

1
2 (Friday, 26 April 2024)
3 (10.00)
4 MICHAEL LLAMAS
5 Questioned by MR SANTOS (Continued)
6 MR SANTOS: Good morning, Mr Llamas.
7 **A. Good morning.**
8 Q. We are going to turn to your
9 communications with Hassans and Mr
10 Baglietto, KC. Can I please ask you what
11 your relationship with Mr Baglietto KC is?
12 **A. Mr Santos, just one clarification I'd like**
13 **to make in relation to something that I said**
14 **yesterday by me, please?**
15 Q. Yes.
16 **A. It is that I have been reminded after the**
17 **hearing yesterday that the 5 June letter was**
18 **written by my lawyers for me on the basis of**
19 **a factual timeline that I have provided to**
20 **them. I just wanted to make that clear,**
21 **contrary to what I said yesterday that I had**
22 **drafted it myself.**
23 Q. Yes. Who has reminded you of that?
24 **A. My lawyer.**
25 Q. Your lawyer. When you say your

Page 1

1 lawyers drafted it, who -
2 **A. My lawyer, sorry.**
3 Q. Who were your lawyers at the time, from
4 within your office or your -
5 **A. No, not from within my office.**
6 Q. Turning back to your communications
7 with Mr Baglietto, what is your relationship
8 with Mr Baglietto?
9 **A. Generally, he, Lewis Baglietto, has been**
10 **a very good friend of mine for a very long**
11 **time.**
12 Q. How often do you message him?
13 **A. It depends. Not a terrible amount. We**
14 **message but it depends on - it varies.**
15 Q. Would you message over personal
16 matters as well or just -
17 **A. Yes, especially, I would say.**
18 Q. If we can turn, please, to C6883, these are
19 the message exchanges on WhatsApp
20 between you and Mr Baglietto on 13 May
21 and we can see that at 3.32 in the afternoon
22 there is a message from Mr Baglietto that
23 says, "M, can I call you?" and then at 6.39
24 and 6.48 there are two missed calls. I think
25 your evidence yesterday was that you

Page 2

1 believed there was a call on that date?
2 **A. Yes, during the meeting with Mr**
3 **McGrail. It's in the transcript.**
4 Q. What was discussed on that call?
5 **A. I'm not even sure whether I took it myself**
6 **or whether he called my PA but the message**
7 **was that he had written. I think it was**
8 **seeking a follow-up to his letter of the**
9 **previous night.**
10 Q. Sorry, and you say that the message was
11 that he had written. Is that a reference to the
12 further letter?
13 **A. I think it's because he was asking - in the**
14 **transcript he was asking that we should read**
15 **a letter he had just sent - might have been the**
16 **letter he sent to Paul Richardson.**
17 Q. Yes, I think that's the one that arrives
18 during the meeting. Did you discuss with
19 him the meeting that you had had with the
20 police, the DPP and Mr DeVincenzi later that
21 day or at the time??
22 **A. Yes, I think - I've been trying to retrace**
23 **this through to try to get as accurate a**
24 **memory of this. I think I must have called**
25 **him after the meeting of 13 May and possibly**

Page 3

1 **because I had two missed calls from him, so I**
2 **think it's highly likely that I called him after**
3 **the meeting - after those missed calls, I**
4 **suppose.**
5 Q. Sorry, did you disclose to him anything
6 that had been discussed in that meeting with
7 the police, the DPP and Mr DeVincenzi?
8 **A. Not particularly other than we were going**
9 **to - we were not impressed about the**
10 **allegations of misfeasance and abuse of**
11 **power, but that is all. What I think he told**
12 **me then that Mr Levy would almost certainly**
13 **give a no comment interview. I think that**
14 **message was delivered by him to me on that**
15 **call, but that is all I remember of that call. It**
16 **was very general, but those messages were**
17 **passed.**
18 Q. If we go to C3522, please, this is the
19 document we looked at yesterday, the
20 voluntary attendance for police interview
21 under caution and we looked at point 9.
22 Your evidence yesterday was that Mr
23 Baglietto sent that to you in the email of 12
24 May. We have seen that and I think your
25 evidence yesterday was that you had not

Page 4

<p>1 discussed that document with Mr Baglietto?</p> <p>2 A. Yes.</p> <p>3 Q. Did you discuss that document with the</p> <p>4 Chief Minister?</p> <p>5 A. No.</p> <p>6 Q. Can we now turn to C806, please? These</p> <p>7 are the message exchanges between you and</p> <p>8 Mr DeVincenzi that we were looking at</p> <p>9 yesterday and I just want to focus on the final</p> <p>10 two on 14 May at 12.30 and at 12.45. Those</p> <p>11 are messages from Lloyd DeVincenzi saying,</p> <p>12 "Lewis and another gent here to see you",</p> <p>13 and then Moshe Levy is the other gentleman.</p> <p>14 Did a meeting take place between you and</p> <p>15 Mr Baglietto and Moshe Levy?</p> <p>16 A. I am virtually certain that it didn't.</p> <p>17 Q. That it didn't. Why do you say that?</p> <p>18 A. Firstly because I don't recollect that</p> <p>19 meeting at all. Secondly, I don't recall</p> <p>20 meeting with Moshe Levy at all and thirdly, I</p> <p>21 provided to my legal team a - I mean, when I</p> <p>22 saw this and I provided the WhatsApp</p> <p>23 exchange to the inquiry, I was very puzzled</p> <p>24 because I couldn't remember such a meeting.</p> <p>25 So, I've been trying to think what was</p> <p style="text-align: center;">Page 5</p>	<p>1 completely different matters, yes.</p> <p>2 Q. Yes. Did you meet with Mr Baglietto on</p> <p>3 another day in relation to this?</p> <p>4 A. Yes, on the evening of the 15th.</p> <p>5 Q. The evening of the 15th. I think we will</p> <p>6 turn to that shortly. C6883 next, please.</p> <p>7 These are back to the messages with Mr</p> <p>8 Baglietto and at the evening of 14 May,</p> <p>9 which appears from your evidence to be a</p> <p>10 further message after they had turned up at</p> <p>11 your office but you had not met. He says,</p> <p>12 "M, we are delayed with letter to you until</p> <p>13 morning." "No problem, L" is your response,</p> <p>14 "M." Had you discussed that letter during</p> <p>15 the course of the day?</p> <p>16 A. No, I've got no recollection at all of that.</p> <p>17 Q. If we go to B5419, this is the letter that is</p> <p>18 sent on 15 May and in the introduction</p> <p>19 section, second paragraph says, "We set out</p> <p>20 in outline below the reasons why there are</p> <p>21 very good grounds for believing that the</p> <p>22 warrants were improperly procured and</p> <p>23 wrongfully granted." Did you discuss this</p> <p>24 letter at all before it was sent with Mr</p> <p>25 Baglietto?</p> <p style="text-align: center;">Page 7</p>
<p>1 happening and my PA reminded me that my</p> <p>2 son, my son Pierre, was with me in the office</p> <p>3 in Gibraltar so I looked at my WhatsApp chat</p> <p>4 with him and there is a WhatsApp message</p> <p>5 that I sent to him at 1253 saying that I'm</p> <p>6 going to go and pick him up. So, if you look</p> <p>7 at the second message from Mr DeVincenzi,</p> <p>8 that's at 1245. At 1253 I'm sending a</p> <p>9 message to my son telling him that I'm going</p> <p>10 to go and pick him up, so even on the</p> <p>11 assumption that I may have turned up at</p> <p>12 1245, which is not clear from this, there will</p> <p>13 have been a gap of eight minutes before I</p> <p>14 was messaging my son telling him that I was</p> <p>15 going to go and pick him up.</p> <p>16 Q. Would you be prepared to disclose that</p> <p>17 message suitably redacted with no personal</p> <p>18 information?</p> <p>19 A. It's with my lawyers.</p> <p>20 Q. Thank you. You said you do not recall</p> <p>21 meeting Moshe Levy. Are you saying you do</p> <p>22 not recall ever meeting Moshe Levy or you</p> <p>23 do not recall meeting him in relation to this</p> <p>24 matter?</p> <p>25 A. In relation to this matter. I've met him on</p> <p style="text-align: center;">Page 6</p>	<p>1 A. Not at all.</p> <p>2 Q. Further down the page, the final sentence</p> <p>3 says, "There can be little surprise that as we</p> <p>4 believe is the case, the DPP advised the</p> <p>5 Commissioner against the making of these</p> <p>6 applications." Had you told Mr Baglietto</p> <p>7 that the DPP had advised the Commissioner</p> <p>8 against the making of these applications?</p> <p>9 A. Not at all.</p> <p>10 Q. Do you think it is proper for a suspect to</p> <p>11 be informed as to the DPP's advice on</p> <p>12 executive action taken against them?</p> <p>13 A. I guess not.</p> <p>14 Q. Do you know who informed Hassans of</p> <p>15 that?</p> <p>16 A. No.</p> <p>17 Q. During the course of the meeting that you</p> <p>18 had on 15 May there is an exchange where</p> <p>19 you surmise that it may have emerged from</p> <p>20 the conversation between the Chief Minister</p> <p>21 and Mr McGrail. Did you believe at the time</p> <p>22 that the Chief Minister had passed that</p> <p>23 information?</p> <p>24 A. As you say, I was surmising.</p> <p>25 Q. If we can now look at some iMessages</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 that were disclosed by Mr Baglietto to the 2 inquiry recently, I do not have the bundle 3 reference, but they will appear on screen. I 4 just want to focus on the one on 15 May at 5 7.29, "M, I was asked to come over to your 6 office." Who asked Mr Baglietto to attend 7 your office? 8 A. I do not know, and I'm just wondering 9 whether my PA may have called his PA. I 10 don't know. 11 Q. Would the Chief Minister ask him to do 12 that? 13 A. I don't know. 14 Q. Did you meet that evening? 15 A. I think that's the evening we met, yes. 16 Q. This was after this letter had been sent on 17 15 May. What was discussed at that 18 meeting? 19 A. The meeting of 15 May, if I remember 20 correctly, is the meeting which starts when I 21 say fairly early on in the meeting that we are 22 led to believe that Mr Levy is going to make 23 a "no comment" interview on the 18th. We 24 then discussed the letter that we had 25 received, and that was the start of a process</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. Well, on that day you would not have 2 been able to tell them about the meeting on 3 that evening because you have -- 4 A. Yes. So, the next meeting was on the 5 20th, I think. I can't remember whether I told 6 them that I had met him, but I certainly told 7 them that I had spoken to Mr Baglietto, and 8 if I did meet him, I would add, it would have 9 been a very short meeting to tell him what 10 the RGP were prepared to accept and not 11 much more. 12 Q. What did you consider your role to be in 13 terms of your discussions with Hassans and 14 with the RGP? Were you lawyer to the 15 government, lawyer to the Chief Minister, 16 were you a negotiator, mediator? 17 A. I think I was trying to manage a situation, 18 which had the - Mr McGrail, I think rightly 19 asked to see me on the 13th because of the 20 nature of the allegations made in that first 21 letter from Hassans on the 12th. We then 22 received this other letter, which also 23 contained very serious allegations, and we 24 were working together to deal with the letters 25 and to deal and discuss, and agree the best</p> <p style="text-align: center;">Page 11</p>
<p>1 where we knew that that was coming, and 2 that we were going to start looking for an 3 alternative way to get evidence from Mr 4 Levy. 5 Q. Why did you meet in person if you were 6 already in written communications with each 7 other? 8 A. Yes, I was wondering about that, and I 9 think that was a Friday, wasn't it, 15 May? 10 Q. I believe it was, yes. 11 A. I think - if I remember correctly, Mr 12 Baglietto was going to Mr Levy's house 13 because it was Sabbath - just before Sabbath 14 - and my office is just next door, so he might 15 have popped in for that. 16 Q. But he was asked to attend your office, it 17 seems from the message? 18 A. Yes, but as I say, I don't know what is the 19 source of that - asking to come over to see 20 me. 21 Q. Did you tell the RGP that you had met 22 Mr Baglietto? 23 A. Yes. We had spoken openly about 24 contact with Mr Baglietto during that day's 25 meeting.</p> <p style="text-align: center;">Page 10</p>	<p>1 way forwards so I was just part of that. A lot 2 of these letters were being addressed to me, 3 as well. I mean, that's the role I was playing 4 is - look, we were agreeing a strategy in the 5 meetings, and I was simply transmitting that 6 to Mr Baglietto so that they would then act 7 accordingly. 8 Q. Did you consider that you were 9 sufficiently at arm's length from Mr Baglietto 10 given your personal relationship? 11 A. Completely. 12 Q. The Chief Minister gives evidence of a 13 meeting that he had with Mr Baglietto and 14 Mr Levy at the Chief Minister's home on 17 15 May, that was on the Sunday. Did the Chief 16 Minister tell you about that meeting? 17 A. No. I became aware of that in the 18 evidence. 19 Q. Through the inquiry? 20 A. In the inquiry, yes. 21 Q. Are you concerned about the 22 appropriateness of the Chief Minister 23 arranging to meet with a suspect in a criminal 24 investigation, a live criminal investigation? 25 A. I think that's a matter for him.</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 Q. At C6, 883 there are further missed calls 2 from Mr Baglietto on 20 May. Did you 3 speak to him on that day? 4 A. Yes, I think I did because that call, the 5 missed call, is at 13.43. I think the meeting 6 of the 20th was at one. 7 Q. I think that is right. 8 A. And I almost certainly called him after 9 the meeting, and I called him to tell him, 10 effectively, that we were not impressed by 11 what they had done in their last letter - I 12 don't know which one of the letters it was - 13 where they came back recording - I mean, I 14 had told them on the 15th that the RGP was 15 prepared to accept a written statement, and 16 then the letter that came, the next letter that 17 comes back from Hassans, refers to a witness 18 statement. So, I remember that on the 20th 19 we were all very angry with that because that 20 is not what I had told them, and then I would 21 have called him to tell him as much. 22 Q. And the letter that comes on 20 May is at 23 B5, 443. 24 A. I think it is in the first paragraph, isn't it? 25 Q. Sorry, I did not catch that?</p> <p style="text-align: center;">Page 13</p>	<p>1 permission, "Is it a good idea?". I mean, it's 2 in the transcript. "Do you think I should call 3 Lewis or should somebody else be calling 4 Lewis?" I mean, I think it was - well, there 5 was certainly total transparency. 6 Q. If we can turn to B3, 346. This is, I 7 think, perhaps the email that you were 8 referring to that says, "Further to 9 confirmation that the Commissioner would 10 be content with a written statement". 11 A. Sorry, it's not that one. There was one 12 letter where they say, "Witness statement", 13 which was the subject matter of the meeting 14 with Mr McGrail on the 20th. That's the one I 15 was referring to before. 16 Q. We will try and find that in the meantime. 17 Can we now go to B1, 418, please. Sorry 18 about this, but we have got B5, 439. 19 A. Yes, that's the one. 20 Q. That is the one, yes, and you say that at 21 that point, that did not reflect anything that 22 had been said or sent to Hassans? 23 A. Absolutely not. I told them a written 24 statement, and the written statement had 25 become a witness statement.</p> <p style="text-align: center;">Page 15</p>
<p>1 A. No, sorry, I was just trying to find where 2 it is that they say, "Witness statement". 3 Q. I see. Did you discuss the contents of this 4 letter with Mr Baglietto before it was sent? 5 A. No, no, I didn't discuss any content of 6 any letter with Mr Baglietto. 7 Q. Given that you were advising the RGP on 8 how to respond to these letters, do you 9 consider that it was, nevertheless, appropriate 10 for you to be in separate communication with 11 Mr Baglietto? 12 A. Mr Santos, my contacts with Mr 13 Baglietto were agreed in the meetings with 14 Mr McGrail and Mr Richardson. It was very 15 transparent. I mean, I was just - it was part 16 of my role to manage that, and the 17 communications that I had was to manage the 18 situation. That's all I was doing. There was 19 no particular discussion. It's, "Look, the 20 RGP has decided that that they'll accept a 21 written statement", and little else. 22 Q. My next question was going to be, were 23 you fully transparent with the RGP as to 24 what you were discussing with Hassans? 25 A. Absolutely. I mean, I was asking for</p> <p style="text-align: center;">Page 14</p>	<p>1 Q. We were going to go to B1, 418. These 2 are WhatsApp exchanges between you and 3 the Chief Minister on 17 May, towards the 4 top of the page. This is the day on which Mr 5 Levy and Mr Baglietto attend the Chief 6 Minister's home to meet him, and that 7 evening the Chief Minister sends some media 8 to you. We know that that is the HMIC 9 report, and he says, "That is page 13 of the 10 HMIC report published last week. Look at 11 the bit I have highlighted in red. Boom", and 12 you say, "Hardly encouraging. I understand 13 that technical experts can say when a phone 14 has been accessed or otherwise tampered 15 with." Just to show you the page - of course, 16 you disclosed this page to the inquiry, but 17 just to remind you of this, it is at C6, 761, 18 and a highlighted part in terms of - it is a 19 section, "Investigative support" and the 20 underlined words are, "We found them using 21 their personal devices to examine offenders' 22 phones. This isn't good practice and doesn't 23 meet best evidence standards." What was 24 your understanding as to why the Chief 25 Minister was sending you this?</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

1 **A. None in particular other than - that's**
 2 **when, the 18th?**
 3 Q. That is the 17th, that you meet.
 4 **A. The 17th. I mean, I knew in what frame**
 5 **of mind the Chief Minister was in relation to**
 6 **Mr McGrail after the lying of 12 May, so I**
 7 **just - I mean, I didn't pay any particular**
 8 **attention to it other than he was sending it to**
 9 **me. As you can see, I don't particularly**
 10 **engage in that conversation.**
 11 Q. But did you understand that to be a
 12 reference to the search warrant of Mr Levy?
 13 **A. No, not particularly.**
 14 Q. Notwithstanding what you say about, "I
 15 understand that technical experts can say
 16 when a phone can be accessed or otherwise
 17 tampered with"?
 18 **A. True, I may have read it that way,**
 19 **absolutely. It's a long time ago, Mr Santos,**
 20 **so - but yes, I accept that my reply seems to**
 21 **indicate that. That was the great concern at**
 22 **the time.**
 23 Q. At the time. If we then go to 18 May
 24 2020, actually, these are messages that are
 25 sent after midnight, 35 minutes past

Page 17

1 midnight, between 35 minutes past midnight
 2 and eight minutes to one in the morning, so it
 3 is later that same evening, and the Chief
 4 Minister sends you a message to discuss, and
 5 then there is some media omitted, but we
 6 have that too. That is at C6, 763, and what
 7 he has sent you is section 59 of the
 8 Constitution, and just picking up 59(2)(b), it
 9 says, "Attorney-General shall have power in
 10 any case in which he considers it desirable so
 11 to do - to take over and continue any such
 12 criminal proceedings that may have been
 13 instituted by any other person or authority".
 14 If we go back to B1 418, the answer that
 15 comes from you is "(2)(b)?" So, you seem
 16 to be referring to that provision and the
 17 answer that comes back from the Chief
 18 Minister is, "Exactly, in re a search warrant
 19 as a proceeding", and you say, "We need to
 20 check what 'such' means in that context."
 21 "Such" - I think the reference to "such" is in
 22 59(2)(b): "to take over and continue any such
 23 criminal proceedings". What were you
 24 discussing with the Chief Minister at that
 25 point?

Page 18

1 **A. Well, I mean this was a completely**
 2 **unsolicited message that I got from the Chief**
 3 **Minister. I assumed that what he was,**
 4 **perhaps, suggesting is whether this power**
 5 **was available to me, but as you can see, the**
 6 **exchange is very short and as you know it is**
 7 **something that I never did at all, and I just**
 8 **didn't take account of anything about that,**
 9 **because I didn't think it was necessary for me**
 10 **to do so, and for those who allege that I'm the**
 11 **Chief Minister's wing man, this is one**
 12 **example that I would give to the contrary**
 13 **effect.**
 14 Q. So, did you understand this to be the
 15 Chief Minister proposing that you take over
 16 the proceedings in accordance with 59(2)(b)?
 17 **A. I don't know because I didn't discuss it**
 18 **with me(sic). I think it's an inference to**
 19 **make - I mean - from the exchange.**
 20 Q. Why did you refer to (2)(b) when you
 21 saw that?
 22 **A. Because when I saw it, I imagine that that**
 23 **is what he - that was the reason why he was**
 24 **sending it to me, considering the stage at**
 25 **which the investigation was at that moment**

Page 19

1 **in time.**
 2 Q. What would be the advantage of taking
 3 over criminal proceedings?
 4 **A. I don't know, Mr Santos. I didn't give it**
 5 **much thought, because it's something that I**
 6 **wasn't contemplating of doing at all.**
 7 Q. Did you consider that the Chief Minister
 8 was seeking to influence your exercise or
 9 non-exercise of that power?
 10 **A. I don't know. You should ask the**
 11 **question to him. I certainly wasn't influenced**
 12 **by it.**
 13 Q. You have touched upon this, but I just
 14 want to make things clear. His first message
 15 says, "to discuss". Did you have any
 16 discussions about this?
 17 **A. None, at all.**
 18 Q. When you say, "We need to check what
 19 'such' means in that context", you do not
 20 appear to be disagreeing with the Chief
 21 Minister's proposal. Is that correct?
 22 **A. It's just a reply. It's 10 to one in the**
 23 **morning, you know. I wasn't going to**
 24 **engage in any particular discussion.**
 25 Q. Were you discussing also exercising the

Page 20

<p>1 power in 59 (2)(c)? 2 A. Not at all. 3 Q. What would be the purpose of taking 4 over the proceedings if not to exercise the 5 power at 59(2)(c)? 6 A. Absolutely. 7 Q. If we can go to A3, 07, please, this is 8 paragraph 38 of your second affidavit, and 9 the paragraph there you say, referring to Mr 10 McGrail's evidence, "What he refers to at 11 para 58.29 is recorded at pages 53 to 54 of 12 the translated transcript. However, 13 consistently with what I have said in my first 14 affidavit, it is clear that the issue of stopping 15 the prosecution and/or the issuing of a nolle, 16 was raised by IM himself much earlier in the 17 meeting (and dismissed by me and DPP) and 18 this is set out at page 12 of the translated 19 transcript. I reproduce below the relevant 20 parts of the transcript." There is that 21 exchange where Mr McGrail says, "Well 22 then, who stops it?", and he says earlier than 23 that, "I cannot pull it, you can, you can, 24 Michael". So, in your evidence you rely on 25 the fact that Mr McGrail raised the option of</p> <p style="text-align: center;">Page 21</p>	<p>1 example it included that the Chief Minister's 2 evidence was very important, and there was a 3 clear indication from the defence that they 4 would be asking the Chief Minister to give 5 live evidence at trial. Further down at 6 number 4, there is reference to the Financial 7 Secretary having provided statements in the 8 case, disclosure regarding communications, 9 and it says, "Unfortunately the defence will 10 of course raise the beneficial ownership 11 issue", and then the final paragraph on that 12 page says, "I hope the above gives you a 13 flavour of the issue and matters that are 14 coming to the fore, and most of which have 15 been raised by counsel for Messrs Perez and 16 Cornelio in their letter, which has been 17 copied to you asking for you to consider 18 whether this matter should proceed. You've 19 also been provided with a copy of my 20 response" and he does say, for completeness, 21 over the page, "Finally I would say that there 22 is nothing in the communications that I have 23 seen in relation to the CM or FS that concern 24 me." I understand that you are not prepared 25 to reveal the reasons for the nolle, and I'm</p> <p style="text-align: center;">Page 23</p>
<p>1 a nolle with you. Is it not fair to say that the 2 Chief Minister had, effectively, raised the 3 question of a nolle with you by a message? 4 A. I (inaudible) - certainly no connection. I 5 mean, I completely forgot that exchange 6 because it was not something I considered 7 relevant. So, I've never made any connection 8 between Mr McGrail's offer in the meeting of 9 the 13th and the message from the Chief 10 Minister. 11 Q. Sorry, just to clarify one point about this, 12 just back on that, C6, 763, when the Chief 13 Minister sent you this, why did you 14 immediately think he was referring to 15 59(2)(b) and not 59(2)(c), for example? 16 A. I don't know. Well, as I said just now, 17 I'm just assuming it was because I thought 18 that that power was potentially the most 19 relevant one to the investigation at that 20 moment in time. It's just an assumption that I 21 made. 22 Q. If we can go to C5, 871, please, this is an 23 email sent by the DPP to you in March 2021, 24 and where the DPP sets out matters that had 25 been highlighted by defence counsel. For</p> <p style="text-align: center;">Page 22</p>	<p>1 not asking you to do so, but are you willing 2 to confirm on oath that the matters mentioned 3 in that email were not the reason for and did 4 not lead to your decision to discontinue? 5 A. I confirm on oath that those reasons have 6 absolutely nothing to do - for the reasons for 7 my nolle. Also bear in mind, that is an email 8 of 8 March 2021, and I didn't enter the nolle 9 until January 2022. 10 Q. And in your second affidavit, your 11 position is that the decision to enter the nolle 12 was based on matters brought to your 13 attention a year after Mr McGrail's 14 retirement. 15 A. An email I received from the DPP on 7 16 May 2021, which attached are reports from 17 one of his Crown Counsel. 18 Q. In evidence yesterday, Mr DeVincenzi 19 said that he recalled you at one point, not 20 long after 7 April meeting, referring to the 21 RGP as "payasos", or clowns in the context 22 of their handling of the investigation. Do 23 you accept that you used that description? 24 (9.35) 25 A. I don't remember it, but if he has</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 mentioned it, I assume it's true, and I would 2 publicly like to apologise to those who I 3 addressed that comment to at the time. I 4 must say that it's a bit unfair of Mr 5 DeVincenzi to have said that the way he said 6 yesterday, because when we talk amongst us, 7 often we use descriptions such as that, which 8 don't particularly mean what we are saying. 9 It could be exasperation or whatever. I 10 thought it was a bit unfair for him to have 11 highlighted that yesterday.</p> <p>12 Q. Turning to what we call issues 8 to 10, 13 your evidence in your first witness statement 14 at 6(a), which is at A270, is that you have no 15 statutory or constitutional role in relation to 16 the retirement resignation or removal of the 17 Commissioner of Police.</p> <p>18 A. Thank you.</p> <p>19 Q. Paragraph 6(a), but I am paraphrasing 20 that you say that you have no statutory role in 21 that process and that you did not take part in 22 any of the decisions and that your 23 participation was limited to just three 24 interactions that you set out in your 25 statement. Would it be fair to say that you</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. Which we will come to. Given your own 2 falling out with the Commissioner of Police, 3 did you feel that you should take a step back 4 from that process?</p> <p>5 A. Yes, possibly, and also because there is 6 no role for me in that process.</p> <p>7 Q. Is it fair to say that Mr Pyle's intention 8 was to either secure Mr McGrail's retirement 9 through section 34 or invoke section 13 10 himself?</p> <p>11 A. I can't remember what Mr Pyle's mind 12 was at what particular date. I mean 13 obviously he was embarked on that at that 14 moment in time. I mean, that's all I 15 remember.</p> <p>16 Q. Was the Chief Minister's mind made up 17 by 12 May?</p> <p>18 A. Maybe, I don't know. Ask him. I don't 19 know. I can't remember.</p> <p>20 Q. But from your involvement, was the 21 process a fait accompli?</p> <p>22 A. Well, what I knew was what had 23 happened on 12 May, so I would be hardly 24 surprised if whatever it was that he was 25 discussing with Mr Pyle would also -- this</p> <p style="text-align: center;">Page 27</p>
<p>1 were nevertheless in contact with the Chief 2 Minister and the Governor throughout that 3 process?</p> <p>4 A. Very, very little. There was some contact 5 but it was very, very little. That was their 6 issue. I wasn't involved in that. I am sure 7 you will come to it. I think I was called on 4 8 June because of the procedural errors 9 committee.</p> <p>10 Q. We will come to that. We will come to 11 that.</p> <p>12 A. Yes.</p> <p>13 Q. Would it be fair to say that you acted as a 14 soundboard for the Chief Minister throughout 15 the process?</p> <p>16 A. Not even. Not even. He was dealing 17 with Mr Pyle on those matters. I'm not 18 saying that he didn't speak to me. I don't 19 exclude that possibility, but I wasn't part of 20 that.</p> <p>21 Q. What about Mr Pyle, did you act as a 22 soundboard for Mr Pyle?</p> <p>23 A. Not at all, until --</p> <p>24 Q. Apart from the 4th?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 26</p>	<p>1 incident would be mentioned and the lie in 2 particular.</p> <p>3 Q. But did you see that there was room for 4 Mr McGrail to explain himself, make 5 representations and preserve his --</p> <p>6 A. I don't know, Mr Santos. As I said, I 7 wasn't involved in that part.</p> <p>8 Q. On 14 May, the Chief Minister forwarded 9 you a message that he had sent to the Deputy 10 Governor, which set out a list of reasons for 11 starting to lose confidence in the senior 12 management of the RGP, that is at B1417. 13 This is 14 May at 9.49. He starts by sending 14 you a link to an article in El Faro de Ceuta 15 and he says, "This has appeared today." And 16 you say, "Couldn't make it up." Then he says 17 -- just actually jump over that. Over the page 18 he says, "Just sent to Deputy Governor." So 19 he is forwarding you this message that he has 20 just sent to the Deputy Governor and he says 21 the following on the previous page, "Hi, this 22 article has just appeared. A civil claim has 23 been filed in Spain in Ceuta by the families 24 of the deceased in the incident with the RGP 25 off the Eastside. This is obviously going to</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 cause us huge issues. Damages claims, 2 political problems, etc. I am totally there to 3 support the officers on the frontline. I am 4 starting to have huge concerns about the 5 senior management of the RGP. I will alert a 6 particular matter when we meet, but in terms 7 of the past few months alone ..." Then he 8 sets out five points. Then he says, "I think I 9 will be asking Ian McGrail to provide more 10 detail and in writing as to what happened 11 here and what they are going to do to engage 12 with these claims before there is any 13 requirement that they do so." That I think 14 culminates in a section 15 request. Then he 15 says, "I am starting to lose confidence here. 16 Best wishes, Fabian." 17 Why do you think that the Chief Minister 18 forwarded this message to you? 19 A. I don't know. It may be because we'd 20 been together on the 12th and he thought that 21 this was ... bear in mind what his frame of 22 mind was during these days, and my 23 comment on "You couldn't make it up", is 24 just because of the timing of the publication 25 because this is just two days after 12 May.</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. If we look at C3953 please, this is an 2 email exchange between the Chief Minister 3 and Mr Pyle. This is an email exchange 4 between the Chief Minister and Mr Pyle on 5 17 May 2020 where they are exchanging 6 their thoughts ahead of a meeting on the 7 following day with Dr Britto, the Chair of the 8 GPA and their reasons for their loss of 9 confidence. Were you aware of the Chief 10 Minister and the Governor's intention to 11 speak to Dr Britto at that point? 12 A. No. Certainly my recollection is not at 13 all. 14 Q. Did you see these email sat the time? 15 A. No, I think I have seen them for the first 16 time now, well, when I was preparing for the 17 Inquiry. 18 Q. When did you learn of the meeting 19 between the Chief Minister, Mr Pyle and Dr 20 Britto on 18 May? 21 A. I can't remember. 22 Q. Did you learn of it shortly thereafter? 23 A. I wouldn't be able to say. 24 Q. We know that the Chief Minister's 25 principal reason for losing confidence in Mr</p> <p style="text-align: center;">Page 31</p>
<p>1 As you can see, I don't engage in that 2 exchange at all. 3 Q. Was this the first time that the Chief 4 Minister shared his views with you about Mr 5 McGrail's role as Commissioner of Police or 6 did this message follow on from an earlier 7 conversation? 8 A. I don't think a conversation, but I think 9 the inference of the meeting of 12 May was 10 pretty obvious. 11 Q. And what was your -- you say that you 12 didn't engage, but what was your own ... did 13 it you react at any point to that message or 14 respond to it? 15 A. No, I don't recall at all reacting to that. 16 These are matters, Mr Santos, that I don't 17 even have particular knowledge about, like 18 the Federation bullying allegations, for 19 example. So, I didn't consider it was for me 20 to comment on that, on any of that. 21 Q. Did it strike you as odd that the Chief 22 Minister was saying there that he was starting 23 to lose confidence given what you had 24 witnessed on 12 May? 25 A. No.</p> <p style="text-align: center;">Page 30</p>	<p>1 McGrail was Operation Delhi. Given his 2 own personal investment in 36 North and his 3 communications with the suspect, did you 4 consider whether he was in a sufficiently 5 arm's length position to be engaged in this 6 process? 7 A. I leave those matters for him. I mean, 8 he's an intelligent man and it's a matter for 9 him. 10 Q. If we can go to B1419 please. This is 11 further on in your exchanges with the Chief 12 Minister. On 22 May there are four 13 messages where you say, "He hasn't turn up." 14 And the Chief Minister responds, "See your 15 email. The casual nature of his reply is just 16 remarkable." Then about 20 minutes later 17 you say, "Spoken to CoP. Call me when you 18 can." Then 12.30, "Call me when you can." 19 When you say, "He hasn't turned up", who 20 are you referring to at that point? 21 A. I don't know and it may be that I had a 22 meeting with Mr McGrail for that day. 23 When I was looking at this exchange the 24 other day, I seem to have seen something on 25 that. But I'm not sure.</p> <p style="text-align: center;">Page 32</p>

<p>1 Q. Can you work out why you would have 2 been meeting Mr McGrail on that day? 3 A. No, I have been thinking about it but I 4 can't remember why. 5 Q. The Chief Minister says, "See your 6 email" and says, "The casual nature of his 7 reply is just remarkable." Do you know what 8 email is being referred to there? 9 A. No, but I think it had to do with the 10 incident at sea and the communications. 11 Q. The one that we were looking at 12 yesterday, the legal claims. 13 A. Yes, possibly. 14 Q. In fact, we did consider that. The only 15 thing is it is a couple days later. 16 A. Yes, yes, I was just thinking the same 17 thing. He may not have sent Mr McGrail's 18 reply to me immediately, but I thought the 19 same thing. 20 Q. You then say that you'd spoken to the 21 Commissioner of Police. You don't know 22 what was said in that discussion I think is 23 your evidence. You can't recall what was 24 said between you and the Commissioner of 25 Police?</p> <p style="text-align: center;">Page 33</p>	<p>1 A. I thought it was the biggest flight of 2 fantasy I have ever read in my professional 3 career. 4 Q. Can you just explain briefly why you 5 think that? 6 A. Well, I mean the allegations that are 7 being made there are just completely absurd. 8 Q. If we go to B1419 please, back to your 9 exchanges with the Chief Minister, we are 10 jumping ahead to 4 June and there is an 11 exchange that says, "Let's meet 5.30 here 12 with Nick Pyle." You say, "Sure, he's here 13 with me. We can go earlier if you wish. 14 Doing a GBC interview first on tax treaty." 15 You say, "Okay." Do you recall what was 16 discussed at that meeting? 17 A. No, but in view of the dates, I think we 18 were aware or I was aware of the procedural 19 errors in the GPA decision making process. 20 Q. I was about to ask you about that. How 21 did you become aware of -- 22 A. I don't know. I can't remember. I've been 23 thinking about that. 24 Q. Would you have discussed it with Dr 25 Britto or Mr Neish?</p> <p style="text-align: center;">Page 35</p>
<p>1 A. During that call on the 22nd? Well, they 2 produced a one-sided transcript of that 3 conversation. 4 Q. This is the one that is recorded by Mr 5 Richardson? 6 A. Exactly, so, on the basis of the evidence 7 that I now see, it is clear that I must have 8 known that I'd received the letter from the 9 GPA and I felt sad about it. I mean, 10 notwithstanding everything that had 11 happened between us. You can see from the 12 transcript that it was quite an emotive 13 exchange between us, so that was the 14 purpose of the call. 15 Q. And you say "Call me when you can", 16 did you discuss Mr McGrail's -- 17 A. No, I don't remember discussing that. 18 Q. A letter was sent to you by Dr Britto on 19 29 May, C4619. If we just go over the page, 20 this is the letter from Gomez & Co of 29 21 May 2020. Did you discuss that letter with 22 Mr Pyle or with the Chief Minister? 23 A. I'm pretty sure I did, yes. 24 Q. What do you recall your thoughts about 25 that letter being?</p> <p style="text-align: center;">Page 34</p>	<p>1 A. Maybe. Maybe. Not with Mr Neish 2 because I don't think Mr Neish was 3 instructed at the time. 4 Q. The letter from TSN comes on 5 June, so 5 that's -- 6 A. Well maybe he was. I mean, I don't 7 remember. But I can't answer -- I've been 8 asking myself the same question and I think 9 it must have been Mr Britto who brought it to 10 my attention. 11 Q. If we can turn to C4727, this is an email 12 to you of 5 June from Nick Pyle, which you 13 respond to and Mr Pyle says, "I have 14 reflected on the discussion we had yesterday 15 afternoon on the issue of the Commissioner 16 of Police. My preferred course of action, 17 recognising the need to resolve this issue 18 quickly, not least in the light of media 19 scrutiny, is that I take no action until I have 20 seen the letters that the GPA Chair, the Chief 21 Minister and yourself are writing to the GPA 22 in response to the Gomez letter." So it does 23 look there as if you'd had a discussion as to 24 first of all the GPA process and what the next 25 steps should be on the previous day, on 4</p> <p style="text-align: center;">Page 36</p>

<p>1 June. Is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. And I think I am right in saying that this</p> <p>4 meeting is not mentioned in your witness</p> <p>5 statements. I think if we go to A270 --</p> <p>6 A. Yes, we don't need to go there. My first</p> <p>7 recollection, and certainly when I wrote my</p> <p>8 witness statement, that my first intervention</p> <p>9 in this process was on 5 June. So there was</p> <p>10 obviously a discussion on the 4th which I had</p> <p>11 forgotten about.</p> <p>12 Q. The 4th. If we can go to C4725 please,</p> <p>13 this is a message from Mr Pyle to the FCO</p> <p>14 and he says, "As discussed yesterday, things</p> <p>15 have taken a turn for the worse."</p> <p>16 A. Sorry, I don't have it in front of me.</p> <p>17 Q. Sorry, apologies. It is a message from</p> <p>18 Nick Pyle to the FCO, we just have it now on</p> <p>19 screen.</p> <p>20 A. Yes.</p> <p>21 Q. At line 54 on 5 June:</p> <p>22 "As discussed yesterday, things have taken a</p> <p>23 turn for the worse. The AG told me</p> <p>24 yesterday the Gibraltar Police Authority</p> <p>25 meeting that was held last week to consider</p> <p style="text-align: center;">Page 37</p>	<p>1 to take a considered and reflected decision. I</p> <p>2 think this is important, not least to</p> <p>3 demonstrate to the Commissioner that I have</p> <p>4 taken all representations into account one</p> <p>5 final time. The AG agrees with this</p> <p>6 approach."</p> <p>7 Does that accurately record your advice to</p> <p>8 Mr Pyle on 4 June?</p> <p>9 A. I think so, yes.</p> <p>10 Q. And it does seem from this that before the</p> <p>11 letter comes in from the GPA, you were</p> <p>12 already aware that there were procedural</p> <p>13 flaws and the GPA --</p> <p>14 A. Yes.</p> <p>15 Q. -- was going to take the view that it</p> <p>16 wouldn't ... couldn't --</p> <p>17 A. Yes.</p> <p>18 Q. -- couldn't proceed. So, in terms of 5</p> <p>19 June meeting, which is the following day,</p> <p>20 you say that you attended as the Governor</p> <p>21 and the Chief Minister's legal adviser to</p> <p>22 discuss an issue that had arisen in relation to</p> <p>23 procedural errors. That is your evidence. It</p> <p>24 does appear as though actually that</p> <p>25 discussion may have taken place on 4 June.</p> <p style="text-align: center;">Page 39</p>
<p>1 the position of the Commissioner of Police</p> <p>2 was not quorate. Its deliberations are</p> <p>3 therefore null and void and the Chair of the</p> <p>4 GPA should therefore not have called for the</p> <p>5 Commissioner of Police to resign. I should</p> <p>6 get a letter this morning from the Chair</p> <p>7 informing me of this. The AG advised there</p> <p>8 is no point in looking to appoint new GPA</p> <p>9 members as they are chosen by the Public</p> <p>10 Services Commissioner from a list proposed</p> <p>11 by the CM and I. They are then appointed by</p> <p>12 the Governor. Any new GPA members</p> <p>13 would therefore likely be perceived as</p> <p>14 biased, not least by a court. This leaves</p> <p>15 section 13(1)(f) of the Police Act as the only</p> <p>16 way forward to secure the resignation of the</p> <p>17 Commissioner should it be determined that</p> <p>18 this is the best way forward. The relevant</p> <p>19 sections of the Police Act are attached."</p> <p>20 He then attaches letters, and taking the</p> <p>21 second line of the next paragraph:</p> <p>22 "My intent at the moment is to ask to see</p> <p>23 those letters before summoning the</p> <p>24 Commissioner. I would therefore have all</p> <p>25 the relevant information to hand to enable me</p> <p style="text-align: center;">Page 38</p>	<p>1 A. An initial discussion. I can't remember</p> <p>2 the chronology. Now, whether we spoke</p> <p>3 about the same issue, namely the procedural</p> <p>4 errors on the 4th or the 5th or indeed both.</p> <p>5 Q. Yes. And there are no notes of either</p> <p>6 meeting, the 4th or 5 June?</p> <p>7 A. No.</p> <p>8 Q. If we go to B1420 please. Just at the top</p> <p>9 of that page, this is 5 June at 1.40, the Chief</p> <p>10 Minister says, "Any news from GPA?" You</p> <p>11 say, "No." He says, "FFS." Then you say,</p> <p>12 "They started a meeting at midday." "Ah,</p> <p>13 okay." So were you asked by the Chief</p> <p>14 Minister to keep tabs on the GPA meeting?</p> <p>15 A. No. I think we'd been discussing it and</p> <p>16 we wanted to see what the outcome of that</p> <p>17 meeting was.</p> <p>18 Q. Then on 5 June, the GPA informed Mr</p> <p>19 Pyle of the flawed process. That is at C4743.</p> <p>20 The final paragraph says:</p> <p>21 "We have taken independent legal advice and</p> <p>22 have been advised that the process which we</p> <p>23 have adopted under section 34 of the Police</p> <p>24 Act is fundamentally flawed and should be</p> <p>25 withdrawn. However, we are also advised</p> <p style="text-align: center;">Page 40</p>

<p>1 that the complaints by you and the Chief 2 Minister remain live and have to be 3 determined. We have also been advised that 4 the Authority as presently constituted is 5 vulnerable to challenge on the grounds of 6 bias. The Authority considers that as present 7 constituted, it is unable to process the 8 complaints without being vulnerable to legal 9 challenge and is therefore not prepared to do 10 so." 11 I should just correct myself, this letter does 12 come from the Gibraltar Police Authority as 13 you said, and not from TSN. If we then turn 14 to 4796, please, I just want to show you this 15 before I ask you my question, this is your 16 email to Mr Pyle on 5 June 2020 at 4.46. 17 You advise him on the response to that letter. 18 Your final two paragraphs say: 19 "Accordingly, the position is one where 20 neither the current GPA nor any newly 21 constituted GPA can discharge or perform its 22 responsibility under section 34 of the Polie 23 Act. I therefore consider that the current 24 situation is one which falls within section 13 25 of the Police Act. Section 13 provides that a</p> <p style="text-align: center;">Page 41</p>	<p>1 exercising one of the other powers under 2 section 13? 3 A. I may have. I can't recollect. 4 Q. Did you consider suggesting that external 5 advice be obtained given, for example, your 6 own loss of confidence, loss of trust in the 7 Commissioner? 8 A. Firstly, I knew he was getting legal 9 advice from the Foreign Office as well, so I 10 knew that channel was being used. And 11 secondly, on the question of perception of 12 bias, it seemed to be quite obvious, the point 13 that the GPA could not appoint new members 14 because of the fact that the Chief Minister 15 and the Governor are those who are involved 16 in that process. 17 Q. On the same day, you and the Chief 18 Minister both sent letters to the Gibraltar 19 Police Authority. At C4757, we have the 20 final page of your letter, and I just want to go 21 to the bottom of that letter, the penultimate 22 paragraph, picking it up from three lines 23 from the top: 24 "Nothing that I have ever said to the CoP or 25 any other member of the RGP has been even</p> <p style="text-align: center;">Page 43</p>
<p>1 series of powers are exercisable by the 2 Governor where the GPA has failed to 3 discharge or perform a responsibility 4 imposed on the GPA under the Police Act. 5 One such power is the power to suspend 6 from duty or call for the resignation of the 7 Commissioner. My advice is that in the 8 circumstances of the case, that power is 9 available to you if you were to decide to avail 10 yourself of it." 11 So, your position there was that section 13 of 12 the Police Act was activated. Does that 13 remain your position today? 14 A. Yes, I mean I didn't have the relevant 15 paragraph on screen. 16 Q. I am sorry. 17 A. But I remember that letter quite -- that 18 email well. 19 Q. It is now there. 20 A. Yes. And yes, that's my position. 21 Q. Were you aware at the time that the 22 Governor was minded to exercise that power 23 under section 13(1)(f)? 24 A. I was just giving him advice. 25 Q. Did you discuss with the Governor</p> <p style="text-align: center;">Page 42</p>	<p>1 remotely open to the possible 2 misinterpretation that I have advised or 3 encouraged, still less that I have interfered to 4 bring about or tried to bring about the 5 curtailment of the investigation, how it is 6 carried out by the RGP or to prevent any 7 person from being charged. It is 8 outrageously wrong and unfair for the CoP to 9 allege that I have let alone that I have done 10 so repeatedly over an extended period of 11 time, and I am shocked and deeply resent that 12 he has done so. This necessarily deepens my 13 loss of confidence in him going forward." 14 Can you just explain, unless you feel that that 15 is encapsulated entirely, why the 29 May 16 letter had deepened your loss of confidence? 17 A. Because of all the accusations that are 18 made in that letter. 19 Q. Given that you recognised, I think at the 20 beginning of this letter, in fact you recognise 21 that you did not have in fact -- in fact, the 22 second paragraph of the letter on 4754, you 23 say that you have no formal role under the 24 Police Act in relation to the matters currently 25 before the Authority for consideration. You</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 say, "Therefore, whilst my views about the 2 CoP are relevant only insofar as the 3 Authority wishes to have regard to them", 4 you cannot allow the record to stand 5 un rebutted. You provide a rebuttal of that. 6 Why did you feel it necessary to notify the 7 GPA of your loss of confidence in the same 8 letter? 9 A. Well, because I think if that is what the 10 Commissioner of Police thought of me on 29 11 May, as I say in that paragraph, I was not 12 going to let that sit and not provide my 13 position on the contents of that letter, and 14 there was a complete -- I mean, it was clear 15 that after 29 May and what is said in that 16 letter, there was just an impossible situation. 17 Q. In terms of the Chief Minister's response, 18 did you review the Chief Minister's 19 response? 20 A. I don't think so. 21 Q. What about Mr Pyle's letter of 3 June? 22 A. No, no. I haven't got any recollection of 23 that at all. 24 Q. Is it fair to say that this was a coordinated 25 response?</p> <p style="text-align: center;">Page 45</p>	<p>1 A. Please. 2 Q. It is on the preceding page, sorry, 4818. 3 Mr Pyle says: 4 "During our discussion, you handed to me a 5 copy of an email dated 5 June from Charles 6 Gomez to James Neish under the subject 7 'Invitation to retire'. I have now read that 8 email and note the final 14 words which state 9 'Our client feels he must apply for early 10 retirement from the Royal Gibraltar Police'. 11 The matter is, of course, directly relevant to 12 me as it is the Governor who, under section 13 32 ..." 14 And he explains the Governor's relevance. 15 He said: 16 "Before I review all the papers I have on this 17 matter in advance of our meeting on 18 Monday, can you please confirm to me by no 19 later than midday tomorrow whether that is 20 indeed your position and, if so, whether you 21 will be tendering your letter of resignation on 22 Monday with immediate effect." 23 Did you see this letter before it went out? 24 A. Not at all. 25 Q. Do you know why Mr Pyle referred to</p> <p style="text-align: center;">Page 47</p>
<p>1 A. Yes, I think that's correct. 2 Q. Were you aware that the Commissioner 3 of Police attended Mr Pyle's office to meet 4 later that day on the Friday? 5 A. I can't recollect. I knew that they were 6 meeting up, but I don't recollect now the 7 detail of that. 8 Q. And that they were planning to meeting 9 on the Monday, on the following Monday? 10 A. Maybe. Maybe I knew. 11 Q. If we go to C4819, here is Mr Pyle 12 forwarding to you and to the Chief Minister a 13 letter that he has sent -- sorry, an exchange 14 with Mr McGrail where he sent a letter on 6 15 June. That letter of 6 June was highlighting 16 the fact that in an email that Mr McGrail had 17 handed to him on 5 June from Charles 18 Gomez, there was a reference to him having 19 an intention to retire and Mr Pyle responded 20 saying, "Can you confirm that that is your 21 position", in a letter of 6 June which he then 22 forwards that exchange to you. Do you know 23 the letter that I am referring to -- 24 A. No. 25 Q. -- or shall I take you to it?</p> <p style="text-align: center;">Page 46</p>	<p>1 "resignation" rather than "retirement"? 2 A. Not at all. By this stage I was quite 3 removed from all this process and I know 4 and I knew that Mr Pyle was discussing with 5 legal advisers at the Foreign Office. 6 Q. If we jump ahead to C4823, five pages 7 down, there is an email from Mr Gomez to 8 Mr Pyle that then gets forwarded to you. 9 That is on the Sunday and there there is at the 10 end of that, there is the offer to retire on 11 terms to be agreed. If we then go to B1420, 12 there is an exchange between you and Mr 13 Pyle on 7 June that says at 12.30, "Nick, will 14 call you to arrange a time to meet." That is 15 just over half an hour after the message that 16 comes in from Gomez & Co. Did you meet 17 that evening to go through options with Mr 18 Pyle? 19 A. I think we did. Was that a Sunday? 20 Q. Correct, yes. 21 A. Yes, I think we did. 22 Q. What was discussed and what was -- 23 A. I can't remember. I can't remember 24 because, as I said, I was very distant from all 25 this process and I just saw my role there</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 really in relation to the procedural errors. I 2 was not particularly engaged in what was 3 happening at the time. I didn't consider that 4 it was a matter for me. 5 Q. If we can just go back to C4826, there 6 there is -- sorry, no, B1420, 8 June there is a 7 message from you saying, "Nick - I have just 8 read the exchange of emails between Darren 9 Grech and ourselves. I don't think what I am 10 being offered is what I deserve. There isn't 11 even a mention of my untaken leave and days 12 owed being paid to me. Could you revert to 13 Darren and enquire whether at least one 14 year's salary is honoured." 15 That appears to be a message, you 16 forwarding a message to the Chief Minister 17 from Mr McGrail to Mr Pyle. Do you 18 remember why this was being forwarded to 19 the Chief Minister? 20 A. Well, because if they are talking about -- 21 if Mr McGrail is talking about his financial 22 matters, this would ultimately go to the 23 Minister for Finance, who is the Chief 24 Minister. 25 Q. And then the Chief Minister sends you a</p> <p style="text-align: center;">Page 49</p>	<p>1 what was happening at the time. 2 MR SANTOS: Thank you. Can I ask you to 3 just stay there, because I think Mr Wagner 4 will now have some questions for you. 5 THE WITNESS: Sure. 6 MR SANTOS: I don't know whether now 7 might be a good time to have our break 8 before Mr Wagner starts? 9 THE CHAIRMAN: Perhaps it is. 10 MR WAGNER: I would prefer that. 11 THE CHAIRMAN: Sure, fair enough. 12 (11.08) 13 (Adjourned for a short time) 14 (11.18) 15 Questioned MR WAGNER 16 Q. Good morning, Mr Llamas. 17 A. Good morning. 18 Q. Mr Llamas, you said this morning that 19 you were told by your lawyer that you did 20 not write the letter of 5 June 2020 yourself. Is 21 that right? 22 A. That's right. 23 Q. Did you discuss your evidence with your 24 legal team after you began to give that 25 evidence?</p> <p style="text-align: center;">Page 51</p>
<p>1 picture on the following day and you say, 2 "So predictable". Do you know what that is 3 a reference to? 4 A. I don't remember what the picture was. 5 Have you got it? 6 Q. I don't believe we do. Then, just my final 7 question, given the various conversations that 8 we have just been through between you and 9 the Chief Minister and Mr Pyle, do you 10 maintain what you say -- sorry, I am told we 11 do have that, C6762 please. So it is a Tweet 12 from the leader of the opposition, Mr 13 Azopardi, I think that is being referred to. 14 And he is replying to a Tweet by Mr 15 McGrail. So, we don't have to go into detail, 16 but presumably the statement "so 17 predictable" is in relation to that? 18 A. Politics, yes. 19 Q. Given the various correspondence and the 20 exchanges that we can see, do you still 21 maintain the position that you weren't 22 involved in the process? 23 A. Absolutely. My greatest involvement in 24 the process was in relation to the procedural 25 errors. I was at the complete periphery of</p> <p style="text-align: center;">Page 50</p>	<p>1 A. I am sorry, I didn't hear the question. 2 Q. Did you discuss your evidence with your 3 legal team after you began to give that 4 evidence? 5 A. No, I was reminded by my lawyers that 6 the way that letter was created was on that 7 basis which yesterday I could not remember. 8 Q. How were you reminded by your lawyers 9 about that unless you were discussing your 10 evidence with your lawyers? 11 A. Well, because the lawyer must have 12 heard what I said and he reminded me that 13 that was not the way - that I had not written 14 the letter myself. 15 Q. Did he remind you during a meeting with 16 your lawyers about your evidence? 17 A. Sorry, which meeting? 18 Q. Were you meeting yesterday with your 19 lawyers about your evidence? 20 A. No, no. I was simply informed by a call. 21 Q. So, you were called by your lawyers 22 about your evidence? 23 A. Yes. 24 Q. How long did that call take? 25 A. It was just five - five, 10 minutes, just in</p> <p style="text-align: center;">Page 52</p>

