center;">Page 183</p>
<p>1 legally privileged material?" 2 You say: 3 "This statement forms part of a template 4 provided to officers making applications for 5 a search warrant pursuant to schedule 1. I 6 created the said templates for the RGP based 7 upon templates utilised by officers in 8 England and Wales. There is no provision in 9 law for police officers to intentionally seize 10 material subject to legal privilege. This 11 statement simply reinforces that there was no 12 intent by police to seize such material." 13 You refer to the preceding paragraph. So 14 you drafted the template upon which the 15 information was based. Is that correct? 16 A. The template itself was taken from a UK 17 police force in and around 2012. I adapted it 18 for local legislation back then, and I presume 19 - it may have been updated since then but I 20 believe, having looked at the application, that 21 Sergeant Clarke based his application on that 22 template. 23 Q. Then if I can take you to 3243, please, 24 this is the information itself, paragraph 319. 25 That is a summary of Mr Levy's</p> <p style="text-align: center;">Page 182</p>	<p>1 information's basis for saying that Mr Levy 2 was aware of the computer misuse offences 3 committed by Cornelio? That would be my 4 question, but I imagine that your answer is 5 the same answer as you gave earlier in 6 relation to the paragraphs I showed you from 7 the charging advice. 8 A. I can't recall precisely what I said ... 9 Q. I am not trying to catch you out or 10 anything, I am just giving you the 11 opportunity that if something new or 12 different arises from these paragraphs, by all 13 means I do not want to stop you from saying 14 so, but my understanding is that they mirror 15 what is said in the charging advice in terms 16 of the messages they refer to, and I just 17 wanted to give you the opportunity to say 18 whether in fact anything new is here or it is 19 effectively the same as the charging advice. 20 A. It has come from the charging advice, 21 albeit the way I put the charging advice 22 together, the access that occurs in April 2019 23 doesn't enter the knowledge of computer 24 misuse offences and it really does form part 25 of it so it does substantiate the evidence,</p> <p style="text-align: center;">Page 184</p>

46 (Pages 181 to 184)

1 **albeit it doesn't fall within that section. I**
 2 **don't know whether it appears somewhere**
 3 **else.**
 4 Q. I think it is the preceding --
 5 **A. Oh, sorry, yes, you're absolutely right.**
 6 Q. ... preceding paragraph.
 7 **A. So the knowledge of computer misuse**
 8 **offences, should it really include the**
 9 **preceding paragraphs as well to support that**
 10 **assertion.**
 11 Q. If we go to 322, 3244, paragraph 322, this
 12 is the part that deals with special proceeding
 13 material and excluded material. The second
 14 paragraph says:
 15 "The material sought does not include any
 16 excluded material,"
 17 and then it says:
 18 "For example, the material sought consists of
 19 communications between the subjects of this
 20 application. This would not be classified as
 21 legally privileged material."
 22 Then the fifth line starts:
 23 "The material sought is not and does not
 24 contain any legally privileged material.
 25 However, it is understood legally privileged

Page 185

1 material may be present on digital devices
 2 which will be seized. All in digital devices
 3 will be reviewed by an appointed
 4 independent legal representative prior to the
 5 OIC being given access to any material."
 6 What was your understanding of why the
 7 material sought was not privileged?
 8 **A. So the operative word is "sought". There**
 9 **was no intention to seek privileged material.**
 10 **There was certainly an expectation, and I**
 11 **think he understands that it may be present,**
 12 **but there is a section - and I am sure**
 13 **somebody will confirm if I am wrong - there**
 14 **is a section of the CPA which allows the**
 15 **material to be obtained at section 29, I think,**
 16 **material to be obtained if it also forms part or**
 17 **is connected to other material, and there is a**
 18 **specific provision within that that allows the**
 19 **seizure of privileged material if it forms part**
 20 **of or is connected with the material that you**
 21 **are seeking.**
 22 Q. So was your understanding that it was
 23 lawful to search Mr Levy's devices if the
 24 material of interest was not privileged?
 25 **A. That is correct.**

Page 186

1 Q. Did you consider or are you aware that
 2 anybody else considered defining the
 3 paragraph on the preceding page, 320,
 4 defining what you sought to recover more
 5 narrowly to only capture documents relating
 6 to the investigation and which were not
 7 privileged?
 8 **A. I didn't review, but on looking and**
 9 **reading I can see that it certainly would**
 10 **benefit from that.**
 11 Q. Do you think in retrospect that the drafter
 12 of the information could have benefitted
 13 from legal advice?
 14 **A. Absolutely.**
 15 Q. Can we now go to 324:
 16 "The other methods of obtaining the material
 17 have not been tried because it appeared they
 18 were bound to fail,"
 19 and then the explanation for that - oh, sorry,
 20 can we just go to the top of page 3245:
 21 "The material sought is held by a subject in
 22 this case and it is feared if notice was given
 23 to the subject to provide this material to the
 24 OIC the subject would destroy, alter, deface
 25 or conceal the material sought."

Page 187

1 I just want to ask you: that does not go into
 2 the detail that you have gone into today as to
 3 the basis for believing that a search warrant
 4 was necessary as opposed to a production
 5 order. Would you agree?
 6 **A. I would agree. I would also agree that I**
 7 **probably would have gone into greater detail**
 8 **over and above what we have discussed.**
 9 Q. Finally on this, you were aware that the
 10 DPP's preference was for a production order.
 11 Given that this was an ex parte application,
 12 do you know why the decision was taken not
 13 to include that information in the information
 14 document?
 15 **A. I couldn't answer.**
 16 Q. Can we now go to the day or the warrant
 17 itself. On 12 May you attended Hassans with
 18 Mr Richardson in possession of the search
 19 warrant. We have the benefit of your body
 20 worn footage. Can we look at B3497, which
 21 are, I believe, your handwritten notes of the
 22 day of the warrant. Can you confirm that
 23 that is a copy of your handwritten notes?
 24 **A. Yes, it is.**
 25 Q. There is some parts of that that are not -

Page 188

<p>1 that relate to things that happen before the 2 recording which I just want to ask you about. 3 12.30, I believe it says: 4 "Arrival. Wait for J Chincotta. 12.30, 5 boardroom 12," 6 and then some officers waiting downstairs 7 and at Mr Levy's house. Then 12.46: 8 "Discussion with J Chincotta. PR explains 9 reasons for visit, including reasons search 10 warrants, intend to interview." 11 There was then the phone call at 12.50 made 12 by J Chincotta, and then Mr Levy calls back 13 and you are moved to an alternative 14 boardroom and Mr Levy attends. We do not 15 need to go into the detail of that, I just 16 mention that because there is the suggestion 17 by Mr Levy in his evidence that at some 18 point either Mr Richardson or you said that 19 the search warrant had been approved at the 20 highest level. Do you recall anything of that 21 nature being said to Mr Levy? (Pause) Let 22 me just take you to A1514, just to make sure 23 that I am actually putting it to you correctly. 24 Yes. Let me correct what I said. Bundle A, 25 page 1514, and then paragraph 9.4, just the</p> <p style="text-align: center;">Page 189</p>	<p>1 have been specifically: 'We have taken 2 advice regarding the search warrant,' but 3 about the intervention, given that we had 4 taken advice about considering Mr Levy as a 5 suspect." 6 Did you go into the lift with Mr Chincotta 7 and Mr Richardson? 8 A. I don't think I took the elevator down at 9 any point with Mr Richardson. He left 10 before I did and he also went off to the house 11 of Mr Levy without me, so I don't believe I 12 went down in the lift at all. 13 Q. The conversation in the boardroom was 14 cordial and it was agreed then that Mr 15 Richardson would be the only one to search 16 Mr Levy's office and home. Was that the 17 normal approach to a search warrant in your 18 experience? 19 A. It wasn't a normal approach. Search 20 warrants, the Codes of Practice do suggest 21 that you try and obtain consent from an 22 individual before executing a warrant, but 23 usually that consent is consent to search, as 24 opposed to requesting somebody to hand 25 over a device or devices. However, that is an</p> <p style="text-align: center;">Page 191</p>
<p>1 last three lines of that sentence: 2 "The RGP had, whilst at my office with the 3 warrants, told me that they had taken advice 4 'from the highest level' or similar words." 5 Do you recall anything of that nature being 6 said to Mr Levy? 7 A. I don't. 8 Q. Do you recall anything of that nature 9 being said to Mr Chincotta? 10 A. I don't. 11 Q. Was anything said that might have left 12 Mr Levy with this impression, from your 13 recollection? 14 A. Not from my recollection, no. 15 Q. I have just been passed very helpfully Mr 16 Richardson's evidence from yesterday. He 17 said: 18 "I recall a conversation with Mr Chincotta 19 specifically in the lift on the way down and 20 Javier and I were discussing the fact that this 21 was a very serious and that it was not a run of 22 the mill situation, and what I will have said 23 to Javier is: 'Please don't think that we have 24 just taken level from a junior counsel, we 25 have taken advice at a high level.' It wouldn't</p> <p style="text-align: center;">Page 190</p>	<p>1 operational decision for the SIO and one that 2 Mr Richardson was entitled to take. 3 (2.10) 4 Q. Do you think that you personally treated 5 Mr Levy differently to how you would treat 6 other suspects? 7 A. Yes. 8 Q. In what way? 9 A. I think I was very conscious about who I 10 was dealing with and it's not to suggest at all 11 that I'm not respectful to everybody, but there 12 is inevitably - you will have in your - in the 13 back of your mind who you are dealing with 14 and his provenance, and that would almost 15 certainly have been playing on my mind to 16 some degree. 17 Q. And how would that manifest in your 18 treatment of him? 19 A. Just being very cautious about making 20 sure that we dealt with him with - discretely, 21 professionally, courtesy. 22 Q. Your notes of the attendance at Midtown 23 is at B3/134. The final paragraph says: 24 "Agreements that IT would run key words 25 searches on their system in order to extract</p> <p style="text-align: center;">Page 192</p>

1 relevant emails and documents from their
 2 systems." Was that a reference to the IT
 3 department of the RGP, or the ITG
 4 department of Hassans?
 5 **A. perhaps both because I recall that we**
 6 **called up the digital forensic expert to come**
 7 **up from the RGP, but he was met with an IT**
 8 **technician from Hassans. I believe though in**
 9 **the end, actually looking at it now, it almost**
 10 **certainly refers to the IT technician from**
 11 **Hassans, who would run the searches**
 12 **because there was a discussion about the**
 13 **amount of time that it would take in order to**
 14 **run the key word searches, and obtain the**
 15 **information.**
 16 Q. If we move on to 3/133 - sorry, back to
 17 3/133 the previous day your note had said in
 18 the final paragraph, "Key word searches will
 19 be run across the devices once the seizures
 20 have been taken place." So, are you saying
 21 that the reason why you did not follow that
 22 initial plan was because it became apparent
 23 that it would take longer to run the searches
 24 than you had anticipated?
 25 **A. That's my recollection and that if there**

Page 193

1 **was an attempt to obtain perhaps even**
 2 **forensically the emails that we wanted, it**
 3 **may have an impact on Hassans as a**
 4 **business.**
 5 Q. Can we now move to the 15 May 2020
 6 meeting? B/269 please. On 15 May 2020
 7 you attended a meeting with Mr McGrail,
 8 Superintendent Richardson, the Attorney-
 9 General, the DPP and Mr DeVencenzi. The
 10 inquiry has the recording of this meeting. As
 11 you can see, there is a transcript of it. So, I
 12 do not have to ask about the detail of that, but
 13 can I first ask, did you know whether Mr
 14 McGrail was recording this meeting?
 15 **A. I didn't.**
 16 Q. You did?
 17 **A. I did not.**
 18 Q. You did not. When did you first learn
 19 that this meeting was being recorded?
 20 **A. I'm not sure. I do recall at some stage**
 21 **somebody discussing a transcript being typed**
 22 **by the - by somebody in the Commissioner's**
 23 **office, I think, but I was not 100 per cent sure**
 24 **what it related to. I think that's probably the**
 25 **first time that I recall, but at that time I didn't**

Page 194

1 **know.**
 2 Q. Was that before - around about when was
 3 that in relation to Mr McGrail's retirement?
 4 **A. I couldn't say.**
 5 Q. What was your general impression of this
 6 meeting?
 7 **A. It was strange. Certainly not what I**
 8 **expected. I am just trying to just gather my**
 9 **thoughts about how to explain why that was**
 10 **the case. It felt to me, and I was the junior**
 11 **ranking officer in a room full of individuals**
 12 **who are considered, you know... The**
 13 **Commissioner of Police, Attorney-General,**
 14 **Director of Public Prosecutions, so perhaps I**
 15 **shied away a little bit into the corner there,**
 16 **but it appeared to me as if the conversation**
 17 **revolved around a problem. There is a**
 18 **problem. How do we solve this problem? It**
 19 **was options that were being discussed about**
 20 **how this problem may be overcome, the**
 21 **problem being Mr Levy and the intention to**
 22 **interview him under caution. There were--**
 23 **The options that were discussed... If I can**
 24 **take a step back. It appeared to me that the**
 25 **Attorney-General wanted us to consider**

Page 195

1 **various options, some of which he felt were**
 2 **not appropriate, and others he wanted to**
 3 **explore further. I suppose that is the best**
 4 **way I can put it at this point.**
 5 Q. If we go to B/237 which is the non-
 6 translated version of this - I only go to that
 7 because that is what I have in my note, but I
 8 do not think it makes a huge difference.
 9 B/237. The entry at 8:17, the Attorney-
 10 General says, at the end of the first line:
 11 "What we think would be helpful for the
 12 management of the whole thing is if that
 13 interview would still go ahead, but not to
 14 have it - but not have it under caution." Is
 15 that something that the Attorney-General
 16 would typically advise on?
 17 **A. No.**
 18 Q. I think it is fair to say that Mr
 19 Richardson, Mr McGrail and you resisted the
 20 Attorney-General's proposal. Can you
 21 explain why?
 22 **A. As police officers, we are well aware of**
 23 **the legal requirements in order to obtain**
 24 **evidence. Both Mr Richardson and I have**
 25 **trained in interview. We have trained**

Page 196

1 **members of the Force in the past. We are**
 2 **well-versed with what the legislation**
 3 **requires, and we recognise that the best way**
 4 **and safest way to obtain evidence through**
 5 **questioning is to follow the established legal**
 6 **procedures. The proposals on that day took**
 7 **us away from those established procedures,**
 8 **or at least temporarily took us away from it,**
 9 **and therefore would not be a course of action**
 10 **that we would normally adopt.**
 11 Q. What was your view of the Attorney-
 12 General's conduct during the meeting?
 13 **A. I'm not sure how to explain his conduct.**
 14 **I perceived it to be almost facilitation,**
 15 **perhaps even negotiation. That is how I**
 16 **perceived it rightly, or wrongly, about how to**
 17 **deal with this particular problem.**
 18 Q. Did you feel that it was proper facilitation
 19 or negotiation or not proper?
 20 **A. There was nothing that he suggested that**
 21 **was unlawful. What it did was take us away**
 22 **from established procedures, so in terms of**
 23 **"proper", I'm not sure what you mean exactly**
 24 **by that, but --**
 25 Q. I would rather you put it in your own

Page 197

1 words actually. You do not have to adopt
 2 mine. I will not ask you to elaborate any
 3 further. If we can go to B/244... Sorry,
 4 actually B/241 please. There is an entry at
 5 19:45 and you say: "If he provides just a
 6 statement to us but not under caution it is
 7 inadmissible against him." This is you
 8 expressing the position that you just set out
 9 previously about how a statement of that
 10 nature would not be of use?
 11 **A. Yes, you know, whether that is entirely**
 12 **accurate or not, it certainly is not best**
 13 **practice and it may be subject to arguments**
 14 **as to its admissibility at the very least.**
 15 Q. Can we now go to B/244? There you
 16 raise a point - I think it is a bit further down
 17 - you say: "Can I just interject on a similar
 18 point. We need to consider that if we do deal
 19 with Mr Levy in a different way to the
 20 others, that is likely to impact the case as
 21 well and it may backfire on us later on. So,
 22 what their lawyers might be saying is:
 23 you've treated my client in a particular way
 24 but you've clearly shown preference to..."
 25 Can you explain why you raised this

Page 198

1 concern?
 2 **A. Simply for the facts as I stated it on the**
 3 **day. I felt that we had gone through a**
 4 **particular process with all of the other**
 5 **defendants through established interview**
 6 **techniques, but that we were going to give**
 7 **Mr Levy an opportunity to be dealt with in a**
 8 **different way and that might be subject to**
 9 **challenge, albeit undermine the prosecution**
 10 **at a later date.**
 11 Q. Can we go to the top of B/259 please?
 12 There Superintendent Richardson agrees that
 13 the RGB could delay carrying out the
 14 interview if Mr Levy provided a voluntary
 15 statement over the weekend." Were you
 16 happy with that proposal?
 17 **A. Sorry, which line is it?**
 18 Q. It is the first box at the time: "What if
 19 this weekend he sends us a witness statement
 20 saying I'm aware that I am under the
 21 suspicion and that the police are carrying out
 22 an investigation in this matter.
 23 Notwithstanding this, I have chosen to make
 24 this statement voluntarily of my own free
 25 will and he sets out his stall incriminating

Page 199

1 Cornelio Perez*** or not. Well, he's going
 2 to have to do it. How can he say he knew
 3 what they were doing? He can either say: I
 4 knew what they were doing and I was misled,
 5 or I don't know what they were doing, and
 6 the thing is he did know, I think, a lot of what
 7 they were doing." Then he says, after Mr
 8 (inaudible) says: "So, Paul, if he did say that,
 9 say on Sunday or Monday morning..." Mr
 10 Richardson says: "We wouldn't carry out the
 11 interview. Well, we could and we should but
 12 we could delay carrying out any interview
 13 until we considered the contents of that. If it
 14 was sufficiently robust we could discuss it
 15 with Chris." So, there is the possibility of the
 16 RGP delaying carrying out the interview if
 17 Mr Levy provided a voluntary statement.
 18 Were you happy with that scenario?
 19 **A. Happy with the scenario? No, because it**
 20 **again took us away from established**
 21 **procedures, but I understand, because I recall**
 22 **what was being discussed on that day, I**
 23 **understand why that was mooted as one of**
 24 **the options available, but it certainly wasn't**
 25 **the first option in terms of the RGP.**

Page 200

1 Q. Are you aware of such an arrangement
 2 being offered to other suspects?
 3 **A. No, not in these terms. I am aware that,
 4 and I think it may be reflected in parts of this
 5 transcript or another, that some defendants
 6 were writing either directly or through their
 7 lawyers, and that we would consider the
 8 submissions. So, it was a proposal that
 9 suggested why do you not put forward this
 10 voluntary statement; we would consider it
 11 and then we would see what occurred at that
 12 point. But if a decision is made to interview,
 13 the standard practice is an interview is
 14 conducted. You do not elicit a voluntary
 15 statement from somebody.**
 16 Q. During the course of the 15 May 2020
 17 meeting, there was also a suggestion by the
 18 Attorney-General that the Chief Minister
 19 may have informed Hassans that the DPP had
 20 advised against the search warrant. Do you
 21 recall that?
 22 **A. Yes, I do.**
 23 Q. What was your reaction to that?
 24 **A. I think I said previously I recall thinking
 25 to myself that he had articulated that**

Page 201

1 **previously. I'm not sure there was much
 2 more other reaction at that point. No, beyond
 3 that I don't think there was any... Certainly,
 4 at that point I don't think there was any other
 5 thoughts I considered.**
 6 Q. We have also seen that on the evening of
 7 13 May, two days prior to that meeting, the
 8 Attorney-General replied to a message by Mr
 9 Levy complaining about being hung out to
 10 dry in respect of the search warrants. The
 11 Attorney-General replied to that saying, to
 12 Mr Levy: "Don't worry." What are you
 13 thoughts about that exchange?
 14 **A. I don't have thoughts about it to the
 15 extent I am not sure in what context. Really
 16 "don't worry"... I mean if you could take me
 17 to it perhaps, I could --**
 18 Q. A/298 please. It is paragraph 68 of Mr
 19 Llamas' statement. I do not think we need to
 20 look at the commentary. There is a message
 21 of 13 May 2020, 20:57. James Levey: "On
 22 the other matter, I feel I've been hung out to
 23 dry, certainly not by you." Mr Llamas says:
 24 "I assume he was referring to the execution
 25 of the search warrants against him the

Page 202

1 previous day..." and I interpret his statement
 2 that it was certainly not by me, to mean Mr
 3 Llamas. Then he says: "As a matter of
 4 courtesy to him I replied but I wanted to do
 5 so without commenting or being drawn into
 6 the conversation with him about the matter,
 7 so I replied one minute later as follows:
 8 "Don't worry."?
 9 **A. It's difficult to draw much of a conclusion
 10 from there because of the responses. Simply
 11 "Don't worry."**
 12 Q. Did you feel pressured in any way during
 13 the 15 May meeting?
 14 **A. I am not sure whether I felt pressure. I
 15 can say that I went into the meeting being
 16 very certain about the manner in which we
 17 were to conduct the interviews, and we left
 18 that meeting with a different way of dealing
 19 with the matter.**
 20 Q. Can we go to B3/345 please? This is an
 21 email to you from Mr Richardson on 17 May
 22 2020 and you say, "Sir, we agree to the
 23 written account in lieu of the interview
 24 tomorrow. However, we have to be careful
 25 that this agreement is not manipulated. We

Page 203

1 have said that we will consider a written
 2 account prior to proceeding to interview, but
 3 not that we will accept a statement in lieu of
 4 any interview. His status at the moment
 5 remains that of a suspect. Whether he will be
 6 accepted as a witness will have to be
 7 determined on its merits once we have had
 8 time to consider the contents of the statement
 9 in the context of the prosecution as a whole.
 10 We do not want it suggested that he is a
 11 witness already." That is a response to an
 12 email from Mr Baglietto KC on 17 May, on
 13 the next page, which confirms that Mr Levy
 14 would give a written statement and says that
 15 Mr Levy will not be attending for interview.
 16 When you say: "we have to be careful that
 17 this agreement is not manipulated", who
 18 were you referring to as manipulating -
 19 potentially manipulating the agreement?
 20 **A. Hassans law firm, and I think that was
 21 borne out by the subsequent letter of the 20th.**
 22 Q. Can we go to B/320 please? This is the
 23 subsequent meeting on 20 May?
 24 **A. Sorry, just so that I can be clear, when I
 25 said it was borne out, the letter of 20th was**

Page 204

<p>1 the letter in which they stated that we had not 2 used the proper safeguards when asking - 3 and they were concerned about still being 4 used - still being called a suspect which is 5 why... I wasn't referring to the meeting of the 6 20th. 7 Q. Yes. Sorry, no. I am moving on to the 8 meeting. 9 A. Just so that it is clear. 10 Q. Thank you. On 20 May you attended 11 another meeting with the Commissioner, 12 Superintendent Richardson, the Attorney- 13 General and the DPP. Did you know that Mr 14 McGrail was recording this meeting -- 15 A. I did not. 16 Q. -- at the time? Did you learn about the 17 recording at the same time as you learned 18 about the recording of the 15 May meeting? 19 A. I learned of a recording. I'm not sure 20 whether I learned of two recordings. I was 21 just aware of a transcript that was being 22 typed up at some stage. 23 Q. If we go to B/309 we can see, referring to 24 the situation, the Commissioner of Police 25 says, "We have bent over, which we would</p> <p style="text-align: center;">Page 205</p>	<p>1 Q. This 20 May meeting, did you feel 2 pressured to act in any particular way at the 3 20 May meeting? 4 A. My recollection of the 20 May meeting 5 was largely about a letter which had been 6 received from Hassans. There was some 7 confirmation of what I believe had already 8 been agreed in the previous meeting, but I 9 would not describe it as any pressure, 10 although I would have to read the full 11 transcript just to double-check. 12 Q. Can we now turn to B1/417? This is a 13 WhatsApp exchange between the Attorney- 14 General and the Chief Minister. At 15:41 the 15 second message on that page - this is on 12 16 May 2020 in the follow-up to a meeting 17 between the Chief Minister, the Attorney- 18 General and the Commissioner of Police - 19 Mr Llamas says: "Spoken to DPP. He is 20 categorical that whilst he told the RGP that 21 an interview with JL would likely be 22 necessary he strongly advised against a 23 search warrant." Does that accord with your 24 recollection of the advice or anything that 25 was said by the DPP to you in relation to the</p> <p style="text-align: center;">Page 207</p>
<p>1 not have normally done." Do you agree with 2 Mr McGrail's assessment of how the RGP 3 had behaved in relation to Mr Levy? 4 A. I certainly agree that it is something we 5 would not have normally done, yes. 6 Q. Do you stand by the procedure that was 7 adopted in relation to Mr Levy? 8 A. Sorry, I don't understand the question. 9 Q. Do you, knowing how things transpired, 10 do you agree with the way that things were 11 done? 12 A. No. 13 Q. What is your disagreement? 14 A. That the best course of action is to follow 15 the established statutory requirements in 16 order to obtain the evidence, and if the 17 evidence - if by following the legal 18 requirements meant that Mr Levy gave us no 19 comment or did not respond during the 20 interview, then so be it, we would have dealt 21 with that and progressed the investigation as 22 we could, but I don't think that we should 23 have gone down the route of requesting a 24 voluntary statement which subsequently 25 came back to cause us further issues.</p> <p style="text-align: center;">Page 206</p>	<p>1 search warrant? 2 A. He did not strongly advise against a 3 search warrant. 4 Q. In your view, did he advise against the 5 search warrant? 6 A. I would put it no more than a comment, a 7 remark, that he would have used a production 8 order, but he described it as an operational 9 matter. No more than that. 10 Q. What about after 12 May? Did the DPP 11 express a view on the legality of the warrant 12 or say that he would defend the legality? 13 A. Sorry, after 12 May? 14 Q. After 12 May did the DPP express a view 15 on the legality of the warrant, as far as you 16 are aware? If it is limited to what we can see 17 in the transcripts, then we can take it from 18 the transcript? 19 A. In terms of the -- 20 Q. The legality of the warrant? 21 A. Yes. In the comments on the 15th is the 22 only recollection that I have. 23 Q. Can we go to B3/432 please? 24 A. This is a report prepared I believe by you 25 for Mr Richardson on 19 October 2020 in</p> <p style="text-align: center;">Page 208</p>

