

<p>1 (Wednesday, 8 May 2024) 2 (10.00) 3 MR SANTOS: Good morning, sir. Our next 4 witness is the former Deputy Governor, Mr 5 Nick Pyle, OBE. 6 NICHOLAS PYLE, sworn 7 Questioned by MR SANTOS 8 Q. Good morning Mr Pyle. 9 <b>A. Good morning.</b> 10 Q. First and foremost, can we just deal with 11 your witness statements? You should have a 12 bundle in front of you marked "Witness 13 Statements." Behind the first tab should be 14 your first affidavit to this inquiry. Can I ask 15 you to please check that that is your affidavit, 16 your first affidavit, and that your signature is 17 on the final page, please? 18 <b>A. It is.</b> 19 Q. And do you confirm that the contents of 20 that affidavit are true to the best of your 21 knowledge, information and belief? 22 <b>A. They are.</b> 23 Q. And can we now move to behind the 24 second tab, please. That should be your 25 second affidavit to this inquiry. Can I ask</p> <p style="text-align: center;">Page 1</p>	<p>1 <b>Governor. The role I saw it was to support</b> 2 <b>Lieutenant General Davis in him carrying out</b> 3 <b>his constitutional and other duties. There is</b> 4 <b>also the link and the bridge work and the soft</b> 5 <b>power work but if I can sum-up quite</b> 6 <b>succinctly, I saw my role as ensuring that</b> 7 <b>HMG did nothing to embarrass Gibraltar and</b> 8 <b>Gibraltar did nothing to embarrass HMG.</b> 9 <b>Lieutenant General Davis and I worked very</b> 10 <b>closely and collegiately. We were mutually</b> 11 <b>supportive. I would step up and support him</b> 12 <b>and he would step down and support me, and</b> 13 <b>we very quickly agreed that it was important</b> 14 <b>that I establish good relationships with</b> 15 <b>everybody from the Chief Minister</b> 16 <b>downwards, not least so I could act in his</b> 17 <b>absence with credibility and knowing who</b> 18 <b>the players were, so to speak.</b> 19 Q. During that period, as you alluded to, I 20 understand that you served as what is 21 commonly referred to as Acting Governor, 22 that is under section 23 of the Constitution, 23 for short periods while the Governor was 24 absent from Gibraltar. Is that correct? 25 <b>A. It is, and it happened quite frequently.</b></p> <p style="text-align: center;">Page 3</p>
<p>1 you to please check that it is and that your 2 signature is on the final page, please? 3 <b>A. It is.</b> 4 Q. And do you confirm that the contents of 5 that affidavit are true to the best of your 6 knowledge, information and belief? 7 <b>A. I do.</b> 8 Q. Thank you. Mr Pyle, you have held the 9 office of Deputy Governor from when you 10 first arrived in Gibraltar in September 2016 11 up until August 2022. Is that correct? 12 <b>A. That's correct.</b> 13 Q. And the Governor during that time was 14 first of all Lieutenant General Ed Davis 15 followed by Sir David Steel. Is that correct? 16 <b>A. Correct.</b> 17 Q. Can you please tell us about the 18 relationship between the Deputy Governor 19 and the Governor and how those roles 20 worked together in practice? 21 <b>A. So, like many roles, it depends on the</b> 22 <b>Governor. Ed Davis arrived with the task</b> 23 <b>that I was given, which was in effect to help</b> 24 <b>repair the relationship that had been strained</b> 25 <b>with the early departure of the former</b></p> <p style="text-align: center;">Page 2</p>	<p>1 <b>One of the first challenges I had was as</b> 2 <b>Acting Governor when the Spanish</b> 3 <b>Environmental Agency sent its vessel into</b> 4 <b>BGTW and tried to drop a sonar. I think that</b> 5 <b>was November 2017 --</b> 6 Q. Am I correct - do go on. 7 <b>A. Sorry, do correct me. I think it was</b> 8 <b>November 2016.</b> 9 Q. Yes. No, no, I was not going to correct 10 you. I was just going to ask you to confirm 11 that during the incident on the airport runway 12 in February/March and the arrests following 13 that in February March 2017, for some of 14 that time you were Acting Governor? 15 <b>A. Yes, that's correct and before the</b> 16 <b>Governor left on leave he briefed me on -</b> 17 <b>which is what we used to do. I would get</b> 18 <b>briefed by the Governor on issues on his</b> 19 <b>mind before he departed and I would give</b> 20 <b>him a brief, obviously, on his return of what</b> 21 <b>had gone on while he was away.</b> 22 Q. You also served as Governor under 23 section 22 of the Constitution, commonly 24 referred to as the Interim Governor while that 25 office was vacant between governors from</p> <p style="text-align: center;">Page 4</p>

<p>1 February to June 2020. Is that correct?</p> <p>2 <b>A. Correct.</b></p> <p>3 Q. Were you a member of the Gibraltar</p> <p>4 Police Authority throughout your time as</p> <p>5 Deputy Governor?</p> <p>6 <b>A. No, I think as my evidence shows, I</b></p> <p>7 <b>emailed Dr Britto quite early on, probably</b></p> <p>8 <b>after the first day, in effect recusing myself</b></p> <p>9 <b>from involvement with the GPA.</b></p> <p>10 Q. I am going to take you to that email</p> <p>11 imminently but just before I ask that, apart</p> <p>12 from that period of time when you were</p> <p>13 acting as Interim Governor, were you on the</p> <p>14 GPA otherwise?</p> <p>15 <b>A. Yes, I was, and occasionally as Acting</b></p> <p>16 <b>Governor, I would attend a GPA meeting,</b></p> <p>17 <b>declare the interest that I was Acting</b></p> <p>18 <b>Governor and offer that if that caused any</b></p> <p>19 <b>issues I would recuse myself from the</b></p> <p>20 <b>meeting.</b></p> <p>21 Q. If we can go first of all to B1 961, now</p> <p>22 you should have a file in front of you that</p> <p>23 will have all of these documents, hopefully,</p> <p>24 in hard copy but they will also be on screen,</p> <p>25 so it's up to you whether you prefer to look</p> <p style="text-align: center;">Page 5</p>	<p>1 objection to my attendance should be enough</p> <p>2 to preclude it. This gives the GPA a say in</p> <p>3 how it operates." Why did you feel it</p> <p>4 appropriate to make that suggestion to Dr</p> <p>5 Britto[?]?</p> <p>6 <b>A. I saw my role as the Governor's sort of</b></p> <p>7 <b>representative on the GPA in a slightly</b></p> <p>8 <b>different way than had happened previously.</b></p> <p>9 <b>Until that extent with the then Chief</b></p> <p>10 <b>Secretary, Ernest Gomez, I drafted a note</b></p> <p>11 <b>which I sent to the Chair of the GPA</b></p> <p>12 <b>explaining that I saw myself as the</b></p> <p>13 <b>Governor's representative and therefore I</b></p> <p>14 <b>would obviously brief him on GPA issues</b></p> <p>15 <b>and bring any concerns he had to GPA</b></p> <p>16 <b>meetings as necessary and as appropriate.</b></p> <p>17 <b>So, I think it was meant in that type of open</b></p> <p>18 <b>collegiate helpful way that I've always</b></p> <p>19 <b>operated.</b></p> <p>20 Q. Is it correct that after this point you did</p> <p>21 not attend any GPA meetings while you were</p> <p>22 Interim Governor?</p> <p>23 <b>A. That is correct.</b></p> <p>24 Q. Did you stay in contact with Dr Britto on</p> <p>25 GPA matters?</p> <p style="text-align: center;">Page 7</p>
<p>1 on screen or -</p> <p>2 <b>A. I am happy to look at the screen.</b></p> <p>3 Q. If there is any document you would like</p> <p>4 to read more of, just let us know.</p> <p>5 <b>A. Sure.</b></p> <p>6 Q. And I am told you might want to move</p> <p>7 the microphone down a little just to make</p> <p>8 sure that -</p> <p>9 THE CHAIRMAN: Or move it just a bit</p> <p>10 closer to you. The base of the thing will</p> <p>11 move, probably. Okay, great.</p> <p>12 MR SANTOS: Thank you. This is an email</p> <p>13 dated 9 February 2020 from you to the Chair</p> <p>14 of the GPA where you say, "Joey, I was</p> <p>15 thinking about the best way forward in terms</p> <p>16 of maintaining or not my role of interest in</p> <p>17 the GPA as Governor and have a suggestion</p> <p>18 for you. Why don't you send an email to all</p> <p>19 the GPA members save me stating that for as</p> <p>20 long as I am Governor, you intend to omit</p> <p>21 me from general GPA correspondence etc.</p> <p>22 but that I have offered to continue to attend</p> <p>23 GPA meetings recusing myself as necessary</p> <p>24 or at anyone's request. I'd put it as a</p> <p>25 suggestion and ask for their views. One</p> <p style="text-align: center;">Page 6</p>	<p>1 <b>A. I don't believe I did.</b></p> <p>2 Q. Other than, obviously, the section 34</p> <p>3 process?</p> <p>4 <b>A. Correct.</b></p> <p>5 Q. Is it correct to say that under section</p> <p>6 471(c) of the Constitution and section 11 of</p> <p>7 The Police Act, the Governor is responsible</p> <p>8 for internal security, including the police?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And the GPA's independence in its</p> <p>11 functions is guaranteed by section 48 of the</p> <p>12 Constitution?</p> <p>13 <b>A. Correct.</b></p> <p>14 Q. And finally, under section 49, you are</p> <p>15 required to keep the Chief Minister fully</p> <p>16 informed concerning the general conduct of</p> <p>17 matters for which you are responsible,</p> <p>18 including internal security and police? Do</p> <p>19 you accept that?</p> <p>20 <b>A. Correct, yes.</b></p> <p>21 Q. There is a similar provision in section</p> <p>22 13(2) of the Police Act. What do you</p> <p>23 understand keeping the Chief Minister</p> <p>24 informed to entail?</p> <p>25 <b>A. I think exactly what it states, that the</b></p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

1 **Chief Minister and I, when we had our**  
 2 **meetings, would occasionally move on to**  
 3 **matters relating to policing.**  
 4 Q. Would you agree that those provisions do  
 5 not permit the Chief Minister to make  
 6 decisions about areas for which the Governor  
 7 is responsible?  
 8 **A. He cannot make decisions but of course**  
 9 **he would have an informed decision by**  
 10 **consulting those other stakeholders.**  
 11 Q. Would he be in your view permitted to  
 12 persuade or influence a governor to make a  
 13 particular decision?  
 14 **A. Never.**  
 15 Q. If we now go to A245, please, this is your  
 16 first witness statement at paragraph 20.1.  
 17 You have the whole witness statement in  
 18 front of you, again, if you want to see it in  
 19 hard copy, but it should appear on the screen.  
 20 I just want to focus on paragraph 20.1 -  
 21 sorry, 20 first of all. "My loss of confidence  
 22 in Mr McGrail. ". As I have already stated,  
 23 my loss of confidence in Mr McGrail's  
 24 probity and integrity, and his leadership of  
 25 the RGP had been progressive over a period

Page 9

1 of time and by reason of a number of  
 2 incidents and matters, which I now explain.  
 3 They began early on after my arrival in  
 4 Gibraltar." Was the airfield incident, which  
 5 you refer to, the earliest incident that caused  
 6 you to lose confidence in Mr McGrail?  
 7 **A. Yes.**  
 8 Q. If we go to C4676 now, please, this is  
 9 your letter to the GPA on 3 June 2020. If we  
 10 can just look at the previous page, perhaps,  
 11 just to show you the first page of the letter,  
 12 and then at 4676 you say - the second  
 13 paragraph I want to read to you: "My deep  
 14 concerns with the COP's leadership qualities  
 15 have absolutely nothing to do with that  
 16 investigation", so the Op Delhi investigation.  
 17 "The already existing concerns that I have  
 18 had with the COP were confirmed by the  
 19 incident at sea and the HMIC report." Can  
 20 you briefly summarise what your already  
 21 existing concerns that you are referring to  
 22 there were?  
 23 **A. That was starting with the airfield**  
 24 **incident. There is what I refer to as the**  
 25 **helicopter incident and then there is the**

Page 10

1 **various reporting social media, media and**  
 2 **newspapers about concerns people had over**  
 3 **the RGP, whether there were listening**  
 4 **devices - I think I referred to that in my**  
 5 **statement, that there was - I called it**  
 6 **anecdotal, which I did not feel strong enough**  
 7 **to explore or investigate but nevertheless**  
 8 **caused some concern.**  
 9 Q. Would you describe your loss of  
 10 confidence as progressive but tolerable until  
 11 May 2020?  
 12 **A. I think I had deep concerns. Loss of**  
 13 **confidence would possibly not have**  
 14 **happened without the incident at sea.**  
 15 Q. What would you say was the event that  
 16 spurred you to act as you did in May 2020?  
 17 **A. Unequivocally the incident at sea.**  
 18 Q. Can we go to now an email that we  
 19 received on 8 March 2024 from Caruana &  
 20 Co? This is not in the bundle but it should  
 21 appear on the screen. This is to do with your  
 22 WhatsApps and disclosure of WhatsApps. I  
 23 just want to read the second paragraph there  
 24 where your lawyers say, "In respect of Nick  
 25 Pyle, we can confirm that he does not have

Page 11

1 access to any relevant WhatsApps. Such  
 2 WhatsApps as he has referred to in his  
 3 affidavit have been obtained by him from the  
 4 document entitled, "Timeline of  
 5 Communications between COP and officials"  
 6 appended to Ian McGrail's section 15 report."  
 7 Why do you not have any access to any  
 8 relevant WhatsApps?  
 9 **A. Mainly because I followed FCO policy**  
 10 **on doing work over WhatsApp and I believe**  
 11 **I provided a copy of that. We call it**  
 12 **guidance. A guidance in Foreign Office**  
 13 **language is an instruction of how to use**  
 14 **social media in doing our work. I can briefly**  
 15 **tell you what that was if it would be helpful.**  
 16 Q. I think it would be yes, thank you.  
 17 **A. So, the guidance was simply that if you**  
 18 **did any work of any sensitive nature, or**  
 19 **indeed any nature at all, you had to transcribe**  
 20 **it on to a note or into a diary and then at**  
 21 **some stage save it as a Word file or**  
 22 **something else and then delete the**  
 23 **WhatsApps, so I regularly deleted my**  
 24 **WhatsApps.**  
 25 THE CHAIRMAN: Mr Pyle, I missed a bit