<p>1 relation to that.</p> <p>2 Q. Five, 10 minutes -</p> <p>3 A. I don't - I -</p> <p>4 Q. - you were discussing your evidence with</p> <p>5 your lawyers?</p> <p>6 A. No, we were just discuss - he was just</p> <p>7 explaining to me the genesis of that letter</p> <p>8 because he heard that I had got - I had</p> <p>9 explained it wrongly to the inquiry.</p> <p>10 Q. You are a lawyer of longstanding, are you</p> <p>11 not, Mr Llamas?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know it is not permitted for</p> <p>14 witnesses to discuss their evidence with their</p> <p>15 lawyers whilst they are giving that evidence?</p> <p>16 A. I was - I had given mistaken information</p> <p>17 to the inquiry and he told me so and I thought</p> <p>18 I should put that to the inquiry just for the</p> <p>19 record to have the correct position set out.</p> <p>20 Q. The 5 June letter you say was drafted by</p> <p>21 your lawyers. Was that P. Caruana & Co?</p> <p>22 A. Yes.</p> <p>23 Q. So, on 5 June you were being represented</p> <p>24 by the same lawyer who was at that time</p> <p>25 acting for Blands in relation to Op Delhi?</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. How was your working relationship with</p> <p>2 Mr McGrail prior to the events of May 2020?</p> <p>3 A. At the personal level, us working together</p> <p>4 as I explained precisely in that letter, I</p> <p>5 consider that I enjoyed - we enjoyed - an</p> <p>6 excellent working relationship.</p> <p>7 Q. Did you have any cause for concern</p> <p>8 about Mr McGrail prior to May 2020?</p> <p>9 A. Well, I had concerns in relation to his</p> <p>10 policing style but that was not a matter that</p> <p>11 manifested itself in my own relationship with</p> <p>12 him.</p> <p>13 Q. Yes. Did you ever raise those concerns</p> <p>14 with him?</p> <p>15 A. No.</p> <p>16 Q. Have you provided any evidence to this</p> <p>17 inquiry in the form of text messages or</p> <p>18 emails or reports about your so-called</p> <p>19 concerns about his policing style?</p> <p>20 A. No, no, because this is a matter that you</p> <p>21 see or observe and you take in and it's - look,</p> <p>22 I'm not going to interfere in his policing</p> <p>23 style, that's a matter for him. I just take notes</p> <p>24 of what I see.</p> <p>25 Q. Yes. I want to ask you about role as</p> <p style="text-align: center;">Page 55</p>
<p>1 A. I don't know whether he was acting for</p> <p>2 Blands at that particular time but he had been</p> <p>3 acting for, before for Blands, yes.</p> <p>4 Q. As Attorney General you had</p> <p>5 responsibility for criminal prosecutions in</p> <p>6 Gibraltar. Were you not concerned about the</p> <p>7 potential conflict of interest?</p> <p>8 A. Between him advising me on the letter</p> <p>9 and he being the lawyer for Blands?</p> <p>10 Q. As well as complainants in Op Delhi?</p> <p>11 A. No, I didn't see that.</p> <p>12 Q. Did you think about it?</p> <p>13 A. Not particularly, no.</p> <p>14 Q. No. Do you take conflicts of interest</p> <p>15 seriously, Mr Llamas?</p> <p>16 A. Yes.</p> <p>17 Q. Have you disclosed the factual timetable</p> <p>18 which you gave your lawyers in order to</p> <p>19 draft the 5 June letter to this inquiry?</p> <p>20 A. Because we thought it was legally</p> <p>21 privileged material -</p> <p>22 Q. I am asking have you disclosed it?</p> <p>23 A. I don't think so, no.</p> <p>24 Q. No. Would you be willing to disclose it?</p> <p>25 A. Yes, absolutely.</p> <p style="text-align: center;">Page 54</p>	<p>1 Attorney General and if I could, please, have</p> <p>2 section 59 of the Constitution on the screen -</p> <p>3 I do not have the reference but Counsel to the</p> <p>4 Inquiry very kindly provided it before.</p> <p>5 Thank you. This is section 59 of the</p> <p>6 Constitution. It says, "There shall be an</p> <p>7 Attorney-General for Gibraltar whose office</p> <p>8 shall be a public office" and then subsection</p> <p>9 (2), "The Attorney-General shall have power</p> <p>10 in any case which he considers desirable to</p> <p>11 do so ... to institute and undertake criminal</p> <p>12 proceedings before any court of law ... take</p> <p>13 over and continue any such proceedings ...</p> <p>14 discontinue any criminal proceedings" and</p> <p>15 then if we just go a bit further down,</p> <p>16 subsection (3) you can delegate your powers,</p> <p>17 subsection (4) your powers are at the</p> <p>18 exclusion of other persons or authorities and</p> <p>19 then there are a few other subsections but no</p> <p>20 more powers. And there is one other</p> <p>21 reference in the Constitution. I think it is to</p> <p>22 do with disputes over elections to Gibraltar</p> <p>23 Parliament that the Attorney General has a</p> <p>24 remit over. Do you accept that the powers of</p> <p>25 the Attorney General under section 59 of the</p> <p style="text-align: center;">Page 56</p>

<p>1 Constitution are focused on criminal 2 proceedings? 3 A. Yes. 4 Q. And in fact section 59 only grants powers 5 over criminal proceedings. Is that fair? 6 A. Yes. 7 Q. Would you agree that criminal law is 8 therefore the central focus of the Attorney 9 General's constitutional role? 10 A. As set out in the Constitution, yes. 11 Q. So, is it right that you were appointed as 12 Attorney General, a role whose primary 13 constitutional power relates to criminal law 14 without having any criminal law experience? 15 A. Yes, although I take issue, even though 16 that is what the Constitution states - the role 17 of an Attorney General in any common law 18 jurisdiction is to be the principal legal adviser 19 to the Government and I think that goes with 20 the post. 21 Q. Yes, but prior to your appointment, your 22 predecessors have had quite a bit of criminal 23 experience - 24 A. Certainly my immediate predecessor, yes, 25 and it wasn't entirely crime but it was</p> <p style="text-align: center;">Page 57</p>	<p>1 law and litigation? 2 A. Because of the reason I just gave you. 3 The role of the Attorney General is one of 4 being the principal legal adviser to the 5 Government and he or she brings to the post 6 whatever relevant experience they have. 7 Q. Was the DPP role created to fill the gap 8 in your experience and knowledge of 9 criminal law? 10 A. Certainly a major reason not just - When 11 I became Attorney General, it was on the 12 proposal that I made to the Government to 13 restructure the Government law offices. 14 There were Government lawyers working in 15 different departments and what I said is when 16 - if I am appointed, I am going to create a 17 new office called the Government Law 18 Offices and there would be three different 19 offices within that and one of them would be 20 the OPCL, which is, I guess, the equivalent 21 of the CPS in England, the advisory office, 22 and then the Parliamentary Counsel office 23 that does the drafting. So, it was in the 24 process of a restructure and also to create and 25 to have in post a top criminal lawyer in the</p> <p style="text-align: center;">Page 59</p>
<p>1 certainly the lion's share of his practice, and I 2 don't really know what the situation - Mr 3 Rhoda was in office for 18 years. I don't 4 what his predecessors, how they balanced the 5 civil and the criminal - 6 Q. Mr Rhoda was a criminal silk before he 7 was appointed, I think. Is that right? 8 A. Correct. 9 Q. Yes, so the first Director of Public 10 Prosecutions was appointed in 2018 by you. 11 Is that right? 12 A. Was it 2018 or 2019? 13 Q. Well, the DPP Act was 2018. It may be 14 that he was appointed in 2019. I think he 15 served four-and-a-half years, did he not? 16 A. Yes. 17 Q. And the Director of Public Prosecutions 18 Act requires in section 4 that the DPP must 19 have adequate relevant experience and 20 expertise in criminal law and litigation. Is 21 that true? 22 A. Yes. 23 Q. Do you know why it is not a requirement 24 for the Attorney General to have adequate 25 relevant experience and expertise in criminal</p> <p style="text-align: center;">Page 58</p>	<p>1 team. 2 Q. Yes. Do you accept that your lack of 3 criminal law experience means that you need 4 to tread very carefully when you do decide to 5 become involved in criminal investigations? 6 A. Absolutely. 7 Q. And does that include taking advice from 8 a DPP? 9 A. Always. 10 Q. Always? So, on all matters of importance 11 in relation to criminal law, you would take 12 advice from the DPP before taking a step - 13 A. I think so, yes. 14 Q. You think so. Are you personally close 15 to Mr Picardo? 16 A. I've known him for a long time. I 17 consider him to be a friend and since 2016 18 we have been working very closely and very 19 intensively on the Brexit Referendum sequel. 20 Q. Yes. Are you personally close to Mr 21 Levy? 22 A. No, I wouldn't say I am particularly close 23 to Mr Levy. Mr Levy is somebody I got to 24 know only from about 2012. I didn't have a 25 lot of contact with him prior to that but with</p> <p style="text-align: center;">Page 60</p>

<p>1 time, yes, I mean I've become - I wouldn't 2 say close but we have a good contact. We've 3 had a good contact for a while. 4 Q. Are you friends? 5 A. I suppose you could say that. 6 Q. Do you see each other socially? 7 A. Not socially. I don't see any of my 8 friends socially these days. 9 Q. Just going back to section 59, and if we 10 could go a little bit further down - it is on the 11 screen - subsection (5) "In the exercise of 12 the powers conferred upon him by this 13 section, the Attorney-General shall not be 14 subject to the direction or control of any 15 other person or authority" and that language, 16 as I am sure you know, is reflected in section 17 31(7) relating to the power to intervene and 18 determine questions of membership of the 19 Gibraltar Parliament. Do you accept that that 20 provision creates a statutory requirement of 21 independence for the Attorney General? 22 A. Of course. 23 Q. And do you accept that you have to be 24 very careful to ensure that you are not under 25 the direction or control of any other person or</p> <p style="text-align: center;">Page 61</p>	<p>1 A. Exactly. 2 Q. - in giving a witness statement to a public 3 inquiry - 4 A. Yes. 5 Q. You would go through all your texts and 6 emails before giving your evidence. Is that 7 right? 8 A. Yes. 9 Q. I want to ask you about the May 2019 10 meeting relating to the Op Delhi. If we just 11 go to A274, please, paragraph 17 - 12 A. Is this my first witness statement? 13 Q. Yes, it is. Now, you have already been 14 through this, the fact that you mentioned the 15 meeting and then if we just go a little bit 16 further down, there is a paragraph there, "Mr 17 McGrail explained" and then you set it out. 18 You have already read it. In this statement 19 you made out - or it appeared from this 20 statement you were at the 2009 meeting - 21 sorry, 2019 meeting, but now you say you 22 probably were not there. Is that right? 23 A. Yes. 24 Q. How did you draft this part of the 25 statement?</p> <p style="text-align: center;">Page 63</p>
<p>1 authority? 2 A. I accept that. 3 Q. And do you accept that that includes the 4 Chief Minister? 5 A. Absolutely. 6 Q. Mr Llamas, have you been honest and 7 transparent with this inquiry? 8 A. Absolutely. 9 Q. Does your written evidence to the inquiry 10 provide a full and accurate account of your 11 involvement in events? 12 A. It does. 13 Q. Did you check your emails and messages 14 before drafting your witness statements? 15 A. I must have done some research at the 16 time, yes. 17 Q. I am sorry, you did not answer the 18 question. Did you check your emails and 19 messages before drafting your witness 20 statements? 21 A. I think I must have, yes. 22 Q. Do you remember doing it? 23 A. I can't imagine not doing it. 24 Q. Yes, well, as the Attorney General you 25 would -</p> <p style="text-align: center;">Page 62</p>	<p>1 A. From memory. 2 Q. How could you have a memory of a 3 meeting that you were not at? 4 A. Because the DPP must have informed me 5 about the meeting after it took place. 6 Q. Is there any note that the DPP sent to 7 you? 8 A. I don't recall that. 9 Q. So, all of this detail that came out of this 10 paragraph is from your memory of a briefing 11 you received from the DPP? 12 A. Yes, it must be that. 13 Q. It must be that. Whether or not you were 14 at the meeting, is it fair to say that from 15 around May 2019 you were aware of the 16 following factors, and just let me know if you 17 were or were not aware: you knew that the 18 Op Delhi investigation involved a company 19 called 36 North. Is that right? 20 A. Yes. 21 Q. You knew that 36 North was suspected to 22 have been set up to take the service of the 23 NSCIS platform from Bland? 24 A. I did not necessarily know that. 25 Q. Well, I only say that because in paragraph</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 18, which is on the screen, you say, "He also 2 explained that the investigation covered a 3 company, "36 North" ... for the suspected 4 purpose of taking over from Bland ... the 5 provision of the NSCIS platform service to 6 the Government." 7 A. Yes, I apologise. That is what I say there. 8 I just don't remember - I just remember 9 knowing about the existence of the company 10 but when it was - whether it was set up for 11 this purpose is something which I recollect 12 knowing subsequently. 13 Q. Yes. 14 A. Yes, that's what I said. 15 Q. This statement was, I think, two years 16 ago and it was two years after the event. So 17 would you agree that is probably a better - it 18 sets out better your recollection than your 19 recollection now? 20 A. Yes. 21 Q. You knew that that service, the NSCIS - 22 that Bland were providing - was provided to 23 and paid for by the Government? 24 A. Yes. 25 Q. You knew that Hassans held shares in 36</p> <p style="text-align: center;">Page 65</p>	<p>1 believe that that was necessary. 2 Q. You did not think, when you either sat in 3 that meeting or received the briefing from the 4 DPP, "This investigation involves Hassans 5 and Mr Levy. I need to put in place some 6 sort of information rules as the person in 7 charge ultimately in the prosecution"? 8 A. I thought that the Chief Minister is a man 9 who is extremely busy. I know that Hassans 10 have numerous business enterprises and it 11 was absolutely clear to me that the Chief 12 Minister probably didn't even know what 13 those business enterprises were. I just 14 happened to be a shareholder as a partner of 15 these firms but without necessarily knowing 16 what was being done, so I didn't see an 17 involvement concerning the Chief Minister. 18 Q. Yes. You knew that Hassans had lots of 19 business enterprises. Did you know of any 20 others that were being investigated by the 21 police? 22 A. No. 23 Q. You said you did not think that the Chief 24 Minister knew about being a shareholder of 25 36 North. Did you ask him?</p> <p style="text-align: center;">Page 67</p>
<p>1 North? 2 A. Yes. 3 Q. You knew Mr Picardo had worked at 4 Hassans for around 20 years before 5 becoming Chief Minister? 6 A. Yes. 7 Q. You knew that Mr Picardo was still a 8 partner at Hassans on sabbatical? 9 A. Yes. 10 Q. You knew that Mr Picardo had a very 11 close personal and professional relationship 12 with Mr Levy? 13 A. Yes. 14 Q. And you knew that Mr Levy was 15 potentially a person of interest. 16 A. Yes. 17 Q. So, around that stage, around May 2019, 18 as the guardian of the public interest and with 19 ultimate responsibility for criminal 20 prosecutions, did you put in place any 21 measures to ensure that Mr Picardo could not 22 influence the criminal investigation which 23 involved his company, his partners and his 24 close friend? 25 A. No, there was no - nothing led me to</p> <p style="text-align: center;">Page 66</p>	<p>1 A. No, all I'm saying is that my 2 understanding of Hassans is that they've got 3 holding companies where all partners are 4 shareholders, and I think that company or 5 companies, I don't know, then make - may 6 make - business investments and that many 7 of the partners - I think that's probably run 8 by two or three of the partners and the rest 9 don't necessarily know what's happening. 10 Q. Did you ask Mr Picardo whether he had 11 any involvement in 36 North? 12 A. At what moment in time? 13 Q. Ever. 14 A. Yes, absolutely. 15 Q. When did you ask him? 16 A. I don't know. We must have spoken 17 about it at the time but I didn't see - and I 18 certainly was unaware of any involvement of 19 his in relation to the NSCIS platform. 20 Q. I will come to that in a minute, but did 21 you know at any point that M Picardo had 22 been exchanging good luck text messages 23 with the founds of 36 North before he left 24 Bland? 25 A. No.</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 Q. No. Did you know that Mr Picardo was 2 being kept updated in relation to the NSCIS 3 contract - 4 A. No. 5 Q. I have not finished the question - by Mr 6 Levy? 7 A. No, because I wasn't aware of any of that. 8 Q. You were not aware of any of it? When 9 did you first become aware of all that? 10 A. In some substance in the conversation 11 with Mr - with the DPP on 6 April 2020. 12 Maybe he may have mentioned it in what the 13 DPP described, the last - the light touch 14 update he would give me. I don't remember 15 but certainly I would have known by 6 April 16 2020. 17 Q. So you would have known by 6 April 18 2020 that the Chief Minister had a stake in 19 Op Delhi - sorry, a stake in 36 North? 20 A. (no reply) 21 Q. Or a stake in Astelon? 22 A. Yes. 23 Q. - which then meant he had a beneficial 24 interest in 36 North, and you knew in some 25 detail that he had been involved in</p> <p style="text-align: center;">Page 69</p>	<p>1 he would know that as well." Is that the 2 approach you took to criminal investigations 3 that you were involved in? 4 A. I was involved in very few criminal 5 investigations. However, I can tell you that 6 in relation to this one, I did not speak to the 7 Chief Minister about Op Delhi until 12 May. 8 Q. I am sorry, I am going to ask the question 9 again. Do you agree with the DPP's 10 approach that if the Chief Minister asked to 11 speak to him about a criminal investigation, 12 he would refuse? 13 A. Yes. 14 Q. You agree? 15 A. Yes. 16 Q. If we just go a little bit down, Mr Santos 17 asked: "Do you mean in relation to any 18 investigation or this investigation in 19 particular? This investigation definitely not 20 because of the ultimate beneficial ownership 21 of North 36." Do you agree with the Director 22 of Public Prosecutions that if the Chief 23 Minister came to speak to you about Op 24 Delhi in particular, you definitely would not 25 speak to him because of his ultimate</p> <p style="text-align: center;">Page 71</p>
<p>1 corresponding with Mr Levy? 2 A. No, not even that. 3 Q. Not even that? And you never asked the 4 Chief Minister about this? 5 A. I may or I may not have. I can't 6 remember. 7 Q. I am going to ask for a transcript now to 8 Day 10, Mr Triay if possible, and page 82, 9 line 6. This is the DPP's evidence. He said, 10 ", I want to clarify what I just said". So, he 11 had been asked about whether he had reason 12 to speak to the Chief Minister about Op 13 Delhi. 14 A. I am sorry, I can't see it. 15 Q. Sorry, so it is line 6. It is on the left-hand 16 side. 17 A. Okay. 18 Q. He is asked about his contacts with the 19 Chief Minister about Op Delhi. He said he 20 had none. "In fact, I want to clarify what I 21 just said, Mr Santos, is that if I were 22 contacted by the Chief Minister and asked 23 any information about an ongoing inquiry, I 24 would likely, depending on what it was, 25 refuse to speak to him about it, and I think</p> <p style="text-align: center;">Page 70</p>	<p>1 beneficial ownership of 36 North? 2 A. Yes. 3 Q. Did you ever say to the Chief Minister at 4 any time words to the effect of, "As the 5 Government's legal adviser, and the guardian 6 of the public interest, I am advising you that 7 you must not attempt to influence the Op 8 Delhi investigation because you have a direct 9 interest in its outcome?" 10 A. Did I send such a message to the Chief 11 Minister? 12 Q. Did you say it to him; did you send a 13 message? 14 A. No. 15 Q. Did you send an email? 16 A. No, no. 17 Q. Did you ever say, "Mr Picardo, you're a 18 partner at Hassans, a close friend of Mr 19 Levy, a beneficial of 36 North" - I am sorry, 20 "beneficial owner of 36 North. You must 21 therefore not contact the RGP at all about Op 22 Delhi"? 23 A. I don't know, Mr Wagner. It was a long - 24 just let's retrace this. So, I get notified by Mr 25 McGrail's message of May '19. The DPP</p> <p style="text-align: center;">Page 72</p>

<p>1 subsequently must have briefed me as I set 2 out in paragraph 18 and then I am not - you 3 know, I am not - I don't know. I mean, I 4 don't know what's happening in criminal 5 investigations. 6 Q. No. 7 A. If you're asking me whether, from the 8 moment that I realised that 36 North was in 9 the picture here - 10 Q. Yes. 11 A. - and that at some point I must have 12 made the link with Hassans that I went to the 13 Chief Minister and told him, "Look", the sort 14 of message that you're telling me, whatever 15 shape or form, maybe I did, maybe I didn't. I 16 really don't know. I can't - I can't answer 17 that question. 18 Q. Did you ever say to the Chief Minister, 19 "You must not discuss Op Delhi with the 20 Commissioner of Police"? 21 A. With the Commissioner of Police? 22 Q. Yes. 23 A. No. 24 Q. Did you ever say to the Chief Minister, 25 "You must not discuss Op Delhi with Mr</p> <p style="text-align: center;">Page 73</p>	<p>1 Q. Yes. We will come to after April in a 2 moment. You said in your evidence 3 yesterday many times how concerned you 4 were for the reputation of Gibraltar. Was it a 5 threat to Gibraltar's reputation that a criminal 6 investigation against high-profile people 7 would run its course? 8 A. For the same reasons as Mr McGrail and 9 Mr Richardson thought so. 10 Q. Well, Mr McGrail and Mr Richardson 11 were the police investigating the crime, the 12 alleged crimes. You were the Attorney 13 General. From your perspective as Attorney 14 General, was it a threat to Gibraltar's 15 reputation that the criminal investigation into 16 the high-profile people would run its course? 17 A. High-profile people and a very sensitive - 18 and a very sensitive matter. 19 Q. So, it was a threat to Gibraltar's 20 reputation that the investigation ran its 21 course? 22 A. No, that it should run its course carefully. 23 Q. Was not the real threat to Gibraltar's 24 reputation that the criminal investigation into 25 the high-profile people was prevented from</p> <p style="text-align: center;">Page 75</p>
<p>1 Levy, who's a person of interest in the 2 investigation"? 3 A. No, no. I mean I can't - no. I don't 4 recollect any of that. 5 Q. Did you ever say to the Chief Minister, 6 "I, the Attorney General, cannot discuss this 7 investigation with you"? 8 A. We never did. 9 Q. You never discussed the investigation? 10 A. No. 11 Q. I realise you do not come from a criminal 12 law background, Mr Llamas, but were you 13 not anxious at any point that Mr Picardo not 14 do anything which might be construed as 15 influencing or interfering with the 16 investigation that he had a direct interest in? 17 A. No, I trusted his judgment. 18 Q. You trusted his judgment? 19 A. Also, Mr Wagner, that in combination 20 with my little interest in the investigation 21 from the moment I was informed of it to 22 April 2020. I mean, I wasn't following the 23 investigation at all. 24 Q. It was passing you by in that period? 25 A. No, it was the DPP's job.</p> <p style="text-align: center;">Page 74</p>	<p>1 proceeding? 2 A. Not at all. It was not prevented. 3 Q. Did the criminal investigation conclude? 4 A. I think it concluded - what do you mean 5 - 6 Q. Sorry, were the individuals convicted of 7 their crimes? 8 A. No, no, because I entered the nolle in 9 January, two years after these events. 10 Q. Yes. Was it a threat to Gibraltar's 11 reputation that high-profile people could be 12 treated more leniently than others? 13 A. No, I think the threat here was the 14 exposure and the subject matter of the 15 investigation at a very critical moment in our 16 history and as I explained yesterday, that did 17 not mean that the investigation should be 18 stopped but that it should proceed on a secure 19 and safe basis, which is the message I was 20 trying to deliver to Mr McGrail on 7 April. 21 Q. When you attended the meeting on 12 22 May, you have demurred from using the 23 word "berated" but would you agree that Mr 24 Picardo angrily criticised Mr McGrail's 25 handling of the investigation?</p> <p style="text-align: center;">Page 76</p>

<p>1 A. Yes. I think that's true.</p> <p>2 Q. And that he angrily criticised the decision</p> <p>3 to undertake a warrant against Mr Levy?</p> <p>4 A. He didn't agree that that was the</p> <p>5 appropriate procedure to have used.</p> <p>6 Q. Well, he did not just not agree; he angrily</p> <p>7 criticised the Commissioner of Police, did he</p> <p>8 not?</p> <p>9 A. Well, he was - the exchange was angry.</p> <p>10 Q. Yes.</p> <p>11 A. Whether he manifested that in particular</p> <p>12 to one issue or the other, I can't remember</p> <p>13 now.</p> <p>14 Q. Yes.</p> <p>15 A. The general tone was one which was</p> <p>16 angry, yes.</p> <p>17 Q. That meeting took place whilst the RGP</p> <p>18 were at Mr Levy's offices, did it not?</p> <p>19 A. It took place immediately after Mr</p> <p>20 McGrail sent his WhatsApp messages or</p> <p>21 shortly thereafter.</p> <p>22 Q. Which was why you met - you, the Chief</p> <p>23 Minister and Mr McGrail met - whilst the</p> <p>24 RGP were still at the Hassans' offices, did</p> <p>25 you not?</p> <p style="text-align: center;">Page 77</p>	<p>1 A. I don't know.</p> <p>2 Q. You do not know? You do not know</p> <p>3 whether it was appropriate for the Chief</p> <p>4 Minister -</p> <p>5 A. Hold on.</p> <p>6 Q. Yes.</p> <p>7 A. I am trying to think.</p> <p>8 Q. I'm sorry for interrupting.</p> <p>9 A. He receives the message. He is very</p> <p>10 angry about it and he calls Mr McGrail not</p> <p>11 knowing when he called him that Mr</p> <p>12 McGrail happened to be in the building, so I</p> <p>13 don't know whether he was just going to</p> <p>14 speak to him, and then the meeting, which</p> <p>15 was very impromptu took place. So, it was</p> <p>16 very coincidental, let's say. I am just</p> <p>17 retracing. Now ask me the question again.</p> <p>18 Q. Well, it was not coincidental. Mr Picardo</p> <p>19 called in Mr McGrail, did he not?</p> <p>20 A. Only because he was in the building.</p> <p>21 Q. He chose to call him in.</p> <p>22 A. Well, if he was in the building, it was</p> <p>23 obvious that he was going to come up. Had</p> <p>24 Mr McGrail been in New Mole House at that</p> <p>25 moment, I think they would have spoken</p> <p style="text-align: center;">Page 79</p>
<p>1 A. Yes, I think that was the case.</p> <p>2 Q. So, during the attempt to exercise the</p> <p>3 search warrant, you and the Chief Minister</p> <p>4 had a meeting with Mr McGrail and the</p> <p>5 Chief Minister angrily criticised the decision</p> <p>6 to do the warrant. Is that right?</p> <p>7 A. yes, I think that's correct.</p> <p>8 Q. You were asked yesterday by Mr Santos,</p> <p>9 "Did you consider whether it was appropriate</p> <p>10 for him to be discussing the matter with Mr</p> <p>11 McGrail given Mr Levy's relationship with</p> <p>12 the 36 North angle?" You said, "It all</p> <p>13 happened very quickly. He was the recipient</p> <p>14 of this WhatsApp. He reacted to the</p> <p>15 message." I am going to ask you that</p> <p>16 question again. Did you consider whether it</p> <p>17 was appropriate for Mr Picardo to be</p> <p>18 discussing the matter with Mr McGrail given</p> <p>19 his relationship with Mr Levy and the 36</p> <p>20 North angle?</p> <p>21 A. Well, my answer is exactly the same as</p> <p>22 yesterday. Look, he received this, he was</p> <p>23 angry and he wanted to speak to Mr McGrail.</p> <p>24 Q. Did you think it was appropriate for him</p> <p>25 to do that?</p> <p style="text-align: center;">Page 78</p>	<p>1 over the phone, I don't know.</p> <p>2 Q. And you chose to go with him.</p> <p>3 A. I was with him.</p> <p>4 Q. You were with him anyway?</p> <p>5 A. Yes.</p> <p>6 Q. So, you were already discussing the</p> <p>7 warrant?</p> <p>8 A. Whether we were just exchanging,</p> <p>9 whatever, we realised we had received</p> <p>10 exactly the same WhatsApp.</p> <p>11 Q. Were you already discussing the</p> <p>12 warrants?</p> <p>13 A. No. I wouldn't get into discussions about</p> <p>14 warrants.</p> <p>15 Q. So, he realised he received the same</p> <p>16 WhatsApp. You then did not say anything?</p> <p>17 Nothing - no exchange?</p> <p>18 A. No, no.</p> <p>19 Q. And no (inaudible) happened?</p> <p>20 A. No, I don't remember that very precisely,</p> <p>21 Mr Wagner, but I don't think - I think his</p> <p>22 instinct was to call in straightaway so we just</p> <p>23 exchanged or compared WhatsApps and he</p> <p>24 wanted to speak to Mr McGrail. It all</p> <p>25 happened very quickly, the whole thing.</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 Q. It did. He called Mr McGrail in. Did you 2 not say at that point, as the Attorney General 3 and the guardian of the public interest, did 4 you not say to Mr Picardo, "You cannot 5 involve yourself in this investigation in this 6 way"?</p> <p>7 A. No, I did not say that.</p> <p>8 Q. You did not think to say that?</p> <p>9 A. Mr Wagner, it all happened very quickly.</p> <p>10 Q. It happened very quickly. While you 11 were in the room, did you think to yourself, 12 "I, as the person in charge of criminal 13 prosecutions and the guardian of the public 14 interest - I cannot be in this room"?</p> <p>15 A. No, I did not ask myself that question.</p> <p>16 Q. Should you have asked yourself that 17 question?</p> <p>18 A. Maybe in hindsight I should have, yes.</p> <p>19 Q. Yes. Why?</p> <p>20 A. Because maybe that was an exchange that 21 should not have happened thinking about it in 22 hindsight, but at the moment, at that moment 23 in time, it just felt he received the message, 24 he's angry with what happened. He had his 25 reasons and he therefore called Mr McGrail</p> <p style="text-align: center;">Page 81</p>	<p>1 A. Yes.</p> <p>2 Q. And you did not advise him, did you?</p> <p>3 A. I don't think I did, not on the terms that 4 you've described.</p> <p>5 THE CHAIRMAN: When you say that in 6 hindsight this was an exchange which should 7 not have happened, when did you come by 8 that knowledge?</p> <p>9 A. The knowledge of the hindsight?</p> <p>10 THE CHAIRMAN: Well, I am just quoting 11 to you your words that maybe in hindsight 12 this was an exchange which should not have 13 happened. When did you come by that 14 knowledge?</p> <p>15 A. Maybe during this inquiry, perhaps.</p> <p>16 THE CHAIRMAN: On the evening of 12 17 May, did you not reflect, "Well, hang on. 18 This just isn't right, the Chief Minister having 19 an angry exchange with the Chief Office of 20 Police"?</p> <p>21 A. Yes, I did - I did feel very uncomfortable 22 about that night. I do remember that.</p> <p>23 THE CHAIRMAN: Yes. Now, what did 24 you do about it?</p> <p>25 A. I can't remember, sir. I can't remember</p> <p style="text-align: center;">Page 83</p>
<p>1 who happened to be in the building and 2 therefore he came up. I mean, I don't know 3 how long it took from receipt of the email to 4 Mr McGrail coming up to the Cabinet room.</p> <p>5 Q. Yes. In hindsight you say it should not 6 have happened. The Chief Minister has no 7 function in relation to police investigations 8 does he?</p> <p>9 A. Directly in relation to police? I don't 10 think so.</p> <p>11 Q. Well, I mean you know the Constitution.</p> <p>12 A. Yes.</p> <p>13 Q. He has no function at all relating to police 14 investigations does he?</p> <p>15 A. Yes.</p> <p>16 Q. He has no power to get involved in police 17 investigations does he?</p> <p>18 A. Yes, and being the recipient of that 19 message I thought - I mean, it's not for me to 20 speculate on what he thought, but he thought 21 it appropriate to have that discussion with Mr 22 McGrail.</p> <p>23 Q. Yes. It is not your job to speculate on 24 what he thought, but it is your job to advise 25 him, is it not?</p> <p style="text-align: center;">Page 82</p>	<p>1 whether I spoke to the Chief Minister or 2 whether I didn't. I honestly do not remember 3 that.</p> <p>4 THE CHAIRMAN: Or say the following 5 day when you had had a day to think about it.</p> <p>6 A. Yes, yes. I can't remember.</p> <p>7 THE CHAIRMAN: Well, are you 8 suggesting you did say something?</p> <p>9 A. I can't remember.</p> <p>10 THE CHAIRMAN: Well, if you had said 11 something, surely you would have 12 remembered?</p> <p>13 A. Yes, and probably I think it's more likely 14 than not that I did not say anything. I 15 honestly haven't got a recollection of that.</p> <p>16 THE CHAIRMAN: But if you did not say 17 anything, the next question, of course, is why 18 not.</p> <p>19 A. Why not? Because if that was the case, I 20 thought that what happened happened and 21 that was the end of the matter, and that he - 22 which is effectively what happened. It was a 23 spur of the moment reaction and that it would 24 end there, which effectively it did.</p> <p>25 MR WAGNER: That was not the end of the</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 matter, though, was it because the contents of</p> <p>2 that meeting were used as a central plank of</p> <p>3 the reasons for the Chief Minister losing</p> <p>4 confidence in Mr McGrail?</p> <p>5 A. When I said "the end of the matter", I</p> <p>6 meant in relation to investigation, not the</p> <p>7 retirement procedure.</p> <p>8 Q. No, well that is what came from that</p> <p>9 meeting, is that the Chief Minister says he</p> <p>10 lost confidence in Mr McGrail because he</p> <p>11 felt lied to. At what point in the next three</p> <p>12 weeks or so, four weeks before the 28 days</p> <p>13 before he was retired, did you set down</p> <p>14 somewhere in writing, or point out to</p> <p>15 anybody, that you felt that meeting should</p> <p>16 not have happened?</p> <p>17 A. I did not.</p> <p>18 Q. You did the opposite, did you not? You</p> <p>19 supported and backed the Chief Minister in</p> <p>20 every action he took in the next four weeks</p> <p>21 that led to the retirement of Mr McGrail?</p> <p>22 (11.56)</p> <p>23 A. Well, as I've just explained to Mr Santos,</p> <p>24 I didn't have a lot of involvement in that</p> <p>25 procedure.</p> <p style="text-align: center;">Page 85</p>	<p>1 that my reaction on the technical experts can</p> <p>2 say when a phone has been accessed, it must</p> <p>3 have been in - I must have been reacting in</p> <p>4 relation to what was Mr Levy's overriding</p> <p>5 concern at that moment in time, which was</p> <p>6 what was happening to his devices.</p> <p>7 Q. Yes, and Mr Santos took you to the part</p> <p>8 of the exchange where you say, "(2)(b)" and</p> <p>9 Mr Picardo says, "Exactly, in re a search</p> <p>10 warrant as a proceeding." You said, "We</p> <p>11 need to check what 'such' means." You,</p> <p>12 obviously, knew then on the 18th that he was</p> <p>13 corresponding with you about the search</p> <p>14 warrant, did you not?</p> <p>15 A. Generally, in the context of the message</p> <p>16 that he sent me --</p> <p>17 Q. Yes. Well, not generally, specifically</p> <p>18 about Mr Levy's search warrant, correct?</p> <p>19 A. Yes, yes, I see what you mean. Yes,</p> <p>20 that's the implication of that exchange, yes.</p> <p>21 Q. Yes. If you realised on the evening of 12</p> <p>22 May or thereabouts that Mr Picardo should</p> <p>23 not have met with Mr McGrail about this</p> <p>24 investigation, why were you still</p> <p>25 corresponding with him about the same</p> <p style="text-align: center;">Page 87</p>
<p>1 Q. We will come to that. You said the</p> <p>2 warrant came as a shock and things happened</p> <p>3 very quickly on 12 May. If we put up B1,</p> <p>4 418, you saw these this morning. These are</p> <p>5 the messages you were exchanging with Mr</p> <p>6 Picardo on 17 May, so, over five days later.</p> <p>7 This is where Mr Picardo is assembling the</p> <p>8 various messages, which in fact, he's also</p> <p>9 sending to Mr Baglietto. Did you know he</p> <p>10 was sending them to Mr Baglietto, as well?</p> <p>11 A. No.</p> <p>12 Q. At page 13 of the HMIC report, you say,</p> <p>13 "Boom. Hardly encouraging", then he refers</p> <p>14 to section 59(2)(b) of the Constitution</p> <p>15 relating to the search warrant, that is the next</p> <p>16 day. Do you accept that this exchange relates</p> <p>17 to the search warrant?</p> <p>18 A. No, because when I saw - to the extent</p> <p>19 that I engaged in this exchange, which was</p> <p>20 not a lot - when I saw the HMIC reports what</p> <p>21 I seem to remember was the discussions and</p> <p>22 the reactions when we received the HMIC</p> <p>23 reports, which I think was several months</p> <p>24 earlier. That was my main thought. I mean,</p> <p>25 in examination Mr Santos has made me think</p> <p style="text-align: center;">Page 86</p>	<p>1 investigation six days later?</p> <p>2 A. Corresponding is perhaps putting it too</p> <p>3 high, Mr Wagner. He was sending me</p> <p>4 material; I do a quick reply and the</p> <p>5 conversation ends on both the HMIC reports</p> <p>6 and the section - sub section (2)(b) matter.</p> <p>7 Q. Why did you not say to him then, "Mr</p> <p>8 Picardo, we cannot discuss this. This is a</p> <p>9 live investigation in which you have a direct</p> <p>10 personal interest, that is it. Please do not</p> <p>11 correspond with me again about this"?</p> <p>12 A. No, I didn't - I mean, I didn't.</p> <p>13 Q. Should you have?</p> <p>14 A. It's a difficult question in the sense of,</p> <p>15 should I? Yes, perhaps I should have, but I</p> <p>16 thought I was dealing with it by not engaging</p> <p>17 in it.</p> <p>18 Q. Yes. Well, you do engage because you</p> <p>19 actually propose (2)(b), do you not?</p> <p>20 A. Me? No, I'm trying to understand why</p> <p>21 he's sending - I think he's sent me just the</p> <p>22 picture.</p> <p>23 Q. And you say, "We need to check what</p> <p>24 'such' means in that context", do you not?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 88</p>

<p>1 Q. So, you are engaging. You are not just 2 shutting down the conversation; you are 3 engaging. 4 A. Yes, it is shutting up the conversation, 5 because nothing happens after that. 6 Q. I want to ask you about your contact with 7 Mr Baglietto and Mr Levy, C6, 884, please. 8 A little bit further down the page. Yes, so, I 9 just want to make sure we have got the right 10 picture here, that you spoke to Mr Baglietto 11 on the 13th? 12 A. I think that's when I must have called him 13 after the meeting of the 13th, yes. 14 Q. Yes. 15 A. Yes, or returned his missed calls of that 16 day. 17 Q. And then Mr Baglietto and Mr Moshe 18 Levy were at your office on the 14th. You do 19 not know if you met with them, or not? 20 A. That is correct. 21 Q. Mr Baglietto then met you at your office 22 on the 15th as evidenced by his text message 23 to you. That is on the Friday. Is that right? 24 A. I think that's right - oh, because this is not 25 in the WhatsApp exchange, yes, but that's</p> <p style="text-align: center;">Page 89</p>	<p>1 A. No, no, I don't know whether they go 2 back that far. 3 Q. And you met with Mr Baglietto at least 4 once and possibly twice. Is that right? 5 A. I met him on the 15th. I'm pretty sure I 6 didn't meet him on the 14th. So, certainly, 7 once. 8 Q. Yes, and possibly twice, and you were 9 texting him as well during this period? 10 A. Well, what I've disclosed to the inquiry, 11 yes. 12 Q. Yes. Can we go to A305, please, 13 paragraph 27. So, this is your responsive 14 statement, the second statement you gave. 15 A. Is this the second one? 16 Q. Yes, and you are responding to paragraph 17 55 of Mr McGrail's first statement, "I should 18 add that although I cannot be certain" - this 19 is Mr McGrail's words - "and this will no 20 doubt emerge from evidence at the hearing, 21 that I got the impression that, aside from the 22 correspondence, the AG was talking to Mr 23 Baglietto. I was dismayed that proper 24 boundaries were not being maintained." You 25 respond as follows, "I would like to clarify</p> <p style="text-align: center;">Page 91</p>
<p>1 right. 2 Q. Sorry, yes, it is in his text messaging 3 exchange with you. 4 A. Yes. That's when I recall meeting him 5 for the first time. 6 Q. And then on 20 May you spoke, and I 7 think that is on C6, 884. There you can see, 8 "Can I call" - sorry, it was on the right place, 9 yes, there. 20 May, one o'clock, "Can you 10 call me?" missed voice call, "Sorry I was on 11 telephone. Just tried to call you". Missed 12 voice call. So, you think you spoke to him 13 again on the 20th? 14 A. Yes, I must have. 15 Q. So, in the eight days from 12 May you 16 spoke to Mr Baglietto at least twice. Is that 17 right? 18 A. I spoke to Mr Baglietto, yes, twice. 19 Q. At least twice? Can you be sure you did 20 not speak to him otherwise? 21 A. I'm pretty sure. I mean, I can't be 100 per 22 cent sure, but I'm pretty sure it was on those 23 two moments. 24 Q. No. We have not got your call records, 25 have we?</p> <p style="text-align: center;">Page 90</p>	<p>1 that, while it is possible that I may have 2 spoken to Lewis Baglietto on 12 May, it 3 would have been to take a call from him 4 saying how aggrieved James Levy was and 5 that the letter or email (subsequently that 6 evening) was coming. I was certainly not 7 'talking to Mr Baglietto' other than to that 8 extent." Do you accept that this paragraph in 9 your witness statement is inaccurate? 10 A. Well, it's accurate as far as 12 May is 11 concerned. 12 Q. Right, but does it not give the impression 13 that you were not talking to Mr Baglietto 14 other to that extent? 15 A. On 12 May it was to that extent. 16 Q. You did not think to add into your 17 statement, "I actually had a few more 18 contacts with Mr Baglietto. So, Mr 19 McGrail's impression may have been 20 correct"? 21 A. No, and I think I deal with that in one of 22 my paragraphs. 23 Q. Well, we can find that, maybe over the 24 lunch adjournment. Did you take advice 25 from the DPP about the propriety of speaking</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 directly to a criminal suspect during the 2 execution of a warrant? 3 A. No. 4 Q. No. Did you take advice from the DPP 5 about talking to the criminal suspect at all 6 during an investigation? 7 A. In the qualification that what you refer to 8 as talk was a very short telephone call where 9 I largely listened to Mr Levy express his 10 concerns, and I ended up telling him that the 11 matter was going to - I think I told him, "You 12 should speak to the DPP because this is not a 13 matter for me. So, don't exaggerate the 14 word, "talk". It was one conversation that I 15 had with Mr Levy on the day, on 12 May. 16 (12.06) 17 Q. Yes. 18 A. And it was largely to hear him out as to 19 how he felt. 20 Q. I'm sorry. You must have a different 21 understanding of the word "talk" than I do. 22 You did talk to him, didn't you? 23 A. Yes. A very -- a five -- probably a five 24 minutes talk, yes. 25 Q. Did you take advice from the DPP about</p> <p style="text-align: center;">Page 93</p>	<p>1 already explained and I don't want to -- if 2 you want I can repeat -- 3 Q. No, no. 4 A. -- my reasons for it. But those were my 5 reasons and I achieved what I wanted to 6 achieve. 7 Q. Which was that you said you lied to Mr 8 Levy? 9 A. Well, I did not want to -- my concern was 10 "Don't worry", end of conversation. 11 Q. Yes, but you said you lied to Mr Levy? 12 A. Well, I'm only saying that I lied in the 13 sense that considering what's being attributed 14 to me by "Don't worry". 15 Q. Yes. 16 A. In the case of what you are saying. Your 17 argument is you gave a reassurance to the 18 suspect. I only -- what I was saying by "I 19 lied" to Mr Levy is to show to you that the 20 last thing I was doing is to reassure him, 21 because what had been agreed that day was 22 not what Hassans were seeking on his behalf. 23 That is all. I mean, I wasn't doing -- the 24 purport of "Don't worry" was exactly the 25 opposite of the significance and the meaning</p> <p style="text-align: center;">Page 95</p>
<p>1 the propriety of texting the criminal suspect, 2 "Don't worry"? 3 A. No. No, because as I -- I've explained my 4 reasons for "Don't worry" yesterday. 5 Q. Yes. I think you said you were very tired 6 and had been working into the night. Is that 7 right? 8 A. Yes. I said that. 9 Q. Do you regret sending that text? 10 A. Considering how it's been distorted, yes 11 of course I do. 12 Q. You're not a private citizen, are you, you 13 are the Attorney General. 14 A. Yes. 15 Q. And the Attorney General texting a 16 suspect "Don't worry" in the middle of an 17 investigation, I mean, as a lawyer and 18 Attorney General, do you not see that that is 19 actually quite a clear message? 20 A. It's not clear at all, Mr Wagner, and I 21 made my position very clear yesterday of 22 what I meant by that. Whether, had it been at 23 3 o'clock in the afternoon and I was sitting in 24 my office and this comes. With time I would 25 have replied differently perhaps, but I've</p> <p style="text-align: center;">Page 94</p>	<p>1 that you're giving to it. 2 Q. Did you appreciate that by sending the 3 text and by speaking to Mr Levy you could 4 have been undermining the investigation 5 entirely? 6 A. No, for the reasons I have just explained 7 to you. 8 Q. Can you just go to C5871 please. This is 9 the email that Mr Rocca sent to you on 8 10 March 2021. If we just go to point two, it 11 says there: 12 "The defence have been laying the 13 groundwork for an abuse or fair trial 14 arguments set around the treatment of JL and 15 how both he and his communications devices 16 were handled during the investigation. You 17 will recall that they were returned unopened 18 and of course they will argue that this 19 impacts on their ability to have a fair trial and 20 that the differential treatment amongst other 21 things is an abuse of process, etc. You will 22 have noted that they even go as far as 23 suggesting that with an even-handed 24 approach, JL would have appeared charged 25 on the indictment."</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 Do you remember receiving this email? 2 A. Yes. I mean, this was much later on. Is 3 this 8 March 2021? 4 Q. 2021, yes. 5 A. I remember seeing it, yes. 6 Q. Did you appreciate that if the defence did 7 make an abuse argument about the treatment 8 of Mr Levy, that your correspondence with 9 and conversation with Mr Levy may have to 10 be put into evidence? 11 A. Yes, but their thinking and their decision 12 on that was one they had taken independently 13 themselves. I am just re-reading the 14 paragraph again. (Pause) Yes. 15 Q. In relation to meeting Mr Baglietto, you 16 said yesterday that you didn't pause for 17 thought as to whether you should be meeting 18 Mr Baglietto because it was crisis 19 management at that stage. What was the 20 crisis that you were crisis managing? 21 A. Well, it was the reason why in the 22 morning of 13 May, Mr McGrail asked that 23 he wanted to see me and therefore that is 24 what I was doing. The first letter from 25 Hassans had arrived. We discussed it. If I</p> <p style="text-align: center;">Page 97</p>	<p>1 A. Well, maybe crisis is the wrong word of 2 describing it. I mean, there was certainly a 3 situation that Mr McGrail thought he should 4 discuss with me and the DPP and I agreed 5 and the letter, I think 12 May letter is address 6 to me, so there were issues. I mean, the 7 allegations were very serious. So, maybe 8 crisis is not the right word, but it was 9 certainly an abnormal situation in which the 10 RGP was facing serious allegations set out in 11 that letter. 12 Q. Wasn't the real crisis that the RGP had 13 attempted to execute a search warrant against 14 James Levy? 15 A. Well, that is what provoked it all. 16 Q. And that was your concern? 17 A. My concern at that stage was that 18 something had to be dealt with at that time, 19 notably the Hassans's letter of the previous 20 night. 21 Q. Did you take advice from the DPP about 22 the appropriateness of meeting Mr Baglietto? 23 A. No, no. 24 Q. Should you have? 25 A. I don't think so because I only met him</p> <p style="text-align: center;">Page 99</p>
<p>1 remember correctly Mr McGrail was 2 preparing a response to the letter and in that 3 same email, if I remember, he suggests that 4 instead of him and me meeting with Lewis 5 Baglietto, that we two, or us two or the RGP 6 and me, should meet instead. So, what I was 7 doing there was just assisting Mr McGrail in 8 the reply to that letter, which was actually 9 addressed to me, if I remember correctly. 10 Q. What was the crisis that you were 11 managing? 12 A. The reasons why he wanted to see me, so 13 I guess he wanted to see me because in that 14 letter very serious allegations were being 15 made against the RGP and in particular 16 against Mr Richardson and he wanted legal 17 advice. 18 Q. So the crisis was the Hassans's letter? 19 A. Well, crisis, I mean, there was a situation 20 that needed to be managed. 21 Q. Because you used the expression "crisis 22 management" quite a lot yesterday, a number 23 of times. I am just trying to bottom out what 24 exactly was the crisis as Attorney General 25 you were managing?</p> <p style="text-align: center;">Page 98</p>	<p>1 anyway after the meeting of 13 May. 2 Already in the meeting of 13 May there is a 3 discussion about talking to Mr Baglietto. 4 Q. But you spoke to him before that, didn't 5 you? Did you take advice from the DPP 6 about the appropriateness of speaking to 7 him? 8 A. I don't think I spoke to him -- I don't 9 think I spoke to Mr ... I've been trying to 10 retrace those days and my recollection is that 11 I spoke to him for the first time on 13 May 12 after the meeting, because the meeting that 13 was supposed to take place between him, Mr 14 McGrail and me, I cancelled by email. It is 15 in the evidence. So, I wouldn't have called 16 him to cancel the meeting and then I had the 17 meeting with Mr McGrail. So I must have 18 called him after 13 May is what I have 19 worked out. 20 Q. Should you have taken the DPP along 21 with you to those meetings -- to the calls and 22 meetings with Mr Baglietto? 23 A. The calls? 24 Q. The calls. 25 A. No.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 Q. No? Should you have taken notes at 2 those meetings? 3 A. Mr Wagner, the calls were very short 4 calls. First of all, already from the meeting 5 of 13 May we are talking about 6 communicating with Lewis Baglietto, as 7 from the 15th it is absolutely clear. But 8 already after -- during the meeting of the 9 13th, and these were very short calls where 10 the most that I think was discussed, for 11 example, in this call of 13 May, from 12 recollection and from reading the transcript 13 in particular, was that Mr Baglietto in 14 addition to explaining the reasons I suppose 15 why he had sent his letter of 12 May, must 16 have informed me that Mr Levy would give a 17 no comment interview on Monday, 18th. 18 Because we talk about that on the meeting of 19 the 15th. 20 Q. Sorry, I am going to ask the question 21 again. Should you have taken notes of those 22 calls and meetings? 23 A. I don't -- I mean, apart from the big treaty 24 negotiations that we're doing, I don't take 25 notes of my other meetings.</p> <p style="text-align: center;">Page 101</p>	<p>1 McGrail because you were shocked about the 2 warrant and it happened very quickly. Is that 3 right? 4 A. Yes. 5 Q. You also say in your witness statement, I 6 can take you to it in a bit, that with the 7 "fighting to the death" comment that you 8 used over expressive and emotional language 9 which you now regret at 13 May meeting, is 10 that right? 11 A. That's right. I was not the only one, but 12 that's right. 13 Q. And you didn't pause for thought, this is 14 what your evidence is, you didn't pause for 15 thought about whether it was appropriate to 16 meet Mr Baglietto, because you were in 17 crisis management mode at that stage. Is that 18 right? 19 A. Well, as I've just told you, maybe crisis 20 management is not the appropriate 21 description of it. 22 Q. Yes. 23 A. But there was certainly a situation which 24 was not a normal situation. 25 Q. Mr Llamas, you are the Attorney General.</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. Are you aware that nobody took any 2 notes, at Hassans, the Chief Minister, or you 3 of any of the interactions that took place 4 between Mr Levy, Mr Picardo, you and Mr 5 McGrail -- sorry, and Mr Baglietto? 6 A. I mean, my interactions were very short 7 interactions which were managing the 8 situation with Mr Baglietto. My interaction 9 with Mr Levy, you've got it in evidence. I 10 mean, that's all the interaction that I had. 11 Q. But no notes? 12 A. No, no notes. 13 Q. So just to recap on this, I just want to get 14 -- talk a bit about your frame of mind, you've 15 said you texted "Don't worry" to Mr Levy in 16 part because you were working late and were 17 tired that evening. Is that right? 18 THE CHAIRMAN: And his mind was on 19 other matters. 20 MR WAGNER: And your mind was on 21 other matters. Is that correct? 22 A. Yes. 23 Q. You've said you didn't consider the 24 implications of 12 May meeting at the time 25 between you and Mr Picardo and Mr</p> <p style="text-align: center;">Page 102</p>	<p>1 At some point, did the shock, the emotion 2 and the tiredness wear off and give you the 3 opportunity to give these issues some thought 4 from a legal perspective? 5 A. Which of the issues? 6 Q. Any of them relating to Op Delhi. 7 A. Well, I think during those days, my focus 8 was to help the RGP in the process that was 9 agreed on during those meetings in helping 10 them refute and reply to the letters from 11 Hassans and in agreeing with them and 12 discussing with them a way forward, 13 considering the situation in which we found 14 ourselves and indeed, I thought that 15 everybody was happy with it because, as I 16 showed you yesterday, one hour into a one 17 and-a-half our meeting with Mr McGrail on 18 15 May, the second meeting, he thanks me -- 19 and the DPP -- he thanks me for what was it, 20 the consultation. 21 Q. Yes. We will come to that. I want to ask 22 you about 6 April meeting with the DPP. 23 A275 please, paragraph 21. Well, at 24 paragraph 20 you said: 25 "I myself had no further involvement with</p> <p style="text-align: center;">Page 104</p>

<p>1 the Criminal Investigation until about eleven 2 months later ..." and you underline eleven 3 months later. Then in the next paragraph: 4 "It was not until early-April 2020 5 [underlined] that the Criminal Investigation 6 was brought to my attention again. On this 7 occasion it was as a result of a call I received 8 from the Direction of Public Prosecution ... 9 who wished to discuss with me certain 10 aspects of the RGP's investigation. ... the 11 DPP rarely seeks to discuss criminal cases 12 with me and typically acts completely 13 independently from me." 14 You said in your evidence yesterday, you 15 say, "The two principal issues which the DPP 16 had brought to my mind were rationalisation 17 of charges and ownership and my focus in 18 that meeting was exclusively the matters the 19 DPP had brought to my attention the day 20 before." Do you remember giving that 21 evidence? 22 A. Sorry? 23 Q. You gave that evidence yesterday. Is that 24 right? 25 A. Yes.</p> <p style="text-align: center;">Page 105</p>	<p>1 was to discuss the people who might be 2 dragged in by the investigation. Would you 3 agree? 4 A. On the face of that email of course, but 5 not what we discussed, or the main thing we 6 discussed the following day, or that same 7 day. 8 Q. And Mr Rocca said in his evidence on 9 day 10, and I am going to ask for it to be put 10 up but just for the note it is page 203, line 7, 11 he was asked who were the high-profile 12 people that he wants to raise. He said, "the 13 Chief Officer of the Borders and Coastguard 14 Agency, it was the Chief Minister, it was 15 Haim Levy, it was Mr Gaggero from Blands, 16 also it involved Mr Perez who was the 17 former Commanding Officer of the -" I 18 guess the Royal Gibraltar Regiment. Now, 19 can we just go to C4 732? This is the letter 20 that your lawyers drafted on your behalf. 21 Did you check it before it went out on 5 June 22 2020? 23 A. I must have. 24 Q. Well, you will have, because you are the 25 Attorney General.</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. If we just go to C3 313, please, you have 2 already been shown this, that it was you who 3 emailed Mr Rocca saying, "I'm not cited on 4 this, M." So would you agree it was you who 5 asked to be cited on the issue, not the DPP 6 who contacted you? 7 A. No, you misrepresent the situation, Mr 8 Wagner. If you go the previous email - so 9 that's an email from Mr Fischel to the RGP in 10 which I am in copy as indeed is the DPP, so I 11 don't know why I'm receiving this email. 12 Q. But you said to the DPP, "I'm not cited in 13 this"? 14 A. Yes, of course I said it. 15 Q. Yes. If you go above the email to the 16 DPP's email, he said, "Hi Michael, this is 17 something we're going to have to discuss 18 soon because it does have very serious 19 implications in terms of the people that might 20 be dragged in." When the DPP emailed you, 21 he didn't mention the rationalisation of the 22 charges or the ownership issue, did he? 23 A. In that email, obviously not. 24 Q. In that email, no, and in fact the purpose 25 of the meeting from the DPP's perspective</p> <p style="text-align: center;">Page 106</p>	<p>1 A. Yes. 2 Q. So, if we just pick it up, it is the second 3 paragraph from the bottom that begins, "Far 4 from seeking". It says, "Far from seeking to 5 interfere with that reason, I had no further 6 involvement with the criminal investigation 7 until 11 months later when in early April 8 2020 the DPP called me to discuss the 9 Government's position in relation to the 10 ongoing issues about the ownership of a 11 computer platform and its software that the 12 HO, the Government uses, which the 13 criminal investigation related". You were 14 writing that letter to the Gibraltar Police 15 authority. Why did you not refer to the 16 actual reason the DPP contacted you, which 17 was about the high-profile people? 18 A. Because what I recall there is what we 19 spoke - I don't even remember speaking 20 about the people who were potentially going 21 to be dragged in. It must have been 22 mentioned, because that is what he says in 23 his email, but for me as I've said, that 24 conversation was predominantly on 25 rationalisation and ownership and that is my</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 best recollection of that conversation, Mr 2 Wagner. 3 Q. Well, that paragraph is misleading, is it 4 not? 5 A. Sorry? 6 Q. That paragraph is misleading, is it not, 7 Mr Llamas? 8 A. I would not agree with that. 9 Q. You then go on to say, and I will not read 10 it to you because you were taken to it 11 yesterday, that you discussed the warrant 12 against Mr Levy with the DPP and expressed 13 your concern about it. You were surprised to 14 hear that yesterday and then in the final 15 paragraph you say - sorry just a little bit 16 further on. Just go up again. You say in the 17 penultimate paragraph, "During the 18 discussion the DPP explained to me the RGP 19 had drawn up all these charges. You were 20 alarmed, and also you were alarmed by the 21 proposal to obtain and issue a search warrant 22 against a senior lawyer. You then say below, 23 "I asked to meet the Commissioner of Police 24 in relation to these two matters and we did so 25 on 7 April." So, by "those two matters" in</p> <p style="text-align: center;">Page 109</p>	<p>1 not discussed in that meeting. Mr McGrail 2 has said it; Mr Richardson has said it; Mr 3 DeVincenzi has said it, and I have said it. So, 4 I am sure that that part, namely what was 5 discussed in the meeting of 7 April, is not 6 correct, and that made me think back to what 7 the discussion with the DPP had been the 8 previous day because obviously both things 9 are linked, and I see that in his evidence, the 10 DPP has made it very clear that we did not 11 discuss the search warrants on 6 April. So, I 12 have given it a lot of thought, as you can 13 imagine, last night, and the only conclusion I 14 can reach is that contrary to the suggestion 15 that Mr Santos made to me yesterday that 16 because this letter is more contemporaneous 17 to the events than my witness statement and 18 therefore more likely to reflect the true 19 position, I have come to the conclusion that 20 the opposite is almost certainly the case and 21 I'll tell you why because this comes at the 22 back of the four meetings that had just taken 23 place: the meeting of 7 April and the three 24 meetings of May 2020 and I honestly believe 25 I got confused and that confusion is reflected</p> <p style="text-align: center;">Page 111</p>
<p>1 the letter at least you meant the ownership - I 2 am sorry, the charges and the warrants. Is 3 that right? 4 A. Yes. I have given a lot of thought to this 5 letter, Mr Wagner, since yesterday because 6 that's - I was taken very much by surprise 7 when I saw this in this letter, and I will tell 8 you why, because it is not my - the 9 discussion of the search warrant is not 10 something that I had remembered and indeed 11 I have not stated that in my witness 12 statements. So, I have been going over the 13 two issues, because there are two issues in 14 these paragraphs. The first one was what 15 was discussed between the DPP and me, and 16 the second one what was discussed in the 17 meeting of 7 April with Mr McGrail, Mr 18 Richardson and Mr DeVincenzi. So, if you 19 go to the end, the top of page 4 of that letter, 20 please, so there in the last sentence I say, 21 referring to the meeting of 7 April, "We also 22 discussed the proposal to obtain and execute 23 a search warrant against Mr Levy". We've 24 got evidence from the four participants of 25 that meeting that the search warrants were</p> <p style="text-align: center;">Page 110</p>	<p>1 in that letter in those two paragraphs. 2 Q. Yes. You then say in the letter, or your 3 lawyer says, "The outcome of that discussion 4 was that we reached a clear understanding 5 that the RGP would not take any further 6 action until they had considered my advice 7 about the rationalisation of the charges. It 8 was clear beyond peradventure that nothing 9 would happen until we met again." Do you 10 accept that the long description in the 11 previous paragraphs about the conversation 12 about the warrants on 7 April meeting made 13 it sound like and bolstered your argument in 14 the next paragraph that you had clearly 15 agreed with Mr McGrail not to take any steps 16 including the execution of a warrant? 17 A. Yes, absolutely, but I'm explaining to you 18 now that that was a mistake. It must be a 19 mistake. I must have confused the meeting. 20 Q. It was a very important mistake, was it 21 not, Mr Llamas? 22 A. In what sense? 23 Q. Because this was a letter - it was not any 24 old letter - it was a letter you sent to the 25 Gibraltar Police Authority to justify what you</p> <p style="text-align: center;">Page 112</p>