52 (Pages 205 to 208)

<p>1 order to consider whether to search devices 2 obtained from Mr Levy on 12 May or 3 whether to return them. Your conclusion 4 there, which is on page B3/443 at paragraph 5 63 you say: "In light of the points made 6 above and having regard to the evidence 7 reviewed since April 2020 we no longer 8 continue to have reasonable grounds to 9 believe that Levy committed the offence of 10 conspiracy to defraud." Then you say that 11 the correct course of action is to return the 12 devices. Do you believe that you were 13 influenced to arrive at that conclusion? 14 A. I was not influenced to arrive at that 15 conclusion because the conclusion was 16 reached based on the preceding paragraphs 17 and in light of the preceding paragraphs the 18 conclusion was correct. Sorry, can you just 19 repeat exactly what the first question - the 20 question you said? 21 Q. Do you believe that you were influenced 22 to arrive at that conclusion, whether from the 23 preceding paragraphs or anywhere else? 24 A. So, based on the information at that point 25 there was no influence. That was an accurate</p> <p style="text-align: center;">Page 209</p>	<p>1 which emails had been provided during the 2 course of disclosure by Mr Levy, there was 3 no opportunity to go back, if we had deemed 4 it necessary, and go and check whether all of 5 the emails had been provided to us. So it was 6 the act of agreeing to the voluntary statement 7 had a subsequent impact in terms of our 8 ability to investigate as we normally would 9 have done. I think that's accurate. I may 10 have to kind of reflect on it, but I believe 11 that's accurate. 12 Q. I asked whether you were subjected to 13 influence or pressure and you've described a 14 chain of events that follow, you say, from the 15 decision to accept a voluntary statement. Do 16 you accept either of those labels influence 17 pressure or would you describe it in a 18 different way? 19 A. I think I said that during the meetings I 20 didn't feel pressure, but I would describe 21 influence, and I think that's borne out by, as I 22 said, the results of the fact that we entered 23 knowing, being very confident in what we 24 needed to do, and we left, and ultimately 25 proceeded with a course of action that was</p> <p style="text-align: center;">Page 211</p>
<p>1 account of where we were. 2 Q. Was where you were as a result of any 3 influence or pressure? 4 A. I believe so. 5 (14.41) 6 Q. Can you describe what that influence or 7 pressure was. 8 A. I'm going to have to just think carefully. 9 So, the first is the manner in which we 10 agreed for Mr Levy to provide a voluntary 11 statement as opposed to an interview under 12 caution. That subsequently had an effect on 13 ... due in part to delays, which, despite 14 chasing, took us a long time to obtain that 15 statement, meant that by the time we 16 received statements, the search warrant had 17 expired. The issue therefore of the search 18 warrant had an impact, and I am not sure we 19 took legal advice on it in terms of accessing 20 the mobile phones, because we believed that 21 mobile phones had been handed over 22 voluntarily and therefore without the search 23 warrant we would have problems accessing 24 the mobile phones, and we also couldn't, if 25 we had any concerns about the extent to</p> <p style="text-align: center;">Page 210</p>	<p>1 highly unusual. 2 Q. Can I move now to a different topic, 3 which is the Chief Minister's role in 4 Operation Delhi. Can we go to B3142, 5 please. On 7 June 2020, you make a note of 6 discussions with Superintendent Richardson 7 and number 4 is, "CM still to be spoken to." 8 Why did you want to speak to the Chief 9 Minister on 7 June? 10 A. It had become apparent during the course 11 of the investigation that the Chief Minister 12 may have had information which was 13 important to understand what was happening 14 from the Government perspective during the 15 period of time where there was a transitional 16 period, or what was described as a 17 transitional period, certainly by the 18 defendants, I believe, and that he could 19 provide information about that that would 20 help us understand what was happening, plus 21 other pieces of information that we had not 22 obtained by that point, and I believe the 23 defendants had or may have pointed towards 24 speaking to the Chief Minister. 25 Q. Why had you not spoken to him yet about</p> <p style="text-align: center;">Page 212</p>

53 (Pages 209 to 212)

<p>1 this issue?</p> <p>2 A. My recollection was that Mr Richardson,</p> <p>3 Superintendent Richardson, had felt that he</p> <p>4 wanted to deal with the other defendants first</p> <p>5 and then Mr Levy before turning to the Chief</p> <p>6 Minister, and he was essentially the last</p> <p>7 individual that we needed to speak to.</p> <p>8 Q. If we go to 3165, 28 October 2020, there</p> <p>9 is another reference here, "Spoke to the SIO</p> <p>10 about the need to approach the CM. I had</p> <p>11 brought this up on a number of occasions.</p> <p>12 Previously instructed that this issue would be</p> <p>13 considered once Levy had been dealt with."</p> <p>14 That sentence "previously instructed that this</p> <p>15 issue would be considered once Levy had</p> <p>16 been dealt with", who gave that instruction?</p> <p>17 A. Mr Richardson.</p> <p>18 Q. By this point, Mr Levy had been dealt</p> <p>19 with, so why was there delay until now after</p> <p>20 that without approaching the Chief Minister?</p> <p>21 A. It's difficult to say why there was a delay</p> <p>22 during the first entry and the second and I</p> <p>23 think it's probably more apt to ask Mr</p> <p>24 Richardson about why or what may have</p> <p>25 been happening. I don't -- I couldn't tell you</p> <p style="text-align: center;">Page 213</p>	<p>1 assisted in terms of establishing access, I</p> <p>2 believe, after 4 October. But I would have to</p> <p>3 double check the statement to be absolutely</p> <p>4 sure.</p> <p>5 Q. Was the Chief Minister ever a suspect in</p> <p>6 the investigation?</p> <p>7 A. No, he wasn't.</p> <p>8 Q. A person of interest?</p> <p>9 A. This term has come up a number of times</p> <p>10 in this Inquiry. It is not a term that I'm</p> <p>11 familiar with in my professional roles. In my</p> <p>12 view, an individual is a witness until there is</p> <p>13 evidence to suspect that they have committed</p> <p>14 an offence, at which point they are elevated</p> <p>15 to suspect and, in my view, the person of</p> <p>16 interest isn't something that I understand how</p> <p>17 you categorise a person as that.</p> <p>18 Q. So, into which category would you put</p> <p>19 the Chief Minister?</p> <p>20 A. He was always a witness.</p> <p>21 Q. Can we move to a meeting which took</p> <p>22 place on 8 March 2021. If we go to A1268,</p> <p>23 please. I should say it allegedly took place</p> <p>24 on 8 March 2021. It is at paragraph 46 of Mr</p> <p>25 Cornelio's statement. He says, "I need to add</p> <p style="text-align: center;">Page 215</p>
<p>1 myself.</p> <p>2 Q. Were you concerned by the delay?</p> <p>3 A. I think -- I certainly recognised the</p> <p>4 importance of making sure that we spoke to</p> <p>5 the Chief Minister.</p> <p>6 Q. Would you have preferred to have</p> <p>7 obtained evidence from the Chief Minister</p> <p>8 prior to the charge of the former Operation</p> <p>9 Delhi defendants?</p> <p>10 A. Ideally, yes.</p> <p>11 Q. Why did you proceed to charge without</p> <p>12 the evidence?</p> <p>13 A. I don't recall why we proceeded but the</p> <p>14 charging advice was substantially developed</p> <p>15 by that stage. We'd add in all of the defences</p> <p>16 from each of the defendants as annexes and</p> <p>17 we had sent down considerable material and</p> <p>18 USBs to the DPP. He was aware that that</p> <p>19 was still an outstanding line of enquiry and</p> <p>20 advised that a charge should still proceed.</p> <p>21 Q. The Chief Minister did give a statement.</p> <p>22 Was that of assistance to the prosecution or</p> <p>23 did it hinder the prosecution?</p> <p>24 A. I recall that it assisted in some senses and</p> <p>25 it may have hindered in others. It certainly</p> <p style="text-align: center;">Page 214</p>	<p>1 to that an account of a meeting that I had</p> <p>2 with then Chief Inspector Mark Wyan on 8</p> <p>3 March 2021, so some six months after</p> <p>4 charge. On this day I attended New Mole</p> <p>5 House to hand over 300 pages of illegible</p> <p>6 documents from the dockets in the criminal</p> <p>7 proceedings. I met Mark Wyan and he took</p> <p>8 me to a communal kitchen where the closed</p> <p>9 the door and windows which connected with</p> <p>10 the common areas within New Mole House.</p> <p>11 We discussed the criminal proceedings for</p> <p>12 over an hour. The conversation did not take</p> <p>13 place under caution. There was no one else</p> <p>14 present. During this meeting I aired various</p> <p>15 grievances with the RGP's handling of the</p> <p>16 investigation and Mark Wyan apologetically</p> <p>17 repeated that I have my superiors and do not</p> <p>18 necessarily agree with all the decisions which</p> <p>19 have been taken. I believe that when he</p> <p>20 referred to his superiors he was referring to</p> <p>21 Ian McGrail and then Detective</p> <p>22 Superintendent Paul Richardson. He also</p> <p>23 expressed the hope that he could sit down</p> <p>24 with us after all this was over so that he</p> <p>25 could explain matters. Whilst this meeting</p> <p style="text-align: center;">Page 216</p>

54 (Pages 213 to 216)

1 was an odd occurrence, I am not suggesting
 2 that Mark Wyan was trying to put improper
 3 pressure on me to plead guilty or was trying
 4 to obtain a confession from me, or even that
 5 he told me anything that he should not have.
 6 What was very obvious, however, was that
 7 there was a split of opinion amongst these
 8 responsible for the progression of the case
 9 arising out of Op Delhi. Mark Wyan clearly
 10 wanted to get something off his chest but felt
 11 that he could not do so at the time."
 12 Do you recall a meeting of this nature?
 13 **A. I do.**
 14 Q. You do?
 15 **A. I recall a meeting. I don't agree with**
 16 **everything that is said. I am happy to take**
 17 **you --**
 18 Q. Would you like to clarify from your
 19 perspective?
 20 **A. Yes. Mr Cornelio had come to the station**
 21 **and we had provided the evidence for the**
 22 **prosecution to him. He had pointed out that**
 23 **there were a number of pages that were**
 24 **illegible and that needed replacing.**
 25 **Unfortunatly, at that period of time at New**

Page 217

1 **you about your grievances." And in my**
 2 **mind to say actually I believe we had done**
 3 **this properly and we tried to follow the**
 4 **correct procedures. So that's the "sit down**
 5 **with him and explain".**
 6 **I agree that I certainly wasn't trying to obtain**
 7 **any information out of him. He was**
 8 **expressing his grievances at the time and I**
 9 **had no intention of noting down what he was**
 10 **saying. When it says there was a split of**
 11 **opinion amongst the persons responsible for**
 12 **the progression of the case, the only split of**
 13 **opinion or disagreement in the entirety of the**
 14 **case that I can ever remember with Mr**
 15 **Richardson was whether or not the**
 16 **defendants should remain on bail or whether**
 17 **or not they should be released subject to**
 18 **investigation, and I expressed the view at one**
 19 **point that I felt that, given the amt of time**
 20 **that had elapsed, that perhaps we should**
 21 **consider releasing them subject to**
 22 **investigation. Mr Richardson was of the firm**
 23 **view that they should remain on bail and I**
 24 **think he articulated that in a subsequent**
 25 **email, but to my recollection that's the only**

Page 219

1 **Mole House the witness rooms were either**
 2 **full or were not available, so I took him to a**
 3 **kitchen area which is used for refreshments.**
 4 **I closed the door for privacy for Mr Cornelio.**
 5 **We started to go through the documents and**
 6 **to replace them. He was upset with the**
 7 **RGP's handling of the investigation. I do**
 8 **not, and this is the honest truth, I do not**
 9 **recall saying to him "I have my superiors and**
 10 **do not necessarily agree with all the**
 11 **decisions". I do recall saying "Perhaps some**
 12 **day we could sit down and discuss this", and**
 13 **the reason I said that was because he was**
 14 **alleging that a lot of things had been done**
 15 **improperly. I wanted to explain to him that**
 16 **we had, at every possible stage, taken advice**
 17 **on the legality of our actions and I wanted to**
 18 **express to him that this wasn't the RGP going**
 19 **on a crusade or something that wasn't**
 20 **properly considered and advice sought along**
 21 **the way. But unfortunately I felt it was**
 22 **improper, given the face that there was an**
 23 **ongoing prosecution, to talk about the**
 24 **prosecution itself. So I said, "Perhaps when**
 25 **it's over, I can sit down and maybe explain to**

Page 218

1 **disagreement that we had about the**
 2 **investigation itself.**
 3 Q. Did you ever have a disagreement with
 4 your superiors about the warrant?
 5 **A. Not to my recollection, no.**
 6 Q. In your view, did the fact that Mr Levy
 7 was not charged mean that he should never
 8 have been a suspect in the first place?
 9 **A. No, for the reasons I began to explain,**
 10 **although I understand, given time, that I can't**
 11 **go through all of the evidence, but I felt that**
 12 **there was sufficient evidence to suspect him**
 13 **of a criminal offence and therefore it was**
 14 **right for him to be a suspect.**
 15 Q. As far as you were aware, were any
 16 complaints made to you or others about Mr
 17 McGrail's actions in Operation Delhi prior to
 18 12 May?
 19 **A. No, there were no such complaints.**
 20 Q. I don't have any further questions. The
 21 only thing is that if you would like to expand
 22 on the answers that you gave to a couple of
 23 my questions in private, I am happy to
 24 arrange for that to take place.
 25 **A. I am conscious of the time and I don't**

Page 220

1 want to take up any more of the Inquiry's
 2 time. I am not sure that it will add
 3 substantial value, although there were what I
 4 wanted to explain were the considerations I
 5 had about how I considered Mr Levy in light
 6 of the evidence and with reference to the
 7 charging report to point to the particular
 8 elements of it which, combined together, and
 9 in light of the alleged conspiracy as a whole
 10 and in its totality, to express why that
 11 amounted in my view to strong evidence to
 12 suspect Mr Levy of an offence.
 13 Q. But that is not with reference to -- would
 14 that include reference to redacted material, or
 15 are you just saying you wanted to expand on
 16 one of your answers?
 17 A. Both, I think, but I am not sure whether it
 18 would serve the purpose of the Inquiry, so I
 19 am happy to step down, unless somebody
 20 believes that it is necessary.
 21 Q. Perhaps, we know that Mr Richardson
 22 will need to go into private, and perhaps we
 23 can consider whether to invite you to go into
 24 private after Mr Richardson, if that is not too
 25 much trouble.

Page 221

1 A. Sure, no problem.
 2 MR CRUZ: Mr Chairman, I do not think I
 3 have any right to ask any questions unless I
 4 have your permission. Would I have a
 5 minute or two to ask a couple of questions
 6 that I think the witness should fairly be
 7 asked?
 8 MR SANTOS: I have no objection.
 9 THE CHAIRMAN: No trouble with a
 10 minute or two, Mr Cruz.
 11 MR CRUZ: Thank you.
 12 CROSS-EXAMINATION BY MR CRUZ
 13 MR CRUZ: Mr Wyan, just to go through it
 14 very quickly, to your knowledge, did the
 15 Chief Minister or the Attorney General have
 16 any evidential information at any stage to
 17 your knowledge?
 18 A. Any evidential information ...?
 19 Q. In other words, yes, any evidential
 20 information, whether it be the National
 21 Decision Model or the charging information.
 22 Did they have any information, the Chief
 23 Minister or the Attorney General?
 24 A. Sorry, were they provided with ...?
 25 Q. Yes, by you or to your knowledge did

Page 222

1 they have any?
 2 A. Not to my knowledge, no.
 3 Q. Okay, thank you. Just very, very quickly,
 4 I think there is probably about a minute or
 5 maybe one left. In the National Decision
 6 Model, my learned friend took you to a
 7 paragraph that talked about awareness of
 8 political sensitivities, and I think your answer
 9 was that was a relationship between Hassans
 10 and the political -- but could you elaborate?
 11 Are you talking about Hassans or Mr Levy?
 12 Are you talking about Mr Levy and the Chief
 13 Minister or Hassans and the political class as
 14 a whole?
 15 A. In terms of political sensitivities, clearly
 16 there's connections to the Chief Minister as
 17 well as other individuals in Government as
 18 well, who either worked for Hassans or are
 19 on sabbatical from Hassans.
 20 Q. And in your charging advice and in all
 21 other documents we have seen you had a
 22 plan, a very clear plan, for an interview, a
 23 search warrant and an interview under
 24 caution. That is not how it ended up and you
 25 have explained your thoughts on that. You

Page 223

1 also were drawn to a paragraph at the end of
 2 that model, which said that you were
 3 expecting vigorous defence from Hassans
 4 and that is in fact what you got.
 5 A. Yes.
 6 Q. Do you think, and you can answer this in
 7 whichever way you like, do you think you
 8 got the support to resist that assault, that legal
 9 assault that should have been envisaged
 10 when the Director of Public Prosecutions and
 11 others were aware of the fact that that assault,
 12 that legal attack on whatever you did, was
 13 likely to come.
 14 A. There was support. The meeting of the
 15 20th was the Attorney General offering his
 16 support and there were subsequent supports
 17 from the DPP. But in answer to your
 18 question, I think we struggled and I think we
 19 recognised that we didn't have our own
 20 independent counsel. We felt exposed and
 21 there was a lot of pressure to respond to the
 22 letters as they came in, work that we were
 23 doing on top of other work. So, whilst there
 24 was support I am not sure that the level of
 25 support was such that we felt adequately

Page 224

<p>1 protected. 2 MR CRUZ: Thank you, Mr Wyan. 3 SIR PETER CARUANA: Sir, I wonder if I 4 might be two or three minutes. 5 THE CHAIRMAN: Yes. 6 Cross-examination by SIR PETER 7 CARUANA 8 SIR PETER CARUANA: Just three short 9 questions for you, Mr Wyan. You have said 10 that the only disagreement you have had with 11 Mr Richardson related to the question of bail. 12 A. Yes. 13 Q. You remember saying that? 14 A. Yes. 15 Q. So does that mean - if we could put up 16 B239 ... 17 A. Sorry, the number was? 18 Q. No, not you, I am talking to Mr Triay so 19 you can see it on the screen. B239 at the 20 bottom. If your only disagreement with Mr 21 Richardson was on the question of bail of the 22 former Delhi defendants, does that mean 23 therefore that you agreed with Mr 24 Richardson when he proposed that which 25 eventually became what happened, which</p> <p style="text-align: center;">Page 225</p>	<p>1 witness, provided that his statement was 2 appropriate to treat him in that way, and in 3 the middle of the page therefore - you heard 4 me put this to then Superintendent 5 Richardson - the file, yes that would be 6 useful, and Superintendent said: 7 "That I would be happy with." 8 So if you only disagreed with him about bail, 9 presumably you also shared his happiness 10 about the possibility of the interest to the 11 prosecution in its widest context of, 12 providing Mr Levy's voluntary statement 13 enabling it, that he should be treated as a 14 witness so that you could all extract this very 15 useful evidence from him which you could 16 then use against the former Delhi defendants. 17 It follows that if you did not disagree with 18 Mr - except on bail, that you agreed with him 19 about this too. Indeed, if you look further 20 down the page you yourself contributed by 21 saying: 22 "Yes, his value as a witness. That would be 23 essential, I would say," 24 two lines up, two lines up from Superintendent 25 Richardson's remark you had yourself first</p> <p style="text-align: center;">Page 227</p>
<p>1 you say led to all the problems subsequently: 2 "I have had a thought. If that's the case get 3 him to submit his version of events. Don't 4 come in for the interview. Give us your 5 version of events." 6 So you did not disagree with him on that, if 7 your only disagreement with him was about 8 bail. 9 A. Sorry, if I can answer that question 10 clearly. That I could recall, I certainly hadn't 11 gone to this and looked at this detail so ... 12 But I am happy to look at it now and give 13 you an answer to the question. 14 Q. But you were present at that meeting, you 15 did not raise objection to that. 16 A. I didn't raise an objection but I also said 17 about my place in that meeting and I did feel 18 very conscious about I felt as though I was 19 the person who had knowledge of the case 20 and not necessarily there for his inputs. 21 Q. I am not sure that is true either, because if 22 you go to B260, if the only disagreement 23 with him was about bail then presumably you 24 also did not disagree with him about the 25 possible interest in having him treated as a</p> <p style="text-align: center;">Page 226</p>	<p>1 spoken to say: 2 "That would be essential, I would say. I 3 would say so." 4 Then Mr Richardson intervenes and then you 5 intervene again. 6 A. Sorry, you have put a lot of extracts to me 7 there. 8 Q. I am sorry, yes, I am just trying to give 9 you the opportunity to - well, not the 10 opportunity, I am putting to you that in the 11 context of only one disagreement, not only 12 did you not disagree with this but you 13 appeared positively to be agreeing with him 14 on this. 15 A. Sorry, I can't remember my exact words 16 but certainly that was that I could recall. I 17 hadn't reviewed this and certainly not with 18 the forensic analysis that you are going 19 through now. I am happy to give comment 20 on each of those, if you would like, about 21 whether I agreed or not. 22 Q. I am not sure that the Chairman would 23 give me time. Could I just ask you this, 24 because I do not want the Chairman to say 25 that I have abused his indulgence. In answer</p> <p style="text-align: center;">Page 228</p>

57 (Pages 225 to 228)

<p>1 to my learned friend Mr Santos, you said that 2 you had eventually felt in October under 3 pressure. He asked you: "Did you feel under 4 pressure?" and you said: "Yes," and you 5 remitted back to this business that we are 6 discussing, that all subsequent problems 7 stemmed from the original decision to accept 8 his voluntary statement. Do you remember 9 saying that? 10 A. I do. 11 Q. My learned friend Mr Santos was trying 12 to give, I felt, trying to give you the 13 opportunity to see if you felt pressure was the 14 right word for that. Can I put it to you more 15 directly? Do you think in describing that as 16 feeling under pressure -- 17 MR SANTOS: Sorry, I do not want to 18 interrupt but my recollection is that he said 19 influence, not pressure. 20 SIR PETER CARUANA: Sorry? 21 MR SANTOS: My recollection is that the 22 witness said influence -- 23 SIR PETER CARUANA: Yes, influence, 24 same point, thank you very much. My point 25 applies to both of those, influence and</p> <p style="text-align: center;">Page 229</p>	<p>1 suggest, so the influence led to the 2 consequence and then what flowed from it 3 may be described as natural. 4 Q. But it is something that the RGP had 5 agreed to and helped to construct. 6 A. Agreed to, but influenced, I would 7 suggest, to consider that as an alternative 8 option. 9 Q. Yes. Very finally, what did you feel 10 when you discovered that your meeting had 11 been covertly recorded without your 12 knowledge? 13 A. Sorry, say the question again? 14 Q. What was your feeling when you 15 discovered that the meeting at which you had 16 been present and expressed views had been 17 covertly recorded without your knowledge? 18 A. I couldn't tell you what my feeling was. 19 If you're asking me what I think of it now, 20 I'm happy to answer, but I couldn't tell you 21 what I felt at the time. 22 Q. Please answer. 23 A. I think this question came up yesterday 24 about the code of ethics certainly. My view 25 on it is that ethics are not black and white,</p> <p style="text-align: center;">Page 231</p>
<p>1 pressure. Thank you. Do you not think that 2 that characterisation, influence, fails to 3 distinguish between that which the RGP 4 freely agreed to, indeed contributed - it was 5 Superintendent Richardson's idea - that you 6 are failing to distinguish between that which 7 is the natural consequence of something to 8 which you freely agreed which eventually 9 came back to haunt you, on the one hand, and 10 whether it is influence 11 by an external force on the other. Do you not 12 think it is more accurately described as the 13 unintended adverse - well, unintended but I 14 suspect foreseen by you, consequence of 15 something that we agreed to which with 16 retrospect I wish we had never agreed to -- 17 THE CHAIRMAN: I am afraid I have 18 completely lost the thread of that question. 19 SIR PETER CARUANA: Okay. Do you not 20 think it is better described as a natural 21 consequence of something you regret that 22 you had not done in the first place, rather 23 than external influence? 24 A. (Pause) It's a consequence but it's a 25 consequence of the initial influence, I would</p> <p style="text-align: center;">Page 230</p>	<p>1 there will always be a balance, which is why 2 you will end up with ethical dilemmas. 3 There will always be competing interests, 4 and to suggest, for example, that one of the 5 code of ethics is honesty, an expectation that 6 honesty in every situation I don't think is 7 realistic because there are competing 8 interests, for example not hurting someone's 9 feelings if you're going to be honest with 10 them. That's a very minor point. So I think 11 that it has to be considered by the person 12 doing that at the time in light of the 13 information they have when weighing up the 14 factors of who they are in the room with, the 15 consideration of respect for them as against 16 any other issues they have, whether they 17 believe there was improper practice, whether 18 it was necessary to record it for an accurate 19 record. Certainly in terms of an accurate 20 record it has provided a wealth of 21 information to this Inquiry that wouldn't 22 otherwise be available. So I would just make 23 that -- 24 Q. So in your view not necessarily unethical. 25 A. No, not necessarily, no.</p> <p style="text-align: center;">Page 232</p>