Page 12

<p>1 about what you said about WhatsApps. You 2 are speaking very quickly. 3 <b>A. Okay, I apologise.</b> 4 THE CHAIRMAN: You transcribe it as a 5 note and save it as a Word document? 6 <b>A. Yes, you need to find some way of 7 recording.</b> 8 THE CHAIRMAN: It's the next bit I didn't 9 catch. 10 <b>A. And then the WhatsApp had to be 11 destroyed or deleted.</b> 12 THE CHAIRMAN: Okay. 13 MR SANTOS: Have those notes that record 14 what was in your WhatsApps been disclosed 15 to the inquiry? 16 <b>A. No, because when I left my office, I think 17 most of my documentation was destroyed, 18 but they would be incorporated into the 19 emails and the reporting I sent to London.</b> 20 Q. Have you requested those notes, access to 21 those notes from - 22 <b>A. No, the notes would have been mine but 23 my point is, and I can evidence this - I keep 24 my black book and when I transcribe my 25 note into a report to London, I take the note</b></p> <p style="text-align: center;">Page 13</p>	<p>1 individual and surrendered him to the RGP. 2 These events naturally became public and 3 caused considerable consternation given the 4 close and friendly nature of the constitutional 5 relationship between the UK and Gibraltar, 6 and indeed the very friendly relations that 7 have always existed between the MOD and 8 Gibraltar." Are you aware that the RGP 9 officers who blockaded the runway were 10 acting on the orders of Commissioner of 11 Police Yome? 12 <b>A. Yes, I was.</b> 13 Q. Do you nevertheless consider that Mr 14 McGrail was responsible for the actions of 15 the RGP that day? 16 <b>A. No, he would not have been although he 17 was involved, and my point, and I apologise 18 if I did not make it as clear as I should have, 19 was more about the arrests and the 20 subsequent action than the actual incident 21 and the blocking of the plane from taking off.</b> 22 Q. But turning to the arrests, you deal with 23 them at 21.5. "On 1 March, the RGP arrested 24 three of the most senior MOD members of 25 staff in Gibraltar on suspicion of conspiracy</p> <p style="text-align: center;">Page 15</p>
<p>1 <b>page out and then I destroy that note to 2 ensure -</b> 3 Q. So, when you say that those notes would 4 have been destroyed, you mean you would 5 have destroyed the notes? 6 <b>A. Yes, I would have destroyed the notes, 7 yes. I have to say that that is best practice in 8 FCO methodology.</b> 9 Q. Can we now turn to the airport incident, 10 please? If we can look first of all at your 11 witness statement at paragraph 21.1, you 12 refer to it as the airfield incident, but I don't 13 think we are in any confusion as to what we 14 are referring to. You say, "My concerns over 15 the leadership and management of the RGP, 16 and over the behaviour and judgment of Mr 17 McGrail as its Commissioner of Police, 18 started with what I call the Airfield Incident 19 which happened on 8 February 2017, five 20 months after my arrival in Gibraltar. I was 21 Acting Governor at the time of the incident." 22 And then if we can skip ahead, you refer to 23 an investigation by Leicestershire Police and 24 then at 21.4, please, "After a period of 25 standoff, the MOD relented, disembarked the</p> <p style="text-align: center;">Page 14</p>	<p>1 to pervert the course of justice. Those 2 arrested were: the Chief of Staff, British 3 Forces Gibraltar, Colonel Frank Green; 4 Station Commander Wing Commander Liz 5 Hutchison; and Squadron Leader Provost 6 Marshall Chris Collins in connection with 7 this incident. One of them, the Provost 8 Marshal, was, with quite unnecessary drama, 9 removed from a civilian, commercial flight 10 from the UK as soon as it landed in Gibraltar. 11 Colonel Green was arrested in front of his 12 superior, the Commander of British Forces 13 Gibraltar, Commodore Mike Walliker. 14 Station Commander Hutchison was arrested 15 in front of her team at RAF Gibraltar Station 16 Headquarters. The manner of the arrests were 17 unpleasant." Just before I ask you any 18 questions, Mr McGrail responds about this at 19 A152, which is his fifth witness statement at 20 paragraph 29. He says in paragraph 21.5, 21 "NP claims that the Provost Marshall was 22 with quite unnecessary drama removed from 23 a civilian commercial flight from the UK as 24 soon as it landed in Gibraltar. This statement 25 is also incorrect. No RGP officer stepped on</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 to the airfield tarmac or boarded any civilian 2 aircraft. The individual in question, Mr 3 Collins, disembarked of his own accord with 4 the rest of the passengers. He was met by 5 RGP officers at the baggage collection area 6 and arrested there. There was no 7 unnecessary drama caused as has been 8 claimed, quite the opposite. My 9 understanding is that the officers were very 10 discreet and accommodating in their 11 approach. In fact, Mr Collins was permitted 12 to greet his family who were waiting for him 13 at the arrivals hall. Mr Collins was treated 14 with due courtesy and respect, and I 15 understand he thanked the RGP officers for 16 allowing him to see his family." Do you 17 accept Mr McGrail's account in that 18 paragraph? 19 <b>A. I do in part and when I said that he was 20 arrested in effect off the plane, he was 21 arrested two minutes later in front of 22 everybody else from the plane and in a 23 baggage hall.</b> 24 Q. Do you nevertheless maintain that he was 25 arrested with unnecessary drama?</p> <p style="text-align: center;">Page 17</p>	<p>1 <b>the wrong call.</b> 2 Q. Is your issue with the arrests themselves 3 or the manner of them? 4 <b>A. Well, I can't argue against the arrests 5 because they have the right to do so, so it is 6 the manner and if you would - there's a tiny 7 bit of background to the incident, because I 8 was Acting Governor at the time. One of the 9 roles I have as Deputy Governor, as well as 10 being on the Gibraltar Police Authority, is 11 the Judicial Services Commission and the 12 Specified Appointments Commission. As I 13 said, the Governor had briefed me on the 14 issue of the suspect being on Gibraltar and I 15 was in an interview and I got a call - and I'd 16 left my phone in the car, because when I 17 interview it's quite right that nobody's 18 disrupted - by somebody from HR who said 19 the Chief Minister wanted to speak to me 20 urgently. I suggested it wait until I'd finished 21 that interview. Five minutes later, I got 22 another interruption and I apologised to the 23 candidate and took the call and had a 24 discussion with the Chief Minister and I 25 agreed to see him probably, I think, in about</b></p> <p style="text-align: center;">Page 19</p>
<p>1 <b>A. I think that was an expression told to me 2 at the time, whether it was by Mr Collins or 3 one of the other people, CBF, I don't know, 4 but that was certainly the impression I got 5 from MOD at the time.</b> 6 Q. Mr Goncalvez, who was the Chairman of 7 the GPA at the time, has given evidence to 8 the inquiry that he was not surprised to learn 9 of the arrests as, he put it, no one is above the 10 law. What is your reaction to that? 11 <b>A. I still find it quite incredible to this day 12 that two weeks after an event which nearly 13 caused a rupture in the relationship between 14 Gibraltar and the MOD/UK after the issue of 15 jurisdiction had been resolved, that two-and- 16 a-half weeks later a decision was taken to 17 arrest three senior military people when I'd 18 have thought the opposite should be 19 happening and steps are being taken to 20 ensure that this wouldn't happen again.</b> 21 Q. Are the RGP not entitled to make their 22 own operational decisions as to the conduct 23 of arrests? 24 <b>A. Absolutely. I don't know if anybody was 25 suggesting otherwise. I just think that was</b></p> <p style="text-align: center;">Page 18</p>	<p>1 <b>an hour's time, and I quickly rang the Foreign 2 Office just to ask them to check that the 3 MOD legal position was one with which they 4 agreed. By the time I got to the Chief 5 Minister's office, the Foreign Office had told 6 me that yes, it was indeed their position that 7 the MOD had jurisdiction so I stood my 8 ground a bit in a difficult conversation with 9 the Chief Minister which, as an aside, I think 10 helped to establish our working relationship 11 that we could have difficult conversations in 12 the right way, and I remember waking up the 13 next morning to an email from the FCO 14 saying, "Oops, we've got that wrong." I then 15 had to go and see the Chief Minister and 16 apologise that yes, indeed, HMG now accept 17 that it was Gibraltar's jurisdiction.</b> 18 Q. But if the RGP had reason to suspect that 19 these individuals had perverted the course of 20 justice, do you maintain that they 21 nevertheless should not have arrested them? 22 <b>A. I think there is another way to address 23 that issue. I believe there was a dinner at the 24 Convent hosted by the Governor with the 25 Chief Minister, CBF and Commissioner of</b></p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 <b>Police Yome when the suggestion that three</b>  2 <b>senior officers would present themselves for</b>  3 <b>questioning at New Mole House was made.</b>  4 Q. If we turn to Mr McGrail's third affidavit,  5 paragraph 148A, that is at A120, please, I  6 just want to pick up from just before halfway  7 down on that last paragraph at the bottom of  8 the page where he says, "I did not deal with  9 NP on the matter". Can you see that?  10 <b>A. Yes.</b>  11 Q. "I did not deal with NP on the matter but  12 I know my predecessor did and was  13 unsuccessful in diffusing attention because of  14 some very entrenched positions. I distinctly  15 recall senior counsel for the Crown in  16 Gibraltar, Ricky Rhoda QC, who was  17 possibly Acting AG at the time and who  18 incidentally supported the RGP's position  19 advising NP on the matter, and NP still  20 opting for UK FCO legal advice, which was  21 not necessarily in concert with the AG's. It is  22 my strong view that NP's inert activity during  23 this dilemma was a contributory factor to the  24 unfortunate escalation of events which  25 attracted a lot of adverse interest from the</p> <p style="text-align: center;">Page 21</p>	<p>1 <b>in the Convent as Acting Governor with</b>  2 <b>Commissioner Yome and Chief of Staff</b>  3 <b>Frank Green. I remember very clearly sitting</b>  4 <b>in the room waiting for Colonel Green to</b>  5 <b>arrive and he didn't, unfortunately.</b>  6 Q. Given the role that Mr McGrail alleges  7 you played in the airport incident or didn't  8 play there, I suppose is a fairer way of  9 putting it, is it fair for you to rely on this  10 nevertheless as a factor contributing to your  11 loss of confidence in him?  12 <b>A. As I said, I think the loss of confidence</b>  13 <b>came from the incident at sea, and that's the</b>  14 <b>only incident or issue that really fixed in my</b>  15 <b>mind as in its own right would lead me to a</b>  16 <b>loss of confidence. The others when I looked</b>  17 <b>at the incident at sea and I reflected back, I</b>  18 <b>did see this pattern of behaviours that I</b>  19 <b>thought were sometimes not appropriate.</b>  20 <b>Within that, there were many good elements</b>  21 <b>of the work that the RGP have and are doing,</b>  22 <b>including its leadership, whether that, as said</b>  23 <b>before is Grace 1 or their work on the Covid</b>  24 <b>pandemic.</b>  25 Q. Can I ask you to turn to C260 now,</p> <p style="text-align: center;">Page 23</p>
<p>1 local international media and caused a  2 serious fracture in the relationships between  3 HMGOG and the MOD which was only  4 resolved after the intervention of the current  5 Chief of Defence Staff, Admiral Sir Anthony  6 David Radakin and in which coincidentally  7 Mr Gomez acted for the principal military  8 officers in Gibraltar at the time." Do you  9 accept what Mr McGrail - well, how do you  10 respond to that criticism from Mr McGrail?  11 <b>A. I think I would probably refer everybody</b>  12 <b>to the statement made by Lieutenant General</b>  13 <b>Ed Davis, that said that he and I worked quite</b>  14 <b>hard, quite tirelessly, were in regular contact,</b>  15 <b>which is another point about how the</b>  16 <b>relationship between the Governor and</b>  17 <b>Deputy Governor - he was Acting Governor</b>  18 <b>- certainly with General Davis. When</b>  19 <b>everybody's away, we were in regular</b>  20 <b>contact. For somebody in that position,</b>  21 <b>there's no such thing as a holiday. Inert</b>  22 <b>activity is an interesting description of me</b>  23 <b>which I've never heard of before, but I</b>  24 <b>worked quite hard and I think in my second</b>  25 <b>statement, mentioned a meeting I had called</b></p> <p style="text-align: center;">Page 22</p>	<p>1 please? Well, you do not have to turn to it; it  2 should appear on screen. This is a letter from  3 Rear Admiral Radakin dated 8 March 2017  4 and I just want to show you a couple of  5 passages from that. first of all, at the bottom  6 of C260, the penultimate paragraph, he says,  7 "Joint Forces Command regret the events that  8 took place in Gibraltar on 8 February. This  9 includes the events at Gibraltar International  10 Airport and the dispute as to jurisdiction that  11 led to the confusion by British Forces  12 Gibraltar over the appropriate handling of the  13 individual suspected of downloading  14 indecent material whilst in the United  15 Kingdom and the detailed management of  16 this particular case." Then over the page, and  17 a little bit lower down, the very large  18 paragraph - I am taking it from halfway  19 down again: "It is in seeking to implement  20 this approach that unfortunately personnel  21 from British Forces Gibraltar had were  22 clearly unfortunate altercations with officers  23 of the Royal Gibraltar Police who were  24 acting in the lawful execution of their duties.  25 I cannot emphasise to you how much we</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 regret, with the benefit of hindsight and the 2 later legal advice we have received, that we 3 were not better able to cooperate with those 4 of your officers in question. These 5 altercations should not have happened and 6 any active disagreement as to jurisdiction 7 should in any event have been handled in the 8 more dignified and usual manner for issues 9 of this type. I must express to you in 10 particular our genuine regret to hear 11 accusations of British Forces Gibraltar 12 personnel behaved disrespectfully towards 13 officers of the Royal Gibraltar Police and that 14 they were inconsiderate of the requirements 15 under which your officers were seeking to 16 undertake their lawful activities and 17 investigations. That is not in the nature of the 18 relationship we have long enjoyed between 19 our organisations." That is on 8 March, so 20 some seven days after the arrests. I do not 21 have to take you there but there is also an 22 apology from Squadron Leader Chris Collins 23 and from Wing Commander Hutchison. Do 24 you nevertheless maintain that it was Mr 25 McGrail who was to blame for the fallout</p> <p style="text-align: center;">Page 25</p>	<p>1 that correct? 2 <b>A. Correct.</b> 3 Q. Do you agree that Sir Alan and the high 4 ranks of the FCDO seem to hold a positive 5 view of how the incident was resolved? 6 <b>A. I think what they are saying is they are 7 happy to have reached a good outcome. It 8 doesn't mean that they're happy with how we 9 got there. This is diplomacy. This is our 10 trade craft. This is how we get over events 11 and reset relationships to start again.</b> 12 Q. Did you communicate your concerns 13 about the incident to the FCO? 14 <b>A. Yes, I did.</b> 15 Q. If we can now go to C207, please, this is 16 an email of 3 March 2017 from the Chief 17 Minister to the then Commissioner of Police 18 and the Attorney General, and it is on 3 19 March, so two days after the arrests where he 20 says, "Eddie, Michael, I've now read this and 21 Michael's response. My impression and clear 22 understanding is that MOD have now fully 23 understood the position and the nonsense and 24 bravado being displayed by fools such as 25 those you refer to below. In fact, this</p> <p style="text-align: center;">Page 27</p>
<p>1 from this incident? 2 <b>A. No, there was clearly fault on both sides. 3 All I have seen are apologies from the MOD 4 side. To this day I have still not seen any 5 apology for any actions by the Royal 6 Gibraltar Police, which I've heard 7 accusations about, so Tony Radakin here 8 said, "Regret to hear accusations." Those 9 accusations must have come Gibraltar. 10 Accusations were put by MOD not least in 11 the complaint to the Police Complaints 12 Board. I've heard those as well.</b> 13 Q. If we can go to C291, please, at the 14 bottom of that page, 9 March 2017, there is 15 an email from a contact at the FCO to the 16 Chief Minister and it says, "Dear Chief 17 Minister, I just want to update Sir Alan 18 Duncan on the latest situation in relation to 19 the events of 8 February and beyond. The 20 Minister was very happy that we appeared to 21 have reached a good outcome. He asked me 22 to pass on his personal gratitude to you and 23 the Commissioner of Police for helping us 24 get to this point." Sir Alan Duncan was, I 25 believe, Minister for Europe at the time. Is</p> <p style="text-align: center;">Page 26</p>	<p>1 illustrates why and how we have found 2 ourselves in this unnecessary and unpleasant 3 situation. If it requires another turn of the 4 screw, which I will not hesitate to support 5 you in, it will once again have been brought 6 about by those who fail to recognise the need 7 to show proper and genuine contrition and 8 respect for the RGP and for our Constitution. 9 Failing to respect our Constitution is not to 10 fail to respect just Gibraltar. It is to fail to 11 respect the UK Parliament and the same 12 monarch that these clowns in uniform have 13 sworn an oath to." And then just skipping 14 over one paragraph: "I can tell you that the 15 Minister for Europe and the Governor would 16 not be impressed at all if I shared this with 17 them, which I will not do. I can also tell you 18 that Gibraltar will not be home for the people 19 in question for long and they won't be 20 blocking the tarmac for a moment to delay 21 the plane when the time soon comes for them 22 to wave goodbye to the best place these 23 idiots have ever had the good fortune to live 24 in their petty lives. Good riddance and 25 goodbye won't come soon enough. I can tell</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 you one thing, Eddie. Gibraltar, it's Chief                  2 Minister, its government and its people are                  3 proud of their police and the SNT                  4 Commissioner and their Attorney General.                  5 The UK as a whole conversely has been                  6 embarrassed by its senior ranks on the Rock                  7 and can be seen by the reports in the                  8 newspapers of the actions taken here. I                  9 would rather be in your shoes than theirs".                  10 Do you agree with the Chief Minister's                  11 reaction to the events of 1 March and 8                  12 February 2017?                  13 <b>A. No, I don't.</b>                  14 Q. Do you think that the sentiments                  15 expressed in that email were conducive to a                  16 good relationship between the government                  17 and the MOD?                  18 <b>A. It would not be and indeed I think it took</b>                  19 <b>a lot longer for the relationship to fully repair</b>                  20 <b>and get back to where it was. I suggest it</b>                  21 <b>took a good six to 12 months.</b>                  22 Q. When he says in the middle of the                  23 paragraph, "I can tell you that the Minister                  24 for Europe and the Governor would not be                  25 impressed at all if I shared this with them",</p> <p style="text-align: center;">Page 29</p>	<p>1 exonerated the RGP. The GPA methodology                  2 however was in my opinion seriously flawed,                  3 not least as they did not conduct any                  4 interviews with MoD nor seek any                  5 information from them." These concerns that                  6 you said that you raised with the GPA as to                  7 Mr McGrail's behaviours, what behaviours of                  8 Mr McGrail did you raise with those parties?                  9 <b>A. So, I was informed by not just Colonel</b>                  10 <b>Frank Green but people who were in the</b>                  11 <b>tower at the same time and the CBF that Mr</b>                  12 <b>McGrail was just a bit aggressive - I think</b>                  13 <b>that's the word I would use to sum it up. The</b>                  14 <b>cross between Sweeney and Life on Mars</b>                  15 <b>came from one of the senior MOD people.</b>                  16 <b>That's exactly how they described their</b>                  17 <b>actions to me. I have no reason to doubt, and</b>                  18 <b>I was reflecting what I was told by MOD</b>                  19 <b>senior officials.</b>                  20 Q. You say you raised these concerns with                  21 the GPA. Did you do so verbally or in                  22 writing?                  23 <b>A. No, I accept that I used the word</b>                  24 <b>"formally" quite often. They were raised in a</b>                  25 <b>formal setting but not in writing, and outside</b></p> <p style="text-align: center;">Page 31</p>
<p>1 do you know what is being referred to by the                  2 Chief Minister there?                  3 <b>A. Well, I assume the tone and content of</b>                  4 <b>the letter. We all have different audiences</b>                  5 <b>and this is very clearly a letter from the Chief</b>                  6 <b>Minister or a note, internal for the RGP. It's</b>                  7 <b>not the language he would use writing to the</b>                  8 <b>Minister for Europe about the issue.</b>                  9 Q. Then can we go to A247, please? This is                  10 your witness statement again, paragraph                  11 21.7: "I raised my concerns over the RGP's                  12 above behaviours, and in particular Mr                  13 McGrail's formally on numerous occasions                  14 with the Gibraltar Police Authority, the                  15 Governor, the Chief Minister and with the                  16 Foreign Commonwealth and Development                  17 Office. Some of the actions and behaviours                  18 were described to me by senior MoD people                  19 as a cross between the Sweeney and Life on                  20 Mars, and extremely and unnecessarily                  21 discourteous. I pushed hard for a review (not                  22 an inquiry) into the incident to expose the                  23 RGP behaviours. This was accepted by the                  24 Chief Minister who tasked the GPA to                  25 conduct their own review. Their report</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>of that I do stand by what I say in my</b>                  2 <b>statement.</b>                  3 Q. Do you have any written record of that?                  4 Sorry, you said you had expressed not in                  5 writing.                  6 <b>A. No.</b>                  7 Q. But I am just asking whether there is any                  8 record.                  9 <b>A. No, there may be in London. The way we</b>                  10 <b>work in London is that any reporting that I</b>                  11 <b>send in, we had a weekly video conference</b>                  12 <b>and all the issues that had been reported from</b>                  13 <b>Gibraltar to London and indeed our embassy</b>                  14 <b>in Madrid were discussed at length by the</b>                  15 <b>senior people in the team in London, and that</b>                  16 <b>is where I would get my guidance from, and I</b>                  17 <b>think it's important to make a further</b>                  18 <b>comment, if I may, that the way the Foreign</b>                  19 <b>Office works is, policy is not formulated in</b>                  20 <b>Gibraltar, to use Gibraltar as an example. I</b>                  21 <b>would - as Governor or acting Governor -</b>                  22 <b>look at the issues of the day, report them</b>                  23 <b>back to London, make a recommendation;</b>                  24 <b>the recommendation would be put to the</b>                  25 <b>minister by what we call a submission, with</b></p> <p style="text-align: center;">Page 32</p>