<p>1 said was your loss of confidence in the 2 Commissioner of Police. 3 (12.31) 4 A. No, I think it's not germane to that 5 question at all. This letter comes after the 6 letter of 29 May and it comes after the lie and 7 therefore those were the reasons why that - 8 well, more than the lie, the breach of trust 9 that I consider had occurred between Mr 10 McGrail and myself, and that is why I 11 submitted that letter. My lasting confidence 12 in Mr McGrail is irrelevant to the retirement 13 process. 14 Q. Well, is it? 15 A. Yes. 16 Q. You said that you, the Governor and the 17 Chief Minister were coordinating these 18 letters; is that correct? 19 A. No, we were --- the three of us had our 20 positions on this and they were submitting --- 21 my loss of confidence is as irrelevant to what 22 happened to Mr McGrail as what your loss of 23 confidence may have been. The loss of 24 confidence of the Attorney General is 25 completely irrelevant to that process.</p> <p style="text-align: center;">Page 113</p>	<p>1 facts that you now accept, that could have 2 borne on his decision whether to exercise his 3 powers? 4 A. I don't think that that was influenced by 5 anything in this letter. It was subsidiary to 6 what was happening under his own loss of 7 confidence in Mr McGrail. 8 Q. So you are the Attorney General and you 9 are saying that the Governor would have just 10 ignored your letter? 11 A. Yes, but as I told you, that process had 12 nothing to do with me and I don't think that 13 this letter contributed in any way. It showed 14 that the Attorney General had also lost 15 confidence in Mr McGrail but after the letter 16 of --- Mr McGrail's letter of 29 May, that was 17 hardly surprising. 18 Q. So A276 please, paragraph 22, I think we 19 are already there, you say, "During our 20 discussion [this is in 2022 when you write 21 this statement] the DPP confirmed to me (a) 22 on the basis of the information available to 23 the DPP it was clear that there would be 24 failures in the National Security system of 25 Gibraltar ..." and if you go down, "(b)</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. You said --- you were asked, "Did you 2 see each other's letters," the Governor, the 3 Chief Minister and you and you said, 4 "Maybe. Is that correct? 5 A. I don't know for sure, Mr Wagner but --- 6 Q. What is your best recollection? 7 A. My best recollection is that I saw them 8 quite soon after they were sent. 9 Q. And the others will have seen yours. Is 10 that correct? 11 A. I can't remember. 12 Q. So would you accept that it was the 13 Governor at this very moment, 5 June, who is 14 deciding whether to exercise his section 13 15 powers in relation to Mr McGrail to force 16 him to retire. Is that right --- to resign, sorry. 17 A. I can't remember the chronology of that. 18 Q. You can take it from me that on 5 June 19 that was exactly the moment when the 20 Governor was deciding whether to exercise 21 his section 13 powers. Do you agree? 22 A. If you say that was the case, I mean, I 23 can't confirm it myself. 24 Q. Do you agree that if the Governor saw 25 this letter with the misrepresentation of the</p> <p style="text-align: center;">Page 114</p>	<p>1 Hassans held shares in the rival company 36 2 North. Mr Levy was potentially a person of 3 interest. Their civil servant, Mr Sanchez, 4 was one of the suspects. The chief executive 5 officer of the border and coastguard agency 6 may have been implicated and the ownership 7 of the NSCIS platform was contested, there 8 was no formal written contract." Then you 9 say, "The DPP also informed me ..." and you 10 mention the ownership issue and the charges. 11 Do you accept that you have given three 12 materially different accounts of this meeting 13 in 5 June letter, then in your witness 14 statement and then in your oral evidence? 15 A. What's the difference between my 16 witness statement and my oral evidence? 17 Q. I suppose now you have gone back on the 18 search warrant being mentioned but certainly 19 in the 5 June letter and the witness statement 20 ---- 21 A. Yes, and I have explained to you that that 22 was a confusion in the 5 June --- which is 23 supported by the evidence from the other 24 persons and officials who took part in those 25 meetings.</p> <p style="text-align: center;">Page 116</p>

1 Q. Is another possibility that you tailored
 2 your accounts to fit the needs of the
 3 particular situation?
 4 **A. Not at all. It was a mistake, an innocent**
 5 **mistake, a confusion arising from the**
 6 **consecutive nature of the meetings**
 7 Q. It is not the only innocent mistake that
 8 you have admitted, is it?
 9 **A. Like what?**
 10 Q. You accepted yesterday that your
 11 message to the Chief Minister on 13 May,
 12 that the DPP had strongly advised against the
 13 warrant, was wrong?
 14 **A. It was a mischaracterisation of what I was**
 15 **told, yes, of no consequence to the lie**
 16 **because that mischaracterisation had nothing**
 17 **to do with the lie, but, yes.**
 18 Q. I am going to come back to that in a
 19 moment but before we leave the 7 April
 20 meeting, you said yesterday that at that
 21 meeting on 7 April "I don't think I was even
 22 speaking to him," that is Mr McGrail, "as
 23 Attorney General to the Commissioner of
 24 Police. It was more a conversation by two of
 25 the most senior persons in the law

Page 117

1 enforcement team in Gibraltar." You also
 2 said, "The major purpose of the meeting was
 3 to tell him to be careful." Is it right you felt
 4 you were not actually talking as the Attorney
 5 General?
 6 **A. I wasn't giving him legal advice. That's**
 7 **my view and Mr Richardson's view with**
 8 **which I agree. I was just telling him**
 9 **generally. I enjoy a more panoramic view of**
 10 **what's happening in Gibraltar and, therefore,**
 11 **I saw, as they had seen, the potential for**
 12 **reputational risks but this investigation ---**
 13 **and indeed I didn't know at the time the**
 14 **extent to which they actually had seen that**
 15 **and, therefore, all I was doing was telling**
 16 **him, "Look, we're at a particularly critical**
 17 **moment in our history, just be careful how**
 18 **you move forward."**
 19 Q. Do you have any function as Attorney
 20 General to meet with the Commissioner of
 21 Police and do anything but give him legal
 22 advice?
 23 **A. I thought this was, as I said yesterday,**
 24 **friendly advice between Mr McGrail and I.**
 25 **We got on well at that moment in time and I**

Page 118

1 **was just giving him the benefit of what I**
 2 **have said. I know more than he does, what's**
 3 **happening of direct importance to Gibraltar**
 4 **at the moment. We all saw the risks of this**
 5 **case and I felt I was doing him a favour**
 6 **almost in the sense of be aware, be careful. I**
 7 **mean, that's what I was telling him, so, yes, I**
 8 **think am perfectly entitled to do that.**
 9 Q. Just to be absolutely clear, you were
 10 giving him private advice, not legal advice?
 11 **A. It wasn't legal advice.**
 12 Q. You were giving him private advice to be
 13 careful?
 14 **A. Yes.**
 15 Q. If that was not legal advice, was it
 16 political advice?
 17 **A. No, it's not political in the sense that my**
 18 **only concern was that because of the**
 19 **ingredients and this investigation, that it was**
 20 **handled properly. I mean, that was my only**
 21 **concern.**
 22 Q. But not legally properly? You were not
 23 giving him legal advice?
 24 **A. No.**
 25 Q. And when you said "handled properly"

Page 119

1 did you mean politically properly?
 2 **A. Politically? Probably, no, not politically**
 3 **properly, just properly, administratively**
 4 **properly.**
 5 Q. Looking back, do you have any concern
 6 now that you were giving advice that was not
 7 legal advice, was not as the Attorney General
 8 and, as you were telling the Commissioner of
 9 Police in a high profile investigation to be
 10 careful and how that might be interpreted?
 11 **A. I have absolutely no problems with that,**
 12 **that is exactly what I thought it was**
 13 **appropriate for me to tell him as friendly**
 14 **advice to him.**
 15 Q. I know you say it is friendly and you
 16 were trying to help him but is not private
 17 advice, telling him to be careful and to take
 18 certain steps that are not legal, is that not the
 19 definition of interference?
 20 **A. Not at all.**
 21 Q. What else is it?
 22 **A. We have already gone over the issues,**
 23 **right. We have gone over the complexity of**
 24 **the investigation itself, we have already gone**
 25 **over the reputational risks that the RGP itself**

Page 120

<p>1 had already identified, we have already gone 2 over the particularly critical moment that we 3 were traversing then on treaty negotiations or 4 Gibraltar's future relationship with the EU, 5 all this is happening, and, look, another issue 6 is that I'm not passing here any valued 7 judgment on Mr McGrail's policing style but 8 I think it's no secret that Mr McGrail was not 9 known for his tact. He was more a man of 10 action than thoughts, more somewhat of a 11 bull in a China shop and others will describe 12 his policing style in their own way. My 13 experience of that, and I like to base it on my 14 own experience, was that when I was 15 required to pick up the pieces after the airport 16 incident, where I spent most of 2017 and 17 2018 drafting an Armed Forces Gibraltar Act 18 and the protocol on the exercise of criminal 19 jurisdiction in Gibraltar, I spent a lot of time 20 with officials from the Ministry of Defence at 21 that time working in particular on the Act 22 and I saw firsthand --- I mean, Mr McGrail 23 and all of you are making a lot about the 24 public apologies and statements that were 25 made at the time by members of the UK</p> <p style="text-align: center;">Page 121</p>	<p>1 A. Yes. 2 Q. Thank you. Where in your witness 3 statement do you say any of that? 4 A. Mr Wagner, I haven't written everything 5 in the witness statement. I think it's implicit 6 from my paragraph 23 where I am telling 7 him to be careful and to be prudent, that that 8 is the reasons --- if you are expecting me to 9 say --- 10 Q. I am sorry, where does it say "careful" 11 and "prudent" in paragraph 23? 12 A. I will tell you where it is. I am sorry, it is 13 paragraph 29, where I say, "I, therefore, 14 advised Mr McGrail that I considered it vital 15 that the investigation should proceed and be 16 conducted prudently and with tremendous 17 care." It is there. That is, as I said yesterday, 18 the reason for my meeting with Mr McGrail. 19 I have now, and I thank you for having given 20 me the opportunity to explain all the reasons 21 why prudently and tremendous care --- if you 22 are now telling me why did you not in your 23 statement explain why I felt that I had to give 24 him that advice, look, I didn't say it but these 25 are the reasons. They were obvious, it was</p> <p style="text-align: center;">Page 123</p>
<p>1 armed forces and the Ministry of Defence 2 and even UK government ministers. I'm sure 3 those people had their reasons for doing that 4 but what I discovered in that year 2017 and 5 2018 where I worked with officials to the 6 very top, including the current chief of 7 defence staff, is that the wound that had been 8 created with the MOD --- the MOD being the 9 embodiment of British sovereignty in 10 Gibraltar, the wound that had been created by 11 the way those three senior officials had been 12 arrested, ran very deep. They run very deep 13 and the true position, the way they really felt 14 as I saw at the time, is as expressed by CDF, 15 Mike Walliker, in his witness statement to 16 this Inquiry, so, quite frankly, I had a concern 17 that because of his policing method and style 18 and what I had seen the consequences of that, 19 as I had seen it then, I was concerned and 20 you put all those things together, complexity 21 of the case, reputational risk, a critical 22 moment in our history, and his policing style. 23 "Ian, take care, Ian, be prudent," that is the 24 summary of that meeting. 25 Q. Have you finished?</p> <p style="text-align: center;">Page 122</p>	<p>1 obvious to everyone. 2 Q. There is no documentary record in the 3 thousands of documents before this Inquiry 4 that you held any of those concerns about Mr 5 McGrail at the time, is there? 6 A. No. 7 Q. Just answer the question, is there 8 anything in a text message --- 9 A. No. 10 Q. --- in an email, did you put it in the letter 11 to the GPA about your concerns around Mr 12 McGrail? 13 A. No. 14 Q. And in your two witness statements you 15 do not mention any of those points at all? 16 A. No. 17 Q. It has taken you four years to come on the 18 stand when you are having a difficult time to 19 make those points? 20 A. A difficult time about what, Mr Wagner? 21 It's obvious. 22 Q. You said yesterday that what you said to 23 Mr McGrail on 7 April was just pure advice, 24 "he chose to ignore it, which is fine." Are 25 you saying not legal advice?</p> <p style="text-align: center;">Page 124</p>

<p>1 A. Yes, exactly. That is exactly what I say.</p> <p>2 Q. And you said, "I thought in the context of</p> <p>3 the meeting he should have understood what</p> <p>4 I meant"?</p> <p>5 A. Yes.</p> <p>6 Q. But it was an implication. Is that right?</p> <p>7 A. Yes, I have come to accept that, yes.</p> <p>8 Q. You have come to accept that, so C4732,</p> <p>9 just scroll through that, keep going further</p> <p>10 down, you say in the second paragraph, "The</p> <p>11 outcome of that discussion was that we</p> <p>12 reached a clear understanding that the RGP</p> <p>13 would not take any further action until they</p> <p>14 considered my advice about the</p> <p>15 rationalisation of the charges and then the</p> <p>16 CoP would come back to see me again. It</p> <p>17 was clear beyond peradventure." Do you</p> <p>18 accept that that was misleading?</p> <p>19 A. In my mind, it was clear on 7 April. For</p> <p>20 me, if I have taken the unprecedented step to</p> <p>21 discuss this with the Commissioner of Police,</p> <p>22 and I am telling him to be prudent and to take</p> <p>23 tremendous care, I meant what I meant and,</p> <p>24 look, at a minimum it should have been clear</p> <p>25 to him that no major steps would have been</p> <p style="text-align: center;">Page 125</p>	<p>1 that where I could be of assistance to him</p> <p>2 which is what I was trying to be.</p> <p>3 Q. Do you agree ---</p> <p>4 A. Or as I said yesterday, we did not shake</p> <p>5 hands. The meeting did not end with Ian,</p> <p>6 Michael would reach this agreement, did not</p> <p>7 send him an email telling him, "Ian, we've</p> <p>8 agreed this and that today." I accept all of</p> <p>9 that but for me, operating at the level that we</p> <p>10 both were, I was just very disappointed.</p> <p>11 Q. But your level in criminal law was</p> <p>12 nowhere?</p> <p>13 A. Mr Wagner, I have just told you it wasn't</p> <p>14 legal advice.</p> <p>15 Q. Do you regret using those words "Clear</p> <p>16 beyond peradventure" ----</p> <p>17 A. No, because ----</p> <p>18 Q. --- in a letter justifying Mr McGrail being</p> <p>19 --- well, effectively being pushed out of his</p> <p>20 post?</p> <p>21 A. You are not serious about that comment,</p> <p>22 are you?</p> <p>23 Q. I am asking a question.</p> <p>24 A. Well, I think it's an absurd question to ask</p> <p>25 and I don't think that this had anything to do</p> <p style="text-align: center;">Page 127</p>
<p>1 taken until rationalisation and ownership had</p> <p>2 been established in the knowledge that</p> <p>3 rationalisation was something which the DPP</p> <p>4 had told me could be done very quickly and</p> <p>5 on ownership, what I did as I said yesterday,</p> <p>6 immediately after that meeting I started</p> <p>7 putting pressure on government officials to</p> <p>8 provide the Government statement on</p> <p>9 ownership because they had been dragging</p> <p>10 their feet for a very long time and the RGP</p> <p>11 had been asking for it for a very long time</p> <p>12 and the government was not producing it and</p> <p>13 it worked because by 4 May, as I say in my</p> <p>14 witness statement, the RGP received the</p> <p>15 Gibraltar government's position on</p> <p>16 ownership which, for the last four or five</p> <p>17 months, they had been asking for and not</p> <p>18 getting it, so that is it.</p> <p>19 Q. Do you agree that there is a very big</p> <p>20 difference between an implication and an</p> <p>21 agreement which was clear beyond</p> <p>22 peradventure?</p> <p>23 A. I think that officials at a senior level, it</p> <p>24 should have been clear to Mr McGrail that I</p> <p>25 sought to start a connection between us on</p> <p style="text-align: center;">Page 126</p>	<p>1 with that.</p> <p>2 Q. Do you regret using that expression,</p> <p>3 "clear beyond peradventure"?</p> <p>4 A. For me, it was.</p> <p>5 Q. I want to ask you about your involvement</p> <p>6 in the GPA process at B1365 please. This is</p> <p>7 the 22 May letter from the GPA, the yellow</p> <p>8 sections are the parts which the Chief</p> <p>9 Minister added in after Mr Britto's first draft</p> <p>10 and he says further down to probity and</p> <p>11 integrity, "It was communicated to me that</p> <p>12 both the Governor and the Chief Minister felt</p> <p>13 that their dealings with you had left them</p> <p>14 with a sense that you were lacking in both</p> <p>15 probity and integrity ... the maritime incident</p> <p>16 one case in point ..." and this is the words of</p> <p>17 the Chief Minister, "this is very serious</p> <p>18 indeed. I think you need to reflect carefully</p> <p>19 on this. The situation we are in is one where</p> <p>20 both the Governor and the Chief Minister</p> <p>21 respectively have expressed this view. It's</p> <p>22 not one of them who has expressed this view,</p> <p>23 which would be bad enough, but both of</p> <p>24 them," and then further down, "additionally,</p> <p>25 the authority is informed that the Attorney</p> <p style="text-align: center;">Page 128</p>

<p>1 General has also expressed the same 2 feelings." Do you remember seeing this 3 letter before it went out? 4 A. Yes. 5 Q. Just to make that good, B1419, at 1951, 6 Mr Picardo sends you something and says, 7 "Can you review, it contains references to 8 you, I want to make sure you are 9 comfortable." You say, "Sure," straight away 10 and then you put your thumb up, "Yeah, call 11 you now." I will not take you to it but the 12 timing works exactly with where Dr Britto 13 sends the Chief Minister his letter, his draft at 14 1842, that is B1436. Do you remember 15 receiving that draft letter before it went out? 16 A. Can I see --- sorry, can we go back to the 17 previous page? 18 Q. Did you want to see the letter? 19 A. No, I wanted to see the WhatsApp 20 exchange which is on the screen right now. 21 Q. Yes. 22 A. Can I see what is the media ---- 23 MR SANTOS: I think it is 6793. 24 THE WITNESS: Okay, that's what I 25 thought.</p> <p style="text-align: center;">Page 129</p>	<p>1 other than that 12 May meeting and I 2 attended one meeting with the Governor and 3 the Chief Minister on 5 June in my capacity 4 as their legal adviser ... and I sent a letter on 5 5 June replying to various serious and untrue 6 allegations." Why did you leave out all of 7 those different inputs you had in the GPA 8 process in this witness statement? 9 A. Because my involvement was --- I read 10 that letter, I don't think I even received it by 11 email. It was just a cursory look at it and I 12 had no participation in the process, Mr 13 Wagner. The only thing I have omitted from 14 my witness statement is a meeting of 7 June 15 which I had forgotten about but my --- and 16 that my 5 June involvement started actually 17 on 4 June on exactly the same point, on the 18 procedural error. 19 Q. Your name and your post as Attorney 20 General were used with your consent in the 21 22 May letter, were they not? 22 A. Yes. 23 Q. How can you then say you had no 24 participation in the GPA process? 25 A. Because I didn't have an active role. I</p> <p style="text-align: center;">Page 131</p>
<p>1 MR WAGNER: (To the witness): It is the 2 incident at sea ---- 3 A. So you've got it completely wrong, Mr 4 Wagner. 5 Q. Did you see the letter before it went out? 6 A. I just told you before that I thought --- I 7 think I did. 8 Q. So you allowed your name to be included 9 in the letter? 10 A. Yes. 11 Q. And you allowed your name to be 12 included in the context of having deep 13 concerns about the probity and integrity of 14 Mr McGrail? 15 A. Because of the breach of trust that I 16 thought had occurred. 17 Q. Mr Santos took you this morning to 18 references to multiple messages and meetings 19 you had with the Chief Minister and 20 particularly Mr Pyle about the process that 21 the GP was exercising. Is that right? 22 A. Yes. 23 Q. So when we look at A270, paragraph 6(b) 24 you say, "I had no participation in the 25 procedure leading to Mr McGrail's cessation</p> <p style="text-align: center;">Page 130</p>	<p>1 just said, "Look, I am happy with my name 2 to be put to this letter." That's all there was 3 to it. I was stating the obvious by then. 4 Q. I want to ask you about the "strongly 5 advised" WhatsApp. You were not sure 6 when you say you corrected your mistake. 7 A. Yes, I said that. 8 Q. Are you still not sure? 9 A. Absolutely not. My position on that 10 correction is the same as I expressed 11 yesterday. 12 Q. That text had a number of effects and I 13 just want to take you through some of them. 14 First of all, B1417, these are messages 15 between you and Mr Picardo, and this is 16 when the message actually happened, "spoke 17 to the DPP, categorical, whilst he told the 18 RGP that an interview with J L would likely 19 be necessary he strongly advised against the 20 search warrant ... he lied to us both." Is that 21 what that means? 22 A. Yes. 23 Q. "Exactly, he certainly gave us the 24 impression that the search warrant position 25 was sanctioned by the DPP," and you say,</p> <p style="text-align: center;">Page 132</p>

<p>1 "(Inaudible) caught DPP trying to cover his 2 back, I've told DPP not to say or do anything 3 without speaking to me first." Mr Picardo, 4 "Incredible, there's some game afoot here." 5 Would you agree that the first effect of your 6 mistake was that it appears to have made the 7 Chief Minister even more angry than he 8 already was? 9 A. No, I think he was already very angry. 10 Q. I am asking if he reacted in a way which 11 makes you think that he was not made more 12 angry? 13 A. No, he was already convinced that he had 14 lied to him and this just, as you can see from 15 his reaction, it's not that he was angrier more 16 than he was before. 17 Q. Where is the evidence that he was already 18 convinced that Mr McGrail had lied to him? 19 A. Because from the exchange they had on 20 12th --- in the meeting earlier on. 21 Q. He said, "You lied to me, Mr McGrail"? 22 A. He said, "I cannot believe that that is the 23 case, I cannot believe that the DPP has 24 advised you to proceed by search warrant." 25 Q. At that point he did not know whether he</p> <p style="text-align: center;">Page 133</p>	<p>1 significantly than if you had texted the 2 accurate impression? 3 A. No, I was just sending the text to the 4 Chief Minister and this simply confirmed 5 what we thought --- what he had told us in 6 the meeting. 7 Q. If we go to A256 --- I know it is one 8 o'clock, I would be very --- this section is not 9 going to take very long and I have not got 10 much more but can I --- 11 THE CHAIRMAN: Yes, just finish this 12 section while you are on it. 13 MR WAGNER: Yes, if that is okay. (To the 14 witness): A256, paragraph 26.5 to 26.6, this 15 is the Governor --- 16 A. Sorry, this is the second affidavit? 17 Q. No, this is Mr Pyle's first affidavit. He 18 says, "I clearly remember saying something 19 along the lines of ..." sorry, I should explain. 20 This is in the meeting he has with the Chief 21 Minister on 15 May, so three days later. 22 "The Chief Minister then outlined his belief 23 that Mr McGrail had made a serious error of 24 judgment with regard to the execution of a 25 search warrant against Jaime Levy, gone</p> <p style="text-align: center;">Page 135</p>
<p>1 had been lied to? 2 A. No, but he formed a very strong view of 3 it. 4 Q. You were being sent to check what the 5 DPP had said? 6 A. That's correct. 7 Q. And you came back with a misleading --- 8 you gave a misleading impression that the 9 DPP had strongly advised against it, did you 10 not? 11 A. I gave a misleading impression of 12 something that was no consequence either to 13 his anger or to what was the lie because what 14 I reported back is irrelevant to the lie. The 15 lie is that Mr McGrail told the Chief Minister 16 that the RGP had received advice from the 17 DPP to proceed by search warrant. That 18 mischaracterisation that I make in that 19 WhatsApp is relevant to the lie. 20 Q. Mr McGrail says that he did not say that, 21 he said words to the effect of the team had 22 been getting advice from the DPP. Just for 23 the sake of argument assume that that is the 24 correct recollection, do you agree that this 25 text would have changed the position very</p> <p style="text-align: center;">Page 134</p>	<p>1 against the advice of the DPP and AG." Do 2 you accept that three days later it appears that 3 Mr Picardo told Mr Pyle that Mr McGrail 4 had gone against the advice of the DPP 5 A. Yes, obviously --- well, what this shows 6 is what Mr Pyle is recording. Is this the 7 meeting of 18 May? 8 Q. It is 15 May, I think. 9 A. Was there a meeting on 15 May? 10 Q. Have I got that wrong? I think they met 11 on the 15th, the Chief Minister and Mr Pyle 12 met on 15 May. 13 A. Anyway, when I was trying to retrace 14 when I would have told the correct position 15 to the Chief Minister when it was explained 16 by the DPP in the meeting of the 13th, the 17 first --- it is clear by the letter of 5 June, the 18 Chief Minister's letter to the GPA of 5 June - 19 -- if you look at that letter he sets out the lie 20 exactly as it was. The previous document --- 21 the only previous document they had been 22 able to find is the Chief Minister's records of 23 his meeting with Mr Pyle on 18 May where 24 he uses an expression on the lines of, "He has 25 misled us."</p> <p style="text-align: center;">Page 136</p>

<p>1 Q. I just want to be clear about this point 2 here. Do you agree that on the 15th the 3 Governor is saying that the Chief Minister 4 has told him that Mr McGrail went against 5 the advice of the DPP? 6 A. Yes, that is what it says. 7 Q. That must have come from your text 8 message; do you agree? 9 A. Yes, I agree with that, yes. 10 Q. Then at B5419, this is the Hassans letter 11 of that day ---- 12 A. Yes, this is where it appears as well. 13 Q. Yes, so at the bottom, the DPP advised 14 the Commissioner against the making of 15 those applications, so do you agree that that 16 must have come from your mistake? 17 A. Yes. 18 Q. Then at B1777, this is an email that Mr 19 Pyle sent to the FDCO on 21 May. It says -- 20 -- 21 A. Yes, I am very aware of these documents, 22 Mr Wagner, because I have been --- I have 23 retraced it and it appears largely that Mr Pyle 24 --- apart from the Hassans letter, it is Mr Pyle 25 and indeed until the end of the process</p> <p style="text-align: center;">Page 137</p>	<p>1 telling you is that after discovering the real 2 position on the 13th I must have told the 3 Chief Minister and what I am telling you is 4 that the only evidence that I have found 5 trying to trace when is --- the earliest I have 6 found is 18 May. That doesn't mean that I 7 did not tell him before. In fact I would be 8 very surprised if I didn't tell him before like 9 on the 13th itself or the 14th but I haven't 10 found any evidence of that. 11 Q. If you told him on the 14th you would not 12 have told the Governor on the 15th that Mr 13 McGrail went against the advice of the DPP? 14 A. You can certainly infer that, yes. 15 Q. You said that Mr Pyle was still making 16 the same mistake in the diplomatic telegram 17 that he sent? 18 A. Yes. 19 Q. Just before Mr McGrail retired? 20 A. After, yes. 21 Q. So why did you not tell the governor 22 about your mistake? 23 A. Was I aware of that? 24 Q. Aware of what? 25 A. Of his mistakes?</p> <p style="text-align: center;">Page 139</p>
<p>1 because in his final diplomatic telegram back 2 to the FCDO on 9 June he also says it there. 3 Q. Yes, so it says --- this is Mr Pyle 4 reporting on his meeting with the CM on the 5 15th, "The CM was visibly angry during our 6 meeting on Friday" and then he goes on 7 about various things but he says --- he sets 8 out the issues of concern, "The mishandling 9 of a high profile investigation in which the 10 Commissioner apparently went against the 11 advice of the AG and the DPP." Do you 12 agree again on the 21st there is a reference to 13 your mistake? 14 A. Yes, yes. 15 Q. So by 21 May, nine days later, you have 16 not corrected your mistake? 17 A. No, why do you make that assumption? 18 Q. I am sorry, I was just asking you if you 19 had corrected the mistake, but you did not 20 correct the mistake? 21 A. Of course I did. I told you that I can't --- 22 by 18 May the Chief Minister is no longer 23 using that expression. If Mr Pyle is using it, 24 I don't know because I was not 25 communicating with Mr Pyle but what I am</p> <p style="text-align: center;">Page 138</p>	<p>1 Q. I am just asking if you --- this was ---- 2 A. Is this email ---- 3 Q. You knew that the Governor was about to 4 consider exercising his section 13 powers to 5 force the Commissioner to retire, why did 6 you not tell the Governor that you had made 7 this important mistake about the DPP 8 strongly advising against the search warrant? 9 A. Mr Wagner, if you want me to answer 10 that question, I need to see the documents 11 that you are referring to because it may be 12 that I was not aware that he was reporting 13 that back to the FCDO. 14 Q. No, but just ---- 15 A. That is what I am getting at. You are 16 accusing me of not correcting Mr Pyle when 17 I may not have been aware that Mr Pyle was 18 sending these messages, so if you want to 19 make that point, show me where he is saying 20 it so that I can be sure whether or not I knew 21 he was passing on those messages because I 22 could well have been completely oblivious to 23 the fact that he was sending these messages 24 and that gives the answer to your question. 25 Q. Leaving aside whether you knew he was</p> <p style="text-align: center;">Page 140</p>

<p>1 sending messages to his superiors, Mr Pyle 2 was making decisions about Mr McGrail, 3 was he not, by the beginning of June? 4 A. Of course he was. 5 Q. And you knew by then that you had 6 passed on the wrong information to the Chief 7 Minister on 12 May about the DPP; is that 8 right? 9 A. Yes. 10 Q. And you knew that information had got 11 out to other places because you knew it was 12 in Hassans' letter, did you not? 13 A. Yes, that's correct. 14 Q. And if it was in the Hassans' letter you 15 knew --- you did not tell Hassans, did you? 16 A. No. 17 Q. There was only one other person who 18 knew about that wrong advice, was there 19 not? You did not tell anyone else that the 20 DPP strongly advised against the search 21 warrant? 22 A. That is an email --- it's a WhatsApp 23 exchange between the Chief Minister and 24 myself. 25 Q. Yes, and it was wrong so nobody else</p> <p style="text-align: center;">Page 141</p>	<p>1 MR WAGNER: I have not got much more to 2 do afterwards, probably about 20 minutes or 3 half an hour and I think that fits with the --- I 4 will discuss it with colleagues as well over 5 lunch and make sure that I do not take up 6 their time, thank you. 7 THE CHAIRMAN: Yes, thank you. 8 (13.10) 9 (The short adjournment) 10 (14.00) 11 MICHAEL LLAMAS (Continued) 12 Questioned by MR WAGNER 13 Q. Good afternoon, I want to ask you about 14 the meeting of 13 May and if we can just turn 15 to B228 please, this is something you say in 16 the meeting of 13 May, this is the English 17 translated version and about halfway --- just 18 before halfway down the page you say, "For 19 me it was clear what we agreed in this 20 meeting yesterday, you don't know what 21 went through my body when I saw your 22 WhatsApp yesterday, forget Attorney 23 General, Commissioner of Police, at a 24 personal level Ian McGrail with Michael 25 Llamas," so this is on the 13th, when you</p> <p style="text-align: center;">Page 143</p>
<p>1 knew it. Is that right? So if you two were 2 the only people who knew about it and you 3 did not tell Hassans, it must have been Mr 4 Picardo who told Hassans? 5 A. You need to ask Mr Picardo the question. 6 Q. Yes, but in any event, you knew that that 7 information was out in the wild ---- 8 A. Not in the wild. 9 Q. Why did you not in your information 10 sharing responsibilities which you spoke 11 about quite a lot yesterday in relation to Mr 12 McGrail, why did you not tell the Governor? 13 A. Because I had corrected the position with 14 the person to whom I made the 15 misrepresentation. I had not even known that 16 that had been communicated to Mr Pyle. I 17 have asked you to take me to the 18 correspondence and then if I appear in that 19 correspondence, then I will accept that I new 20 about it and didn't do anything about it. 21 That's all I am asking you for and I can give 22 you a very concrete reply to your question. 23 MR WAGNER: Is now a convenient time to 24 stop? 25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 142</p>	<p>1 were saying, "You don't know what went 2 through my body when I saw your WhatsApp 3 yesterday," did you mean the WhatsApp 4 informing you that Mr Levy was the subject 5 of a search warrant? 6 A. The WhatsApp informing me that a major 7 step had been taken in the investigation 8 contrary --- irrespective of Mr Levy. 9 Q. The WhatsApp that said that Mr Levy 10 was going to be the search warrant? 11 A. Yes, what happened on the 12th. 12 Q. I want to ask you about the Spanish at 13 B164 and it begins [In Spanish]. Can you 14 just translate what that means because I am 15 not sure whether the translation has fully 16 picked it up. 17 A. "You can't imagine." 18 Q. "You can't imagine" what? 19 A. "How I felt when I saw your WhatsApp 20 yesterday." 21 Q. Is it something like a feeling of dread or a 22 shock? 23 A. No, a feeling of betrayal. 24 Q. I am not asking you what your feeling 25 was but is that what the phrase means?</p> <p style="text-align: center;">Page 144</p>

<p>1 A. That's what it meant, the astonishment</p> <p>2 that after what I thought we had agreed in the</p> <p>3 meeting of 7 April this had happened, that is</p> <p>4 what I am saying.</p> <p>5 Q. You have already mentioned in your</p> <p>6 evidence the part of your witness statement at</p> <p>7 A288, 64.8 ----</p> <p>8 A. Sorry, what page number</p> <p>9 Q. A288, paragraph 64.8.</p> <p>10 A. Yes.</p> <p>11 Q. You say, "In expressing myself in</p> <p>12 relation to this part of the discussion I recall</p> <p>13 using over-expressive and emotional</p> <p>14 language which, although it was motivated</p> <p>15 by my concern to protect Gibraltar from</p> <p>16 unnecessary harm, with hindsight I now</p> <p>17 regret." Would you agree that these are two</p> <p>18 instances where you did use very emotional</p> <p>19 language?</p> <p>20 A. I was alone with Mr McGrail at that</p> <p>21 stage, wasn't I?</p> <p>22 Q. I think so, yes.</p> <p>23 A. I would place this --- because I was alone</p> <p>24 with him, firstly, and, secondly, in any event,</p> <p>25 at the lower end of the scale, perhaps about</p> <p style="text-align: center;">Page 145</p>	<p>1 search warrant?</p> <p>2 A. No. Where ----</p> <p>3 Q. That is what you say, "When I heard the -</p> <p>4 -- when I saw your text I felt that the bottom</p> <p>5 had fallen out of my world," or whatever the</p> <p>6 expression is.</p> <p>7 A. It's got nothing to do with Mr Levy, Mr</p> <p>8 Wagner. That expression relates to the</p> <p>9 understanding I thought I had reached with</p> <p>10 Mr McGrail, somebody with whom at that</p> <p>11 stage I had enjoyed a very good working</p> <p>12 relationship. As I have said many times</p> <p>13 already, I thought it was clear what we had</p> <p>14 agreed on the 7th and, I and behold, this</p> <p>15 happens which was completely contrary to</p> <p>16 what I thought we had agreed. The</p> <p>17 disappointment was a personal one. If I can</p> <p>18 have it back on the screen, I don't think it can</p> <p>19 be more obvious, I am telling him that at a</p> <p>20 personal level, Ian McGrail, to Michael</p> <p>21 Llamas, because I thought that is what had</p> <p>22 been broken.</p> <p>23 Q. On a personal level?</p> <p>24 A. Yes.</p> <p>25 Q. On the meeting on 15 May you said in</p> <p style="text-align: center;">Page 147</p>
<p>1 what I had in mind was more the comments</p> <p>2 about their (inaudible) for tears. That is</p> <p>3 really what I was --- what I had in mind.</p> <p>4 Q. When you find out about the serious</p> <p>5 failings in the NSCIS system, and the risk to</p> <p>6 Gibraltar's national security, did you have a</p> <p>7 very emotional reaction then?</p> <p>8 THE CHAIRMAN: Just be clear what you</p> <p>9 are ----</p> <p>10 MR WAGNER: (To the witness): I am not</p> <p>11 asking about the actual specifics of those</p> <p>12 points.</p> <p>13 A. Of course.</p> <p>14 Q. When you realised that the Chief Minister</p> <p>15 should not have angrily criticised the</p> <p>16 Commissioner of Police on 12 May, did you</p> <p>17 become emotional then?</p> <p>18 A. So can you repeat the question?</p> <p>19 Q. When you realised that the Chief Minister</p> <p>20 should not have angrily criticised the</p> <p>21 Commissioner of Police on 12 May did you</p> <p>22 become emotional then?</p> <p>23 A. I don't know.</p> <p>24 Q. But you did become emotional when you</p> <p>25 heard that James Levy was the subject of a</p> <p style="text-align: center;">Page 146</p>	<p>1 your evidence that there was certainly total</p> <p>2 transparency between you and the RGP but</p> <p>3 would you agree that you did not tell the</p> <p>4 RGP that you had spoken to Mr Levy, the</p> <p>5 suspect?</p> <p>6 A. I think that is correct.</p> <p>7 Q. Would you agree that you had not texted</p> <p>8 the suspect, "Don't worry ..." sorry, you had</p> <p>9 not told the RGP that you had texted the</p> <p>10 suspect, "Don't worry"?</p> <p>11 A. I think I did not mention that because that</p> <p>12 conversation which we probably had on the</p> <p>13 12th was where he was expressing his views.</p> <p>14 I barely said anything and I referred him, if</p> <p>15 he wanted to, to the DPP, so it was barely a</p> <p>16 conversation. We spoke, he spoke and I said</p> <p>17 nothing.</p> <p>18 Q. But you did not tell the RGP that?</p> <p>19 A. No, I didn't think it was --- it certainly</p> <p>20 doesn't appear on the transcript, so the</p> <p>21 answer is no, but I didn't think there was any</p> <p>22 need to say that. It wasn't a conversation of</p> <p>23 any substantive nature other than him</p> <p>24 expressing the views we already knew he</p> <p>25 had.</p> <p style="text-align: center;">Page 148</p>

<p>1 Q. If you did meet Mr Baglietto and Mosche 2 Levy on the 14th you didn't tell the RGP 3 about that meeting, did you? 4 A. Yes, which is another reason why I'm 5 pretty sure that I didn't meet Mr Levy and --- 6 Mr Baglietto and Mosche Levy on the 14th. 7 Q. You had already spoken to Mr Baglietto 8 by the 15th, did you tell the RGP that you had 9 spoken to Mr Baglietto? 10 A. Already in the meeting of the 13th we 11 envisaged having communications with Mr 12 Baglietto and it is clear from the meeting of 13 the 15th that I have said it. 14 Q. Would you agree that one of the absolute 15 central things that happened in the meetings 16 between 13 and 20 May was that it was 17 decided that Mr Levy would not be asked to 18 give an interview under caution? 19 A. Yes, that is one of the results of those 20 meetings, a result reached by consensus and 21 discussion between all those who were 22 present in the meeting. In fact I think the 23 idea originates from Mr Richardson. 24 Q. Let us just explore that. If we go to 25 B270, this is the meeting on 15 May --- in</p> <p style="text-align: center;">Page 149</p>	<p>1 conclude without anticipating the outcome is 2 going to be that." Then you say at 817, 3 "Correct, Christian and I are with you 4 entirely on that. What we think would be 5 helpful for the management of the whole 6 thing is if that interview would still go ahead 7 but not have it under caution." Do you agree 8 --- you have just seen the beginning of the 9 meeting and all of the sections from the 10 beginning of the meeting, do you agree that it 11 is you who suggests that the interview would 12 still go ahead but not have it under caution? 13 A. It was a proposal which I must have 14 discussed with the DPP before the meeting. 15 This is the meeting of the 15th, correct? 16 Q. Correct. 17 A. So we must have discussed it and we 18 knew by then that Mr Levy was going to give 19 a "no comment" interview on Monday 18 20 May. 21 Q. You had been told that he was --- 22 A. Yes, and that is the conversation --- 23 Q. You had been told that he was going to 24 give a "no comment" --- 25 A. Yes.</p> <p style="text-align: center;">Page 151</p>
<p>1 fact if we go to B269 above, you can see 2 where the transcript begins. There are a few 3 introductory comments, your first statement 4 is at 535, "Okay, chaps, Christian and I have 5 been spending quite a bit of time together 6 today heading towards a major collision here 7 ..." and you say, "I want to have a completely 8 relaxed discussion between the five of us ..." 9 and there is some discussion about when the 10 previous meeting happened, Mr McGrail 11 says, "It hasn't changed, we continue the 12 unexplained issues which have an impact on 13 the remaining three of the four suspects and 14 if it's a line of enquiry that we can clarify, our 15 main (inaudible) situation for those four 16 individuals were going to be left with that in 17 the air, we don't look at this part of the 18 investigation." You say, "My 19 understanding, Ian, and correct me if I am 20 wrong, is that when --- what you just said is 21 that you have to carry on with the interview; 22 in other words, that's what you are referring 23 to." Mr McGrail says, "It's a line of 24 enquiry." You say, "which is essential to the 25 investigation." Mr McGrail says, "To</p> <p style="text-align: center;">Page 150</p>	<p>1 Q. I will ask you the question again, when 2 you say, "What we think would be helpful 3 for the management of the whole thing is if 4 that interview would still go ahead but not 5 have it under caution," do you agree you 6 make the suggestion first? 7 A. From what I have seen of the transcript, 8 yes, it seems to be the case. 9 Q. So it is not Mr Richardson? 10 A. No. 11 Q. You introduced the idea which is the idea 12 you agree was in the end central to the 13 change in approach to Mr Levy? 14 A. Yes, because of the --- of what was clear 15 was going to happen and then we spent the 16 meeting discussing it and everybody agrees 17 that it's the best way forward. I mean, 18 nobody was being forced to do anything in 19 that meeting. 20 Q. Then B277 at 2613, you say, "What's 21 creating the bad atmosphere? Well, bad is an 22 understatement. What's creating the tension 23 here is the concept of Jamie being suspect 24 and, therefore, being interviewed under 25 caution and we think that if for the sake of</p> <p style="text-align: center;">Page 152</p>

<p>1 the management of this case you can get the 2 interview not treating him that way, there's a 3 possibility of achieving that --- you can 4 achieve your aim of getting the interview 5 with him but that stigma is very oppressive." 6 Do you agree that you were advocating as 7 well as suggesting the idea, you were 8 advocating for Mr Levy to be interviewed not 9 under caution? 10 A. Yes, in the circumstances --- I mean, I 11 had a chat with the DPP half an hour before 12 the meeting. We knew what was coming. 13 We must have discussed options to go 14 forward rather than waiting for the interview, 15 for the "no comment" interview and Christian 16 must have explained to me possibilities to 17 allow the investigation to continue instead of 18 getting the "no comment" interview. 19 Q. You say that the outcome was reached 20 collegiately and by consensus, in the room 21 were the Attorney General, the Director of 22 Public Prosecutions, the Commissioner of 23 Police, the senior investigating officer, and 24 the junior investigating officer, what was the 25 power dynamic in that room?</p> <p style="text-align: center;">Page 153</p>	<p>1 Commissioner of Police, had been angrily 2 criticised by the Chief Minister about the 3 warrant with you in the room. Did you 4 consider whether, knowing as you did at the 5 time or thinking as you did at the time that 6 there was a problem with that, the 7 Commissioner of Police might feel pressured 8 to do what you were telling him he should 9 do? 10 A. Not at all. I could not have given any 11 indication of pressure to Mr McGrail. 12 Q. I did not ask whether you had given any 13 indication of pressure, I was saying that you 14 were in the meeting on the 12th where he was 15 angrily criticised by the Chief Minister, you 16 had not stood up to stop the Chief Minister, 17 had you? 18 A. As I said this morning, it was a very --- a 19 relatively short exchange, it was very fast, 20 they were both talking, there was hardly any 21 time for me to intervene. 22 Q. But you did not do anything afterwards to 23 correct your concern about that meeting? 24 A. As I think I answered that question this 25 morning, I don't recollect.</p> <p style="text-align: center;">Page 155</p>
<p>1 A. I am very balanced. All of these officials 2 have strong views. They express them freely 3 during the meeting. There was no attempt to 4 pressure them or to influence them. We just 5 had the situation, we put it to them and they 6 were free to agree or not to agree. I don't 7 think there's any reason why they should 8 have felt that we were taking them or putting 9 them under pressure. There was a situation 10 and we were exploring ways to maximise the 11 evidence that the RGP could get. The 12 meetings were very collegiate. 13 Q. But would you agree that from the police 14 perspective, if the Attorney General and the 15 Director of Public Prosecutions in a meeting 16 where you say you are advising them, and 17 say, "This is the way we think you should 18 go," it is not easy for the police to say, "Well, 19 actually we want to go a different way." 20 A. I don't agree with that, Mr Wagner. They 21 were perfectly free to do whatever they 22 wanted to do. I think they reached their own 23 conclusion that this was the best way forward 24 for the investigation. 25 Q. Three days earlier, Mr McGrail, the</p> <p style="text-align: center;">Page 154</p>	<p>1 THE CHAIRMAN: He has answered that 2 already. 3 MR WAGNER: (To the witness): You did 4 not go to Mr McGrail and say, "Look, Ian, 5 what happened on the 12th wasn't right," and 6 you were just backing him? 7 A. Mr Wagner, what do you think is the 8 purpose of me asking Mr McGrail to stay 9 alone with me? 10 THE CHAIRMAN: (To the witness): Can 11 you answer the question rather than asking 12 them. 13 A. Sorry, what was the question? 14 MR WAGNER: (To the witness): Did you 15 not at any point say, knowing what you knew 16 or thinking what you thought about the 17 meeting on the 12th, did you not pull Mr 18 McGrail aside and say, "Look, Ian, what 19 happened on the 12th was wrong and I want 20 you to know that I'm backing you"? 21 A. What I told him was what I told him at 22 the end of the meeting on 13 May when I 23 stayed alone with him. 24 Q. So the answer is "no"? 25 A. The answer is that is what I did. I was</p> <p style="text-align: center;">Page 156</p>

<p>1 seeking to help him and to defuse the 2 situation. 3 Q. Can you put up B3731, please --- it might 4 be C, sorry. This is the letter to the GPA that 5 your lawyers wrote but you checked, "Part of 6 the narrative of the CoP's allegations against 7 me is that I apparently gave him the strong 8 impression that I was primarily concerned 9 with protecting the Chief Minister in 10 Gibraltar PLC," the AG's words. "I'm not 11 aware of the Chief Minister in need of 12 protection. Insofar as concerns the fact I was 13 primarily concerned with protecting Gibraltar 14 PLC, which is vernacular for the public 15 interest of Gibraltar ..." just pausing there, is 16 Gibraltar like a public limited company? 17 A. No, it's an expression that many people 18 use in Gibraltar, whether accurately or not, to 19 express the public interest of Gibraltar, the 20 collective interest of Gibraltar. 21 Q. But why would the collective interests of 22 Gibraltar be like a company? 23 A. I don't know. It's just used here, Mr 24 Wagner, in this jurisdiction, rightly or 25 wrongly.</p> <p style="text-align: center;">Page 157</p>	<p>1 in receipt of correspondence relating to a 2 claim for damages following a collision at 3 sea," and he asks whether external counsel 4 can be appointed. Then further on you 5 forward that email an hour and a half later to 6 the Chief Minister with no comment. You 7 said in evidence that you would have 8 expected the Commissioner of Police to be 9 reporting directly because these are very 10 serious office holders with a duty to report 11 between themselves. When you received that 12 email, why did you not forward it saying to 13 the Chief Minister, "This is wrong, I really 14 feel like the Commissioner of Police should 15 have informed you directly"? 16 A. Because, as I said yesterday, I was 17 seeking to assist in the communication 18 without prejudice to the proper lines of 19 communication that must exist. 20 Q. You did not say anything about that, did 21 you? 22 A. This is not the Commissioner, this is Mr 23 Yates but certainly in relation to the 24 Commissioner I thought that that line of 25 communication ought to be obvious to him.</p> <p style="text-align: center;">Page 159</p>
<p>1 Q. Is Hassans part of Gibraltar PLC? 2 A. Everybody in Gibraltar is part of 3 Gibraltar PLC. 4 Q. Do you recall that on 13 May Mr 5 McGrail informed you that he was going to 6 approach the Governor about his concerns 7 relating to Operation Delhi? 8 A. I don't recall that. This is when he's 9 pointing out of the window, yes? 10 Q. No, no, a separate --- not in that meeting, 11 just separately. 12 A. I don't recall that. 13 Q. Do you recall telling Mr McGrail not to 14 do anything? 15 A. I don't recall that. I remember telling him 16 not to do anything in relation to the more 17 serious allegations in the Hassans letters 18 which is what we were going to deal with 19 between the DPP and myself. 20 Q. Did you tell him not to approach the 21 Governor about those allegations? 22 A. I don't recall that. 23 Q. At C4106, please, this is the 20 May, the 24 letter that Cathal Yates sent to you, the email, 25 sorry, about "The Commissioner of Police is</p> <p style="text-align: center;">Page 158</p>	<p>1 Q. If you look above that, the Chief Minister 2 says, "I think it's entirely inappropriate for 3 this matter not to have been raised with me in 4 the first instance by the Commissioner. This 5 matter raises issues of fundamental human 6 rights, the right to life, potential payment of 7 huge amounts of damages," et cetera, et 8 cetera, do you agree that that was a total 9 overreaction by the Chief Minister? 10 A. You need to ask him. I don't know what 11 was in his mind. 12 Q. No, but you know that on 20 May he was 13 deep into the process involving the GPA and 14 possibly looking for more reasons to include 15 in his justifications. Is that right 16 chronologically? 17 A. As I said this morning, I was not fully 18 aware of what --- I knew things were 19 happening but I was not in that detail and 20 then chronologically it must fit in with that. 21 That is certainly the case. 22 Q. If we can go to A1301, please, at 23 paragraph 16 --- sorry, 19, this is Mr 24 Devincenzi's evidence about the meeting of 25 13 May, he says, "Shortly after that meeting I</p> <p style="text-align: center;">Page 160</p>

40 (Pages 157 to 160)

<p>1 recall the Attorney General raising briefly 2 with me the applicable legal test or threshold 3 for a nolle prosequi. The conversation was 4 of an academic nature and to the best of my 5 recollection it was against the background of 6 protecting the jurisdiction and office of the 7 Chief Minister." I think you said that you 8 remembered that conversation? 9 A. I'm not sure that I said that because I 10 genuinely do not --- I may have a very vague 11 recollection but this is after the meeting of 13 12 May, is it not? 13 Q. Yes. Do you agree that on 13 May you 14 were at least thinking about the possibility of 15 entering a nolle? 16 A. No, not at all. On 13 May Mr McGrail 17 had offered the nolle three times. 18 Q. I do not think it is in Mr McGrail's gift to 19 offer a nolle, is it? 20 A. Well, that's what he was doing in the 21 meeting, the magic wands. 22 Q. Hold on; he was saying that you had the 23 magic wand not that he had the magic wand? 24 A. But he was inviting me to use it. 25 Q. Let me put this to you and see if you</p> <p style="text-align: center;">Page 161</p>	<p>1 it is which also includes the nolle in the sort 2 of general --- in that section. Did you 3 consider using the nolle then? 4 A. Not at all, no. 5 Q. Is it not right that in each of the moments 6 around that time you toyed with the idea of 7 the nolle --- 8 A. Not at all. 9 Q. --- but backed off? 10 A. Not at all. 11 Q. Is it not right that instead of using the 12 nolle, you were making attempts to limit the 13 impact of the prosecution and the 14 investigation in other ways? 15 A. Not at all. I was helping the investigation 16 to proceed in light of the circumstances that 17 existed and in a collegiate manner with Mr 18 McGrail and Mr Richardson. 19 Q. I have just two more short matters and 20 then I am done. The incident at sea, I want to 21 ask you about information sharing and what 22 you said yesterday. You were asked why 23 you did not raise any of the concerns you say 24 you had about Mr McGrail's information 25 sharing at the time and you said that you did</p> <p style="text-align: center;">Page 163</p>
<p>1 agree, he was not inviting --- he was not 2 offering a nolle, he was saying, "You can 3 either --- I can't enter the nolle," as in, "I can't 4 stop this, only can." 5 A. No, he was saying that he, the Royal 6 Gibraltar Police, would not stop this 7 investigation. 8 Q. Yes, that is correct. 9 A. Right, but that the DPP could or I could 10 and "if you can, why don't you, Michael? I 11 wouldn't have any objections if you did so." 12 Q. Did you wonder why he might be 13 suggesting that? 14 A. No, both the DPP and I were startled by 15 the comments. 16 Q. Might it have been because he had just 17 been given what he described as the dressing 18 down of his entire career the day before? 19 A. That didn't justify the comment to the 20 DPP and myself. 21 THE CHAIRMAN: It is almost half past. 22 MR WAGNER: Yes, I am very nearly done. 23 (To the witness): On 17 May you have been 24 shown that the Chief Minister texted you 25 about the powers under section 59(2) I think</p> <p style="text-align: center;">Page 162</p>	<p>1 not want to interfere with the way Mr 2 McGrail reported to the Governor. Is the 3 reality that you did not have any of those 4 concerns at the time? 5 A. No. 6 Q. And in reality if you had had those 7 concerns you would have told someone about 8 them? 9 A. No, I thought it was a matter for the 10 Commissioner of Police to decide how we 11 should report to the Governor. 12 Q. You are the legal advisor to the 13 Governor, is it not for you to advise the 14 Governor on these things? 15 A. He is the Commissioner of Police with a 16 statutory and constitutional relationship and 17 obligations towards his Excellency the 18 Governor. 19 Q. But there is no evidence that you have 20 produced of any of those concerns being put 21 in writing? 22 A. Sorry? 23 Q. You have produced no evidence to this 24 Inquiry of any of those concerns being put in 25 writing?</p> <p style="text-align: center;">Page 164</p>