58 (Pages 229 to 232)

1 MR SANTOS: That concludes the public 2 session. 3 THE CHAIRMAN: Yes. I will withdraw 4 whilst we reconstitute ourselves. 5 MR SANTOS: Thank you, sir. 6 THE CHAIRMAN: We will not resume in 7 public again until Monday morning. Yes, 8 okay, thank you. 9 (The public hearing was adjourned until 10 10.00 am on Monday 15 April 2024) 11 (16.11) 12 <p style="text-align: center;">Page 233</p>	
---	--

--	--

A	168:13 203:23 204:2 210:1 216:1	110:12	20:4,5 29:9 30:19 31:7 32:1 32:3,7,8 34:5 37:11 39:18 40:24,25 42:14 45:11 48:23 50:2 51:1,3,4,13,14,23 55:21 57:9,13 59:15 62:21 64:8 64:20 65:7 66:20 66:24,25 97:19 98:4,7 131:15 135:25 168:25 188:5,6,6 203:22 206:1,4,10 216:18 217:15 218:10 219:6	138:10 184:21 185:1 199:9 Albert 156:18 allegation 119:22 120:2 152:14 174:9 allegations 21:2 28:13 33:11,24 44:20 50:18 alleged 10:12 27:15 46:12 81:25 153:4 170:2 221:9 allegedly 25:10 215:23 alleging 218:14 allowed 93:13 allowing 117:3 allows 186:14,18 alluded 7:17 121:25,25 allusion 6:9 alright 54:2 61:14 63:6,24 alter 13:5 187:24 alterations 116:20 118:5 altered 13:6 alternative 122:21 189:13 231:7 Alternatively 152:4 alternatives 160:14 amended 84:24 88:22 89:1 America 56:1 60:20 61:2 American 60:14 amicable 10:15,17 amount 32:4 130:1 171:7 175:21 193:13 amounted 221:11 amounts 148:4 amt 219:19 analogy 127:16 analyse 153:24 analysis 127:9
A/298 202:18 A1039 180:17 A1043 176:7 A1044 165:25 A1268 215:22 A1436 5:5 67:15 A1514 189:22 A300 3:16,21 A5 5:15 6:13 aback 10:7 ability 12:24 211:8 able 108:18 144:11 163:13 178:18 absence 90:11 absolutely 110:17 119:8 140:9 153:21 185:5 187:14 215:3 abuse 27:16 72:4,6 72:7,8 abused 228:25 AC 83:9 accept 27:11,24 28:2,9,11 36:21 37:22 40:6 47:24 49:7 52:10,18,20 72:14 204:3 211:15,16 229:7 accepted 52:21 94:19 117:10 183:17 204:6 accepts 40:5 access 11:3 21:7 85:15 94:12,13 116:19 117:23 132:22,22,23 157:6 161:7,8 170:11 178:12 184:22 186:5 215:1 accessing 24:25 155:25 157:12,14 161:1,3 210:19 210:23 accord 207:23 account 55:11 87:13 94:7,14 97:6 115:4 168:1	110:12 admissibility 198:14 admittedly 53:7 124:7 adopt 26:3 137:5 197:10 198:1 adopted 206:7 advance 78:20,23 advanced 181:8 adverse 230:13 advice 29:6,16,25 30:1 55:15 59:24 76:12,21 78:9 94:13 109:3 114:15 127:11 129:22 130:5 131:20 133:8,13 133:14,23 135:22 135:25 146:12 147:2,7,18,19 148:3 149:6 153:2 155:1,5 158:20,24 159:13 159:21 161:17,25 164:6 168:16 169:22 171:23 181:18 184:7,15 184:19,20,21 187:13 190:3,25 191:2,4 207:24 210:19 214:14 218:16,20 223:20 advise 55:16,25 148:8 155:13 196:16 208:2,4 advised 55:23 60:12 201:20 207:22 214:20 advisor 76:15 afraid 230:17 afternoon 6:25 111:8 AG 19:9 24:8 30:2 AG's 27:6 Agency 108:13 ago 54:15 62:9 agree 2:4 3:3,8 4:12,23 17:16	20:4,5 29:9 30:19 31:7 32:1 32:3,7,8 34:5 37:11 39:18 40:24,25 42:14 45:11 48:23 50:2 51:1,3,4,13,14,23 55:21 57:9,13 59:15 62:21 64:8 64:20 65:7 66:20 66:24,25 97:19 98:4,7 131:15 135:25 168:25 188:5,6,6 203:22 206:1,4,10 216:18 217:15 218:10 219:6 agreed 19:23 36:20 42:20 49:8 51:7 52:7,12 56:5,6 97:8 101:11,19 117:19 141:9 164:8,17 165:8 191:14 207:8 210:10 225:23 227:18 228:21 230:4,8 230:15,16 231:5 231:6 agreeing 49:2 50:10 211:6 228:13 agreement 36:24 51:20 63:1 64:21 66:18 125:13 128:9 129:25 140:1 163:15 172:1 203:25 204:17,19 agreements 37:16 192:24 agrees 199:12 ah 31:11 51:23 ahead 94:7 196:13 aired 216:14 AIS 105:21 106:1 106:19 107:6 al-- 153:7 albeit 122:14,17		

148:23 171:1 228:18 and/or 159:3 annexes 214:16 announce 87:4 answer 6:12 23:21 25:7,22 28:20 33:20 39:10,12 39:22 53:24 57:15 58:9 64:23 72:6,8 73:17 74:4,9,13,15 82:18 86:9,13 97:6 109:8 126:15 128:8 142:13 153:19 158:14,14,15 160:7 165:18 180:14 184:4,5 188:15 223:8 224:6,17 226:9 226:13 228:25 231:20,22 answered 12:15,19 12:23 19:6 24:6 46:22 164:19 answers 13:1 30:7 31:22 72:14 81:5 220:22 221:16 anticipated 193:24 anticipating 29:6 anybody 11:20 17:17 38:1 187:2 anyway 19:10 159:14 apart 86:1 apologetically 216:16 apologies 8:18 15:22 147:21 175:4 183:16 apologised 68:3 apologising 68:9 apparent 193:22 212:10 apparently 65:18 appeal' 34:4 appear 93:10 180:24	appeared 75:16 76:7 107:8 124:4 167:13,14 187:17 195:16,24 228:13 appears 21:4 29:20 130:25 161:10 162:24 181:10 185:2 appertaining 83:7 83:9 application 6:2 34:3 37:20 166:5 181:4,12,24 182:20,21 185:20 188:11 applications 180:25 182:4 applied 81:8 166:7 applies 229:25 apply 177:15 appointed 186:3 appointment 87:22 approach 136:25 137:5 191:17,19 213:10 approached 120:13 approaching 213:20 appropriate 22:11 90:2 120:17 121:19 122:18 128:6 130:5 132:20 133:4,21 133:24 136:1 145:18 161:25 165:19 168:4 177:15 196:2 227:2 appropriateness 134:19 approval 57:4 approve 181:1 approved 177:5 180:25 189:19 April 1:1,12 2:11 2:13 56:20 67:22 85:10 115:15	135:3 149:16 156:1,2,16 161:1 161:3,13 162:20 163:3 164:2,8 166:2,15 174:17 176:17 178:23 179:7,23 184:22 209:7 233:10 apt 213:23 aqui 30:25 area 69:1 118:8 218:3 areas 88:13 216:10 arguably 131:4 argue 171:6 175:20 argument 40:3,4 118:2 165:9 167:16 176:3 arguments 124:5,5 127:12 177:22 198:13 arisen 151:25 152:2 arises 93:23 184:12 arising 67:14 102:8 217:9 arose 138:3 arrange 220:24 arrangement 126:6 201:1 arrangements 110:25 arrest 30:3 34:19 34:20 70:20 140:14 arrested 35:5 81:22 104:18 arrests 79:1 80:10 82:16 104:9 171:8 175:22 arrival 11:2 170:9 189:4 arrive 209:13,14 209:22 arrived 33:6,10 69:7 97:15 101:3 132:12	arrives 33:3 articulated 3:20 128:17 201:25 219:24 asked 2:14 6:11 19:5 24:3 25:5 29:11,13,14 39:20 73:9 74:12 74:16 84:17,18 88:9 98:4 100:2 101:8 102:10 119:4 139:4 144:23 147:11 158:19 170:25 173:21 183:21 211:12 222:7 229:3 Asker 129:15 asking 3:2 51:24 63:16 64:19 76:5 85:21 88:7 90:15 144:16 149:21 205:2 231:19 aspects 115:25 assault 224:8,9,11 assertion 120:17 121:20 185:10 assertions 120:23 122:19 assess 83:15 116:18 128:24 assessment 40:18 85:5 136:16,18 137:16 138:3 142:9 206:2 assist 133:20 163:13 164:1,16 165:25 assistance 27:22 101:4 108:12 214:22 assisted 214:24 215:1 assists 171:17 associated 180:20 assume 202:24 Assuming 34:16 assurance 14:21 assure 14:9 71:18	72:10 assured 97:14 Astelon 18:10 77:2 78:13 astute 42:11 attached 63:14 85:12 142:16 attaching 16:19 63:11,19 attack 224:12 attacked 174:11 attempt 7:21 8:23 30:4 99:25 156:9 194:1 attempted 83:14 attend 19:24 29:11 29:13,14 88:7 170:18,24 175:17 attendance 14:19 15:9 21:13,15 22:19,20 23:5 28:8 71:11 95:11 192:22 attended 20:24 21:24 35:12 87:14 188:17 194:7 205:10 216:4 attending 180:11 204:15 attends 34:16 189:14 attention 54:10 67:19 attitudes 47:8 Attorney 1:12 2:5 2:8,13 3:14,18 4:15 5:5,25 6:17 9:1,25 10:4 11:19 17:24 19:1 19:14,19 20:18 21:8,14,24 22:10 22:20 23:2,25 24:12,22,25 25:2 26:21,23 27:1,23 28:15,17,21 29:11,25 30:11 30:21 31:14 33:17 35:5,10,22
---	---	--	--	---

37:13,17 39:24 40:19 43:17 45:2 45:5,16 46:8,12 46:13 47:4 48:9 52:5,11 53:4,18 55:1 57:10 62:17 64:6,9 66:13,15 68:4 86:16 88:25 89:16 91:17 92:9 105:14,17 115:8 115:11,16 163:1 163:16,20 166:19 167:12 222:15,23 224:15 Attorney- 194:8 196:9 197:11 205:12 207:13,17 Attorney-General 195:13,25 196:15 201:18 202:8,11 Attorney-Gener... 196:20 attract 128:2 attribute 64:16 audio 38:18 39:14 39:16,18 August 55:16 authorisation 117:24 authorised 118:4 authorities 60:15 authority 116:15 116:16,19 117:13 117:14 118:9 automatically 43:25 available 133:3 169:20 200:24 218:2 232:22 avoid 70:24 122:2 123:17 avoided 41:19 91:15 avoiding 41:22 Awaiting 135:4 aware 3:14,18 4:3 4:7 11:19 19:11 19:22,25 20:1 33:8 40:8 48:2	53:11,15,20,22 53:23,25 54:1 55:3 57:10,19 81:21 82:2,3 85:1 105:7 107:6 114:20 147:3,7 153:22 157:7 171:8 175:21 177:12,13 178:15 183:8 184:2 187:1 188:9 196:22 199:20 201:1,3 205:21 208:16 214:18 220:15 224:11 awareness 223:7 <hr/> B <hr/> b 27:13 61:18 159:19 B/237 196:5,9 B/241 198:4 B/244 198:3,15 B/259 199:11 B/269 194:6 B/309 205:23 B/320 204:22 B1/417 207:12 B118 28:25 B129 30:20 B131 33:2 B136 33:12 B141 34:12 B143 35:14 B153 36:6 B1681 106:5 B236 41:8 B239 42:18 225:16 225:19 B241 43:20 B242 46:11 B258 47:13,14 B260 49:11 226:22 B278 83:25 B3/134 192:23 B3/345 203:20 B3/432 208:23 B3/443 209:4 B3068 82:10 B3075 118:13	B3086 129:20 B3100 124:18 B3142 212:4 B3195 129:11 B3197 148:2 B3198 164:3 B3277 169:14 174:17 B3278 10:25 B3283 176:25 B3285 178:23 B3345 61:20 B3442 54:3 B3443 56:18 B3445 61:23,24 B3447 96:23 B3449 98:9 B3452 136:14 B3454 139:9 B3457 174:6 B3458 138:8 B346 15:15 B3474 70:13 B3475 13:2 14:5 B3492 102:18 B3497 188:20 B3610 85:8 B3612 150:23 B3695 99:14 B3716 131:14 B4408 19:16 B5392 88:12 B5737 105:12 back 12:7 16:5 19:13 38:11 39:19 60:9,19 61:8,15 69:24 74:20 79:7 81:11 82:21 84:12 106:7 109:22 142:13 149:15 157:10 160:4,13 160:17 169:6 171:16 173:8 174:4 175:16 182:18 189:12 192:13 193:16 195:24 206:25 211:3 229:5	230:9 backed 21:17 backfire 198:21 backing 135:19 bag 34:1 95:6 Baglietto 18:1,6,8 18:25 19:14,18 21:13 22:10,13 23:2 77:25 78:8 89:14 90:14 91:11 204:12 bail 219:16,23 225:11,21 226:8 226:23 227:8,18 balance 232:1 barber's 127:20 based 65:6 97:19 116:2 131:20 132:10 133:13 155:6 158:25 169:22 172:6 182:6,15,21 209:16,24 basis 117:6 125:1 126:16,25 138:1 140:8 142:17 145:15 153:20 162:23 164:6 169:24 171:14 172:25 181:23 183:24,25 184:1 188:3 bastante 30:25 BCA 83:11 bear 155:16 157:25 bed 31:13 beg 5:16 8:16 30:3 71:16 72:1 84:5 91:2 began 220:9 beginning 15:4,5 89:19 95:21 behalf 92:18 94:20 120:18 121:21 behaved 206:3 belief 81:12 111:19 112:4,13 171:14,15	believe 22:3 50:7 56:22 64:9 65:8 96:6 97:21 114:14 118:19,21 119:6 120:12 121:21 122:11,12 126:16 136:18 137:3 140:25 145:12,23 162:24 171:10,18 172:5 174:21 176:1 178:7 181:2,6,18 181:20 182:20 188:21 189:3 191:11 193:8 207:7 208:24 209:9,12,21 210:4 211:10 212:18,22 215:2 216:19 219:2 232:17 believed 68:6 210:20 believes 221:20 believing 188:3 belonged 1:23 124:7 beneficial 18:9 19:2 22:14 76:25 77:1,3 78:13 79:8 beneficiary 164:16 benefit 16:16 31:1 63:8 125:5 127:10 153:14 187:10 188:19 benefitted 159:21 187:12 bent 205:25 berated 57:25 berating 57:19 best 12:23 36:24 41:18 42:3 94:3 111:18 112:3,12 113:25 114:23 163:11 196:3 197:3 198:12 206:14 better 19:24 34:8
--	--	--	---	--

65:22 91:24 101:21,24 110:7 230:20 beyond 9:22 64:12 116:10 117:24 131:8 132:13 165:20 202:2 bit 35:16 36:18 41:15 104:1 105:12 195:15 198:16 bitten 82:6 black 66:8 231:25 Bland 117:7,8 118:1,3,6 119:25 120:22 124:3,7 124:10,14,24 125:18 126:6,19 127:4,11 128:13 130:1 132:5 172:2 183:4 Bland's 127:25 Blands 65:11 75:4 97:23 116:3 121:11 blank 83:8 blue 48:21 board 102:12 boardroom 189:5 189:14 191:13 boat's 106:25 body 14:7 174:7 188:19 body- 12:1 14:13 body-worn 70:14 70:15 141:8,10 141:15 Bonfante 78:2,5 98:10 borne 46:9 204:21 204:25 211:21 bottom 5:19 19:20 35:16,18 41:11 41:11 42:21 47:13 129:21 142:4 225:20 bound 81:14 118:3 187:18 box 14:6 35:15	36:7 41:13 42:23 199:18 boxes 34:13 35:15 50:23,23 breach 73:9 breaches 165:10 break 67:7 110:7 169:13 breaking 118:25 Brexit 84:13 brief 12:7 15:7 115:8 164:21 briefed 163:11 169:9 briefing 53:18 163:7,12 bring 170:25 brings 98:20 British 103:21 broke 139:21 Bronze 143:12,13 brought 152:18 153:23 213:11 bullet 67:20 bully 40:3 bullying 40:20 bump 23:15 bundle 111:11 189:24 business 13:8 128:3 131:1,2 148:12 149:20 172:17 194:4 229:5 businessman 76:17	141:15 143:11 154:17,22 165:5 189:11 called 69:24 78:14 193:6 205:4 calling 16:25 42:15 calls 189:12 camera 12:2 14:14 70:16,21 cameras 141:9,10 141:15,20,22 capable 172:16,19 176:19 capture 187:5 car 38:11,13,23 40:13 105:3 Carauna 155:19 career 12:6 careful 155:18 203:24 204:16 carefully 210:8 carried 59:6 carries 36:13 carry 6:20 30:18 31:11 48:13 139:17 200:10 carrying 48:3,15 141:11,24 199:13 199:21 200:12,16 Caruana 1:5,9 5:14 6:5 8:15 9:16 14:16 21:18 22:2,6 23:7,10,18 25:18,23 26:1 28:21 39:12 41:4 47:12 52:16 59:17 61:1 62:1 66:25 75:17 225:3,7,8 229:20 229:23 230:19 case 7:1 13:2 22:15 31:19,20 32:20 32:24 43:4 58:1 90:12 94:23 97:18 98:19 115:18 135:9,11 145:12 161:10 165:13 167:17	171:19 187:22 195:10 198:20 217:8 219:12,14 226:2,19 cases 127:12 133:22 cast-iron 110:17 catch 184:9 categorical 207:20 categorise 215:17 category 215:18 cause 206:25 caused 87:9 118:11 caution 42:25 43:6 43:25 44:4 45:14 45:18 47:2,3 51:21,25 66:3 75:22 80:24 81:3 87:23 88:14 89:17 91:4,14,15 92:1 97:8 159:11 159:23 165:18 195:22 196:14 198:6 210:12 216:13 223:24 cautious 153:12 192:19 ce 104:2,2 ceased 129:5 164:16 ceases 65:16 ceasing 52:25 cent 79:18 96:7 194:23 certain 12:4 69:9 72:25 73:2 96:7 102:13 117:17 118:10 119:5,8 134:22 145:18 148:14 166:4,17 167:1 203:16 certainly 29:7 32:17 33:23 66:12 80:11 83:23 89:9 114:2 117:18 118:23 119:18 120:10,13 120:19 122:16	124:9 126:21 131:9 133:17 135:17 136:23 137:4,13 143:18 143:25 148:23 157:7 162:12,17 163:10,23 167:10 167:22 168:11,12 172:25 173:3,10 177:8 178:1,15 178:18 186:10 187:9 192:15 193:10 195:7 198:12 200:24 202:3,23 203:2 206:4 212:17 214:3,25 219:6 226:10 228:16,17 231:24 232:19 chain 151:3 211:14 Chairman 1:3 8:13 21:12 23:4 23:9 25:16,24 32:18 39:10 41:2 57:23 59:15,18 64:18 65:1,22 67:6 74:21 75:21 100:20 102:4 109:12,18 110:6 110:10,14,20,24 111:3,5 173:10 222:2,9 225:5 228:22,24 230:17 233:3,6 challenge 27:12 33:14 36:25 49:2 49:3 199:9 challenged 166:11 challenges 28:14 28:19 chance 131:14 160:3 change 47:8 128:23,25 changed 32:11 42:5 99:9 123:11 149:17 changing 20:7
	C			
	C1764 107:15 C2623 121:3 C6245 99:14 Caine 6:18 8:2 68:1 82:3 83:6 156:21 Caine/Albert 156:4 call 11:24 13:3,15 15:20 77:11 98:15,20 111:2 123:22 126:9			

<p>chaps 41:14</p> <p>characterisation 40:7 46:7 62:25 64:21 66:22 230:2</p> <p>characterise 37:13 37:17</p> <p>charge 7:24 90:4 112:24 113:2 116:2 117:2 125:8 128:21,24 128:25 129:1 131:18 132:16 135:5 162:19 214:8,11,20 216:4</p> <p>charged 1:17 97:18 220:7</p> <p>charges 1:15,16,19 2:14,19 100:9 107:21,22,25 113:9 131:13,22 131:24 132:1,20 132:25 133:5,9 133:15,21,24 134:6,9,14,19,24 151:14,14,21,23 158:18,21,24 161:14 162:5,9 162:10,12,15 163:18 165:13</p> <p>charging 60:23 114:15 129:6 133:7,8,8,16 135:7 149:13,18 150:22,24 151:4 151:13 161:12,18 161:24 162:7 171:16,22 172:6 184:7,15,19,20 184:21 214:14 221:7 222:21 223:20</p> <p>chaser 179:14</p> <p>chasing 95:24 179:22 210:14</p> <p>chat 83:9,17</p> <p>chats 83:7,10</p> <p>check 111:14</p>	<p>122:15 142:4 211:4 215:3</p> <p>checked 106:24</p> <p>checking 119:10</p> <p>chest 217:10</p> <p>Chief 11:19 12:6 57:11 67:22 80:1 86:15 88:17 89:3 89:4 97:4 117:20 129:13 134:3 140:21 157:4,16 157:17 160:10 161:7 173:20 201:18 207:14,17 212:3,8,11,24 213:5,20 214:5,7 214:21 215:5,19 216:2 222:15,22 223:12,16</p> <p>chilling 57:23</p> <p>Chincotta 101:17 189:4,8,12 190:9 190:18 191:6</p> <p>chose 49:6 126:9</p> <p>chosen 48:5 199:23</p> <p>Chris 48:18,18 51:1 200:15</p> <p>Christian 41:14 48:19</p> <p>circulate 39:5</p> <p>circumstances 133:25 178:11</p> <p>cites 152:12</p> <p>civil 3:10 4:1 6:19 130:4</p> <p>clarify 23:11 128:7 183:14 217:18</p> <p>Clarke 86:3,4 107:18,19 108:4 134:5 180:22 181:15,16 182:21</p> <p>class 223:13</p> <p>classified 185:20</p> <p>clear 9:16 24:11 25:13 51:18 52:9 64:12 134:24 139:8 141:13 142:7 144:21</p>	<p>146:14 159:12 168:8 204:24 205:9 223:22</p> <p>clearly 15:8 59:5 123:7 125:19 145:13 157:14 198:24 217:9 223:15 226:10</p> <p>client 6:11 198:23</p> <p>clock 35:25</p> <p>closed 76:1 216:8 218:4</p> <p>closely 114:3</p> <p>closing 52:19</p> <p>clothes 71:10</p> <p>cloud 65:20</p> <p>CM 160:20 212:7 213:10</p> <p>co-- 68:6 151:11</p> <p>code 134:21 158:21 231:24 232:5</p> <p>Codes 191:20</p> <p>collaboratively 48:25</p> <p>collating 113:5</p> <p>colleague 154:5</p> <p>collide 84:10</p> <p>collision 41:16,23 105:18</p> <p>column 84:5 107:21</p> <p>combine 48:20</p> <p>combined 221:8</p> <p>come 12:7 29:7 42:25 43:5 44:11 50:13 54:19 57:12 61:1 73:11 87:5,23 91:16 108:17 109:22 116:4 122:3 124:10 130:9 133:7 154:2 162:7 173:8 184:20 193:6 215:9 217:20 224:13 226:4</p> <p>comes 31:10 43:25 55:25 116:16</p>	<p>142:13</p> <p>comfort 168:20</p> <p>comfortable 81:24</p> <p>comfortably 158:14</p> <p>coming 26:18 38:15 60:19 81:18 84:9 94:25 95:1 99:20 102:20</p> <p>command 143:10 143:14,20</p> <p>comment 15:3 37:6,7 43:2 71:22 102:11 103:3 148:21,22 148:24 156:20 157:21 167:7,24 206:19 208:6 228:19</p> <p>commentary 202:20</p> <p>commenting 203:5</p> <p>comments 158:10 208:21</p> <p>commercial 130:4</p> <p>Commission 19:15</p> <p>Commissioner 15:8 16:19,20 20:9 21:15,17,22 22:8,18 23:6 27:21 28:16,16 29:12 38:2,7,9 42:9,22 43:10 44:7 47:20 49:18 50:22 51:5,11 53:1 54:8,12,14 59:9,20 62:17 63:4,11,18,25 64:8 69:11 72:18 75:5,6 86:5 105:14,16,25 113:22 114:21 142:7,14 143:4 144:15 175:25 195:13 205:11,24 207:18</p> <p>Commissioner's 56:10 95:7</p>	<p>194:22</p> <p>commit 116:14</p> <p>committed 56:22 65:10 97:22 139:24 148:7,9 159:2,7 170:5 183:9 184:3 209:9 215:13</p> <p>common 130:11 216:10</p> <p>communal 216:8</p> <p>communicated 85:4</p> <p>communication 88:17,19</p> <p>communications 73:15 81:23 183:8 185:19</p> <p>community 76:10</p> <p>company 19:2</p> <p>competing 232:3,7</p> <p>compiling 113:8</p> <p>complain 67:25 68:12</p> <p>complainant 99:6 99:12</p> <p>complaining 202:9</p> <p>complaint 21:9 100:1 125:24</p> <p>complaints 125:20 220:16,19</p> <p>complete 66:6</p> <p>completely 42:1 67:5 94:11 230:18</p> <p>complex 133:21 135:11,14,15 142:24</p> <p>complied 145:21</p> <p>comply 146:4</p> <p>comprehensive 63:15 74:3 75:8 88:10 90:24</p> <p>compute 116:13</p> <p>computer 116:12 116:14,23 117:14 129:9 133:1 134:7 135:13 152:10 183:9,19</p>
--	--	--	---	--