<p>1 options as to courses of action. The minister 2 will then decide that course of action. That 3 comes back to us in Gibraltar and we will 4 therefore implement that instruction. 5 (10.35) 6 Q. Why do you mention that in this context? 7 A. It's the context of: most of what I've done, 8 if not everything I've done, has been in 9 agreement with London. So, it's trying to get 10 the point that whilst I didn't write formally, I 11 would use my WhatsApps into a notebook, 12 the notebook would become a written report, 13 the written report would become discussed. 14 That might form the basis of a submission to 15 a minister to seek a course of action that 16 would meet the minister's agreement. 17 Q. Why, in your view, was the GPA's 18 methodology, in its review, seriously flawed? 19 A. Well, not only did they not interview the 20 MOD, but I don't think they interviewed the 21 Governor or myself. In fact, they did not. 22 So, they only interviewed the RGP. 23 Q. Can we go to C316, please? These are 24 the minutes of a meeting on 15 May, a 25 meeting at which you were present, at 9:15</p> <p style="text-align: center;">Page 33</p>	<p>1 had to do was ask the MOD. Just because 2 you don't have jurisdiction and the legal 3 authority to do something, it doesn't mean 4 you can(sic) make an inquiry as to whether 5 that could happen. I am absolutely, 6 unequivocal in my belief that MOD would 7 have said yes and provided full cooperation. 8 Q. Do you recall Mr Nagrani - we heard 9 evidence that Mr Nagrani had advised that it 10 was beyond the GPA's remit to seek evidence 11 from MOD officials. Do you recall him 12 doing so? 13 A. I do, but I can only repeat that that might 14 be the legal case, but it doesn't stop anybody 15 from looking to make an exception. 16 Q. At the time, did you complain to Mr 17 Gonçalves or anyone else, that the 18 methodology was seriously flawed? 19 A. I probably didn't use that at the time. I 20 probably just expressed my view that it 21 wasn't right that only one side were 22 approached about this. 23 Q. Reference is made, as we saw in the 24 minute, to you having reported a 25 conversation with the Governor when the</p> <p style="text-align: center;">Page 35</p>
<p>1 am. It says: "The meeting was called to 2 discuss the CM's verbal request of the 3 chairman on the 9th of May with the GPA 4 enquiry into the airfield incident on the 7th of 5 February 2017. VN..." - which is, I think, a 6 reference to Mr Vikram Nagrani - "... 7 referred to section 13 of the Police Act, 8 section 14 of the Police Act and section 19 of 9 the Police Act. NP..." - which I think is a 10 reference to you - "... reported on a 11 conversation held with HE when the latter 12 envisaged that the GPA recommend that an 13 independent inquiry will be held". Sorry, I 14 think we just need to go down a little bit. 15 "The matter was discussed at length and it 16 was concluded that a formal letter be sent to 17 the CM stating that in the first instance, since 18 the GPA has no jurisdiction to involve the 19 MOD, it proposes to proceed under the 20 provisions of section 19 of the Police Act in 21 order to submit a report to him." You were 22 present at this meeting, as we can see. Did 23 you raise any objections to using the section 24 19 procedure? 25 A. Probably not, but I did say that all they</p> <p style="text-align: center;">Page 34</p>	<p>1 latter envisaged that the GPA should 2 recommend an independent inquiry. Did you 3 share that view? 4 A. Yes, I did. Which goes back to my point 5 that I was there, I believed, to reflect the 6 Governor's feelings on certain matters. 7 Q. Yes. Sorry, just to clarify, when I asked 8 you, "did you share that view", did you 9 support the Governor's view that an inquiry 10 should be held? Did you agree? 11 A. I thought it could be done by a sort of, a 12 review which I said at the beginning, but 13 obviously the Governor's view -- I think that 14 was part of a deal/arrangement with MOD 15 and Tony Radakin, and you may ask me 16 about that later when it was decided not to 17 have an inquiry. Again, I think it is all part 18 of the MOD senior officials having to write 19 letters of apology, but I think certainly - and 20 I think the Governor's evidence does confirm 21 that he was, and still does, I think, wish that 22 there had of been an inquiry rather than a 23 GPA review. 24 Q. Probably a quite esoteric question but 25 what, in your view, is the difference between</p> <p style="text-align: center;">Page 36</p>

<p>1 a review and an inquiry, give that you seem 2 to draw that distinction? 3 <b>A. So again, it may be my Foreign Office 4 training, but there are degrees of how deep 5 you go into something. About how - I mean, 6 a review is a formal review as well. An 7 inquiry lifts it into - as we are seeing with 8 this inquiry - a completely different game. 9 Although, it is not a game of course.</b> 10 THE CHAIRMAN: A different animal. 11 <b>A. Yes.</b> 12 THE CHAIRMAN: Yes. 13 MR SANTOS: Were you present at the GPA 14 meeting when Commissioner of Police 15 Yome, Mr McGrail, Mr Ullger and Mr 16 Tunbridge attended to give evidence to the 17 GPA? 18 <b>A. I don't recall that I was.</b> 19 Q. If we go to B2157, please. This is 20 towards the bottom of the page. It seems as 21 though the letter, the hardcopy letter, has 22 gone missing, but the contents of the 23 hardcopy letter that was sent by the GPA to 24 the Chief Minister are set out in that email, 25 and I do not propose to read the entirety of</p> <p style="text-align: center;">Page 37</p>	<p>1 <b>because I don't remember doesn't mean it 2 didn't happen.</b> 3 Q. Do you remember expressing any 4 concerns about the conclusions that were 5 being drawn? 6 <b>A. I think once I make a point, I very rarely 7 labour it and repetitively go on about it, but I 8 suspect I might have said, again, my 9 frustration that this is a very one sided 10 review, and you know, in respect of the 11 Watterson incident, you know, we need to 12 remember that as a result of RGP actions, Mr 13 Watterson remained on the Rock for 16 14 weeks before he was eventually removed to 15 the UK.</b> 16 Q. If we can now go to your statement at 17 paragraph 21.10, please, A247, you say, 18 "Issues over the forensic capabilities of the 19 RGP also came to light during this incident. 20 The RGP insisted that they conducted the 21 forensic examination of the suspect's laptop 22 and phone etc. I can't recollect the exact 23 timeframe, but remember being told that the 24 RGP investigations should only take a couple 25 of weeks after which the equipment would be</p> <p style="text-align: center;">Page 39</p>
<p>1 that email, but just to go to the second 2 paragraph over the page. We can see that the 3 letter said, "The GPA has come to the firm 4 conclusion that the actions of, and the 5 restraint shown by the relevant RGP officers 6 during the Watterson incident were 7 considered, deliberated, entirely proportional 8 and highly commendable. As such, we do 9 not doubt the effectiveness and probity of the 10 policing demonstrated by the RGP in respect 11 of the Watterson incident. We would take 12 the liberty of adding, though it may not have 13 been our place to do so, that the actions of 14 certain MOD personnel, in respect of the 15 Watterson incident, deserve censure, and that 16 you should consider whether a full inquiry 17 ought to be undertaken by a body 18 independent of the RGP and the MOD, so 19 that lessons may be learned from this 20 incident." Were you part of the deliberations 21 that resulted in this letter being sent? 22 <b>A. I don't believe I was.</b> 23 Q. Would you have seen the draft before it 24 went out? 25 <b>A. That's possible. I don't remember but just</b></p> <p style="text-align: center;">Page 38</p>	<p>1 handed over to MoD. Some two months or so 2 later, with delays resulting from the RGP 3 forensic officer being off work with stress, 4 the RGP pronounced there was no 5 incriminating evidence on the suspect's 6 computer which was then handed over to the 7 MoD. Within two weeks, MoD forensic 8 examination identified the most serious of 9 imagery on the computer, resulting in the 10 accused being found guilty and given a 11 custodial sentence. Over 1000 images were 12 recovered." Do you attribute responsibility 13 for that, the alleged failure in forensic testing 14 of the computer, to Mr McGrail? 15 <b>A. No, and I think I need to - to quite early 16 on in my evidence, separate what I regard as 17 the institution, that is the RGP, and actions of 18 individuals, and at least one of my central 19 points, that the head of an organisation, 20 regardless of why, is ultimately responsible 21 for that work behavior ethics/culture at that 22 organisation.</b> 23 Q. Yes. It is fair to point out, is it not, that 24 he was not the head of the organisation at 25 that point in 2017.</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 <b>A. Correct.</b></p> <p>2 Q. Although it was as far back as 2017,</p> <p>3 would it be fair to say that the airport</p> <p>4 incident coloured your attitude towards Mr</p> <p>5 McGrail for years to come, beyond his</p> <p>6 appointment and right through until May,</p> <p>7 June 2020.</p> <p>8 <b>A. I'd like to think that I am professional</b></p> <p>9 <b>enough to be able to park issues. So,</b></p> <p>10 <b>Between the airfield incident and what I</b></p> <p>11 <b>would call the recovery of the relationship,</b></p> <p>12 <b>which was probably 6 to 12 months later, and</b></p> <p>13 <b>then until the incident at sea, I think my</b></p> <p>14 <b>relations, in my view, of Mr McGrail and the</b></p> <p>15 <b>RGP was generally positive.</b></p> <p>16 Q. Just bear with me one second. (After a</p> <p>17 pause) If we can go to the next paragraph in</p> <p>18 your statement, which you refer to as the</p> <p>19 helicopter pilot incident. You say, " In</p> <p>20 March 2017, during a stop-over in Gibraltar,</p> <p>21 a helicopter pilot and another member of the</p> <p>22 crew were assaulted in a bar in Gibraltar, the</p> <p>23 pilot so severely that his cheek or jawbone</p> <p>24 was fractured which prevented him from</p> <p>25 flying. Despite witnesses and I believe</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. As far as --</p> <p>2 THE CHAIRMAN: He did say that the RGP</p> <p>3 had done no investigation whatsoever into</p> <p>4 the incident, which in fact, turns out to be</p> <p>5 completely wrong.</p> <p>6 <b>A. Yes. I mean, it is on the same level that</b></p> <p>7 <b>Mr McGrail initially said he knew nothing</b></p> <p>8 <b>about the incident, and then later on</b></p> <p>9 <b>remembered that he was asking for reports on</b></p> <p>10 <b>it.</b></p> <p>11 MR SANTOS: If we look at A1388, please?</p> <p>12 Just looking at paragraph 13, this is Mr -</p> <p>13 CBF Walliker's statement, and I just want to</p> <p>14 - given that you have referred to it - I just</p> <p>15 wanted to show you the, I think, what you are</p> <p>16 referring to just for clarity's sake. It is the</p> <p>17 fifth line in that statement towards the end.</p> <p>18 "When I spoke to Supt McGrail about the</p> <p>19 incident, I was told that whilst the RGP was</p> <p>20 investigating the incident, there was evidence</p> <p>21 that the helicopter pilot was drunk and</p> <p>22 abusive and therefore deserved what he got."</p> <p>23 That is the statement that you are referring to.</p> <p>24 Is that right?</p> <p>25 <b>A. Correct.</b></p> <p style="text-align: center;">Page 43</p>
<p>1 CCTV, charges were never pressed. It took</p> <p>2 the RGP several weeks to state that the</p> <p>3 forensic evidence they had collected was not</p> <p>4 conclusive. The widely held belief in MOD</p> <p>5 circles is that the RGP did not investigate the</p> <p>6 crime correctly to protect those involved in</p> <p>7 the attack." Did you take any steps to verify</p> <p>8 whether this widely held belief in MOD</p> <p>9 circles was correct?</p> <p>10 <b>A. No. I didn't. The reason that this</b></p> <p>11 <b>incident sticks in my mind - there is more</b></p> <p>12 <b>than one reason - but the main one is I</b></p> <p>13 <b>remember, which is in his evidence, the CBF</b></p> <p>14 <b>at the time, remarking on the comment that a</b></p> <p>15 <b>discussion he had with Mr McGrail was Mr</b></p> <p>16 <b>McGrail's - I will use the word "alleged"</b></p> <p>17 <b>response, that they were - and I can't</b></p> <p>18 <b>remember it exactly, but it appears in CBF's</b></p> <p>19 <b>statement, they were drunk and abusive and</b></p> <p>20 <b>got what they deserved. I know that Mr</b></p> <p>21 <b>McGrail rejects that and claims he did not</b></p> <p>22 <b>say that, but CBF Walliker did also state that</b></p> <p>23 <b>he reported that comment and - up his chain</b></p> <p>24 <b>of command, so I had no reason to doubt</b></p> <p>25 <b>CBF's version of - over what happened there.</b></p> <p style="text-align: center;">Page 42</p>	<p>1 Q. As you accept, Mr McGrail denies having</p> <p>2 said that.</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Did you raise concerns about this matter</p> <p>5 with the GPA?</p> <p>6 <b>A. I don't believe I did, but I think it might</b></p> <p>7 <b>have been in a newspaper report. So, I</b></p> <p>8 <b>would be surprised if - because what used to</b></p> <p>9 <b>happen at GPA meetings is that if there is an</b></p> <p>10 <b>article in the Panorama we would, more often</b></p> <p>11 <b>not discuss it. Although it wouldn't be again,</b></p> <p>12 <b>a formal agenda item.</b></p> <p>13 Q. Did you raise this issue with Mr McGrail</p> <p>14 during his appointment process to become</p> <p>15 Commissioner of Police?</p> <p>16 <b>A. No, I did not.</b></p> <p>17 Q. Did you raise this issue with the</p> <p>18 Governor?</p> <p>19 <b>A. I would be very surprised if I did not,</b></p> <p>20 <b>although I can't recall that I did.</b></p> <p>21 Q. If we can go to A249 now which is back</p> <p>22 to your statement, paragraph 23. 23.4. This</p> <p>23 is in the section where you are dealing with</p> <p>24 the fractured relationship with the Gibraltar</p> <p>25 Police Federation, but I want to take it now,</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 for reasons which I think will become 2 obvious. You say, " In similar vein, I often 3 heard numerous anecdotal stories of bad 4 practice and behaviours by the RGP that, 5 given the volume of such stories, were hard 6 to 7 ignore, including numerous stories from 8 different sources of the RGP turning a blind 9 eye with crimes committed by people they 10 know. These were rumours and anecdotal, 11 and therefore, despite some of the sources 12 being credible, were not things on which I 13 felt it was possible to act. They nevertheless 14 contributed to my growing sense of unease." 15 You have already alluded to it, but where did 16 you hear these rumors of bad practice? 17 <b>A. I think there were numerous reports on 18 social media; there were numerous media 19 reports; it would be talked about on the golf 20 course, in the bars and in the restaurants with 21 people I was engaging with.</b> 22 Q. Did you ever raise those rumors with the 23 GPA? 24 <b>A. I did, I believe. I have to now accept, not 25 formally, and on that point give the volume</b></p> <p style="text-align: center;">Page 45</p>	<p>1 vacancy of Commissioner of Police should 2 not be limited to officers from the RGP but 3 should be opened to police officers in the 4 UK. That view received no support from any 5 of the other members of the GPA. The 6 Deputy Governor further told me that he 7 would not support McGrail's application, to 8 which I replied that it was unfair to prejudge 9 any applicant before the selection process 10 had [been] commenced." Do you accept that 11 you said that applications should be open to 12 officers in the UK? 13 <b>A. Yes, I did, but not to officers in the UK. I 14 was very careful about this. That when I was 15 made aware that there were only two 16 candidates, my comment was, I was 17 surprised that the advert was not broadcast or 18 that the position wasn't advertised, in for 19 example, certain police organisations - and I 20 referenced the commonwealth and the 21 overseas territory, and I remember stating 22 very clearly that this is not about the UK, 23 because I was aware of previous issues with 24 recruitment from the UK, and how Gibraltar 25 in general thought about the issue of people</b></p> <p style="text-align: center;">Page 47</p>
<p>1 <b>of regularity of such rumours and anecdotal 2 reports and media, and social media reporting 3 of it, if the GPA did not discuss it, then we 4 were simply not doing our job.</b> 5 Q. Is it fair to categorise the helicopter pilot 6 assault incident and these anecdotal stories, 7 in the category of things that you had heard 8 but you had not taken steps to verify, 9 effectively. 10 <b>A. Yes, but a lot of - on numerous occasions 11 the people telling me, as I said here, sources 12 being credible.</b> 13 Q. Can we now move on to the appointment 14 process. I just want to show you Mr 15 Gonçalves' statement. A341, paragraph 25. 16 There he says, "Before proceeding to explain 17 the process which led to the appointment of 18 McGrail as Commissioner of Police I wish to 19 state that I did not, at any time, receive any 20 objection to the said appointment from either 21 the Governor ... or the Chief Minister. 22 However, the Deputy Governor, Mr Nick 23 Pyle, who was a member of the GPA at the 24 time, commented at a meeting of the GPA 25 that he felt that applications to fill the</p> <p style="text-align: center;">Page 46</p>	<p>1 <b>from the UK coming onto the Rock. So, my 2 line was, this may attract candidates - and I 3 remember saying this clearly - from 4 Australia, to Singapore, to South Africa, to 5 Canada, or the Caribbean, and the idea was 6 to have a broad field. I remember the chair 7 of the GPA saying that they wanted a 8 Gibraltarian for the role. I remember 9 challenging that carefully by suggesting what 10 they needed was the best person for the role, 11 and whilst that might be a Gibraltarian, not to 12 have a wider field may not be in Gibraltar's 13 interests. I did also add that I would not be 14 adverse, and I have done a lot of recruitment 15 from senior level ambassadors to PA's, where 16 it is not uncommon to put a weighting on any 17 individual candidate, and I remember saying 18 a weighting on candidates from Gibraltar 19 would be quite appropriate.</b> 20 Q. Mr Gonçalves told the inquiry in his 21 evidence that during the initial GPA meeting 22 where the application procedure was agreed, 23 you said in an aside to him that you would 24 not support Mr McGrail's application. Did 25 you say that?</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 <b>A. No, I did not.</b></p> <p>2 Q. Did you say something to that effect, at</p> <p>3 any stage during the process?</p> <p>4 <b>A. No, I did not.</b></p> <p>5 Q. Mr Gonçalves told the inquiry that it was</p> <p>6 evident to him that you clearly did not like</p> <p>7 Mr McGrail. Is that a fair characterisation of</p> <p>8 your feeling towards Mr McGrail at that</p> <p>9 point?</p> <p>10 <b>A. Not at all. With respect, I don't know Mr</b></p> <p>11 <b>McGrail whether to like him or not. What</b></p> <p>12 <b>I've always looked for in leadership is</b></p> <p>13 <b>respect, admire and like. So, you respect a</b></p> <p>14 <b>position, you admire the person for the job</b></p> <p>15 <b>that they do, and you like them for the</b></p> <p>16 <b>individual they are. I didn't know Mr</b></p> <p>17 <b>McGrail in order to have any judgement on</b></p> <p>18 <b>whether I liked him or not. I do have one</b></p> <p>19 <b>comment I'd like to make on that in terms of,</b></p> <p>20 <b>I am quite surprised that the Chairman</b></p> <p>21 <b>thinking that I added - I had a sort of</b></p> <p>22 <b>pre disposition not to support Mr McGrail, if I</b></p> <p>23 <b>was chair and I picked up that one of my</b></p> <p>24 <b>panel members held that view, I would</b></p> <p>25 <b>remove them from the panel, quite simply.</b></p> <p style="text-align: center;">Page 49</p>	<p>1 this is not correct is demonstrated by the</p> <p>2 facts that (i) JG does not himself say that I</p> <p>3 said this of both candidates and (ii) that I</p> <p>4 actually voted for Mr Ullger." Mr Lavarello</p> <p>5 says that notwithstanding your vote for Mr</p> <p>6 Ullger, you had previously said to him, but</p> <p>7 perhaps only him personally, that you would</p> <p>8 not support either candidate. Do you agree</p> <p>9 with that?</p> <p>10 <b>A. No, I don't, and if I had have said that as</b></p> <p>11 <b>bluntly as that, I would not support either</b></p> <p>12 <b>candidate, I would not have supported either</b></p> <p>13 <b>candidate. I would have recused myself from</b></p> <p>14 <b>the process. I can hardly say something to</b></p> <p>15 <b>the chair of the GPA and one of its members,</b></p> <p>16 <b>and then do the opposite.</b></p> <p>17 Q. Can we go to A199 now, please? This is</p> <p>18 the Chief Minister's first affidavit to the</p> <p>19 inquiry, and I just want to focus on the</p> <p>20 message timed at 9:58 which is in the lightest</p> <p>21 blue, and we can see on the screen, it is a</p> <p>22 message of 14 May 2020 in response to a</p> <p>23 message from him to you, listing a number of</p> <p>24 issues which are causing him to start to lose</p> <p>25 confidence in the senior management of the</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. You had that - had obviously had that</p> <p>2 experience with him and the senior</p> <p>3 management of the RGP during the airport</p> <p>4 incident. Are you saying that, that did not</p> <p>5 influence your participation in the process at</p> <p>6 all?</p> <p>7 <b>A. I think what I'm saying is that I would</b></p> <p>8 <b>like to consider myself professional enough</b></p> <p>9 <b>that I could park issues that were a year or so</b></p> <p>10 <b>old and be objective. So, again, if I had said,</b></p> <p>11 <b>either to the chair or Mr Lavarello, that I</b></p> <p>12 <b>would not support Mr McGrail, or to Mr</b></p> <p>13 <b>Lavarello, Mr McGrail or Mr Ullger, such</b></p> <p>14 <b>are my principles that I would have recused</b></p> <p>15 <b>myself from the interview panel. I would</b></p> <p>16 <b>have asked or suggested that somebody else</b></p> <p>17 <b>take my position on the panel and I would sit</b></p> <p>18 <b>in the back seats.</b></p> <p>19 Q. Can we look at your second affidavit, at</p> <p>20 paragraph 27 where you deal with Mr</p> <p>21 Lavarello's evidence? You say, "Insofar as</p> <p>22 concerns Mr Lavarello's assertion at para 34</p> <p>23 of his statement dated 20 October 2022 that I</p> <p>24 'would not support either candidate', I can</p> <p>25 only say that Mr Lavarello is mistaken. That</p> <p style="text-align: center;">Page 50</p>	<p>1 RGP, he says, and you say, "Agree. As we</p> <p>2 thought at the time, wrong appointment.</p> <p>3 Remind me to tell you about the recruitment</p> <p>4 process which was abject." Why did you say</p> <p>5 that the process was abject?</p> <p>6 <b>A. I'd first of all just like to apologise of that</b></p> <p>7 <b>word "abject". Had I thought that my</b></p> <p>8 <b>WhatsApps and my communications would</b></p> <p>9 <b>be so forensically examined some years later,</b></p> <p>10 <b>as with lots of the work I do, some of my</b></p> <p>11 <b>language would have been softer, some of</b></p> <p>12 <b>my language would have been harder.</b></p> <p>13 <b>"Abject" is too strong a word, and I apologise</b></p> <p>14 <b>to the Chairman and the members of the</b></p> <p>15 <b>GPA unreservedly for that. I would probably</b></p> <p>16 <b>say, "which had flaws", or was suboptimal.</b></p> <p>17 Q. Did you raise any concerns about the</p> <p>18 recruitment process with the GPA at the</p> <p>19 time?</p> <p>20 <b>A. No, because it was a very fluid and live</b></p> <p>21 <b>process. So, perhaps I should have done</b></p> <p>22 <b>more research and verified. I mean, as an</b></p> <p>23 <b>example, on the day of the interviews, I</b></p> <p>24 <b>would expect a folder with a sort of an</b></p> <p>25 <b>agreed, consolidated scoring sheet with</b></p> <p style="text-align: center;">Page 52</p>