<p>1 A. No, no. 2 Q. Finally, I want to ask you about the 3 airport incident. You talked at length this 4 morning about the concerns you had about 5 Mr McGrail's handling of the airport 6 incident, and you agreed that there is no 7 written record of those concerns, is there? 8 A. Yes. 9 Q. And you have not expressed those 10 concerns in your written evidence to this 11 Inquiry? 12 A. No. 13 Q. There is in fact a written record of 14 concerns expressed in relation to the airport 15 incident and in fact I think it is the only 16 written record before this Inquiry apart from 17 Mr Pyle and Mr Picardo's statements from 18 the time of concerns expressed by you or the 19 Chief Minister or Mr Pyle and it is at C207. 20 This is an email from Mr Picardo dated 3 21 March 2017, Mr Picardo says, "My 22 impression and clear understanding is that 23 the MOD have now fully understood the 24 position and the nonsense and bravado being 25 displayed by fools such as those you refer to</p> <p style="text-align: center;">Page 165</p>	<p>1 Q. Did you send an email back saying, 2 "Actually I have separate concerns of a 3 different nature? 4 A. I did not reply by email but those are the 5 Chief Minister's views, they are not 6 necessarily my views. I may have spoken to 7 him about the incident but I think what the 8 Chief Minister is referring to is the 9 jurisdictional dispute that we had with the 10 MOD rather than the so-called Operation 11 Apache. 12 Q. You did not reply to everybody saying, "I 13 don't agree, I think the real menace here is 14 Ian McGrail"? 15 A. Maybe I mentioned it to him. I am not 16 comfortable with that language and I wasn't 17 then. 18 Q. You say you are not comfortable with 19 that language but did you no also refer to the 20 RGP as "clowns"? 21 A. Listen, Mr Wagner, I apologise for that 22 statement. As I said this morning, I think Mr 23 Devincenzi has really taken it out of context. 24 We here in Gibraltar often use expressions 25 like that. I can use it in relation to a lot of</p> <p style="text-align: center;">Page 167</p>
<p>1 below in fact illustrates why and how we find 2 ourselves in this unnecessary and unpleasant 3 situation. If it requires another turn of the 4 screw, I will not hesitate to support you in. It 5 will once again have been brought about by 6 those who fail to recognise the need to show 7 proper and genuine contrition and respect for 8 the RGP and for our constitution." Then 9 further down, "Failing to respect our 10 constitution is not to fail to respect just 11 Gibraltar, it's to fail to respect the UK 12 Parliament and the same Monarch that these 13 clowns in uniform have sworn an oath to." 14 Then the final paragraph is, "I can also tell 15 you that Gibraltar will not be home to the 16 people in question for long, we won't be 17 blocking the tarmac for a moment to delay 18 the plane when the time soon comes for them 19 to wave goodbye to the best place these 20 idiots have ever had the good fortune to live 21 in their petty lives. Good riddance and 22 goodbye won't come soon enough." Can we 23 go to the top, you were cc'd into this email, 24 were you not? 25 A. I was.</p> <p style="text-align: center;">Page 166</p>	<p>1 people and it's just a manner of speaking 2 here. Again, seen in the cold light of this 3 Inquiry, like the "don't worry," it looks worse 4 than what it is. I am really surprised, to be 5 honest, that Mr Devincenzi has given it that 6 prominence in his evidence because it's 7 completely out of context. 8 MR WAGNER: I am just going to turn my 9 back for a moment if I may. Thank you. 10 THE CHAIRMAN: 11 MR GIBBS: Sir, Mr Wagner, has covered 12 almost all the questions that I would want to 13 ask of Mr Llamas but if I could just ask for 14 his help on ---- 15 THE CHAIRMAN: Details? 16 MR GIBBS: Quite, of a couple of meetings, 17 just two of the meetings. 18 Questioned by MR GIBBS: 19 Q. The two meetings I am interested in are 7 20 April 2020 and 13 May 2020. The 7 April 21 2020 meeting is the meeting in which you 22 say that you gave clear advice that nothing 23 more was to happen without your say so and 24 that it was clear beyond peradventure. Those 25 are your words. Can you explain why</p> <p style="text-align: center;">Page 168</p>

<p>1 nobody else heard that advice?</p> <p>2 A. Well, it is certainly a question I have</p> <p>3 asked myself ----</p> <p>4 Q. No, but it is the question I am asking you</p> <p>5 now.</p> <p>6 Q. Because maybe it was too soft. I just</p> <p>7 thought it would be understood at least</p> <p>8 between Mr McGrail and myself.</p> <p>9 Q. Because you have heard the evidence, it</p> <p>10 certainly was not clear to Mr Richardson and</p> <p>11 it does not seem to have been clear to Mr</p> <p>12 Devincenzi. Are you surprised by that?</p> <p>13 A. It made me think.</p> <p>14 Q. Are you surprised by that?</p> <p>15 A. A bit.</p> <p>16 Q. You have told us that you were not giving</p> <p>17 the advice as Attorney General. Is that right?</p> <p>18 A. I was not giving legal advice as Mr</p> <p>19 Richardson has recognised himself.</p> <p>20 Q. In what capacity had you called the</p> <p>21 meeting?</p> <p>22 A. In the capacity of a person who has the</p> <p>23 role that I have and has a panoramic view of</p> <p>24 the public interest of Gibraltar which a</p> <p>25 Commissioner of Police, Mr McGrail, or any</p> <p style="text-align: center;">Page 169</p>	<p>1 THE CHAIRMAN: It was made six weeks</p> <p>2 later?</p> <p>3 MR GIBBS: Correct, thank you. 4 May</p> <p>4 2020. It refers, we think, to the meeting of 7</p> <p>5 April 2020, and if we can have it all on</p> <p>6 screen so that you can --</p> <p>7 THE CHAIRMAN: Indeed, the fact that it</p> <p>8 was made six weeks later probably explains</p> <p>9 the wrong date on it.</p> <p>10 MR GIBBS: Yes, quite, with respect. Do</p> <p>11 you remember Mr Richardson, in response to</p> <p>12 the suggestion that Mr Sanchez be dealt with</p> <p>13 by way of disciplinary process, saying</p> <p>14 forcefully, "But how can we do that, the man</p> <p>15 is corrupt?"</p> <p>16 A. I don't remember that.</p> <p>17 Q. And then apologising for having spoken</p> <p>18 so frankly?</p> <p>19 A. I don't remember that. I remember the</p> <p>20 discussion on Mr Sanchez, that I do, but not</p> <p>21 Mr Richardson's reaction.</p> <p>22 Q. And then you saying, "Don't apologise,</p> <p>23 frankness is welcome"?</p> <p>24 A. Where is that sent?</p> <p>25 Q. I am asking whether you remember that?</p> <p style="text-align: center;">Page 171</p>
<p>1 other would not have.</p> <p>2 Q. Can I make it easier? Had you called the</p> <p>3 meeting in the capacity of Attorney General?</p> <p>4 A. Yes, even though you could take it that</p> <p>5 way even if not to give legal advice.</p> <p>6 Q. What some others do remember, as you</p> <p>7 will know from the evidence, is mention</p> <p>8 made of whether Mr Sanchez could be dealt</p> <p>9 with by disciplinary process?</p> <p>10 A. Yes.</p> <p>11 Q. Do you remember that?</p> <p>12 A. I know they have said that.</p> <p>13 Q. And who brought up that idea?</p> <p>14 A. I did.</p> <p>15 Q. You do not have a note of that meeting,</p> <p>16 do you?</p> <p>17 A. No.</p> <p>18 (14.46)</p> <p>19 Q. We do have a note, it is at D3938, please.</p> <p>20 It bears the wrong date. I am looking at the</p> <p>21 entry --</p> <p>22 THE CHAIRMAN: This is not a</p> <p>23 contemporaneous note?</p> <p>24 MR GIBBS: No. It was not a</p> <p>25 contemporaneous note.</p> <p style="text-align: center;">Page 170</p>	<p>1 THE CHAIRMAN: It is the last line of the</p> <p>2 note.</p> <p>3 A. Yes. No, I mean, I don't remember the</p> <p>4 detail of the conversation, so I won't</p> <p>5 remember that part either. I just remember</p> <p>6 that I raised the question of Caine Sanchez,</p> <p>7 and as I have already explained, I just wanted</p> <p>8 to know how the parallel procedures of the</p> <p>9 disciplinary procedures and the criminal</p> <p>10 investigation, were they going to work</p> <p>11 together or not.</p> <p>12 MR GIBBS: Did you make a note, though,</p> <p>13 of a couple of things during that meeting?</p> <p>14 Did you write things down during that</p> <p>15 meeting on the back of a typed document?</p> <p>16 A. I don't recall doing that.</p> <p>17 Q. One of them being the large number of</p> <p>18 draft charges from which a selection needed</p> <p>19 to be made?</p> <p>20 A. I don't remember writing it down, but I</p> <p>21 would have - that if I did write anything</p> <p>22 down that would have been one of the things,</p> <p>23 because we were discussing that in that</p> <p>24 meeting.</p> <p>25 Q. And the other being Mr Levy's precise</p> <p style="text-align: center;">Page 172</p>

<p>1 shareholding in 36 North? 2 A. I don't remember that. 3 Q. Why would that have been significant to 4 you? 5 A. I don't remember having written that. 6 Q. "10.56 per cent, ultimate beneficial 7 ownership in 36 North." 8 A. If I did write it, it's because it struck me 9 as something that is relevant. 10 Q. Struck you as what? 11 A. As being a relevant matter. 12 Q. Relevant in what respect? 13 A. I was just - Mr Gibbs, in that meeting I 14 had had the full - first full briefing the 15 previous day by Mr Rocca, and this was my 16 first full meeting with the RGP, and I was 17 taking notes of what they were telling me. I 18 was trying - I was learning what the case 19 about, and I don't know what I drafted, and 20 what I put down in a note, but that if I did do 21 so, it's because it struck me as a feature of the 22 case. Mr Rocca had already informed me the 23 previous day of the 36 North connection and 24 Mr Levy. 25 Q. Two things, is this right, that definitely</p> <p style="text-align: center;">Page 173</p>	<p>1 A. No. 2 Q. You would not have had much to say 3 about it? 4 A. On what date? Before -- 5 Q. On any day before 12 May. 6 A. No, no, because -- 7 Q. You would have said, "Go right ahead. 8 Interview Mr Levy under caution, of course 9 if that is what you need to do. Search - apply 10 for a warrant, search his telephones, of 11 course." 12 A. No, no, because that would have been 13 inconsistent with the agreement, I thought I 14 had reached with Mr McGrail on 7 April. 15 Q. On 12 May when you received, did you, a 16 text saying that such a warrant - that the RGP 17 had attended upon Mr Levy with such 18 warrants, the Chief Minister got a similar 19 message at the same time? 20 A. More or less. 21 Q. Were you together? 22 A. I can't remember. 23 Q. Well, have a go. 24 A. I have, even before coming here, and I 25 can't remember. I've got my office very</p> <p style="text-align: center;">Page 175</p>
<p>1 were not mentioned at that meeting were, the 2 RGP's plan to interview Mr Levy under 3 caution, and the RGP's plan to apply for 4 warrants to search his telephones? 5 A. I think that is correct, yes. 6 Q. Not least because it was not until the next 7 day that the DPP as we now know gave 8 approval for the treatment of Mr Levy as a 9 suspect, and in any event, have you heard the 10 evidence to the effect that Mr Rocca was 11 asked not to share that information more 12 widely? 13 A. No. I wasn't aware of it. 14 Q. Well, did he tell you at any time before 15 12 May that it was the RGP's intention to 16 interview Mr Levy under caution? 17 A. I don't recall that, Mr Gibbs. 18 Q. And that it was the RGP's intention to 19 apply for warrants to search his telephones? 20 A. I don't recall that, either. 21 Q. And if he had, can you say whether you 22 would have had something to say about that? 23 A. Not particularly, no. 24 Q. You would not have had much to say 25 about it?</p> <p style="text-align: center;">Page 174</p>	<p>1 nearby his, not in the same building, but next 2 door. 3 Q. And do you remember Mr Picardo's 4 immediate reaction being, "Given my close 5 relationship with JL, I won't comment 6 further"? 7 A. That's his text message? 8 Q. Yes. Do you remember that? 9 A. I don't remember him writing it. I mean, 10 I remember the message, yes, if that's the 11 question. 12 Q. And did he tell you that he had sent that 13 message? 14 A. I don't remember. I don't think so. 15 Q. In your view, was that the only right way 16 for him to react? 17 A. Perhaps. He certainly didn't feel it that 18 way. 19 Q. I mean, without rehearsing what everyone 20 has already asked you about, the share 21 ownership, the friendship, the Hassans co- 22 partnership -- 23 A. Yes. 24 Q. -- all of the reasons why -- 25 A. Yes.</p> <p style="text-align: center;">Page 176</p>

<p>1 Q. -- he could not comment further. Do you 2 now agree that he simply could not? 3 A. Yes, I suppose so. 4 Q. In the words of another, do you agree he, 5 because of all of his connections and his 6 positions had to stay 100 miles away from 7 this? 8 A. That's a matter for him. 9 Q. Yes, but do you agree that that - it being a 10 matter for him, that was what he had to do? 11 A. Perhaps. I'm not in his mind. 12 THE CHAIRMAN: You have said on a 13 number of occasions that the boundaries or 14 the lines, or even the red lines are for the 15 Chief Minister to draw. Did it not strike you 16 as part of your duty as Attorney General to 17 assist him to draw those lines? 18 A. My involvement with him was largely on 19 that day, in this investigation, on the 12th. 20 That I did nothing - I didn't think I could act 21 on the spot on the 12th, because it was all 22 happening very quickly. Whether I failed 23 thereafter to do the things, and say the things 24 that you're suggesting, yes, it's something 25 which I accept. Does that answer the</p> <p style="text-align: center;">Page 177</p>	<p>1 him. I just don't remember. 2 Q. Well, you could not, could you, given his 3 different hats that he found himself wearing 4 here, you could not as Attorney General 5 advise both him and the government, could 6 you? 7 A. What, him personally? 8 Q. Yes. 9 A. No. 10 Q. Did you say, "Look Fabian, you are going 11 to need some independent advice here. I 12 can't advise you on this, and the government. 13 It is one or the other", because you are 14 personally involved? 15 A. I did not make that suggestion to him. 16 Q. And even if it were not for the substance 17 of the thing, if one just stepped back and 18 looked back at the appearance of it, I mean, 19 for appearances that was what you had to 20 say, was it not? 21 A. As I said, I don't exclude I may have said 22 it. I just do not remember. 23 Q. I am now going to take you, again, to the 24 messages we looked at about section 59(2)(b) 25 and your responses. The reference is B1418,</p> <p style="text-align: center;">Page 179</p>
<p>1 question? 2 THE CHAIRMAN: Well, I have asked the 3 question, you have answered it. 4 MR GIBBS: Quite apart from the fact that 5 you both held high offices of state, I mean, 6 even friend to friend or Queen's Counsel to 7 Queen's Counsel, should you not have told 8 him that? 9 A. Yes, I should have, and maybe even I did 10 it, and I just don't remember, but I accept it's 11 not recorded in any formal way. There are 12 phases - there have been phases in the last 13 year - when we've spent a lot of time 14 together, we've been travelling to London, 15 and to Madrid, and to Brussels together. We 16 could be having chats. Maybe I've 17 mentioned something. I don't remember 18 having done it. That is the best answer that I 19 can give you, Mr Gibbs, and I really - I can't 20 point down a discussion somewhere talking 21 about it. 22 Q. So, you should have known it, and he 23 should have known it, and if he did not know 24 it, you should have told him it. 25 A. And I don't exclude that I may have told</p> <p style="text-align: center;">Page 178</p>	<p>1 but do you accept that in the cold light of 2 day, now, that conversation is wholly 3 improper? 4 A. Which conversation on the -- 5 Q. The conversation between you and Mr 6 Picardo, section 59(2)(b) where you were 7 exploring, having a conversation, in effect, 8 about your power to discontinue? 9 A. I don't consider that to have been a 10 conversation. 11 Q. Well, that will fall to another to construe. 12 Can I then turn to 13 May, so, the first of the 13 recorded meetings. Was something odd 14 happening at that meeting? 15 A. What was odd is that it came after 12 16 May. 17 Q. No, I mean in the meeting. Was 18 something odd happening? 19 A. I do not have any recollection of anything 20 odd happening. 21 Q. It is a meeting between, on the one hand, 22 the law officers and on the other the senior 23 police officers involved in a criminal 24 investigation. Was anything odd happening? 25 A. The mere fact that a meeting between</p> <p style="text-align: center;">Page 180</p>

<p>1 those persons was taking place is not normal,</p> <p>2 yes.</p> <p>3 Q. Mr Richardson described sensing that</p> <p>4 something was seriously wrong with what</p> <p>5 was happening.</p> <p>6 A. No. Well, that's Mr Richardson's</p> <p>7 impression, it wasn't mine. The way I saw</p> <p>8 that meeting and how it was convened is that</p> <p>9 there'd been the moment of 12 May, the day</p> <p>10 before, and the very strong letter which had</p> <p>11 been sent by Hassans the previous day. So,</p> <p>12 there was a tension around - created by that.</p> <p>13 I think the tension subsided during the</p> <p>14 meeting, but it certainly started a bit tense.</p> <p>15 Q. Mr Wyan has described feeling,</p> <p>16 "influence at work in the room". He said</p> <p>17 that they arrived knowing what they needed</p> <p>18 to do, but they left with a highly unusual</p> <p>19 course of action.</p> <p>20 A. As far as I'm concerned there was - is this</p> <p>21 the meeting of the 13th?</p> <p>22 Q. 13th.</p> <p>23 A. As far as I'm concerned that meeting was</p> <p>24 largely about the reaction to the Hassans'</p> <p>25 letter, and I don't even know whether - I can't</p> <p style="text-align: center;">Page 181</p>	<p>1 Q. -- did you think, "I wonder why he is</p> <p>2 sending me that?"</p> <p>3 A. Well, because I know Mr DeVincenzi</p> <p>4 very well and he had - he was a close</p> <p>5 working colleague and a friend, and I</p> <p>6 suppose he said, "Look, this is a volatile</p> <p>7 situation, and I'm going to help Michael,</p> <p>8 giving him indications, like for the Trudeau</p> <p>9 Report in case - I mean, it's completely</p> <p>10 unsolicited, his email to me - in case it may</p> <p>11 help him." I mean, that was his view.</p> <p>12 Q. And when he brought up the Shawcross</p> <p>13 principle --</p> <p>14 A. The doctrine, yes.</p> <p>15 Q. -- about the need for the Attorney to be</p> <p>16 independent of politician influence when</p> <p>17 making prosecutorial decisions, did you</p> <p>18 think, "Why is he sending me that?"</p> <p>19 A. No, I mean, I was already very familiar</p> <p>20 with the Shawcross doctrine, and I didn't</p> <p>21 consider - I mean Lloyd is somebody who</p> <p>22 worries very much, I think, as a person and</p> <p>23 he was sending these things to me, but I did</p> <p>24 not think I was doing anything that called</p> <p>25 into question any of those issues.</p> <p style="text-align: center;">Page 183</p>
<p>1 remember, and take me to it, please, if it did -</p> <p>2 whether we were talking of alternative ways</p> <p>3 of dealing of Mr Levy already at that stage.</p> <p>4 Q. And Mr DeVincenzi describes a sense of</p> <p>5 disquiet about the whole file from the</p> <p>6 beginning. He said, "I wasn't sure that the</p> <p>7 Attorney General was drawing a line around</p> <p>8 his own role." Did you pick up on that</p> <p>9 disquiet?</p> <p>10 A. No, no, I don't - I mean, that is Mr</p> <p>11 DeVincenzi's views, not necessarily mine.</p> <p>12 Q. Well, there we have got Mr Richardson</p> <p>13 and Mr Wyan, and Mr DeVincenzi.</p> <p>14 A. I don't think Mr DeVincenzi - is he</p> <p>15 referring to this specific meeting?</p> <p>16 Q. His disquiet began before that, did it not?</p> <p>17 A. Well, that is what I thought listening to</p> <p>18 him yesterday.</p> <p>19 Q. And after that meeting on the 13th, when</p> <p>20 Mr DeVincenzi sent you the Trudeau Report</p> <p>21 --</p> <p>22 A. Yes.</p> <p>23 Q. -- which is about a Chief Minister trying</p> <p>24 to pressure an Attorney General --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 182</p>	<p>1 Q. So, you were familiar with the principle.</p> <p>2 Why did you think that he felt the need to</p> <p>3 remind you of it?</p> <p>4 A. Because that's the way he is, and he - I</p> <p>5 mean, he explained his position yesterday. I</p> <p>6 can't really add to what he said yesterday. It</p> <p>7 was his view, which I may have shared or not</p> <p>8 shared, and that's why he sent it. I mean, I</p> <p>9 was conscious of what I was doing.</p> <p>10 Q. Did it occur to you, Mr Llamas, that he</p> <p>11 might be trying to show you the straight</p> <p>12 path?</p> <p>13 A. I thought - I never thought I was not on</p> <p>14 the straight path.</p> <p>15 Q. In those meetings with the police, did it</p> <p>16 occur to you at any time to say to the police</p> <p>17 as the Attorney General, "Stand by your plan.</p> <p>18 You've seen the evidence, I haven't. You</p> <p>19 must exercise independent judgment. We</p> <p>20 will support you, and together we'll find a</p> <p>21 way to follow the evidence wherever it</p> <p>22 leads"?</p> <p>23 A. I think it was obvious to the police that</p> <p>24 that was a path they could follow whenever</p> <p>25 they wanted. Mr McGrail is coming to</p> <p style="text-align: center;">Page 184</p>

<p>1 receive legal advice, rightly, because of the 2 nature of the letters of Hassans. We are 3 certainly giving them all the advice they 4 needed to reply to the serious allegations in 5 the letters, and then we were helping them 6 proceed with investigation keeping all 7 options open, keeping Mr Levy's status as a 8 suspect open, but taking account of the 9 reality that they would not get anything in an 10 interview on Monday 18th other than a, "no 11 comment" interview, and that is the 12 collegiate way, that is the situation which we 13 all together worked on, leading to Mr 14 Richardson proposal of the voluntary 15 statement. 16 Q. Leave on one side what Mr Baglietto had 17 told you Mr Levy would do if he was 18 interviewed. The police had his telephone, 19 did they not? 20 A. Yes. 21 Q. Did you say to the police or consider 22 saying to the police, "Well, that could be - I 23 accept from your investigation" of however 24 many months and years it is, "that could be a 25 really important source of evidence. We</p> <p style="text-align: center;">Page 185</p>	<p>1 thought that the evidential part of the test was 2 met. 3 Q. I mean was it -- 4 A. It's not for me, Mr Gibbs, to question Mr 5 Rocca's assessment of the evidence. 6 Q. Was it quicker and quieter and neater if 7 the RGP would simply back down -- 8 A. Not at all. 9 Q. -- in the face of the lawyerly assault from 10 Hassans? 11 A. Not at all and what you're suggesting is 12 just not borne out by the transcripts of the 13 meetings. 14 Q. And persuasion or suggestion by you that 15 they abandon their original proposals? 16 A. Not at all. 17 Q. With you saying throughout that you 18 would protect them from the Hassans 19 assault? 20 A. That is what both the DPP and I were 21 doing. I mean, there were various limbs to 22 these meetings, and that was one of them. 23 Q. I know this has been asked before - 24 forgive me repeating the question: why did 25 you not tell the police that you were in</p> <p style="text-align: center;">Page 187</p>
<p>1 must find a way if we can, legally and 2 properly, to examine that telephone." 3 A. Those telephones stayed with the police 4 all the time. 5 Q. Correct. Did it occur to you to say to the 6 police, "We must together find a way, if we 7 can, examine those telephones."? 8 A. No, no, it didn't. 9 Q. It never occurred to you? 10 A. No, it didn't occur to me. 11 Q. You had a way, you had a power to stop 12 the investigation or to stop a prosecution, did 13 you not? 14 A. Yes. 15 Q. By discontinuing? 16 A. Yes. 17 Q. And the Director had a way to stop the 18 prosecution - well, stop the investigation 19 turning into a prosecution if it failed the 20 public interest limb of the prosecution test. 21 A. Absolutely, the evidence, yes. 22 Q. Did you prefer though for it to happen a 23 different way? 24 A. Not at all, I didn't have any view on that. 25 The DPP was always very clear to me that he</p> <p style="text-align: center;">Page 186</p>	<p>1 contact with Hassans? 2 A. When? 3 Q. On 13 May. 4 A. Because I was in contact with Hassans 5 after the meetings. If you looked at - I 6 received two missed calls from Mr Baglietto 7 early evening, so I must have spoken to him 8 after the meeting. 9 Q. And had you spoken to Mr Levy? 10 A. On the 12th, in this one-way, short 11 conversation in which I just listened to how 12 aggrieved he was. He was courteous, is what 13 I remember, he was polite, but he said that he 14 couldn't understand what had happened. I 15 barely said anything other than - I think I 16 suggested to him that if he wanted to speak 17 that he should speak to the DPP, and I think 18 he told me that he would do so, which is why 19 in my witness statement I said, and I believe 20 they did, which the DPP has now confirmed 21 did not happen. 22 Q. Did you mention to the police that you 23 had spoken to Mr Levy? 24 A. No, because it was such a short 25 conversation. Well, it was barely a</p> <p style="text-align: center;">Page 188</p>

47 (Pages 185 to 188)

<p>1 conversation.</p> <p>2 Q. The turning up at your office of Mr</p> <p>3 Baglietto and Mr Levy's son - unannounced?</p> <p>4 A. No, that must - when we spoke on the</p> <p>5 13th we must have agreed. I must have</p> <p>6 agreed with Mr Baglietto to come around. I</p> <p>7 don't think he would just turn up.</p> <p>8 (15.00)</p> <p>9 Q. So, by appointment?</p> <p>10 A. If you want to call it that, yes.</p> <p>11 Q. No, you must decide what to call it.</p> <p>12 A. I don't remember the conversation, Mr</p> <p>13 Gibbs, but I am assuming that I must have</p> <p>14 said, "Pop by tomorrow".</p> <p>15 Q. And Mr DeVincenzi, by sending you the</p> <p>16 WhatsApps about that, has ensured that there</p> <p>17 is a record of their attendance?</p> <p>18 A. As I have disclosed to the inquiry. What</p> <p>19 those messages do not prove is that the</p> <p>20 meeting took place, a meeting which I do not</p> <p>21 recollect happening. I find it very odd that</p> <p>22 Mr DeVincenzi sends me a WhatsApp to say</p> <p>23 that Mr Baglietto, Mr Levy were there. The</p> <p>24 place where I think he says he sent those</p> <p>25 messages to my office is barely 10 metres. It</p> <p style="text-align: center;">Page 189</p>	<p>1 Q. But if you can remember it now, does the</p> <p>2 message say, "I'll pick you up later", or does</p> <p>3 it say, "I'm on my way. My last meeting</p> <p>4 didn't turn up", or "I sent them away"?</p> <p>5 A. The message from memory says, "Are</p> <p>6 you ready? On my way. Two messages, in</p> <p>7 other words.</p> <p>8 Q. We do not need now to look at the</p> <p>9 number of times that you refer to Mr Levy's</p> <p>10 telephones in the meetings because they are</p> <p>11 on the face of the transcripts, but the</p> <p>12 telephone was a concern to you.</p> <p>13 A. It was a concern to everyone. That was</p> <p>14 the big issue at the time, the phones.</p> <p>15 Q. What messages did you think there might</p> <p>16 be on the telephones between Mr Levy and</p> <p>17 the Chief Minister?</p> <p>18 A. I didn't think about that. I thought about</p> <p>19 the messages that somebody who was the</p> <p>20 head of the biggest law firm in Gibraltar, a</p> <p>21 very important businessman in Gibraltar and</p> <p>22 the head of the Jewish community in</p> <p>23 Gibraltar, I thought that there could be a lot</p> <p>24 of messages there which were of a very</p> <p>25 private or confidential nature and I could</p> <p style="text-align: center;">Page 191</p>
<p>1 would have been easier for him, quicker for</p> <p>2 him, to come and knock on my door than to</p> <p>3 write a WhatsApp message. It leads me to</p> <p>4 believe that I probably was not in the</p> <p>5 building.</p> <p>6 Q. Forgotten that they were coming?</p> <p>7 A. I don't know, Mr Gibbs, is the honest</p> <p>8 answer but I would not have forgotten. I may</p> <p>9 have been held back in another meeting or I</p> <p>10 may have told my PA to call his PA to cancel</p> <p>11 the meeting. I am not going to tell you it was</p> <p>12 one thing or the other because I genuinely do</p> <p>13 not remember. What I certainly don't</p> <p>14 remember is meeting them and the evidence</p> <p>15 of my WhatsApps exchanges with my son,</p> <p>16 Pierre, will show is that I was on the way to</p> <p>17 see him eight minutes after the second</p> <p>18 message from Mr DeVincenzi. So, that is at</p> <p>19 best an eight-minute meeting and highly</p> <p>20 unlikely to be even that, because obviously I</p> <p>21 had still not turned up at 12.45.</p> <p>22 Q. Well, obviously the Chairman will see</p> <p>23 what your message is when you show it to</p> <p>24 him.</p> <p>25 A. Absolutely.</p> <p style="text-align: center;">Page 190</p>	<p>1 understand his nervousness about not having</p> <p>2 his phones. I did not think about what</p> <p>3 messages there may have been between him</p> <p>4 and the Chief Minister. It wasn't a matter</p> <p>5 that crossed my mind. It was those three</p> <p>6 matters that did.</p> <p>7 Q. Could we have B180, please, the second</p> <p>8 half of the page. Let me ask one question, if</p> <p>9 I may. Do you see it?</p> <p>10 A. (no reply)</p> <p>11 Q. One of the areas you wanted to interview</p> <p>12 Haime on is communications with the Chief</p> <p>13 Minister. Who brought that up?</p> <p>14 A. If it's not preceded by any reference to</p> <p>15 that, then if this is where it appears for the</p> <p>16 first time, it's there.</p> <p>17 Q. The amendment that you asked to be</p> <p>18 made to the notification of voluntary</p> <p>19 attendance to interview?</p> <p>20 A. Yes.</p> <p>21 Q. In what respect was that amendment</p> <p>22 requested by you?</p> <p>23 A. In time.</p> <p>24 Q. In what respect? What was it about, the</p> <p>25 amendment?</p> <p style="text-align: center;">Page 192</p>

<p>1 A. I just wanted the reference to the title, 2 Chief Minister, to disappear and to be 3 replaced by a different word that would not 4 exclude in any way whatsoever interviewing 5 Mr Levy in relation to his communications 6 with the CM. It merely required a change 7 from communications with the CM to 8 communications with any person. I mean, 9 Mr McGrail changed it the following day 10 because it just didn't affect the investigation 11 in any way whatsoever, nor indeed their 12 capacity to be able to interview Mr Levy in 13 relation to those communications. 14 Q. Forgive me sounding rude but is the short 15 answer it was about communications 16 between Mr Levy and the Chief Minister? 17 A. At all - the amendment did not achieve 18 that. 19 Q. Did you think there might be messages 20 on Mr Levy's telephone about 36 North? 21 A. Generally? Yes, probably. 22 Q. Did you think that there might be 23 messages on that telephone to the Chief 24 Minister about 36 North? 25 A. Mr Gibbs, I've answered that question.</p> <p style="text-align: center;">Page 193</p>	<p>1 faced at the time and because there was 2 consensus between all of us that that was the 3 best way forward at that moment in time and 4 with[?] affecting how the investigation could 5 proceed after getting the written statement 6 from Mr Levy and with never changing his 7 status as a suspect in the meantime. 8 Q. Did you know what the evidence was 9 against Mr Levy? 10 A. No, no. 11 Q. Did you care? 12 A. At that time, my focus was on managing 13 the situation that we had. That was 14 everyone's focus. 15 Q. It was irrelevant? 16 A. No, I thought that would come if the 17 police continued with the investigation and 18 felt it right and necessary to obtain that 19 evidence. At that moment we were just 20 trying to cater for the issue we had at hand. 21 Q. And finally this. You have said more 22 than once that you were trying to protect the 23 office of the Chief Minister. Is that right? 24 A. Yes. 25 Q. Rather than Mr Picardo himself?</p> <p style="text-align: center;">Page 195</p>
<p>1 What was on my mind were the messages 2 that he may have in relation to the three hats 3 that he wears that I've just described - that is 4 what was on my mind at the time and why I 5 thought the issue of the devices was such a 6 live issue at the time. 7 Q. You were asked yesterday whether you 8 gave Mr Levy special treatment and your 9 answer was that everyone seems to have 10 given him special treatment. So, may I just 11 return to the question: did you give Mr Levy 12 special treatment? 13 A. My answer is like yesterday - yes. 14 Q. No, your answer was that everyone did. 15 A. Yes. 16 Q. Let us talk about, please, if you would not 17 mind, what special treatment you gave Mr 18 Levy. 19 A. I, together with Mr McGrail, Mr 20 Richardson and Mr Rocca, devised a strategy 21 to deal with his interview as reflected in 22 those three meetings. That is what I think is 23 the special treatment that I participated in. 24 Q. Why did you do that? 25 A. Because of the circumstances that we</p> <p style="text-align: center;">Page 194</p>	<p>1 A. Yes. 2 Q. And if the evidence had led to Mr 3 Picardo, how would the office of Chief 4 Minister best have been protected? 5 A. Well, the investigation would have 6 continued its course. 7 Q. But would the office of Chief Minister of 8 Gibraltar in those circumstances best have 9 been protected by protecting the individual 10 from the evidence or by protecting the office 11 from the officeholder? 12 A. As I say in the transcripts - I think it's 13 with Mr McGrail that I tell him, "If you've 14 got a smoking gun against the Chief 15 Minister" - not that I think there was - "I 16 can't do anything." It would bring me to 17 tears because the investigation would 18 continue ahead. So I think that answers your 19 questions quite clearly, I think. 20 MR GIBBS: Thank you. 21 Questioned by MR CRUZ 22 Q. Good afternoon. 23 A. Good afternoon. 24 THE CHAIRMAN: Briefly. 25 MR CRUZ: Sorry?</p> <p style="text-align: center;">Page 196</p>

<p>1 THE CHAIRMAN: Briefly.</p> <p>2 MR CRUZ: Yes, sir. (To the witness) Just</p> <p>3 one point of clarification on another matter</p> <p>4 and we will go back to this that you have just</p> <p>5 been looking at, and it is just because I think</p> <p>6 it might be helpful to remind you - can we</p> <p>7 go to A 808? This is the second witness</p> <p>8 statement of Mr Field. Can I go to paragraph</p> <p>9 6? This is in relation to the Kram issue. Just</p> <p>10 the last paragraph. So, you said yesterday</p> <p>11 that you did not think you had had a chart or</p> <p>12 a map or plotted anything, at least not on 8</p> <p>13 March. You see here Mr Field says, and we</p> <p>14 will go to these paragraphs in a moment, " ...</p> <p>15 paragraphs 36 and 38 I refer to a report from</p> <p>16 Inspector Paul Chipolina (which, for the sake</p> <p>17 of clarity was a verbal report)", all right? So,</p> <p>18 that is from the Spanish Guardia Civil, just to</p> <p>19 remind you, "containing the coordinates</p> <p>20 which were then plotted on a map. I tender a</p> <p>21 copy of the map which I believe is a copy of</p> <p>22 the map I showed the Commissioner,</p> <p>23 Detective Superintendent Paul Richardson</p> <p>24 and the Attorney General, Mr Llamas." So,</p> <p>25 he is making a reference there to 8 March</p> <p style="text-align: center;">Page 197</p>	<p>1 A. Sorry, as far as?</p> <p>2 Q. Prior to becoming Attorney General,</p> <p>3 what was your role insofar as Gibraltar is</p> <p>4 concerned?</p> <p>5 A. I was the Chief Legal Adviser in the</p> <p>6 government department which carried the</p> <p>7 title of EU and International Law Department</p> <p>8 and I was the Chief Legal Adviser there.</p> <p>9 Q. Yes. Would it be fair to say that for</p> <p>10 decades you have been protecting Gibraltar's</p> <p>11 reputation?</p> <p>12 A. Absolutely.</p> <p>13 Q. And many people in Gibraltar are grateful</p> <p>14 for that.</p> <p>15 A. Thank you.</p> <p>16 Q. Now, when you become Attorney</p> <p>17 General, do you recognise that there is a</p> <p>18 change of role, a change of responsibility</p> <p>19 from what you have just described - what I</p> <p>20 have just described and you have agreed?</p> <p>21 A. It depends what you mean by that</p> <p>22 question. It's a very wide question.</p> <p>23 Q. Okay, I will be more specific. Section 59</p> <p>24 of the Constitution. The Attorney General's</p> <p>25 role. Would you agree that it is different to</p> <p style="text-align: center;">Page 199</p>
<p>1 because Mr Pyle was not in the meeting at</p> <p>2 that stage. It was 9 March, you remember,</p> <p>3 that Mr Pyle was there, so would you accept</p> <p>4 that you were shown a map by Mr Field on 8</p> <p>5 March?</p> <p>6 A. Well, yesterday I said that I could</p> <p>7 remember distinctly the six nautical miles but</p> <p>8 not the coordinates or even less the map, but</p> <p>9 now that you've brought this to my attention,</p> <p>10 I am more than happy to accept that I saw</p> <p>11 that.</p> <p>12 Q. That is fine. I think it is helpful to the</p> <p>13 Chairman to know that you saw that. And in</p> <p>14 relation to that, do you think it would be, to</p> <p>15 use your language, implausible that that was</p> <p>16 not on the table, so to speak, an hour later</p> <p>17 when Mr Pyle turned up?</p> <p>18 A. I was not in that meeting.</p> <p>19 Q. No, you were not. Okay, so leave Kram</p> <p>20 for a moment. Let me ask you a general</p> <p>21 question. I am going to try to go through this</p> <p>22 quite quickly given the heads up I have been</p> <p>23 given by the Chairman. Prior to becoming an</p> <p>24 Attorney General, what was your role insofar</p> <p>25 as Gibraltar is concerned?</p> <p style="text-align: center;">Page 198</p>	<p>1 the previous incarnation, the assistance you</p> <p>2 were giving government?</p> <p>3 A. From the moment I delegated the</p> <p>4 prosecutorial functions to the DPP, I am left</p> <p>5 largely with what I was doing prior to</p> <p>6 becoming Attorney General, so yes, the</p> <p>7 function changes. The superintendent's role</p> <p>8 is there, but the day-to-day work, especially</p> <p>9 with what happened the year after, taking the</p> <p>10 office, the work has largely remained the</p> <p>11 same.</p> <p>12 Q. Which is about protecting Gibraltar's</p> <p>13 reputation and Gibraltar's interests?</p> <p>14 A. Well, I would describe my work there in</p> <p>15 the intersection between diplomatic affairs</p> <p>16 and relations and European law and the</p> <p>17 challenges and opportunity offered by</p> <p>18 European law to this jurisdiction. As you</p> <p>19 know, Mr Cruz, European law has been -</p> <p>20 THE CHAIRMAN: I think we have heard</p> <p>21 enough about European law.</p> <p>22 MR CRUZ: Mr Llamas, you are very</p> <p>23 familiar with the Constitution, I think.</p> <p>24 Would it be fair to say you are familiar with</p> <p>25 sections 47 and 48, the establishment of the</p> <p style="text-align: center;">Page 200</p>

50 (Pages 197 to 200)

<p>1 Police Authority? 2 A. (no reply) 3 Q. Yes? Is that a "yes"? 4 A. Yes. 5 Q. And the importances given to the 6 independence of its function. 7 A. Yes. 8 Q. Okay, and without going to the sections, 9 would you accept that the police authority 10 has responsibility for the Police Force unless 11 there is a default in which case it goes to the 12 governor under section 13? 13 A. Yes. 14 Q. And the operational role is the 15 Commissioner of Police? 16 A. That's correct. 17 Q. And only the Commissioner of Police? 18 A. Correct. 19 Q. So, in terms of the investigations into 20 Operation Delhi, they fall to the 21 Commissioner of Police and nobody else and 22 the people under him? 23 A. Yes. 24 Q. Would you accept that the people who 25 were responsible for this investigation were</p> <p style="text-align: center;">Page 201</p>	<p>1 Q. The two I have just referred to. 2 A. (no reply) 3 Q. Well, can we have it on the screen? B3, 4 610. 5 A. No, but the answer is no, I would not 6 have been aware of that. 7 Q. All right, so this is an email sent by Mr 8 Richardson to Mr Rocca in advance of a 9 meeting that they then had virtually on the 8th 10 and in advance of your discussion with Mr 11 Rocca on the 6th and it is dated 1 April. It is 12 B3, 610. And in this document, there is a 13 reference at paragraph 3 to the NDM 14 assessment and then subsequently to the 15 advice. Now, it would be fair to say, would 16 you agree, that Mr Rocca had the benefit of 17 these documents when he was advising the 18 police on 8 April? 19 A. Yes. 20 Q. And I think you made reference to it 21 yesterday, but can you just take it as given, 22 unless you disagree with what I am about to 23 say, that in these documents it is plainly 24 evident that the plan is to carry out a search 25 warrant and interview Mr Levy under</p> <p style="text-align: center;">Page 203</p>
<p>1 the senior investigating officer, Mr 2 Richardson, and Mr Wyan? 3 A. Correct. 4 Q. Okay. So, in terms of the day-to-day 5 interaction, insofar as that investigation was 6 concerned, and the extent to which you had 7 any knowledge, it would be fair to say you 8 had none? 9 A. Of? 10 Q. No knowledge of any details of those 11 investigations? 12 A. Correct. 13 Q. Correct. Now, you may recall that you 14 referred to the NDM model and the charging 15 advice that you read about a year after - a 16 year ago, I think. 17 A. The charging advice. 18 Q. Yes, and the NDM model. You were - 19 A. No, the NDM? 20 Q. You took us to it yesterday. 21 A. The NDM I read for the purposes of the 22 inquiry. 23 Q. Yes. Now, on 1 April, are you aware that 24 these documents were sent to the DPP? 25 A. Which documents?</p> <p style="text-align: center;">Page 202</p>	<p>1 caution? Would you accept that, having seen 2 (inaudible?) 3 A. Yes, yes. 4 Q. No doubt about that? 5 A. I think so, yes. That's my recollection. 6 Q. Yes, and additionally, in the NDM, there 7 is also a reference to the attack that is likely 8 to be received from Hassans Law? 9 A. Correct. 10 Q. Correct. So, that is the plan, that is the 11 expectation. Would you agree with that? 12 A. That is what the NDM says, yes. 13 Q. Yes. So, to your knowledge, Mr Rocca 14 nor you at any stage turned round to these 15 police officers and said, "Don't do that"? 16 A. I had not seen that document. 17 Q. Well, to your knowledge, did Mr Rocca 18 ever do that? 19 A. I think Mr Rocca addressed that issue in 20 his evidence. 21 Q. Yes. 22 A. I mean, I can't remember what he said. I 23 think he said he read - he gave more 24 importance - 25 Q. He did.</p> <p style="text-align: center;">Page 204</p>

51 (Pages 201 to 204)

<p>1 A. - to the charging advice than the NDM 2 report because he saw that as an operational 3 matter. 4 Q. Correct, correct. So, there was no such 5 warning. So, the people who know about the 6 details are the police, Mr Richardson, Mr 7 Wyan, Mr Zamitt, who we heard, Crown 8 Counsel involved in the case, and Mr Rocca, 9 DPP. And they knew all about this plan, 10 exactly what was going to happen next. 11 A. (no reply) 12 Q. Would you accept that? 13 A. That seems to be the case, yes. 14 Q. Yes. Now, the investigation has been 15 described as thoroughly professional, astute. 16 Forensically, Mr Rocca described it as 17 thorough and good. Would you have any 18 reason to disbelieve that? 19 A. If that is Mr Rocca's view, I believe that. 20 Q. Did you have any basis upon which to 21 disbelieve it when you engaged in the 22 process on 7 April? 23 A. No, my only concern that got anywhere 24 near that sort of issue was what Mr Rocca 25 had told me was the very - the excessive</p> <p style="text-align: center;">Page 205</p>	<p>1 letter follows shortly thereafter; there are 2 applications being made to the magistrates' 3 court. 4 Q. Can I stop you there? Not because - it's 5 just because of the time issue. The Hassans 6 issue - if I can call this broadly the challenge 7 - 8 A. Yes. 9 Q. Could I summarise it fairly in saying, 10 "the challenge"? 11 A. Yes, it's quite - yes, let's call it, for 12 shorthand that. 13 Q. Yes. The expected challenge? 14 A. At that stage the expected challenge. 15 Q. Right, so there was nothing to resolve or 16 crisis. All there was was the expected 17 challenge. 18 A. Yes, and the serious allegations being 19 made. 20 Q. Yes. Now, can I ask you just to remind 21 yourself of - I think it is in the transcript. I 22 think it is B 277 and I think it is at the 23 bottom. Yes, there is a comment here you 24 might want to read it. 25 A. Mine or Mr McGrail's?</p> <p style="text-align: center;">Page 207</p>
<p>1 number of charges. 2 Q. Right. Now, we will go to that in a 3 second. Insofar as that is concerned - before 4 we go to that, Mr Rocca also described the 5 officers as good officers, or I put the question 6 to him and he agreed: Mr Richardson, Mr 7 Wyan being good officers? 8 A. I think he said that, yes. 9 Q. Right, so if I can just unpack that: a 10 thorough investigation, a good investigation, 11 good officers, people in the know, a plan. 12 Was not the logical next step the execution of 13 that plan? 14 A. That's a matter for the RGP. 15 Q. It is. It was a matter for the RGP. And 16 you know that that is what they did on 12 17 May? 18 A. Correct. 19 Q. Correct. So, in the context of that, my 20 learned friend touched on this - what was the 21 crisis of the issue that needed resolving? 22 A. The letters arriving from Hassans on the 23 12th; the serious allegations being made; the 24 fact that Mr McGrail asked to see me for 25 legal advice; we meet the first time; a second</p> <p style="text-align: center;">Page 206</p>	<p>1 Q. No, no, Mr McGrail's. Sorry, the very 2 bottom, or shall I read it out loud: "I accept 3 this because in a couple of months' time we 4 could potentially be discussing the same 5 matter and if we are not, questions will be 6 asked, 'Why not?' when we talk about 7 another barrister who's in the radar and if 8 we're handling this barrister in that way, then 9 why isn't another barrister handled in the 10 other way?" Now, you are familiar that there 11 was an arrest, a warrant issued, an arrest, a 12 search in relation to another barrister 13 involved in another matter in Gibraltar? 14 A. Yes. 15 Q. And that was challengeable in judicial 16 review? 17 A. Yes. 18 Q. And in fact there has been a recent 19 judgment on it. 20 A. Indeed. 21 Q. Needless to say that six out of seven 22 grounds were rejected, one was found, but it 23 was a process, was it not? It was a legal 24 process? 25 A. Yes.</p> <p style="text-align: center;">Page 208</p>

52 (Pages 205 to 208)

<p>1 Q. So, in that other case, which is perhaps 2 what I suggest the Commissioner of Police 3 may have been alluding to, there was just a 4 plan, an execution of a plan and what is a 5 normal legal challenge, nothing, not a crisis, 6 just a process? 7 A. (no reply) 8 Q. Would you accept that? 9 A. Yes, absolutely. 10 Q. So, really when you look at the Operation 11 Delhi, there was no crisis nor something to 12 resolve or to de-escalate; it was just a process 13 which I would ask you should you really 14 have got involved in at all? 15 A. I got involved because Mr McGrail asked 16 to see me on 13 March and letters were 17 addressed to me. Look, I don't know the 18 specific facts of that other case that you are 19 talking about. Maybe it was a clear-cut case 20 for a search warrant, I just don't know. I 21 mean, I can't compare one case to the other. 22 Q. I understand that. You did not have facts 23 on this case either, the evidence in this case, 24 did you? 25 A. What's -</p> <p style="text-align: center;">Page 209</p>	<p>1 A. This is the same meeting where I read out 2 yesterday Mr McGrail's comment one hour 3 into the meeting where he is giving us the 4 thanks for consulting. 5 Q. So, Mr Wyan has said, "Highly unusual. 6 We left and ultimately proceeded with a 7 course of action that was highly unusual". 8 Would you accept that? 9 A. No, I wouldn't accept that. 10 Q. The last couple of questions. Now, Mr 11 Wyan was asked whether or not he got the 12 appropriate legal support and he said, "The 13 level of support was such that we felt 14 adequately protected", was the question, "that 15 he was not sure" - sorry, "that he was not 16 sure that the level of support that we felt 17 adequately protected us." Would you with 18 hindsight agree with that? 19 A. No. 20 Q. Mr Llamas, in your witness statement, the 21 first one, at paragraph 2 you describe your 22 roles and you included advising the RGP. 23 A. (no reply) 24 Q. In your witness statement. 25 A. Yes, I've got it in front of me.</p> <p style="text-align: center;">Page 211</p>
<p>1 Q. The (inaudible) case. 2 A. But what I did have is the brief that Mr 3 Rocca had given me on 6 April. 4 Q. Right. So, my learned friend Mr Gibbs 5 referred to Mr Wyan's description of matters. 6 It actually was on the 15th, not the 13th. It is a 7 matter which is in day five transcript at pages 8 196/197. We do not have to go there, but 9 just to correct the record, that was 15 May 10 and Mr Wyan described it as strange, not 11 what was expected, a conversation about a 12 problem. "How do we solve a problem?", the 13 problem being Mr Levy and the intention to 14 interview him under caution. He described 15 the meeting as an almost facilitation, perhaps 16 negotiation. Given your descriptions - crisis, 17 sorting out an issue - would that be fair 18 description by Mr Wyan of what happened? 19 A. It can be one way of putting it. I wouldn't 20 put it that way. I'd put it in the way that we 21 were consult - I mean, I've repeated this 22 many times already - it was a collegiate 23 exercise to deal with that situation in which 24 the four of us agreed the way forward. 25 Q. Right.</p> <p style="text-align: center;">Page 210</p>	<p>1 Q. Yes. I put it to you that not only wasn't it 2 an adequate protection, given the plan, and 3 given how other people are treated, but it was 4 fundamentally an abdication of your 5 responsibilities as Attorney General to 6 intervene in the manner that you did here. 7 A. Well, I obviously don't accept that. 8 MR CRUZ: Thank you, Mr Llamas. 9 THE CHAIRMAN: We had better take a 10 break. 11 (15.28) 12 (Adjourned for a short time) 13 (15.38) 14 THE CHAIRMAN: Sir Peter, I don't want 15 there to be any misunderstanding about this, 16 your preference is to proceed now until we 17 finish? 18 SIR PETER CARUANA: Sir, I am going to 19 try and hope to succeed in my attempt to 20 finish by 5 o'clock, if you would stretch that 21 far. 22 THE CHAIRMAN: If you need to go on 23 longer, within reason, that is fair enough. 24 SIR PETER CARUANA: We are grateful. 25 We have had that indication from CTI for</p> <p style="text-align: center;">Page 212</p>

<p>1 which we are grateful, but my preference 2 would be to finish. 3 THE CHAIRMAN: And you are happy to 4 carry on, are you? 5 THE WITNESS: Absolutely. 6 THE CHAIRMAN: Okay, but if either of 7 you wants to stop, I will leave it to you. 8 Questioned by SIR PETER CARUANA 9 SIR PETER CARUANA: Mr Llamas, just to 10 start with some of the points that have been 11 made at the end so that we can dispose of 12 them. The point nine of the request for 13 attendance at voluntary interview where you 14 asked for the reference to Chief Minister to 15 be removed from point nine, do you 16 remember that? 17 A. Yes. 18 Q. My learned friend Mr Gibbs asked you. 19 Just to be clear, if there were terribly, terribly 20 damaging and terribly, terribly suspicious 21 and terribly, terribly improper 22 communications between Mr Levy and the 23 Chief Minister on the device about 36 North 24 and many other things, would what you ask 25 the police to do have prevented the police</p> <p style="text-align: center;">Page 213</p>	<p>1 General as a cabinet minister to consult with 2 other ministers or not, and to keep 3 independent from them, absolutely not. 4 Q. But even if the Shawcross Principle did 5 not exist, you would still have a statutory 6 duty of independence, so the Shawcross 7 Principle adds nothing, I am inviting you to 8 suggest -- 9 A. I think that's a legitimate -- 10 Q. -- to what our constitution already 11 requires of you? 12 A. Yes. 13 Q. Now, my learned friend Mr Gibbs -- I 14 have been warned about my arguments with 15 the microphone I will try to prevent them -- 16 put to you that Mr DiVincenzi, sending you 17 the Trudeau Report and reminding you of the 18 Shawcross Principles, may have been 19 showing you the straight path. Do you 20 remember him saying that? 21 A. I do. 22 Q. And I think you answered him that you 23 thought you were on the straight path, or 24 words to that effect. Did you hear Mr 25 DiVincenzi's evidence?</p> <p style="text-align: center;">Page 215</p>
<p>1 from seeing those emails? 2 A. Nothing. 3 Q. Those messages. So is there any link 4 between the cloak and dagger motives of 5 why you might have been wanting to prevent 6 it and what you asked the police to do? 7 A. Absolutely. 8 Q. The Shawcross Principles. The 9 Shawcross Principles apply in the UK, am I 10 right. Are you aware of the Shawcross 11 Principles? 12 A. Yes, I think it applies in common law 13 jurisdictions where the Attorney General is 14 also a politician. 15 Q. Yes. Does it have any application to 16 Gibraltar, given that you have a 17 constitutional, which is our primary statute, 18 obligation for independence in the discharge 19 of your functions? 20 A. Absolutely, and indeed that the 21 appointment is not a political appointment. 22 Q. So is there any need in Gibraltar to rely 23 on the Shawcross Principle as there is in the 24 UK? 25 A. Insofar as it requires the Attorney</p> <p style="text-align: center;">Page 214</p>	<p>1 A. Yes. 2 Q. Did you hear him describe you as an 3 honest and decent lawyer? 4 A. Yes. 5 Q. Did you hear him say on oath that he did 6 not think that you were interfering? 7 A. Yes. 8 Q. And that he did not think that you had 9 incurred in any improper actions? 10 A. Yes. 11 Q. Or that you were -- he did not get any 12 sense that you were motivated by any 13 improper motives? 14 A. Yes, I did. 15 Q. Well, in those circumstances, do you 16 think there is any need to suspect that he 17 might have been showing you the straight 18 path? 19 A. Absolutely not. 20 Q. When you refer to "protecting the office 21 of the Chief Minister", do you mean 22 regardless of whether -- do you mean 23 regardless of the conduct of the Chief 24 Minister, regardless of the propriety of the 25 conduct of the Chief Minister?</p> <p style="text-align: center;">Page 216</p>