<p>184:2,23 185:7 computers 132:7 conceal 81:16 187:25 concern 9:24 22:17,24 23:1 25:4,12 45:21 50:13 52:7 61:7 154:3 155:9,14 199:1 concerned 23:13 24:5 92:9 93:15 93:17 94:1,2 110:15 122:9 153:6,25 154:18 160:10 205:3 214:2 concerning 33:22 concerns 10:24 17:23 22:19 23:21 24:7 25:6 37:23,25 46:2,4 60:10 169:1 210:25 concessions 81:6 concluded 98:14 concludes 233:1 conclusion 56:17 57:7 108:18 139:15 152:25 203:9 209:3,13 209:15,15,18,22 conclusion/asser... 181:24 conclusions 146:3 conditions 94:11 conduct 14:11 49:5 50:19 71:20 72:12 93:22 159:9 197:12,13 203:17 conducted 17:10 201:14 conducting 172:17 conference 164:4 165:5 confession 217:4 confident 211:23 confidential</p>	<p>152:17 confidentially 154:14 confining 78:7 confirm 111:17,23 112:2,7,11 151:10 180:19 186:13 188:22 confirmation 98:12 207:7 confirmed 109:1 Confirming 30:11 confirms 204:13 conflict 18:17,21 confusion 146:15 connected 186:17 186:20 216:9 connection 172:14 174:3 connections 223:16 conscious 139:18 157:22 192:9 220:25 226:18 consent 20:25 21:2 88:1,4 96:14 99:25 101:20 102:1 144:8 191:21,23,23 consequence 230:7 230:14,21,24,25 231:2 consequences 58:19 75:11 consider 46:20 49:16 54:22 90:5 117:3 120:4,7 122:20,21 124:23 128:21 145:20 146:4 156:25 158:20 159:8,16 167:19 169:19 177:14 178:1,5 179:8,19 187:1 195:25 198:18 201:7,10 204:1,8 209:1 219:21 221:23 231:7 considerable</p>	<p>101:16 174:11 214:17 consideration 58:2 58:10 83:14 129:6,22 130:2 130:16 131:1 142:22 143:8 148:7 232:15 considerations 124:20 139:1,12 221:4 considered 48:16 56:13 90:2 107:22,25 122:25 126:22 144:2 148:12 149:20 152:6 165:16 167:15 172:23 176:17 177:17 178:1 187:2 195:12 200:13 202:5 213:13,15 218:20 221:5 232:11 considering 191:4 consistent 71:13 83:17 consists 185:18 conspiracy 22:15 56:23 65:11 97:23 116:1,23 117:2 124:24 125:8 128:21 129:10,17,25 130:2,10,17 135:12 138:21,25 139:6,11,21 157:2 159:3 164:10 165:7 169:24 172:10 209:10 221:9 Constable 83:4 construct 231:5 constructive 47:22 64:13 consult 50:25 109:17 143:1 145:3 consultation 73:13</p>	<p>consulted 101:17 146:7 180:24 consulting 17:7 contact 120:11 179:3 180:4 contain 65:9 97:16 97:22 185:24 contained 142:18 contemporaneous 40:17 content 44:14 48:16 57:6 58:5 67:5 81:17 140:16 contents 4:11 7:14 200:13 204:8 context 28:18 32:22 62:14 71:21 78:9 138:18 160:22 162:1 167:24 202:15 204:9 227:11 228:11 continue 56:15,21 117:4 122:24 123:13,15,18,25 209:8 continued 1:9 38:21 contract 117:8 123:17,22,23 124:25 125:2 126:10,11,17 127:3,13,15,23 128:8,10,12,19 130:1 160:11 172:3 183:4 contract/civil 165:10 contracted 108:10 108:11 155:23 contracts 160:4,13 160:21 contractual 126:5 126:22,23 127:21 contractually 118:3 contrary 40:20 59:2 61:11 171:5</p>	<p>contravention 157:15,18 contributed 227:20 230:4 contributions 64:14 controlled 94:10 convened 52:4 convenient 109:10 Convent 79:13 conversation 5:21 29:19 31:15 32:6 36:13 38:24 40:15 58:5 64:2 71:6,6 102:12 105:3,8 190:18 191:13 195:16 203:6 216:12 conversations 32:19 33:19 converting 55:8 convict 90:9 conviction 164:9 Cooper 127:19 cooperation 11:6 170:14 cooperative 43:24 122:6,7 coordinates 106:19 copied 142:2,8,11 142:12,15 151:11 180:23 copy 41:6 150:14 188:23 copying 69:17 85:9 cordial 191:14 Cornelio 48:8 117:22 118:16 119:22 120:2 152:16,23 153:2 153:5,22 155:22 155:25 156:2 157:5,9 160:2,9 162:13,16 183:10 184:3 200:1 217:20 218:4 Cornelio's 215:25</p>
--	--	---	--	--

corner 195:15	83:15 94:18	83:14	147:14,15 156:24	deface 187:24
correct 2:3 3:5	102:12 110:5,7	CTI 73:19	197:17 198:18	defence 85:14
7:18 8:19 11:10	132:9,16 142:19	curious 24:7 49:24	213:4	118:15,23 119:2
14:3,4 17:15	178:14 197:9	current 112:16	dealing 2:2 13:8	119:7,13 224:3
26:12 36:5 37:12	201:16 206:14	currently 112:17	169:20 192:10,13	defences 214:15
43:18,19 50:19	209:11 211:2,25	112:21	203:18	defend 166:12
50:20 52:2,17,21	212:10	cursor 17:11	dealings 53:3	208:12
53:13 56:15,16	court 21:3 34:3	custodian 20:19	deals 140:13	defendants 78:22
57:3 58:3,4	96:10,21 100:6,8	custody 56:9	185:12	82:2 99:17 104:9
69:19 74:5,8	176:4	Cyber 108:13	dealt 6:1,18 10:13	129:7 199:5
76:18 77:5 78:11	courtesy 192:21		67:18 68:15	201:5 212:18,23
79:9,24 80:14	203:4	D	78:14 171:5	213:4 214:9,16
85:23 87:19	covered 74:19	damage 87:9	192:20 199:7	219:16 225:22
88:21 90:18 91:5	covering 54:13	damning 60:20	206:20 213:13,16	227:16
91:8 93:25 97:12	76:23	data 73:9	213:18	defensible 168:19
101:7,10 105:23	covert 9:7	date 12:10 78:12	Dear 19:19	defining 187:2,4
107:14 112:25	covertly 231:11,17	91:6 95:18 104:8	December 160:7,9	definitely 72:19
113:1 114:9	Covid 177:10	114:13 117:16	decide 44:16 72:25	defraud 56:23
121:11 128:11	181:7	137:2,23 199:10	98:16 133:23	65:11 97:23
133:10,11 135:20	coz 36:18	dated 15:25	162:4	116:2,23 117:2
139:10,16 141:23	CPA 186:14	124:19 131:17	decided 51:9	125:8 129:10,17
149:12 150:5,25	created 18:23	David 130:24	deciding 133:20	129:25 130:2,10
170:17 172:4	129:18 182:6	day 7:10 10:18	decir 104:12	130:17 135:12
182:15 186:25	creating 118:25	11:13,13,21	decision 14:8 35:8	138:21,25 139:6
189:24 209:11,18	credible 13:20	13:23 17:18 34:8	50:24 51:8,13	139:11,21 157:2
219:4	credit 39:24	40:13 42:12	57:12,17,21 58:1	159:3 164:10
correctly 189:23	Crime 108:13	62:16 70:10,22	58:14,24 60:4	165:8 169:24
corrects 42:11	crimes 10:12	71:13 79:6 83:11	61:11,12,17 72:9	172:10 209:10
correspondence	criminal 20:23	83:11 87:20,25	114:24 115:4,6	defuse 33:22
92:17 93:6	21:6 37:19 50:19	88:2,3 90:14	116:5,7,9 133:4	degree 26:11
130:24 181:13	80:15 115:22	95:17 96:4,6,15	134:11,18 136:17	60:22 158:4
corrupt 5:19,23	148:4,8,9 149:7	97:2,4 105:18	136:19,21,22	192:16
9:20 10:9 68:1,7	159:4 216:6,11	109:25 113:5,5	137:1,5 144:6,10	delay 35:19 48:15
68:17	220:13	144:9,11 152:22	159:22 161:12	199:13 200:12
counsel 12:16,20	criticise 25:2	156:12 177:14	162:7 175:13	213:19,21 214:2
73:23 85:17,19	criticism 22:5	178:14 188:16,22	177:7,8,12	delaying 200:16
100:3 133:19	24:12 33:16	193:17 197:6	188:12 192:1	delays 210:13
190:24 224:20	92:19,24 93:4,10	199:3 200:22	201:12 211:15	deleted 82:4,9 83:9
counter- 176:2	cross 86:10,14,19	203:1 216:4	222:21 223:5	176:19
counter-argument	Cross-examinati...	218:12	229:7	deletion 83:16,21
175:23	1:8 222:12 225:6	daybook 76:23	decisions 53:12	Delhi 6:16 104:9
counter-argume...	cross-examined	107:16	114:22 143:21	112:24 114:22,25
176:10 177:19,21	100:16 102:7	days 33:25 42:20	216:18 218:11	115:9,12,21
couple 95:20	Crown 85:17,19	51:20 95:11,17	declared 19:1	122:23 123:24
120:10 220:22	133:19	95:18,20 96:18	declaring 17:7	128:15 129:7
222:5	crusade 218:19	132:2,3,9 202:7	declined 98:8	169:22 212:4
course 38:23 51:7	Cruz 222:2,10,11	DC 69:14 180:22	declines 98:18	214:9 217:9
57:3 58:17 59:6	222:12,13 225:2	deal 8:1 10:11 34:6	deemed 211:3	220:17 225:22
64:1 67:5,20	CS 3:22 5:19 83:13	52:19 62:20	deeply 31:13	227:16
		140:7 143:16		

delivered 37:3 93:1,5 156:21	determination 151:20	178:11 203:9 213:21	62:18 129:14 154:17 175:23 200:14 218:12	disruptive 141:6 distinguish 230:3 230:6
demonstrate 39:17 46:5 183:2	determined 204:7	digital 62:19 64:4 83:12 140:15	discussed 1:22 6:16 36:9 38:7 49:8 52:22 54:20 61:23,25 62:3,9 62:11 89:6,9 91:21 92:13 95:2 141:18 151:17 153:1 164:13 180:2 188:8 195:19,23 200:22 216:11	distracted 29:3 distress 155:8 division 112:22 doc-- 63:3 docket 113:8 dockets 216:6
demonstrated 161:5	developed 214:14	170:3 176:18 186:1,2 193:6	discusses 33:10	document 15:16 33:9 58:15 60:3 62:4 64:24 79:21 88:11 90:24 128:8 134:20 136:13,14 140:13 142:16,18 146:8 161:18 169:14 175:2,14,17 181:20 188:14
department 193:3 193:4	device 14:3 33:15 49:4 83:12 191:25	digo 104:2,2	discussing 8:25 37:2 49:11 54:17 81:24 190:20 194:21 229:6	documentation 120:25
departments 113:20	DeVencenzi 194:9	dilemma 42:24	discussion 26:6 36:11,22 42:1,18 45:15 46:3 127:6 130:8,14,15 131:10 141:2 179:15,24,25 189:8 193:12	documents 85:12 97:3,5 157:19 187:5 193:1 216:6 218:5 223:21
depends 29:20 143:24	devices 10:21 11:4 21:1 54:23,24 56:7,14 57:5 61:5 62:19 64:4 65:9 69:18 70:5 80:9,21 81:1,17 82:7,13,15 87:6,7 87:16 88:5 89:18 90:12 96:13,22 97:21 106:1 140:15,17 170:3 170:11,20 171:1 172:19 178:20 179:9 186:1,2,23 191:25 193:19 209:1,12	dilemmas 232:2	discussions 2:25 63:1 85:20 127:2 130:9 173:3 212:6	doing 3:2 11:21 24:14 25:3 42:25 84:13 123:3 124:15 128:3 144:4 168:20 200:3,4,5,7 224:23 232:12
deployed 141:7	DeVincenzi 4:3 5:6 162:24	diplomatic 141:6	dishonest 125:12 128:4 139:25 172:20,24	door 216:9 218:4
deprive 124:24 172:2	DeVincenzi's 4:9	direct 6:9	dishonestly 125:11 172:14,18	dotting 105:11
deprived 126:19	devised 10:22	directed 136:4,11	dishonesty 130:3 172:3,9,15	double 119:9 215:3
depute 78:16	dialogue 34:12 35:15,15 41:13 42:23 50:23,23	directly 160:20 201:6 229:15	dismissal 99:16	double-check 207:11
DEPUTY 109:24	diary 29:18	Director 27:23 30:22 43:22 48:18 52:6 76:13 76:22 85:1,21 195:14 224:10	dispute 1:23 116:7 117:15,25 122:3 122:9 125:2 128:20 130:4	doubly 155:18
describe 76:2 113:24 122:5 207:9 210:6 211:17,20	Differ 20:12	Director's 89:23 89:23	disputed 117:5 123:3,11,12 124:16 125:23 127:7	doubt 64:12 155:22 157:11
described 51:6,12 118:7,8 127:19 136:16 146:21 208:8 211:13 212:16 230:12,20 231:3	differed 20:15	disagree 3:9 126:3 131:15 226:6,24 227:17 228:12	disqualifies 18:12 21:7	download 70:6 downloaded 36:16 36:21
describes 3:23 104:6	Difference 196:8	disagreed 227:8	disqualify 24:24	downstairs 189:6
describing 229:15	different 18:17 26:3 27:7 66:1 94:11 113:19 128:25 137:7 138:10 140:8 152:5 184:12 198:19 199:8 203:18 211:18 212:2	disagreement 206:13 219:13 220:1,3 225:10 225:20 226:7,22 228:11		DPP 2:4,25 27:2 28:18 33:16,17 45:17 52:12
deserved 168:14	dialogue 34:12 35:15,15 41:13 42:23 50:23,23	discipline 3:11 4:1 6:1,19 8:3 68:15		
designed 73:17	diary 29:18	disciplinarily 67:18		
despite 155:24 160:6 210:13	differ 20:12	disciplinary 3:11 4:1 6:1,19 8:3 68:15		
destroy 81:16 171:11 187:24	differed 20:15	disclosable 44:1		
destruction 175:15	difference 196:8	disclosed 85:14		
detail 79:7 84:7 85:13 90:25 142:20 143:5,5,9 144:14,18 158:3 171:22 188:2,7 189:15 194:12 226:11	different 18:17 26:3 27:7 66:1 94:11 113:19 128:25 137:7 138:10 140:8 152:5 184:12 198:19 199:8 203:18 211:18 212:2	disclosing 45:24		
detailed 124:6 129:19 130:7	differently 34:25 192:5	disclosure 88:11 90:15 211:2		
Detective 83:4 134:4 216:21	difficult 96:12 119:19 125:23	discontinuance 99:18		

53:18 55:15 59:24 60:11 62:18 66:17 90:4 97:8 108:3 117:10 118:7 123:20 129:14,23 130:8,15 131:20 133:13,14 134:12 134:13,25 135:4 135:7,21 143:1 145:3,23,25 146:7,12,15 147:25 148:2,8 149:15 150:14 151:5,20 158:20 161:13,14 162:1 162:3 164:5,22 165:16,21 166:5 167:18,25 168:18 169:23 174:24 179:4 180:4 194:9 201:19 205:13 207:19,25 208:10,14 214:18 224:17 DPP's 30:1 60:22 159:13 169:6 188:10 draft 16:17,23 54:16 61:21 62:7 63:9 176:5 177:2 180:19 181:8,11 drafted 54:9,22 73:12,16 136:15 148:5 150:9,24 161:20 172:5 181:16,20 182:14 drafter 187:11 drafting 181:3,14 dragged 50:1 draw 203:9 drawn 67:19 146:3 203:5 224:1 dress 12:5 drove 40:14 dry 202:10,23 DS 180:22 due 181:7 210:13 duration 126:18	126:20 127:8 dwelt 33:7 <hr/> E <hr/> E 183:7 earlier 13:24 61:23 97:3 102:10 103:8 149:19 160:25 175:12 183:12,21 184:5 early 14:19 181:3 181:17 183:4 effect 15:9 42:7 52:8 55:8 57:23 99:5 102:15 116:13 125:9 128:10 140:4 163:10,24 210:12 effectively 44:24 51:23 54:7 55:22 123:10 132:13 147:13 151:16 184:19 eight 95:11 either 4:19,25 7:7 9:11 46:22 53:22 58:11 106:20 107:1,12 109:9 121:22 127:2 128:24 149:25 163:21 172:24 189:18 200:3 201:6 211:16 218:1 223:18 226:21 elaborate 198:2 223:10 elapsed 219:20 electronic 69:18 element 127:5 172:10 elements 125:13 129:1 135:14 137:8 140:1,2 178:3 221:8 elevated 215:14 elevator 191:8 eleven 88:16 elicit 201:14	email 15:24 16:17 19:18,21 54:13 54:18 62:7 63:3 63:4,10,12,17 66:16 83:4 85:9 106:5,5,7,10 142:5,8,11,16 144:24 147:1,22 151:3,10 169:15 176:25 178:22 179:13,18,20,23 180:1,23 181:13 203:21 204:12 219:25 emails 70:7 176:20 178:24 179:15,24 180:19 181:6 193:1 194:2 211:1,5 embarked 58:17 enable 35:4 enabling 227:13 encourage 32:17 encouraging 30:17 ended 26:16 223:24 enforced 96:18 144:8 engage 180:9 engaged 28:15,17 England 182:8 English 39:9,13 enquiries 120:21 121:1 enquiry 113:7 119:3,6 122:16 124:11 214:19 ensure 143:1 145:3 ensuring 134:23 entail 113:3 enter 184:23 entered 69:3 211:22 entire 93:14 entirely 14:9 52:7 72:9 128:25 198:11 entirety 155:4	219:13 entitled 125:21 128:9 192:2 entry 14:5 76:23 105:24 106:15 118:14,16 119:12 124:19 129:24 131:17 196:9 198:4 213:22 envisaged 224:9 era 53:1 erm 41:22 esoteric 25:12 especially 125:24 essence 51:17 essential 117:11 227:23 228:2 essentially 113:4,7 138:13 139:5,25 213:6 establish 116:17 established 136:23 137:6,9 197:5,7 197:22 199:5 200:20 206:15 establishing 215:1 estimate 101:25 ethical 232:2 ethics 231:24,25 232:5 evaluate 49:18 evening 202:6 event 6:6 7:20 8:22 13:23 159:6 events 40:12 43:5 43:8 75:11 82:13 87:12 101:1 211:14 226:3,5 eventually 43:11 43:11 54:7 64:15 93:12 225:25 229:2 230:8 everybody 60:3 192:11 everybody's 153:14 evidence 1:25 3:12 3:15 7:1 10:20 12:10 21:20,21	22:17,25 23:11 23:20 25:13 26:24 28:5 44:16 45:24 55:5,6,10 55:17,24 56:2,20 57:2,15 59:10,25 60:7,13,13 61:1 65:6,10,17 68:7 74:18 84:20 85:13 90:6,25 91:24 93:21 94:3 97:9,19,22 100:3 108:2,5,7,19,20 109:4 110:18 113:6,9 115:17 124:2 133:2 134:17 139:23 152:13,25 157:7 159:1 164:11 165:7 170:6,7 171:4,12 172:11 172:21,22 175:7 184:25 189:17 190:16 196:24 197:4 206:16,17 209:6 214:7,12 215:13 217:21 220:11,12 221:6 221:11 227:15 evidential 222:16 222:18,19 ex 188:11 ex-- 143:25 exact 103:11 104:8 104:17 228:15 exactly 13:25 35:14,14 38:6 41:24 48:24 52:3 55:21 56:12 61:6 68:11 95:3 197:23 209:19 examination 35:19 80:9 88:4 140:16 examine 89:18 96:21 examined 81:1 82:14 111:7 examining 80:22 example 58:17
--	---	--	---	--

109:25 110:1 143:25 144:7 185:18 232:4,8 exchange 48:25 100:23 103:4,18 104:1 105:19 142:1,3 202:13 207:13 exchanged 73:15 excluded 185:13 185:16 exclusively 162:14 execute 17:6,18 30:4 66:10 87:17 101:5 170:18 178:15 180:11 executed 14:2 66:2 66:7,11 180:10 executing 191:22 execution 11:6,15 66:23 144:1,11 170:13 202:24 exercise 87:2 109:1 exhibit 95:6 exhibits 138:7 exist 56:25 existed 1:23 Exocets 50:17 exonerated 87:13 expand 220:21 221:15 expanded 102:14 103:3 104:4 expect 53:17 expectation 162:3 186:10 232:5 expected 174:9 195:8 expecting 224:3 experience 174:13 191:18 expert 69:20 70:9 83:18 108:5,6,20 108:21 109:3 193:6 experts 108:14,19 expired 95:16 96:9 96:19 210:17	explain 43:15,16 63:7 125:5 153:3 171:15,17 175:10 183:25 195:9 196:21 197:13 198:25 216:25 218:15,25 219:5 220:9 221:4 explained 45:2 51:19 54:10 63:6 86:23 145:25 146:2 223:25 explaining 16:20 19:6 41:12 57:23 63:20 67:24 138:15 explains 189:8 explanation 31:10 44:18 92:1 183:22 187:19 explanations 97:6 explicit 157:5 explicitly 118:20 explore 44:21 65:3 88:13 196:3 exposed 224:20 express 9:24 37:25 45:21 49:24 63:17 169:6 208:11,14 218:18 221:10 expressed 27:8 46:2,3 68:10 149:19 166:6 168:7 216:23 219:18 231:16 expressing 24:14 167:18 198:8 219:8 expressly 92:13 147:2,7 extensive 98:13 168:10 extent 118:24 119:19 127:22 129:8 135:8 137:13 146:6 148:11 164:1 202:15 210:25	external 17:20 66:8 108:20 230:11,23 extract 47:6 192:25 227:14 extraction 69:17 extracts 228:6 extremely 90:23 <hr/> F <hr/> face 218:22 facilitation 197:14 197:18 fact 4:15 5:24 21:5 24:23 28:12 49:2 51:5 58:11 60:11 103:19 104:5 107:6 111:15 114:5 135:12 155:25 157:16 161:1 164:15 166:20 168:1,13 172:7 174:2 176:10 184:18 190:20 211:22 220:6 224:4,11 factor 61:10,12,16 factors 177:17,25 232:14 facts 123:11 128:23 199:2 fail 81:15 187:18 failing 230:6 fails 230:2 failures 156:5 fair 37:17 40:6 66:6 131:21 133:6 196:18 fairly 124:6 164:21 222:6 fairness 31:6,6 fall 143:23 185:1 falls 32:20 false 67:21 familiar 215:11 far 32:13 36:8 53:11,15,20,21 53:24 54:1 55:2 57:9 61:8 75:23 77:6 86:6 102:2	114:20 115:7 122:8 145:1,24 146:16 147:2,6 153:6 177:12,13 208:15 220:15 fatal 123:5,6 fault 107:10 faulty 106:20 107:1,9,12 favour 177:17 fear 59:13 61:6 feared 95:1 187:22 feature 6:24 featured 176:22 February 138:6 feel 42:3 92:24 93:4 121:19 137:25 153:14 158:13 171:21 197:18 202:22 203:12 207:1 211:20 226:17 229:3 231:9 feeling 47:25 229:16 231:14,18 feelings 232:9 feels 49:25 felt 58:21 126:5,10 127:9,14 139:23 151:21 195:10 196:1 199:3 203:14 213:3 217:10 218:21 219:19 220:11 224:20,25 226:18 229:2,12,13 231:21 field 107:17 134:4 156:12 fifth 85:11 185:22 fight 72:7 file 49:14 164:20 164:24 165:1,3 227:5 final 83:18 111:24 112:9 129:24 174:6 181:2 192:23 193:18 finally 96:1 97:2	109:5 165:16 188:9 231:9 financial 120:11 120:14,16 121:18 122:11 find 49:1,25 63:14 102:22 105:2 154:9 165:1 Fine 31:5 finish 110:16,18 finished 24:4 109:21 Finlayson 129:14 firearms 137:7 firm 24:10 174:2 204:20 219:22 firm's 22:13 first 5:10 6:13 7:3 11:3 13:17 14:6 20:2 28:3 36:14 45:1 73:7 76:12 79:1 80:10 82:16 89:7,11 99:15 100:7 102:25 111:10,12,13,15 116:1 131:16 154:4,6,21,21 170:10 171:20 174:8 179:1 180:16 194:13,18 194:25 196:10 199:18 200:25 209:19 210:9 213:4,22 220:8 227:25 230:22 firstly 67:13 145:15 five 34:12 42:2 48:25 62:12,13 173:7 flavour 84:11 flowed 231:2 flying 50:17 focus 16:9 28:7 focused 123:16 follow 39:15 100:18 193:21 197:5 206:14 211:14 219:3
--	---	--	--	---