<p>1 <b>methodology of marking with tight questions</b>  2 <b>rather than loose competencies that were</b>  3 <b>going to be explored.</b>  4 Q. But you did not make any suggestions at  5 the time for improving the process?  6 <b>A. No, because, as I said, I assumed that's</b>  7 <b>what I would be presented with in - when it</b>  8 <b>was, I am using my own notebook and my</b>  9 <b>own scoring system. I was a bit surprised by</b>  10 <b>that. So, again, I think Mr Lavarello refers to</b>  11 <b>this, that the same as my suggestion that the</b>  12 <b>recruitment be opened, I wasn't of course</b>  13 <b>meaning for this recruitment which was a</b>  14 <b>matter of days away; this was more</b>  15 <b>meaning of it as sort of, as people know me</b>  16 <b>well, I have a view on most things and I don't</b>  17 <b>duck the difficult, and I will give my view</b>  18 <b>hopefully, carefully and considered, so I</b>  19 <b>think I was more making a statement for</b>  20 <b>future recruitment processes.</b>  21 Q. We know that you preferred Mr Ullger  22 after hearing the applications, but had the  23 Chief Minister also expressed a preference  24 for Mr Ullger, as your text states?  25 <b>A. Yes. I was told that by the Governor.</b></p> <p style="text-align: center;">Page 53</p>	<p>1 <b>think the - you know, people had moved -</b>  2 <b>were moving on from the airfield incident</b>  3 <b>and I was focusing on the application and the</b>  4 <b>recruitment process for a Commissioner of</b>  5 <b>Police.</b>  6 THE CHAIRMAN: On reflection, do you  7 think it is fair to harp back to the airport  8 incident and the helicopter pilot assault after  9 you had not referred to them during the  10 appointment process?  11 <b>A. As I think I have said previously, the -</b>  12 <b>my loss of confidence was really only around</b>  13 <b>the incident at sea, and what I was trying to</b>  14 <b>do was give background to, sort of, concerns</b>  15 <b>I had over certain aspects of Mr McGrail's</b>  16 <b>behaviour, leadership and the way that the</b>  17 <b>RGP operated. As I said, it's - there's also a</b>  18 <b>sort of an institutionalist issue here, rather</b>  19 <b>than focus on just one person. The incident</b>  20 <b>at sea is a massively separate incident and a</b>  21 <b>self-standing one in my opinion.</b>  22 THE CHAIRMAN: Well then, let me  23 rephrase the question. Did you think it was  24 fair to draw on what you call your  25 background of concerns, in relation to the</p> <p style="text-align: center;">Page 55</p>
<p>1 Q. By the Governor. Did the Governor  2 explain to you why the Chief Minister  3 preferred Mr Ullger?  4 <b>A. No.</b>  5 Q. You were a member of the panel, as you  6 say, that interviewed Mr McGrail. Did you  7 use your opportunity as a panel member to  8 raise any concerns with Mr McGrail about,  9 for example, the airport incident, or the  10 helicopter pilot assault incident or anything  11 of the concerns that you have mentioned in  12 your witness statement?  13 <b>A. No. As I said, I think I have separated</b>  14 <b>that, and we had moved forward, and the</b>  15 <b>application was a self-standing issue. This</b>  16 <b>was about the future of the RGP, not things</b>  17 <b>that had happened before. Mr McGrail and</b>  18 <b>Mr Ullger were both credible candidates in</b>  19 <b>the sift I did, my own sift. So, I was, you</b>  20 <b>know --</b>  21 THE CHAIRMAN: If you had concerns  22 about those incidents, the airport incident and  23 the helicopter pilot assault, why did you not  24 raise them in the appointment process?  25 <b>A. As I have just explained, Mr Chairman, I</b></p> <p style="text-align: center;">Page 54</p>	<p>1 airport incident and the helicopter pilot  2 assault, when you did not refer to them  3 during the recruitment process?  4 <b>A. I think if I'd have referred, in my</b>  5 <b>evidence, to previous incidents without</b>  6 <b>explaining what they were, I may have been</b>  7 <b>asked to go into the detail of what those</b>  8 <b>incidents were, but I do take the point. I'm</b>  9 <b>not ducking that issue.</b>  10 THE CHAIRMAN: Okay.  11 MR SANTOS: Can we now move on to the  12 Police Federation points that you make in  13 your evidence. It is a 23.1 and 23.2 of your  14 evidence at A248. It is headed, "Fractured  15 relationship with the Gibraltar Police  16 Federation". You say, "Mr McGrail's  17 management style resulted in a fractured,  18 almost hostile relationship between him and  19 the Gibraltar Police Federation, the  20 representative body of rank and file and more  21 junior officers in the RGP and in poor morale  22 within the RGP ... The resulting tensions  23 between the RGP leadership and the Police  24 Federation culminated in formal complaints  25 from the Federation to the GPA about Mr</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 McGrail. The GPA regularly spoke at its 2 meetings about the allegations of bullying 3 and intimidation by Mr McGrail. As 4 evidence of this, an email from the 5 Federation Chairman to the GPA dated 22 6 June 2020 states: 'It is no secret we have had 7 numerous issues with Mr McGrail due his 8 management style and lack of respect ...' 9 While this issue was a concern of a lesser 10 order of gravity, it nevertheless fitted into the 11 pattern of behaviours by Mr McGrail which 12 was already causing me 13 concern and causing me to begin to lose 14 confidence in him." I do not think there is 15 any dispute between any of the parties 16 involved that there was a fractured 17 relationship between Mr McGrail and the 18 Gibraltar Police Federation, but we want to 19 focus on the complaints that you refer to. 20 You have already mentioned the word 21 "formal". Do you maintain that formal 22 complaints were made to the GPA about 23 this? 24 <b>A. By myself or by others?</b> 25 Q. Well, in 23.2, you say, " The resulting</p> <p style="text-align: center;">Page 57</p>	<p>1 <b>A. I think - well it is - I think this has come 2 up in evidence from Mr Morello.</b> 3 Q. I will take you to Mr Morello's evidence, 4 but just first of all, can I take you to A329. 5 Sorry to cut you across, but I will come back 6 to that. If we go, first of all, to A329. The 7 bottom of that page, this is Dr Britto's second 8 witness statement, and he says, "The issues 9 and disputes between Mr McGrail / 10 Command on the one hand and Mr Morello / 11 GPF on the other were occasionally raised 12 with me by both sides. However, no formal 13 complaint, oral or written, was ever made. I 14 regarded things said to me as matters in 15 dispute rather than complaints. Indeed, it 16 seems to be acknowledged by Mr Morello at 17 paragraph 147 of his witness statement that 18 no formal complaint was made, as there was 19 no procedure in place which enabled a 20 complaint against the Commissioner to be 21 made. Mr Morello states at paragraph 148 of 22 his witness statement that if such procedure 23 had been in place, he would have filed a 24 complaint of bullying against Mr McGrail. 25 He said this in the context of Written</p> <p style="text-align: center;">Page 59</p>
<p>1 tensions between the RGP leadership and the 2 Police Federation culminated in formal 3 complaints -- 4 <b>A. From the Federation.</b> 5 Q. -- from the Federation to the GPA about 6 Mr McGrail." So, I suppose that would 7 encompass either/or. 8 <b>A. Yes. So, I was under the impression that 9 the Federation were, or had complained or 10 were looking to complain formally about Mr 11 McGrail to the GPA. From my own point of 12 view, I can just again refer back to something 13 I've said, which I can go over again if you 14 wish, but about the reports and the stories 15 and the media reporting. I can't unread what 16 I read at the time. I can't unhear what I heard 17 at the time and they tend to, when issues 18 come together, like this, they tend to sort of 19 maybe rise up a little bit more than they 20 should do.</b> 21 Q. Do you have any recollection of 22 complaints being med by the police 23 federation at GPA meetings? 24 <b>A. Not one that I was at.</b> 25 Q. One that you were not at?</p> <p style="text-align: center;">Page 58</p>	<p>1 Warning and Regulation 9 notices issues by 2 Command, which flowed from the ongoing 3 dispute as to superintendence and guidance." 4 Do you accept Dr Britto's evidence that the 5 issues and disputes between them were 6 occasionally raised with him on both sides, 7 but no formal complaint was ever made. 8 <b>A. I have the utmost respect for Dr Britto, so 9 I don't have any issue with that. I think it 10 does point to an issue quite similar with the 11 airfield incident, where a gap in legislation 12 allowed an incident to develop, or a 13 misunderstanding that the armed forced had 14 not been extended to Gibraltar and I do 15 remember, again, having explained that I 16 give my view at numerous GPA meetings, I 17 would often suggest that the Police Act 18 needed revising in order to allow the GPA to 19 have a bit more management 20 control/leadership, over issues of the RGP, 21 and of course, this would have formed part of 22 that because of course there has to be a 23 formal mechanism for the federation to 24 complain against anybody in the RGP.</b> 25 Q. I will now take you to Mr Morello's</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 evidence. It is at A1225. He says, "At some 2 point after being served with the Written 3 Warning and Regulation 9 notices, I spoke to 4 Dr Joey Britto on the phone, and asked if I 5 could address the GPA Board, not only in 6 relation to the ongoing internal investigation 7 but the general relationship with the GPF/ 8 Command and the authoritarian style of 9 leadership ... This meeting was held at the 10 GPA offices at Casemates Square [sometime 11 in February 2020] where I can recall that 12 most of the GPA Board were in attendance. 13 The meeting commenced and the first thing I 14 said was 'how do I file a complaint of 15 bullying against the Commissioner of 16 Police?' ... The room was silent and I can 17 recall Mr Britto saying words to the effect 'no 18 please, no, that's all we need now'. Again, I 19 repeated the same 'how do I file a complaint 20 of bullying against the Commissioner of 21 Police?'. I paused for a few seconds and said, 22 'you can't, there is no recourse'. I informed 23 persons present that the point I was trying to 24 make was that there were no processes to 25 make complaints against the Commissioner</p> <p style="text-align: center;">Page 61</p>	<p>1 recollection of that? 2 <b>A. So, as I say, just because I don't 3 remember doesn't mean it didn't happen. I 4 do have in my mind Dr Britto's quote, but 5 that -- I used to meet Dr Britto separately, 6 we'd have coffee occasionally with the Chief 7 Secretary to work things out, so whether that 8 came from Dr Britto or whether it's (I don't 9 know whether the expression is correct) an 10 implanted memory from reading witness 11 statements. But I have no reason to doubt Mr 12 Morello, it is just that I simply don't recall 13 being at that meeting. I do recall, you know, 14 a meeting almost in passing in the Governor's 15 office with Mr Morello, which I think 16 precluded this meeting with the GPA, so I 17 may be conflating meetings.</b> 18 Q. When you in your witness statement refer 19 to "formal complaints" being made to the 20 GPA then, you are not referring to this 21 meeting from your own recollection but 22 rather the way that Dr Britto describes it, as 23 these matters finding their way to the GPA on 24 a number of occasions. 25 <b>A. No, I think I was referring to this</b></p> <p style="text-align: center;">Page 63</p>
<p>1 or Assistant Commissioner such as were in 2 place in the UK. Both these individuals 3 expressly fall outside the remit of the Police 4 (Discipline) Regulations 1991. Consequently, 5 conduct which falls short of criminal 6 offences but which would constitute 7 disciplinary offences for any other member 8 of the force would not be so for the 9 Commissioner and Assistant Commissioner 10 ... 11 "I followed this up by saying that if there had 12 been a process for doing so, this would have 13 already been done. I gave the Board a 14 summary of events that had transpired since 15 being elected as Convenor and the issues 16 raised in our Staff surveys, at which point a 17 Board member stated 'that is clearly bullying, 18 and the problem clearly here is Mr McGrail.' 19 Do you recall being at a meeting where that 20 exchange occurred? 21 (11.11) 22 <b>A. I don't. I don't recall being there.</b> 23 Q. Mr Morello states that you were sitting 24 across from him when he made this 25 complaint. Do you really (?) have no</p> <p style="text-align: center;">Page 62</p>	<p>1 <b>meeting, which I knew about. My statement 2 is: I can't recall whether I was there.</b> 3 Q. Dr Britto has given evidence that you 4 often raised with him that you believed that 5 the RGP needed to modernise. Was that a 6 view you held about the RGP generally, or 7 about Mr McGrail in particular? 8 <b>A. No, it was a general view, and I do want 9 to be clear on that. I felt there was an 10 institutional issue, which I think was borne 11 out by the newest HMIC reports, which I'm 12 sure we'll come to. But the, you know, some 13 of the issues that I had had been raised by 14 reports, in my opinion hadn't really been 15 addressed. And indeed, some of the -- I use 16 the word "behaviours" carefully, I think were 17 just being repeated.</b> 18 Q. Moving on now to the incident at sea on 19 8 March 2020. Can we go to B85, please. 20 This is a WhatsApp exchange on the morning 21 of 8 March Between Mr McGrail and you. It 22 starts at five past six in the morning. Mr 23 McGrail says, "Nick, we're dealing with a 24 critical incident. One of our boats has been 25 involved in a collision with a smuggling RIB</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)