<p>1 A. No, not regardless of the conduct. I made that clear.</p> <p>2</p> <p>3 Q. So, if a Chief Minister were to incur in</p> <p>4 improper conduct, would your concern to</p> <p>5 protect the jurisdiction's reputation lead you</p> <p>6 to protect a chief minister in those</p> <p>7 circumstances?</p> <p>8 A. No, as I think I replied to Mr Gibbs and</p> <p>9 as I say in the transcript, the references to the</p> <p>10 smoking gun and I can't stop, of course not.</p> <p>11 Q. To your knowledge, has the Chief</p> <p>12 Minister ever been -- the incumbent Chief</p> <p>13 Minister, I am glad to think that you would</p> <p>14 done the same for me -- but was the Chief</p> <p>15 Minister, the current Chief Minister, ever a</p> <p>16 suspect in this investigation, as far as you are</p> <p>17 aware?</p> <p>18 A. As far as I am aware, he never was.</p> <p>19 Q. Can you put on the screen please, B109,</p> <p>20 at the bottom of the page there, thank you Mr</p> <p>21 Triay. You have there on screen at the</p> <p>22 bottom in that lengthy dialogue box by you,</p> <p>23 would you just like to read that to yourself.</p> <p>24 For yourself, I could read it for you. (Pause)</p> <p>25 Just the first.</p> <p style="text-align: center;">Page 217</p>	<p>1 A. No, that was not what was agreed.</p> <p>2 Q. Okay. Can we go back to the bottom of</p> <p>3 the previous page. I don't know how quick</p> <p>4 your mathematics are, but he sent his</p> <p>5 WhatsApp at 12.26.52. What was the time of</p> <p>6 your immediate reaction, your first reaction?</p> <p>7 A. 12.28.15.</p> <p>8 Q. Yes. I am told that that is 1 minute and</p> <p>9 23 seconds. Were you alone?</p> <p>10 A. I can't remember.</p> <p>11 Q. Do you agree that that is your immediate</p> <p>12 reaction?</p> <p>13 A. Well yes, considering the time gap, it's</p> <p>14 my immediate reaction, yes.</p> <p>15 Q. So your most contemporaneous reactions</p> <p>16 in terms of what you believed you had agreed</p> <p>17 was this, just one minute?</p> <p>18 A. I agree.</p> <p>19 Q. And the paragraph that we saw that I put</p> <p>20 to you first, which is the opening exchanges</p> <p>21 in the meeting of 13 July, the very next day?</p> <p>22 A. Yes, it is exactly the same thing.</p> <p>23 THE CHAIRMAN: I think you had better</p> <p>24 look at Mr McGrail's immediate reaction to</p> <p>25 that.</p> <p style="text-align: center;">Page 219</p>
<p>1 A. I've read it.</p> <p>2 Q. Yes. You say, "For me it was absolutely</p> <p>3 clear", and you go on to describe the</p> <p>4 rationalisation of grounds, is that still your</p> <p>5 view today?</p> <p>6 A. Absolutely.</p> <p>7 Q. Can we turn up C6925 and if we could go</p> <p>8 down to the entry at 12.26. So at 12.26 Mr</p> <p>9 McGrail sends you the same WhatsApp as he</p> <p>10 sent the Chief Minister, "Before you hear it</p> <p>11 from anyone else, I want to inform you that</p> <p>12 detectives are executing a search warrant</p> <p>13 ...", etc. So that is the information meeting,</p> <p>14 courtesy apparently. What was your</p> <p>15 response?</p> <p>16 A. Well, as I say there, I mean my response -</p> <p>17 -</p> <p>18 Q. Well, just read it out.</p> <p>19 A. I said, "Ian, we had agreed that you</p> <p>20 would come to me with a rationalisation of</p> <p>21 the charges before doing anything."</p> <p>22 Q. And he says, "We agreed we'd do that</p> <p>23 when all the loose ends were tied up and this</p> <p>24 included the inquiries with JL", and you</p> <p>25 answered?</p> <p style="text-align: center;">Page 218</p>	<p>1 SIR PETER CARUANA: I beg your</p> <p>2 pardon?</p> <p>3 THE CHAIRMAN: You'd better look at Mr</p> <p>4 McGrail's immediate reaction to that.</p> <p>5 SIR PETER CARUANA: I have read out Mr</p> <p>6 McGrail's immediate reaction, sir, when I</p> <p>7 was reading out Mr Llamas's. But if you</p> <p>8 think it is necessary for me to read it out a</p> <p>9 second time I will.</p> <p>10 THE CHAIRMAN: It is rather misleading to</p> <p>11 stress one without the other.</p> <p>12 SIR PETER CARUANA: I have not stressed</p> <p>13 one and not the other. I have read them both</p> <p>14 out, sir, before your intervention. Can we</p> <p>15 have on screen the car transcript. I don't</p> <p>16 know what number you've given it. I would</p> <p>17 like to go halfway down the second page</p> <p>18 where he says he understands. Do you see?</p> <p>19 I beg your pardon, it is the third page. IM,</p> <p>20 this was what Mr McGrail said to Mr</p> <p>21 Richardson in the back of the car</p> <p>22 immediately after your private chat at the end</p> <p>23 of 13 May meeting:</p> <p>24 "He understands", speaking about you, "that</p> <p>25 this is not what, er, what was said in the way</p> <p style="text-align: center;">Page 220</p>

55 (Pages 217 to 220)

<p>1 in which it was interpreted." 2 Did you, in your meeting with Mr McGrail, 3 convey to him that you accepted that there 4 had been a misunderstanding? 5 A. A misunderstanding in relation to what? 6 Q. As to whether there had been an 7 agreement between him -- 8 A. On 7 April? 9 Q. Yes. 10 A. I mean, it's in the transcript. I said that 11 eventually I think the words were 12 "Eventually". 13 Q. Yes, okay. Yes. I am about to take you 14 there if you'd like to see that. 228, please. 15 A. Yes, "I will eventually accept ..." 16 Q. The box immediately -- that's what you 17 said to him, but I'd like to take you to the box 18 before that. I mean, we have already seen 19 what you said at the beginning of 13 May 20 meeting, now this is what you say to him in 21 your private meeting after the others had left. 22 You say, "Okay, but I cannot resist it and 23 that's why I could see you ... I could see you 24 for now. We, we, we've had to and look, I'm 25 glad that we've met but for me, it was clear</p> <p style="text-align: center;">Page 221</p>	<p>1 that you were not agreeing with Mr McGrail 2 as he had indicated to Mr ... that there had 3 been an acceptance by you of a 4 misunderstanding between you? 5 A. No, I think it is clear from that transcript 6 what was agreed in my mind on 7 April was 7 clear, but in due course I would say look, 8 there was just a misunderstanding between us 9 if that would help to defuse the situation 10 going forward. 11 Q. I see, okay. So, the meetings of May 12 were briefly in your opinion, for what 13 purpose? 14 A. For a number of purposes. They were to 15 defend the RGP from the letters and the 16 allegations made in the Hassans's letters. 17 They were to make sure that investigation 18 against the three then defendants went ahead. 19 They were to deal with the best way of 20 getting evidence from Mr Levy, to never 21 change his status as a suspect in relation to 22 the investigation. We were dealing with a 23 specific issue of misfeasance that Mr 24 Richardson was very troubled with. 25 Q. And was it an objective amongst all the</p> <p style="text-align: center;">Page 223</p>
<p>1 what we agreed in this meeting yesterday." 2 Yesterday, and indeed, sir, there is a 3 transcription error there, because the word 4 yesterday is in the -- and that has been 5 corrected and the CTI has picked it up. This 6 was on the 12th, "but for me it was clear 7 what we agreed in this meeting yesterday", is 8 not correct. What had happened yesterday 9 was the berating, correct? 10 A. Yes. 11 Q. The agreement had actually taken place, 12 the full stop -- "yesterday" is just on the 13 wrong side of the full stop. "Yesterday", 14 now you are describing your reaction at the 15 berating meeting the day before, "you don't 16 know what went through my body when I 17 saw your WhatsApp yesterday. Forget 18 Attorney General, Commissioner of Police, 19 at a personal level, Ian McGrail with Michael 20 Llamas. He says, "Mm", and then you said, 21 "That is what I want to tell you, more than 22 anything, it has never happened before. I 23 will eventually accept that there was a 24 misunderstanding between us, because that is 25 the type of person that I am." Do you agree</p> <p style="text-align: center;">Page 222</p>	<p>1 ones that you've listed, to achieve those 2 things in a way which did not curtail the 3 RGP's possibility to proceed in the future 4 thereafter as they pleased? 5 A. Well, that's what I meant by not changing 6 Mr Levy's status as a suspect. Absolutely. 7 Q. Did you have any sense during those 8 meetings that the police felt that they were 9 being cajoled or pressured? 10 A. No. 11 Q. My learned friend, Mr Gibbs -- in fact my 12 learned friend Mr Wagner, I do beg Mr 13 Gibbs's pardon, put to you that you needed to 14 tread carefully in criminal law, always taking 15 the advice from the DPP, because of your 16 admitted lack of familiarity with criminal law 17 matters. Do you recall that? 18 A. Yes. 19 (15.56) 20 Q. In these meetings did you allow yourself 21 to be guided by the DPP? 22 A. Absolutely. 23 Q. Were any of the ideas that emerged in the 24 discussions throughout the meetings --- did 25 any originate with you?</p> <p style="text-align: center;">Page 224</p>

56 (Pages 221 to 224)

<p>1 A. I don't think so. Even if I was proposing 2 any particular idea, especially on the meeting 3 on the 15th, I would have discussed that 4 previously with Mr Rocca. I just didn't have 5 the knowledge of criminal law to be able to 6 propose that unless he had told me. 7 Q. So in your view you felt that you were 8 doing exactly what Mr Wagner said that you 9 needed to do which was to proceed by the 10 hand of the DPP? 11 A. Absolutely. 12 Q. In respect of the meeting on 13 May in 13 his oral opening Mr Wagner said that it was 14 an inevitable conclusion from the transcripts 15 that you appeared to be advocating the 16 position of Mr Levy and substantially trying 17 to minimise the RGP's actions that they were 18 about to take. Do you agree with that? 19 A. Not at all. 20 Q. Can we look at B224 --- I beg your 21 pardon, I have got B224 at the top of the 22 page. Is that the transcript? Do you recall 23 my learned friend, Mr Wagner, putting this to 24 you as evidence that you were batting for Mr 25 Levy for short and, if so, I believe ----</p> <p style="text-align: center;">Page 225</p>	<p>1 Rocca at the bottom? 2 A. Yes. 3 Q. I think that there is a simple way to 4 defuse that paragraph, that is concerning 5 paragraph you have certainly picked up, "I 6 would reply saying --- given the allegations 7 you are making will sit there seven days, it's 8 in a sealed bag, it will not be touched. If you 9 think you have grounds for making legal 10 applications to any court of law for review, 11 for an appeal" now we can look at the 12 timings again by going back to B224, but that 13 was long before you made the reference that 14 I first pointed out to, so whose idea --- whose 15 suggestion was it in the 13 May meeting --- 16 my understanding may be wrong but the 17 principal thing that emerged from the 13 May 18 meeting was the seven day moratorium for 19 them to put up or shut up ---- 20 A. Yes. 21 Q. --- with their legal challenge ---- 22 A. Exactly. 23 Q. --- is that correct? 24 A. Exactly. 25 Q. I mean that is really what emerged from</p> <p style="text-align: center;">Page 227</p>
<p>1 A. I am sorry, I can't see that. 2 Q. Yes, the first dialogue box, "Exactly, I 3 believe this is the big issue so I believe you 4 have to provide them that guarantee that no 5 one is touching it." Do you recall Mr 6 Wagner putting that to you? 7 MR WAGNER: I am sorry, I did not put 8 anything to Mr Llamas and I did not put 9 anything to him as evidence of batting for Mr 10 Levy. 11 SIR PETER CARUANA: No, no, to Mr 12 Llamas, sorry. 13 MR WAGNER: I did not --- I don't 14 remember asking those questions. 15 SIR PETER CARUANA: I beg your pardon, 16 I am being corrected, it was in your oral 17 opening that you made this remark. (To the 18 witness): Can you go to B197, at the bottom 19 of 197 and 198 --- sorry, sir, I am trying to 20 work from the version that you are working 21 from. 22 THE CHAIRMAN: No, understand. 23 SIR PETER CARUANA: And so I am not 24 familiar with these page numbers. (To the 25 witness): Do you see the dialogue box by Mr</p> <p style="text-align: center;">Page 226</p>	<p>1 the 13 May meeting? 2 A. In addition to dealing with the 12 May 3 letter, yes. 4 Q. Who put that proposal first to the meeting 5 then? 6 A. It was Mr Rocca. 7 Q. Do you think that the Director of Public 8 Prosecutions was batting for Mr Levy? 9 A. Not at all. 10 Q. As you stand charged of doing? 11 A. Not at all. 12 Q. In the 15 May meeting the CTI took you 13 to --- that is my learned friend, Mr Santos, 14 took you to a number of references at page 15 270 and 271. They can go on the screen if 16 you want, although it is not necessary, but 17 270 is, "Okay, chat, we are spending quite a 18 lot of time with Christian," we have seen that 19 several times now, and over the page, you 20 said, "Okay, but my understanding ..." and 21 you said, "Correct, Christian and I are ready 22 on that," and I think that Mr Santos' point 23 was limited to getting you to agree, which 24 you did, that you were supportive of that? 25 A. Yes.</p> <p style="text-align: center;">Page 228</p>

57 (Pages 225 to 228)

<p>1 Q. "What we think would be helpful for the 2 management of the whole thing is if that 3 interview would still go ahead but not have it 4 under caution." Do you recall whether that 5 idea was yours or Mr Rocca's? 6 A. It can only be Mr Rocca's. 7 THE CHAIRMAN: He has already said that 8 to Mr Santos. 9 SIR PETER CARUANA: I beg your 10 pardon? 11 THE CHAIRMAN: He said that to Mr 12 Santos. 13 SIR PETER CARUANA: Yes; well, we 14 have heard a lot of things today that have 15 been said already before but I think it is 16 important to give the witness the opportunity 17 to say it. (To the witness): When my learned 18 friend, Mr Gibbs, says that it is quicker and 19 easier to achieve your --- the objectives --- 20 the line of questions that they put to you 21 clearly or seek to impute to you --- in other 22 words, the same thing as would be achieved 23 effectively by a nolle or by a non- 24 proceedings, did you yourself propose 25 anything of your --- that emanated from you</p> <p style="text-align: center;">Page 229</p>	<p>1 would make a "no comment" interview on 18 2 May. 3 Q. Did you --- and was that proposed and/or 4 agreed instead of an interview under caution 5 if that is what emerged? What was the link 6 between that and a possible different 7 management later? 8 A. Nothing. This was just a first step to try 9 to elicit evidence from Mr Levy without 10 prejudice to any lines of enquiries that the 11 RGP may wish to seek thereafter. I think 12 that is quite clear from the transcript. 13 Q. With the possibility that if Mr Levy could 14 persuade the RGP to lose interest in him, 15 they would and could if they chose to? 16 A. It's up to them. 17 Q. And if they chose not to? 18 A. It's up to them. 19 Q. They could have --- they were free to 20 proceed ---- 21 A. It's up to them, yes. 22 Q. Did you or Mr Rocca make even the 23 slightest suggestion that would have led the 24 RGP to take the view that their future powers 25 were being curtailed?</p> <p style="text-align: center;">Page 231</p>
<p>1 that would have had the effect of ending the 2 RGP's interest in Mr Levy? 3 A. Absolutely not. 4 Q. Did you advocate at any of these 5 meetings or even support that which may 6 have been advocated by somebody else 7 anything which had the effect that a nolle or 8 a discontinuance would have had in the case 9 of Mr Levy? 10 A. Absolutely not. 11 Q. Did you try to stop the investigation of 12 Mr Levy at any of these meetings? 13 A. Absolutely not. 14 Q. Do you recall what actually emerged 15 from the 15 May meeting? We have seen 16 that 13 May was the seven day moratorium 17 on inspections, a put up or shut up period, but 18 do you recall what was the principal thing to 19 emerge from the 15 May meeting? 20 A. My recollection is that that is the meeting 21 where we all agreed that we would try a 22 written statement, to get a written statement 23 from Mr Levy without affecting his status as 24 a suspect and that came on the back of our 25 belief that he would not give any ---that he</p> <p style="text-align: center;">Page 230</p>	<p>1 A. Not at all. 2 Q. Mr Llamas, after the meeting of 20 May, 3 which was the third of the three meetings, so 4 the meeting of the 13th came up with the 5 seven day moratorium on the inspection of 6 devices, the one on the 15th came up with the 7 agreement on the witness statement first, and 8 then the meeting of the 20th --- do you agree 9 that the meeting of the 20th dealt mainly with 10 pushing back on the abusive reaction by 11 Hassans to what had emerged from the 12 meeting of the 15th? 13 A. Exactly. 14 Q. Am I right in saying that they tried to 15 interpret that as Mr Levy is no longer a 16 suspect? 17 A. Yes, I mean, the RGP had offered to 18 accept a written statement and what came 19 back was a letter from Hassans interpreting 20 the written statement as a witness statement 21 and that is what we all were complaining 22 about and had to --- and we discussed how to 23 deal with that as soon as possible. I think 24 that I called Mr Baglietto shortly after that 25 meeting as agreed in the meeting to tell him</p> <p style="text-align: center;">Page 232</p>

<p>1 that this is completely wrong, this is not what 2 the RGP has offered. 3 Q. And so --- I will take you to the 4 transcripts in a moment but I want to do it 5 simultaneously with the next point so as not 6 to have to keep on going back. After the 7 meeting of 20 May did you have any further 8 involvement with the RGP? 9 A. I don't think so. 10 Q. Did have any interaction with the RGP 11 about them not executing the warrant --- or, 12 before going there, are you aware how the 13 warrant was executed or whether I was 14 executed on 12 May? 15 A. What I became aware was of the DPP's 16 concern that he described last week as the 17 unorthodox approach that had been adopted 18 which I now discover was already envisaged 19 in the Options report of the RGP. 20 Q. So as far as you were aware, on the 12th 21 the police had executed the warrant as they 22 had planned to? Or not executed ---- 23 A. Or not, yes. 24 Q. --- the warrant as they had planned to? 25 They did what they had planned?</p> <p style="text-align: center;">Page 233</p>	<p>1 A. Not at all. 2 Q. So in your view, Mr Llamas, do you think 3 you incurred in any behaviour in April or 4 May that is capable of being interpreted as 5 interfering in the RGP's investigation? 6 A. No. 7 Q. Were you seeking to derail the 8 investigation? 9 A. No. 10 Q. What did you do or propose or even agree 11 to that might have been open to that 12 interpretation? 13 A. Nothing. 14 Q. In your view? 15 A. In my view, nothing. 16 Q. The Chairman of course will come to his 17 own view. 18 A. Of course. 19 Q. If you were batting for Mr Levy, could it 20 be said that the Director of Public 21 Prosecutions was batting for him any less? 22 A. I think it's very difficult to divorce his 23 position from mine. 24 Q. And did you take any action that 25 amounted to protection of Mr Levy beyond</p> <p style="text-align: center;">Page 235</p>
<p>1 A. Exactly that. I mean, it is set out in the 2 Options report. 3 Q. After 20 May did you even express a 4 view to anybody about the RGP not 5 executing the warrant or obtaining a new 6 warrant after the 20th? 7 A. No. 8 Q. Did you express a view or have any 9 interaction with the RGP after the 20th about 10 not arresting Mr Levy or not interviewing 11 him under caution as they had been free to do 12 as at the 20th? 13 A. None whatsoever. 14 Q. Did you have any role or express any 15 view to the RGP or anybody else that the 16 RGP should not inspect the devices after the 17 20th? 18 A. None whatsoever. 19 Q. Did you have any role or express any 20 view to anybody about the RGP's decision in 21 October 2020 that Mr Levy should no longer 22 be treated as a suspect and that devices 23 should be returned to him uninspected? 24 A. None whatsoever. 25 Q. Did the DPP confer with you about that?</p> <p style="text-align: center;">Page 234</p>	<p>1 what was agreed, the seven day moratorium 2 and the witness statement first and the RGP 3 to re-assess and decide what to do thereafter? 4 A. No, not at all. 5 THE CHAIRMAN: Not a witness statement 6 but a voluntary statement. 7 SIR PETER CARUANA: A written --- did I 8 say "witness"? 9 THE CHAIRMAN: Yes. 10 SIR PETER CARUANA: I mean to contrast 11 it with a witness statement. I mean a written 12 statement, thank you, sir. (To the witness): 13 Were you batting for Mr Picardo? 14 A. Not at all. 15 Q. Did you do anything that prevented or 16 curtailed the police's ability to access any 17 information or pursue any line of 18 investigation that might have embarrassed or 19 compromised Mr Picardo? 20 A. Not at all. 21 Q. Do you consider, Mr Llamas, that as 22 Attorney General it is obligatory of you to be 23 transparent with the police about who you 24 speak to on the telephone or who you meet 25 with?</p> <p style="text-align: center;">Page 236</p>

<p>1 A. I don't think so.</p> <p>2 Q. Much has been made of whether you --- I</p> <p>3 think it has been conceded now that you were</p> <p>4 fully transparent with your contacts at least</p> <p>5 from the 15th onwards ----</p> <p>6 A. Yes.</p> <p>7 Q. I am not sure you heard that concession</p> <p>8 made but --- so there has been some</p> <p>9 questioning ----</p> <p>10 THE CHAIRMAN: I do not think I have</p> <p>11 heard that concession either.</p> <p>12 SIR PETER CARUANA: You do not think</p> <p>13 so?</p> <p>14 THE CHAIRMAN: No.</p> <p>15 SIR PETER CARUANA: No, not by you?</p> <p>16 All right, we will revisit the transcripts. In</p> <p>17 one of those occasions where you stand up, I</p> <p>18 recall you said precisely that but, never mind,</p> <p>19 we will go through the material then. If there</p> <p>20 is transparency, there is transparency in both</p> <p>21 directions, so we will go through the</p> <p>22 material. It gives us a good opportunity to do</p> <p>23 so. (To the witness): Do you feel that as the</p> <p>24 Attorney General you have any obligation to</p> <p>25 report to the RGP when you have spoken to</p> <p style="text-align: center;">Page 237</p>	<p>1 Originally it was going to be a meeting with</p> <p>2 him and he says it's vital for us to read it, so</p> <p>3 I'm asking" and then Mr McGrail</p> <p>4 intervenes saying that he needs to go for a</p> <p>5 comfort break. Is that a reference by you to</p> <p>6 communications between you and Mr</p> <p>7 Baglietto?</p> <p>8 A. Yes, as I explained this morning I don't</p> <p>9 know if it was --- I was obviously in the</p> <p>10 meeting and whether he called me or he</p> <p>11 called my PA but he wanted us to read a</p> <p>12 letter which we think was the letter that he</p> <p>13 sent to Mr Richardson on the 13th.</p> <p>14 Q. On page B148, the third bottom dialogue</p> <p>15 box by the DPP, "No, I know because I</p> <p>16 looked at it before I came over. I think that</p> <p>17 the unspoken question is that I'll speaking to</p> <p>18 you, do we need to be communicating with</p> <p>19 Lewis quietly, Haime, although he is ticking</p> <p>20 the boxes, isn't and that ... but you don't</p> <p>21 know that yet." "No, so" I am not quite</p> <p>22 sure what to make of the three continuous</p> <p>23 DPP dialogue boxes, so do you agree that</p> <p>24 that is further discussion in the meeting of 13</p> <p>25 May?</p> <p style="text-align: center;">Page 239</p>
<p>1 people who have engaged with you?</p> <p>2 A. No.</p> <p>3 Q. Can we go to the transcript at B124, this</p> <p>4 is 13 May, so dealing first with the telephone</p> <p>5 issue, do you see just above two thirds of the</p> <p>6 way down the page, this is Mr Rocca, "Yeah,</p> <p>7 there is one there and perhaps you need to</p> <p>8 consider whether you need to be replying to</p> <p>9 Lewis saying there is an allegation of</p> <p>10 misfeasance, do you want to make a formal</p> <p>11 complaint," so I think that is the first</p> <p>12 reference to --- do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Do you consider that to be a reference to</p> <p>15 the need to communicate with Mr Baglietto?</p> <p>16 A. Yes, as a possibility.</p> <p>17 Q. So is that the Lewis that is being referred</p> <p>18 to there?</p> <p>19 A. Yes.</p> <p>20 Q. Then if you can turn to page 131, so</p> <p>21 B131, you say in the middle of the page,</p> <p>22 "This has just arrived, Lewis Baglietto has</p> <p>23 called because he has been sent a ..." I'm not</p> <p>24 too sure what to make of the "I'm a ..." "and</p> <p>25 he was made aware of this meeting.</p> <p style="text-align: center;">Page 238</p>	<p>1 A. I agree.</p> <p>2 Q. Then at B156 finally, about six dialogue</p> <p>3 boxes down he seems to be asking you,</p> <p>4 "Give me the opportunity," and you say,</p> <p>5 "Yeah, it is, is it --- is it okay for me to meet</p> <p>6 him, he's asking for a meeting the DPP</p> <p>7 review and the RGP." Mr McGrail, "No."</p> <p>8 Mr Llamas, "But the RGP does not want to</p> <p>9 meet. Maybe you can say --- because it</p> <p>10 seems like a way of saying it's yeah." Senior</p> <p>11 counsel, "It's you." Do you think it is fair to</p> <p>12 say, Mr Llamas, in your assessment --- the</p> <p>13 Chairman will be reading these, he may</p> <p>14 already have done so, but the Chairman will</p> <p>15 be taking --- reading all these transcripts</p> <p>16 himself and form his own views but in your</p> <p>17 view do you think that even in the 13 May</p> <p>18 meeting the possibility and the concept of</p> <p>19 communications with Mr Baglietto was</p> <p>20 already being mooted?</p> <p>21 A. Absolutely, yes.</p> <p>22 Q. If we can just turn briefly --- I want to</p> <p>23 minimise my references to the outcome of</p> <p>24 these transcripts, because, as I say, the</p> <p>25 Chairman has or will read them, but at B153,</p> <p style="text-align: center;">Page 240</p>

60 (Pages 237 to 240)

<p>1 this is now outcome of meeting rather than 2 communications with Mr Baglietto, do you 3 see where you say, "Shall we wrap up"? 4 "Sir, as far as I understand what we've 5 discussed is that Paul is going to reply to the 6" "No, I will, I will," Mr McGrail says, 7 and Mr Llamas, "So you, Ian, is going to 8 reply to this letter?" "Yes." Mr McGrail 9 asking, "to whom," and Superintendent 10 Richardson interjects and says, "Lewis." 11 "No," suggesting it should be to Mr Baglietto 12 and you say, "In relation to the first 13 paragraph after the seventh point, saying that 14 no material has been improperly downloaded 15 until after the interview on Monday," and Mr 16 Richardson says, "Can you please go a bit 17 slower because I want to make sure that I 18 have an accurate record of what we've 19 agreed. No material has been downloaded," 20 and then it goes on in that vein. Do you 21 agree, Mr Llamas, that this wrap up is a fair 22 representation of the atmosphere in the 23 meeting which was one of a discussion 24 followed by an agreement? 25 A. Absolutely, yes.</p> <p style="text-align: center;">Page 241</p>	<p>1 the context of Mr Wagner's last intervention 2 to correct me, that that is you announcing 3 you are perhaps checking whether you would 4 call Mr Baglietto? 5 A. Absolutely. 6 Q. "Let's not make notes until we have 7 agreed this, it might be the sensible thing, 8 somebody is going to call Mr Baglietto" 9 you say, "Someone is going to call Mr Lewis 10 Baglietto, is going to tell him, 'Look, we 11 reserve or the RGP a position a litany of 12 (inaudible) ...'" Mr Richardson, "But doing 13 what Chris said that we believe our actions 14 were lawful and if you don't agree with us, 15 whatever." You say, "Whatever, we reserve 16 the RGP's position and therefore I don't 17 know, are they going to be formally asked to 18 do a witness statement or if the ..." and Mr 19 Rocca interjects, "Volunteer." Then over the 20 page, "I don't think you should ask, not in the 21 letter anyway, it has to be asked but not 22 asked." "Can I pick up ..." and then you say, 23 "Can I pick up the phone and tell Lewis 24 Baglietto, 'Look, Lewis, I have met with the 25 cm and the team, you can send a witness</p> <p style="text-align: center;">Page 243</p>
<p>1 Q. Was it an agreement that you thought was 2 being to any degree explicitly or implicitly 3 being imposed on the RPG against their real 4 will? 5 A. Well, I think that shows clearly that it 6 was not the case. As I said before, and this is 7 the theme in the three meetings, they were 8 collegiate in nature. 9 Q. Was this a widows and orphans job? 10 Were these senior police officers effectively 11 intimidated into agreeing? 12 A. I don't think that they were people to be 13 intimidated. 14 Q. Can we move to the meeting of 15 May 15 briskly, on the transparency of 16 communications point, can we put up B264, 17 please, about two thirds of the way down the 18 page, the Commissioner of Police asks, "Can 19 we recap," and you say, "Yes, this is how I 20 understand the position. Mark, are you 21 making notes?" That is the Commissioner of 22 Police asking Mr Wyan whether he is making 23 notes, "yes, sir." You, "I will call Lewis 24 Baglietto, okay? Stop me if I am saying 25 something ..." do you agree particularly in</p> <p style="text-align: center;">Page 242</p>	<p>1 statement to the RGP, a statement," and the 2 Commissioner of Police interjects, "That 3 provides them with sufficient data to" you 4 interject, "Seriously, Superintendent, 5 seriously a detailed account." Mr Rocca, "To 6 assess your involvement, they will then 7 postpone the meeting." You then say, "They 8 will then postpone the meeting, the interview 9 on Monday, they will review it ... they may 10 come back to you with a" and it carries on 11 in that vein. Do you agree that you were 12 flagging up explicitly that you were going to 13 communicate to Mr Baglietto the outcome of 14 that meeting and you rehearsed the message 15 that you were going to put to him? 16 A. Absolutely. 17 Q. So we have been to the relaxed 18 conversation already, I will not take you 19 there again, I think we have been there today 20 already on page B236. We have also been to 21 the "we believe on B237, so I will not go 22 there again. Can we put up B238? In the 23 middle your dialogue box, you say, "We 24 think this gives us --- obviously we're going 25 to listen to what you have to say but we think</p> <p style="text-align: center;">Page 244</p>

61 (Pages 241 to 244)

<p>1 that this gives us not a way out but a way in 2 which you can obtain the information that 3 you need to obtain to do your investigation 4 and we are totally supportive of you on the 5 need for that interview, but it will allow you 6 to get that information in a way that you 7 might not otherwise get, certainly not on 8 Monday." Then it goes on a bit and in the 9 bottom line, "If there's an alternative way to 10 do it, where you get" and the 11 Commissioner of Police intercedes, "I think 12 it's not --- I think it's also not in his interests 13 for this to explode, it's not only us," and you 14 say, "I agree, it's not in anybody's interests. 15 The Commissioner of Police says, "I don't 16 want to feel cornered because this is not a 17 question," and Superintendent Richardson 18 says, "I agree, agreed." Mr Rocca, the DPP 19 says, "I agree," and you say, "Absolutely." 20 Did you get any sense in that moment in time 21 that there was anything other than collegiate 22 consensus unobtained by pressure or 23 cajoling? 24 A. That is exactly what I thought it was. 25 Q. If you go over the page, a few pages, at</p> <p style="text-align: center;">Page 245</p>	<p>1 take one or two views, you take the view that 2 either that okay, he's answered all the 3 questions we've got for him or no, it doesn't, 4 we still need to interview him and that 5 interview were to happen after would be 6 under caution." Mr Richardson interjects, 7 "Would be under caution." You say, "Would 8 be under caution." Do you believe at that 9 point that you were resisting the possibility 10 of an interview under caution should the 11 written statement not satisfy the RGP? 12 A. Not at all. 13 Q. Did you feel that the RGP felt obliged to 14 accept this interim measure, this thing that 15 Superintendent Richardson himself described 16 as an interim measure? 17 A. Not at all. 18 Q. Then at B255 at 5647 the DPP requires 19 an explanation from Haime, it requires an 20 explanation from Haime, Mr Levy, and Mr 21 Llamas, "We all agree on that, we all agree, 22 it's just this damned suspect caution thing, 23 now I understand the reason why you've 24 done it, that with Christian and we would 25 have done it --- we wouldn't have done it that</p> <p style="text-align: center;">Page 247</p>
<p>1 241, again at 1933, Mr Rocca says, "If you 2 give a witness statement or a statement, it's 3 cooperative rather than under caution, all that 4 automatically becomes disclosure so that 5 there's a legal discussion." Mr Wyan 6 intercedes, Mr Rocca, "Exactly but it would 7 be part of the disclosure bundle," and the 8 Commissioner of Police says, "That's one 9 option," and then you intercede, "Wait, so 10 one option is a written statement 11 'volunteered' by Mr Levy before Monday, by 12 JL before Monday or by Monday, then what 13 do you do?" and Mr Richardson answers 14 your questions about what you do. Do you 15 think that --- do you recognise that as being 16 you catching up with an option that had been 17 rehearsed in your presence by others? 18 A. I agree. 19 Q. And B242 you say in the middle of the 20 page, "Well, a written statement which he 21 gives to you on Monday doesn't go to the 22 interview, this is instead of the interview," 23 and Mr Richardson says, "It like an interim 24 measure, it's not the end," and you say, 25 "Okay then, you consider it and then you</p> <p style="text-align: center;">Page 246</p>	<p>1 way, and then, Ian, I was starting to like your 2 idea of the written --- you provide further 3 information to him on why you want it." The 4 Commissioner of Police "(Inaudible) 5 somehow or another to engage, get him 6 engaged," and you say, "Okay, so ..." and the 7 Commissioner of Police interjects, "It's in our 8 interest. If it wasn't in our interest, then, 9 look, it's either that or we go [Spanish]," the 10 loose translation means we throw the book at 11 him or whatever, and you say, "Exactly." Is 12 that a fair characterisation of the nature of the 13 conversation and of the collected search for 14 an outcome that ticked the four boxes that 15 you described at the top? 16 A. It is. 17 (16.30) 18 Q. And I am going to now just be a little bit 19 more selective. There are lots of these, but 20 the chairman can see them for himself. So, I 21 am just going to go forward to page 260, just 22 so that we can see that. The second box at 23 the top of the page, you say: 24 "Hold on. Hold on guys, let's carry on. He 25 sends you a statement. You then reply to</p> <p style="text-align: center;">Page 248</p>

62 (Pages 245 to 248)

<p>1 him, 'Saying in view of the statement we 2 shall delay the interview.' 3 Commissioner: "Postpone." 4 DPP: "To consider the matter in your 5 statement." 6 Mr Llamas, you: "Then?" 7 Mr Rocca: "He may be able to obtain 8 documents." 9 "That would be very helpful", interjects the 10 Commissioner. 11 Mr Wyan: "That would be essential, I would 12 say so." 13 The Commissioner: "Yes, supporting 14 documents." 15 Superintendent Richardson: "The file for 36 16 North, the money that they lent them, the 17 investment." 18 You say: "Hold on. Then you consider the 19 statement and then what happens next?" 20 The Commissioner: "We evaluate whether it 21 is, like Paul said, robust enough where we 22 think, 'Okay we are happy with that, he has 23 given us that, he is a witness." 24 Inspector Wyan: "His value as a witness." 25 Superintendent Richardson: "That I would be</p> <p style="text-align: center;">Page 249</p>	<p>1 that have been put to you this morning, 2 Mr Wagner asked you whether or not at 3 meetings why were there no safeguards to 4 ensure that the Chief Minister did not 5 influence the investigation. Do you recall 6 him asking you that? Why he had not -- 7 A. Yes. 8 Q. Were you aware, do you have a view, 9 about whether the Chief Minister was 10 interfering with or influencing the 11 investigation? 12 A. Not at all. 13 Q. Did you have a view that it was? Did you 14 have a view that he was not? 15 A. Not at all. 16 Q. Was there anything for you to safeguard 17 against in your judgment at that time? 18 A. Not at all. 19 Q. And again he put to you a few moments 20 later, as the guardian of the public interest, 21 why did you not try to stop him from 22 interfering ... from influencing the 23 investigation? Same answer? 24 A. Absolutely. 25 Q. So my learned friend Mr Wagner also put</p> <p style="text-align: center;">Page 251</p>
<p>1 happy with." 2 You, Mr Llamas: "Exactly." 3 And then there is all that exchange about this 4 thing that has to go away, meaning, do you 5 think that is a reference to the threats against 6 Mr Richardson, the lines that follow after 7 that about all that other S-H-I-T has to go 8 away? I cannot quite bring myself to 9 pronounce it. Okay. Is that a fair 10 representation of the agreement that had been 11 come to? 12 A. Yes, it is. 13 Q. Freely in your view. 14 A. Indeed. 15 Q. And at page 261, does the Commissioner 16 of Police there describe it: "This is a tactical 17 decision that we take. We consult you. Say 18 yes as a team, as a team, Chris." Do you see 19 that? 20 A. Yes. 21 Q. Does that sound to you like a cajoled, 22 pressurised Commissioner of Police? 23 A. It does not. 24 Q. Okay. All right, thank you, I will move 25 on from that. So going to some of the issues</p> <p style="text-align: center;">Page 250</p>	<p>1 to you when he was asking you about 2 reputational matters whether ... I think this is 3 still Mr Wagner, yes. He put to you that 4 effectively this case, this prosecution, was 5 prevented from going its course. Did you do 6 anything to stop the investigation? 7 A. Nothing at all. 8 Q. So, when the Chief Minister in your 9 presence said what he said to Mr McGrail on 10 12 May, which is described by Mr McGrail 11 and others as the berating meeting, or the 12 meeting at which he was berated, what was 13 your view of what the Chef Minister was 14 doing? 15 A. He was just expressing his views on what 16 had happened in a heated moment of, as it 17 was, as I have described it already. 18 Q. He disagreed strongly with the actions of 19 the RGP? 20 A. Yes, absolutely. 21 Q. He was critical of them. 22 A. Yes, and he gave a list of reasons why. 23 Q. He was criticising the RGP. 24 A. Yes. 25 Q. And in your view is that tantamount to</p> <p style="text-align: center;">Page 252</p>

<p>1 interference in the investigation? 2 A. Not in my view, no. 3 Q. Did Mr McGrail express the view at that 4 meeting that it was? 5 A. No, not that I remember. 6 Q. Did he explain how this might adversely 7 affect the investigation? 8 A. Not that I recall. 9 Q. Did you think that whatever it is that the 10 Chief Minister said, appropriate or otherwise, 11 and we hear a lot about inappropriate 12 language, inappropriate this, inappropriate 13 that, we are supposed to be investigating 14 Mr McGrail's retirement and the reasons that 15 led to it, whatever it is that he said, whatever 16 view may be taken about whether a Chief 17 Minister should or should not speak to 18 a Commissioner of Police like that, did in 19 your view it involve him involving himself in 20 the investigation? 21 A. Not at all. 22 Q. Okay. And what reason would you have 23 had then, as you were asked by my learned 24 friends this morning, to tell him not to 25 interfere in an investigation?</p> <p style="text-align: center;">Page 253</p>	<p>1 A. I don't think it's improper. 2 Q. And does your view alter because the 3 lawyer for the suspect may have had 4 an interest in ... is that a matter for you? 5 A. Not at all. 6 Q. Do you know whether Mr Baglietto was 7 a suspect? 8 A. No, I didn't think so, no. 9 Q. So, regardless of whether you have 10 an obligation to report to them or be 11 transparent and regardless of the extent to 12 which the chairman may take the view that 13 you were transparent at these meetings about 14 contacts or not with Mr Baglietto, in any 15 event your view is that the communications 16 were entirely proper, both as facts and in 17 nature? 18 A. Yes. 19 Q. Were any of those communications, 20 whether they were proper or improper, 21 interference in the investigation of the 22 Operation Delhi investigation? 23 A. No, they were all moments when what 24 was agreed in the meetings was transmitted 25 to them to help the investigation move</p> <p style="text-align: center;">Page 255</p>
<p>1 A. None. 2 Q. Because you did not believe that he was. 3 A. Exactly. 4 Q. Is it your job, do you think, to stop 5 a Chief Minister in your presence from being 6 critical of police action in an investigation? 7 A. No. 8 Q. In your opinion and to this day are you of 9 the view that it is appropriate or 10 inappropriate for you to have communicated 11 in whatever way you did with Mr Baglietto? 12 A. I don't think it was inappropriate and 13 certainly not the type of communication that 14 I was having. 15 Q. Mr Baglietto was the lawyer for 16 a suspect. 17 A. Correct. 18 Q. And do you have a view that lawyers' 19 suspects should not be allowed to 20 communicate with the Attorney General to 21 make complaints about police behaviour in 22 their investigation of them? 23 A. It happens. 24 Q. Do you have a view about whether that is 25 proper or improper?</p> <p style="text-align: center;">Page 254</p>	<p>1 forward on the terms that had been agreed. 2 Or in the case of the meeting of the 20th, to 3 complain about how Hassans had distorted 4 the statements. 5 Q. Yes. In the context of your "don't worry" 6 comment to Mr Levy, apart from what 7 emerges in these meetings that we have 8 discussed already, did you do, suggest or say 9 anything to anyone to protect Mr Levy from 10 the police investigation between April 2020 11 and October 2020? 12 A. Nothing at all. 13 Q. You were asked whether you never 14 considered the legal perspectives of 15 Operation Delhi. What legal perspectives 16 were there that you might have needed to 17 consider? 18 A. I don't know. 19 Q. Was anybody that you could see 20 interfering in the investigation, other than 21 you? You had said you were not yourself. 22 You said the Chief Minister was not. You 23 were not. 24 A. No. 25 Q. Could that be the legal perspective that</p> <p style="text-align: center;">Page 256</p>

<p>1 was being suggested to you?</p> <p>2 A. I don't know.</p> <p>3 Q. So all these things that you omitted to do,</p> <p>4 in questioning by my learned friends earlier</p> <p>5 today, are premised on their case theory</p> <p>6 supposition that there was an obligation for</p> <p>7 you to discharge that you had failed to. That</p> <p>8 was implicit in their questioning.</p> <p>9 A. It was.</p> <p>10 Q. Do you share the view implicit in their</p> <p>11 questions?</p> <p>12 A. Not at all.</p> <p>13 Q. So, just to give you an opportunity to</p> <p>14 make sure that you understood the questions,</p> <p>15 you were asked by my learned friend</p> <p>16 Mr Gibbs whether it was possible for you to</p> <p>17 advise both the Chief Minister and the</p> <p>18 government. Do you remember him asking</p> <p>19 you that?</p> <p>20 A. The Chief Minister and the government,</p> <p>21 yes.</p> <p>22 Q. Yes. What situation was there that</p> <p>23 required you to advise both?</p> <p>24 A. I don't know.</p> <p>25 Q. Sorry?</p> <p style="text-align: center;">Page 257</p>	<p>1 A. The governor?</p> <p>2 Q. The government, sorry, in relation to --</p> <p>3 A. No.</p> <p>4 Q. -- any of these matters.</p> <p>5 A. No.</p> <p>6 Q. So, in your mind how does the question</p> <p>7 of your ability or inability to advise both</p> <p>8 conceivably arise?</p> <p>9 A. I don't, no.</p> <p>10 Q. Now, reverting briefly to the meeting of 7</p> <p>11 April, you will recall that you were asked or</p> <p>12 it was suggested to you that this was private</p> <p>13 advice and that private advice was within the</p> <p>14 definition of interference. Do you remember</p> <p>15 that being put to you?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So, given that private advice,</p> <p>18 according to the questioner, equals</p> <p>19 interference, did you give private advice at</p> <p>20 the meeting of 7 April? You were asked</p> <p>21 whether it was legal advice and you said that</p> <p>22 it was not. But were you giving advice in</p> <p>23 a personal capacity or as Attorney General?</p> <p>24 A. I think it was in my ... from the position</p> <p>25 of being Attorney General, as I said, I think I</p> <p style="text-align: center;">Page 259</p>
<p>1 A. I don't know.</p> <p>2 Q. Was there a dispute between the Chief</p> <p>3 Minister and the government?</p> <p>4 A. No.</p> <p>5 Q. Was there a conflict between their</p> <p>6 interests?</p> <p>7 A. No, not that I was aware of.</p> <p>8 Q. Perhaps we can explore, the suggestion in</p> <p>9 argument is that the Chief Minister was</p> <p>10 heavily conflicted --</p> <p>11 A. Yes.</p> <p>12 Q. -- so that his personal interests in 36</p> <p>13 North through this Astelon company.</p> <p>14 A. Yes.</p> <p>15 Q. Did the Chief Minister seek your advice</p> <p>16 in relation to anything connected with his</p> <p>17 interest in 36 North?</p> <p>18 A. No.</p> <p>19 Q. Did you consider yourself as an adviser</p> <p>20 of the Chief Minister in relation to do</p> <p>21 anything with his private affairs?</p> <p>22 A. No.</p> <p>23 Q. Did the Chief Minister seek your advice?</p> <p>24 A. No.</p> <p>25 Q. Did the government seek your advice?</p> <p style="text-align: center;">Page 258</p>	<p>1 have a more panoramic view of what is</p> <p>2 happening in the jurisdiction and I was just</p> <p>3 giving friendly advice on the basis of that.</p> <p>4 Q. Are you aware of Mr Richardson's</p> <p>5 evidence? Are you familiar with</p> <p>6 Mr Richardson's evidence?</p> <p>7 A. Um, I have heard parts of it and I have</p> <p>8 read parts of it, not --</p> <p>9 Q. Are you aware that he has given evidence</p> <p>10 orally in respect of the meeting of 7 April</p> <p>11 that there was no, nothing on your part, that</p> <p>12 amounted to interference by you in the</p> <p>13 investigation at that meeting?</p> <p>14 A. Now that you have mentioned it again,</p> <p>15 yes.</p> <p>16 Q. Yes. So whether it is private advice or</p> <p>17 not, and regardless of any of my learned</p> <p>18 friends' views about whether private advice</p> <p>19 equals interference, Mr Richardson appears</p> <p>20 not to have thought that it was interference.</p> <p>21 Do you agree?</p> <p>22 A. Yes.</p> <p>23 Q. And could Mr Richardson have</p> <p>24 expressed, given the evidence on oath that in</p> <p>25 his view there had been no interference at the</p> <p style="text-align: center;">Page 260</p>

65 (Pages 257 to 260)

<p>1 meeting on 7 April, if you had tried to 2 prevent them at that meeting from 3 proceeding with a plan to execute a search 4 warrant? 5 A. Not ... it wouldn't be possible. 6 Q. So if at the meeting of 7 April you had 7 sought to dissuade the police from 8 proceeding with plans to execute a search 9 warrant, in that view, in your view, that 10 would have been interference. 11 A. Yes. 12 Q. Mr Richardson did not think that you had 13 interfered. After the meeting on 6 April or 14 during ... I beg your pardon, I am not sure I 15 have been saying 6 April before, 7 April. 16 Did, during or after the meeting of 7 April, 17 Mr McGrail ever complain to you about your 18 behaviour in it? Did he ever characterise 19 your conduct in it as interference or potential 20 interference? Did he have any complaint at 21 all to put to you about whatever transpired at 22 the meeting of 7 April? 23 A. Not at all. On the contrary, the following 24 day he sent an email to the financial secretary 25 asking him the question on ownership, which</p> <p style="text-align: center;">Page 261</p>	<p>1 will correct me, did you receive 2 representations by the defence counsel for 3 the ex-Delhi defendants inviting you to 4 discontinue the prosecution against them? 5 A. Yes. 6 Q. And did you accept or reject that request? 7 A. I rejected all of them. 8 Q. Why? This was your opportunity to 9 protect Mr Sanchez and protect the Chief 10 Minister and protect Mr Levy. Why did you 11 not accept that? 12 THE CHAIRMAN: It was not for protecting 13 Mr Levy at that stage because the 14 proceedings had been discontinued. 15 SIR PETER CARUANA: Already 16 discontinued, thank you, sir. That is 17 chronologically correct. Scratch Mr Levy 18 from that. 19 A. None. 20 Q. And in the meeting of, in the main 21 meetings with Mr McGrail when he raised on 22 several occasions with you the issue of nolle 23 and you have the power, you have the magic 24 wand, you have already alluded to it in your 25 evidence, did you take up Mr McGrail's</p> <p style="text-align: center;">Page 263</p>
<p>1 he described as being a key issue in the 2 investigation and an integral part of what 3 they were doing. 4 Q. So what do you think, what explanation 5 might there be for the orchestration, the 6 mantra that arises now, about the meeting of 7 7 April having been somehow 8 an inappropriate meeting? 9 A. I find it bizarre. 10 Q. Okay. I would just like to spend a few 11 moments with you on nolle related issues, 12 Mr Llamas. So, before the meeting of 13 13 May, before the meeting of 13 May, had 14 there been any discussion between you and 15 Mr McGrail about nolle in the same sentence 16 as Operation Delhi? 17 A. Never. 18 Q. And during the meeting of 13 May, who 19 raised the question of nolle and 20 discontinuance? 21 A. Mr McGrail. 22 Q. Did you receive representations made by 23 defence counsel, you will forgive me if I cite 24 it, it may have been Mr Cooper or his 25 instructing solicitors, I do not remember, he</p> <p style="text-align: center;">Page 262</p>	<p>1 almost taunting invitations for you to enter 2 a nolle at that stage? 3 A. No. 4 Q. To protect them all with one swipe of the 5 pen. You could have protected the Chief 6 Minister. You could have protected 7 Mr Levy. You could have protected my 8 learned friend Mr Cooper's clients. You 9 could have -- 10 A. Exactly. Never. 11 Q. Why did you not? 12 A. Because it was ... it had not crossed my 13 mind that the nolle was relevant here. There 14 was nothing to suggest that the nolle was 15 relevant here and it had just, it started, I 16 mean, as I say in my second witness 17 statement, his comments on the nolle took 18 the DPP and me by surprise. If I may add, in 19 his cross-examination of Mr Rocca the other 20 day, Mr Wagner claimed that each time that 21 Mr McGrail offered the nolle it was in 22 relation to, as a reaction I think he said, to 23 my comments of, "I shall die" and death. But 24 if you look, if we can bring up B, I think it is 25 B118.</p> <p style="text-align: center;">Page 264</p>

66 (Pages 261 to 264)

<p>1 THE CHAIRMAN: I think it is better if you 2 leave the presentation of the argument to -- 3 A. Okay, sorry, sir. 4 THE CHAIRMAN: -- Sir Peter really. 5 A. Okay, so the answer ... yes. 6 SIR PETER CARUANA: Yes, arguments 7 can come in closing. 8 A. Yes. 9 Q. I am just putting to you questions. I give 10 you an opportunity to speak. 11 A. I had -- 12 Q. It was on factual terms, not in argument. 13 A. Not only was he offering me the 14 opportunity, but he said, "I don't care." 15 Q. When eventually you entered a nolle, sir, 16 I am going to be very careful not to stray 17 beyond the question that I put already to 18 Mr Rocca there. 19 THE CHAIRMAN: Yes. This is quite 20 dangerous territory. 21 SIR PETER CARUANA: Yes. When you 22 eventually entered a nolle prosequi in 2022, 23 was that for reasons that had been brought to 24 your attention by somebody else? 25 A. Yes, as I said, the --</p> <p style="text-align: center;">Page 265</p>	<p>1 Q. Confidentially. 2 A. Confidentially. 3 Q. And on the political front -- 4 A. I -- 5 Q. -- did you share it with anybody, your 6 reasons for entering the nolle at that time? 7 A. Yes, I shared it with the leader of the 8 opposition and with Mr Marlene 9 Hassan-Nahon, who was the leader of 10 Together Gibraltar at the time. 11 Q. Who was then the leader of her own party 12 with a seat in the Parliament. 13 A. In Parliament, yes. 14 Q. Separate from the official opposition. 15 A. Yes. 16 Q. And by it I mean the reasons why you 17 had entered the nolle. 18 A. The reasons, yes. Not the actual report. 19 Q. Yes, okay. Okay, thank you. And I will 20 finish before 5, sir. I may have finished 21 already. (Pause). Yes, just one more short 22 point in relation to your role in the removal 23 from office and the circumstances leading to 24 Mr McGrail's retirement. Mr McGrail has 25 said in his written evidence, paragraph 62 of</p> <p style="text-align: center;">Page 267</p>
<p>1 Q. You do not have to tell us what the 2 reasons were. 3 A. Yes. 4 Q. Yes? 5 A. Yes. 6 Q. And was that in Mr Rocca's office? 7 A. Yes. 8 Q. And can you just say whether those 9 reasons affected any of the dramatis 10 personae, any of the people involved, in this 11 inquiry, that had been mentioned in this 12 inquiry, any of the issues that we are 13 investigating, any of the alleged 14 inappropriate behaviour? Does it affect ... 15 were they related to any of that? 16 A. None whatsoever. 17 Q. Well, without saying what the reasons 18 are, did you share your reasons with a group 19 of selected people confidentially? 20 A. Very small group. Including the DPP. 21 Q. Was one of them actually the 22 complainant in the Operation Delhi, 23 Mr Gaggero? 24 A. I had shared my reasons in a short 25 meeting with him.</p> <p style="text-align: center;">Page 266</p>	<p>1 his first, that you discussed his removal with 2 the Chief Minister and Mr Pyle in the period 3 15 to 18 May 2020. Did you? 4 A. That's not true. 5 Q. Did you play any part in the decision 6 making that led to Mr McGrail's premature 7 retirement from his post other than in your 8 capacity as a legal adviser to the governor? 9 A. Only in that capacity. 10 Q. And I suppose I should add, and adding 11 your own expressions. 12 A. And my own letter of 5 June, absolutely. 13 Q. Yes. Did you participate also in the 14 subsequent discussion of retirement terms? 15 A. I think I was involved, I was called into 16 one of the meetings. 17 Q. Do you recall what was being discussed? 18 Was it terms generally or pension terms or 19 maybe -- 20 A. It was financial terms. Whether it was 21 pension or other things, I can't remember. 22 Q. And who was that meeting with? Do you 23 remember? 24 A. It was in the Chief Secretary's office 25 because that would have been a matter for</p> <p style="text-align: center;">Page 268</p>

67 (Pages 265 to 268)

<p>1 the Chief Secretary. And I think Mr Pyle 2 was there and the Chief Minister. It is in the 3 evidence. I just do not remember where it is. 4 Q. And was that in an advisory capacity or 5 a participant capacity? 6 A. No, I was just called in. 7 Q. Okay. 8 SIR PETER CARUANA: Thank you, sir. I 9 think I can leave it there. 10 THE CHAIRMAN: Thank you. 11 MR WAGNER: Sir, I have one final 12 question, and it really will take two minutes, 13 a proper two minutes, if I may. 14 SIR PETER CARUANA: I am not sure you 15 are entitled to (inaudible). 16 THE CHAIRMAN: Carry on. 17 MR WAGNER: Can I just take you, please, 18 Mr Llamas, to page B188. This is the 13 19 May meeting. Just a little bit further down. 20 Do you see where you say: 21 "In my view, just a view, completely unjust, 22 unjustifiable to me, that this man should ever 23 be appearing on a formal document. I will 24 know, if it is knowledge, it is illegitimate." 25 We have seen all that: "I shall fight until I</p> <p style="text-align: center;">Page 269</p>	<p>1 Q. Well, look, Mr Llamas, you say: "I am 2 sure and if it is the case I would ask you to 3 get it out of this as soon as possible." Is not 4 what is happening there that Mr McGrail is 5 not referring to a nolle at all because there is 6 no prosecution, he is referring to the DPP's 7 discretion to not prosecute? 8 A. But this -- 9 Q. And in which case you are saying: "I 10 would ask you to get it out as soon as 11 possible." 12 A. No, that's not my recollection. And if 13 you want to go, since you have raised this 14 issue again -- 15 Q. You raised it, Mr Llamas. 16 A. -- if you go to B118 you can see it there 17 as well, which comes well before this. 18 SIR PETER CARUANA: In fact there is 19 (inaudible). 20 THE CHAIRMAN: I think he mentions it 21 three times. 22 A. Yes. 23 THE CHAIRMAN: But I have the point. 24 We can all look at the transcript. 25 A. Exactly.</p> <p style="text-align: center;">Page 271</p>
<p>1 die." Then the Commissioner of Police says: 2 "The thing is, you have the magic wand here. 3 You have it." Now, is that the bit where you 4 think that he is referring to the nolle? 5 A. That is one of the bits. 6 Q. Now, is it right to say that you can only 7 discontinue a prosecution once it has started? 8 A. Yes. 9 Q. You do not have any power during 10 an investigation, apart from you can take 11 over the investigation, but you do not have 12 a power to discontinue an investigation. Is 13 that right? 14 A. As a matter of common sense, that seems 15 to be the case, yes. 16 Q. However, the DPP does have potentially 17 a role to say, "This is not in the public 18 interest. I am not going to prosecute this." 19 A. Yes, absolutely at that stage. 20 Q. Mr McGrail says there: "The thing is, you 21 have the magic wand here. You have it." 22 Did you think he was talking to you or to the 23 DPP? 24 A. I thought he was ... yes, he is replying to 25 me.</p> <p style="text-align: center;">Page 270</p>	<p>1 MR WAGNER: All right, thank you. 2 MR SANTOS: Very briefly, I am just 3 conscious that the message between the 4 Attorney General and his son has not yet 5 been disclosed and I just want to ... sorry, it 6 has not been disclosed to CPs because it has 7 not been redacted yet. But I just want to 8 clarify ... it has not been disclosed. There is 9 a 14 May ... there are two messages on 14 10 May. The first one is at 12.53 that says: 11 "Ready." That is eight minutes after the 12 message from Mr DeVincenzi referring to 13 Moshe Levy being there. 14 A. Correct. 15 Q. And then there is a subsequent message 16 at 13.08, so that is 23 minutes after the 17 message from Mr DeVincenzi, saying: "On 18 my way." 19 A. I mean, I take your word for it. But those 20 are the messages in question, yes. 21 Q. And you say that it is on the basis of that 22 that you could not have met Mr Baglietto -- 23 A. Well, I am using, in trying to recollect, I 24 am trying to find evidence for a meeting of 25 which I have no recollection. What I have</p> <p style="text-align: center;">Page 272</p>