follow-up 158:11 207:16	four 35:15 41:18 67:13 80:10	5:5,25 6:17 9:1 9:25 10:4,13	99:13 103:1 106:4 108:18	83:2 94:5,7 98:9 100:6 104:10
followed 9:4 119:6 121:1	fourth 73:5 79:4	11:20 17:25 19:1	109:3,7 110:16	106:7 107:14
following 55:10 80:9 91:7 98:13 113:6 139:14 145:10 148:25 173:16 206:17	frank 68:4,5,9	19:15 20:18 21:8	131:14 150:14	109:13 119:2
follows 16:22 142:15 203:7 227:17	free 48:6 90:10 137:25 199:24	21:24 22:10 23:2	155:7 161:22	124:18 129:24
footage 14:14 174:8 188:20	freedom 49:5	23:25 24:13,25	168:2,13 171:18	131:14 133:23
force 148:22 182:17 197:1 230:11	freely 230:4,8	25:3 26:22 27:23	173:9 175:11	134:1,20 135:2
forced 40:21 58:18 91:22	Friday 1:1 108:3	28:18,21 29:11	184:17 199:6	139:20 141:25
forensic 83:19 152:18 153:1,23 154:14 193:6 228:18	friend 57:16 75:18 81:5 155:19 223:6 229:1,11	30:11,21 31:14	204:14 214:21	148:25 149:12,15
forensically 82:14 194:2	friends 12:22	33:18 35:6,11,22	226:4,12 228:8	150:22 153:15,18
forensics 69:2 176:19	front 111:11	37:18 39:25	228:19,23 229:12 229:12	154:2,8 155:15
foreseen 230:14	frustrated 99:24	40:19 43:18 45:3	given 4:13 6:22,25	170:22 171:15,17
forever 65:21	full 126:15 148:5 150:9 161:22 195:11 207:10 218:2	45:5,16 46:8,12	33:24 34:21	171:20,21,22
forget 104:6 140:2	fully 171:17	46:13 47:4 48:9	35:11 49:21	172:21 174:4
forgotten 59:18	fundamental 24:16 31:24	52:5,11,16 53:4	56:24 57:14 58:7	177:7,8 180:15
form 101:20 159:10 184:24	further 12:19 35:16 49:10	53:19 55:1 57:10	58:7 61:4 62:21	180:16 183:13
formal 88:14	50:12 53:3 57:6	62:17 64:6,9	65:7 61:4 62:21	185:11 187:15,20
formally 176:16	60:16,18 61:3,5	66:13,15 68:4	75:3,5 81:17	188:1,16 189:15
format 138:10,11	65:3 74:6 100:16	86:16 88:25	82:11 87:12 88:1	191:6 196:5,6,13
former 129:7 214:8 225:22 227:16	102:7 104:1,5,10	91:17 105:15,17	102:11 116:19	198:3,15 199:11
formerly 180:22	112:6 142:22	115:8,11,17	117:21 127:11	203:20 204:22
forms 182:3 186:16,19	143:7 159:9,19	119:22 145:19	133:15 140:18	205:23 208:23
formulate 131:13 131:22,23,25	164:13 166:9	163:1,16,20	141:4 142:23	211:3,4 212:4
forward 49:1 90:13 126:4 131:6 201:9	196:3 198:3,16 206:25 220:20 227:19	166:19 167:12	144:4 153:2	213:8 215:22
found 26:8 42:13 86:10,13 97:16	G	194:9 195:5	155:11 157:4,16	218:5 220:11
	Gaggero 75:4,6 104:7,16 136:5,8 136:11 152:18 153:23	196:10 205:13	167:25 168:11,12	221:22,23 222:13 226:22
	Gaggero's 152:21	207:14,18 222:15 222:23 224:15	169:2 170:4	goes 6:20 33:5 54:7,8 172:9
	gain 155:3	General's 2:8 3:15 22:20 29:25 37:14 197:12	171:7 173:17	going 2:10 6:23 19:8 27:9 29:7
	Galliano 132:5 151:25	generally 119:21 143:19	175:20 178:12,16	30:23 31:23,25 32:17 33:13
	Gallianos 108:2	getting 92:17 109:12 150:23 157:9 160:4,17	186:5 187:22	34:15 36:9 43:7 43:7 47:23 48:10
	game 31:17	Gibbs 25:15 59:14 67:3,8,12 75:20 89:25 102:10 103:6 104:25 109:19 110:1,14 110:19,23 111:1	188:11 191:3	51:16 65:2 70:6 70:20 71:22 74:20 75:25
	Garcia 83:5	Gibraltar 84:19 130:12 133:16	218:22 219:19 220:10	81:10 84:10 92:6 94:15 100:6,12 100:14 102:20 104:13,14,17 109:9 117:18 119:9,21 123:5 127:16,20,25 132:4,14,16 150:17 152:21 156:12,22 158:3 169:11 173:7
	gather 195:8	give 15:18 35:2,9 41:6 43:8,23 49:3 51:20 78:8 80:15 84:10 88:8 91:24,25 94:6,9	220:10	
	general 1:13 2:6 2:14 3:19 4:15		gives 44:18 46:16 47:16 143:16	
			giving 91:18 158:3 170:8 175:8 184:10	
			go 2:10 6:23 11:17 13:2 15:15,17 16:4,5,13 17:5 19:17,19 30:24 33:8,12 36:18 39:25 41:8,10 43:1,1,16 46:17 49:11 50:2,15 55:3 61:4,18 65:4,4 71:16 72:5 74:20 81:11	

175:16 177:18 183:22 199:6 200:1 210:8 218:18 228:18 232:9 Gold 106:16 143:12,12 Goldwin 180:22 181:1 gonna 30:24 good 1:5,10 67:7 104:19 110:21 111:8 113:17 government 1:20 10:13 76:5 99:6 99:11 103:22 120:1,18 121:13 121:21 122:14 124:8,12 125:25 126:2,7 127:7,24 212:14 223:17 government's 99:25 121:17 122:5 Governor 103:22 GPS 106:2 Grail 31:4 grant 90:17 granted 11:3 84:23 170:11 granting 90:23 grateful 75:24 98:12 179:19 great 85:12 90:25 greater 82:25 188:7 Grech 99:2 grey 118:8 grievances 216:15 219:1,8 grounds 34:2 56:21,25 61:4 65:8 74:21 90:8 97:20 156:25 158:8 159:1,7 165:6 172:1 209:8 guarantee 110:17 guessing 92:13	103:17 guilt 60:21 guilty 24:18 217:3 <hr/> H <hr/> hacking 81:25 haircut 128:1 half 41:12 43:20 54:14 77:7 155:6 173:8 halfway 102:19,23 107:19 hand 14:9,21 17:8 20:6 41:5 66:9 71:19 72:10 84:2 84:4,4 87:16 101:13,15,19 138:12 172:18 191:24 216:5 230:9 handed 41:5,6 58:9 90:19 97:2 150:18 159:18 210:21 handing 170:20 handling 42:2 216:15 218:7 handwritten 188:21,23 happen 46:25 51:6 59:7 93:19 189:1 happened 7:9 11:9 11:17 52:3 64:16 66:22 87:25 93:17,19 95:3 98:1 178:19 225:25 happening 126:3 132:7 154:4,23 161:23 212:13,20 213:25 happens 37:8 49:17 66:12 happiness 49:24 227:9 happy 39:5 49:20 49:23 50:12 157:23 160:14 162:21 172:21 199:16 200:18,19	217:16 220:23 221:19 226:12 227:7 228:19 231:20 hard 131:13,21 harder 58:16 hardware 121:10 harm 24:22 Hassan 86:17 130:20 131:4 140:19 173:18 Hassan's 68:25 Hassans 11:25 14:19 15:9 18:8 20:24 33:3 37:4 51:22 68:19,21 69:3,20 70:9,22 77:3,7 79:23 80:2,7 87:2 92:18,20 93:6 95:11 100:25 102:12 141:12 174:2 188:17 193:4,8,11 194:3 201:19 204:20 207:6 223:9,11 223:13,18,19 224:3 Hassans' 27:12 174:11 Hassans's 34:7 36:25 haunt 230:9 hay 30:25 headed 106:15 heading 41:16 hear 39:2 heard 77:22,24 104:6,8 227:3 hearing 99:16 233:9 heart 14:10,22 71:19 72:11 Heine 31:9 169:21 held 56:15 65:9 97:21 114:16 187:21 help 67:2 155:8 162:1 212:20	help' 160:14 helped 231:5 helpful 49:11 64:13 196:11 helpfully 159:18 190:15 hierarchy 143:23 high 190:25 highest 189:20 190:4 highly 12:14 212:1 hinder 214:23 hindered 214:25 hindsight 167:21 HM 127:24 HMGOG 121:11 Hold 49:16 holds 31:12 home 11:23 17:12 17:13,14 87:7 94:12 191:16 homes 106:1 honest 29:4 44:19 218:8 232:9 honesty 232:5,6 hope 35:3 87:14 216:23 hoped 75:24 78:18 78:20 hopefully 111:13 hoping 34:20 64:25 91:3 hounded 25:10 hour 1:3 54:15 173:8 216:12 hours 101:20 102:1,2 150:6 house 189:7 191:10 216:5,10 218:1 huge 32:4 196:8 hundred 69:9 96:7 hung 202:9,22 hurting 232:8 Hyde 47:7 <hr/> I <hr/> Ian 29:4,4 216:21 idea 43:17 44:12 46:14 58:19 67:7	71:4 110:21 230:5 ideal 175:10 ideally 170:7 172:7 175:7 214:10 identification 131:19 identified 131:19 134:6 151:13 162:15 identify 15:18 103:2 132:10,18 132:20 133:2 151:18 illegality 174:10 illegible 216:5 217:24 IM 3:22 40:1 imagine 42:24 145:15 174:1 184:4 immediate 40:9 41:6 immediately 16:10 52:6,12 72:3 80:11 82:8,18 109:10 120:9 imminent 97:14 impact 132:24 158:6 165:13 194:3 198:20 210:18 211:7 impair 132:23 implement 144:5 implications 120:5 120:7 implicit 57:16 implied 126:11 128:7 importance 167:25 168:2,14 214:4 important 59:15 116:24 167:20 168:9 212:13 impossible 34:17 impression 190:12 195:5
--	--	--	---	---

improper 46:9 60:5 217:2 218:22 232:17	individual 127:19 155:4 164:14 167:15 181:16 191:22 213:7 215:12	initiated 31:16 45:1	162:10	interpret 203:1
improperly 36:16 37:18 218:15	individuals 114:17 119:5 195:11 223:17	initiative 45:1	intending 65:24	interpretation 148:20 154:24
impropriety 174:10	indulgence 228:25	innocence 65:15 65:20	intent 125:14 132:22 135:18 141:14 170:9 175:11 182:12	interrogate 21:1 106:1
in-house 133:19	inevitably 192:12	innocent 24:17	intention 108:23 134:11 161:13 169:19,23 186:9 195:21 219:9	interrupt 43:3 47:21 149:3 229:18
inadmissible 44:5 198:7	influence 158:8 209:25 210:3,6 211:13,16,21 229:19,22,23,25 230:2,10,23,25 231:1	input 139:4	intentionally 182:9	interrupted 138:14
inappropriate 20:10 21:22,23 22:3	influenced 58:2,11 58:13 136:7,11 209:13,14,21 231:6	inputs 226:20	intentions 171:3	intervene 228:5
inaudible 14:24 16:21 31:9 50:9 53:7 54:20 59:8 59:14 62:18 75:18 147:5 200:8	information 31:18 60:16,19 78:19 79:12 81:7,13 82:21,22,24 90:16,16,22 93:13,14 111:19 112:3,12 129:16 132:8 138:20 142:17 153:17,20 155:6,11 156:23 161:21 176:3,5 176:22 178:17 180:15,21 182:15 182:24 183:16,17 187:12 188:13,13 193:15 209:24 212:12,19,21 219:7 222:16,18 222:20,21,22 232:13,21	inquired 6:17	intently 155:20	intervenes 31:15 34:4 228:4
incident 106:13 107:6 133:2	insistence 88:24	inquiry 7:15 12:16 12:20,25 25:9 73:8,22,23,24 194:10 215:10 221:18 232:21	interest 16:21 18:18,21 20:19 77:3 90:10 125:16,22 126:1 126:8,12 128:6 140:3 186:24 215:8,16 226:25 227:10	intervening 86:17
include 77:22,25 88:14 172:7 181:25 185:8,15 188:13 221:14	inspector 44:4 49:21 72:23 129:13 134:4 180:21 181:1 216:2	Inquiry's 221:1	interested 16:8	intervention 47:14 47:23 66:8 75:25 78:21,24 191:3
included 45:3 77:14 151:2 153:10 176:3	instance 11:3 151:18 170:10	inspection 83:6	interests 31:6 33:7 47:18 52:18 125:10 232:3,8	interventions 32:2 32:5
including 16:19 98:11 113:9 129:15 189:9	instances 134:18	Inspector 44:4 49:21 72:23 129:13 134:4 180:21 181:1 216:2	interfered 2:6 11:12,20 14:10 14:21 71:20 72:11	interview 34:15 36:17 43:6 44:18 45:17,25 46:17 46:18,24,25 48:14,15,23 85:2 87:23 88:7,14 89:17 91:4,15 93:22 94:8,10,16 97:7 159:10,23 165:18 169:23 171:2 189:10 195:22 196:13,25 199:5,14 200:11 200:12,16 201:12 201:13 203:23 204:2,4,15 206:20 207:21 210:11 223:22,23 226:4
incomplete 62:24 64:20 66:21	instantly 21:7	instruction 213:16	interference 3:4 15:10 17:20 25:11 32:5 40:21 103:21	interviewed 45:12 45:14 66:3 81:3 84:15 164:20
increase 151:23	instinct 20:2	instructions 117:21 135:4,6 135:20,23 157:5 157:15	interferer 46:9,12	interviewing 80:23 169:17
increased 133:9 152:7	instinctive 40:17	instructed 161:7 180:6 213:12,14	interfering 37:18 45:5 47:4	interviews 203:17
incriminating 48:8 97:5,17 199:25	instructing/cont... 179:4	instructed 161:7 180:6 213:12,14	interfering 37:18 45:5 47:4	introduction 170:15
independence 45:6	instruction 213:16	instructing/cont... 179:4	interfering 37:18 45:5 47:4	investigate 7:23 211:8
independent 89:25 104:19 108:5,6 108:22 168:16 186:4 224:20	instructions 117:21 135:4,6 135:20,23 157:5 157:15	instructing/cont... 179:4	interfering 37:18 45:5 47:4	
indicate 81:25 153:25	intellectual 119:24 125:15	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	
indicated 61:2	intended 134:13 143:2 145:4,6,13 145:14 161:17,19	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	
indicates 152:25	information's 184:1	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	
indicating 30:18	informed 115:17 201:19	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	
indication 131:9	ingredient 117:12	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	
	initial 167:12 193:22 230:25	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	
	initially 19:23 69:5 116:2	intend 134:8 142:21 143:6 189:10	interfering 37:18 45:5 47:4	

investigating 22:15 74:24,25 75:12 113:12 114:6 136:3	183:1	judge 33:1 109:24	168:25 178:13	lawyer/client 131:4
investigation 2:7 14:12 15:4,11 18:3,14 20:24 21:6,11 24:11 25:11 37:19 45:7 48:4 49:6 57:6 60:17 65:25 71:21 72:12 80:19 81:23 83:1 83:13 98:13 113:5 114:7,19 115:18,23,25 119:12 122:8 123:9 124:17 126:13 129:19 130:6 136:2 138:18 141:7 142:24 171:9 175:22 176:12,14 187:6 199:22 206:21 212:11 215:6 216:16 218:7 219:18,22 220:2	involves 70:15 iPhone/iPad 57:2 irritated 27:19 isolating 181:7 issue 1:14,21 46:1 52:5 58:18 62:20 68:18 91:22 110:3 115:20 116:25 122:2,6 122:22 123:18 125:4,19 128:16 129:5,8,9 140:19 163:18 173:18 180:4 210:17 213:1,12,15 issued 95:19 issues 2:1 44:24 97:7 123:2 129:22 130:8 135:15 158:7 165:11 179:20 206:25 232:16 items 92:8 iteration 114:15 ITG 193:3 itinerary 129:18	judgements 20:12 20:14,15 judicial 166:11 July 118:14 jump 156:7 June 55:6 83:3,4 95:21 96:2 212:5 212:9 junior 190:24 195:10 jury 125:4 133:5 151:22 justice 83:15 140:21 173:20 justified 52:7 151:21	knowing 57:24 178:20 206:9 211:23 knowledge 111:19 112:3,12 114:23 115:3,10,13 136:4,10,12 140:7 147:23 152:10 153:4 180:8 183:18 184:23 185:7 222:14,17,25 223:2 226:19 231:12,17 known 19:10 23:24 86:3 113:17 137:12,13 176:11,13	lawyers 17:25 18:16 20:20 93:7 93:12 94:19 121:4 198:22 201:7 lay 90:16 le 104:2,2 le-- 150:7 lead 3:1 leading 17:8 64:7 64:8 141:2 leads 60:3 113:7 learn 194:18 205:16 learned 12:22 57:16 75:18 81:5 105:21 155:19 205:17,19,20 223:6 229:1,11 learning 84:6 leave 51:16 69:23 174:5 leaving 13:7,24 49:4 68:19 led 63:1 80:10 82:24 115:6 178:17 226:1 231:1 left 2:19 11:25 12:2 13:12 45:21 69:11,12 70:9 84:1,4,4 96:11,12 117:13 190:11 191:9 203:17 211:24 223:5 left-hand 107:21 legal 27:12,22 28:19 29:6,16 34:2 49:1,3 62:20 76:15 78:9 94:13 109:2 124:5 127:10,12 129:14,22 130:5 135:10,15,19 140:6 148:23 149:1 156:8 159:21 167:16
investigations 20:21 159:9	J	key 129:1,5 139:19 192:24 193:14,18 Keyword 130:23 kind 40:22 45:4 143:15,19 155:8 211:10 kitchen 216:8 218:3 knew 80:5 86:1 103:13 104:17 152:14 161:2 200:2,4 know 12:7 15:6 17:24 24:15 32:12 38:20 44:16 50:10,11 54:18 58:4 61:19 70:11 72:19,25 73:1,2,20 79:17 80:5 82:3 85:24 86:6,7,15,16,22 89:10,12 91:10 92:12 102:13,21 103:10,16 104:15 104:16,18,19 115:7,16 119:19 120:8 142:20 143:5 151:7 161:16 163:25	labels 211:16 lack 59:10 laid 90:22 100:9 land 84:18 large 74:11 largely 177:9 207:5 late 60:15 latest 121:22 launch 49:3 law 6:3 24:17 37:20 65:18 92:16,19 130:11 130:11 140:20 168:21 173:19 174:2 177:25 178:3 182:9 204:20 lawful 168:19 186:23 lawyer 5:11 24:2 135:18 178:6,25 179:2,5 180:6,9 lawyer's 25:7	
investigative 138:15 178:10	J 189:4,8,12			
investment 49:15	James 18:2 31:2 31:17 63:15 136:4,7 152:17 153:22 154:14 155:12 202:21			
invitation 98:18	January 131:12,17 134:2 151:24			
invite 91:25 221:23	Javier 190:20,23 Jekyll 47:7 JL 83:8 148:3,7 207:21			
invited 22:9 30:2	job 132:19,20 133:1,3			
involve 80:21	JOG 131:18			
involved 18:13 59:8 68:23 81:22 103:23 114:20,24 115:2,3 130:25 141:5 146:24 177:11 181:3 183:3	John 107:17 108:2 152:19			
involvement 61:3 76:14 80:20 83:1 98:21 130:16 148:4 181:17	Jonathan 132:4 journey 38:23 JP 83:7 140:19 173:18			

168:16,23 169:1 174:11 182:10 186:4 187:13 196:23 197:5 206:17 210:19 224:8,12 legality 21:9 33:14 57:1 208:11,12 208:15,20 218:17 legally 92:14 131:2 143:2 145:4 179:9 182:1 185:21,24,25 legislation 182:18 197:2 length 150:7 lent 49:14 Lesley 156:8 let's 48:20 110:10 letter 33:2,3,9,11 33:20 34:7 36:10 36:10 37:2 51:21 52:12,23 97:11 121:3,7,8 156:8 204:21,25 205:1 207:5 letters 50:17 224:22 level 22:5 33:16 126:11 143:22 155:13 189:20 190:24 224:24 level' 190:4 level.' 190:25 levelling 24:12 Levey 202:21 Levy 11:22 14:2,8 16:2,19,21 17:6 17:18,19 18:1,2,6 20:25 23:3 26:4 28:5 31:2,10 35:2 44:10 45:11 54:6,23 55:5,18 56:13,22,25 57:5 60:20 61:2 62:13 63:11,20 65:10 66:3,9 71:7 72:3 72:14,23 74:21 76:11 77:6 78:10	79:18 80:16,18 81:16,21 82:25 85:3 88:19 89:14 91:1,11,23 92:18 93:20 94:6,19 95:13,22 97:8,22 98:3,14,16,17 101:4,8 102:11 102:19 103:9,12 103:24 130:20 131:3,10 137:24 138:1,16 140:10 140:14 145:14 147:4,9,20 148:9 152:11,14,16,23 153:1 154:6,22 155:22 156:3,17 157:1,6,9,11 159:2,7 160:2,5 160:12 161:2,6 162:11,18 164:17 164:23 165:16,22 169:17,21,23 170:8,24 171:3 171:11 172:13 173:4 175:8,11 176:11,13 178:5 179:21 183:2 184:1 189:12,14 189:17,21 190:6 190:12 191:4,11 192:5 195:21 198:19 199:7,14 200:17 202:9,12 204:13,15 206:3 206:7,18 209:2,9 210:10 211:2 213:5,13,15,18 220:6 221:5,12 223:11,12 Levy's 10:21 18:2 23:24 24:1,9 28:8 30:3 31:17 56:7 62:19 63:15 64:4 65:15 87:6 92:10 93:6,12 96:13 97:1 98:20 130:16 153:5 182:25 186:23	189:7 191:16 227:12 Lewis 18:6,7 19:18 lies 227:24 lieu 203:23 204:3 lift 190:19 191:6 191:12 light 53:7 56:18 117:4 146:20 149:17 209:5,17 221:5,9 232:12 likewise 117:25 limited 18:11 19:9 88:15 208:16 line 23:20 29:20 30:7 32:12,17 104:4 106:14,18 114:2 146:17,23 175:6,18 185:22 196:10 199:17 214:19 lines 5:18 35:17 41:12,17,18 68:13 71:18 104:10 113:6 119:3,6 160:18 190:1 227:24 linking 3:10 lips 49:25 list 6:23 73:24 74:2 74:3,7 138:4,9,9 158:18 listen 87:11 110:21 listened 45:15 listening 39:1 92:2 little 47:6 195:15 live 37:18 65:19,20 Llamas 7:21 9:19 29:3 31:19,20,21 32:20,24 33:6 34:13 36:4,6,14 38:10 39:24 40:12 41:11 43:9 43:13 44:8 46:4 46:20 47:2 48:11 48:19 49:16 50:15 86:6,12 202:23 203:3 207:19	Llamas' 202:19 lo 104:12 local 179:5 180:6 182:18 located 128:10 log 82:13 106:6 119:11 129:20 131:17 logically 40:1 logs 83:17 LOL 97:11 long 9:12 22:6 35:15 41:13 54:25 69:8 70:8 74:2 95:15 101:15,25 102:4 122:14 210:14 longer 14:22 52:1 56:21,25 65:7 94:22 97:20 117:11,22,23 127:1 157:6 161:6 193:23 209:7 longing 109:20 look 3:20 33:15 43:11 47:15 106:5 107:4,5 111:10 118:14 124:16 129:20 132:2 134:23 135:10 137:20 152:8,19 153:7 155:21 181:12 188:20 202:20 226:12 227:19 looked 106:6 133:1 138:17 155:10 174:18 182:20 226:11 looking 42:23 49:4 83:3 96:24 123:4 155:20 162:18 173:14 183:12,20 187:8 193:9 looks 179:22 Lord 109:19 loss 171:4 178:17 lost 16:22 230:18	lost/destruction 170:6 lot 44:20 46:2,3 102:20,21 132:8 132:14 135:13 200:6 218:14 224:21 228:6 lots 18:16 73:15 137:7 lunch 110:7 lurking 61:7 <hr/> M <hr/> magistrate 81:13 magistrates' 21:3 176:4 main 77:6 78:21 132:25 maintain 41:23 155:24 maintenance 117:8 123:17,23 124:25 127:3,6 128:9,12,19 172:2 major 1:21 41:16 making 21:8 33:25 34:2 60:4 114:21 114:24 115:4 125:20 137:1,6 182:4 192:19 214:4 man 6:11 9:20 10:9 68:16 managed 82:5 management 29:18 114:2 196:12 manifest 10:1 192:17 manifestly 66:21 manipulated 203:25 204:17 manipulating 204:18,19 manner 203:16 210:9 March 105:18 106:8 115:14 145:8,9 147:24
--	---	---	--	--