<p>1 with four on board. Two on the smuggling 2 RIB are fatalities, our crew are uninjured but 3 clearly shaken and shocked. I'm invoking 4 post-incident procedures and planning for 5 consequence management. One I have 6 further updates I will let you know. Regards, 7 Ian". You respond, "Ian, thanks for letting 8 me know, sorry to hear this. And of course, 9 if TY need anything from us HMG just ask. 10 Hope your guys are ok." And he says, 11 "Thanks Nick". You thanked him for letting 12 you know, you did not ask any further 13 queries at that stage though. Is there any 14 reason why you did not ask any further 15 questions? 16 <b>A. Probably because I'd only just seen the 17 WhatsApp, wanted to immediately respond 18 given that Mr McGrail had sent it at 06.05, 19 and probably in the expectation that over the 20 next few hours I would be briefed, called or 21 emailed, and updated on events.</b> 22 Q. Presumably it is standard practice for the 23 Governor to be updated by the RGP when 24 there are major incidents which fall within 25 the Governor's responsibilities under section</p> <p style="text-align: center;">Page 65</p>	<p>1 <b>Attorney General walking out of the room 2 with his moped helmet in his hand. I think 3 Inspector Field was there, and Chipolina. I 4 have to say that I engineered the walk past -- 5 our dog, who's called Cabo (?) with my wife, 6 in order to pop in to have -- because I was 7 conscious that, you know, close to six hours 8 after my first contact with Mr McGrail I had 9 no further contact with him.</b> 10 Q. I had to use every ounce of my restraint 11 not to ask you the name of the dog, which 12 has come up several times. But can we go to 13 B5735, please. This is Superintendent 14 Richardson's very brief note on that meeting, 15 the entry at 12.15. And he says, "HE act (?) 16 arrives." I think that is a reference to you. 17 And he also has the name "Michael Llamas", 18 and a mobile number there. Given that there 19 is a reference to the Attorney General, is your 20 evidence that you recall him walking out as 21 you walked in? Is that what you said? 22 <b>A. Quite close to that. Maybe he was there 23 for a fleeting moment.</b> 24 Q. So, you say that you went past. Just to 25 clarify, you explained that you were walking</p> <p style="text-align: center;">Page 67</p>
<p>1 47 of the Constitution? 2 <b>A. Absolutely.</b> 3 Q. If we can go to your statement now at 4 paragraph 25.3, which is at A251. Or, first of 5 all, 25.1. "Without doubt, the most serious 6 incident that was the tipping point from my 7 'growing concerns' changing to recognising 8 that things could not go on as they were and 9 that change was needed, arose in relation to 10 this incident, which set in motion a chain of 11 events that led me to lose confidence in the 12 abilities of the Commissioner to effectively 13 lead his police force, and indeed caused me 14 to lose confidence in his probity." You then 15 refer to the exchange that we have just been 16 looking at. And then, 25.3, you say, "Whilst 17 walking my dog past New Mole House 18 (NMH) at around midday on the 8th March I 19 decided to call in and asked to see Mr 20 McGrail. He was there and agreed to see 21 me." Who was present at the meeting that 22 you refer to there with Mr McGrail, from 23 your recollection? 24 <b>A. My impression was that the meeting was 25 concluding, and I have a vague picture of the</b></p> <p style="text-align: center;">Page 66</p>	<p>1 past. Were you effectively deliberately 2 walking past there to see whether you could 3 pick up more information? 4 <b>A. Yes.</b> 5 Q. You refer to Inspector Chipolina being 6 there, do you have a clear recollection of him 7 being there? 8 <b>A. It's an impression rather than a certainty.</b> 9 Q. Going back to your evidence, A251. You 10 say, "Given the possibility of a diplomatic 11 and political situation with Spain about this 12 incident, which (being external affairs) would 13 be the responsibility of the Governor and 14 HMGOG, my primary concern was to 15 establish the location of the incident, and 16 whether it had occurred in Spanish territorial 17 waters. I therefore asked Mr McGrail about 18 the location and whether it was inside or 19 outside BGTW. He replied with a slightly 20 flippant waving of his hands, 'could be in, 21 and could be out, it's difficult to tell at 22 night'." Mr McGrail's evidence is that you 23 did not raise any particular query as to the 24 location of the incident. Is it your evidence 25 that your expressly asked him about the</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 location?</p> <p>2 <b>A. Absolutely.</b></p> <p>3 Q. How long did this meeting last, from your</p> <p>4 recollection?</p> <p>5 <b>A. I think it was possibly ten, fifteen</b></p> <p>6 <b>minutes. I hate to say this, because my wife</b></p> <p>7 <b>and dog were waiting outside in part, but I</b></p> <p>8 <b>just wanted to make the point. The issue for</b></p> <p>9 <b>me with exactly what I said there, and with</b></p> <p>10 <b>negotiations with Spain starting. The only</b></p> <p>11 <b>thing at the time, outside of concern for the</b></p> <p>12 <b>welfare of those involved in the incident, was</b></p> <p>13 <b>where it happened. I didn't really need to</b></p> <p>14 <b>know anything else at that moment.</b></p> <p>15 Q. Did you explain to Mr McGrail why the</p> <p>16 location of collision was an important factor</p> <p>17 for you?</p> <p>18 <b>A. I would be surprised if I didn't, to set the</b></p> <p>19 <b>context.</b></p> <p>20 Q. But you do not have a recollection of it?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Apart from 'could be in, and could be</p> <p>23 out', did Mr McGrail give you any indication</p> <p>24 of the location of the collision.</p> <p>25 <b>A. Absolutely not. I mean, I think I focused</b></p> <p style="text-align: center;">Page 69</p>	<p>1 have reported them to the FCDO?</p> <p>2 <b>A. Absolutely. And to Madrid, and to -- yes,</b></p> <p>3 <b>that would have been a message that would</b></p> <p>4 <b>have gone up to -- and I -- without doubt to</b></p> <p>5 <b>ministerial level.</b></p> <p>6 Q. Was there a distinction being made in</p> <p>7 communications between on the one hand the</p> <p>8 location of the collision, and on the other the</p> <p>9 location of the chase?</p> <p>10 <b>A. That wasn't mentioned on the Sunday, but</b></p> <p>11 <b>it did come up in the meeting on the Monday,</b></p> <p>12 <b>where I'm --</b></p> <p>13 Q. We will come to Monday. But, not on the</p> <p>14 Sunday?</p> <p>15 <b>A. It was not -- it was not mentioned on the</b></p> <p>16 <b>Sunday.</b></p> <p>17 Q. Are you aware of any motivation Mr</p> <p>18 McGrail might have had for not giving you</p> <p>19 the best information available to him?</p> <p>20 <b>A. No, and to be fair to Mr McGrail it's a</b></p> <p>21 <b>question I've asked myself numerous times. I</b></p> <p>22 <b>can only think, initially it was an oversight.</b></p> <p>23 Q. Can we now go to B1436, please.</p> <p>24 <b>A. Sorry?</b></p> <p>25 Q. 1346, apologies. 1346. Just looking at</p> <p style="text-align: center;">Page 71</p>
<p>1 <b>on, and knowing, you know, the waters quite</b></p> <p>2 <b>well, 'could be in', 'could be out', for me was</b></p> <p>3 <b>uncertain to within a couple of hundred yards</b></p> <p>4 <b>or so, or three hundred yards maybe. So I</b></p> <p>5 <b>took Mr McGrail's words as they were, and I</b></p> <p>6 <b>thought: well, they obviously need to find out</b></p> <p>7 <b>whether they are in or out.</b></p> <p>8 Q. We have seen from the records that at that</p> <p>9 moment provisional coordinates were</p> <p>10 available to the RGP, albeit not confirmed</p> <p>11 coordinates. From your perspective, would</p> <p>12 you have considered it helpful to have been</p> <p>13 told of those?</p> <p>14 <b>A. Absolutely. Because without doubt, in</b></p> <p>15 <b>my mind it would have firmly told me,</b></p> <p>16 <b>unequivocally, that the incident, the accident,</b></p> <p>17 <b>the death at sea was firmly inside Spanish</b></p> <p>18 <b>waters.</b></p> <p>19 Q. Even if they were yet to be confirmed?</p> <p>20 <b>A. Yes. I mean, for me I think, as I said, it's,</b></p> <p>21 <b>you know, once I was made aware of how far</b></p> <p>22 <b>in. It doesn't matter whether they're two</b></p> <p>23 <b>miles in, or five miles in, or one mile in.</b></p> <p>24 Q. If you had been told the provisional</p> <p>25 coordinates, do you consider that you would</p> <p style="text-align: center;">Page 70</p>	<p>1 the first four messages there on 8 March,</p> <p>2 starting from the top. At 13.33 hours you</p> <p>3 send a message to the Commissioner of</p> <p>4 Police saying, "Thanks for the briefing, I'll</p> <p>5 do a quick note for London for when it hits</p> <p>6 the press. Line will be investigation ongoing.</p> <p>7 Spanish nationals from Ceuta, did you say</p> <p>8 one person was Portuguese? Not sure in</p> <p>9 whose waters incident took place. RGP</p> <p>10 seeking assistance from UK police</p> <p>11 authorities, no assistance needed from FCO</p> <p>12 at this stage." And he replies, "Yes, all</p> <p>13 correct. Indeed one was Portuguese. Trying</p> <p>14 to clarify exact position of the collision."</p> <p>15 And you say, "ok, thanks". Knowing what</p> <p>16 you do now, do you consider that the</p> <p>17 information in that message exchange as to</p> <p>18 the collision was correct?</p> <p>19 <b>A. No, it's not correct: without doubt in my</b></p> <p>20 <b>mind, Mr McGrail knew in whose waters the</b></p> <p>21 <b>incident took place.</b></p> <p>22 Q. There is another reference in this</p> <p>23 exchange to the "exact position of the</p> <p>24 collision", "Trying to clarify exact position of</p> <p>25 the collision." Had Mr McGrail shared with</p> <p style="text-align: center;">Page 72</p>