<p>1 worked out is that the last ... there is 2 a 15-minute gap between the two messages 3 from Mr DeVincenzi. There is this very 4 peculiar situation where he is sending me 5 a WhatsApp when he is 10 metres away from 6 my office, when it would be quicker to knock 7 on my door. I assume that I was not in the 8 office from that. And then there is a message 9 that I sent to my son. What was -- 10 Q. Eight minutes later. 11 A. Eight minutes later. 12 Q. You say: "Ready." 13 A. I think a meeting would have finished by 14 then and then I would have set off from 15 wherever I was to go into the car to send him 16 the second message when I was already 17 sitting in the car. 18 Q. That is 15 minutes later, yes. 19 A. Correct. 20 Q. I mean, it is conceivable that you could 21 have sent the message asking ready in the 22 course of a meeting, but -- 23 A. It's unlikely. 24 Q. -- it is eight minutes after the message 25 from Mr DeVincenzi.</p> <p style="text-align: center;">Page 273</p>	<p>1 Ullger -- 2 THE CHAIRMAN: Looks like a short day 3 to me, but -- 4 MR SANTOS: -- and Field. I would hope 5 so. 6 THE CHAIRMAN: Yes, okay. 7 MR SANTOS: Thank you. 8 (17.02) 9 (Adjourned until Tuesday, 30 April 2024 at 10 10 am)</p> <p style="text-align: center;">Page 275</p>
<p>1 A. It's very unlikely, but it's possible, yes. 2 Q. I just want, in fairness to everybody 3 else -- 4 A. Sure, sure. 5 Q. -- to put that across. Thank you, 6 Mr Llamas. 7 A. I was just trying to look for the best 8 evidence I could find to confirm something 9 that I had no recollection of that it did not 10 happen. 11 Q. It is just because nobody else has seen 12 this messages. I need to make these points. 13 A. I appreciate that, of course. 14 Q. Thank you. 15 A. Of course, of course. 16 MR SANTOS: Thank you. And thank you 17 for -- 18 THE CHAIRMAN: Thank you very much 19 indeed. 20 A. Not at all, a pleasure. 21 (The witness withdrew) 22 THE CHAIRMAN: Tuesday morning. 23 MR SANTOS: Tuesday, yes. 24 THE CHAIRMAN: 10 o'clock. 25 MR SANTOS: Yes, we have Commissioner</p> <p style="text-align: center;">Page 274</p>	

A				
A1301 160:22	86:16 92:8	112:6 121:10	100:5 112:6	253:7 266:14
A256 135:7,14	112:10 114:12	125:13 181:19	118:6,22,24	affidavit 21:8,14
A270 25:14 37:5	115:1 116:11	211:7 235:24	119:10,10,11,12	24:10 135:16,17
130:23	125:7,8,18 127:8	254:6	119:15,16,23	afoot 133:4
A274 63:11	136:2 142:19	actions 216:9	120:6,7,14,17	afternoon 2:21
A275 104:23	177:25 178:10	225:17 243:13	123:24 124:23,25	36:15 94:23
A276 115:18	180:1 185:23	252:18	125:14 127:14	143:13 196:22,23
A288 145:7,9	198:3,10 201:9	activated 42:12	134:16,22 136:1	AG 37:23 38:7
A3 21:7	201:24 204:1	active 131:25	136:4 137:5	39:5 91:22 136:1
A305 91:12	205:12 208:2	acts 105:12	138:11 139:13	138:11
abandon 187:15	209:8 211:8,9	actual 108:16	141:18 168:22	AG's 157:10
abdication 212:4	212:7 221:15	146:11 267:18	169:1,17,18	agency 107:14
ability 96:19	222:23 232:18	add 11:8 91:18	170:5 179:11	116:5
236:16 259:7	247:14 263:6,11	92:16 184:6	185:1,3 202:15	aggrieved 92:4
able 11:2 31:23	acceptance 223:3	264:18 268:10	202:17 203:15	188:12
136:22 193:12	accepted 117:10	added 128:9	205:1 206:25	ago 17:19 65:16
225:5 249:7	221:3	adding 268:10	224:15 258:15,23	202:16
abnormal 99:9	access 236:16	addition 101:14	258:25 259:13,13	agree 11:25 57:7
absolute 149:14	accessed 16:14	228:2	259:17,19,21,22	65:17 71:9,14,21
absolutely 14:25	17:16 87:2	additionally	260:3,16,18	76:23 77:4,6
15:23 17:19 21:6	accompli 27:21	128:24 204:6	advise 41:17 82:24	106:4 107:3
24:6 50:23 54:25	account 19:8 39:4	address 99:5	83:2 164:13	109:8 114:21,24
60:6 62:5,8	62:10 185:8	addressed 12:2	179:5,12 257:17	118:8 126:19
67:11 68:14	244:5	25:3 98:9 204:19	257:23 259:7	127:3 133:5
101:7 112:17	accounts 116:12	209:17	advised 8:4,7 38:7	134:24 137:2,8,9
119:9 120:11	117:2	adds 215:7	40:22,25 41:3	137:15 138:12
132:9 186:21	accurate 3:23	adequate 58:19,24	44:2 117:12	145:17 148:3,7
190:25 199:12	62:10 92:10	212:2	123:14 132:5,19	149:14 151:7,10
209:9 213:5	135:2 241:18	adequately 211:14	133:24 134:9	152:5,12 153:6
214:7,20 215:3	accurately 39:7	211:17	137:13 141:20	154:6,6,13,20
216:19 218:2,6	157:18	Adjourned 51:13	adviser 39:21	160:8 161:13
224:6,22 225:11	accusations 44:17	212:12 275:9	57:18 59:4 72:5	162:1 167:13
230:3,10,13	accusing 140:16	adjournment	131:4 199:5,8	177:2,4,9 199:25
240:21 241:25	achieve 95:6 153:4	92:24 143:9	258:19 268:8	203:16 204:11
243:5 244:16	193:17 224:1	administratively	advisers 48:5	211:18 219:11,18
245:19 251:24	229:19	120:3	advising 14:7 54:8	222:25 225:18
252:20 268:12	achieved 95:5	admitted 117:8	72:6 140:8	228:23 232:8
270:19	229:22	224:16	154:16 203:17	235:10 239:23
absurd 35:7	achieving 153:3	adopted 40:23	211:22	240:1 241:21
127:24	act 12:6 26:21	233:17	advisor 164:12	242:25 243:14
abuse 4:10 96:13	38:15,19 40:24	advance 47:17	advisory 59:21	244:11 245:14,18
96:21 97:7	41:23,25 42:4,12	203:8,10	269:4	245:19 246:18
abusive 232:10	44:24 58:13,18	advantage 20:2	advocate 230:4	247:21,21 260:21
academic 161:4	121:17,21 177:20	adversely 253:6	advocated 230:6	agreed 14:13
accept 11:10 13:15	acted 26:13	advice 8:11 39:7	advocating 153:6	48:11 95:21 99:4
14:20 17:20	acting 53:25 54:1	40:21 42:7,24	153:8 225:15	104:9 112:15
24:23 56:24 60:2	54:3	43:5,9 60:7,12	affairs 200:15	127:8 143:19
61:19,23 62:2,3	action 8:12 36:16	92:24 93:4,25	258:21	145:2 147:14,16
	36:19 85:20	98:17 99:21	affect 193:10	165:6 189:5,6

199:20 206:6 210:24 218:19,22 219:1,16 222:1,7 223:6 230:21 231:4 232:25 236:1 241:19 243:7 245:18 255:24 256:1 agreeing 12:4 104:11 223:1 242:11 agreement 126:21 127:6 175:13 221:7 222:11 232:7 241:24 242:1 250:10 agrees 39:5 152:16 Ah 40:12 ahead 31:6 35:10 48:6 151:6,12 152:4 175:7 196:18 223:18 229:3 aim 153:4 air 150:17 airport 121:15 165:3,5,14 alarmed 109:20,20 alert 29:5 allegation 238:9 allegations 4:10 11:20,23 30:18 35:6 98:14 99:7 99:10 131:6 157:6 158:17,21 185:4 206:23 207:18 223:16 227:6 allege 19:10 44:9 alleged 75:12 266:13 allow 45:4 153:17 224:20 245:5 allowed 130:8,11 254:19 alluded 263:24 alluding 209:3 alter 255:2 alternative 10:3	182:2 245:9 amendment 192:17,21,25 193:17 amount 2:13 amounted 235:25 260:12 amounts 160:7 and-a-half 104:17 and/or 21:15 231:3 anger 134:13 angle 78:12,20 angrier 133:15 angrily 76:24 77:2 77:6 78:5 146:15 146:20 155:1,15 angry 13:19 77:9 77:16 78:23 79:10 81:24 83:19 133:7,9,12 138:5 announcing 243:2 answer 18:14,17 36:7 62:17 73:16 78:21 124:7 140:9,24 148:21 156:11,24,25 177:25 178:18 190:8 193:15 194:9,13,14 203:5 251:23 265:5 answered 155:24 156:1 178:3 193:25 215:22 218:25 247:2 answers 196:18 246:13 anticipating 151:1 anxious 74:13 anybody 85:15 234:4,15,20 256:19 267:5 anybody's 245:14 anyway 80:4 100:1 136:13 243:21 Apache 167:11 apart 26:24	101:23 137:24 165:16 178:4 256:6 270:10 apologies 37:17 121:24 apologise 25:2 65:7 167:21 171:22 apologising 171:17 apparently 138:10 157:7 218:14 appeal 227:11 appear 9:3 20:20 39:24 142:18 148:20 appearance 179:18 appearances 179:19 appeared 28:15,22 63:19 96:24 225:15 appearing 269:23 appears 7:9 49:15 133:6 136:2 137:12,23 192:15 260:19 applicable 161:2 application 214:15 applications 8:6,8 137:15 207:2 227:10 applies 214:12 apply 47:9 174:3 174:19 175:9 214:9 appoint 38:8 43:13 appointed 38:11 57:11 58:7,10,14 59:16 159:4 appointment 57:21 189:9 214:21,21 appreciate 96:2 97:6 274:13 approach 39:6 71:2,10 96:24 152:13 158:6,20 233:17	appropriate 14:9 77:5 78:9,17,24 79:3 82:21 103:15,20 120:13 211:12 253:10 254:9 appropriateness 12:22 99:22 100:6 approval 174:8 April 1:2 24:20 69:11,15,17 74:22 75:1 76:20 104:22 108:7 109:25 110:17,21 111:5,11,23 112:12 117:19,21 124:23 125:19 145:3 168:20,20 171:5 175:14 202:23 203:11,18 205:22 210:3 221:8 223:6 235:3 256:10 259:11,20 260:10 261:1,6,13,15,15 261:16,22 262:7 275:9 areas 192:11 argue 96:18 argument 95:17 97:7 112:13 134:23 258:9 265:2,12 arguments 96:14 215:14 265:6 arisen 39:22 arises 262:6 arising 117:5 arm's 12:9 32:5 armed 121:17 122:1 arrange 48:14 arranging 12:23 arrest 208:11,11 arrested 122:12 arresting 234:10 arrived 97:25 181:17 238:22	arrives 3:17 arriving 206:22 article 28:14,22 aside 91:21 140:25 156:18 asked 9:5,6 10:16 11:19 40:13 70:3 70:11,18,22 71:10,17 78:8 81:16 97:22 106:5 107:11 109:23 114:1 142:17 149:17 163:22 169:3 174:11 176:20 178:2 187:23 192:17 194:7 206:24 208:6 209:15 211:11 213:14,18 214:6 243:17,21,22 251:2 253:23 256:13 257:15 259:11,20 asking 3:13,14 10:19 14:25 23:4 23:17 24:1 29:9 36:8 54:22 73:7 126:11,17 127:23 133:10 138:18 140:1 142:21 144:24 146:11 156:8,11 169:4 171:25 226:14 239:3 240:3,6 241:9 242:22 251:6 252:1 257:18 261:25 273:21 asks 159:3 242:18 aspects 105:10 assault 187:9,19 assembling 86:7 assess 244:6 assessment 187:5 203:14 240:12 assist 159:17 177:17 assistance 127:1
--	---	--	--	---

200:1	161:1 169:17	271:16	219:2 220:21	226:9 228:8
assisting 98:7	170:3 177:16	B124 238:3	227:12 230:24	235:19,21 236:13
assume 25:1	179:4 182:7,24	B131 238:21	232:10,19 233:6	bear 24:7 29:21
134:23 273:7	183:15 184:17	B1365 128:6	244:10	bears 170:20
assumed 19:3	197:24 198:24	B1417 28:12	backed 85:19	becoming 66:5
assuming 22:17	199:2,16,24	132:14	163:9	198:23 199:2
189:13	200:6 212:5	B1418 179:25	background 74:12	200:6
assumption 6:11	214:13,25 222:18	B1419 32:10 35:8	161:5	beg 220:1,19
22:20 138:17	236:22 237:24	129:5	backing 156:6,20	224:12 225:20
Astelon 69:21	254:20 259:23,25	B1420 40:8 48:11	bad 128:23 152:21	226:15 229:9
258:13	272:4	49:6	152:21	261:14
astonishment	Attorney-General	B1436 129:14	bag 227:8	began 51:24 52:3
145:1	18:9 56:7,9	B148 239:14	Baglietto 1:10,11	182:16
astute 205:15	61:13	B153 240:25	2:7,8,9,20,22	beginning 44:20
atmosphere	attributed 95:13	B156 240:2	4:23 5:1,15 7:2,8	141:3 151:8,10
152:21 241:22	authorities 56:18	B164 144:13	7:25 8:6 9:1,6	182:6 221:19
attached 24:16	authority 18:13	B1777 137:18	10:12,22,24 11:7	begins 108:3
38:19	37:24 41:4,6,12	B180 192:7	12:6,9,13 13:2	144:13 150:2
attaches 38:20	43:19 44:25 45:3	B188 269:18	14:4,6,11,13 16:5	behalf 95:22
attack 204:7	61:15 62:1	B197 226:18	86:9,10 89:7,10	107:20
attempt 72:7 78:2	108:15 112:25	B224 225:20,21	89:17,21 90:16	behaviour 235:3
154:3 212:19	128:25 201:1,9	227:12	90:18 91:3,23	254:21 261:18
attempted 99:13	automatically	B228 143:15	92:2,13,18 97:15	266:14
attempts 163:12	246:4	B236 244:20	97:18 98:5 99:22	behold 147:14
attend 9:6 10:16	avail 42:9	B237 244:21	100:3,22 101:6	belief 135:22
16:5	available 19:5	B238 244:22	101:13 102:5,8	230:25
attendance 4:20	42:9 115:22	B242 246:19	103:16 149:1,6,7	believe 8:4,21 9:22
189:17 192:19	aware 12:17 31:9	B255 247:18	149:9,12 185:16	10:10 50:6 67:1
213:13	35:18,18,21	B264 242:16	188:6 189:3,6,23	111:24 133:22,23
attended 39:20	39:12 42:21 46:2	B269 150:1	232:24 238:15,22	188:19 190:4
46:3 76:21 131:2	64:15,17 69:7,8,9	B270 149:25	239:7 240:19	197:21 205:19
175:17	102:1 119:6	B277 152:20	241:2,11 242:24	225:25 226:3,3
attention 17:8	137:21 139:23,24	B3 15:6 203:3,12	243:4,8,10,24	243:13 244:21
24:13 36:10	140:12,17 157:11	B3731 157:3	244:13 254:11,15	247:8 254:2
105:6,19 198:9	160:18 174:13	B5 13:23 15:18	255:6,14 272:22	believed 3:1
265:24	202:23 203:6	B5419 7:17 137:10	Baglietto' 92:7	219:16
Attorney 54:4	214:10 217:17,18	back 2:6 7:7 13:13	balanced 58:4	believing 7:21
56:1,23,25 57:8	233:12,15,20	13:17 18:14,17	154:1	beneficial 23:10
57:12,17 58:24	238:25 251:8	22:12 27:3 35:8	barely 148:14,15	69:23 71:20 72:1
59:3,11 61:21	258:7 260:4,9	49:5 61:9 91:2	188:15,25 189:25	72:19,20 173:6
62:24 74:6 75:12	Azopardi 50:13	111:6,22 116:17	barrister 208:7,8,9	benefit 119:1
75:13 81:2 94:13		117:18 120:5	208:12	203:16
94:15,18 98:24	B	125:16 129:16	base 121:13	berated 76:23
103:25 107:25	b 18:15 19:20 87:8	133:2 134:7,14	based 24:12	252:12
113:24 115:8,14	88:6,19 115:25	138:1 140:13	basis 1:18 34:6	berating 222:9,15
117:23 118:4,19	207:22 264:24	147:18 167:1	52:7 76:19	252:11
120:7 128:25	B1 15:17 16:1	168:9 172:15	115:22 205:20	best 11:25 16:23
131:19 143:22	18:14 86:3	179:17,18 187:7	260:3 272:21	29:16 38:18
153:21 154:14	B109 217:19	190:9 197:4	batting 225:24	109:1 114:6,7
	B118 264:25			

152:17 154:23 161:4 166:19 178:18 190:19 195:3 196:4,8 223:19 274:7 betrayal 144:23 better 65:17,18 212:9 219:23 220:3 265:1 beyond 112:8 125:17 126:21 127:16 128:3 168:24 235:25 265:17 bias 41:6 43:12 biased 38:14 big 101:23 126:19 191:14 226:3 biggest 35:1 191:20 bit 16:11 25:4,10 56:15 57:22 61:10 63:15 71:16 89:8 102:14 103:6 109:15 150:5 169:15 181:14 241:16 245:8 248:18 269:19 270:3 bits 270:5 bizarre 262:9 Bland 64:23 65:4 65:22 68:24 Blands 53:25 54:2 54:3,9 107:15 blocking 166:17 body 143:21 144:2 222:16 bolstered 112:13 book 248:10 Boom 16:11 86:13 border 116:5 Borders 107:13 borne 115:2 187:12 bottom 43:21 98:23 108:3 137:13 147:4	207:23 208:2 217:20,22 219:2 226:18 227:1 239:14 245:9 boundaries 91:24 177:13 box 217:22 221:16 221:17 226:2,25 239:15 244:23 248:22 boxes 239:20,23 240:3 248:14 bravado 165:24 breach 113:8 130:15 break 51:7 212:10 239:5 Brexit 60:19 brief 210:2 briefed 73:1 briefing 64:10 67:3 173:14 briefly 35:4 161:1 196:24 197:1 223:12 240:22 259:10 272:2 bring 44:4,4 196:16 250:8 264:24 brings 59:5 briskly 242:15 British 122:9 Britto 31:7,11,20 34:18 35:25 36:9 129:12 Britto's 128:9 broadly 207:6 broken 147:22 brought 24:12 36:9 105:6,16,19 166:5 170:13 183:12 192:13 198:9 265:23 Brussels 178:15 building 79:12,20 79:22 82:1 176:1 190:5 bull 121:11 bullying 30:18	bundle 9:2 246:7 business 67:10,13 67:19 68:6 businessman 191:21 busy 67:9 <hr/> C <hr/> c 21:1 157:4 C207 165:19 C3 106:1 C3522 4:18 C3953 31:1 C4 107:19 C4106 158:23 C4619 34:19 C4725 37:12 C4727 36:11 C4732 125:8 C4743 40:19 C4757 43:19 C4819 46:11 C4823 48:6 C4826 49:5 C5 22:22 C5871 96:8 C6 13:1 16:17 18:6 22:12 89:7 90:7 C6762 50:11 C6883 2:18 7:6 C6925 218:7 C806 5:6 cabinet 82:4 215:1 Caine 172:6 cajoled 224:9 250:21 cajoling 245:23 call 2:23 3:1,4 4:15 4:15 13:4,5 15:2 25:12 32:17,18 34:1,14,15 42:6 48:14 52:20,24 79:21 80:22 90:8 90:10,10,11,12 90:24 92:3 93:8 101:11 105:7 129:10 189:10,11 190:10 207:6,11 242:23 243:4,8,9 called 3:6,24 4:2	9:9 13:8,9,21 26:7 38:4 52:21 59:17 64:19 79:11,19 81:1,25 89:12 100:15,18 108:8 169:20 170:2 183:24 232:24 238:23 239:10,11 268:15 269:6 calling 15:3 calls 2:24 4:1,3 13:1 79:10 89:15 100:21,23,24 101:3,4,9,22 188:6 cancel 100:16 190:10 cancelled 100:14 capable 235:4 capacity 131:3 169:20,22 170:3 193:12 259:23 268:8,9 269:4,5 car 220:15,21 273:15,17 care 122:23 123:17,21 125:23 195:11 265:14 career 35:3 162:18 careful 61:24 118:3,17 119:6 119:13 120:10,17 123:7,10 265:16 carefully 60:4 75:22 128:18 224:14 carried 44:6 199:6 carries 244:10 carry 150:21 203:24 213:4 248:24 269:16 Caruana 53:21 212:18,24 213:8 213:9 220:1,5,12 226:11,15,23 229:9,13 236:7 236:10 237:12,15 263:15 265:6,21	269:8,14 271:18 case 8:4 18:10 23:8 42:8 56:10 78:1 84:19 95:16 111:20 114:22 119:5 122:21 128:16 133:23 152:8 153:1 160:21 173:18,22 183:9,10 201:11 205:8,13 209:1 209:18,19,21,23 209:23 210:1 230:8 242:6 252:4 256:2 257:5 270:15 271:2,9 cases 105:11 casual 32:15 33:6 catch 13:25 catching 246:16 categorical 132:17 cater 195:20 Cathal 158:24 caught 133:1 cause 29:1 55:7 caution 4:21 149:18 151:7,12 152:5,25 153:9 174:3,16 175:8 204:1 210:14 229:4 231:4 234:11 246:3 247:6,7,8,10,22 cc'd 166:23 CDF 122:14 cent 90:22 173:6 central 57:8 85:2 149:15 152:12 certain 5:16 91:18 105:9 120:18 certainly 4:12 11:6 13:8 15:5 20:11 22:4 31:12 37:7 57:24 58:1 59:10 68:18 69:15 91:6 92:6 99:2,9 103:23 111:20 116:18 132:23
--	---	--	---	--

139:14 148:1,19 159:23 160:21 169:2,10 176:17 181:14 185:3 190:13 227:5 245:7 254:13 cessation 130:25 cetera 160:7,8 Ceuta 28:14,23 Chair 31:7 36:20 38:3,6 chairman 51:9,11 83:5,10,16,23 84:4,7,10,16 102:18 135:11 142:25 143:7 146:8 156:1,10 162:21 168:10,15 170:22 171:1,7 172:1 177:12 178:2 190:22 196:24 197:1 198:13,23 200:20 212:9,14,22 213:3,6 219:23 220:3,10 226:22 229:7,11 235:16 236:5,9 237:10 237:14 240:13,14 240:25 248:20 255:12 263:12 265:1,4,19 269:10,16 271:20 271:23 274:18,22 274:24 275:2,6 challenge 41:5,9 207:6,10,13,14 207:17 209:5 227:21 challengeable 208:15 challenges 200:17 change 152:13 193:6 199:18,18 223:21 changed 134:25 150:11 193:9 changes 200:7 changing 195:6	224:5 channel 43:10 chaps 150:4 characterisation 248:12 characterise 261:18 charge 67:7 81:12 charged 44:7 96:24 228:10 charges 105:17 106:22 109:19 110:2 112:7 116:10 125:15 172:18 206:1 218:21 charging 202:14 202:17 205:1 Charles 46:17 47:5 chart 197:11 chat 6:3 153:11 220:22 228:17 chats 178:16 check 18:20 20:18 62:13,18 87:11 88:23 107:21 134:4 checked 157:5 checking 243:3 Chef 252:13 chief 5:4 8:20,22 9:11 11:15 12:12 12:14,15,22 16:3 16:5,7,24 17:5 18:3,17,24 19:2 19:11,15 20:7,20 22:2,9,12 23:1,4 26:1,14 27:16 28:8 29:17 30:3 30:21 31:2,4,9,19 31:24 32:11,14 33:5 34:22 35:9 36:20 39:21 40:9 40:13 41:1 43:14 43:17 45:17,18 46:12 49:16,19 49:23,25 50:9 62:4 66:5 67:8	67:11,17,23 69:18 70:4,12,19 70:22 71:7,10,22 72:3,10 73:13,18 73:24 74:5 77:22 78:3,5 79:3 82:6 83:18,19 84:1 85:3,9,19 102:2 107:13,14 113:17 114:3 116:4 117:11 122:6 128:8,12,17,20 129:13 130:19 131:3 133:7 134:15 135:4,20 135:22 136:11,15 136:18,22 137:3 138:22 139:3 141:6,23 146:14 146:19 155:2,15 155:16 157:9,11 159:6,13 160:1,9 161:7 162:24 165:19 167:5,8 175:18 177:15 182:23 191:17 192:4,12 193:2 193:16,23 195:23 196:3,7,14 199:5 199:8 213:14,23 216:21,23,25 217:3,6,11,12,14 217:15 218:10 251:4,9 252:8 253:10,16 254:5 256:22 257:17,20 258:2,9,15,20,23 263:9 264:5 268:2,24 269:1,2 China 121:11 Chipolina 197:16 chose 79:21 80:2 124:24 231:15,17 chosen 38:9 Chris 243:13 250:18 Christian 150:4 151:3 153:15 228:18,21 247:24	chronologically 160:16,20 263:17 chronology 40:2 114:17 circumstances 42:8 153:10 163:16 194:25 196:8 216:15 217:7 267:23 cite 262:23 cited 106:3,5,12 citizen 94:12 civil 28:22 58:5 116:3 197:18 claim 28:22 159:2 claimed 264:20 claims 29:1,12 33:12 clarification 1:12 197:3 clarify 22:11 70:10 70:20 91:25 150:14 272:8 clarity 197:17 clear 1:20 6:12 20:14 21:14 23:3 34:7 45:14 67:11 94:19,20,21 101:7 111:10 112:4,8 115:23 119:9 125:12,17 125:19,24 126:21 126:24 127:15 128:3 136:17 137:1 143:19 146:8 147:13 149:12 152:14 165:22 168:22,24 169:10,11 186:25 213:19 217:2 218:3 221:25 222:6 223:5,7 231:12 clear-cut 209:19 clearly 112:14 135:18 196:19 229:21 242:5 client 47:9 clients 264:8	cloak 214:4 close 60:14,20,22 61:2 66:11,24 72:18 176:4 183:4 closely 60:18 closing 265:7 clowns 24:21 166:13 167:20 cm 23:23 38:11 138:4,5 193:6,7 243:25 co- 176:21 coastguard 107:13 116:5 coincidental 79:16 79:18 cold 168:2 180:1 colleague 183:5 colleagues 143:4 collected 248:13 collective 157:20 157:21 collegiate 154:12 163:17 185:12 210:22 242:8 245:21 collegiately 153:20 collision 150:6 159:2 combination 74:19 come 9:5 10:19 26:7,10,10 27:1 41:12 68:20 74:11 75:1 79:23 83:7,13 86:1 104:21 111:19 117:18 124:17 125:7,8,16 137:7 137:16 166:22 189:6 190:2 195:16 218:20 235:16 244:10 250:11 265:7 comes 13:17,22 18:15,17 36:4 39:11 48:16 94:24 111:21 113:5,6 166:18
---	---	--	---	--

271:17 comfort 239:5 comfortable 129:9 167:16,18 coming 10:1 23:14 82:4 92:6 153:12 175:24 184:25 190:6 Commanding 107:17 comment 4:13 9:23 25:3 29:23 30:20 101:17 103:7 127:21 151:19,24 153:15 153:18 159:6 162:19 176:5 177:1 185:11 207:23 211:2 231:1 256:6 comments 146:1 150:3 162:15 264:17,23 Commissioner 8:5 8:7 15:9 25:17 27:2 30:5 33:21 33:24 36:15 38:1 38:5,10,17,24 39:3 42:7 43:7 45:10 46:2 73:20 73:21 77:7 109:23 113:2 117:23 118:20 120:8 125:21 137:14 138:10 140:5 143:23 146:16,21 153:22 155:1,7 158:25 159:8,14,22,24 160:4 164:10,15 169:25 197:22 201:15,17,21 209:2 222:18 242:18,21 244:2 245:11,15 246:8 248:4,7 249:3,10 249:13,20 250:15 250:22 253:18 270:1 274:25	committee 26:9 common 57:17 214:12 270:14 communicate 238:15 244:13 254:20 communicated 128:11 142:16 254:10 communicating 101:6 138:25 239:18 communication 14:10 159:17,19 159:25 254:13 communications 1:9 2:6 10:6 14:17 23:8,22 32:3 33:10 96:15 149:11 192:12 193:5,7,8,13,15 213:22 239:6 240:19 241:2 242:16 255:15,19 community 191:22 companies 68:3,5 company 64:18 65:3,9 66:23 68:4 116:1 157:16,22 258:13 compare 209:21 compared 80:23 complain 256:3 261:17 complainant 266:22 complainants 54:10 complaining 232:21 complaint 238:11 261:20 complaints 41:1,8 254:21 complete 45:14 50:25 completely 7:1 12:11 19:1 22:5 35:7 105:12	113:25 130:3 140:22 147:15 150:7 168:7 183:9 233:1 269:21 completeness 23:20 complexity 120:23 122:20 compromised 236:19 computer 108:11 conceded 237:3 conceivable 273:20 conceivably 259:8 concept 152:23 240:18 concern 17:21 23:23 55:7 87:5 95:9 99:16,17 109:13 119:18,21 120:5 122:16 138:8 145:15 155:23 191:12,13 205:23 217:4 233:16 concerned 12:21 54:6 75:3 92:11 122:19 157:8,13 181:20,23 198:25 199:4 202:6 206:3 concerning 67:17 227:4 concerns 29:4 55:9 55:13,19 93:10 124:4,11 130:13 157:12 158:6 163:23 164:4,7 164:20,24 165:4 165:7,10,14,18 167:2 concession 237:7 237:11 conclude 76:3 151:1 concluded 76:4 conclusion 111:13	111:19 154:23 225:14 concrete 142:22 conduct 216:23,25 217:1,4 261:19 conducted 123:16 confer 234:25 conferred 61:12 confidence 28:11 29:15 30:23 31:9 31:25 43:6 44:13 44:16 45:7 85:4 85:10 113:1,11 113:21,23,24 115:7,15 confidential 191:25 confidentially 266:19 267:1,2 confirm 24:2,5 46:20 47:18 114:23 274:8 confirmation 15:9 confirmed 115:21 135:4 188:20 conflict 54:7 258:5 conflicted 258:10 conflicts 54:14 confused 111:25 112:19 confusion 111:25 116:22 117:5 connected 258:16 connection 22:4,7 126:25 173:23 connections 177:5 conscious 184:9 272:3 consecutive 117:6 consensus 149:20 153:20 195:2 245:22 consent 131:20 consequence 117:15 134:12 consequences 122:18 consider 11:12 12:8 14:9 20:7	23:17 30:19 32:4 33:14 37:25 41:23 43:4 49:3 55:5 60:17 78:9 78:16 102:23 113:9 140:4 155:4 163:3 180:9 183:21 185:21 236:21 238:8,14 246:25 249:4,18 256:17 258:19 consideration 44:25 considered 22:6 39:1 112:6 123:14 125:14 256:14 considering 19:24 94:10 95:13 104:13 219:13 considers 18:10 41:6 56:10 consistently 21:13 constituted 41:4,7 41:21 constitution 18:8 56:2,6,21 57:1,10 57:16 82:11 86:14 166:8,10 199:24 200:23 215:10 constitutional 25:15 57:9,13 164:16 214:17 construe 180:11 construed 74:14 consult 210:21 215:1 250:17 consultation 104:20 consulting 211:4 contact 10:24 26:1 26:4 60:25 61:2 61:3 72:21 89:6 188:1,4 contacted 70:22 106:6 108:16 contacts 14:12
---	---	--	--	---

70:18 92:18 237:4 255:14 contained 11:23 containing 197:19 contains 129:7 contemplating 20:6 contemporaneous 111:16 170:23,25 219:15 content 14:5 15:10 contents 14:3 45:13 85:1 contested 116:7 context 18:20 20:19 24:21 87:15 88:24 125:2 130:12 167:23 168:7 206:19 243:1 256:5 continue 18:11,22 56:13 150:11 153:17 196:18 continued 1:5 143:11 195:17 196:6 continuous 239:22 contract 69:3 116:8 contrary 1:21 19:12 111:14 144:8 147:15 261:23 contrast 236:10 contributed 115:13 contrition 166:7 control 61:14,25 convened 181:8 convenient 142:23 conversation 8:20 17:10 30:7,8 34:3 69:10 88:5 89:2,4 93:14 95:10 97:9 108:24 109:1 112:11 117:24 148:12,16,22	151:22 161:3,8 172:4 180:2,4,5,7 180:10 188:11,25 189:1,12 210:11 244:18 248:13 conversations 50:7 convey 221:3 convicted 76:6 convinced 133:13 133:18 Cooper 262:24 Cooper's 264:8 cooperative 246:3 coordinated 45:24 coordinates 197:19 198:8 coordinating 113:17 CoP 32:17 43:24 44:8 45:2 125:16 CoP's 157:6 copied 23:17 copy 23:19 47:5 106:10 197:21,21 Cornelio 23:16 cornered 245:16 correct 20:21 37:1 41:11 46:1 48:20 53:19 58:8 78:7 87:18 89:20 92:20 102:21 111:6 113:18 114:4,10 134:6 134:24 136:14 138:20 141:13 148:6 150:19 151:3,15,16 155:23 162:8 171:3 174:5 186:5 201:16,18 202:3,12,13 204:9,10 205:4,4 206:18,19 210:9 222:8,9 227:23 228:21 243:2 254:17 263:1,17 272:14 273:19 corrected 132:6 138:16,19 142:13	222:5 226:16 correcting 140:16 correction 132:10 correctly 9:20 10:11 98:1,9 correspond 88:11 correspondence 50:19 91:22 97:8 142:18,19 159:1 corresponding 70:1 87:13,25 88:2 corrupt 171:15 counsel 22:25 23:15 24:17 56:3 59:22 159:3 178:6,7 205:8 240:11 262:23 263:2 couple 33:15 168:16 172:13 208:3 211:10 course 7:15 8:17 16:15 23:10 36:16 47:11 61:22 75:7,16,21 75:22 84:17 94:11 96:18 106:14 107:4 138:21 141:4 146:13 175:8,11 181:19 196:6 211:7 217:10 223:7 235:16,18 252:5 273:22 274:13,15,15 court 38:14 56:12 207:3 227:10 courteous 188:12 courtesy 218:14 cover 133:1 covered 65:2 168:11 CPs 59:21 272:6 create 59:16,24 created 52:6 59:7 122:8,10 181:12 creates 61:20 creating 152:21,22	crime 57:25 75:11 crimes 75:12 76:7 criminal 12:23,24 18:12,23 20:3 54:5 56:11,14 57:1,5,7,13,14,22 58:5,6,20,25 59:9 59:25 60:3,5,11 66:19,22 71:2,4 71:11 73:4 74:11 75:5,15,24 76:3 81:12 93:1,5 94:1 105:1,5,11 108:6,13 121:18 127:11 172:9 180:23 224:14,16 225:5 crisis 97:18,20,20 98:10,18,19,21 98:24 99:1,8,12 103:17,19 206:21 207:16 209:5,11 210:16 critical 76:15 118:16 121:2 122:21 252:21 254:6 criticised 76:24 77:2,7 78:5 146:15,20 155:2 155:15 criticising 252:23 cross-examination 264:19 crossed 192:5 264:12 Crown 24:17 205:7 Cruz 196:21,25 197:2 200:19,22 212:8 CTI 212:25 222:5 228:12 culminates 29:14 current 41:20,23 122:6 217:15 currently 44:24 cursory 131:11 curtail 224:2	curtailed 231:25 236:16 curtailment 44:5 <hr/> D <hr/> D3938 170:19 dagger 214:4 damages 29:1 159:2 160:7 damaging 213:20 damned 247:22 dangerous 265:20 Darren 49:8,13 data 244:3 date 3:1 27:12 170:20 171:9 175:4 dated 47:5 165:20 203:11 dates 35:17 day 3:21 7:3,15 11:1 13:3 16:4 31:7 32:22,24 33:2 36:25 39:19 43:17 46:4 50:1 70:8 84:5,5 86:16 89:16 93:15 95:21 105:19 107:6,7,9 111:8 137:11 162:18 173:15,23 174:7 175:5 177:19 180:2 181:9,11 193:9 210:7 219:21 222:15 227:18 230:16 232:5 236:1 254:8 261:24 264:20 275:2 day's 10:24 day-to-day 200:8 202:4 days 29:22,25 33:15 49:11 61:8 85:12 86:6 88:1 90:15 100:10 104:7 135:21 136:2 138:15 154:25 227:7
---	---	---	--	---

<p>de 28:14</p> <p>de-escalate 209:12</p> <p>deal 11:24,25 92:21 158:18 194:21 210:23 223:19 232:23</p> <p>dealing 26:16 88:16 182:3 223:22 228:2 238:4</p> <p>dealings 128:13</p> <p>dealt 99:18 170:8 171:12 232:9</p> <p>death 103:7 264:23</p> <p>decades 199:10</p> <p>deceased 28:24</p> <p>decent 216:3</p> <p>decide 42:9 60:4 164:10 189:11 236:3</p> <p>decided 14:20 149:17</p> <p>deciding 114:14 114:20</p> <p>decision 24:4,11 35:19 39:1 77:2 78:5 97:11 115:2 234:20 250:17 268:5</p> <p>decisions 25:22 141:2 183:17</p> <p>deep 122:12,12 130:12 160:13</p> <p>deepened 44:16</p> <p>deepens 44:12</p> <p>deeply 44:11</p> <p>default 201:11</p> <p>defence 22:25 23:3 23:9 96:12 97:6 121:20 122:1,7 262:23 263:2</p> <p>defend 223:15</p> <p>defendants 223:18 263:3</p> <p>definitely 71:19,24 173:25</p> <p>definition 120:19 259:14</p>	<p>defuse 157:1 223:9 227:4</p> <p>degree 242:2</p> <p>delay 166:17 249:2</p> <p>delayed 7:12</p> <p>delegate 56:16</p> <p>delegated 200:3</p> <p>Delhi 32:1 53:25 54:10 63:10 64:18 69:19 70:13,19 71:7,24 72:8,22 73:19,25 104:6 158:7 201:20 209:11 255:22 256:15 262:16 266:22</p> <p>deliberations 38:2</p> <p>deliver 76:20</p> <p>delivered 4:14</p> <p>demonstrate 39:3</p> <p>demurred 76:22</p> <p>department 199:6 199:7</p> <p>departments 59:15</p> <p>depending 70:24</p> <p>depends 2:13,14 199:21</p> <p>Deputy 28:9,18,20</p> <p>derail 235:7</p> <p>describe 121:11 200:14 211:21 216:2 218:3 250:16</p> <p>described 69:13 83:4 162:17 181:3,15 194:3 199:19,20 205:15 205:16 206:4 210:10,14 233:16 247:15 248:15 252:10,17 262:1</p> <p>describes 182:4</p> <p>describing 99:2 222:14</p> <p>description 24:23 103:21 112:10 210:5,18</p> <p>descriptions 25:7</p>	<p>210:16</p> <p>deserve 49:10</p> <p>desirable 18:10 56:10</p> <p>detail 29:10 46:7 50:15 64:9 69:25 160:19 172:4</p> <p>detailed 244:5</p> <p>details 168:15 202:10 205:6</p> <p>Detective 197:23</p> <p>detectives 218:12</p> <p>determine 61:18</p> <p>determined 38:17 41:3</p> <p>device 213:23</p> <p>devices 16:21 87:6 96:15 194:5 232:6 234:16,22</p> <p>DeVincenzi 3:20 4:7 5:8,11 6:7 24:18 25:5 110:18 111:3 167:23 168:5 169:12 182:4,13 182:14,20 183:3 189:15,22 190:18 272:12,17 273:3 273:25</p> <p>Devincenzi's 160:24 182:11</p> <p>devised 194:20</p> <p>dialogue 217:22 226:2,25 239:14 239:23 240:2 244:23</p> <p>die 264:23 270:1</p> <p>difference 116:15 126:20</p> <p>different 7:1 59:15 59:18 93:20 116:12 131:7 154:19 167:3 179:3 186:23 193:3 199:25 231:6</p> <p>differential 96:20</p> <p>differently 94:25</p> <p>difficult 88:14</p>	<p>124:18,20 235:22</p> <p>diplomatic 138:1 139:16 200:15</p> <p>direct 72:8 74:16 88:9 119:3</p> <p>direction 61:14,25 105:8</p> <p>directions 237:21</p> <p>directly 47:11 82:9 93:1 159:9,15</p> <p>Director 58:9,17 71:21 153:21 154:15 186:17 228:7 235:20</p> <p>disagree 203:22</p> <p>disagreed 252:18</p> <p>disagreeing 20:20</p> <p>disappear 193:2</p> <p>disappointed 127:10</p> <p>disappointment 147:17</p> <p>disbelieve 205:18 205:21</p> <p>discharge 41:21 42:3 214:18 257:7</p> <p>disciplinary 170:9 171:13 172:9</p> <p>disclose 4:5 6:16 54:24</p> <p>disclosed 9:1 16:16 54:17,22 91:10 189:18 272:5,6,8</p> <p>disclosure 23:8 246:4,7</p> <p>discontinuance 230:8 262:20</p> <p>discontinue 24:4 56:14 180:8 263:4 270:7,12</p> <p>discontinued 263:14,16</p> <p>discontinuing 186:15</p> <p>discover 233:18</p> <p>discovered 122:4</p> <p>discovering 139:1</p>	<p>discretion 271:7</p> <p>discuss 3:18 5:3 7:23 11:25 14:3 14:5 18:4 19:17 20:15 34:16,21 39:22 42:25 51:23 52:2 53:6 53:14 73:19,25 74:6 88:8 99:4 105:9,11 106:17 107:1 108:8 111:11 125:21 143:4</p> <p>discussed 3:4 4:6 5:1 7:14 9:17,24 35:16,24 37:14 37:22 48:22 74:9 97:25 101:10 107:5,6 109:11 110:15,16,22 111:1,5 151:14 151:17 153:13 225:3 232:22 241:5 256:8 268:1,17</p> <p>discussing 14:24 18:24 20:25 27:25 34:17 40:15 48:4 52:9 53:4 78:10,18 80:6,11 104:12 152:16 172:23 208:4</p> <p>discussion 14:19 20:24 33:22 36:14,23 37:10 39:25 40:1 47:4 82:21 100:3 109:18 110:9 111:7 112:3 115:20 125:11 145:12 149:21 150:8,9 171:20 178:20 203:10 239:24 241:23 246:5 262:14 268:14</p> <p>discussions 11:13 20:16 80:13</p>
---	---	---	--	---

86:21 224:24 dismayed 91:23 dismissed 21:17 displayed 165:25 dispose 213:11 dispute 167:9 258:2 disputes 56:22 disquiet 182:5,9 182:16 dissuade 261:7 distant 48:24 distinctly 198:7 distorted 94:10 256:3 DiVincenzi 215:16 DiVincenzi's 215:25 divorce 235:22 doctrine 183:14,20 document 4:19 5:1 5:3 136:20,21 172:15 203:12 204:16 269:23 documentary 124:2 documents 124:3 137:21 140:10 202:24,25 203:17 203:23 249:8,14 doing 14:18 20:6 35:14 62:22,23 95:20,23 97:24 98:7 101:24 118:15 119:5 122:3 161:20 172:16 183:24 184:9 187:21 200:5 218:21 225:8 228:10 243:12 252:14 262:3 door 10:14 176:2 190:2 273:7 doubt 91:20 204:4 downloaded 241:14,19 DPP 3:20 4:7 8:4,7 21:17 22:23,24	24:15 58:13,18 59:7 60:8,12 64:4,6,11 67:4 69:11,13 72:25 92:25 93:4,12,25 99:4,21 100:5,20 104:19,22 105:11 105:15,19 106:5 106:10,12,20 108:8,16 109:12 109:18 110:15 111:7,10 115:21 115:23 116:9 117:12 126:3 132:17,25 133:1 133:2,23 134:5,9 134:17,22 136:1 136:4,16 137:5 137:13 138:11 139:13 140:7 141:7,20 148:15 151:14 153:11 158:19 162:9,14 162:20 174:7 186:25 187:20 188:17,20 200:4 202:24 205:9 224:15,21 225:10 234:25 239:15,23 240:6 245:18 247:18 249:4 264:18 266:20 270:16,23 DPP's 8:11 70:9 71:9 74:25 106:16,25 233:15 271:6 Dr 31:7,11,19 34:18 35:24 129:12 draft 54:19 63:24 128:9 129:13,15 172:18 drafted 1:22 2:1 53:20 107:20 173:19 drafting 59:23 62:14,19 121:17 dragged 106:20	107:2 108:21 dragging 126:9 dramatis 266:9 draw 177:15,17 drawing 182:7 drawn 109:19 dread 144:21 dressing 162:17 due 223:7 duty 42:6 159:10 177:16 215:6 dynamic 153:25 <hr/> E <hr/> earlier 21:16,22 30:6 35:13 86:24 133:20 154:25 257:4 earliest 139:5 early 9:21 47:9 108:7 188:7 early-April 105:4 easier 170:2 190:1 229:19 Eastside 28:25 easy 154:18 effect 19:13 47:22 72:4 133:5 134:21 174:10 180:7 215:24 230:1,7 effectively 13:10 22:2 84:22,24 127:19 229:23 242:10 252:4 effects 132:12 eight 6:13 18:2 90:15 190:17 272:11 273:10,11 273:24 eight-minute 190:19 either 27:8 40:5 67:2 134:12 162:3 172:5 174:20 209:23 213:6 237:11 247:2 248:9 El 28:14 elections 56:22	eleven 105:2 elicit 231:9 elven 105:1 email 4:23 15:7 22:23 24:3,7,15 31:2,3,14 32:15 33:6,8 36:11 41:16 42:18 46:16 47:5,8 48:7 72:15 82:3 92:5 96:9 97:1 98:3 100:14 106:8,9,11,15,16 106:23,24 107:4 108:23 124:10 127:7 131:11 137:18 140:2 141:22 158:24 159:5,12 165:20 166:23 167:1,4 183:10 203:7 261:24 emailed 106:3,20 emails 49:8 55:18 62:13,18 63:6 214:1 emanated 229:25 embarked 27:13 embarrassed 236:18 embodiment 122:9 emerge 91:20 230:19 emerged 8:19 224:23 227:17,25 230:14 231:5 232:11 emerges 256:7 emotion 104:1 emotional 103:8 145:13,18 146:7 146:17,22,24 emotive 34:12 enable 38:25 encapsulated 44:15 encouraged 44:3 encouraging 16:12 86:13	ended 93:10 ends 88:5 218:23 enforcement 118:1 engage 17:10 20:24 29:11 30:1 30:12 88:18 248:5 engaged 32:5 49:2 86:19 205:21 238:1 248:6 engaging 88:16 89:1,3 England 59:21 English 143:16 enjoy 118:9 enjoyed 55:5,5 147:11 enquire 49:13 enquiries 231:10 enquiry 150:14,24 ensure 61:24 66:21 251:4 ensured 189:16 enter 24:8,11 162:3 264:1 entered 76:8 265:15,22 267:17 entering 161:15 267:6 enterprises 67:10 67:13,19 entire 162:18 entirely 44:15 57:25 96:5 151:4 160:2 255:16 entitled 119:8 269:15 entry 170:21 218:8 envisaged 149:11 233:18 equals 259:18 260:19 equivalent 59:20 er 220:25 error 131:18 135:23 222:3 errors 26:8 35:19 39:23 40:4 49:1 50:25
--	---	--	---	---

especially 2:17 200:8 225:2	154:11 159:7 160:24 164:19,23	34:13 35:11 46:13,22 48:12	expecting 123:8	expressive 103:8
essential 150:24 249:11	165:10 168:6 169:9 170:7	49:8 77:9 80:17 81:20 83:6,12,19	experience 57:14 57:23 58:19,25	extended 44:10
established 126:2	174:10 184:18,21	86:16,19 87:8,20	59:6,8 60:3	extent 86:18 92:8 92:14,15 118:14
establishment 200:25	185:25 186:21 187:5 190:14	89:25 90:3 129:20 133:19	121:13,14	202:6 255:11
et 160:7,7	195:8,19 196:2 196:10 204:20	141:23 155:19 250:3	expertise 58:20,25	external 43:4 159:3
EU 121:4 199:7	209:23 215:25	exchanged 80:23	experts 16:13 17:15 87:1	extremely 67:9
European 200:16 200:18,19,21	223:20 225:24	exchanges 2:19	explain 28:4 35:4 44:14 123:20,23	F
evaluate 249:20	226:9 231:9	5:7 16:2 32:11	135:19 168:25	Fabian 29:16 179:10
even-handed 96:23	260:5,6,9,24	35:9 50:20	253:6	face 107:4 187:9 191:11
evening 7:4,5,8 9:14,15 11:3	263:25 267:25	190:15 219:20	explained 53:9 55:4 63:17 65:2	faced 195:1
16:7 18:3 48:17	269:3 272:24	exchanging 31:5 68:22 80:8 86:5	76:16 85:23 94:3	facilitation 210:15
83:16 87:21 92:6	274:8	exclude 26:19 178:25 179:21	95:1 96:6 109:18	facing 99:10
102:17 188:7	evidenced 89:22	193:4	116:21 136:15	fact 21:25 33:14 43:14 44:20,21
event 65:16 142:6 145:24 174:9	evident 203:24	exclusion 56:18	153:16 172:7	44:21 46:16 57:4
255:15	evidential 187:1	exclusively 105:18	184:5 239:8	63:14 70:20 86:8
events 55:2 62:11 76:9 111:17	ex-Delhi 263:3	execute 99:13 110:22 261:3,8	explaining 53:7 101:14 112:17	106:24 139:7
eventually 221:11 221:12,15 222:23	exactly 18:18 34:6 63:1 78:21 80:10	executed 233:13 233:14,21,22	explains 47:14 171:8	140:23 149:22
265:15,22	87:9 95:24 98:24	executing 218:12 233:11 234:5	explains 47:14 171:8	150:1 157:12
everybody 104:15 152:16 158:2	114:19 120:12	execution 93:2 112:16 135:24	explanation 247:19,20 262:4	165:13,15 166:1
167:12 274:2	125:1,1 129:12	206:12 209:4	explicitly 242:2 244:12	171:7 178:4
everyone's 195:14	131:17 132:23	executive 8:12 116:4	explode 245:13	180:25 206:24
evidence 2:25 4:22 4:25 7:9 10:3	136:20 205:10	exercisable 42:1	explore 149:24 258:8	208:18 224:11 271:18
12:12,18 16:23	219:22 225:8	exercise 20:8 21:4 42:22 61:11 78:2	exploring 154:10 180:7	factors 64:16
21:10,24 23:2,5	226:2 227:22,24	114:14,20 115:2	exposure 76:14	facts 115:1 209:18 209:22 255:16
24:18 25:13	232:13 234:1	121:18 184:19	express 93:9 154:2 157:19 234:3,8	209:22 255:16
33:23 34:6 39:23	245:24 246:6	210:23	234:14,19 253:3	factual 1:19 54:17 265:12
51:23,25 52:2,4	248:11 250:2	exercising 20:25 43:1 130:21	expressed 109:12 122:14 128:21,22	fail 166:6,10,11
52:10,16,19,22	254:3 264:10	140:4	129:1 132:10	failed 42:2 177:22 186:19 257:7
53:4,14,15 55:16	271:25	exist 159:19 215:5	165:9,14,18	Failing 166:9
62:9 63:6 70:9	exaggerate 93:13	existed 163:17	260:24	failings 146:5
75:2 91:20 97:10	examination 86:25	existence 65:9	expressing 145:11 148:13,24 252:15	failures 115:24
100:15 102:9	examine 16:21 186:2,7	expectation 204:11	expression 98:21 128:2 136:24	fair 22:1 25:25 26:13 27:7 45:24
103:14 105:14,21	example 19:12 22:15 23:1 30:19	expected 159:8 207:13,14,16	138:23 147:6,8	51:11 57:5 64:14
105:23 107:8	43:5 101:11	210:11	157:17	96:13,19 199:9
110:24 111:9	exasperation 25:9		expressions 167:24 268:11	200:24 202:7
116:14,16,23	Excellency 164:17			203:15 210:17
133:17 139:4,10	excellent 55:6			212:23 240:11
145:6 148:1	excessive 205:25			241:21 248:12
	exchange 5:23 8:18 19:6,19			250:9
	21:21 22:5 30:2			fairly 9:21 207:9
	31:2,3 32:23			

fairness 274:2	fight 269:25	236:2 238:4,11	forgot 22:5	66:24 72:18
fait 27:21	fighting 103:7	241:12 268:1	forgotten 37:11	178:6,6 183:5
fall 180:11 201:20	file 182:5 249:15	272:10	131:15 190:6,8	206:20 210:4
fallen 147:5	filed 28:23	firsthand 121:22	form 55:17 73:15	213:18 215:13
falling 27:2	fill 59:7	firstly 5:18 43:8	240:16	224:11,12 225:23
falls 41:24	final 5:9 8:2 23:11	145:24	formal 44:23	228:13 229:18
familiar 183:19	39:5 40:20 41:18	Fischel 106:9	116:8 178:11	251:25 257:15
184:1 200:23,24	43:20 47:8 50:6	fit 117:2 160:20	238:10 269:23	264:8
208:10 226:24	109:14 138:1	fits 143:3	formally 243:17	friendly 118:24
260:5	166:14 269:11	five 29:8 48:6	116:8 178:11	120:13,15 260:3
familiarity 224:16	finally 23:21 165:2	52:25,25 53:2	formed 134:2	friends 61:4,8
families 28:23	195:21 240:2	86:6 93:23,23	former 107:17	253:24 257:4
fantasy 35:2	Finance 49:23	126:16 150:8	fortune 166:20	friends' 260:18
far 91:2 92:10	financial 23:6	210:7	forward 38:16,18	friendship 176:21
96:22 108:3,4	49:21 261:24	flagging 244:12	44:13 104:12	front 37:16 211:25
181:20,23 199:1	268:20	flavour 23:13	118:18 152:17	267:3
212:21 217:16,18	find 14:1 15:16	flawed 40:19,24	153:14 154:23	frontline 29:3
233:20 241:4	92:23 136:22	flaws 39:13	159:5,12 195:3	FS 23:23
Faro 28:14	146:4 166:1	flight 35:1	210:24 223:10	full 62:10 173:14
fast 155:19	184:20 186:1,6	focus 5:9 9:4 57:8	248:21 256:1	173:14,16 222:12
favour 119:5	189:21 262:9	104:7 105:17	forwarded 28:8	222:13
FCDO 138:2	272:24 274:8	195:12,14	29:18 48:8 49:18	fully 14:23 144:15
140:13	fine 124:24 198:12	focused 57:1	forwarding 28:19	160:17 165:23
FCO 37:13,18	finish 135:11	follow 30:6 184:21	46:12 49:16	237:4
FDCO 137:19	212:17,20 213:2	184:24 250:6	forwards 12:1	function 82:7,13
feature 173:21	267:20	follow-up 3:8	46:22	118:19 200:7
Federation 30:18	finished 69:5	followed 241:24	found 16:20	201:6
feel 27:3 44:14	122:25 267:20	following 28:21	104:13 139:4,6	functions 200:4
45:6 83:21 155:7	273:13	31:7 39:19 46:9	139:10 179:3	214:19
159:14 176:17	firm 191:20	50:1 64:16 74:22	208:22	fundamental
237:23 245:16	firms 67:15	84:4 107:6 159:2	found 68:23	160:5
247:13	first 11:20 13:24	193:9 261:23	four 32:12 85:12	fundamentally
feeling 144:21,23	20:14 21:13	follows 91:25	85:20 110:24	40:24 212:4
144:24 181:15	25:13 30:3 31:15	207:1	111:22 124:17	further 3:12 7:10
feelings 129:2	35:14 36:24 37:6	fools 165:25	126:16 150:13,15	8:2 13:1 15:8
feels 47:9	37:8 58:9 63:12	force 114:15 140:5	210:24 248:14	23:5 32:11 56:15
feet 126:10	69:9 90:5 91:17	201:10	four-and-a-half	61:10 63:16 89:8
felt 34:9 81:23	97:24 100:11	forced 152:18	58:15	104:25 108:5
85:11,15 93:19	101:4 110:14	forcefully 171:14	frame 17:4 29:21	109:16 112:5
118:3 119:5	128:9 132:14	forces 121:17	102:14	125:9,13 128:10
122:13 123:23	133:3,5 135:17	122:1	frankly 122:16	128:24 159:4
128:12 144:19	136:17 150:3	fore 23:14	171:18	166:9 176:6
147:4 154:8	152:6 160:4	Foreign 43:9 48:5	frankness 171:23	177:1 233:7
184:2 195:18	173:14,16 180:12	Forensically	free 154:6,21	239:24 248:2
211:13,16 224:8	192:16 206:25	205:16	231:19 234:11	269:19
225:7 247:13	211:21 217:25	forget 143:22	freely 154:2	future 121:4 224:3
FFS 40:11	219:6,20 226:2	222:17	250:13	231:24
Field 197:8,13	227:14 228:4	forgive 187:24	Friday 1:2 10:9	
198:4 275:4	231:8 232:7	193:14 262:23	46:4 89:23 138:6	
			friend 2:10 60:17	
				G
				Gaggero 107:15