149:9,11 160:2 215:22,24 216:3 Mark 16:24 62:6 63:13 72:20,23 84:9 85:19 108:3 111:4,6 216:2,7 216:16 217:2,9 Mark's 63:14 marked 111:11 matches 44:15 material 17:9 27:10 36:16,20 55:11 69:18 80:22 92:14 97:15 178:25 179:3,9 180:7 181:25 182:1,10 182:12 185:13,13 185:15,16,18,21 185:23,24 186:1 186:5,7,9,15,16 186:17,19,20,24 187:16,21,23,25 214:17 221:14 matter 7:2 9:8 14:17 28:10 30:1 30:2 37:8 48:4 66:19,19 73:8 98:15 99:7,12 146:17 147:13 166:9 167:20 199:22 202:22 203:3,6,19 208:9 matters 1:24 2:7 19:3 67:13 129:15 216:25 McGrail 5:12 7:4 7:7 11:25 12:4 15:18,19,20 19:23 28:17 30:7 31:5 34:4 36:11 37:8 38:19 40:10 57:19,24 58:11 58:22 68:2 69:25 70:23 84:8,16 89:8 91:1,1 96:4 105:9 113:22 114:11 115:7 136:10 142:2,9	143:3 145:5 146:5 147:16 151:2,6 163:2,16 169:4,6,9 174:20 174:21 175:25 177:11 194:7,14 196:19 205:14 216:21 McGrail's 5:11 6:14 7:11 9:7 20:2,7 25:7,9 38:25 52:25 66:17 147:1,7,18 147:18 195:3 206:2 220:17 mealy-mouthed 62:23 mean 1:16,18 8:11 9:15 30:13,15,15 30:16 31:17,19 31:20,22 35:18 73:21 89:24 109:24 124:17 140:5 141:13 143:4,9 145:6,18 173:22 177:4 179:7 197:23 202:16 203:2 220:7 225:15,22 meaning 9:13 30:16 43:1 means 3:21 28:4 128:4,5 141:6 143:19 184:13 meant 15:22 26:13 64:18 73:1 93:20 128:19 143:18 147:16 172:16 206:18 210:15 measure 46:19 92:5 168:5 mechanism 43:14 43:15 178:4 meet 18:5 19:14 20:19 160:20 meeting 1:12 2:9 3:24 4:3 5:3,9 7:21 8:4,7,8,11 8:13,17 9:6,17	10:15,17 15:5 19:12,13,24 21:25 22:9,21 23:1 24:8,13 28:3,22,23 29:1,5 29:12,13,15 30:3 32:13 33:4,5,10 36:11,22 37:1,3,5 37:13,24 38:4,5,8 38:8,19 41:8 42:14,15,16,21 45:10 47:9 51:18 52:4,22 53:4 68:3 79:11,13,17 79:20 80:3,4 83:22 89:7 91:9 91:10 93:23 95:10 102:17 103:9,14 105:4 105:13,16 107:17 114:14 129:12,18 131:7 134:2 145:22,24 147:12 147:25 148:2,10 148:19 149:9,16 149:18 150:5,8 150:15,20 162:20 162:25 163:3,7 163:14,25 164:3 164:4 166:2,15 166:18,22,25 167:3,12 169:4 194:6,7,10,14,19 195:6 197:12 201:17 202:7 203:13,15,18 204:23 205:5,8 205:11,14,18 207:1,3,4,8,16 215:21 216:1,14 216:25 217:12,15 224:14 226:14,17 231:10,15 meetings 2:10 6:16 9:3,12 26:16 27:11,25 28:12 46:7 53:6 83:24 89:10 92:16,20 92:21 93:2	110:22 115:12,15 149:10 211:19 members 76:10 197:1 memory 79:9 139:1 140:6 180:13 men 48:25 Mena 77:22 80:4 156:5,18 mention 4:19 5:7,7 5:9,12 6:11 66:16,16,17 189:16 mentioned 5:16,17 8:20 9:11,22 55:19 64:5 83:23 114:4 147:24 157:3 163:19 mentioning 3:22 13:18 merely 76:15 merit 160:19 167:21 merited 167:20 merits 204:7 message 152:15 160:1 179:6 202:8,20 207:15 messages 76:3 80:12,15 82:4 153:4 160:15 161:4,8 176:20 183:11,20 184:16 messenger 37:4 met 2:13 17:25 23:25,25 38:10 41:25 42:6 62:18 73:14 89:13 108:3 129:13 193:7 216:7 methods 187:16 Michael 39:24 mid-level 143:19 midday 69:10 middle 33:2,5,12 37:3 46:15 49:13 50:24 84:1 227:3 midst 20:23	Midtown 192:22 mill 190:22 mind 2:12 3:8 9:14 18:15,23 19:5,7 19:11 20:7 25:5 38:17 42:4 54:21 59:3,4,5 60:9,21 60:22 61:8,15 160:15 192:13,15 219:2 minds 25:6 148:17 mine 198:2 Minister 11:19 12:6 57:11 80:1 86:15 88:18 89:3 89:5 117:20 157:4,16,17 160:10 161:7 201:18 207:14,17 212:9,11,24 213:6,20 214:5,7 214:21 215:5,19 222:15,23 223:13 223:16 Minister's 212:3 Ministers 100:4 minor 232:10 minute 139:21 203:7 222:5,10 223:4 minutes 62:9 76:1 173:7 225:4 mirror 184:14 misconduct 164:11 misfeasance 27:17 misleading 60:2 181:11 misled 16:11 200:4 misquoted 54:3 missed 60:25 misspoken 54:5 mistaken 132:3 misunderstanding 70:24 misuse 116:12,14 116:24 117:14 129:9 134:7 135:13 152:10
--	---	---	---	---

183:9,19 184:2 184:24 185:7 mixed 68:13 76:7 Mm-hm 101:2 106:9,17 Mm-hmm 53:2 62:10 mobile 140:17 210:20,21,24 model 136:18,19 136:21,22 137:10 161:12 175:14 222:21 223:6 224:2 modern 176:18 module 156:15 modules 119:24 121:10 Mole 12:3 216:4 216:10 218:1 moment 39:13 122:4 150:4 151:12 154:3 173:6 204:4 momentarily 29:2 Monday 31:9 34:15 44:11,12 44:13 46:17 48:12,22 91:7 200:9 233:7,10 money 49:14 month 97:3 120:9 121:22,23 126:24 126:24 128:1,1 months 80:12 120:10 176:12 216:3 mooted 200:23 morning 1:5,10,11 8:25 48:12 67:14 68:18,24 70:12 73:6 106:13 107:5 152:17 200:9 233:7 Moshe 18:1,6 23:3 24:1 motivated 59:12 move 13:2 25:14 25:19 28:25	30:20 51:18 174:16 193:16 194:5 212:2 215:21 moved 26:9,11,13 26:20 189:13 moving 10:18 26:8 26:9,13 41:7 52:24 131:6 155:16 205:7 <hr/> N <hr/> N 131:1 names 77:21,24 narrowly 187:5 national 108:12 132:24 136:17,19 136:21,22 156:6 156:13,19 160:4 161:12 175:13 222:20 223:5 natural 230:7,20 231:3 nature 62:25 142:24 189:21 190:5,8 198:10 217:12 NCA 108:12,21 NCIS 115:22 116:4 117:6 119:23 121:9 124:25 125:7 130:1 NDM 85:5 136:16 137:5,15,23,25 138:3 142:9 145:10,11,25 146:1,7 150:11 150:14,17 161:22 162:2 171:16,18 171:20 173:15 necessarily 30:13 30:18 104:24 126:21 127:8 141:16 146:20 216:18 218:10 226:20 232:24,25 necessary 3:17 87:17 128:14 145:2 159:9,22	188:4 207:22 211:4 221:20 232:18 necessity 140:14 need 31:12 44:17 44:21,22 46:24 79:22 80:6 83:15 97:7 119:2 128:20 129:1 132:15 164:12 165:14 171:21 178:1 183:23 189:15 198:18 202:19 213:10 215:25 221:22 needed 116:17 122:22 123:7 125:10,17 135:15 164:19 165:12,18 211:24 213:7 217:24 needs 45:12 128:24 nefarious 17:19 negotiation 197:15 197:19 neither 18:2 57:10 never 3:8 19:11 38:17 54:20 114:1,3 163:10 178:12,18 220:7 230:16 new 12:3 33:10 184:11,18 216:4 216:10 217:25 ninth 88:16 non- 196:5 non-execution 11:16 non-independent 108:2 non-lawyers 125:5 non-privileged 80:22 non-redacted 153:20 non-Spanish 31:1 noon 111:9 normal 191:17,19	normally 197:10 206:1,5 211:8 North 18:10 49:14 77:4,8 79:18 117:22 128:2 155:23 160:11 164:17 176:15 note 5:2,9,20 75:21 105:13,24 114:12 119:11 129:19 131:3 133:12 134:5 148:1,13 149:22 150:9 152:18 156:18 164:20,21 164:24 165:1,3 165:20 176:18 193:17 196:7 212:5 notes 5:17 6:5 119:9 131:8 149:25 163:9 167:4 188:21,23 192:22 noteworthy 4:22 notice 81:17 88:8 88:22 170:8 175:8,11 187:22 notify 171:2 noting 219:9 Notwithstanding 48:5 199:23 November 98:11 121:24 124:19 NSCIS 82:1 152:15 153:24 155:24 158:6 172:2,14 176:15 183:4 number 1:16 2:18 2:18 54:4 79:13 113:18,19 114:17 119:11 121:1 127:12 133:9 134:18 151:21 152:1 153:9 157:8,17,18 163:20,21 172:11 212:7 213:11	215:9 217:23 225:17 numbers 163:22 165:15 <hr/> O <hr/> o'clock 48:22 110:8,9 objection 21:12,14 23:5 222:8 226:15,16 objective 144:4 objectives 142:21 143:7 obligations 134:22 134:25 obliging 57:12 observation 25:17 obtain 28:5 94:3 99:25 108:6,9 125:16 133:14 140:3 146:13 161:24 191:21 193:14 194:1 196:23 197:4 206:16 210:14 217:4 219:6 obtained 20:25 54:23 96:13,15 118:23 147:4,9 147:20 159:15 186:15,16 209:2 212:22 214:7 obtaining 10:20 187:16 obvious 217:6 obviously 14:6 18:15 63:8 70:15 86:5 115:5 124:11 occasion 52:20 169:10 occasions 213:11 occurred 174:14 201:11 occurrence 217:1 occurs 184:22 OCPL 113:10 135:1 151:19 October 15:25
--	--	---	---	---

54:25 56:12	136:3,23,24	93:5 142:23	originally 68:20	140:13 141:3
66:11 117:21	137:9 182:4,7,9	143:14 144:2,6	160:23	142:5 152:9
120:12 152:16	189:6 196:22	144:10 146:17,21	Oton 69:14	158:18 169:18
153:8 157:4,12	offices 69:4 100:25	147:13 166:8	outcome 66:2	171:24,25 173:16
208:25 213:8	official 129:16	192:1 208:8	outcomes 178:9	179:14 187:3,20
215:2 229:2	oh 22:2 30:15	operationally	output 6:24	189:25 204:13
odd 4:13 217:1	39:19,23 59:9	89:25	outright 119:25	207:15 209:4
offence 56:22 57:1	101:16 102:24	operative 186:8	outside 92:16,20	227:3,20
57:2 64:6,10	147:17,21 185:5	operator 72:2	168:21	pages 216:5
65:11 80:23	187:19	opinion 2:8 32:18	outstanding	217:23
97:23 116:14	OIC 186:5 187:24	217:7 219:11,13	214:19	pain 30:24,24
117:1,12 129:10	okay 4:12 7:20	opportune 173:6	outwardly 7:3	paper 163:21,22
130:10,11 133:1	10:18 12:25	opportunity 15:18	overcome 135:16	papers 71:2
139:6,22,24,24	13:23 16:22	94:8 103:2 106:4	195:20	paragraph 3:21
148:5,8,10 149:7	25:18 27:9 29:22	109:8 184:11,17	overload 134:24	5:3 6:14 11:1
151:18 157:1	32:14,25 34:11	199:7 211:3	oversees 143:20	14:1 16:4,9,12
159:3,8 170:4	38:15 41:1,14	228:9,10 229:13	overview 171:18	17:5 19:20 33:22
209:9 215:14	46:20,22 47:13	opposed 1:17	owing 164:15	33:23 34:7 35:23
220:13 221:12	49:20 50:11,12	47:19 167:15	owned 79:18	36:15 39:4 45:9
offences 116:12,22	51:16 52:21	188:4 191:24	owner 19:2 22:14	45:20 51:4 54:21
117:1,14 129:9	54:19,20 61:16	210:11	54:25 116:3,16	55:4,14,19,22
131:19 132:11,12	62:11 64:25 67:1	oppressive 28:4	116:18 125:18	56:18,24 58:14
132:14,17,21	105:2 153:7	option 44:8,9	ownership 1:20,22	62:12,13,15
133:18 135:5	156:10 173:25	123:22,23 179:5	2:20 18:9,10	63:24 65:14 66:6
152:11 153:9	223:3 230:19	200:25 231:8	76:25 77:1 78:13	66:20 85:11
159:4 170:2	233:8	options 10:23,24	79:8 115:20,21	104:23 124:22
183:9,19 184:2	omit 1:19	48:20 123:1,4	115:24 116:7,11	137:22 145:2
184:24 185:8	omitted 2:19	169:11,17,20	116:25 117:5,9	158:19 160:1,8
offer 34:7 122:17	on-site 69:21	174:4,16 175:3,4	120:15,18,24	166:1 169:18,25
offered 11:7 94:18	once 82:6 86:9	177:5,9 195:19	121:20 122:2,3,9	170:22 173:16
169:22 170:14	94:18 97:15	195:23 196:1	122:19,22 123:3	174:6 175:5,16
201:2	116:6,9 193:19	200:24	123:11,12,18	176:8,16 181:21
offering 224:15	204:7 213:13,15	oral 7:1	124:7,15 125:3	182:13,24 185:6
office 11:22 12:1	ongoing 130:6	order 25:8 50:4	128:16 129:5	185:11,14 187:3
13:24 17:11,13	218:23	54:22 61:5 96:20	163:18 165:12	189:25 192:23
17:14 25:11	Op 6:16 217:9	96:21,21 109:11	owns 125:17	193:18 202:18
27:16,17 38:12	open 9:14 61:5	116:13,14 117:7		209:4 215:24
58:12 87:7,8	opened 42:16	137:7 146:18	P	223:7 224:1
114:16 190:2	opening 65:13	148:25 149:4	page 15:17 19:17	paragraphs 65:3,6
191:16 194:23	97:25	161:21 166:7,10	23:20 33:12	152:12 155:21
officer 69:7,15,16	operation 45:6	166:21 167:9	34:11 39:15 41:3	180:17 183:2
70:9 78:14	68:24 112:24	169:7 170:5	43:21 46:15 47:8	184:6,12 185:9
106:23 112:24	114:22,24 115:8	178:8 188:5,10	47:9 49:13 50:13	209:16,17,23
113:2,12 114:6	115:11,21 122:23	192:25 193:13	83:2 84:1 85:8	parameters
195:11	123:24 128:15	196:23 206:16	89:4 98:10	143:15,16
officers 57:25	129:7 143:17	208:8 209:1	102:19 106:8,15	pardon 5:16 8:16
68:20,23,25 69:3	169:21 212:4	ordered 99:18	107:15 111:25	30:4 71:17 72:1
69:12 92:17,19	214:8 220:17	orders 10:14	112:9 121:6,8	84:5 91:2
98:11 133:20,22	operational 92:25	original 229:7	129:21,24 134:1	part 3:4 35:23
			135:2 139:14	

38:23 39:2 47:23 50:3 51:8,13 70:13 71:15 103:9 115:6 139:5 153:5 182:3 184:24 185:12 186:16,19 210:13 parte 188:11 partial 66:21 97:5 partially 64:3 participant 76:17 participants 36:23 37:15 particular 104:4 117:19 118:10 129:23 138:25 162:5 178:2 197:17 198:23 199:4 207:2 221:7 particularly 127:10 135:8,11 partner 18:8 22:13 24:9 77:6,19 79:23 80:2,6 partners 77:3,10 parts 188:25 201:4 passage 107:20 passed 190:15 Paul 1:7 36:9 39:22 48:11 49:19 107:18,19 108:4 113:13 200:8 216:22 pause 36:1 86:21 99:23 128:14 168:3 169:2 173:6 174:25 176:24 189:21 230:24 pay 127:23 PC 107:17 penultimate 140:13 175:6,18 people 1:17 18:13 24:17 30:17 34:24 39:15 46:3 59:7 75:15	120:22 157:18 perceived 60:6 197:14,16 percent 69:9 77:7 77:11 Perez 48:8 118:16 119:23 120:2 152:22 154:5,7 154:13 200:1 perfectly 24:11 25:13 39:11 period 101:16 115:14 117:20 120:20 127:1 212:15,16,17 217:25 periods 118:1,11 permanence 126:18 permission 41:7 222:4 persevere 99:8 person 6:10 64:5 64:11 66:15 69:2 154:4,6 215:8,15 215:17 226:19 232:11 personal 20:14 50:18 56:9 59:12 60:6 61:6 65:21 80:21 personally 17:10 58:22 192:4 persons 81:22 141:5 219:11 perspective 128:19 212:14 217:19 persuade 7:22,23 7:25 8:23 persuaded 17:6 62:13,19,24 64:4 64:11 66:9 persuading 17:17 perused 142:15 pervert 83:15 Peter 1:5,8 8:15 21:18 22:2 23:7 23:10 25:18,23 26:1 39:12 41:4	59:17 66:25 75:17,22 225:3,6 225:8 229:20,23 230:19 Peter's 73:23 Phillips 121:7 phone 11:24 35:20 38:22 84:19 101:9 102:3 154:16 189:11 phones 178:12 210:20,21,24 phrase 23:14 26:7 71:18 90:7 Picardo 77:15 80:5 86:7,11,12 88:19 picked 33:23 picks 39:3 picture 161:23 piece 163:21,22 pieces 76:12 152:13 172:11 212:21 pillar 24:16 placated 154:25 place 12:8 13:4 36:22 40:16 42:20 43:1 79:14 83:16 100:7 127:14 130:14 135:24 143:11 163:8 170:2 193:20 215:22,23 216:13 220:8,24 226:17 230:22 plain 71:9 plan 10:21 71:13 80:18 85:2 86:14 89:17,17,18 92:25 93:5 101:3 179:10 183:3 193:22 223:22,22 planned 11:14,17 11:23 13:25 planning 63:18 plans 11:12 13:5,7 platform 115:22 116:4,17,20	117:7,9,23 121:9 125:1,7 153:24 155:24 156:6 157:6,10 160:17 160:17 172:15 176:15 play 20:6 played 37:15 39:14,16 53:11 57:11 66:14 playing 192:15 plead 217:3 please 16:13,24 19:20 25:23 35:24 36:18 63:13,14 67:15 70:12 73:5 74:22 82:10 83:2,25 85:8,15 88:12 89:4 96:23 102:18 105:13 107:15 112:7,15 118:13 124:18 127:17 129:11 135:3 136:13,14 141:25 150:23 152:8 153:6,17 154:15 156:23 157:20 158:17 159:25 164:3,25 169:14 170:22 171:23 174:5,17 176:25 179:19 180:16 182:23 190:23 194:6 198:4 199:11 202:18 203:20 204:22 208:23 212:5 215:23 231:22 plus 212:20 pm 173:11 pocket 38:22 point 9:22 11:18 12:8 15:15 16:15 20:22 31:16 33:2 35:17 36:15 37:1 45:16 47:15 56:19 61:17	70:12 74:22 77:13 87:10 105:7,21 108:7 116:10 117:24 120:9,16 122:4 123:1,10 124:2 126:7,14 128:14 133:12 148:16,18 148:19 154:21 160:5 163:19,23 167:11,11 177:4 181:5 189:18 191:9 196:4 198:16,18 201:12 202:2,4 209:24 212:22 213:18 215:14 219:19 221:7 229:24,24 232:10 pointed 105:24 124:14 212:23 217:22 points 67:20 138:23 139:19 148:19 172:7 176:21 209:5 police 19:15 20:10 20:20 21:10,15 21:17,23 23:6 24:19 27:22 28:8 42:9,22 48:3 50:22 51:6 53:1 57:25 58:6 62:17 70:9,18 80:18 89:16,22 94:16 105:14,17,25 113:22 114:21 136:23 137:9 141:7 142:7,14 143:4 144:15 147:15 159:8,16 170:25 171:8 175:18,22,25 176:18 182:9,12 182:17 195:13 196:22 199:21 205:24 207:18 Police's 22:18 policing 128:22
---	---	---	--	--

<p>129:3 143:10 policy 137:3,4 political 140:18 141:4 173:17,22 173:23 174:1 223:8,10,13,15 politics 174:3 port 154:21 ports 106:19 pose 125:3 position 23:12 26:3,15 32:11 34:14,18,22 35:3 38:18 41:24 42:5 45:19 55:22 96:12 99:8,9,15 99:15 121:17,18 122:5,21 129:4 149:17 166:12 183:6 198:8 positively 228:13 possession 56:8,9 70:3,4 93:20 102:3 188:18 possibilities 9:14 possibility 64:12 116:6 155:10 179:8 200:15 227:10 possible 71:12 100:19 134:6 151:13,18 161:14 162:15 175:15 218:16 226:25 possibly 31:3 38:14 post 52:25 157:12 potential 69:17 118:11 123:2 130:17 132:11,21 140:18 173:17 potentially 94:4 204:19 PR 189:8 practice 54:11 129:2 135:17 140:20 148:12 149:21 173:19 191:20 198:13</p>	<p>201:13 232:17 pre-charge 55:15 pre-interview 88:11 precaution 39:1 preceded 45:9 preceding 121:6 132:2 139:20 158:19 179:18 182:13 185:4,6,9 187:3 209:16,17 209:23 precise 180:12 precisely 11:23 32:20 65:1 184:8 precision 132:1 predominantly 134:6 162:13 177:22 prefer 158:16 161:15 preference 168:22 169:7 188:10 198:24 preferrable 110:5 preferred 166:21 167:9 214:6 premise 116:3 premises 11:2 13:7 13:12 15:7 170:9 prepare 34:22 35:3,10,12 prepared 45:23 124:13 208:24 preparing 156:4,8 present 83:10 113:9 162:25 163:3 186:1,11 216:14 226:14 231:16 presentation 134:16 presenting 125:4 pressure 26:3 32:4 32:9 35:5,10,21 36:4 47:25 203:14 207:9 210:3,7 211:13 211:17,20 217:3</p>	<p>224:21 229:3,4 229:13,16,19 230:1 pressured 203:12 207:2 pressurising 40:20 presumably 26:10 26:11 38:22 40:7 63:19 86:22 114:8 226:23 227:9 presume 182:18 prevent 170:5 prevented 11:21 previous 15:17 19:17 40:13 85:20 104:23 161:4 166:25 179:14,20 193:17 203:1 207:8 previously 151:17 166:24 172:5 198:9 201:24 202:1 213:12,14 PriceCooperHo... 108:15 Pricewaterhous... 75:1 PricewatersCoo... 108:16 primarily 37:21 114:6 principal 1:14 principally 26:21 26:23 27:1,2 principle 142:19 prior 6:25 166:4 170:8 175:8,11 180:9 186:4 202:7 204:2 214:8 220:17 priorities 143:15 144:4 privacy 218:4 private 105:3 109:8,9,13,22 110:3 153:18 157:23 158:15 220:23 221:22,24</p>	<p>privately 101:18 privilege 62:21 182:10 privileged 76:14 76:16 92:14 131:2 178:25 179:2,9 180:7 182:1 185:21,24 185:25 186:7,9 186:19,24 187:7 privy 85:20 probably 3:17 27:16 38:12 42:10 109:9 135:25 173:5 188:7 194:24 213:23 223:4 probing 31:13 problem 195:17 195:18,18,20,21 197:17 222:1 problems 118:12 210:23 226:1 229:6 procedure 13:13 94:6 96:20 206:6 procedures 3:11 4:1 197:6,7,22 200:21 219:4 proceed 44:1 55:18,24 59:25 60:13 90:10 131:5 162:4 214:11,20 proceeded 3:25 60:23 98:24 211:25 214:13 proceeding 170:16 185:12 204:2 proceedings 6:2 100:11 216:7,11 process 27:13 64:14 72:5,6,7,9 74:11 155:14 156:9 177:2 181:14,19 199:4 produce 94:14 149:12 production 146:18</p>	<p>148:25 149:4 166:7,10,21 167:9 169:7 178:8 188:4,10 208:7 professional 113:16,24 215:11 professionalism 112:22 professionally 192:21 progress 33:4 114:18 progressed 206:21 progressing 80:19 progression 217:8 219:12 promised 55:7 97:3 proper 197:18,19 197:23 205:2 properly 90:6 155:12 218:20 219:3 property 119:25 125:11,16,18,19 proposal 122:1 125:6 126:4 196:20 199:16 201:8 proposals 197:6 propose 124:22 proposed 88:9 117:3 141:12 151:15 158:24 164:10 225:24 proposition 52:14 proprietary 125:9 125:22 126:1,8 140:3 prosecute 100:1 prosecuted 100:10 prosecution 48:19 98:5,17,19,24 99:3,17 100:9 113:8 117:4 118:12 123:5,6,8 123:13,15 165:6 199:9 204:9</p>
--	--	---	--	---