<p>1 you a rough idea of the location of the 2 collision. 3 <b>A. No, I was still under the "could be in", 4 "could be out" assumption.</b> 5 Q. If we can go to B1746 now, please. This 6 is your report to the FCO at 2.09, which is a 7 short while after that message exchange. 8 And you say, "I've just met with the 9 Commissioner of Police, who kindly gave me 10 a briefing on the incident. The facts have yet 11 to be determined and the investigation is 12 ongoing, but initial headlines are as follows: 13 the incident happened at 0400 hours, though 14 it is not yet known whether it took place in 15 BGTW waters or just outside." Does that 16 reflect the best information that you had 17 obtained from Mr McGrail in the briefing? 18 <b>A. Yes, it does.</b> 19 MR SANTOS: We are about to move on to 9 20 March, but I note the time and I wonder 21 whether perhaps now is an appropriate 22 moment for a mid-morning break, sir. 23 THE CHAIRMAN: Short break. It is really 24 for the benefit of the transcriber. 25 NICHOLAS PYLE: Absolutely.</p> <p style="text-align: center;">Page 73</p>	<p>1 place and being asked if the chase had been 2 plotted/ recorded as the coordinates were 3 well out of BGTW, I was unable to answer 4 this." He gave evidence that he took copies 5 of this printed-out map to the room with him. 6 If we go now to B2789, please. This is the 7 printout that Superintendent Field says he 8 took with him at 11.05, and his evidence was 9 that he believed that he had left that map with 10 him in the Commissioner's office. At least 11 one copy, perhaps several copies. Do you 12 have any recollection of being shown or 13 seeing this map in the room when you 14 arrived? 15 <b>A. I can categorically state that that map was 16 not shown to me.</b> 17 Q. Moving on to 9 March, if we can -- 18 THE CHAIRMAN: Because if it had been, 19 (a) you would remember it, and you would 20 probably have taken a copy, and you would 21 have realised how very important it was. 22 <b>A. Absolutely correct, sir.</b> 23 Q. If we can go to B85. I just want to look 24 at the message at 10.15 on the morning of the 25 9th, which is about halfway down the page.</p> <p style="text-align: center;">Page 75</p>
<p>1 THE CHAIRMAN: Okay. 2 NICHOLAS PYLE: Absolutely. 3 THE CHAIRMAN: Thank you. 4 MR SANTOS: Thank you. 5 (11.25) 6 (Adjourned for a short time) 7 (11.39) 8 Q. Can I ask that A801 be shown on screen, 9 please. This is the first witness statement of 10 Superintendent John Field, where he deals 11 with 8 March. And he says at paragraph 37, 12 towards the bottom of that page. 36, first of 13 all, "At 09.40hrs, I received a report from 14 Insp Paul Chipolina who had obtained the co- 15 ordinates through his contacts in the Spanish 16 Guardia Civil. These were 36'09 N 5'12 W, 17 approximately 6.54 miles east of Playa Santa 18 Barbara." Then he says, "I then had the co- 19 ordinates plotted on a map and subsequently 20 made my way to the COP suite." "At 1 21 1.05hrs, I briefed COP, Detective 22 Superintendent Paul Richardson and The 23 Attorney General, Mr Llamas who was also 24 there, concerning the suspected exact co- 25 ordinates. I remember a discussion taking</p> <p style="text-align: center;">Page 74</p>	<p>1 This is a message from you to Mr McGrail. 2 "Morning. I was with the AG last night, and 3 we wondered whether it would be worth 4 having an update at some stage later this 5 morning. We're keen to reach out to Spain, 6 given talks this week in London. Please 7 protect". You allude to this meeting in your 8 evidence, if we go to A252, paragraph 25.5. 9 You say, "On the evening of 8th March, the 10 Attorney General and I agreed that we 11 needed to see Mr McGrail the next day to get 12 details and clarity over the incident, not least 13 given the Gibraltar EU Exit negotiations with 14 Spain which were then ongoing, and which 15 were scheduled to continue that week. I said I 16 would set a meeting up and did so." Given 17 that the incident at sea was the major news of 18 the day, I presume you discussed it over 19 supper? 20 <b>A. It's inconceivable that we did not. We 21 absolutely would have discussed it.</b> 22 Q. If we can go to B1345, and towards the 23 bottom of the page at 11.40 we can see a 24 message from the Attorney General to the 25 Commissioner of Police. This is a message</p> <p style="text-align: center;">Page 76</p>

<p>1 that the Attorney General in fact had intended 2 to send to the Chief Minister, but which it 3 appears was never actually sent. But I just 4 want to focus on what is said within it. 5 "Been in New Mole for the last hour or so. 6 Cooperation RGP/Spanish LEAs very good. 7 New RGP Press Release today will say good 8 cooperation with ES, drug related activity, 2 9 deaths are Spanish nationals of North African 10 descent. Investigation continues. PR will 11 not say where incident occurred but it is 12 virtually certain it was outside BGTW 13 eastern side opposite runway." So that is at 14 11.40 on 8 March, the Attorney General's 15 apparent knowledge of the location of the 16 incident. Did the Attorney General share that 17 information with you at your dinner? 18 <b>A. I can't remember in what way. As I said,</b> 19 <b>it's inconceivable that he did not share that,</b> 20 <b>but I can't recollect in what way or which</b> 21 <b>way the discussion took. We used to</b> 22 <b>regularly meet for supper. We became good</b> 23 <b>friends, still are good friends. We'd meet</b> 24 <b>regularly. There's a lot also to discuss about</b> 25 <b>the negotiations coming up, but I suspect --</b></p> <p style="text-align: center;">Page 77</p>	<p>1 <b>have been a dreary night shift.</b> 2 Q. Did the Attorney General share with you 3 the fact that it was six nautical miles either 4 off the Spanish coast or into Spanish waters? 5 <b>A. So, again, I can't remember that he did</b> 6 <b>but it doesn't mean that he did not.</b> 7 Q. Is there any reason why you don't provide 8 the details that you have provided now as to 9 this meeting in your first affidavit to the 10 Inquiry? 11 <b>A. So, this is the -- you mean of our dinner</b> 12 <b>on the...</b> 13 Q. Yes. 14 <b>A. Because I hadn't remembered all the</b> 15 <b>details. I knew we had a dinner, obviously,</b> 16 <b>because that's when we said: I think we need</b> 17 <b>to go and see Mr McGrail again. And again,</b> 18 <b>noteworthy that I still, you know, hadn't had</b> 19 <b>any proactive communications from Mr</b> 20 <b>McGrail, hence asking to see him on the</b> 21 <b>Monday. I suspect it might have been that,</b> 22 <b>you know -- on a Sunday evening, that after</b> 23 <b>we'd finished our meal that there wasn't very</b> 24 <b>much that could not wait until the Monday</b> 25 <b>morning to be reported to London.</b></p> <p style="text-align: center;">Page 79</p>
<p>1 <b>what I do remember about the dinner is a</b> 2 <b>comment I made to the Attorney General as</b> 3 <b>we were leaving, which was my opinion that</b> 4 <b>what had happened in the incident at sea was</b> 5 <b>that on a bored night with not much going</b> 6 <b>on, suspect activity was reported by Windy</b> 7 <b>Hill, the RGP decided to go and have a look,</b> 8 <b>and I remember saying to Michael: and have</b> 9 <b>some fun, Miami Vice style. Which, you</b> 10 <b>know, was what I remember saying to</b> 11 <b>Michael is a sort of drawn recollection from</b> 12 <b>Michael's evidence and thinking about it</b> 13 <b>between now and then.</b> 14 Q. So can you just expand on that a little bit: 15 what you meant by that comment. 16 <b>A. So, I still to this day can't understand why</b> 17 <b>the chase happened. We now know that no</b> 18 <b>part of it was in Gibraltar territorial waters. I</b> 19 <b>am sure we'll come on to that, so I won't --</b> 20 <b>you know, I'll wait for the questioning to go</b> 21 <b>into that a bit detail, but in trying to explain</b> 22 <b>the actions of the RGP all I could come up</b> 23 <b>with was this idea of a boat deciding to go</b> 24 <b>and have some fun, to try and -- you know,</b> 25 <b>bring some interest into what I suspect might</b></p> <p style="text-align: center;">Page 78</p>	<p>1 Q. Was this the first time that you'd been 2 told information about the location? At that 3 dinner. 4 <b>A. I can't believe that I wouldn't have been</b> 5 <b>told, but as I said I can't remember bring into</b> 6 <b>my memory, you know, because I think I'd</b> 7 <b>have probably knocked my bottle of beer</b> 8 <b>over whether -- I'd have been shocked and</b> 9 <b>surprised, having been told, and firmly</b> 10 <b>having the impression of Mr McGrail, 'could</b> 11 <b>be in', 'could be out', in my mind.</b> 12 Q. Were you angry about the disparity of the 13 information, between what was being told to 14 the Attorney General and what you were 15 receiving? 16 <b>A. I'd be surprised if I wasn't. The caveat is</b> 17 <b>that I don't really do anger. I get frustrated,</b> 18 <b>but I'm relatively calm most of the time.</b> 19 <b>Very little angers me or annoys me. That</b> 20 <b>tends to come later, when I do deeper</b> 21 <b>thinking on an issue. So, I suspect my anger</b> 22 <b>came perhaps the next day, or the day after,</b> 23 <b>or subsequently.</b> 24 Q. Your evidence is that you agreed to seek 25 more details from Mr McGrail because of the</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

1 Spanish negotiations. Why was location  
 2 relevant to those negotiations? Perhaps an  
 3 obvious question, but it would be good to get  
 4 your explanation.  
 5 **A. Yeah. As we know, the -- one of the main**  
 6 **issues around the difference of opinion of**  
 7 **which we're certain and Gibraltar's certain --**  
 8 **the UK -- is over territorial waters. Having**  
 9 **done numerous incursion-reporting briefs**  
 10 **and note verbales to the Spanish protesting**  
 11 **incursions, I knew the sensitivities about the**  
 12 **waters. It would be fundamental, and in**  
 13 **terms of negotiations that were, you know,**  
 14 **progressing, you know, slowly but surely, the**  
 15 **last thing we needed was a curveball like this**  
 16 **to knock them off-kilter.**  
 17 Q. But your position is that despite the  
 18 obvious impact that it would have had to  
 19 learn of this information, you do not have a  
 20 recollection of learning about it from...  
 21 **A. On Sunday night, from the Attorney**  
 22 **General.**  
 23 Q. Yes.  
 24 **A. That's correct I'm afraid, yeah.**  
 25 Q. Can we now go to B1748, please. Sorry,

Page 81

1 but just focusing on that: nevertheless, you  
 2 do remember the "Miami Vice"...  
 3 **A. Yeah, I do. And it actually -- again, I'm**  
 4 **trying not to sort of impose a memory on**  
 5 **myself, but I sort of link the "Miami Vice" to**  
 6 **the Life on Mars Sweeney comment from the**  
 7 **MOD, and I suspect that might be**  
 8 **subliminally where my -- and I apologise for**  
 9 **being slightly flippant on such a serious**  
 10 **incident, but that's I suspect where that**  
 11 **"Miami Vice" comment from me came from.**  
 12 Q. If we look at -- on screen we have got an  
 13 email from you on 9 March 2020 at 7.57 in  
 14 the morning. And you say, "There may be  
 15 complications around yesterday's incident, in  
 16 that it might have happened as much as six  
 17 miles inside Spanish waters. If true, it's hard  
 18 to fathom quite what the RGP were doing  
 19 chasing a vessel so deep into Spanish waters,  
 20 and one can only hope that it was at the  
 21 invitation of the Spanish. That this may be  
 22 why GoG have kept details very close and  
 23 have asked for no social media speculation,  
 24 the only comment so far", we can skip over  
 25 that. Then, "Let's hope this is all resolved

Page 82

1 quickly between the agencies, and that there  
 2 is no negative impact on Thursday's talks  
 3 with the Spanish." Was this information the  
 4 information that you had learnt from the  
 5 Attorney General?  
 6 **A. I think it was, but I think it was**  
 7 **reinforced that morning. I've a memory of**  
 8 **one of my colleagues mentioning it to me,**  
 9 **that the chase was outside. And forgive me if**  
 10 **I don't get the exact statement --**  
 11 THE CHAIRMAN: This signal to the  
 12 Foreign and Commonwealth Office, you sent  
 13 at 07.57. That is very early in morning, eight  
 14 o'clock in the morning.  
 15 **A. I was regularly in by half six, seven in the**  
 16 **morning.**  
 17 THE CHAIRMAN: Okay.  
 18 **A. I think one thing to say at the time is that**  
 19 **we were -- the convent was one down: we**  
 20 **had no Governor, I was Governor. There is**  
 21 **no such thing as Interim Governor, although**  
 22 **we use that; I'm quite happy with that. There**  
 23 **was a great deal of work, as the Chief**  
 24 **Minister and others have alluded to, going**  
 25 **on. But yes, the point is taken, it was early in**

Page 83

1 **the morning. Especially as London are an**  
 2 **hour behind us.**  
 3 Q. Sorry, you were just explaining...  
 4 **A. Yeah, so I think Mr McGrail made a**  
 5 **statement that it must have been him, and the**  
 6 **Chief Minister and the AG who told me,**  
 7 **because only they knew. And that, I'm afraid,**  
 8 **isn't true. Because the initial suspicious**  
 9 **activity was called in from Windy Hill signal**  
 10 **station by two members of the Gibraltar**  
 11 **Defence Police, who I think I named in some**  
 12 **of the witness. So Windy Hill knew, and it**  
 13 **would have perhaps more than two people**  
 14 **there. There would have been a shift change**  
 15 **early in the morning, they would have**  
 16 **reported up to BFG and MOD. The Port**  
 17 **Authority knew, the Spanish knew. And I**  
 18 **believe Windy Hill -- I'm not sure of the**  
 19 **timing, but they couldn't track because the**  
 20 **AIS was turned off, but they did have a**  
 21 **thermal image camera recording of it and**  
 22 **they'd managed to do a loose triangulation**  
 23 **and plotting based on other ships that were**  
 24 **anchored. And I think that goes back to one**  
 25 **of my central points, if I may: I didn't need**