266:23 game 133:4 gap 6:13 59:7 219:13 273:2 GBC 35:14 general 4:16 54:4 56:1,23,25 57:12 57:17 58:24 59:3 59:11 61:21 62:24 74:6 75:13 75:14 77:15 81:2 94:13,15,18 98:24 103:25 107:25 113:24 115:8,14 117:23 118:5,20 120:7 129:1 131:20 143:23 153:21 154:14 161:1 163:2 169:17 170:3 177:16 179:4 182:7,24 184:17 197:24 198:20,24 199:2 199:17 200:6 212:5 214:13 215:1 222:18 236:22 237:24 254:20 259:23,25 272:4 General's 57:9 199:24 generally 2:9 87:15,17 118:9 193:21 268:18 genesis 53:7 gent 5:12 gentleman 5:13 genuine 166:7 genuinely 161:10 190:12 germane 113:4 getting 43:8 126:18 134:22 140:15 153:4,18 195:5 223:20 228:23 Gibbs 168:11,16 168:18 170:24	171:3,10 172:12 173:13 174:17 178:4,19 187:4 189:13 190:7 193:25 196:20 210:4 213:18 215:13 217:8 224:11 229:18 257:16 Gibbs's 224:13 Gibraltar 6:3 37:24 41:12 43:18 47:10 54:6 56:7,22 61:19 75:4 107:18 108:14 112:25 115:25 118:1,10 119:3 121:17,19 122:10 126:15 145:15 157:10,13 157:15,16,18,19 157:20,22 158:1 158:2,3 162:6 166:11,15 167:24 169:24 191:20,21 191:23 196:8 198:25 199:3,13 208:13 214:16,22 267:10 Gibraltar's 75:5 75:14,19,23 76:10 121:4 146:6 199:10 200:12,13 gift 161:18 give 4:13 19:12 20:4 23:4 51:24 52:3 69:14 92:12 101:16 104:2,3 118:21 123:23 142:21 149:18 151:18,24 170:5 178:19 194:11 229:16 230:25 240:4 246:2 257:13 259:19 265:9 given 12:10 14:7 27:1 30:23 32:1	43:5 44:19 50:7 50:19 53:16 78:11,18 110:4 111:12 116:11 123:19 155:10,12 162:17 168:5 176:4 179:2 194:10 198:22,23 201:5 203:21 210:3,16 212:2,3 214:16 220:16 227:6 249:23 259:17 260:9,24 gives 12:12 23:12 140:24 237:22 244:24 245:1 246:21 giving 42:24 53:15 63:2,6 96:1 105:20 118:6 119:1,10,12,23 120:6 169:16,18 183:8 185:3 200:2 211:3 259:22 260:3 glad 217:13 221:25 go 4:18 6:6,10,15 7:17 15:17 16:1 17:23 18:14 21:7 22:22 32:10 34:19 35:8,13 37:5,6,12 40:8 43:20 46:11 48:11,17 49:5,22 50:15 56:15 61:10 63:5,11,15 71:16 80:2 91:1 91:12 96:8,10,22 106:1,8,15 107:19 109:9,16 110:19 115:25 129:16 135:7 149:24 150:1 151:6,12 152:4 153:13 154:18,19 156:4 160:22 166:23 175:7,23 197:4,7,8,14	198:21 206:2,4 210:8 212:22 218:3,7 219:2 220:17 226:18 228:15 229:3 237:19,21 238:3 239:4 241:16 244:21 245:25 246:21 248:9,21 250:4,7 271:13 271:16 273:15 goes 57:19 138:6 201:11 241:20 245:8 going 1:8 4:8 6:6,9 6:15 9:22 10:2 10:12 14:22 16:1 20:23 28:25 29:11 39:15 44:13 45:12 55:22 59:16 61:9 70:7 71:8 78:15 79:13,23 93:11 101:20 106:17 107:9 108:20 110:12 117:18 125:9 135:9 144:10 150:16 151:2,18,23 152:15 158:5,18 168:8 172:10 179:10,23 183:7 190:11 198:21 201:8 205:10 212:18 223:10 227:12 233:6,12 239:1 241:5,7 243:8,9,10,17 244:12,15,24 248:18,21 250:25 252:5 265:16 270:18 Gomez 34:20 36:22 46:18 47:6 48:7,16 good 1:6,7 2:10 7:21 15:1 16:22 51:7,16,17 61:2,3 68:22 129:5	143:13 147:11 166:20,21 196:22 196:23 205:17 206:5,7,10,11 237:22 goodbye 166:19,22 government 11:15 57:19 59:5,12,13 59:14,17 65:6,23 108:12 122:2 126:7,8,12 179:5 179:12 199:6 200:2 257:18,20 258:3,25 259:2 government's 72:5 108:9 126:15 governor 26:2 28:10,18,20 38:12 39:20 42:2 42:22,25 43:15 47:12 113:16 114:2,13,20,24 115:9 128:12,20 131:2 135:15 137:3 139:12,21 140:3,6 142:12 158:6,21 164:2 164:11,13,14,18 201:12 259:1 268:8 Governor's 31:10 47:14 GP 130:21 GPA 31:8 34:9 35:19 36:20,21 36:24 38:4,8,12 39:11,13 40:10 40:14,18 41:20 41:21 42:2,4 43:13 45:7 124:11 128:6,7 131:7,24 136:18 157:4 160:13 granted 7:23 grants 57:4 grateful 199:13 212:24 213:1 great 17:21 greatest 50:23
---	---	---	---	--

Grech 49:9	144:11 145:3	109:14 215:24	holders 159:10	221:16
grounds 7:21 41:5	149:15 150:10	216:2,5 218:10	holding 68:3	impact 150:12
208:22 218:4	156:5,19 188:14	253:11	home 12:14 16:6	163:13
227:9	200:9 210:18	heard 52:12 53:8	166:15	impacts 96:19
groundwork 96:13	222:8,22 252:16	146:25 147:3	honest 62:6 168:5	implausible
group 266:18,20	happening 6:1	169:1,9 174:9	190:7 216:3	198:15
guarantee 226:4	49:3 51:1 68:9	200:20 205:7	honestly 84:2,15	implicated 116:6
Guardia 197:18	73:4 87:6 115:6	229:14 237:7,11	111:24	implication 87:20
guardian 66:18	118:10 119:3	260:7	honoured 49:14	125:6 126:20
72:5 81:3,13	121:5 160:19	hearing 1:17 91:20	hope 23:12 212:19	implications
251:20	177:22 180:14,18	heated 252:16	275:4	102:24 106:19
guess 8:13 59:20	180:20,24 181:5	heavily 258:10	hour 48:15 104:16	implicit 123:5
98:13 107:18	189:21 260:2	held 37:25 65:25	143:3 153:11	257:8,10
guided 224:21	271:4	116:1 124:4	159:5 198:16	implicitly 242:2
gun 196:14 217:10	happens 89:5	178:5 190:9	211:2	importance 60:10
guys 248:24	147:15 249:19	help 104:8 120:16	house 10:12 79:24	119:3 204:24
	254:23	157:1 168:14	huge 29:1,4 160:7	importances 201:5
	happy 104:15	183:7,11 223:9	human 160:5	important 23:2
H	132:1 198:10	255:25		39:2 112:20
Haim 107:15	213:3 249:22	helpful 151:5	I	140:7 185:25
Haime 192:12	250:1	152:2 197:6	Ian 29:9 122:23,23	191:21 229:16
239:19 247:19,20	harm 145:16	198:12 229:1	127:5,7 143:24	imposed 42:4
half 48:15 143:3	Hassan-Nahon	249:9	147:20 150:19	242:3
153:11 159:5	267:9	helping 104:9	156:4,18 167:14	impossible 45:16
162:21 192:8	Hassans 1:9 8:14	163:15 185:5	218:19 222:19	impressed 4:9
halfway 143:17,18	11:13,21 13:17	hesitate 166:4	241:7 248:1	13:10
220:17	14:24 15:22	Hi 28:21 106:16	idea 15:1 149:23	impression 91:21
hand 38:25 180:21	65:25 66:4,8	high 88:3 120:9	152:11,11 153:7	92:12,19 132:24
195:20 225:10	67:4,9,18 68:2	138:9 178:5	163:6 170:13	134:8,11 135:2
handed 46:17 47:4	72:18 73:12	high-profile 75:6	225:2 227:14	157:8 165:22
handled 96:16	95:22 97:25	75:16,17,25	229:5 248:2	181:7
119:20,25 208:9	102:2 104:11	76:11 107:11	ideas 224:23	impromptu 79:15
handling 24:22	116:1 137:10,24	108:17	identified 121:1	improper 180:3
76:25 165:5	141:15 142:3,4	highlighted 16:11	idiots 166:20	213:21 216:9,13
208:8	158:1,17 176:21	16:18 22:25	ignore 124:24	217:4 254:25
hands 127:5	181:11 185:2	25:11	ignored 115:10	255:1,20
hang 83:17	187:10,18 188:1	highlighting 46:15	illegitimate 269:24	improperly 7:22
happen 112:9	188:4 204:8	highly 4:2 181:18	illustrates 166:1	241:14
152:15 168:23	206:22 207:5	190:19 211:5,7	IM 21:16 220:19	impute 229:21
186:22 188:21	232:11,19 256:3	hindsight 81:18,22	imagine 19:22	inability 259:7
205:10 247:5	Hassans' 77:24	82:5 83:6,9,11	62:23 111:13	inaccurate 92:9
274:10	141:12,14 181:24	145:16 211:18	144:17,18	inappropriate
happened 27:23	Hassans's 98:18	history 76:16	iMessages 8:25	160:2 253:11,12
29:10 34:11	99:19 223:16	118:17 122:22	immediate 47:22	253:12 254:10,12
67:14 78:13	hats 179:3 194:2	HMIC 16:8,10	57:24 176:4	262:8 266:14
79:12 80:19,25	head 191:20,22	86:12,20,22 88:5	219:6,11,14,24	inaudible 22:4
81:9,10,21,24	heading 150:6	HO 108:12	220:4,6	80:19 133:1
82:1,6 83:7,13	heads 198:22	Hold 79:5 161:22	immediately 22:14	146:2 150:15
84:20,20,22	hear 52:1 93:18	248:24,24 249:18	33:18 77:19	204:2 210:1
85:16 86:2 103:2			126:6 220:22	
113:22 132:16				

243:12 248:4 269:15 271:19 incarnation 200:1 incident 28:1,24 33:10 121:16 128:15 130:2 163:20 165:3,6 165:15 167:7 include 60:7 160:14 included 23:1 130:8,12 211:22 218:24 includes 62:3 163:1 including 112:16 122:6 266:20 inconsistent 175:13 Incredible 133:4 incumbent 217:12 incur 217:3 incurred 216:9 235:3 independence 61:21 201:6 214:18 215:6 independent 40:21 179:11 183:16 184:19 215:3 independently 97:12 105:13 indicate 17:21 indicated 223:2 indication 23:3 155:11,13 212:25 indications 183:8 indictment 96:25 individual 196:9 individuals 76:6 150:16 inevitable 225:14 infer 139:14 inference 19:18 30:9 influence 20:8 66:22 72:7 154:4 181:16 183:16 251:5	influenced 20:11 115:4 influencing 74:15 251:10,22 inform 218:11 information 6:18 8:23 38:25 53:16 67:6 70:23 115:22 141:6,10 142:7,9 163:21 163:24 174:11 218:13 236:17 245:2,6 248:3 informed 8:11,14 40:18 52:20 64:4 74:21 101:16 116:9 128:25 158:5 159:15 173:22 informing 38:7 144:4,6 ingredients 119:19 initial 40:1 innocent 117:4,7 inputs 131:7 inquiries 218:24 inquiry 5:23 9:2 12:19,20 16:16 31:17 53:9,17,18 54:19 55:17 56:4 62:7,9 63:3 70:23 83:15 91:10 122:16 124:3 164:24 165:11,16 168:3 189:18 202:22 266:11,12 insofar 45:2 157:12 198:24 199:3 202:5 206:3 214:25 inspect 234:16 inspection 232:5 inspections 230:17 Inspector 197:16 249:24 instance 160:4 instances 145:18 instinct 80:22	institute 56:11 instituted 18:13 instructed 36:3 instructing 262:25 integral 262:2 integrity 128:11 128:15 130:13 intelligent 32:8 intensively 60:19 intent 38:22 intention 27:7 31:10 46:19 174:15,18 210:13 interaction 102:8 102:10 202:5 233:10 234:9 interactions 25:24 102:3,6,7 intercede 246:9 intercedes 245:11 246:6 interest 54:7,14 66:15,18 69:24 72:6,9 74:1,16,20 81:3,14 88:10 116:3 157:15,19 157:20 169:24 186:20 230:2 231:14 248:8,8 251:20 255:4 258:17 270:18 interested 168:19 interests 157:21 200:13 245:12,14 258:6,12 interfere 55:22 108:5 164:1 253:25 interfered 44:3 261:13 interference 120:19 253:1 255:21 259:14,19 260:12,19,20,25 261:10,19,20 interfering 74:15 216:6 235:5 251:10,22 256:20 interim 246:23	247:14,16 interject 244:4 interjects 241:10 243:19 244:2 247:6 248:7 249:9 International 199:7 interpret 232:15 interpretation 235:12 interpreted 120:10 221:1 235:4 interpreting 232:19 interrupting 79:8 intersection 200:15 intervene 61:17 155:21 212:6 intervenes 239:4 intervention 37:8 220:14 243:1 interview 4:13,20 9:23 35:14 101:17 132:18 149:18 150:21 151:6,11,19 152:4 153:2,4,14 153:15,18 174:2 174:16 175:8 185:10,11 192:11 192:19 193:12 194:21 203:25 210:14 213:13 229:3 231:1,4 241:15 244:8 245:5 246:22,22 247:4,5,10 interview.' 249:2 interviewed 152:24 153:8 185:18 interviewing 193:4 234:10 intimidated 242:11,13 introduced 152:11 introduction 7:18	introductory 150:3 investigated 67:20 investigating 75:11 153:23,24 202:1 253:13 266:13 investigation 12:24,24 19:25 22:19 24:22 44:5 64:18 65:2 66:22 67:4 71:11,18,18 71:19 72:8 74:2 74:7,9,16,20,23 75:6,15,20,24 76:3,15,17,25 81:5 85:6 87:24 88:1,9 93:6 94:17 96:4,16 105:1,5,10 107:2 108:6,13 118:12 119:19 120:9,24 123:15 138:9 144:7 150:18,25 153:17 154:24 162:7 163:14,15 172:10 177:19 180:24 185:6,23 186:12,18 193:10 195:4,17 196:5 196:17 201:25 202:5 205:14 206:10,10 217:16 223:17,22 230:11 235:5,8 236:18 245:3 251:5,11 251:23 252:6 253:1,7,20,25 254:6,22 255:21 255:22,25 256:10 256:20 260:13 262:2 270:10,11 270:12 investigations 60:5 71:2,5 73:5 82:7 82:14,17 201:19 202:11 Investigative 16:19
--	--	--	--	---

investment 32:2 249:17	issues 25:12 29:1 99:6 104:3,5 105:15 108:10 110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12	217:5 jurisdictional 167:9	82:2,11 86:9 89:19 91:1 106:11 114:5 118:13 119:2 120:15 133:25 135:7 138:24 143:20 144:1 146:23 156:20 157:23 160:10,12 170:7,12 172:8 173:19 174:7 178:23 181:25 183:3 187:23 190:7 195:8 198:13 200:19 205:5 206:11,16 209:17,20 219:3 220:16 222:16 239:9,15,21 243:17 255:6 256:18 257:2,24 258:1 269:24	lasting 113:11 late 102:16 law 56:12 57:7,13 57:14,17 58:20 59:1,9,13,17 60:3 60:11 74:12 117:25 127:11 180:22 191:20 199:7 200:16,18 200:19,21 204:8 214:12 224:14,16 225:5 227:10
investments 68:6	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12	jurisdictions 214:13	183:3 187:23 190:7 195:8 198:13 200:19 205:5 206:11,16 209:17,20 219:3 220:16 222:16 239:9,15,21 243:17 255:6 256:18 257:2,24 258:1 269:24	lawful 243:14
Invitation 47:7	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12	justifications 160:15	190:7 195:8 198:13 200:19 205:5 206:11,16 209:17,20 219:3 220:16 222:16 239:9,15,21 243:17 255:6 256:18 257:2,24 258:1 269:24	lawyer 1:24,25 2:2 11:14,15 51:19 52:11 53:10,24 54:9 59:25 94:17 109:22 112:3 216:3 254:15 255:3
invitations 264:1	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12	justify 112:25 162:19	198:13 200:19 205:5 206:11,16 209:17,20 219:3 220:16 222:16 239:9,15,21 243:17 255:6 256:18 257:2,24 258:1 269:24	109:22 112:3 216:3 254:15 255:3
inviting 161:24	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12	justifying 127:18	204:13,17 217:11 225:5 269:24	157:5
162:1 215:7 263:3	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12		known 34:8 60:16 69:15,17 121:9 142:15 178:22,23	lawyers' 254:18
invoke 27:9	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12		Kram 197:9 198:19	laying 96:12
involve 81:5 253:19	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			lead 24:4 217:5 leader 50:12 267:7 267:9,11
involved 26:6 28:7 43:15 50:22 60:5 64:18 66:23 69:25 71:3,4 82:16 107:16 179:14 180:23 205:8 208:13 209:14,15 266:10 268:15	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			leading 130:25 185:13 267:23
involvement 27:20 50:23 62:11 67:17 68:11,18 85:24 104:25 108:6 128:5 131:9,16 177:18 233:8 244:6	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			leads 184:22 190:3
involves 67:4	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			learn 31:18,22
involving 160:13 253:19	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			learned 206:20 210:4 213:18 215:13 224:11,12 225:23 228:13 229:17 251:25 253:23 257:4,15 260:17 264:8
irrelevant 113:12 113:21,25 134:14 195:15	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			learning 173:18
irrespective 144:8	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			leave 32:7 49:11 117:19 131:6 185:16 198:19 213:7 265:2 269:9
issue 21:14 23:11 23:13 26:6 36:15 36:17 39:22 40:3 57:15 77:12 106:5,22 109:21 116:10 121:5 191:14 194:5,6 195:20 197:9 204:19 205:24 206:21 207:5,6 210:17 223:23 226:3 238:5 262:1 263:22 271:14	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			
issued 208:11	110:13,13 120:22 138:8 150:12 160:5 183:25 250:25 262:11 266:12			

leaves 38:14	44:16,18,20,22	93:15 95:8,11,19	163:16 168:2	200:22 211:20
Leaving 140:25	45:8,13,16,21	96:3 97:8,9	180:1	212:8 213:9
led 9:22 66:25	46:13,14,15,21	99:14 101:16	limb 186:20	222:20 226:8,12
85:21 196:2	46:23 47:21,23	102:4,9,15	limbs 187:21	232:2 235:2
231:23 253:15	51:20 52:6,14	107:15 109:12	limit 163:12	236:21 240:8,12
268:6	53:7,20 54:8,19	110:23 116:2	limited 25:23	241:7,21 247:21
left 68:23 128:13	55:4 92:5 97:24	135:25 144:4,8,9	157:16 228:23	249:6 250:2
150:16 181:18	98:2,8,14,18 99:5	146:25 147:7	line 37:21 38:21	262:12 269:18
200:4 211:6	99:5,11,19	148:4 149:2,5,6	70:9,15 107:10	271:1,15 274:6
221:21	101:15 107:19	149:17 151:18	150:14,23 159:24	Llamas's 220:7
left-hand 70:15	108:14 110:1,5,7	152:13 153:8	172:1 182:7	Lloyd 5:11 183:21
legal 5:21 33:12	110:19 111:16	173:24 174:2,8	229:20 236:17	logical 206:12
39:21 40:21 41:8	112:1,2,23,24,24	174:16 175:8,17	245:9	London 178:14
43:8 48:5 51:24	113:5,6,11	182:3 185:17	lines 43:22 135:19	long 2:10 17:19
52:3 57:18 59:4	114:25 115:5,10	188:9,23 189:23	136:24 159:18	24:20 52:24
72:5 98:16 104:4	115:13,15,16	191:16 193:5,12	177:14,14,17	60:16 72:23 82:3
118:6,21 119:10	116:13,19 124:10	193:16 194:8,11	231:10 250:6	112:10 126:10,11
119:11,15,23	127:18 128:7	194:18 195:6,9	link 28:14 73:12	135:9 166:16
120:7,18 124:25	129:3,13,15,18	203:25 210:13	214:3 231:5	227:13
127:14 131:4	130:5,9 131:4,10	213:22 223:20	linked 111:9	longer 138:22
161:2 164:12	131:21 132:2	225:16,25 226:10	lion's 58:1	212:23 232:15
169:18 170:5	136:17,18,19	228:8 230:2,9,12	list 28:10 38:10	234:21
185:1 199:5,8	137:10,24 141:12	230:23 231:9,13	252:22	longstanding
206:25 208:23	141:14 157:4	232:15 234:10,21	listed 224:1	53:10
209:5 211:12	158:24 181:10,25	235:19,25 246:11	listen 167:21	look 6:6 8:25 12:4
227:9,21 246:5	207:1 228:3	247:20 256:6,9	244:25	14:19 16:10 31:1
256:14,15,25	232:19 239:12,12	263:10,13,17	listened 93:9	36:23 55:21
259:21 268:8	241:8 243:21	264:7 272:13	188:11	73:13 78:22
legally 54:20	268:12	Levy's 10:12 77:18	listening 182:17	118:16 121:5
119:22 186:1	letters 11:24 12:2	78:11 87:4,18	litany 243:11	123:24 125:24
legitimate 215:9	13:12 14:8 36:20	172:25 185:7	litigation 58:20	130:23 131:11
length 12:9 32:5	38:20,23 43:18	189:3 191:9	59:1	132:1 136:19
165:3	104:10 113:18	193:20 224:6	little 8:3 14:21	150:17 156:4,18
lengthy 217:22	114:2 158:17	Lewis 2:9 5:12	26:4,5 61:10	160:1 179:10
leniently 76:12	185:2,5 206:22	15:3,4 92:2 98:4	63:15 71:16	183:6 191:8
lent 249:16	209:16 223:15,16	101:6 238:9,17	74:20 89:8	209:10,17 219:24
let's 35:11 72:24	level 55:3 126:23	238:22 239:19	109:15 248:18	220:3 221:24
79:16 207:11	127:9,11 143:24	241:10 242:23	269:19	223:7 225:20
243:6 248:24	147:20,23 211:13	243:9,23,24	live 12:24 23:5	227:11 243:10,24
letter 1:17 3:8,12	211:16 222:19	lie 28:1 113:6,8	41:2 88:9 166:20	248:9 264:24
3:15,16 7:12,14	Levy 4:12 5:13,15	117:15,17 134:13	194:6	271:1,24 274:7
7:17,24 9:16,24	5:20 6:21,22	134:14,15,19	lives 166:21	looked 4:19,21 6:3
11:21,22 13:11	9:22 10:4 12:14	136:19	Llamas 1:4,6	179:18,24 188:5
13:16,16,22 14:4	16:5 17:12 60:21	lied 85:11 95:7,11	51:16,18 53:11	239:16
14:6 15:12 23:16	60:23,23 66:12	95:12,19 132:20	54:15 62:6 74:12	looking 5:8 10:2
34:8,18,20,21,25	66:14 67:5 69:6	133:14,18,21	103:25 109:7	32:23 33:11 38:8
36:4,22 38:6	70:1 72:19 74:1	134:1	112:21 143:11,25	120:5 160:14
39:11 41:11,17	77:3 78:19 89:7	life 160:6	147:21 168:13	170:20 197:5
42:17 43:20,21	89:18 92:4 93:9	light 36:18 69:13	184:10 197:24	looks 168:3 275:2

loose 218:23 248:10	manage 11:17 14:16,17	22:24 23:13 24:2 24:12 26:17	175:14 184:25 193:9 194:19	184:8 187:3,21 193:8 199:21
lose 28:11 29:15 30:23 231:14	managed 98:20	30:16 32:7 44:24 49:22 60:10	196:13 206:24 209:15 218:9	204:22 209:21 210:21 216:21,22
losing 31:25 85:3	management 28:12 29:5 97:19	102:19,21 105:18 109:24,25 163:19	220:20 221:2 222:19 223:1	218:16 221:10,18 227:25 232:17
loss 31:8 43:6,6 44:13,16 45:7 113:1,21,22,23 115:6	98:22 103:17,20 151:5 152:3 153:1 229:2 231:7	192:6 210:5 224:17 252:2 259:4	239:3 240:7 241:6,8 252:9,10 253:3 261:17 262:15,21 263:21	234:1 236:10,11 264:16 267:16 272:19 273:20
lost 85:10 115:14	managing 97:20 98:11,25 102:7 195:12	maximise 154:10	264:21 267:24 270:20 271:4	meaning 95:25 250:4
lot 12:1 60:25 85:24 86:20 98:22 110:4 111:12 121:19,23 142:11 167:25 178:13 191:23 228:18 229:14 253:11	manifested 55:11 77:11	McGrail 3:3 8:21 11:18 14:14 15:14 17:6 21:21 21:25 28:4 29:9 32:1,22 33:2 46:14,16 49:17 49:21 50:15 55:2 55:8 63:17 75:8 75:10 76:20 77:20,23 78:4,11 78:18,23 79:10 79:12,19,24 80:24 81:1,25 82:4,22 85:4,10 85:21 87:23 97:22 98:1,7 99:3 100:14,17 102:5 103:1 104:17 110:17 111:1 112:15 113:10,12,22 114:15 115:7,15 117:22 118:24 121:8,22 123:14 123:18 124:5,12 124:23 126:24 127:18 130:14 133:18,21 134:15 134:20 135:23 136:3 137:4 139:13,19 141:2 142:12 143:24 145:20 147:10,20 150:10,23,25 154:25 155:11 156:4,8,18 158:5 158:13 161:16 163:18 164:2 167:14 169:8,25	McGrail's 21:10 22:8 24:13 27:8 30:5 33:17 34:16 72:25 76:24 91:17,19 92:19 115:16 121:7 130:25 161:18 163:24 165:5 207:25 208:1 211:2 219:24 220:4,6 253:14 263:25 267:24 268:6	means 18:20 20:19 60:3 87:11 88:24 132:21 144:14,25 248:10 meant 69:23 85:6 94:22 110:1 125:4,23,23 145:1 224:5 measure 246:24 247:14,16 measures 66:21 media 16:7 18:5 36:18 129:22 mediator 11:16 meet 7:2 9:14 10:5 11:8 12:23 16:6 16:23 17:3 29:6 35:11 46:3 48:14 48:16 91:6 98:6 103:16 109:23 118:20 149:1,5 206:25 236:24 240:5,9 meeting 3:2,18,19 3:25 4:3,6 5:14 5:19,20,24 6:21 6:22,23 8:17 9:18,19,20,21 10:25 11:2,4,9 12:13,16 13:5,9 15:13 21:17 22:8 24:20 30:9 31:6 31:18 32:22 33:2 35:16 37:4,25 39:19 40:6,12,14 40:17 46:6,8 47:17 52:15,17 52:18 63:10,15
lots 67:18 248:19	manipulating 163:17 168:1 212:6			
loud 208:2	mantra 262:6			
lower 145:25	map 197:12,20,21 197:22 198:4,8			
luck 68:22	March 22:23 24:8 96:10 97:3 165:21 197:13,25 198:2,5 209:16			
lunch 92:24 143:5	maritime 128:15			
lying 17:6	Mark 242:20			
<hr/> M <hr/>	Marlene 267:8			
M 2:23 7:12,14 9:5 68:21 106:4	material 54:21 88:4 237:19,22 241:14,19			
Madrid 178:15	materially 116:12			
magic 161:21,23 161:23 263:23 270:2,21	mathematics 219:4			
magistrates' 207:2	matter 6:24,25 12:25 15:13 23:18 29:6 32:8 47:11,17 49:4 55:10,20,23 75:18 76:14 78:10,18 84:21 85:1,5 88:6 93:11,13 160:3,5 164:9 173:11 177:8,10 192:4 197:3 205:3 206:14,15 208:5 208:13 210:7 249:4 255:4 268:25 270:14			
main 86:24 107:5 150:15 263:20	matters 2:16 7:1			
maintain 50:10,21				
maintained 91:24				
major 59:10 118:2 125:25 144:6 150:6				
making 8:5,8 35:19 121:23 137:14 139:15 141:2 163:12 183:17 197:25 227:7,9 242:21 242:22 268:6				
man 19:11 32:8 67:8 121:9 171:14 269:22				

63:20,21 64:3,5 64:14 67:3 76:21 77:17 78:4 79:14 85:2,9,15 89:13 90:4 97:15,17 98:4 99:22 100:1 100:2,12,12,16 100:17 101:4,8 101:18 102:24 103:9 104:17,18 104:22 105:18 106:25 110:17,21 110:25 111:1,5 111:23 112:12,19 116:12 117:20,21 118:2 122:24 123:18 125:3 126:6 127:5 131:1,2,14 133:20 135:6,20 136:7,9,16,23 138:4,6 143:14 143:16,20 145:3 147:25 149:3,10 149:12,22,25 150:10 151:9,10 151:14,15 152:16 152:19 153:12 154:3,15 155:14 155:23 156:17,22 158:10 160:24,25 161:11,21 168:21 168:21 169:21 170:3,15 171:4 172:13,15,24 173:13,16 174:1 180:14,17,21,25 181:8,14,21,23 182:15,19 188:8 189:20,20 190:9 190:11,14,19 191:3 198:1,18 203:9 210:15 211:1,3 218:13 219:21 220:23 221:2,20,21 222:1,7,15 225:2 225:12 227:15,18 228:1,4,12	230:15,19,20 232:2,4,8,9,12,25 232:25 233:7 238:25 239:1,10 239:24 240:6,18 241:1,23 242:14 244:7,8,14 252:11,12 253:4 256:2 259:10,20 260:10,13 261:1 261:2,6,13,16,22 262:6,8,12,13,18 263:20 266:25 268:22 269:19 272:24 273:13,22 meetings 12:5 14:13 100:21,22 101:2,22,25 104:9 111:22,24 116:25 117:6 130:18 149:15,20 154:12 168:16,17 168:19 180:13 184:15 187:13,22 188:5 191:10 194:22 223:11 224:8,20,24 230:5,12 232:3 242:7 251:3 255:13,24 256:7 263:21 268:16 member 43:25 members 38:9,12 43:13 121:25 membership 61:18 memory 3:24 64:1 64:2,10 191:5 menace 167:13 mention 49:11 106:21 116:10 124:15 148:11 170:7 188:22 mentioned 24:2 25:1 28:1 37:4 63:14 69:12 108:22 116:18 145:5 167:15 174:1 178:17 260:14 266:11	mentions 271:20 mere 180:25 merely 193:6 message 2:12,14 2:15,19,22 3:6,10 4:14 5:7 6:4,7,9 6:17 7:10 10:17 18:4 19:2 20:14 22:3,9 28:9,19 29:18 30:6,13 37:13,17 48:15 49:7,15,16 72:10 72:13,25 73:14 76:19 78:15 79:9 81:23 82:19 87:15 89:22 94:19 117:11 124:8 132:16 137:8 175:19 176:7,10,13 190:3,18,23 191:2,5 244:14 272:3,12,15,17 273:8,16,21,24 messages 4:16 5:11 7:7 17:24 32:13 55:17 62:13,19 68:22 77:20 86:5,8 130:18 132:14 140:18,21,23 141:1 179:24 189:19,25 191:6 191:15,19,24 192:3 193:19,23 194:1 214:3 272:9,20 273:2 274:12 messaging 6:14 90:2 Messrs 23:15 met 6:25 7:11 9:15 10:21 11:6 77:22 77:23 87:23 89:19,21 91:3,5 99:25 112:9 136:10,12 187:2 221:25 243:24 272:22	method 122:17 metres 189:25 273:5 Michael 1:4 21:24 106:16 127:6 143:11,24 147:20 162:10 183:7 222:19 microphone 215:15 midday 40:12 47:19 middle 94:16 238:21 244:23 246:19 midnight 17:25 18:1,1 Mike 122:15 miles 177:6 198:7 mind 17:5 24:7 27:11,16 29:21 29:22 102:14,18 102:20 105:16 125:19 146:1,3 160:11 177:11 192:5 194:1,4,17 223:6 237:18 259:6 264:13 minded 42:22 mine 2:10 181:7 182:11 207:25 235:23 minimise 225:17 240:23 minimum 125:24 minister 5:4 8:20 8:22 9:11 11:15 12:12,16,22 16:3 16:7,25 17:5 18:4,18,24 19:3 19:15 20:7 22:2 22:10,13 23:4 26:2,14 28:8 29:17 30:4 31:2 31:4,10,19 32:12 32:14 33:5 34:22 35:9 36:21 40:10 41:2 43:14,18 46:12 49:16,19	49:23,24,25 50:9 62:4 66:5 67:8 67:12,17,24 69:18 70:4,12,19 70:22 71:7,10,23 72:3,11 73:13,18 73:24 74:5 77:23 78:3,5 79:4 82:6 83:18 84:1 85:3 85:9,19 102:2 107:14 113:17 114:3 117:11 128:9,12,17,20 129:13 130:19 131:3 133:7 134:15 135:4,21 135:22 136:11,15 137:3 138:22 139:3 141:7,23 146:14,19 155:2 155:15,16 157:9 157:11 159:6,13 160:1,9 161:7 162:24 165:19 167:8 175:18 177:15 182:23 191:17 192:4,13 193:2,16,24 195:23 196:4,7 196:15 213:14,23 215:1 216:21,24 216:25 217:3,6 217:12,13,15,15 218:10 251:4,9 252:8,13 253:10 253:17 254:5 256:22 257:17,20 258:3,9,15,20,23 263:10 264:6 268:2 269:2 Minister's 12:14 16:6 19:11 20:21 23:1 27:16 31:24 39:21 45:17,18 136:18,22 167:5 ministers 122:2 215:2 Ministry 121:20 122:1
---	--	--	--	---

Minster 30:22 40:14	38:22 68:12 73:8 74:21 75:2 76:15	242:14 250:24 255:25	Needless 208:21	64:21 65:3 66:1
minute 68:20 219:8,17	79:25 81:22,22 84:23 87:5	multiple 130:18	needs 117:2 239:4	67:25 68:11,23
minutes 6:13 17:25 18:1,2	114:13,19 117:19 118:17,25 119:4	N	negotiation 210:16	69:19,24 71:21
32:16 52:25 53:2	121:2 122:22		negotiations	72:1,19,20 73:8
93:24 143:2	166:17 168:9		101:24 121:3	78:12,20 116:2
190:17 269:12,13	181:9 195:3,19	name 130:8,11	negotiator 11:16	173:1,7,23
272:11,16 273:10	197:14 198:20	131:19 132:1	Neish 35:25 36:1,2	193:20,24 213:23
273:11,18,24	200:3 233:4	narrative 157:6	47:6	249:16 258:13,17
mischaracterisa...	245:20 252:16	national 115:24	neither 41:20	not?' 208:6
117:14,16 134:18	moments 90:23	146:6	nervousness 192:1	notably 99:19
misfeasance 4:10	163:5 251:19	nature 11:20	never 19:7 22:7	note 47:8 64:6
223:23 238:10	255:23 262:11	32:15 33:6 117:6	70:3 74:8,9	107:10 170:15,19
mishandling 138:8	Monarch 166:12	148:23 161:4	184:13 186:9	170:23,25 172:2
misinterpretation	Monday 46:9,9	167:3 185:2	195:6 217:18	172:12 173:20
44:2	47:18,22 101:17	191:25 242:8	222:22 223:20	noted 96:22
misleading 109:3	151:19 185:10	248:12 255:17	237:18 256:13	notes 40:5 55:23
109:6 125:18	241:15 244:9	nautical 198:7	262:17 264:10	101:1,21,25
134:7,8,11	245:8 246:11,12	NDM 202:14,18	nevertheless 14:9	102:2,11,12
220:10	246:12,21	202:19,21 203:13	26:1	173:17 242:21,23
misled 136:25	money 249:16	204:6,12 205:1	new 38:8,12 43:13	243:6
misrepresent	months 29:7 86:23	near 205:24	59:17 79:24	notification
106:7	105:2,3 108:7	nearby 176:1	142:19 234:5	192:18
misrepresentation	126:17 185:24	nearly 162:22	newly 41:20	notified 72:24
114:25 142:15	months' 208:3	neater 187:6	news 40:10	notify 45:6
missed 2:24 4:1,3	mooted 240:20	necessarily 44:12	Nick 35:12 36:12	notwithstanding
13:1,5 89:15	moratorium	64:24 67:15 68:9	37:18 48:13 49:7	17:14 34:10
90:10,11 188:6	227:18 230:16	167:6 182:11	night 3:9 83:22	NSCIS 64:23 65:5
mistake 112:18,19	232:5 236:1	necessary 19:9	94:6 99:20	65:21 68:19 69:2
112:20 117:4,5,7	morning 1:6,7	45:6 67:1 132:19	111:13	116:7 146:5
132:6 133:6	7:13 18:2 20:23	195:18 220:8	nine 138:15	null 38:3
137:16 138:13,16	38:6 51:16,17,18	228:16	213:12,15	number 23:6
138:19,20 139:16	86:4 97:22	need 18:19 20:18	nolle 21:15 22:1,3	98:22 132:12
139:22 140:7	130:17 155:18,25	36:17 37:6 60:3	23:25 24:7,8,11	145:8 172:17
mistaken 53:16	160:17 165:4	67:5 87:11 88:23	76:8 161:3,15,17	177:13 191:9
mistakes 139:25	167:22 239:8	128:18 140:10	161:19 162:2,3	206:1 220:16
misunderstanding	251:1 253:24	142:5 148:22	163:1,3,7,12	223:14 228:14
212:15 221:4,5	274:22	157:11 160:10	229:23 230:7	numbers 226:24
222:24 223:4,8	Mosche 149:1,6	166:6 175:9	262:11,15,19	numerous 67:10
Mm 222:20	Moshe 5:13,15,20	179:11 183:15	263:22 264:2,13	
MOD 122:8,8	6:21,22 89:17	184:2 191:8	264:14,17,21	O
165:23 167:10	272:13	212:22 214:22	265:15,22 267:6	o'clock 90:9 94:23
mode 103:17	motivated 145:14	216:16 238:7,8	267:17 270:4	135:8 212:20
model 202:14,18	216:12	238:15 239:18	271:5	274:24
Mole 79:24	motives 214:4	245:3,5 247:4	non- 229:23	oath 24:2,5 166:13
moment 19:25	216:13	274:12	non-exercise 20:9	216:5 260:24
22:20 27:14	move 118:18	needed 98:20	nonsense 165:24	objections 162:11
		172:18 181:17	normal 103:24	objective 223:25
		185:4 206:21	181:1 209:5	objectives 229:19
		224:13 225:9	North 32:2 64:19	obligation 214:18
		256:16		237:24 255:10

257:6	94:24 159:10	Op 53:25 54:10	outcome 40:16	169:23 260:1
obligations 164:17	161:6 175:25	63:10 64:18	72:9 112:3	papers 47:16
obligatory 236:22	189:2,25 195:23	69:19 70:12,19	125:11 151:1	para 21:11
obliged 247:13	196:3,7,10	71:7,23 72:7,21	153:19 240:23	paragraph 7:19
oblivious 140:22	200:10 216:20	73:19,25 104:6	241:1 244:13	13:24 21:8,9
observe 55:21	266:6 267:23	OPCL 59:20	248:14	23:11 25:19
obtain 109:21	268:24 273:6,8	open 44:1 185:7,8	outline 7:20	38:21 40:20
110:22 195:18	officeholder	235:11	outlined 135:22	42:15 43:22
245:2,3 249:7	196:11	opening 219:20	outrageously 44:8	44:22 45:11
obtained 43:5	officer 107:13,17	225:13 226:17	over-expressive	63:11,16 64:10
obtaining 234:5	116:5 153:23,24	openly 10:23	145:13	64:25 73:2 91:13
obvious 30:10	202:1	operating 127:9	overreaction	91:16 92:8 97:14
43:12 79:23	officers 29:3	Operation 32:1	160:9	104:23,24 105:3
123:25 124:1,21	180:22,23 204:15	158:7 167:10	overriding 87:4	108:3 109:3,6,15
132:3 147:19	206:5,5,7,11	201:20 209:10	owed 49:12	109:17 112:14
159:25 184:23	242:10	255:22 256:15	owner 72:20	115:18 123:6,11
obviously 27:13	offices 59:13,18,19	262:16 266:22	ownership 23:10	123:13 125:10
28:25 37:10	77:18,24 178:5	operational	71:20 72:1	130:23 135:14
87:12 106:23	official 267:14	201:14 205:2	105:17 106:22	145:9 160:23
111:8 136:5	officials 116:24	opinion 223:12	108:10,25 110:1	166:14 197:8,10
190:20,22 212:7	121:20 122:5,11	254:8	116:6,10 126:1,5	203:13 211:21
239:9 244:24	126:7,23 154:1	opportunity 104:3	126:9,16 173:7	219:19 227:4,5
occasion 105:7	oh 89:24	123:20 200:17	176:21 261:25	241:13 267:25
occasions 177:13	okay 35:15 40:13	229:16 237:22		paragraphs 41:18
237:17 263:22	70:17 129:24	240:4 257:13	P	92:22 110:14
occur 184:10,16	135:13 150:4	263:8 265:10,14	P 53:21	112:1,11 197:14
186:5,10	198:19 199:23	opposite 85:18	PA 3:6 6:1 9:9,9	197:15
occurred 113:9	201:8 202:4	95:25 111:20	190:10,10 239:11	parallel 172:8
130:16 186:9	213:6 219:2	opposition 50:12	page 8:2 16:4,9,15	paraphrasing
October 234:21	221:13,22 223:11	267:8,14	16:16 21:18	25:19
256:11	228:17,20 240:5	oppressive 153:5	23:12,21 28:17	pardon 220:2,19
odd 30:21 180:13	242:24 246:25	option 21:25 246:9	28:21 34:19 40:9	224:13 225:21
180:15,18,20,24	247:2 248:6	246:10,16	43:20 47:2 70:8	226:15 229:10
189:21	249:22 250:9,24	options 48:17	86:12 89:8	261:14
offenders' 16:21	253:22 259:17	153:13 185:7	107:10 110:19	Parliament 56:23
offer 22:8 48:10	262:10 265:3,5	233:19 234:2	129:17 143:18	61:19 166:12
161:19	267:19,19 269:7	oral 116:14,16	145:8 192:8	267:12,13
offered 49:10	275:6	225:13 226:16	217:20 219:3	Parliamentary
161:17 200:17	old 112:24	orally 260:10	220:17,19 225:22	59:22
232:17 233:2	omitted 18:5	orchestration	226:24 228:14,19	part 12:1 14:15
264:21	131:13 257:3	262:5	238:6,20,21	16:18 25:21
offering 162:2	once 91:4,7 166:5	order 54:18	239:14 242:18	26:19 28:7 63:24
265:13	195:22 270:7	original 187:15	243:20 244:20	87:7 102:16
office 2:4,5 6:2	one-sided 34:2	Originally 239:1	245:25 246:20	111:4 116:24
7:11 9:6,7 10:14	one-way 188:10	originate 224:25	248:21,23 250:15	145:6,12 150:17
10:16 43:9 46:3	ones 224:1	originates 149:23	269:18	157:5 158:1,2
48:5 56:7,8 58:3	ongoing 70:23	orphans 242:9	pages 21:11 48:6	172:5 177:16
59:17,21,22	108:10	other's 114:2	210:7 245:25	187:1 246:7
83:19 89:18,21	onwards 237:5	ought 159:25	paid 49:12 65:23	260:11 262:2
			panoramic 118:9	

<p>268:5 participant 269:5 participants 110:24 participate 268:13 participated 194:23 participation 25:23 130:24 131:12,24 particular 14:19 17:1,7 20:24 27:12 28:2 29:6 30:17 54:2 71:19 71:24 77:11 98:15 101:13 117:3 121:21 225:2 particularly 4:8 17:9,13 25:8 49:2 54:13 60:22 118:16 121:2 130:20 174:23 242:25 partner 66:8 67:14 72:18 partners 66:23 68:3,7,8 partnership 176:22 parts 21:20 128:8 260:7,8 party 267:11 passed 4:17 8:22 141:6 passing 74:24 121:6 140:21 path 184:12,14,24 215:19,23 216:18 Paul 3:16 197:16 197:23 241:5 249:21 pause 97:14,16 103:13,14 217:24 267:21 pausing 157:15 pay 17:7 payasos 24:21 payment 160:6</p>	<p>peculiar 273:4 pen 264:5 pension 268:18,21 penultimate 43:21 109:17 people 75:6,16,17 75:25 76:11 106:19 107:1,12 108:17,20 122:3 142:2 157:17 166:16 168:1 199:13 201:22,24 205:5 206:11 212:3 238:1 242:12 266:10,19 peradventure 112:8 125:17 126:22 127:16 128:3 168:24 perceived 38:13 perception 43:11 Perez 23:15 107:16 perfectly 119:8 154:21 perform 41:21 42:3 period 44:10 74:24 91:9 230:17 268:2 periphery 50:25 permission 15:1 permitted 53:13 person 10:5 18:13 44:7 61:15,25 66:15 67:6 74:1 81:12 116:2 141:17 142:14 169:22 183:22 193:8 222:25 personae 266:10 personal 2:15 6:17 12:10 16:21 32:2 55:3 66:11 88:10 143:24 147:17,20 147:23 222:19 258:12 259:23 personally 60:14 60:20 179:7,14</p>	<p>persons 56:18 116:24 117:25 181:1 perspective 75:13 104:4 106:25 154:14 256:25 perspectives 256:14,15 persuade 231:14 persuasion 187:14 Peter 212:14,18,24 213:8,9 220:1,5 220:12 226:11,15 226:23 229:9,13 236:7,10 237:12 237:15 263:15 265:4,6,21 269:8 269:14 271:18 petty 166:21 phases 178:12,12 phone 16:13 17:16 80:1 87:2 243:23 phones 16:22 191:14 192:2 phrase 144:25 Picardo 60:15 66:3,7,10,21 68:10,21 69:1 72:17 74:13 76:24 78:17 79:18 81:4 86:6 86:7 87:9,22 88:8 102:4,25 129:6 132:15 133:3 136:3 142:4,5 165:20 165:21 180:6 195:25 196:3 236:13,19 Picardo's 165:17 176:3 pick 6:6,10,15 108:2 121:15 182:8 191:2 243:22,23 picked 144:16 222:5 227:5 picking 18:8 43:22 picture 50:1,4 73:9</p>	<p>88:22 89:10 pieces 121:15 Pierre 6:2 190:16 place 5:14 39:25 64:5 66:20 67:5 77:17,19 79:15 90:8 100:13 102:3 111:23 145:23 166:19 181:1 189:20,24 222:11 places 141:11 plainly 203:23 plan 174:2,3 184:17 203:24 204:10 205:9 206:11,13 209:4 209:4 212:2 261:3 plane 166:18 plank 85:2 planned 233:22,24 233:25 planning 46:8 plans 261:8 platform 64:23 65:5 68:19 108:11 116:7 play 268:5 playing 12:3 PLC 157:10,14 158:1,3 please 1:10,14 2:18 4:18 5:6 7:6 15:17 21:7 22:22 31:1 32:10 35:8 37:12 40:8 41:14 47:1,18 50:11 56:1 63:11 88:10 89:7 91:12 96:8 104:23 106:1 110:20 115:18 128:6 143:15 157:3 158:23 160:22 170:19 182:1 192:7 194:16 217:19 221:14 241:16 242:17 269:17</p>	<p>pleased 224:4 pleasure 274:20 plotted 197:12,20 point 4:21 15:21 18:25 22:11 24:19 30:13 31:11 32:20 38:8 43:12 68:21 73:11 74:13 81:2 85:11,14 96:10 104:1 128:16 131:17 133:25 137:1 140:19 156:15 178:20 197:3 213:12,15 228:22 233:5 241:13 242:16 247:9 267:22 271:23 pointed 227:14 pointing 158:9 points 29:8 124:15 124:19 146:12 213:10 274:12 police 3:20 4:7,20 25:17 27:2 30:5 33:21,25 36:16 37:24 38:1,5,15 38:19 40:23 41:12,25 42:4,12 43:19 44:24 45:10 46:3 67:21 73:20,21 75:11 77:7 82:7,9,13,16 83:20 108:14 109:23 112:25 113:2 117:24 118:21 120:9 125:21 143:23 146:16,21 153:23 154:13,18 155:1 155:7 158:25 159:8,14 162:6 164:10,15 169:25 180:23 184:15,16 184:23 185:18,21 185:22 186:3,6 187:25 188:22 195:17 201:1,9</p>
---	---	---	--	--