214:22,23 217:22 218:23,24 227:11 prosecutions 27:24 30:23 43:22 52:6 134:23 195:14 224:10 prosecutor 134:12 134:14 prosecutors 134:21,22 158:22 prospect 164:9 protect 9:2 protected 225:1 protecting 60:5 protest 45:3 prove 154:19 proven 24:18 provenance 192:14 provide 44:23 49:12 60:16 67:23 100:3,5 101:9 187:23 210:10 212:19 provided 44:7 96:1 99:2 120:24 124:3,8 128:13 132:8 152:2 156:18 161:22 180:21 182:4 199:14 200:17 211:1,5 217:21 222:24 227:1 232:20 provides 43:2 44:3 56:1 198:5 providing 173:2 227:12 provision 182:8 186:18 public 20:19 27:17 27:24 30:22 43:22 48:18 52:6 90:9 109:14 137:7 195:14 224:10 233:1,7,9 pulled 71:23 purport 21:19	37:14 purpose 12:2 28:11,22 41:10 60:5 70:1 161:19 221:18 pursuant 182:5 push 158:12 pushed 145:1 put 3:16,21 10:25 11:8 12:15,19 26:2 31:13 38:16 38:17 44:17 46:10,11 50:6 61:18 62:14 73:18 103:8 109:6 126:4 127:15 133:5 151:19,22 165:14 172:8 184:21 196:4 197:25 201:9 208:6 215:18 217:2 225:15 227:4 228:6 229:14 puts 34:17 putting 16:23 62:8 63:25 107:3 189:23 228:10 PWC 124:20 <hr/> Q <hr/> qualify 173:2 qualitative 158:4 quarter 1:4 Que 104:2 que-- 138:9 question 1:22 2:5 2:20 3:6,7 6:12 6:21 8:22 16:14 22:23 23:1,8,23 24:3,5 25:5,15,19 25:22,25 28:20 29:14,15 31:24 36:2,3 51:2 53:20 57:3 59:16 59:19 66:4 67:16 72:15 100:18 103:5 126:20 147:10 155:25 159:20 168:16	180:14 181:22 183:24 184:4 206:8 209:19,20 224:18 225:11,21 226:9,13 230:18 231:13,23 questioned 5:11 12:21 173:1 questioning 197:5 questions 12:15,19 12:23 25:7 26:20 43:12 46:23 64:19 67:14 73:18,24,24 74:7 74:12,15,18 81:6 100:15 102:8,9 109:6,11 119:4 138:4,11 164:18 165:17 220:20,23 222:3,5 225:9 quickly 35:24 41:9 52:25 54:6 222:14 223:3 quite 40:10 41:15 42:13 82:20 quotations 32:22 quoted 45:9 <hr/> R <hr/> raise 15:2 25:6 198:16 226:15,16 raised 17:23 23:21 24:7 25:4 179:20 198:25 raising 7:2 179:16 range 161:14 rank 112:16 ranking 195:11 rational 136:25 146:2 rationalisation 1:15 163:17 rationalise 2:14 rationally 40:1 Re-examination 67:12 reached 56:17 163:15 209:16 reaching 66:18 reacting 67:16	reaction 9:18,21 40:10 201:23 202:2 read 4:8 7:11,13 16:7 29:24 30:6 32:10,18 35:23 39:4 65:1,22,24 102:25 107:24 138:22 176:24 207:10 reading 6:21 23:19 32:21 44:2 52:10 64:23 177:24 181:10 187:9 reads 45:4 ready 34:22 35:3 real 169:1 177:21 realistic 164:9 232:7 reality 46:10 really 12:9 23:13 28:10 44:25 52:23 92:5 134:25 158:12 168:25 172:22 184:24 185:8 202:15 reason 28:11 57:22 58:23 59:10,11,22 65:12 97:24 118:22 122:25 128:17 150:1,3 151:16 166:17,24 167:2 171:10 176:2 193:21 218:13 reasonable 40:16 56:21,24 65:8 90:8 97:20 159:1 159:6 209:8 reasoning 125:6 138:15 reasons 22:12 51:10 149:1 175:12 189:9,9 220:9 reassemble 109:14 reassurance 82:1	108:4 recall 3:15,19 4:10 8:20 9:3 23:16 23:18 120:1 138:24 140:24 142:10,12 145:25 146:16 147:10,11 149:23 150:7 151:11 157:3 162:6 163:6,9,12 163:23 164:21 166:4,14,22 174:25 176:9 177:21 180:5 181:8 184:8 189:20 190:5,8 190:18 193:5 194:20,25 200:21 201:21,24 214:13 214:24 217:12,15 218:9,11 226:10 228:16 recalled 12:3 15:7 receive 92:1 received 28:13 74:25 97:1 119:15 207:6 210:16 reception 87:5 recognise 197:3 recognised 214:3 224:19 recollect 3:22 recollection 9:5,8 114:1,12 115:19 131:7 140:6 146:19,22,24 148:14 150:16 163:11 167:6 181:15 190:13,14 193:25 207:4,24 208:22 213:2 219:25 220:5 229:18,21 recommend 65:12 92:2 97:24 recommendation 140:22,24 recommended
---	--	--	---	---

136:24 reconsider 169:3 reconsidered 129:2 reconstitute 233:4 record 4:22 36:19 71:5 106:25 129:12 134:2 135:23 164:3 167:3 232:18,19 232:20 recorded 5:2,8 12:1 38:19,24 40:9 50:9 89:7 93:1 105:9 148:13 150:1 167:23 194:19 231:11,17 recording 38:21 39:3 167:20 189:2 194:10,14 205:14,17,18,19 recordings 9:8 92:3 110:22 205:20 records 94:12 recover 187:4 recovered 76:3 130:23 recovering 176:19 recovery 80:12 red 146:16,22 179:1 redacted 153:17 156:22 221:14 redaction 154:16 redid 108:14 reduce 2:17 132:15 155:8,13 165:14 reduced 155:1 168:9 reduction 1:16,18 refer 50:21 65:2 134:21 137:25 178:24 181:17,21 182:13 184:16 reference 3:7 5:18 5:20,22,24 6:3	8:19 9:4 41:2 62:11 67:22 71:1 79:21 102:22 103:21 106:22 118:15 124:20 130:20 132:13 141:8 144:14 150:11 154:14 159:15,19 160:6 166:20 175:13 179:1 193:2 213:9 221:6,13 221:14 references 62:22 99:14 referred 71:16,17 83:21 101:1 102:10 116:22 160:25 162:17 216:20 referring 6:7 8:12 84:21 103:16,17 103:24 104:21,22 104:25 135:22 139:8 144:17,18 144:21 161:9 167:7 169:16 202:24 204:18 205:5,23 216:20 refers 50:22 134:5 143:14 150:9 165:5 174:7 193:10 refine 134:8,14 refined 134:7,10 refinement 162:9 162:10,12 refining 162:16 reflect 211:10 reflected 1:19 2:18 149:22,24 177:20 201:4 reflects 7:3 reformulate 23:8 refreshments 218:3 regard 56:19 76:11 115:25 117:9,13 209:6	regarding 80:16 83:11 116:1,11 148:3 176:10,14 191:2 Regardless 61:6 regards 156:5 regret 230:21 reinforces 182:11 reject 52:13 relate 100:22 162:11 174:2 189:1 related 119:24 129:16 162:13,15 194:24 225:11 relates 145:13 relating 187:5 relation 36:14 45:23 66:23 68:14 80:18 83:13 88:18,20 121:2 122:5 165:21 166:2 169:16 184:6 195:3 206:3,7 207:25 relationship 113:14,16,17,21 113:25 126:23,24 127:21 131:5 135:21 223:9 relatively 22:23 relaxed 42:1 released 97:18 219:17 releasing 219:21 relevance 83:12 116:10 148:6 relevant 11:4 12:14 18:21 80:23 115:22,24 116:12 121:10 130:5 170:11 178:5 193:1 relied 127:4 reluctance 140:19 173:18 reluctantly 50:1 rely 173:1	relying 108:1 remain 219:16,23 remained 56:7,13 remaining 69:13 70:2 remains 34:14 204:5 remark 208:7 227:25 remember 3:11,13 4:16 5:6 7:6,9,14 7:18 9:10,13,15 9:17,23 10:22 13:4 26:5,6 27:15,18 34:23 42:7,8 52:15 54:16,17 79:6 83:18 103:11 105:20 114:13 117:15 160:22 165:20 219:14 225:13 228:15 229:8 remind 62:5 121:14 138:22 175:1 reminding 19:9 remitted 229:5 remove 117:8 183:3 removed 58:12 96:14 removing 117:6 render 14:21 reorder 147:6 repeat 183:23 209:19 repeated 216:17 rephrased 89:2 replace 218:6 replacing 217:24 replied 202:8,11 203:4,7 reply 33:24 36:9 36:10 52:9 report 10:23 16:2 16:20 54:6,21 58:6 59:21 63:11 63:20 74:25 75:8	83:19 133:7,8 148:5 149:13,18 150:9,15,17,22 150:24 151:4,13 152:12 156:4,13 156:18,20 161:12 164:6 168:10 169:5,11,16,19 174:4,16,18 175:3,4 177:5,9 208:24 221:7 reported 79:7 reporting 16:5 62:16 114:7,10 reports 10:24 114:16 171:16 172:6 representative 186:4 representing 18:13 20:20 represents 18:17 reputational 142:25 request 17:10 19:13 97:11 122:10 145:19,21 146:5 160:20 175:17 requested 84:12 91:22 140:20 148:3 170:24 173:20 requesting 191:24 206:23 require 11:5 170:13 required 17:9 125:8 requirement 170:3 requirements 196:23 206:15,18 requires 197:3 residence 69:1 resigned 96:5 97:4 resist 224:8 resisted 196:19 resolved 35:21 110:4 122:23
---	---	--	--	--

123:7,8 128:16 128:20 resolving 165:12 resources 174:12 respect 1:24 2:7 6:5 89:1 130:6 165:10 169:21 179:21 202:10 232:15 respected 76:10 respectful 192:11 respectfully 98:18 respective 37:14 respond 179:12 206:19 224:21 responded 52:24 122:10,11 168:24 responds 160:5 response 52:13 120:15 122:13,17 122:18 145:7 160:12 168:10,18 181:22 204:11 responses 203:10 responsibility 133:16 responsible 37:22 112:19,21 113:4 217:8 219:11 rest 173:9 restrict 85:15 restricted 76:4 140:17 result 210:2 resulted 9:19 66:1 results 211:22 resume 233:6 retaining 96:16 retirement 25:9 195:3 retrospect 187:11 230:16 return 54:24 57:5 84:17,18 209:3 209:11 returned 65:13 96:9 97:25 review 34:3 55:7 83:12 118:18,19	119:13 128:23 131:18 156:9 161:15 166:11 179:2 180:7 187:8 reviewed 53:6 55:5,9,12 56:20 97:9,16 118:21 119:14 152:4 181:20 186:3 209:7 228:17 reviewing 27:10 51:11 156:14 178:25 Revisited 97:7 revolved 195:17 RG 24:19 RGB 199:13 RGP 19:22 21:6,6 42:19 98:13,21 112:18,22 133:15 135:6 137:3,11 137:23 166:9 182:6 190:2 193:3,7 200:16 200:25 206:2 207:20 218:18 230:3 231:4 RGP's 49:5 166:12 175:11 216:15 218:7 Richardson 1:7,10 4:13 6:4,22 7:20 10:19 13:21 15:22 16:15 19:4 19:12,23 20:18 22:24 26:2 34:24 37:12 38:20 42:11 45:7 46:6 47:5 52:24 60:2 61:18 66:4 67:2 67:13 84:14 100:24,25 105:15 110:15 113:13,15 113:18 114:5 115:5 134:3 136:15 138:5 139:3 141:1 142:2,6 144:10	144:16 145:24 148:1,6 150:10 150:14,16,25 151:3 161:11,16 163:2,6,17,19 164:7 168:2 169:5,16 174:19 174:22,23 175:24 177:1,5 179:7,12 180:3 188:18 189:18 191:7,9 191:15 192:2 194:8 196:19,24 199:12 200:10 203:21 205:12 208:25 212:6 213:2,3,17,24 216:22 219:15,22 221:21,24 225:11 225:21,24 227:5 228:4 Richardson's 21:20,20 140:23 149:25 190:16 227:25 230:5 right 1:21 2:21 11:11 12:11 23:9 28:25 30:20 40:4 40:10 42:13 51:22 52:1 54:5 57:9 59:22,25 80:13 84:24 101:6,9 103:25 108:11 110:6 112:23 125:16,22 126:1,8 128:6 139:13 140:3 149:14,14 159:17 178:4,13 185:5 220:14 222:3 229:14 right- 138:11 rightly 29:5 197:16 rights 125:10 rise 80:15 138:20 risk 81:15 82:8 171:4 risks 142:25	robust 48:17 49:19 200:14 robustly 52:13 Rocca 27:5 31:3,5 31:7,11 32:9 33:15,21 34:5,18 43:21 45:2 48:19 55:16 85:1,9 86:2,20 role 37:16 53:11 57:11 66:14,18 113:2 151:17 212:3 roles 37:14 215:11 rolling 126:25 room 7:16 72:21 89:12 92:6 102:13 195:11 232:14 rooms 218:1 roughly 101:25 round 44:23 route 6:20 8:2 68:16 117:17 206:23 routes 81:14 routine 133:22 RPG's 56:9 rudimentary 17:11 rule 24:16 37:20 65:18 run 38:21 190:21 192:24 193:11,14 193:19,23 running 83:11 <hr/> S <hr/> s-- 68:12 S-H-I-T 50:14,16 sabbatical 223:19 sabotage 152:15 153:5 154:19 safe 56:11 65:9 95:7 97:21 safeguard 142:23 safeguards 205:2 safest 197:4 Sanchez 3:7,10 5:23 6:18 7:23	7:24 8:2,21 9:2,5 67:17 68:1,7,15 82:4 83:21 84:11 100:4 164:12 Sanchez's 83:6 121:4 Santos 100:20,22 102:7,8 103:5 109:16 110:2,9 111:2,4,7 173:14 222:8 229:1,11 229:17,21 233:1 233:5 Santos's 81:6 sat 94:12 127:22 162:2 satisfactory 81:9 save 52:10 saved 26:19 saw 5:4 11:1 151:7 saying 1:13 4:16 9:19,21 10:10 14:25 15:1,3 22:16 23:16,18 25:1,4,8 26:14 31:20 33:13,24 36:15 40:4 42:23 45:17 48:2 52:17 53:16 58:21,25 59:1,2,3,23 60:1 60:8,8 61:12,13 61:16 68:6 72:24 79:21 103:25 104:14 105:25 123:4 124:15 126:2 127:17 132:14 150:19 152:17 154:13 183:25 184:1,13 193:20 198:22 199:20 202:11 218:9,11 219:10 221:15 225:13 227:21 229:9 says 7:4,7 16:9,25 31:5,19 33:6,18 33:21 34:13 36:6 36:12,14 39:18 41:14 42:9 43:9
---	--	--	--	--

43:10,13 44:9 46:20 47:2,20 48:9,11 49:16,18 49:22 50:9,15 63:13 67:20 72:4 102:19 106:18 107:20 119:13 124:22 129:21,24 130:22 133:12 142:15 148:2 154:17 160:3,8 169:25 170:23 173:16 183:1 185:14,17 189:3 192:23 196:10 200:7,8,10 202:23 203:3 204:14 205:25 207:19 215:25 219:10 scenario 158:13 200:18,19 scenes 91:12 schedule 177:3 180:20 182:5 screen 10:25 16:12 39:19 62:4 67:15 70:13 71:23 82:10 165:3 225:19 screening 99:13 scroll 39:14 130:19 176:23 se 104:12 sea 105:19 seal 62:19 64:4 sealed 34:1 56:7 56:10 95:6 search 11:15,16 13:13 17:11 30:5 35:13 54:23 81:14 87:3,6,7 92:8 96:17 101:5 130:23 141:11,12 141:24 143:22 144:7,19,21 145:17 146:10,13 146:18 147:3,8 147:19 159:10,14	159:23 166:5,8 166:21 167:10 170:16,18,19 177:18 178:3 179:21 180:10,11 182:5 186:23 188:3,18 189:9 189:19 191:2,15 191:17,19,23 201:20 202:10,25 207:23 208:1,3,5 209:1 210:16,17 210:22 223:23 searches 192:25 193:11,14,18,23 searching 57:1 second 1:21 12:17 36:7 38:16 42:22 43:13 68:18 91:9 99:15 100:23 111:23 121:8 124:22 145:2 158:1 165:2 185:13 207:15 213:22 secondly 145:16 seconds 102:5 secretary 67:23 120:11,14,16 121:19 122:11 Secrets 129:17 section 139:2,9 141:1 152:9,12 153:8 155:17 172:6 173:25 185:1 186:12,14 186:15 secure 170:7 175:7 security 129:16 132:24 142:23 156:6,13,19 160:4 see 12:25 15:23 19:16,17,21 21:4 22:16 27:9 30:6 30:15 32:11 34:12 36:25 44:14,15 50:11 55:7,10,12 56:1	59:1,9 61:19 71:23 72:2,4,5,13 84:1,3 90:8 93:13 99:20 102:24 106:10 118:16 123:1 130:19 134:20 138:21 142:3 151:4 154:8 156:14 162:22 179:4 187:9 194:11 201:11 205:23 208:16 225:19 229:13 seek 11:3 61:4 88:13 133:23 146:12 161:17 170:10 186:9 seeking 155:1 159:13 186:21 seeks 108:4 seen 4:8,10 5:20 61:20 62:22 64:1 65:14 68:2,8,17 70:18 94:25 105:6 137:15 202:6 223:21 sees 40:2,4 seize 87:6 170:3 179:10 182:9,12 seized 186:2 seizing 80:21 seizure 33:14 140:15 186:19 seizures 193:19 select 132:19 selected 32:21 131:20 133:13 self- 181:6 self-isolation 181:9 send 16:18 48:21 62:8 63:18 151:6 174:19,24 sending 16:16 142:9 145:10 sends 48:1 154:13 199:19 senior 76:9 79:22	80:6 113:11 114:6 178:6 seniority 75:15 76:7 sense 119:20 155:7 167:17 senses 214:24 sensible 39:11 sensitivities 140:18 141:5 173:17,24 174:1 223:8,15 sent 54:15 61:21 63:4,5,10,12 73:25 74:7 106:11 138:5 139:2 145:7,11 146:8 150:25 151:5 157:8 161:11 174:21 177:6 214:17 sentence 65:23,25 174:8 190:1 213:14 sentences 119:1 sentiment 49:24 separate 92:21 93:10 September 120:12 121:4,15 129:12 130:18 Sergeant 134:4 181:15 182:21 serial 46:8 series 178:23 serious 20:23 27:13 75:12,14 133:18 135:9 190:21 seriousness 74:23 74:23 75:10 76:6 158:4,6,7 serve 221:18 served 88:10 serves 79:9 139:1 Service 3:10 4:1 6:19 services 127:23 session 76:1	109:13,15,22 110:4 233:2 set 5:3 82:16 85:12 87:22 88:16 90:24 91:6 142:21 143:6 146:16,22 160:8 176:15 183:12,19 198:8 sets 48:7,7 62:7 183:6,17 199:25 setting 130:25 136:25 settle 15:12 seven 33:25 34:8 50:23 51:20 seventh 36:15 shared 227:9 sharp 148:12 149:20 shied 195:15 shocked 4:14,16 6:10 shockedness 10:1 shocking 4:21 5:24 6:8 9:25 shop 127:20 short 67:7,10,13 73:8 76:1 100:18 102:8 110:12 173:12 225:8 shorten 160:24 shorthand 67:4 136:17 show 121:5,6 153:4 172:23 174:6 183:8 showed 184:6 shown 60:21 198:24 shows 83:10 137:23 shy 82:7 sic 68:25 side 84:2,4 94:4 124:10 138:12 sight 134:17 sign 101:19 signature 111:16
--	---	---	--	--

111:24 112:9 signed 102:2 128:8 128:9 significance 77:4 significant 82:25 silk 17:8 101:18 Silver 143:12,13 similar 121:8 190:4 198:17 simple 33:18,21 simply 127:16 130:3 131:2 179:16 182:11 199:2 203:10 single 6:9 114:13 156:14 162:19 169:9 SIO 192:1 213:9 sir 1:5,6,8 8:15,16 10:7 15:16,19,21 16:7,12,25 17:1 19:5 21:18,18 22:2 23:7,8,10,22 24:2,4 25:18,19 25:21,23 26:1 29:10 32:24 36:1 37:10,23 38:18 39:12 41:4,4,7 43:3 45:8 50:9 51:2 52:20 55:20 59:17 63:3,14 64:23 66:25 70:11 73:23 75:17,17,22 77:9 82:15 83:20 84:3 84:22 89:10 92:22 99:14 100:15,17 177:2 203:22 225:3,3,6 225:8 229:20,23 230:19 233:5 sit 33:25 216:23 218:12,25 219:4 sits 94:16 sitting 7:15 44:6 127:20,25 situ 170:7 175:8 situation 94:10 153:3 190:22	205:24 232:6 six 41:12 50:16,22 152:19 216:3 Skembury 78:14 79:7 skip 124:21 skipped 33:19 skipping 41:17 slight 146:15 slightly 27:7 148:17 152:5 176:23 slower 36:18 smack 47:24 so-called 54:6 115:20 122:2 sold 119:25 121:10 solicitor 73:13 Solicitors 73:21 solve 195:18 somebody 14:20 21:5 24:24 49:25 65:16 90:4 94:16 155:2 186:13 191:24 194:21,22 201:15 221:19 somebody's 125:9 125:11,25 someone's 232:8 somewhat 4:23 son 18:2 23:24 24:1,9 Soon 21:1 sorry 5:16 8:6,12 8:15 15:20 18:5 20:13 22:22 23:16,22 24:4 36:1 39:8 43:3 51:2 61:22 62:2 68:13 70:4,11 78:5 84:3 86:11 95:18 101:23 102:22 103:5 105:11,16 107:14 121:14,15 123:21 125:14 126:14 138:14 139:8,17 141:21 144:22 145:7 147:5,6,16	147:17,21 149:2 149:2,3,5,8 150:23 151:9 155:16 157:25 159:19 160:22,24 165:1 173:2,22 175:1,1 176:23 183:14,16 185:5 187:19 193:16 198:3 199:17 204:24 205:7 206:8 208:13 209:18 222:24 225:17 226:9 228:6,8,15 229:17,20 231:13 sort 47:8 48:24 49:15 70:21 143:22 144:14 sorted 70:5 sought 9:2 20:25 27:22 29:6,16,25 30:1 55:14 108:11,19 126:14 129:23 130:5 147:2,8,19 158:25 164:6 178:10 181:25 185:15,18,23 186:7,8 187:4,21 187:25 218:20 sound 32:2,3 47:3 sounding 125:15 126:9 sounds 52:21 source 104:7,20 sources 92:19 93:9 Spanish 42:6 speak 44:22 79:22 80:6 82:5 212:8 213:7 speakers 31:1 speaking 30:22 34:23 47:22 91:10 115:10 212:24 special 185:12 specific 117:16 186:18	specifically 143:17 146:10 158:22 166:1 171:11 190:19 191:1 spectre 15:2 speed 156:9 spending 41:15 spent 38:9 132:3 split 217:7 219:10 219:12 spoke 54:14 87:15 115:5 154:13,16 167:5 213:9 214:4 spoken 89:13 152:23 207:19 212:7,25 228:1 spontaneous 94:15 stage 9:1 30:23 31:14 55:24 60:25 90:3 109:10 122:12 124:8 131:24 151:15 158:16 159:13 161:20 162:6 165:7 183:5 194:20 205:22 214:15 218:16 222:16 stages 118:23 181:3,18 stake 142:25 stall 48:7,8 199:25 stance 121:12 stand 206:6 standard 201:13 standstill 34:8 start 1:11 31:2 49:11 67:20 96:20 110:8 153:7 181:19 started 7:16 26:14 28:3 45:10 218:5 starting 102:18 177:2 starts 139:9 155:20 185:22 state 53:19 65:18 112:16	stated 12:9 28:22 81:12 83:5 127:12 152:23 161:17 164:11,13 165:17 166:9 199:2 205:1 statement 4:7,9 5:4,13 6:15 7:5 7:13 12:18 22:7 43:23,23 44:3,10 46:15,16 47:16 47:17,20 48:2,6 48:22 49:17 51:21,24 63:16 67:24 73:16 74:4 74:9 91:25 93:24 94:9 95:13,22 96:1 98:3 99:2 111:14,15,16,18 111:22,24 112:6 112:8 121:8 129:15 131:15 137:22 141:4 165:25 167:4 176:7 177:20 180:17 182:3,11 198:6,9 199:15 199:19,24 200:17 201:10,15 202:19 203:1 204:3,8,14 206:24 210:11,15 211:6,15 214:21 215:3,25 227:1 227:12 229:8 statements 4:20 5:1,8 7:8,12 73:6 73:10 74:19 111:12 113:6 131:18 132:4,10 152:1,3,3 172:12 210:16 station 28:8 69:24 94:17 170:25 175:18 217:20 status 129:16 145:16 204:4 statutory 206:15 stayed 40:11 steer 29:2
---	--	--	--	---