Page 84

<p>1 <b>the exact locations, all I needed was, you</b></p> <p>2 <b>know, beyond reasonable doubt that the</b></p> <p>3 <b>incident happened inside Spanish waters.</b></p> <p>4 <b>(11.52)</b></p> <p>5 Q. Are you saying that Windmill Hill</p> <p>6 reported this to you before 0757?</p> <p>7 <b>A. No, it didn't come to me via Windmill</b></p> <p>8 <b>Hill. I have a vision of one of my colleagues</b></p> <p>9 <b>in the office, whether I mentioned to him that</b></p> <p>10 <b>I had spoken to the Attorney General the</b></p> <p>11 <b>night before or whether the Gibraltar port</b></p> <p>12 <b>authority knew, whether the Spanish coastal</b></p> <p>13 <b>agencies knew, whether somehow that had</b></p> <p>14 <b>got into some guy I was with that morning</b></p> <p>15 <b>but it did seem to confirm things to me but,</b></p> <p>16 <b>notwithstanding that, I would have reported</b></p> <p>17 <b>the meeting with Michael and I would</b></p> <p>18 <b>normally have done a bit more than that, so I</b></p> <p>19 <b>think that was something that I just wanted to</b></p> <p>20 <b>get into London quickly before I started the</b></p> <p>21 <b>rest of the day.</b></p> <p>22 Q. Presumably the second hand information</p> <p>23 that you are referring to would not have</p> <p>24 disclosed, for example, that the incident</p> <p>25 might have happened as much as six miles</p> <p style="text-align: center;">Page 85</p>	<p>1 you to, you say, "Morning, I was with the</p> <p>2 AG last night and we wondered whether it</p> <p>3 would be worth having an update at some</p> <p>4 stage later this morning. We're keen to reach</p> <p>5 out to Spain given talks this weekend in</p> <p>6 London, please protect." You did not in that</p> <p>7 message say to Mr McGrail what you had</p> <p>8 reported to the FCO. Why did you not do</p> <p>9 that?</p> <p>10 <b>A. I don't know. I tend to just, with</b></p> <p>11 <b>WhatsApp, be very brief, very pithy and very</b></p> <p>12 <b>precise. I don't send long messages, long</b></p> <p>13 <b>emails, long WhatsApps, long letters or</b></p> <p>14 <b>submit long evidence.</b></p> <p>15 Q. Would you agree that the tone of your</p> <p>16 message, "We wondered whether it would be</p> <p>17 worth," is quite relaxed and does not express</p> <p>18 any dissatisfaction or concern?</p> <p>19 <b>A. Yes, I mean, I said that --- that is just the</b></p> <p>20 <b>diplomatic trade craft I've been involved in</b></p> <p>21 <b>for 40 years. "Wondered whether it would</b></p> <p>22 <b>be worth having" is, "I'd like to come and see</b></p> <p>23 <b>you, please."</b></p> <p>24 Q. Can we look at your second statement at</p> <p>25 paragraph 19.4 please, A264? You say in</p> <p style="text-align: center;">Page 87</p>
<p>1 inside Spanish waters? It is not clear how ---</p> <p>2 -</p> <p>3 <b>A. No, I think that's probably fair enough</b></p> <p>4 <b>but, as I have said, Windmill Hill do have the</b></p> <p>5 <b>ability to plot approximately without AIS and</b></p> <p>6 <b>GPS.</b></p> <p>7 Q. Is there a reason why you did not refer to</p> <p>8 the Windy Hill exchange in your evidence?</p> <p>9 <b>A. Yes, there was actually. I was always</b></p> <p>10 <b>under the impression that there were</b></p> <p>11 <b>sensitivities around elements of that</b></p> <p>12 <b>operation and of course it was just again on</b></p> <p>13 <b>poring through the evidence and then seeing</b></p> <p>14 <b>the six phone calls between Windy Hill and</b></p> <p>15 <b>the PMB or, you know, reporting the</b></p> <p>16 <b>collision to Windy Hill and backwards, so</b></p> <p>17 <b>there was certainly enough information</b></p> <p>18 <b>within what I recall the MOD family, for</b></p> <p>19 <b>want of a better word that would firmly allow</b></p> <p>20 <b>people to draw a conclusion that would be</b></p> <p>21 <b>hard to argue against that the incident took</b></p> <p>22 <b>place inside Spanish waters.</b></p> <p>23 Q. Can we now go back to B85, which is</p> <p>24 your exchanges with Mr McGrail and focus</p> <p>25 on the same message that I already referred</p> <p style="text-align: center;">Page 86</p>	<p>1 your second statement, "Furthermore, this is</p> <p>2 ..." I should take you to the top of the page at</p> <p>3 19, "I note that a general theme running</p> <p>4 throughout McGrail 3 is that Mr Llamas, the</p> <p>5 AG, was my legal adviser and that I am,</p> <p>6 therefore, assumed that the AG was relaying</p> <p>7 to me all the information that IM was passing</p> <p>8 to the AG including information about the</p> <p>9 location of a collision on a timely basis. As</p> <p>10 to this I comment as follows," and then at</p> <p>11 19.4 you say, "Furthermore, the AG is not</p> <p>12 the Governor's lawyer in the sense of a</p> <p>13 solicitor/client relationship in a matter such</p> <p>14 that information conveyed to the solicitor is</p> <p>15 thereby conveyed to the client. The AG is a</p> <p>16 legal adviser to the Governor in the sense</p> <p>17 that he provides legal advice to the Governor</p> <p>18 on matters of Gibraltar law and constitution</p> <p>19 as the Governor may request of him.</p> <p>20 Information conveyed to the AG is not</p> <p>21 thereby conveyed to the Governor nor can</p> <p>22 anybody reasonably assume that whatever is</p> <p>23 said to the AG will be conveyed by him to</p> <p>24 the Governor. I knew that I was repeatedly</p> <p>25 myself asking him for this information</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 directly. He could not, therefore, reasonably 2 have thought that he was discharging his duty 3 to me by assuming that information, different 4 to that which he was providing to me 5 directly, would reach me indirectly through 6 the AG. In my opinion, this is simply 7 disingenuous." Do you consider that that 8 reasoning still applies in circumstances 9 where you expressly told Mr McGrail that 10 you had met with the Attorney General the 11 previous evening? 12 <b>A. Well, as I have previously stated, we used 13 to meet regularly. There was a great deal of 14 work to discuss not least the negotiations, so, 15 I mean, that statement is true, yes.</b> 16 Q. It turns out, however, that Mr McGrail 17 was correct to assume that the Attorney 18 General would pass the information to you if 19 he did so that evening. Is that not right? 20 <b>A. Yes, you could make that assumption but 21 my point is that I needed, wanted and so 22 should have happened, Mr McGrail should 23 have told me directly himself when I asked 24 and he should certainly not have misled me 25 on the Sunday when I cleared a draft email I</b></p> <p style="text-align: center;">Page 89</p>	<p>1 <b>switched off and I was struck by "switched 2 off."</b> 3 Q. We will come to AIS in a moment, I am 4 just focusing on location. Why at that point 5 ---- sorry, why at that point were you not 6 direct with Mr McGrail that you now knew 7 the collision was up to six nautical miles into 8 Spanish waters? 9 THE CHAIRMAN: Or at least had been 10 told? 11 MR SANTOS: (To the witness): Or had 12 been told? 13 <b>A. I don't have an answer to that. It's 14 something that I have asked myself and I can 15 accept the suggestion that I should have been 16 more forceful and directive and more open 17 with Mr McGrail and said that I had had 18 information that sort of quite clearly puts the 19 incident inside Spanish waters.</b> 20 Q. Would that not have been a natural thing 21 to do rather than sit on the information that 22 you had obtained? 23 <b>A. Yes, it would and, with hindsight, as I 24 have said, I wished I had approached that 25 meeting differently.</b></p> <p style="text-align: center;">Page 91</p>
<p>1 <b>was sending to London on the most 2 important issue of the day. That Sunday 3 rather than generally.</b> 4 Q. If we can go to A252 now, your 5 statement at paragraph 25.6, you say, "On 9th 6 March the Attorney General and I met Mr 7 McGrail at NMH. I again asked Mr McGrail 8 about the location of the incident. Mr 9 McGrail said he was still not sure." Was it 10 just you, the Attorney General and Mr 11 McGrail at this meeting or do you recall 12 Superintendent Richardson also being there? 13 I recall somebody else being there but I 14 wouldn't with all certainty be able to say 15 who. I think people were coming in and out 16 as well, which might have sort of affected my 17 recollection. 18 Q. Can you please be as precise as possible 19 about your question to Mr McGrail and his 20 response to that question? 21 <b>A. It is as it is in the statement. That's 22 almost a verbatim --- I couldn't understand 23 why --- and I'm not technical so GPS, AIS, 24 you know, could not provide the information, 25 Mr McGrail replied that they had been</b></p> <p style="text-align: center;">Page 90</p>	<p>1 Q. Do you accept that if you had raised what 2 you knew with him, he would have been able 3 to provide you with better information? For 4 example, clarifying that the collision was not 5 six nautical miles into Spanish waters but, 6 rather six nautical miles off the coast? 7 <b>A. It would have and that is absolutely sure. 8 As I said, my interest was not the exact 9 location, my interest was inside or outside 10 and clearly inside Spanish waters or outside 11 British Gibraltar territorial waters.</b> 12 Q. If we look at paragraph 25.8 of your 13 statement, you say, "My strong sense and 14 suspicion at the time that Mr McGrail was 15 answering my questions prior to 11 March 16 about the location of the incident was that Mr 17 McGrail was deliberately withholding from 18 me important information about the nature of 19 his understanding of the location of this 20 incident, which were matters of prime 21 importance to myself as Governor and to 22 HMG in terms of our responsibility for 23 Gibraltar's external affairs. My suspicions 24 were later confirmed when I discovered from 25 sight of the Section 15 Report prepared by</p> <p style="text-align: center;">Page 92</p>

1 Mr McGrail for the Chief Minister, that Mr.  
 2 McGrail had information, very early on 8  
 3 March, just a few hours after the incident,  
 4 which suggested, and that had caused him to  
 5 believe with reasonable clarity, that the  
 6 incident had occurred well inside Spanish  
 7 Waters." You refer to your strong sense of  
 8 suspicion at the time, so why did you not  
 9 raise your suspicion directly with Mr  
 10 McGrail at the time?  
 11 **A. Again, it goes back to with hindsight; if I**  
 12 **had asked that question, if I had put to him**  
 13 **what I knew, I think it may be an influence**  
 14 **from the Sunday, the previous day where Mr**  
 15 **McGrail had the opportunity to fully disclose**  
 16 **what he knew. That was an oversight on his**  
 17 **part of such significance and magnitude that I**  
 18 **really found it quite hard and still do to**  
 19 **understand why Mr McGrail didn't tell me**  
 20 **that and the only conclusion --- there are only**  
 21 **two options, I think; either there was this**  
 22 **massive oversight or it was deliberate.**  
 23 **Perhaps, you know, again with hindsight I**  
 24 **might have said that it was either deliberate**  
 25 **or a massively significant oversight on the**

Page 93

1 **Sunday, 8 May.**  
 2 Q. Was it the case perhaps of you and the  
 3 Attorney General deciding to test Mr  
 4 McGrail and see how long he took to tell you  
 5 the information that you already knew?  
 6 **A. So I have never thought of that until you**  
 7 **put the question to me. It's not the way I**  
 8 **operate. I am normally quite straight which I**  
 9 **know is a slight contradiction to what I have**  
 10 **said and accepted that I should have been**  
 11 **more directive with what I knew to Mr**  
 12 **McGrail but I am not Machiavellian.**  
 13 Q. If we can go back to paragraph 25.6,  
 14 picking up from where we left off and the  
 15 part that you were referring to about AIS,  
 16 you said, "I queried why the GPS/AIS  
 17 systems could not provide this information.  
 18 Mr McGrail replied that the instruments had  
 19 been switched off. I  
 20 asked why the officers would do that. Mr  
 21 McGrail replied, 'You know what it is like in  
 22 the heat of the moment.' I said I did not,  
 23 adding that surely Standard Operating  
 24 Procedures dictated that such equipment  
 25 should always be on. I said this was a vitally

Page 94

1 important issue given the state of the  
 2 negotiations with Spain." Mr McGrail denies  
 3 saying that. Do you stand by your evidence?  
 4 **A. Yes, I do.**  
 5 Q. Have you heard about any practice of  
 6 AIS being switched off?  
 7 **A. So I have a vague recollection before I**  
 8 **read the SOLIS report of RGP vessels, again**  
 9 **part of this anecdotal story, evidence,**  
 10 **narrative around the RGP, of RGP incursions**  
 11 **into Spanish waters and I was struck on**  
 12 **reading through the evidence of procedures**  
 13 **and I think within 18 months or so before the**  
 14 **runaway incident, I think actually possibly**  
 15 **two or three years before. Over a period of**  
 16 **18 months I think three separate sets of**  
 17 **instructions not to go outside BGTW were**  
 18 **issued. I can only conclude that the**  
 19 **frequency of those instructions being issued**  
 20 **was because, you know, incursions into**  
 21 **Spanish waters were still happening perhaps**  
 22 **and I think the SOLIS report managed to**  
 23 **work out that there had been two**  
 24 **transgressions.**  
 25 THE CHAIRMAN: (To the witness): This

Page 95

1 incursion was one of them.  
 2 **A. Okay.**  
 3 MR SANTOS: This was one of --- it may  
 4 have been one of two, I think.  
 5 THE CHAIRMAN: (To the witness): Yes,  
 6 one of two.  
 7 **A. Okay, I take the correction, thank you.**  
 8 THE CHAIRMAN: That is how I remember  
 9 it anyway.  
 10 MR SANTOS: I think that is right, yes,  
 11 although it was accepted in evidence that AIS  
 12 would have to be switched on for that to be --  
 13 --  
 14 THE CHAIRMAN: Yes, correct.  
 15 MR SANTOS: --- determined. (To the  
 16 witness): If we can look now at C3278,  
 17 please, this is an email from you later that  
 18 day at 4.42 and you say, "The AG and I  
 19 received a further briefing from the  
 20 Commissioner of Police this morning at my  
 21 request; headlines are as follows," and if we  
 22 go to the fourth paragraph, the largest one,  
 23 halfway down, there is a sentence that starts,  
 24 "The RGP helmsman did not full report the  
 25 start of the chase to Obs Centre as per SOPs.

Page 96



<p>1 CoP brushed this off to an oversight due to 2 the pressure of the moment. I was less 3 forgiving." Are you sure that your memory 4 of Mr McGrail referring to the heat of the 5 moment was about AIS and not to the 6 helmsman failing to report the start of the 7 chase as you refer to here? 8 <b>A. So this is the benefit you have with 9 forensic examination whereas I only have my 10 memory. You could be right. I could be 11 conflating the two issues. I apologise if I do 12 but the point is that issues of significant 13 importance were brushed off to an oversight, 14 so, with respect, which issue it was, given 15 that both were quite substantial issues, is 16 relevant but for me not pivotal.</b> 17 Q. If there had been an exchange in relation 18 to AIS where he had said something along 19 those lines, the heat of the moment, the 20 pressure of the moment, do you think that 21 you would have recorded it in this email? 22 <b>A. Yes, I think that's --- I can accept that.</b> 23 Q. Can we now go to B5736, please, this is 24 Superintendent Richardson's note of the 25 meeting and I just want to focus on two items</p> <p style="text-align: center;">Page 97</p>	<p>1 <b>was that at the time we thought that was the</b> 2 <b>case and that was quite important and there is</b> 3 <b>an important point in my mindset and</b> 4 <b>thinking around that, which is that if the</b> 5 <b>chase started in and around Gibraltar waters,</b> 6 <b>then I think it may have leant me towards</b> 7 <b>being more sympathetic with the</b> 8 <b>Commissioner's view that it could be in or it</b> 9 <b>could be out, in terms of --- and we have a</b> 10 <b>different definition of the word "incident"</b> 11 <b>which I am sure you will come to as well.</b> 12 Q. If we can go back to 3278, which we 13 were looking at previously, was this email 14 prepared on the basis of your recollection of 15 the meeting or was it based on a note that 16 you were taking at the time of the briefing? 17 <b>A. I am sorry, can you repeat that question</b> 18 <b>so that I can get the ----</b> 19 Q. This is an account of that briefing ---- 20 <b>A. Yes.</b> 21 Q. Did you take a handwritten note or a 22 typed note during the course of the briefing 23 or was this what you typed up afterwards? 24 <b>A. No, this what I typed out afterwards.</b> 25 Q. If we go to the bottom of the email, the</p> <p style="text-align: center;">Page 99</p>
<p>1 in the final entry at 1210, which refers to a 2 meeting between you and the Attorney 3 General and the Commissioner of Police. 4 The second bullet point says, "Exact 5 coordinates of collision still not determined." 6 Do you recall Mr McGrail or Superintendent 7 Richardson also saying something to that 8 effect? 9 <b>A. They undoubtedly did. I do recall the 10 expression "we're still not certain where it 11 is," and I accept the word "certain" means 12 different things to different people and within 13 the context of what I was looking for, so, yes, 14 the exact coordinates still not determined.</b> 15 Q. Would that suggest that there was a more 16 high level discussion as to the rough location 17 of the collision in the meeting? 18 <b>A. So again a question I have not thought of 19 until now, I think undoubtedly that must be 20 the case, so the same point that it says, "ten 21 minute chase in and around British Gibraltar 22 waters."</b> 23 Q. Yes. 24 <b>A. I believe at the time, which was a key 25 point that the Attorney General focused on,</b></p> <p style="text-align: center;">Page 98</p>	<p>1 last sentence you say, "I suspect this is as 2 much as we will get until the investigation, 3 including the interviews of the RGP and the 4 mining of phones and IAS have been 5 completed." Could your reference to IAS be 6 a typographical error and a reference to AIS? 7 Or is that something that ---- 8 <b>A. Yes, yes.</b> 9 Q. Was it your understanding that AIS could 10 be mined even if it was switched off or does 11 this suggest that AIS was still something that 12 was on the cards at the time? 13 <b>A. Well, it must have been turned off at 14 some stage; therefore, there was still relevant 15 evidence into the mining of the AIS.</b> 16 Q. If we can go to A254 now, please, your 17 paragraph 25.8.(iv), I want to pick it up from 18 about six lines down, "He had thereby caused 19 me to report to London on the basis of 20 incomplete, indeed erroneous information 21 and less information than was then available. 22 Copies of my email to London dated 8 March 23 2020 at 14:09 is at NPI/141, and my email 24 dated 9 March 2020 at 16:42 is at NPI/142." 25 You have already said that the 8 March email</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 was erroneous and incomplete, so what about 2 your email of 9 March which we have just 3 been looking at? Do you consider that to be 4 erroneous and incomplete? 5 <b>A. No, I think what I was trying to say was 6 the difference between my email dated 8 7 March, which was on the basis of incomplete 8 information, as opposed to my email on 9 9 March which is the first time that I had 10 confirmed suspicions to London that the 11 incident happened inside Spanish waters.</b> 12 Q. If we can go to C3294 now, please, this is 13 an email from you to Mr McGrail on 10 14 March at 1.36 and it is an exchange about Mr 15 McGrail's efforts to source out an 16 independent investigation team with the Met 17 Police. Do you agree that you and Mr 18 McGrail appear to be cooperating well in 19 these emails? 20 <b>A. Of course, yes.</b> 21 Q. At this stage it does not appear that you 22 are raising what you knew about location 23 with him still. Is that correct? 24 <b>A. I think I had already had it confirmed in 25 my mind, if not in other ways, that the</b></p> <p style="text-align: center;">Page 101</p>	<p>1 probable that it did occur outside BGTW. 2 Did this take the matter any further for you 3 than what the Attorney General had told you 4 on the night of the 8th? 5 <b>A. No, it didn't, but I was wanting to hear 6 from --- unequivocally from Mr McGrail 7 himself rather than from others.</b> 8 Q. So did this bring you up to the level of 9 your understanding in terms of information 10 received from the Commissioner of Police 11 that you had gathered from the Attorney 12 General and from Windmill Hill? 13 <b>A. Yes, I think it did. I wished that on the 14 Sunday I had been shown the map or been 15 given the coordinates. That would have 16 saved all of this and I accept that at times, as 17 I have said before, that I perhaps could have 18 been more precise and more decisive and 19 more forthcoming with Mr McGrail what I 20 knew but I really did want to hear from the 21 Commissioner of Police to the Governor 22 formally the information that was relevant.</b> 23 Q. If we go to B1761, an email from you on 24 12 March at 8.49 to a contact, presumably at 25 the FCO, it is just the fourth paragraph that I</p> <p style="text-align: center;">Page 103</p>
<p>1 <b>incident had happened inside Spanish waters.</b> 2 Q. If we go to B1351, the first new message 3 on that page on 11 March at 6.58, this is a 4 message between you and Mr McGrail and 5 you say, "Ian, good to hear about progress re 6 Met help. Are we any clearer as to where 7 collision took place? London are keen to 8 know whether it was inside or outside 9 BGTW and, if the latter, approximately by 10 how far," and Mr McGrail responds, "Nic, 11 we're getting there on establishing exact 12 coordinates of where collision took place. 13 We're tying up some loose ends and probing 14 further from WHSS. I should be able to 15 confirm soon. It is highly probable that it did 16 occur out BGTW. We're getting plotted 17 which will provide us better understanding in 18 terms of distance from BGTW," and you 19 respond --- sorry, and then there's an email -- 20 - a message between the Commissioner of 21 Police and the Attorney General below. 22 Again, at this point you did not share with 23 the Commissioner of Police your 24 understanding but the Commissioner of 25 Police does point out to you that it is highly</p> <p style="text-align: center;">Page 102</p>	<p>1 want to focus on, where you say, "I have to 2 say I can't quite understand why we still don't 3 definitively know whether the incident took 4 place inside or outside of BGTW, the exact 5 coordinates don't matter at this stage [I think 6 you meant to say]. It's a matter of inside or 7 out. This leaves me worried that it was 8 significantly outside." Had either Mr 9 McGrail or the Attorney General explained 10 to you why the RGP had been unable to 11 confirm the coordinates at this stage? 12 <b>A. No, they hadn't. I think I probably 13 assumed that because the AIS wasn't turned 14 on, that it goes acknowledge to that point on 15 the difference between exact and beyond 16 reasonable doubt as to where.</b> 17 Q. Had Mr McGrail referred to information 18 having been received from the Guardia 19 Civil? 20 <b>A. No.</b> 21 Q. Why did you say that the exact 22 coordinates do not matter? 23 <b>A. Because they don't when it was so 24 significantly outside BGTW, to me that is. It 25 may matter to forensic investigation by the</b></p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