201:10,15,17,21 203:18 204:15 205:6 209:2 213:25,25 214:6 222:18 224:8 233:21 236:23 242:10,18,22 244:2 245:11,15 246:8 248:4,7 250:16,22 253:18 254:6,21 256:10 261:7 270:1 Police' 47:10 police's 236:16 policing 55:10,19 55:22 121:7,12 122:17,22 Polie 41:22 polite 188:13 political 29:2 119:16,17 214:21 267:3 politically 120:1,2 120:2 politician 183:16 214:14 Politics 50:18 Pop 189:14 popped 10:15 position 24:11 32:5 38:1 41:19 42:11,13,20 45:13 46:21 47:20 50:21 53:19 94:21 108:9 111:19 122:13 126:15 132:9,24 134:25 136:14 139:2 142:13 165:24 184:5 225:16 235:23 242:20 243:11,16 259:24 positions 113:20 177:6 possibilities 153:16 possibility 26:19 117:1 153:3	161:14 224:3 231:13 238:16 240:18 247:9 possible 44:1 70:8 92:1 231:6 232:23 257:16 261:5 271:3,11 274:1 possibly 3:25 27:5 33:13 91:4,8 160:14 post 57:20 59:5,25 127:20 131:19 268:7 postpone 244:7,8 249:3 potential 54:7 118:11 160:6 261:19 potentially 22:18 66:15 108:20 116:2 208:4 270:16 power 4:11 18:9 19:4 20:9 21:1,5 22:18 42:5,5,8,22 56:9 57:13 61:17 82:16 153:25 180:8 186:11 263:23 270:9,12 powers 42:1 43:1 56:16,17,20,24 57:4 61:12 114:15,21 115:3 140:4 162:25 231:24 practice 16:22 58:1 preceded 192:14 preceding 47:2 precise 172:25 precisely 55:4 80:20 237:18 predecessor 57:24 predecessors 57:22 58:4 predictable 50:2 50:17 predominantly	108:24 prefer 51:10 186:22 preference 212:16 213:1 preferred 36:16 prejudice 159:18 231:10 premature 268:6 premised 257:5 prepared 6:16 11:10 13:15 23:24 41:9 preparing 31:16 98:2 presence 246:17 252:9 254:5 present 41:6 149:22 presentation 265:2 presently 41:4 preserve 28:5 pressure 126:7 154:4,9 155:11 155:13 182:24 245:22 pressured 155:7 224:9 pressurised 250:22 presumably 50:16 pretty 30:10 34:23 90:21,22 91:5 149:5 prevent 44:6 214:5 215:15 261:2 prevented 75:25 76:2 213:25 236:15 252:5 previous 3:9 28:21 36:25 99:19 106:8 111:8 112:11 129:17 136:20,21 150:10 173:15,23 181:11 200:1 219:3 previously 225:4 primarily 157:8 157:13	primary 57:12 214:17 principal 31:25 57:18 59:4 105:15 227:17 230:18 principle 183:13 184:1 214:23 215:4,7 Principles 214:8,9 214:11 215:18 prior 55:2,8 57:21 60:25 198:23 199:2 200:5 private 94:12 119:10,12 120:16 191:25 220:22 221:21 258:21 259:12,13,17,19 260:16,18 privileged 54:21 probably 63:22 65:17 67:12 68:7 84:13 93:23 120:2 143:2 148:12 171:8 190:4 193:21 probity 128:10,15 130:13 problem 7:13 155:6 210:12,12 210:13 problems 29:2 120:11 procedural 26:8 35:18 39:12,23 40:3 49:1 50:24 131:18 procedure 77:5 85:7,25 130:25 procedures 172:8 172:9 proceed 23:18 39:18 76:18 123:15 133:24 134:17 163:16 185:6 195:5 212:16 224:3 225:9 231:20	proceeded 211:6 proceeding 18:19 76:1 87:10 261:3 261:8 proceedings 18:12 18:23 19:16 20:3 21:4 56:12,13,14 57:2,5 229:24 263:14 process 9:25 25:21 26:3,15 27:4,6,21 32:6 35:19 36:24 37:9 40:19,22 41:7 43:16 48:3 48:25 50:22,24 59:24 96:21 104:8 113:13,25 115:11 128:6 130:20 131:8,12 131:24 137:25 160:13 170:9 171:13 205:22 208:23,24 209:6 209:12 procured 7:22 produced 34:2 164:20,23 producing 126:12 professional 35:2 66:11 205:15 profile 120:9 138:9 prominence 168:6 pronounce 250:9 proper 8:10 91:23 159:18 166:7 254:25 255:16,20 269:13 properly 119:20 119:22,25 120:1 120:3,3,4 186:2 proposal 20:21 59:12 109:21 110:22 151:13 185:14 228:4 proposals 187:15 propose 88:19 225:6 229:24 235:10
---	---	--	---	--

proposed 38:10 231:3	provision 18:16 61:20 65:5	274:5	261:25 262:19 265:17 269:12 272:20	raises 160:5
proposing 19:15 225:1	provoked 99:15	putting 88:2 126:7 154:8 210:19	Questioned 1:5 51:15 143:12	raising 161:1
propriety 92:25 94:1 216:24	prudent 122:23 123:7,11 125:22	225:23 226:6 265:9	168:18 196:21 213:8	ran 75:20 122:12
prosecute 270:18 271:7	prudently 123:16 123:21	puzzled 5:23	questioner 259:18	rarely 105:11
prosecution 21:15 67:7 105:8 163:13 186:12,18 186:19,20 252:4 263:4 270:7 271:6	public 38:9 56:8 58:9,17 63:2 66:18 71:22 72:6 81:3,13 105:8 121:24 153:22 154:15 157:14,16 157:19 169:24 186:20 228:7 235:20 251:20 270:17	Pyle 26:17,21,22 27:25 31:3,4,19 34:22 35:12 36:12,13 37:13 37:18 39:8 40:19 41:16 46:11,19 47:3,25 48:4,8,13 48:18 49:17 50:9 130:20 136:3,6 136:11,23 137:19 137:23,24 138:3 138:23,25 139:15 140:16,17 141:1 142:16 165:17,19 198:1,3,17 268:2 269:1	questioning 237:9 257:4,8	rationalisation 105:16 106:21 108:25 112:7 125:15 126:1,3 218:4,20
prosecutions 54:5 58:10,17 66:20 71:22 81:13 153:22 154:15 228:8 235:21	publication 29:24	Pyle's 27:7,11 45:21 46:3 135:17	questions 51:4 61:18 168:12 196:19 208:5 211:10 226:14 229:20 246:14 247:3 257:11,14 265:9	re-assess 236:3
prosecutorial 183:17 200:4	publicly 25:2		quick 88:4 219:3	re-reading 97:13
prosequi 161:3 265:22	published 16:10	Q	quicker 187:6 190:1 229:18 273:6	reach 111:14 127:6
protect 145:15 187:18 195:22 217:5,6 256:9 263:9,9,10 264:4	pull 21:23 156:17	qualification 93:7	quietly 187:6	reached 112:4 125:12 147:9 149:20 153:19 154:22 175:14
protected 196:4,9 211:14,17 264:5 264:6,7	pure 124:23	Queen's 178:6,7	quieter 187:6	react 30:13 176:16
protecting 157:9 157:13 161:6 196:9,10 199:10 200:12 216:20 263:12	purport 95:24	question 14:22 20:11 22:3 36:8 41:15 43:11 50:7 52:1 62:18 69:5 71:8 73:17 78:16 79:17 81:15,17 84:17 88:14 101:20 113:5 124:7 127:23,24 140:10,24 142:5 142:22 146:18 152:1 155:24 156:11,13 166:16 169:2,4 172:6 176:11 178:1,3 183:25 187:4,24 192:8 193:25 194:11 198:21 199:22,22 206:5 211:14 239:17 245:17 259:6	quietly 239:19	reacted 78:14 133:10
protection 157:12 212:2 235:25	purpose 21:3 34:14 65:4,11 106:24 118:2 156:8 223:13		quite 34:12 42:17 43:12 48:2 57:22 94:19 98:22 114:8 122:16 142:11 150:5 168:16 171:10 178:4 196:19 198:22 207:11 228:17 231:12 239:21 250:8 265:19	reacting 30:15 87:3
protocol 121:18	purposes 202:21 223:14		quieter 187:6	reaction 84:23 87:1 133:15 146:7 171:21 176:4 181:24 219:6,6,12,14,24 220:4,6 222:14 232:10 264:22
prove 189:19	pursue 236:17		quietly 239:19	reactions 86:22 219:15
provide 29:9 45:5 45:12 62:10 126:8 226:4 248:2	pushed 127:19		quite 34:12 42:17 43:12 48:2 57:22 94:19 98:22 114:8 122:16 142:11 150:5 168:16 171:10 178:4 196:19 198:22 207:11 228:17 231:12 239:21 250:8 265:19	read 3:14 17:18 35:2 47:7 49:8 63:18 109:9 131:9 202:15,21 204:23 207:24 208:2 211:1 217:23,24 218:1 218:18 220:5,8 220:13 239:2,11 240:25 260:8
provided 1:19 5:21,22 23:7,19 55:16 56:4 65:22	pushing 232:10		quorate 38:2	reading 101:12 220:7 240:13,15
provides 41:25 244:3	put 53:18 66:20 67:5 86:3 97:10 107:9 122:20 124:10 129:10 132:2 154:5 157:3 161:25 164:20,24 173:20 206:5 210:20,20 212:1 215:16 217:19 219:19 224:13 226:7,8 227:19 228:4 229:20 230:17 242:16 244:15,22 251:1,19,25 252:3 259:15 261:21 265:17		quoting 83:10	ready 191:6 228:21 272:11 273:12,21
providing 65:22			R	real 75:23 99:12 139:1 167:13 242:3
			radar 208:7	
			raise 23:10 55:13 107:12 163:23	
			raised 21:16,25 22:2 23:15 160:3 172:6 262:19 263:21 271:13,15	

realise 74:11	268:17	136:6	regardless 216:22	244:17
realised 73:8 80:9	recalled 24:19	records 90:24	216:23,24 217:1	relevance 47:14
80:15 87:21	recap 102:13	136:22	255:9,11 260:17	relevant 21:19
146:14,19	242:19	red 16:11 177:14	Regiment 107:18	22:7,19 38:18,25
reality 164:3,6	receipt 82:3 159:1	redacted 6:17	regret 94:9 103:9	42:14 45:2 47:11
185:9	receive 185:1	272:7	127:15 128:2	58:19,25 59:6
really 49:1 58:2	262:22 263:1	refer 19:20 93:7	145:17	134:19 173:9,11
73:16 122:13	received 9:25	108:15 165:25	rehearsed 244:14	173:12 264:13,15
146:3 159:13	11:22 24:15 34:8	167:19 191:9	246:17	rely 21:24 214:22
167:23 168:4	64:11 67:3 78:22	197:15 216:20	rehearsing 176:19	remain 41:2 42:13
178:19 184:6	80:9,15 81:23	reference 3:11 9:3	reject 263:6	remained 200:10
185:25 209:10,13	86:22 105:7	17:12 18:21 23:6	rejected 208:22	remaining 150:13
227:25 265:4	126:14 131:10	46:18 50:3 56:3	263:7	remark 226:17
269:12	134:16 159:11	56:21 138:12	related 108:13	remarkable 32:16
reason 19:23 24:3	175:15 188:6	179:25 192:14	262:11 266:15	33:7
31:25 59:2,10	204:8	193:1 197:25	relates 57:13	remember 4:15
70:11 97:21	receives 79:9	203:13,20 204:7	86:16 147:8	5:24 9:19 10:11
108:5,16 123:18	receiving 97:1	213:14 227:13	relating 61:17	11:5 13:18 24:25
149:4 154:7	106:11 129:15	238:12,14 239:5	63:10 82:13	27:11,15,19
205:18 212:23	recipient 78:13	250:5	86:15 104:6	31:21 33:4 34:17
247:23 253:22	82:18	references 129:7	158:7 159:1	35:22 36:7 40:1
reasons 7:20 23:25	recognise 44:20	130:18 217:9	relation 1:13 6:23	42:17 48:23,23
24:5,6 28:10	166:6 199:17	228:14 240:23	6:25 7:3 17:5	49:18 50:4 52:7
31:8 75:8 81:25	246:15	Referendum 60:19	23:23 25:15	62:22 65:8,8
85:3 94:4 95:4,5	recognised 44:19	referred 33:8	39:22 44:24 49:1	69:14 70:6 77:12
96:6 98:12	169:19	47:25 50:13	50:17,24 53:1,25	80:20 83:22,25
101:14 113:7	recognising 36:17	148:14 202:14	55:9 60:11 68:19	83:25 84:2,6,9
122:3 123:8,20	recollect 5:18 43:3	203:1 210:5	69:2 71:6,17	86:21 97:1,5
123:25 160:14	46:5,6 65:11	238:17	82:7,9 85:6 87:4	98:1,3,9 105:20
176:24 252:22	74:4 155:25	referring 15:8,15	97:15 108:9	108:19 114:11,17
253:14 265:23	189:21 272:23	18:16 21:9 22:14	109:24 114:15	129:2,14 135:18
266:2,9,17,18,24	recollection 7:16	24:20 32:20	142:11 145:12	158:15 170:6,11
267:6,16,18	31:12 37:7 45:22	46:23 110:21	158:16 159:23	171:11,16,19,19
reassurance 95:17	65:18,19 84:15	140:11 150:22	165:14 167:25	171:25 172:3,5,5
reassure 95:20	100:10 101:12	167:8 182:15	193:5,13 194:2	172:20 173:2,5
rebuttal 45:5	109:1 114:6,7	270:4 271:5,6	197:9 198:14	175:22,25 176:3
recall 5:19 6:20,22	134:24 161:5,11	272:12	208:12 221:5	176:8,9,10,14
6:23 30:15 33:23	180:19 204:5	refers 13:17 21:10	223:21 241:12	178:10,17 179:1
34:24 35:15 64:8	230:20 271:12	86:13 171:4	258:16,20 259:2	179:22 182:1
90:4 96:17	272:25 274:9	reflect 15:21 83:17	264:22 267:22	188:13 189:12
108:18 145:12	record 39:7 45:4	111:18 128:18	relations 200:16	190:13,14 191:1
158:4,8,12,13,15	53:19 124:2	reflected 36:14	relationship 1:11	198:2,7 204:22
158:22 161:1	165:7,13,16	39:1 61:16	2:7 12:10 55:1,6	213:16 215:20
172:16 174:17,20	189:17 210:9	111:25 194:21	55:11 66:11	219:10 226:14
202:13 224:17	241:18	refuse 70:25 71:12	78:11,19 121:4	253:5 257:18
225:22 226:5	recorded 21:11	refute 104:10	147:12 164:16	259:14 262:25
229:4 230:14,18	34:4 178:11	regard 45:3	176:5	268:21,23 269:3
237:18 251:5	180:13	135:24	relatively 155:19	remembered
253:8 259:11	recording 13:13	regarding 23:8	relaxed 150:8	84:12 110:10

161:8 remind 16:17 52:15 184:3 197:6,19 207:20 reminded 1:16,23 6:1 52:5,8,12 reminding 215:17 remit 56:24 remotely 44:1 removal 25:16 267:22 268:1 removed 48:3 213:15 repeat 95:2 146:18 repeated 210:21 repeatedly 44:10 repeating 187:24 replaced 193:3 replied 94:25 217:8 reply 17:20 20:22 32:15 33:7,18 69:20 88:4 98:8 104:10 142:22 167:4,12 185:4 192:10 201:2 203:2 205:11 209:7 211:23 227:6 241:5,8 248:25 replying 50:14 131:5 238:8 270:24 report 16:9,10 86:12 159:10 164:11 182:20 183:9 197:15,17 205:2 215:17 233:19 234:2 237:25 255:10 267:18 reported 134:14 164:2 reporting 138:4 140:12 159:9 reports 24:16 55:18 86:20,23 88:5 representation	241:22 250:10 representations 28:5 39:4 262:22 263:2 represented 53:23 reproduce 21:19 reputation 75:4,5 75:15,20,24 76:11 199:11 200:13 217:5 reputational 118:12 120:25 122:21 252:2 request 29:14 213:12 263:6 requested 192:22 required 121:15 193:6 257:23 requirement 29:13 58:23 61:20 requires 58:18 166:3 214:25 215:11 247:18,19 research 62:15 resent 44:11 reserve 243:11,15 resign 38:5 114:16 resignation 25:16 38:16 42:6 47:21 48:1 resist 221:22 resisting 247:9 resolve 36:17 207:15 209:12 resolving 206:21 respect 166:7,9,10 166:11 171:10 173:12 192:21,24 225:12 260:10 respectively 128:21 respond 14:8 30:14 36:13 91:25 responded 46:19 responding 91:16 responds 32:14 response 7:13 23:20 36:22	41:17 45:17,19 45:25 98:2 171:11 218:15,16 responses 179:25 responsibilities 142:10 212:5 responsibility 41:22 42:3 54:5 66:19 199:18 201:10 responsible 201:25 responsive 91:13 rest 68:8 restructure 59:13 59:24 result 105:7 149:20 results 149:19 retire 46:19 48:10 114:16 140:5 retire' 47:7 retired 85:13 139:19 retirement 24:14 25:16 27:8 47:10 48:1 85:7,21 113:12 253:14 267:24 268:7,14 retrace 3:22 72:24 100:10 136:13 retraced 137:23 retracing 79:17 return 194:11 returned 89:15 96:17 234:23 reveal 23:25 revert 49:12 reverting 259:10 review 45:18 47:16 129:7 208:16 227:10 240:7 244:9 revisit 237:16 RGP 10:21 11:10 11:14 13:14 14:7 14:20,23 24:21 28:12,24 29:5 43:25 44:6 72:21 77:17,24 98:5,15	99:10,12 104:8 106:9 109:18 112:5 120:25 125:12 126:10,14 132:18 134:16 148:2,4,9,18 149:2,8 154:11 166:8 167:20 173:16 175:16 187:7 206:14,15 211:22 223:15 231:11,14,24 232:17 233:2,8 233:10,19 234:4 234:9,15,16 236:2 237:25 240:7,8 243:11 244:1 247:11,13 252:19,23 RGP's 105:10 174:2,3,15,18 224:3 225:17 230:2 234:20 235:5 243:16 Rhoda 58:3,6 Richardson 3:16 14:14 34:5 75:9 75:10 98:16 110:18 111:2 149:23 152:9 163:18 169:10,19 171:11 181:3 182:12 185:14 194:20 197:23 202:2 203:8 205:6 206:6 220:21 223:24 239:13 241:10,16 243:12 245:17 246:13,23 247:6 247:15 249:15,25 250:6 260:19,23 261:12 Richardson's 118:7 171:21 181:6 260:4,6 riddance 166:21 right 13:7 37:3 51:21,22 57:11	58:7,11 63:7,22 64:19 78:6 83:18 89:9,23,24 90:1,8 90:17 91:4 92:12 94:7 99:8 102:17 103:3,10,11,12 103:18 105:24 110:3 114:16 118:3 120:23 125:6 129:20 130:21 141:8 142:1 156:5 160:6,15 162:9 163:5,11 169:17 173:25 175:7 176:15 195:18,23 197:17 203:7 206:2,9 207:15 210:4,25 214:10 232:14 237:16 250:24 270:6,13 272:1 rightly 11:18 157:24 185:1 rights 160:6 risk 122:21 146:5 risks 118:12 119:4 120:25 rival 116:1 robust 249:21 Rocca 96:9 106:3 107:8 173:15,22 174:10 194:20 203:8,11,16 204:13,17,19 205:8,16,24 206:4 210:3 225:4 227:1 228:6 231:22 238:6 243:19 244:5 245:18 246:1,6 249:7 264:19 265:18 Rocca's 187:5 205:19 229:5,6 266:6 role 11:12 12:3 14:16 25:15,20 27:6 30:5 44:23
---	---	--	---	--

48:25 55:25 57:9 57:12,16 59:3,7 131:25 169:23 182:8 198:24 199:3,18,25 200:7 201:14 234:14,19 267:22 270:17 roles 211:22 room 28:3 81:11 81:14 82:4 153:20,25 155:3 181:16 round 204:14 Royal 47:10 107:18 162:5 RPG 242:3 rude 193:14 rules 67:6 run 68:7 75:7,16 75:22 122:12	saw 5:22 19:21,22 48:25 86:4,18,20 110:7 114:7,24 118:11 119:4 121:22 122:14 143:21 144:2,19 147:4 181:7 198:10,13 205:2 219:19 222:17 saying 5:11 6:5,21 25:8 26:18 30:22 37:3 46:20 49:7 68:1 92:4 95:12 95:16,18 106:3 115:9 124:25 135:18 137:3 140:19 144:1 145:4 155:13 159:12 161:22 162:2,5 167:1,12 171:13,22 175:16 185:22 187:17 207:9 215:20 227:6 232:14 238:9 239:4 240:10 241:13 242:24 249:1 261:15 266:17 271:9 272:17 says 2:23 7:11,19 8:3 15:8 16:9 18:9 20:15 21:21 21:22 23:9,12 28:15,16,18,20 29:8,15 33:5,6 35:11 36:13 37:14 40:10,11 40:20 47:3 48:13 56:6 85:9 87:9 96:11 108:4,22 112:3 128:10 129:6 134:20 135:18 137:6,19 138:2,3,7 150:11 150:23,25 160:2 160:25 165:21 189:24 191:5 197:13 204:12 218:22 220:18	222:20 229:18 239:2 241:6,10 241:16 245:15,18 245:19 246:1,8 246:23 270:1,20 272:10 scale 145:25 Scratch 263:17 screen 9:3 37:19 42:15 56:2 61:11 65:1 129:20 147:18 171:6 203:3 217:19,21 220:15 228:15 screw 166:4 scroll 125:9 scrutiny 36:19 sea 33:10 130:2 159:3 163:20 sealed 227:8 search 17:12 18:18 78:3 86:15,17 87:9,13,18 99:13 109:21 110:9,23 110:25 111:11 116:18 132:20,24 133:24 134:17 135:25 140:8 141:20 144:5,10 147:1 174:4,19 175:9,10 203:24 208:12 209:20 218:12 248:13 261:3,8 seat 267:12 second 6:7 7:19 21:8 24:10 38:21 44:22 91:14,15 104:18 108:2 110:16 125:10 135:16 190:17 192:7 197:7 206:3,25 220:9 220:17 248:22 264:16 273:16 secondly 5:19 43:11 145:24 seconds 219:9 secret 121:8	secretary 23:7 261:24 269:1 Secretary's 268:24 section 7:19 16:19 18:7 27:9,9 29:14 38:15 40:23 41:22,24 41:25 42:11,23 43:2 47:12 56:2 56:5,25 57:4 58:18 61:9,13,16 86:14 88:6,6 114:14,21 135:8 135:12 140:4 162:25 163:2 179:24 180:6 199:23 201:12 sections 38:19 128:8 151:9 200:25 201:8 secure 27:8 38:16 76:18 security 115:24 146:6 see 2:21 5:12 10:19 11:19 14:3 17:9 19:5 28:3 30:1 31:14 32:14 33:5 34:7,11 38:22 40:16 47:23 50:20 54:11 55:21,24 61:6,7 67:16 68:17 70:14 87:19 90:7 94:18 97:23 98:12,13 111:9 114:2 125:16 129:16,18,19,22 130:5 133:14 140:10 150:1 161:25 190:17,22 192:9 197:13 206:24 209:16 220:18 221:14,23 221:23 223:11 226:1,25 238:5 238:12 241:3 248:20,22 250:18 256:19 269:20	271:16 seeing 97:5 129:2 214:1 seek 229:21 231:11 258:15,23 258:25 seeking 3:8 20:8 95:22 108:4,4 157:1 159:17 235:7 seeks 105:11 seen 4:24 23:23 31:15 32:24 36:20 114:9 118:11,14 122:18 122:19 151:8 152:7 168:2 184:18 204:1,16 221:18 228:18 230:15 269:25 274:11 selected 266:19 selection 172:18 selective 248:19 send 72:10,12,15 127:7 167:1 243:25 273:15 sending 6:8 16:25 17:8 19:24 28:13 86:9,10 88:3,21 94:9 96:2 135:3 140:18,23 141:1 183:2,18,23 189:15 215:16 273:4 sends 16:7 18:4 49:25 129:6,13 189:22 218:9 248:25 senior 28:11 29:5 109:22 117:25 122:11 126:23 153:23 180:22 202:1 240:10 242:10 sense 88:14 95:13 112:22 119:6,17 128:14 182:4 216:12 224:7
S				
S-H-I-T 250:7 Sabbath 10:13,13 sabbatical 66:8 sad 34:9 safe 76:19 safeguard 251:16 safeguards 251:3 sake 134:23 152:25 197:16 salary 49:14 Sanchez 116:3 170:8 171:12,20 172:6 263:9 sanctioned 132:25 Santos 1:5,6,12 14:12 17:19 20:4 28:6 30:16 51:2 51:6 70:21 71:16 78:8 85:23 86:25 87:7 111:15 129:23 130:17 228:13 229:8,12 272:2 274:16,23 274:25 275:4,7 Santos' 228:22 sat 31:14 67:2 satisfy 247:11				

245:20 270:14 sensible 243:7 sensing 181:3 sensitive 75:17,18 sent 3:15,16 4:23 6:5 7:18,24 9:16 14:4 15:22 17:25 18:7 22:13,23 28:9,18,20 33:17 34:18 43:18 46:13,14 64:6 77:20 87:16 88:21 96:9 101:15 112:24 114:8 131:4 134:4 137:19 139:17 158:24 171:24 176:12 181:11 182:20 184:8 189:24 191:4 202:24 203:7 218:10 219:4 238:23 239:13 261:24 273:9,21 sentence 8:2 110:20 262:15 separate 14:10 158:10 167:2 267:14 separately 158:11 sequel 60:19 series 42:1 serious 11:23 98:14 99:7,10 106:18 127:21 128:17 131:5 135:23 146:4 158:17 159:10 185:4 206:23 207:18 seriously 54:15 181:4 244:4,5 servant 116:3 served 58:15 service 64:22 65:5 65:21 Services 38:10 set 7:19 21:18	25:24 28:10 53:19 57:10 63:17 64:22 65:10 73:1 85:13 96:14 99:10 234:1 273:14 sets 22:24 29:8 65:18 136:19 138:7 seven 208:21 227:7,18 230:16 232:5 236:1 seventh 241:13 shake 127:4 shape 73:15 share 58:1 174:11 176:20 257:10 266:18 267:5 shared 30:4 184:7 184:8 266:24 267:7 shareholder 67:14 67:24 shareholders 68:4 shareholding 173:1 shares 65:25 116:1 sharing 142:10 163:21,25 Shawcross 183:12 183:20 214:8,9 214:10,23 215:4 215:6,18 shock 86:2 104:1 144:22 shocked 44:11 103:1 shop 121:11 short 11:9 19:6 51:13 93:8 101:3 101:9 102:6 143:9 155:19 163:19 188:10,24 193:14 212:12 225:25 266:24 267:21 275:2 shorthand 207:12 shortly 7:6 31:22 77:21 160:25	207:1 232:24 show 16:15 41:14 95:19 140:19 166:6 184:11 190:16,23 showed 104:16 115:13 197:22 showing 215:19 216:17 shown 106:2 162:24 198:4 shows 136:5 242:5 shut 227:19 230:17 shutting 89:2,4 side 70:16 185:16 222:13 significance 95:25 significant 173:3 significantly 135:1 silk 58:6 similar 175:18 simple 227:3 simply 12:5 52:20 135:4 177:2 187:7 simultaneously 233:5 sir 83:25 168:11 197:2 212:14,18 212:18,24 213:8 213:9 220:1,5,6 220:12,14 222:2 226:11,15,19,23 229:9,13 236:7 236:10,12 237:12 237:15 241:4 242:23 263:15,16 265:3,4,6,15,21 267:20 269:8,8 269:11,14 271:18 sit 45:12 227:7 sitting 94:23 273:17 situation 11:17 14:18 41:24 45:16 58:2 98:19 99:3,9 102:8 103:23,24 104:13	106:7 117:3 128:19 150:15 154:5,9 157:2 166:3 183:7 185:12 195:13 210:23 223:9 257:22 273:4 six 88:1 171:1,8 198:7 208:21 240:2 slightest 231:23 slower 241:17 small 266:20 smoking 196:14 217:10 so-called 55:18 167:10 socially 61:6,7,8 soft 169:6 software 108:11 solicitors 262:25 solve 210:12 somebody 15:3 60:23 147:10 183:21 191:19 230:6 243:8 265:24 somewhat 121:10 son 6:2,2,9,14 189:3 190:15 272:4 273:9 soon 106:18 114:8 166:18,22 232:23 271:3,10 sorry 2:2 3:10 4:5 13:25 14:1 15:11 15:17 22:11 37:16,17 42:16 46:13 47:2 49:6 50:10 52:1,17 62:17 63:21 69:19 70:14,15 71:8 72:19 76:6 79:8 90:2,8,10 93:20 101:20 102:5 105:22 109:5,15 110:2 114:16 123:10,12 129:16 135:16,19	138:18 145:8 148:8 156:13 157:4 158:25 160:23 164:22 196:25 199:1 208:1 211:15 226:1,7,12,19 257:25 259:2 265:3 272:5 sort 67:6 73:13 163:1 205:24 sorting 210:17 sought 126:25 261:7 sound 112:13 250:21 soundboard 26:14 26:22 sounding 193:14 source 10:19 185:25 sovereignty 122:9 Spain 28:23 Spanish 144:12,13 197:18 248:9 speak 13:3 26:18 31:11 70:12,25 71:6,11,23,25 78:23 79:14 80:24 90:20 93:12 188:16,17 198:16 236:24 253:17 265:10 speaking 92:25 96:3 100:6 108:19 117:22 133:3 168:1 220:24 239:17 special 194:8,10 194:12,17,23 specific 182:15 199:23 209:18 223:23 specifically 87:17 specifics 146:11 speculate 82:20,23 spend 262:10 spending 150:5 228:17
--	---	---	--	---

<p>spent 121:16,19 152:15 178:13</p> <p>spoke 40:2 84:1 89:10 90:6,12,16 90:18 100:4,8,9 100:11 108:19 132:16 142:10 148:16,16 189:4</p> <p>spoken 10:23 11:7 32:17 33:20 68:16 79:25 92:2 148:4 149:7,9 167:6 171:17 188:7,9,23 237:25</p> <p>spot 177:21</p> <p>spur 84:23</p> <p>staff 122:7</p> <p>stage 19:24 48:2 66:17 97:19 99:17 103:17 145:21 147:11 182:3 198:2 204:14 207:14 263:13 264:2 270:19</p> <p>stake 69:18,19,21</p> <p>stand 45:4 124:18 184:17 228:10 237:17</p> <p>standards 16:23</p> <p>start 9:25 10:2 126:25 213:10</p> <p>started 40:12 126:6 131:16 181:14 264:15 270:7</p> <p>starting 28:11 29:4,15 30:22 248:1</p> <p>startled 162:14</p> <p>starts 9:20 28:13 51:8</p> <p>state 47:8 178:5</p> <p>stated 110:11</p> <p>statement 13:15 13:18 14:2,21 15:10,12,24,24 15:25 25:13,25</p>	<p>37:8 50:16 63:2 63:12,18,20,25 65:15 91:14,14 91:17 92:9,17 103:5 111:17 115:21 116:14,16 116:19 122:15 123:3,5,23 126:8 126:14 131:8,14 145:6 150:3 167:22 185:15 188:19 195:5 197:8 211:20,24 230:22,22 232:7 232:18,20,20 236:2,5,6,11,12 243:18 244:1,1 246:2,2,10,20 247:11 248:25 249:1,5,19 264:17</p> <p>statements 23:7 37:5 62:14,20 110:12 121:24 124:14 165:17 256:4</p> <p>states 57:16</p> <p>stating 132:3</p> <p>status 185:7 195:7 223:21 224:6 230:23</p> <p>statute 214:17</p> <p>statutory 25:15,20 61:20 164:16 215:5</p> <p>stay 51:3 156:8 177:6</p> <p>stayed 156:23 186:3</p> <p>step 27:3 60:12 125:20 144:7 206:12 231:8</p> <p>stepped 179:17</p> <p>steps 36:25 112:15 120:18 125:25</p> <p>stigma 153:5</p> <p>stood 155:16</p> <p>stop 142:24 155:16 162:4,6 186:11</p>	<p>186:12,17,18 207:4 213:7 217:10 222:12,13 230:11 242:24 251:21 252:6 254:4</p> <p>stopped 76:18</p> <p>stopping 21:14</p> <p>stops 21:22</p> <p>straight 129:9 184:11,14 215:19 215:23 216:17</p> <p>straightaway 80:22</p> <p>strange 210:10</p> <p>strategy 12:4 194:20</p> <p>stray 265:16</p> <p>stress 220:11</p> <p>stressed 220:12</p> <p>stretch 212:20</p> <p>strike 30:21 177:15</p> <p>strong 134:2 154:2 157:7 181:10</p> <p>strongly 117:12 132:4,19 134:9 140:8 141:20 252:18</p> <p>struck 173:8,10,21</p> <p>style 55:10,19,23 121:7,12 122:17 122:22</p> <p>sub 88:6</p> <p>subject 15:13 47:6 61:14 76:14 144:4 146:25</p> <p>submitted 113:11</p> <p>submitting 113:20</p> <p>subsection 56:8,16 56:17 61:11</p> <p>subsections 56:19</p> <p>subsequent 268:14 272:15</p> <p>subsequently 65:12 73:1 92:5 203:14</p> <p>subsided 181:13</p> <p>subsidiary 115:5</p>	<p>substance 69:10 179:16</p> <p>substantially 225:16</p> <p>substantive 148:23</p> <p>succeed 212:19</p> <p>such' 18:20 20:19 87:11 88:24</p> <p>sufficient 244:3</p> <p>sufficiently 12:9 32:4</p> <p>suggest 209:2 215:8 256:8 264:14</p> <p>suggested 188:16 257:1 259:12</p> <p>suggesting 19:4 43:4 84:8 96:23 153:7 162:13 177:24 187:11 241:11</p> <p>suggestion 111:14 152:6 171:12 179:15 187:14 227:15 231:23 258:8</p> <p>suggests 98:3 151:11</p> <p>suitably 6:17</p> <p>summarise 207:9</p> <p>summary 122:24</p> <p>summoning 38:23</p> <p>Sunday 12:15 48:9 48:19</p> <p>Superintendent 197:23 241:9 244:4 245:17 247:15 249:15,25</p> <p>superintendent's 200:7</p> <p>superiors 141:1</p> <p>support 16:19 29:3 166:4 184:20 211:12,13 211:16 230:5</p> <p>supported 85:19 116:23</p> <p>supporting 249:13</p> <p>supportive 228:24</p>	<p>245:4</p> <p>suppose 4:4 61:5 101:14 116:17 177:3 183:6 268:10</p> <p>supposed 100:13 253:13</p> <p>supposition 257:6</p> <p>sure 3:5 26:6 32:25 34:23 35:12 51:5,11 61:16 89:9 90:19 90:21,22,22 91:5 111:4 114:5 122:2 129:8,9 132:5,8 140:20 143:5 144:15 149:5 161:9 182:6 211:15,16 223:17 237:7 238:24 239:22 241:17 257:14 261:14 269:14 271:2 274:4,4</p> <p>surely 84:11</p> <p>surmise 8:19</p> <p>surmising 8:24</p> <p>surprise 8:3 110:6 264:18</p> <p>surprised 27:24 109:13 139:8 168:4 169:12,14</p> <p>surprising 115:17</p> <p>suspect 8:10 12:23 32:3 93:1,5 94:1 94:16 95:18 148:5,8,10 152:23 174:9 185:8 195:7 216:16 217:16 223:21 224:6 230:24 232:16 234:22 247:22 254:16 255:3,7</p> <p>suspected 64:21 65:3</p> <p>suspects 116:4 150:13 254:19</p> <p>suspend 42:5</p>
--	---	---	--	---

suspicious 213:20	talked 165:3	118:8,15 119:7	211:4	88:21 89:12,24
swipe 264:4	talking 49:20,21	120:8,17 123:6	theme 242:7	90:7,12 92:16,21
sworn 166:13	91:22 92:7,13	123:22 125:22	theory 257:5	93:11 94:5 99:5
system 115:24	93:5 100:3 101:5	127:7 139:1,3	thereabouts 87:22	99:25 100:8,9
146:5	118:4 155:20	147:19 155:8	thing 33:15,17,19	101:10 104:7
	178:20 182:2	158:13,15 173:17	80:25 95:20	111:6 113:4
T	209:19 270:22	tender 197:20	107:5 131:13	115:4,12,18
table 198:16	tampered 16:14	tendering 47:21	151:6 152:3	117:21 119:8
tabs 40:14	17:17	tense 181:14	179:17 190:12	121:8 123:5
tact 121:9	tantamount	tension 152:22	219:22 227:17	126:23 127:24,25
tactical 250:16	252:25	181:12,13	229:2,22 230:18	128:18 129:23
tailored 117:1	tarmac 166:17	terms 11:13 16:18	243:7 247:14,22	130:7 131:10
take 5:14 18:11,22	taunting 264:1	29:6 39:18 45:17	250:4 270:2,20	133:9,11 136:8
19:8,15 25:21	tax 35:14	48:11 83:3	things 20:14 37:14	136:10 143:3
27:3 36:19 39:1	team 5:21 51:24	106:19 201:19	37:22 86:2 96:21	145:22 147:18
39:15 46:25	52:3 60:1 118:1	202:4 219:16	111:8 122:20	148:6,11,19,21
52:24 54:14	134:21 243:25	256:1 265:12	138:7 149:15	149:22 151:4
55:21,23 56:12	250:18,18	268:14,18,18,20	160:18 164:14	152:2,25 154:7
57:15 60:11	tears 146:2 196:17	terrible 2:13	172:13,14,22	154:17,22 155:24
64:22 92:3,24	technical 16:13	terribly 213:19,19	173:25 177:23,23	156:7 160:2
93:4,25 99:21	17:15 87:1	213:20,20,21,21	183:23 213:24	161:7,18 162:25
100:5,13 101:24	telegram 138:1	territory 265:20	224:2 229:14	165:15 167:7,13
103:6 112:5,15	139:16	test 161:2 186:20	257:3 268:21	167:22 169:13
114:18 120:17	telephone 90:11	187:1	think 2:24 3:7,13	171:4 174:5
122:23 125:13,22	93:8 185:18	text 55:17 68:22	3:17,22,24 4:2,11	176:14 177:20
129:11 132:13	186:2 191:12	89:22 90:2 94:9	4:13,24 5:25 7:5	181:13 182:14
135:9 142:17	193:20,23 236:24	96:3 124:8	8:10 9:15 10:9	183:1,18,22,24
143:5 170:4	238:4	132:12 134:25	10:11 11:5,17,18	184:2,23 188:15
179:23 182:1	telephones 174:4	135:3 137:7	12:25 13:4,5,7,24	188:17 189:7,24
203:21 212:9	174:19 175:10	147:4 175:16	15:2,4,7 18:21	191:15,18 192:2
221:13,17 225:18	186:3,7 191:10	176:7	19:9,18 22:14	193:19,22 194:22
231:24 233:3	191:16	texted 102:15	26:7 29:8,13,17	196:12,15,18,19
235:24 244:18	tell 10:21 11:2,9	135:1 148:7,9	30:8,8 31:15	197:5,11 198:12
247:1,1 250:17	12:16 13:9,21	162:24	33:9,22 35:5,17	198:14 200:20,23
255:12 263:25	71:5 110:7	texting 91:9 94:1	36:2,8 37:3,5	202:16 203:20
269:12,17 270:10	111:21 118:3	94:15	39:2,9 40:15	204:5,19,23
272:19	120:13 123:12	texts 63:5	44:19 45:9,20	206:8 207:21,22
taken 8:12 37:15	139:7,8,21 140:6	thank 6:20 25:18	46:1 48:19,21	207:22 214:12
37:22 39:4,25	141:15,19 142:3	51:2 56:5 123:2	49:9 50:13 51:3	215:9,22 216:6,8
40:21 97:12	142:12 148:3,18	123:19 143:6,7	54:12,23 56:21	216:16 217:8,13
100:20 101:1,21	149:2,8 158:20	168:9 171:3	57:19 58:7,14	219:23 220:8
109:10 110:6	166:14 174:14	196:20 199:15	60:13,14 62:21	221:11 223:5
111:22 124:17	176:12 187:25	212:8 217:20	65:15 67:2,23	225:1 227:3,9
125:20 126:1	190:11 196:13	236:12 250:24	68:4,7 70:25	228:7,22 229:1
144:7 167:23	222:21 232:25	263:16 267:19	76:4,13 77:1	229:15 231:11
222:11 253:16	243:10,23 253:24	269:8,10 272:1	78:1,7,24 79:7,25	232:23 233:9
talk 25:6 93:8,14	266:1	274:5,14,16,16	80:21,21 81:8,11	235:2,22 237:1,3
93:21,22,24	telling 6:9,14	274:18 275:7	82:10 83:3 84:5	237:10,12 238:11
101:18 102:14	73:14 93:10	thanks 104:18,19	84:13 86:23,25	239:12,16 240:11
194:16 208:6				

240:17 242:5,12 243:20 244:19,24 244:25 245:11,12 246:15 249:22 250:5 252:2 253:9 254:4,12 255:1,8 259:24 259:25 261:12 262:4 264:22,24 265:1 268:15 269:1,9 270:4,22 271:20 273:13 thinking 33:3,16 35:23 81:21 97:11 155:5 156:16 161:14 third 220:19 232:3 239:14 thirdly 5:20 thirds 238:5 242:17 thorough 205:17 206:10 thoroughly 205:15 thought 20:5 22:17 25:10 29:20 33:18 35:1 45:10 53:17 54:20 67:8 75:9 82:19,20,20,24 84:20 86:24 88:16 97:17 99:3 103:13,15 104:3 104:14 110:4 111:12 118:23 120:12 125:2 129:25 130:6,16 135:5 145:2 147:9,13,16,21 156:16 159:24 164:9 169:7 175:13 182:17 184:13,13 187:1 191:18,23 194:5 195:16 215:23 242:1 245:24 260:20 270:24 thoughts 31:6 34:24 121:10	thousands 124:3 threat 75:5,14,19 75:23 76:10,13 threats 250:5 three 25:23 43:22 59:18 68:8 85:11 111:23 113:19 116:11 122:11 135:21 136:2 150:13 154:25 161:17 192:5 194:2,22 223:18 232:3 239:22 242:7 271:21 threshold 161:2 throw 248:10 thumb 129:10 ticked 248:14 ticking 239:19 tied 218:23 time 2:3,11 3:21 8:21 17:19,22,23 20:1 22:20 25:3 27:14 30:3 31:14 31:16 36:3 39:5 42:21 44:11 48:14 49:3 51:1 51:7,13 53:24 54:2 60:16 61:1 62:16 68:12,17 72:4 81:23 87:5 90:5 94:24 99:18 100:11 102:24 118:13,25 121:19 121:21,25 122:14 124:5,18,20 126:10,11 142:23 143:6 150:5 155:5,5,21 163:6 163:25 164:4 165:18 166:18 174:14 175:19 178:13 184:16 186:4 191:14 192:16,23 194:4 194:6 195:1,3,12 206:25 207:5 208:3 212:12 219:5,13 220:9	228:18 245:20 251:17 264:20 267:6,10 timeline 1:19 times 75:3 98:23 147:12 161:17 191:9 210:22 228:19 271:21 timetable 54:17 timing 29:24 129:12 timings 227:12 tired 94:5 102:17 tiredness 104:2 title 193:1 199:7 today 28:15 42:13 127:8 150:6 218:5 229:14 244:19 257:5 told 4:11 8:6 11:5 11:6 13:14,20 15:23 37:23 50:10 51:19 53:17 73:13 93:11 103:19 115:11 117:15 126:4 127:13 130:6 132:17 133:2 134:15 135:5 136:3,14 137:4 138:21 139:2,11,12 142:4 148:9 151:21,23 156:21 156:21 164:7 169:16 178:7,24 178:25 185:17 188:18 190:10 205:25 219:8 225:6 tomorrow 47:19 189:14 tone 77:15 top 16:4 40:8 43:23 59:25 110:19 122:6 166:23 225:21 248:15,23 total 15:5 148:1	160:8 totally 29:2 245:4 touch 69:13 touched 20:13 206:20 227:8 touching 226:5 toyed 163:6 trace 139:5 transcript 3:3,14 15:2 21:12,19,20 34:2,12 70:7 101:12 148:20 150:2 152:7 207:21 210:7 217:9 220:15 221:10 223:5 225:22 231:12 238:3 271:24 transcription 222:3 transcripts 187:12 191:11 196:12 225:14 233:4 237:16 240:15,24 translate 144:14 translated 21:12 21:18 143:17 translation 144:15 248:10 transmitted 255:24 transmitting 12:5 transparency 15:5 148:2 237:20,20 242:15 transparent 14:15 14:23 62:7 236:23 237:4 255:11,13 transpired 261:21 travelling 178:14 traversing 121:3 tread 60:4 224:14 treated 76:12 212:3 234:22 treating 153:2 treatment 96:14 96:20 97:7 174:8 194:8,10,12,17	194:23 treaty 35:14 101:23 121:3 tremendous 123:16,21 125:23 trial 23:5 96:13,19 Triay 70:8 217:21 tried 44:4 90:11 232:14 261:1 troubled 223:24 Trudeau 182:20 183:8 215:17 true 17:18 25:1 58:21 77:1 111:18 122:13 268:4 trust 43:6 113:8 130:15 trusted 74:17,18 try 3:23 15:16 198:21 212:19 215:15 230:11,21 231:8 251:21 trying 3:22 5:25 11:17 14:1 76:20 79:7 88:20 98:23 100:9 120:16 127:2 133:1 136:13 139:5 173:18 182:23 184:11 195:20,22 225:16 226:19 272:23,24 274:7 TSN 36:4 41:13 Tuesday 274:22 274:23 275:9 turn 1:8 2:18 5:6 7:6 15:6 32:13 36:11 37:15,23 41:13 143:14 166:3 168:8 180:12 189:7 191:4 218:7 238:20 240:22 turned 6:11 7:10 32:19 190:21 198:17 204:14 turning 2:6 25:12 186:19 189:2
---	--	--	--	--

Tweet 50:11,14	16:24 68:2 93:21	uses 108:12 136:24	Volunteer 243:19	222:21 228:16
twice 90:16,18,19	112:4 125:12		volunteered'	233:4 238:10
91:4,8	147:9 150:19	V	246:11	240:8,22 241:17
two 2:24 4:1 5:10	165:22 227:16	vague 161:10	vulnerable 41:5,8	245:16 248:3
29:25 41:18	228:20	value 249:24		271:13 272:5,7
65:15,16 68:8	understands	valued 121:6	W	274:2
76:9 90:23 96:10	220:18,24	varies 2:14	Wagner 51:3,8,10	wanted 1:20 40:16
98:5,5 105:15	understatement	various 50:7,19	51:15 72:23	78:23 80:24 95:5
109:24,25 110:13	152:22	86:8 131:5 138:7	74:19 80:21 81:9	97:23 98:12,13
110:13 112:1	understood 125:3	187:21	84:25 88:3 94:20	98:16 129:19
117:24 124:14	165:23 169:7	vein 241:20 244:11	101:3 102:20	148:15 154:22
142:1 145:17	257:14	verbal 197:17	106:8 109:2	172:7 184:25
163:19 168:17,19	undertake 56:11	vernacular 157:14	110:5 114:5	188:16 192:11
173:25 188:6	77:3	version 143:17	123:4 124:20	193:1 239:11
191:6 203:1	unexplained	226:20	127:13 130:1,4	wanting 214:5
238:5 242:17	150:12	view 35:17 39:15	131:13 135:13	wants 107:12
247:1 269:12,13	unfair 25:4,10	118:7,7,9 128:21	137:22 140:9	213:7
272:9 273:2	44:8	128:22 134:2	142:23 143:1,12	warned 215:14
type 222:25	Unfortunately	169:23 176:15	146:10 147:8	warning 205:5
254:13	23:9	183:11 184:7	154:20 156:3,7	warrant 17:12
typed 172:15	uniform 166:13	186:24 205:19	156:14 157:24	18:18 77:3 78:3
typically 105:12	uninspected	218:5 225:7	162:22 167:21	78:6 80:7 86:2
	234:23	231:24 234:4,8	168:8,11 224:12	86:15,17 87:10
U	unjust 269:21	234:15,20 235:2	225:8,13,23	87:14,18 93:2
UK 121:25 122:2	unjustifiable	235:14,15,17	226:6,7,13 251:2	99:13 103:2
166:11 214:9,24	269:22	240:17 247:1	251:25 252:3	109:11,21 110:9
Ullger 275:1	unnecessary	249:1 250:13	264:20 269:11,17	110:23 112:16
ultimate 66:19	145:16 166:2	251:8,13,14	272:1	116:18 117:13
71:20,25 173:6	unobtained 245:22	252:13,25 253:2	Wagner's 243:1	132:20,24 133:24
ultimately 49:22	unopened 96:17	253:3,16,19	Wait 246:9	134:17 135:25
67:7 211:6	unorthodox	254:9,18,24	waiting 153:14	140:8 141:21
Um 260:7	233:17	255:2,12,15	Walliker 122:15	144:5,10 147:1
unable 41:7	unpack 206:9	257:10 260:1,25	wand 161:23,23	155:3 175:10,16
unannounced	unpleasant 166:2	261:9,9 269:21	263:24 270:2,21	203:25 208:11
189:3	unprecedented	269:21	wands 161:21	209:20 218:12
unaware 68:18	125:20	views 30:4 45:1	want 5:9 9:4 20:14	233:11,13,21,24
uncomfortable	unrebutted 45:5	148:13,24 154:2	41:14 43:20	234:5,6 261:4,9
83:21	unsolicited 19:2	167:5,6 182:11	55:25 63:9 70:10	warrants 7:22
underline 105:2	183:10	240:16 247:1	70:20 89:6,9	80:12,14 110:2
underlined 16:20	unspoken 239:17	252:15 260:18	95:1,2,9 102:13	110:25 111:11
105:5	untaken 49:11	virtually 5:16	104:21 128:5	112:12 174:4,19
undermining 96:4	untrue 131:5	203:9	129:8,18 132:4	175:18
understand 16:12	unusual 181:18	visibly 138:5	132:13 137:1	wasn't 10:9 20:6
17:11,15 19:14	211:5,7	vital 123:14 239:2	140:9,18 143:13	20:11,23 26:6,19
23:24 88:20	update 69:14	voice 90:10,12	144:12 150:7	28:7 57:25 69:7
188:14 192:1	updated 69:2	void 38:3	154:19 156:19	74:22 95:23
209:22 226:22	use 25:7 145:18	volatile 183:6	163:20 164:1	99:12 118:6
241:4 242:20	157:18 161:24	voluntary 4:20	165:2 168:12	119:11 127:13
247:23	167:24,25 198:15	185:14 192:18	189:10 207:24	145:21 148:22
understanding		213:13 236:6	212:14 218:11	

156:5 167:16 174:13 181:7 182:6 192:4 212:1 248:8 wave 166:19 way 10:3 12:1 17:18 25:5 38:16 38:18 52:6,13 81:6 104:12 115:13 121:12 122:11,13 133:10 152:17 153:2 154:17,19,23 164:1 170:5 171:13 176:15,18 178:11 181:7 184:4,21 185:12 186:1,6,11,17,23 190:16 191:3,6 193:4,11 195:3 208:8,10 210:19 210:20,20,24 220:25 223:19 224:2 227:3 238:6 240:10 242:17 245:1,1,6 245:9 248:1 254:11 272:18 ways 154:10 163:14 182:2 we'll 184:20 we're 101:24 106:17 118:16 208:8 244:24 we've 61:2 110:23 127:7 178:13,14 221:24,25 241:4 241:18 247:3 wear 104:2 wearing 179:3 wears 194:3 week 16:10 37:25 233:16 weeks 85:12,12,20 171:1,8 welcome 171:23 went 47:23 73:12 107:21 129:3,15 130:5 137:4	138:10 139:13 143:21 144:1 222:16 223:18 weren't 50:21 WhatsApp 2:19 5:22 6:3,4 16:2 77:20 78:14 80:10,16 89:25 129:19 132:5 134:19 141:22 143:22 144:2,3,6 144:9,19 189:22 190:3 218:9 219:5 222:17 273:5 WhatsApps 80:23 189:16 190:15 whatsoever 193:4 193:11 234:13,18 234:24 266:16 whilst 45:1 53:15 77:17,23 132:17 wholly 180:2 wide 199:22 widely 174:12 widows 242:9 wild 142:7,8 willing 24:1 54:24 window 158:9 wing 19:11 wish 35:13 231:11 wished 105:9 wishes 29:16 45:3 withdrawn 40:25 withdrew 274:21 witness 13:17 14:2 15:12,25 25:13 37:4,8 51:5 62:14,19 63:2,12 92:9 103:5 110:11 111:17 116:13,16,19 122:15 123:2,5 124:14 126:14 129:24 130:1 131:8,14 135:14 145:6 146:10 156:3,10,14 162:23 188:19	197:2,7 211:20 211:24 213:5 226:18,25 229:16 229:17 232:7,20 236:2,5,8,11,12 237:23 243:18,25 246:2 249:24 264:16 274:21 witness.' 249:23 witnessed 30:24 witnesses 53:14 wonder 162:12 183:1 wondering 9:8 10:8 word 76:23 93:14 93:21 99:1,8 193:3 222:3 272:19 words 16:20 47:8 72:4 83:11 91:19 127:15 128:16 134:21 150:22 157:10 168:25 177:4 191:7 215:24 221:11 229:22 work 33:1 172:10 181:16 200:8,10 200:14 226:20 worked 66:3 100:19 122:5 126:13 185:13 273:1 working 11:24 55:1,3,6 59:14 60:18 94:6 102:16 121:21 147:11 183:5 226:20 works 129:12 world 147:5 worries 183:22 worry 94:2,4,16 95:10,14,24 102:15 148:8,10 168:3 256:5 worse 37:15,23 168:3	wouldn't 31:23 39:16 60:22 61:1 80:13 100:15 162:11 210:19 211:9 247:25 261:5 wound 122:7,10 wrap 241:3,21 write 51:20 115:20 172:14,21 173:8 190:3 writing 29:10 36:21 85:14 108:14 164:21,25 172:20 176:9 written 1:18 3:7 3:11 10:6 13:15 14:21 15:10,23 15:24 52:13 62:9 116:8 123:4 165:7,10,13,16 173:5 195:5 230:22,22 232:18 232:20 236:7,11 246:10,20 247:11 248:2 267:25 wrong 44:8 99:1 117:13 130:3 136:10 141:6,18 141:25 150:20 156:19 159:13 170:20 171:9 181:4 222:13 227:16 233:1 wrongfully 7:23 wrongly 53:9 157:25 wrote 37:7 157:5 Wyan 181:15 182:13 202:2 205:7 206:7 210:10,18 211:5 211:11 242:22 246:5 249:11,24 Wyan's 210:5 <hr/> X <hr/> Y <hr/> Yates 158:24	159:23 yeah 129:10 238:6 240:5,10 year 24:13 122:4 178:13 200:9 202:15,16 year's 49:14 years 58:3,15 65:15,16 66:4 76:9 124:17 185:24 yellow 128:7 yesterday 1:14,17 1:21 2:25 4:19 4:22,25 5:9 24:18 25:6,11 33:12 36:14 37:14,22,24 52:7 52:18 75:3 76:16 78:8,22 94:4,21 97:16 98:22 104:16 105:14,23 109:11,14 110:5 111:15 117:10,20 118:23 123:17 124:22 126:5 127:4 132:11 142:11 143:20,22 144:3,20 159:16 163:22 182:18 184:5,6 194:7,13 197:10 198:6 202:20 203:21 211:2 222:1,2,4,7 222:8,12,13,17 <hr/> Z <hr/> Zamitt 205:7 <hr/> 0 <hr/> 07 21:7 <hr/> 1 <hr/> 1 202:23 203:11 219:8 1.40 40:9 10 20:22 25:12 52:25 53:2 70:8 107:9 189:25 273:5 274:24
--	--	--	--	--

275:10	161:16 168:20	237:5	111:24 168:20,20	346 15:6
10.00 1:3	180:12 188:3	16 160:23	168:21 171:4,5	35 17:25 18:1
10.56 173:6	201:12 209:16	16.30 248:17	234:21 256:10,11	36 32:2 64:19,21
100 90:21 177:6	219:21 220:23	17 12:14 16:3 31:5	268:3	65:3,25 67:25
11 108:7	221:19 225:12	63:11 86:6	2021 22:23 24:8,16	68:11,23 69:19
11.08 51:12	227:15,17 228:1	162:23	96:10 97:3,4	69:24 71:21 72:1
11.18 51:14	230:16 238:4	17.02 275:8	2022 24:9 115:20	72:19,20 73:8
11.56 85:22	239:24 240:17	17th 17:3,4	265:22	78:12,19 116:1
12 4:23 17:6 21:18	262:12,13,18	18 17:23 31:20	2024 1:2 275:9	173:1,7,23
27:17,23 29:25	269:18	58:3 65:1 73:2	203 107:10	193:20,24 197:15
30:9,24 71:7	13(1)(f) 38:15	136:7,23 138:22	20th 11:5 13:6,18	213:23 249:15
76:21 83:16 86:3	42:23	139:6 151:19	15:14 90:13	258:12,17
87:21 90:15 92:2	13.08 272:16	231:1 268:3	232:8,9 234:6,9	38 21:8 197:15
92:10,15 93:15	13.10 143:8	1842 129:14	234:12,17 256:2	
99:5 101:15	13.43 13:5	18th 9:23 17:2	21 104:23 137:19	4
102:24 131:1	131 238:20	87:12 101:17	138:15	4 23:6 26:7 35:10
141:7 146:16,21	13th 11:19 22:9	185:10	21st 138:12	36:25 39:8,25
174:15 175:5,15	89:11,13 101:9	19 72:25 160:23	22 32:12 115:18	56:17 58:18
180:15 181:9	136:16 139:2,9	1933 246:1	128:7 131:21	110:19 126:13
206:16 228:2	143:25 149:10	1951 129:5	228 221:14	131:17 171:3
233:14 252:10	181:21,22 182:19	196/197 210:8	22nd 34:1	4.46 41:16
12.06 93:16	189:5 210:6	197 226:19	23 123:6,11 219:9	418 15:17 16:1
12.26 218:8,8	232:4 239:13	198 226:19	272:16	18:14 86:4
12.26.52 219:5	14 5:10 7:8 28:8,13		241 246:1	439 15:18
12.28.15 219:7	47:8 272:9,9	2	26 1:2	443 13:23
12.30 5:10 32:18	14.00 143:10	2 18:15 19:20 21:1	26.5 135:14	47 200:25
48:13	14.46 170:18	56:9 87:8 88:6	26.6 135:14	4754 44:22
12.31 113:3	14th 89:18 91:6	88:19 211:21	260 248:21	4796 41:14
12.45 5:10 190:21	139:9,11 149:2,6	20 13:2,22 32:16	261 250:15	48 200:25
12.53 272:10	15 7:18 8:18 9:4,17	66:4 90:6,9	2613 152:20	4818 47:2
1245 6:8,12	9:19 10:9 29:14	104:24 143:2	27 91:13	4th 26:24 37:10,12
1253 6:5,8	104:18 135:21	149:16 158:23	270 228:15,17	40:4,6
12th 11:21 29:20	136:8,9,12	160:12 232:2	271 228:15	
133:20 144:11	147:25 149:25	233:7 234:3	277 207:22	5
148:13 155:14	210:9 228:12	2009 63:20	28 85:12	5 1:17 36:4,12 37:9
156:5,17,19	230:15,19 242:14	2012 60:24	29 34:19,20 44:15	37:21 39:18 40:6
177:19,21 188:10	268:3 273:18	2016 60:17	45:10,15 113:6	40:9,18 41:16
206:23 222:6	15-minute 273:2	2017 121:16 122:4	115:16 123:13	46:17 47:5 51:20
233:20	15.00 189:8	165:21		53:20,23 54:19
13 2:20 3:25 16:9	15.28 212:11	2018 58:10,12,13	3	61:11 107:21
27:9 41:24,25	15.38 212:13	121:17 122:5	3 45:21 56:16	114:13,18 116:13
42:11 43:2 86:12	15.56 224:19	2019 58:12,14 63:9	94:23 165:20	116:19,22 131:3
97:22 100:1,2,11	15th 7:4,5 13:14	63:21 64:15	203:13	131:5,16 136:17
100:18 101:5,11	89:22 91:5 101:7	66:17	3.32 2:21	136:18 212:20
103:9 114:14,21	101:19 136:11	2020 17:24 31:5	30 275:9	267:20 268:12
117:11 140:4	137:2 138:5	34:21 41:16	31(7) 61:17	5.30 35:11
143:14,16 149:16	139:12 149:8,13	51:20 55:2,8	313 106:1	53 21:11
156:22 158:4	151:15 210:6	69:11,16,18	32 47:13	535 150:4
160:25 161:11,13	225:3 232:6,12	74:22 105:4	34 27:9 40:23	54 21:11 37:21
		107:22 108:8	41:22	55 91:17

<p>5647 247:18 58.29 21:11 59 18:7 21:1 56:2,5 56:25 57:4 61:9 199:23 59(2) 162:25 59(2)(b) 18:8,22 19:16 22:15 86:14 179:24 180:6 59(2)(c) 21:5 22:15 5th 40:4</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 46:14,15,21 69:11,15,17 70:9 70:15 104:22 111:11 197:9 210:3 261:13,15 6(a) 25:14,19 6(b) 130:23 6.39 2:23 6.48 2:24 610 203:4,12 62 267:25 64.8 145:7,9 6793 129:23 6th 203:11</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 24:15,20 48:13 76:20 107:10 109:25 110:17,21 111:5,23 112:12 117:19,21 124:23 125:19 131:14 145:3 168:19,20 171:4 175:14 205:22 221:8 223:6 259:10,20 260:10 261:1,6 261:15,16,22 262:7 7.29 9:5 732 107:19 761 16:17 763 18:6 22:12 7th 147:14</p> <hr/> <p style="text-align: center;">8</p> <hr/>	<p>8 24:8 25:12 49:6 96:9 97:3 197:12 197:25 198:4 203:18 808 197:7 817 151:2 82 70:8 871 22:22 883 13:1 884 89:7 90:7 8th 203:9</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 4:21 138:2 198:2 9.35 24:24 9.49 28:13</p>			
---	---	--	--	--