stemmed 229:7	204:21,23 211:7	157:13 180:1	135:19 137:2	switch 51:9
step 98:15 195:24 221:19	219:24 224:16 229:6	summary 63:15 182:25 183:6	139:19 143:17 144:25 147:11	switched 105:22 106:20 107:1,7,8 107:12
STI 73:19,20	subsequently 16:18 117:11	Sunday 48:12 200:9	153:16 154:8 158:2 163:22	Sworn 111:6
stop 39:16 100:6 126:14 127:17 153:11 154:15 165:6 184:13	123:19 148:17 174:14 206:24 210:12 226:1	superintendent 15:25 43:14 105:15 111:4,8 112:17,20 113:13 113:15 114:5 134:3 136:15 140:23,25 142:1 142:6 144:16 148:1,6 149:25 150:10,13,25 161:11 163:1,6 164:7 169:5,15 174:19,23 175:24 179:12 180:3 194:8 199:12 205:12 212:6 213:3 216:22 227:4,6,24 230:5	168:6,23 178:21 186:12 189:22 192:20 194:20,23 197:13,23 202:1 202:15 203:14 205:19 210:18 214:4 215:4 221:2,17 222:1 224:24 226:21 228:22	symptoms 181:7 system 82:1 106:25 152:20 154:19 156:1,19 157:14 161:1 192:25 systems 193:2
stopped 100:11 107:11 123:9	substantial 124:4 170:1 221:3		202:15 203:14 205:19 210:18 214:4 215:4 221:2,17 222:1 224:24 226:21 228:22	<hr/> T <hr/>
straightaway 101:13	substantially 214:14		surely 60:1,7 64:7	tab 111:12,22 112:7
straightforward 22:23	substantiate 184:25		surmounted 178:2	table 94:9
strange 195:7	substantiation 167:8		surprise 24:14	tables 118:25
strategic 143:12	substantive 73:10 149:7		surprised 4:25 23:14	tactical 50:24 51:8 51:12 142:20 143:4,5,9,13,14 143:15,18,21 144:14,18
strategies 144:6	successful 166:13		surprising 4:24	take 12:1 14:13 19:8 46:21,22 50:25 60:17 65:5 82:7 89:2 94:13 101:15 102:17 106:14 116:8 117:18 130:1 131:16 135:6 137:21 138:23 140:12 141:14,19 141:22 145:14 157:23 162:21,23 164:24 165:24 168:15 169:13 173:6 179:17 182:23 189:22 192:2 193:13,23 195:24 197:21 202:16 208:17 216:12 217:16 220:24 221:1
straying 149:4	sufficient 60:22 65:19 81:10 90:6 126:18 127:14 220:12		surrendered 14:2	taken 10:7 36:22 38:25 64:6 70:3 70:4,21 90:1,3,12 91:23 107:15 121:12 135:16 182:16 188:12
strength 40:2 96:16 168:8,24	sufficiently 48:17 200:14	superiors 216:17 216:20 218:9 220:4	survive 123:13	
strong 7:25 221:11	suggest 10:10 55:4 119:1,14 125:25 127:4,15 172:12 178:19 179:3 191:20 192:10 231:1,7 232:4	supplementary 74:6	suspect 21:5 24:19 47:19 51:9 55:9 56:14,25 65:16 74:21 82:24 87:11 94:22 98:14 137:24 138:2,16 140:10 145:16 157:1 159:2,7 164:18 164:23 165:22 170:4 172:1 176:17 191:5 204:5 205:4 215:5,13,15 220:8,12,14 221:12 230:14	
strongly 207:22 208:2	suggested 5:25 64:15 79:25 94:20 103:12 110:20 139:23 142:19 197:20 201:9 204:10	support 44:20 89:23 108:20 120:23 135:10 142:18 152:13 161:21 172:12,21 185:9 224:8,14 224:16,24,25	survived 123:13	
struck 29:23	suggesting 20:3 34:6 47:11 83:8 217:1	supported 108:25 123:19 143:2 145:4	supported 123:13	
structure 143:20	suggestion 8:1 40:19 67:17 68:14 70:23 71:8 72:8 91:14 93:23 140:22 145:3 165:8 189:16 201:17	supporting 27:6 89:16	supported 123:13	
structured 136:25	suggests 26:11 153:21 154:3	supports 224:16	supported 123:13	
structures 143:10		suppose 47:14 155:14 196:3	supported 123:13	
struggled 224:18		sure 36:19 50:4 58:18 77:19 89:24 92:22 109:2,20 116:8 119:5 120:20 126:20 127:8	supported 123:13	
stuff 55:25			supported 123:13	
subject 16:10 70:14 125:2 142:22 143:7 182:10 187:21,23 187:24 198:13 199:8 219:17,21			supported 123:13	
subjected 211:12			supported 123:13	
subjects 185:19			supported 123:13	
submission 55:11 120:5			supported 123:13	
submissions 7:17 118:15,18,20,21 118:24 119:7,13 119:15 201:8			supported 123:13	
submit 43:5 171:1 226:3			supported 123:13	
submitted 55:6 164:7 176:4			supported 123:13	
subsequent 154:7 154:12 166:18			supported 123:13	

190:3,24,25 191:1,4 193:20 216:19 218:16 takes 82:20 talk 218:23 talked 223:7 talking 1:11 2:11 10:12 30:18 32:16 149:6 160:16 175:2 223:11,12 225:18 talks 84:13 tamper 152:20 tape 38:21 39:1 58:7 TC 83:7 107:23 108:1 team 50:25 51:1 152:18 153:1,23 154:14 178:10 181:12,14 team's 138:15 technical 69:2,7,15 69:16,20 70:9 126:9 132:6 technician 193:8 193:10 techniques 199:6 telephone 92:10 95:5 tell 7:8 37:23 38:6 45:8 63:25 85:6 85:21 86:19 92:24 103:18 104:2,3,13,14 107:4 152:7 176:6 213:25 231:18,20 telling 59:9,20 template 182:3,14 182:16,22 templates 182:6,7 temporarily 197:8 ten 62:15 77:7 100:23 102:4 tend 135:6 tenor 49:7 term 125:12 130:3 215:9,10	terminated 13:9 13:14 terms 44:11 45:3 75:10,15 76:6 110:3 114:2 118:8 122:8,17 123:21 125:7 131:24 132:1,5 143:18 144:7 145:15 158:5 162:18 167:8 168:7,8 174:3 175:15 177:19,25 184:15 197:22 200:25 201:3 208:19 210:19 211:7 215:1 223:15 232:19 test 140:5 text 16:17 152:22 153:21 154:2,7 154:12 161:4 texts 138:4,10,13 138:17 153:24 157:8 thank 8:16 11:11 15:12,14 17:14 17:22 26:19 34:11 36:6 43:20 54:2 63:24 67:1 67:3,8 71:25 72:14 77:21 78:7 82:11 96:23 102:6,24 107:19 109:5 110:19 111:1,21 112:15 126:15,16 154:12 173:5 205:10 222:11 223:3 225:2 229:24 230:1 233:5,8 thankfully 33:1 thanks 9:7 thereabouts 77:9 thing 6:9 10:1 22:11 29:23 59:7 60:1 61:21 64:15 70:21 73:5 196:12 200:6	220:21 things 33:13 39:25 40:11 41:20 46:5 49:12 57:14 72:25 73:2 89:6 90:11 102:13 103:10,13 124:10 144:15 152:6 176:21 189:1 206:9,10 218:14 think 1:13 7:25 11:7,9 12:3,12,13 13:20 14:20 20:17 22:11 23:14 25:25 26:21 29:4 32:10 33:18,21 34:2 38:8 39:20,21,23 39:23,23 40:16 41:18,19 45:4,11 45:22 47:10 49:20 51:17 55:19 60:25 61:25 62:3 66:5 67:6,19,21 69:9 69:14 71:2 73:3 74:17 75:22 76:13 78:6 79:3 81:19 82:6 83:2 84:25 90:7 95:19 102:14 103:10,22 103:23 107:20 109:8,16 112:6 112:23 117:20 118:7 122:18,25 125:12 126:4,21 128:18,18 132:2 137:21 138:5,6 139:1,4 140:4 141:14,18 144:23 144:24 145:1 146:14 148:16 149:3 150:3 159:20 160:3,12 161:18,19 162:14 165:2 166:24 167:5 168:15,18 169:9,12 172:22 173:5 176:21	177:20 185:4 186:11,15 187:11 190:23 191:8 192:4,9 194:23 194:24 196:8,11 196:18 198:16 200:6 201:4,24 202:3,4,19 204:20 206:22 210:8 211:9,19 211:21 213:23 214:3 219:24 221:17 222:2,6 223:4,8 224:6,7 224:18,18 229:15 230:1,12,20 231:19,23 232:6 232:10 thinking 67:3 166:23 201:24 thinks 21:21 third 39:15 53:5,7 70:12 95:10 97:18 112:7,8 137:22 145:23 165:24 180:16 thirty 95:17,18 96:18 thoroughly 60:4 thought 19:24 22:7 43:4,17 74:24 100:5 138:19 155:14 168:3,12 226:2 thoughts 167:13 195:9 202:5,13 202:14 223:25 thread 230:18 threat 60:6 threatened 58:22 three 5:18 9:3,11 26:16 27:25 46:7 53:6 67:19 71:18 77:11 78:21 79:1 98:25 99:17 110:22 132:3,25 137:22 143:24 152:11 155:21 190:1 225:4,8	time 5:10 6:13 7:3 9:24 13:17 14:16 19:9 21:16 24:15 33:7 35:20 38:9 38:12,20 41:15 41:25 49:3 50:6 50:8 52:18 55:18 58:5 67:10 69:11 76:2 77:20 81:12 82:20 91:3 92:21 93:9 94:13 95:5 96:8 101:16 104:8,17 113:11 113:15,23 116:21 117:19 118:11 119:17 120:4,9 121:15,18 123:14 124:13 127:1 130:12 131:22 133:6 136:20 137:2 138:18 139:7 141:10 149:2 153:19 170:1 171:7,10 173:4,12 175:21 178:16 180:2 193:13 194:25,25 199:18 204:8 205:16,17 210:14 210:15 212:15 217:11,25 219:8 219:19 220:10,25 221:2 228:23 231:21 232:12 time's 48:23 timeline 149:11 times 27:5 215:9 timing 68:19 titled 139:11 152:10 today 41:15 105:7 110:16,18 188:2 told 14:8 20:9 22:8 106:24 110:2 152:24 155:2,3 166:23 190:3 207:20 217:5 tomorrow 37:9 203:24
---	--	---	--	--

tone 52:16	Triay 19:20	205:20 222:5,10	understood 1:18	usually 131:24
top 14:5 16:6,13	225:18	225:4 227:24,24	10:8 139:7,22	134:16 143:11,14
23:20 29:3 30:21	tried 63:7 74:13,15	typed 194:21	141:19 146:20	144:1 191:23
36:7 39:14 142:3	87:1 160:24	205:22	185:25	utilised 182:7
152:9 158:17	187:17 219:3	types 117:1 132:25	unethical 232:24	
171:24,25 176:24	tries 40:5	typical 133:14,17	Unexamined 95:8	V
187:20 199:11	trouble 39:4	133:18	95:9	value 49:22 50:5
224:23	221:25 222:9	typically 196:16	unfortunately	221:3 227:22
topic 88:13 212:2	true 14:22 24:21		218:21	variance 26:17
topics 88:8,22	40:18 111:18	U	Unfortunatelly	various 48:20
totality 221:10	112:2,11 120:6,8	Uh-huh 79:5	217:25	196:1 216:14
totally 31:7 168:22	226:21	103:15	uniform 87:4	vein 36:13 39:6
touched 34:1	truth 218:8	UK 17:8 73:14	unilateral 64:17	verified 108:17
trained 196:25,25	try 7:22 8:23 36:1	84:12 101:18	unimpeachable	version 43:5,8,12
training 137:8	105:2 132:9	108:13 136:24	104:7	87:12 89:5 181:2
transcribed	154:18 191:21	137:5 182:16	unintended 230:13	196:6 226:3,5
166:19 167:11	try-- 151:9	Ullger 59:20 63:19	230:13	vessel 105:22
transcribers 173:9	trying 23:7,10	64:1,8	Unit 108:13	viable 179:5
transcribing 110:3	44:11 46:5,10,13	ultimate 77:1	unlawful 128:4	video 70:15 164:4
transcript 14:7,13	49:1 90:7 128:2	78:12 79:8	172:24 197:21	view 3:25 5:23
23:19 29:1,21,24	128:5 140:5	ultimately 59:21	unlawfully 125:12	18:17 21:4 46:22
32:11,12,19	151:9 184:9	81:1 161:18,24	unlawfulness	47:15 82:6 91:23
38:16,17,25 39:5	195:8 217:2,3	211:24	125:13 140:1,2	123:14,16,19,24
39:17,19 40:7	219:6 228:8	um 47:18	165:9	127:24,24 135:16
50:7 58:8 71:15	229:11,12	unable 166:16	unpicked 77:2	146:20 148:11
73:4 103:20	turn 2:11 33:1	unauthorised	unpicking 78:12	152:5 166:6,13
105:6 194:11,21	34:11 54:3 70:19	132:21,22,23	unsigned 127:4	167:18 170:15
201:5 205:21	77:2 87:4 105:12	underlying 119:23	128:13	178:8 197:11
207:11 208:18	111:21 118:13	121:9	unsuccessfully	208:4,11,14
transcripts 52:11	129:11 136:13	undermine 199:9	160:25	215:12,15 219:18
64:2 208:17	157:20 159:25	understand 9:20	untainted 94:15	219:23 220:6
transfer 160:13	164:2 169:11	10:9 22:22 36:8	unusual 128:22	221:11 231:24
transferring	173:15 178:22	46:14 63:22	129:2 212:1	232:24
160:11	207:12	92:22 98:19	update 106:16	viewing 128:18
transitional	turning 87:2	125:17 127:7	114:18	views 16:24 27:6,7
212:15,17	115:20 213:5	143:3,8 144:13	updated 182:19	46:21 63:13,17
translated 196:6	twice 82:7	145:5 146:11	upholding 37:21	120:14 158:8
transpired 206:9	two 1:24 2:1,7	153:13 162:1	upset 86:16 218:6	231:16
travesty 44:25	4:20 6:15 35:17	168:22 173:23	urgently 97:16	viewscreens 62:6
treat 192:5 227:2	42:20 46:21 54:4	200:21,23 206:8	USBs 214:18	vigorous 224:3
treated 34:24	65:2,5 68:13,22	212:13,20 215:16	use 11:4 28:4	vigorously 174:10
164:14,18,23	73:10 90:12	220:10	47:18 136:20	vindication 65:15
192:4 198:23	92:19 93:9 97:17	understandably	159:22 161:25	virtue 18:10 127:1
226:25 227:13	104:10 109:5	27:18	166:10 170:12	visit 189:9
treating 137:24	115:25 116:22	understanding	178:4 198:10	visual 83:6
138:1,16 140:10	132:3 148:17	21:19 29:8,10	227:16	voluntarily 14:3
165:21	149:10 150:6	132:6 150:12	useful 47:17	17:9 26:10 34:16
treatment 192:18	152:13 163:21	184:14 186:6,22	167:23 227:6,15	48:6 87:16 101:9
tremendous 87:10	176:21 202:7	understands	usual 136:20	199:24 210:22
		186:11		voluntariness

26:12	87:3,15,18 95:12	100:5 117:3	whatsoever 53:12	72:15 81:15
voluntary 101:4	95:16,19 96:8,17	136:24 140:8	66:14	102:14 103:11
170:19 199:14	96:18 101:5	154:20 170:16	whichever 224:7	140:4 190:4
200:17 201:10,14	140:16,19,20	171:5 172:17	whilst 33:4 41:22	192:24 198:1
206:24 210:10	141:11,12,25	177:7,8,24	49:4 59:9 90:10	222:19 228:15
211:6,15 227:12	143:23 144:1,7	184:21 190:19	166:6 170:1	work 108:14
229:8	144:19,21 145:17	192:8 196:4	181:1 190:2	160:14 162:22
volunteer 109:19	146:10,13,19	197:3,4 198:19	207:20 216:25	224:22,23
volunteered' 44:10	147:3,8,19	198:23 199:8	224:23 233:4	worked 107:10
voy 104:12	159:14 166:5,8	203:12,18 206:10	white 231:25	113:19 114:1,3
	166:22 167:10	207:2 211:18	widest 227:11	223:18
	168:4,17 170:12	218:21 224:7	wife 77:18,19	working 2:22
W	170:12,17,18,19	227:2	windows 216:9	107:11 118:1
Wagner 23:22	173:18,19 175:9	ways 40:5 65:3	Windy 106:19	131:3,13,21
24:4 39:6,8	177:7,9,15,18	we'll 33:25	wiping 84:19	works 43:16
57:16 100:16,17	178:3,16 179:21	we're 10:12 41:16	wish 124:23	worn 12:2 14:7,14
100:23 102:6	180:10,25 182:5	43:7 49:20	230:16	71:4,9 174:7
wait 16:14 44:9	188:3,16,19,22	132:14	withdraw 233:3	188:20
55:25 97:9	189:19 191:17,22	we've 10:8 36:8	withdrawn 21:2	worried 154:22
156:13 189:4	201:20 207:23	46:23 48:16	88:2 100:2	worry 152:24
waiting 60:14	208:1,3,5,11,15	61:25	witness 4:9,20 5:4	154:18 155:1,2
179:25 189:6	208:20 210:16,18	wealth 232:20	5:8,12 6:14 7:4,8	202:12,16 203:8
Wales 182:8	210:23 220:4	wear 141:10,16	7:12 8:17 12:17	203:11
want 6:21 16:5,15	223:23	wearing 70:19	22:1 23:12 25:21	worse 37:19 39:22
19:16 30:6 33:7	warrant,' 191:2	71:9	43:23 47:16,19	worth 109:9
34:8 36:18 39:8	warrants 28:7	Webber 129:15	48:1,22 49:21,22	wouldn't 15:10
41:9,25 43:12	81:8 90:17,23	130:21,22,24	50:5 51:10,24	17:2 90:12 94:6
45:13 50:2 90:19	159:10,23 177:3	week 34:22 35:2,9	55:9 67:4 98:17	109:3 128:20
94:14 103:1,18	180:11,20 189:10	35:11	98:19 111:2,12	131:23 150:4
106:4,14 142:4	190:3 191:20	weekend 48:1	111:13,15,23	155:3 163:10
157:23 158:12	202:10,25	199:15,19	112:8 113:6	190:25 200:10
178:18 184:13	wasn't 32:9 42:10	weeks 6:6 80:11	132:10 164:14	232:21
188:1 189:2	58:18 71:8 94:2	weighing 232:13	165:24 176:7	wrap 36:7 37:5,6,7
204:10 212:8	94:24 99:11	well-versed 197:2	180:16 199:19	write 173:25
221:1 228:24	108:21 120:17	went 10:21 11:13	204:6,11 215:12	183:14
229:17	122:14 133:3	13:23 38:11 69:5	215:20 218:1	writer 67:4
wanted 3:18 12:6	146:23 161:17	73:13 95:17,20	222:6 227:1,14	writes 90:15 98:10
41:19,22 100:18	163:5 177:13	100:8 114:14	227:22 229:22	writing 43:9
109:21 154:24,25	191:19 200:24	118:24 127:22	wonder 18:25	160:19 163:20
154:25 184:17	205:5 215:7	139:5 146:1,6	82:11 225:3	168:10 201:6
194:2 195:25	218:18,19 219:6	150:19 156:11	word 7:25 16:10	written 4:7 44:9
196:2 203:4	water 31:12	181:9 191:10,12	34:9 89:2 108:11	46:14,16 58:6
213:4 217:10	way 3:19,20,22 5:6	203:15	135:20,21 186:8	139:3 167:3
218:15,17 221:4	10:2 11:20 13:6	were-- 195:22	193:14,18 229:14	203:23 204:1,14
221:15	33:21 34:6 36:24	weren't 18:7 74:18	wording 3:9 81:7	wrong 20:3,17
warrant 11:5,5,15	42:3,5 43:20	108:18 124:12	132:1 141:13	57:21,21 82:12
11:16 14:1 17:7	44:23 49:1 64:21	168:20	words 11:9 42:7	107:4 146:25
17:19 27:12 30:5	66:6 72:1 80:19	Whatsapp 83:7	44:2 50:18 52:15	186:13
35:13 60:22 66:2	81:8 82:12 94:3	207:13	53:5 57:20 64:7	wrongly 197:16
66:23 78:9 81:14				
84:23 85:2 86:18				

wrote 139:2,5 141:1 152:1 154:5,6 156:2,16 160:12 166:17 Wyan 10:22 13:25 15:25 16:6,17,24 17:1 44:5 47:13 49:22 50:4 54:9 54:15 57:4 61:21 63:5,12,16 68:22 69:6,14,23 70:1 72:20 85:10 86:2 107:17 108:3 109:14,22 110:8 111:4,6,8 216:2,7 216:16 217:2,9 222:13 225:2,9 Wyan's 66:19 82:13	145:7,9 161:13 164:8 169:18 177:3 179:1 180:20 182:5 1.11.13 50:14 1.30 109:15 10 48:22 63:24 79:1 10.00 1:2 233:10 10.11 106:12,13 10.18 67:9 10.28 67:11 10.30 28:24 10.41 77:17 10.56 79:18 100 183:12 194:23 11 156:2 11.00 51:15 117 154:11 11th 35:12 12 1:1 10:19 54:23 57:20 66:7 68:19 87:1 101:1 188:17 189:5 207:15 208:10,13 208:14 209:2 220:18 12.10 105:18 12.25 110:11 12.30 109:13 189:3 189:4 12.46 189:7 12.50 189:11 12th 88:1 13 2:9 17:24 29:1 79:11 89:8,13 105:4 181:21 202:7,21 13.00 110:13 13.31 131:11 132 152:15 154:1 133 152:22 154:2 135 155:17,21 137 155:17 156:16 13th 28:1 42:21 14 79:4,10 14.00 154:10 14.41 210:5 14.44 173:13	14th 90:14 15 6:14 83:22 91:9 115:12 124:19 170:22 175:16 194:5,6 201:16 203:13 205:18 233:10 15:41 207:14 1514 189:25 15th 28:1 41:8 208:21 16 175:19 16.11 233:11 17 203:21 204:12 18 83:3,4 97:1 19 112:25 152:16 153:8 181:8 208:25 19.33 43:21 19:45 198:5	162:20 163:4 164:2,8 174:17 176:17 178:23 180:23 194:5,6 201:16 202:21 203:22 207:16 208:25 209:7 212:5 213:8 2021 215:22,24 216:3 2024 1:1 233:10 20th 204:21,25 205:6 224:15 21 134:2 210 124:19 22 174:17 220 23:20 23 156:16 236 41:10 25 66:20 151:23 261 50:21 2622 121:6 27 118:14 160:1,7 160:9 28 15:25 55:15 176:8 213:8 28.22 84:1,3 28.24 84:5 29 176:8 186:15	33 140:16 3302 89:4 338 158:22 34 140:16 3432 54:4 3452 171:23 3455 171:24,25,25 3456 173:16 3475 71:16 35 62:9 140:17 173:16 36 18:9 49:14 77:4 77:7 79:18 117:22 128:1 131:1 155:23 160:11 164:17 176:15 3623 159:25 3630 152:8 3666 157:20 158:17 36N 160:13 37 141:4 3716 131:16 3717 134:1 39 141:8 174:6
X				
Y				
yeah 30:17 40:2 136:19 141:13 149:8 year 120:13 157:13 years 113:18 yesterday 1:13,25 3:12 4:14,21,21 5:4,10 6:13,25 7:2 10:19 11:1,8 12:22 17:22 23:12,20 26:1 34:23 39:7 42:9 54:11 57:15,22 105:19 106:6 107:16 109:6 190:16 231:23				
Z				
Zamitt 85:19 86:2 Zoom 149:16				
0				
07.50 106:16 107:5				
1				
1 85:10 110:8,9				
		2		
		2.10 192:3 2.30 173:11 2.94 77:10 20 28:1 51:18 53:5 53:13 54:25 66:11 95:10 98:11 115:12 204:23 205:10 207:1,3,4 20:57 202:21 2012 182:17 2018 152:16 160:7 160:9 2019 79:2,4,11 112:25 115:14 118:14 121:5,16 121:24 124:19 129:12 130:18 155:22 156:1,2 156:16 157:3 160:2 161:2,3 184:22 2020 16:1 17:24 56:20 83:22 89:8 96:2 106:8 115:15,16 116:21 131:12,18 135:3 138:6 147:24		
		3		
		3 147:24 149:9,10 176:16 3/133 193:16,17 30 131:17 140:14 178:22 179:7,23 300 216:5 31 140:15 166:1 3165 213:8 319 182:24 3199 165:3 320 187:3 3218 183:18 322 181:24 185:11 185:11 324 187:15 3243 182:23 3244 185:11 3245 187:20 3272 141:25		
			4	
			4 67:20 117:21 129:12 130:17 157:4 169:25 175:5 179:14,18 180:22 212:7 215:2 40 62:9 445 61:24 46 215:24	
			5	
			5 11:1 14:1 15:15 16:4,9,12 17:5 121:4,15 50 107:22,25 134:5 51 131:19 132:12 132:14,17 151:23 58 55:4	
				6
			6 79:13 98:10 135:3	

<p>60 55:14 61 55:22 63 56:18 58:14 209:5 64 56:24 65 56:18 58:14 66 5:3 68 202:18 6th 8:5,7,8,11,14 84:23</p> <hr/> <p style="text-align: center;">7</p> <p>7 1:12 2:11,13 67:22 162:20 163:3 180:17 212:5,9 72 162:14 76 133:9 151:13 160:8 162:15 77 160:19 79 160:1 7th 3:24 7:22 8:15 8:16,18 9:6,18 84:24</p> <hr/> <p style="text-align: center;">8</p> <p>8 106:8 149:16 164:2 166:2,15 176:17 215:22,24 216:2 8:17 196:9 84 118:16 119:11</p> <hr/> <p style="text-align: center;">9</p> <p>9 3:21 55:6 96:1 105:17 180:17 181:5 9.4 189:25 98 183:13 99 183:12 9th 97:1 98:10</p>				
--	--	--	--	--