1 **Metropolitan Police and others but given**  
 2 **what I was focusing on, as I have said**  
 3 **previously, the exact location didn't matter.**  
 4 Q. Then just skipping over a paragraph, you  
 5 say, "I copied Michael in should he know  
 6 more than I." If he had known more  
 7 information, does that mean that you would  
 8 have expected him to share it with you at that  
 9 time?  
 10 **A. I think I was probably referring to our**  
 11 **meeting on the Monday rather than the more**  
 12 **general, "Is there anything you're not telling**  
 13 **me, Attorney General," which I would not**  
 14 **suggest to the Attorney General for one**  
 15 **moment.**  
 16 Q. If we can go to B100, this is an update  
 17 provided --- towards the bottom of the page,  
 18 this is an update provided by Mr McGrail to  
 19 a group, a WhatsApp group that you are not  
 20 included in but it is an update on 12 March at  
 21 4.13 and the final paragraph on that page  
 22 says, "In terms of the investigation proper,  
 23 the evidence points at the pursuit and  
 24 collision occurring outside BGTW, not the  
 25 best news we wanted to hear." Then over the

Page 105

1 page, the fourth entry, the Chief Minister  
 2 responds, "Thank you, Ian, location does not  
 3 worry me so much, helps us in a way, will  
 4 discuss directly with you." The Chief  
 5 Minister has explained what he meant by  
 6 saying, "location does not worry me so  
 7 much, helps us in a way," it is at A230,  
 8 paragraph 20 of his second witness  
 9 statement, his second affidavit, he says, "The  
 10 reason I said that the location could help us  
 11 was two-fold; first, in demonstrating to the  
 12 general public in Gibraltar that in some  
 13 instances police cooperation involves cross  
 14 border activity and that our own police may  
 15 stray into Spanish waters in the same way as  
 16 Spanish police often stray into British  
 17 Gibraltar Territorial Waters; secondly, I  
 18 thought that although it would cause huge  
 19 diplomatic issues in the negotiations on foot  
 20 with Spain at the time, it would be helpful in  
 21 showing our Spanish counterparts that our  
 22 police officers were seeking out illicit  
 23 activity." Do you agree with the Chief  
 24 Minister's reasoning in that in those  
 25 paragraphs?

Page 106

1 **A. I do. I would probably have added a**  
 2 **third, which was that it would also**  
 3 **demonstrate in the aftermath cooperation**  
 4 **between Gibraltar and Spain determining**  
 5 **how the accident happened, so a further**  
 6 **example of the good cooperation between**  
 7 **authorities.**  
 8 THE CHAIRMAN: (To the witness): I  
 9 think he also said in his oral evidence that he  
 10 was making the best of a bad job.  
 11 **A. Yes.**  
 12 MR SANTOS: Yes, I think that is right. (To  
 13 the witness): If we can look at A83, please,  
 14 and the final paragraph on that page, this is  
 15 Mr McGrail's third affidavit and paragraph  
 16 92, he says, "At 1614 hrs [and this is on the  
 17 same day, 12 March] I texted NP asking him  
 18 whether he could take a call. I have no  
 19 written record of this call but it was to update  
 20 him in the same vein as I had done with the  
 21 other officials in the 'Maritime Incident'  
 22 group chat [that is the WhatsApp that we  
 23 have just been looking at]. I spoke to him  
 24 later on the phone and updated him,  
 25 accordingly, including informing him that the

Page 107

1 evidence pointed to both the pursuit and  
 2 collision occurring outside BGTW. This was  
 3 the first occasion I had verified information/  
 4 evidence that the collision had taken place  
 5 outside BGTW." You agree that this update  
 6 took place in your evidence so did Mr  
 7 McGrail share on that call what new  
 8 information or evidence had triggered this  
 9 update?  
 10 **A. I don't recall with any clarity, let alone**  
 11 **great clarity, the nature of the phone call but**  
 12 **it would obviously have been to discuss the**  
 13 **incident.**  
 14 Q. Once Mr McGrail had brought you up to  
 15 speed on location did you raise with him the  
 16 fact that you had known since the 8th the  
 17 approximate location of the collision?  
 18 **A. No, I don't think I ever raised that with**  
 19 **him.**  
 20 Q. If we can look at 25.8(vi) at A254, you  
 21 also refer to a debrief where you say, "I had  
 22 in fact learned on either the 18th or 19th  
 23 March from a debrief by Acting Detective  
 24 Superintendent Gary Smith of the  
 25 Metropolitan Police that 'All indications were

Page 108

<p>1 that the incident had happened in Spanish 2 waters possibly up to 3 miles out of BGTW' 3 and subsequently, on 20th March, wrote a 4 note of the debrief." If we go to A1054, this 5 is Detective Superintendent Smith's evidence 6 and at paragraph 32 he says, "I regularly 7 briefed with PC. From memory I had no 8 contact with Nicholas Pyle but did meet with 9 his successor David Steel, Commander in 10 Chief, during the August deployment. Once 11 again we discussed the complexities of 12 criminal charges due to the alleged activity 13 and jurisdictional issues." So he says that 14 from memory he had no contact with you and 15 went through Mr Culligan. Do you agree 16 with that or do you recall a direct briefing 17 from him? 18 <b>A. So there is a sort of two --- there are two 19 sides to this. No contact is not true but did 20 he brief me fully? No. As I have said, the 21 Convent was under a great deal of pressure at 22 the time. We had many things on our plate. 23 I am one person down as we were awaiting 24 the arrival or news of when Sir David would 25 arrive and I remember meeting Mr Smith in</b></p> <p style="text-align: center;">Page 109</p>	<p>1 <b>A. No, I ---</b> 2 Q. You do not have any specific reasons for 3 saying 18 or 19? 4 <b>A. No, it could be a slip of the pen, it could 5 be that we had the debrief and the report was 6 written on the next day in the day slip but I 7 think the important thing there is Mr Culligan 8 saying, "We had a debrief," which I think 9 confirms that I did indeed meet Gary Smith 10 although, as I said, I wasn't there for anything 11 but the opening remarks of the briefing.</b> 12 Q. And that refers to the indications being 13 that the incident had happened in Spanish 14 waters, possibly up to three miles out of 15 BGTW, did you raise that with Mr McGrail? 16 <b>A. No, I didn't raise any issues pertaining to 17 location with Mr McGrail after his 18 WhatsApp on the Wednesday saying, 19 "Highly probable."</b> 20 Q. If we can now go to B1934, please, this is 21 an email from you to the Chief Minister, 22 copied to the Attorney General on 29 May 23 2020 at three o'clock. You say, "CM, 24 according to the Spanish NV, the collision 25 took place at ...." and he sets out the</p> <p style="text-align: center;">Page 111</p>
<p>1 <b>Phil Culligan's office where I shook his hand 2 and had an introduction and I was probably 3 there for about two minutes. I had a very 4 good team and a lot of support from the team 5 at the Convent. Phil Culligan was a vastly 6 experienced officer who I admired and 7 respected and still do and was more than 8 capable of handling issues like this and in 9 fact Mr Culligan led for the time he arrived 10 on what I call the operational, tactical 11 engagement with the MOD and the RGP.</b> 12 Q. If we can now look at C4230, this is an 13 email of 21 May 2020 which sets out --- it 14 says, "Nic, as discussed, here is a bullet point 15 record of the rushed initial debrief we had 16 from Acting Detective Superintendent Gary 17 Smith on 20 March," and the penultimate 18 bullet point says, "All indications were that 19 the incident happened in Spanish waters, 20 possibly up to three miles out of BGTW." 21 There appears to be some confusion about 22 the date of the debrief because that refers to 23 20 March and your witness statement says 18 24 or 19 March. Can you shed any light as far 25 as that is concerned or are you ----</p> <p style="text-align: center;">Page 110</p>	<p>1 coordinates, "This appears to be confirmed 2 by the photograph on page 3 of CoP's 3 report/letter to you dated 28 March. The 4 graphic attached shows where those 5 coordinates relate to, not quite where I was 6 expecting the collision to have taken place." 7 If we go over the page, we have a graphic 8 which says that it is 7.5 nautical miles off 9 Europa Point, but it is difficult to see that in 10 relation to waters because we do not have the 11 delineation of the waters. Why do you say at 12 that point on 29 May that it was not quite 13 where you were expecting the collision to 14 have taken place? 15 <b>A. I'm not sure. I think I may have been 16 swayed by the initial reference to one of the 17 people on the boat saying it was off the other 18 side of Europa Point, for want of a better 19 word.</b> 20 Q. When did you --- when were you told 21 about that initial report in terms of Europa 22 Point, the person on the vessel? 23 <b>A. I can't remember, to be honest.</b> 24 Q. These coordinates are, however, 25 consistent with the collision being roughly</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 six nautical miles off Santa Barbara beach 2 though; is that correct? 3 <b>A. That is correct.</b> 4 Q. Your email of 29 May, which we were 5 just looking at on the previous page, refers to 6 NV, a Spanish note verbale, I believe, when 7 was the first time that you read that note 8 verbale? 9 <b>A. I can't remember. I don't think I read it</b> 10 <b>the day it came in, the day I was made aware</b> 11 <b>of it, not least because it was in Spanish and</b> 12 <b>my Spanish is beyond that level of detail</b> 13 <b>which is why I think it was picked up by our</b> 14 <b>Embassy in Madrid and London to work</b> 15 <b>through what that all meant and of course the</b> 16 <b>relationship between the UK and Spain isn't</b> 17 <b>dealt with from Gibraltar, it is dealt with</b> 18 <b>from London.</b> 19 Q. If I can show you C3900, this is a 20 message, an email of 15 May 2020 and it is 21 from someone presumably in London to you 22 and other recipients and under points for 23 action, there is a reference, "The CM 24 mentions a note verbale, it's not clear 25 whether this might have arrived in BE</p> <p style="text-align: center;">Page 113</p>	<p>1 <b>certainly read it and briefed myself on</b> 2 <b>already issues for that --- if we did indeed set</b> 3 <b>up a meeting on the Monday. It may have</b> 4 <b>slipped for whatever reason and, as you can</b> 5 <b>see, that's quite a wide group of people, that</b> 6 <b>was going to be a lot of stake holders</b> 7 <b>involved in that meeting which I think</b> 8 <b>explains the severity of the situation.</b> 9 Q. We have seen that your email is on the 10 Friday --- the previous email that we looked 11 at, B1934, you send that email on 29 May, 12 and then that is a reference to the 13 Commissioner of Police's report to the Chief 14 Minister which had been received in the 15 preceding days. 16 <b>A. Sorry, which email am I looking at?</b> 17 Q. I am sorry, the one which is already on 18 the screen now that we just looked at, where 19 you refer in the second sentence, "This 20 appears to be confirmed by the photograph 21 on page 3 of the Commissioner of Police's 22 report ...." 23 <b>A. I am sorry --- I don't say --- sorry ---</b> 24 Q. The first paragraph --- 25 <b>A. "According the Spanish NV, the collision</b></p> <p style="text-align: center;">Page 115</p>
<p>1 Madrid or from the FMA or in FCO from the 2 Spanish Embassy, I would be grateful if you 3 could check and let me know. I'm conscious 4 today it's a holiday in Spain so BE Madrid is 5 closed. Monday is fine to check this there," 6 and then after the bullet points, "The CM's 7 instincts on handling looks spot on, handling 8 it transparently and being seen to be doing 9 so. Once we've had sight of the note verbale 10 and know what the Spanish are asking, we 11 should have an initial meeting to discuss 12 handling from our end, including what 13 should rightly be left to GoG and what 14 should be done by FCO." I think you said in 15 your previous response that you did not read 16 the note verbale immediately because it 17 would have to explained to you, translated 18 and explained, so you are not able to say 19 between 15th and 29th when in fact you 20 learned the contents of the note verbale? 21 <b>A. I think we would have --- I would have</b> 22 <b>read it in advance of the meeting and of</b> 23 <b>course that is a good example of where</b> 24 <b>decisions and how we progress are taken by</b> 25 <b>London in a consultative way. I had</b></p> <p style="text-align: center;">Page 114</p>	<p>1 <b>took place at ...."</b> 2 Q. And then, "This appears to be confirmed 3 by the photograph on page 3 of the 4 Commissioner of Police's report letter to 5 you." 6 <b>A. Yes, sorry.</b> 7 Q. That is a reference to the section 15 8 report? 9 <b>A. Yes, yes.</b> 10 Q. When was the first time that you read the 11 section 15 report? 12 <b>A. I remember the box being delivered. I</b> 13 <b>remember groaning because it just added to</b> 14 <b>the work load and I am pretty sure I started</b> 15 <b>that afternoon, took the box home and spent</b> 16 <b>Saturday going through it all.</b> 17 Q. If we can look at B1273, please, that 18 email refers to a photograph on page 3 of the 19 report, this is page 3 of the report, and that is 20 the photograph and just to read out what is 21 said about it in the report, going to the 22 previous page, picking it up from three lines - 23 -- picking it up in the final paragraph, three 24 lines in, "At the relevant time, this 25 information was not available to the</p> <p style="text-align: center;">Page 116</p>

29 (Pages 113 to 116)

<p>1 command team as according to the police 2 interceptors AIS had not been activated. 3 This is contrary to standing orders. It was 4 assumed that the collision was likely to have 5 taken place outside of BGTW as the radar 6 screen of the suspect vessel displayed 7 coordinates indicating this but this required 8 technical confirmation," this is the screen 9 which shows that at 3.39 on 8 March 2020 it 10 had those coordinates which roughly match 11 up to the coordinates that were received from 12 the Guardia Civil, in your view would it have 13 been helpful for the RGP to inform you of 14 these coordinates from the suspect vessel, 15 even though they still required technical 16 confirmation? 17 (12.32) 18 <b>A. Absolutely, especially on the point that</b> 19 <b>the co-operation relationship between the</b> 20 <b>RGP and Guardia Civil and the Spanish</b> 21 <b>authorities is good, why would they doubt</b> 22 <b>the information that they were being</b> 23 <b>provided? I accepted they may have needed</b> 24 <b>to go a bit deeper into the precise location,</b> 25 <b>but again in terms of the information I</b></p> <p style="text-align: center;">Page 117</p>	<p>1 the incident of 8 March 2020 does not 2 require explanation. By its own it has raised 3 grave concerns with wide-reaching political, 4 financial, reputational and sovereignty 5 implications. They raise very serious 6 concerns about the leadership at the RGP." 7 Did you raise those concerns about political, 8 financial, reputational and sovereignty 9 implications with Mr McGrail? 10 <b>A. I would have done on 9 March.</b> 11 Q. What about with the GPA at any point 12 prior to this letter? 13 <b>A. Um, certainly to the chairman, Dr Britto,</b> 14 <b>when he came.</b> 15 Q. On the 18th, yes, sorry, I should have -- 16 <b>A. But as Governor I had recused myself</b> 17 <b>from GPA matters outside of engagement</b> 18 <b>with the Chairman.</b> 19 Q. And reading on, you say: 20 "Furthermore, I suspected at the time of the 21 immediate aftermath of the incident that the 22 COP's disclosure of information to me was 23 evasive, in particular in relation to the critical 24 issue of whether or not the incident had 25 occurred within BGTW. I know that when</p> <p style="text-align: center;">Page 119</p>
<p>1 <b>needed I would have thought that would have</b> 2 <b>been enough for them to have passed that on.</b> 3 Q. Just to be clear, these co-ordinates that 4 you are seeing on screen are not the ones that 5 were received from Guardia Civil, these were 6 obtained from the suspect vessel. The screen 7 of the suspect vessel when it was switched on 8 had these co-ordinates on it and they tally 9 roughly with the Guardia Civil evidence. 10 And Chief Inspector Field's evidence to the 11 Inquiry, or Superintendent Field's evidence to 12 the inquiry, was that this photograph was 13 taken on 9 March. Would you have wanted 14 to know that information? 15 <b>A. I think so. I think I would have wanted to</b> 16 <b>know all available information and it would</b> 17 <b>have then been up to me to go through and</b> 18 <b>work out what was relevant.</b> 19 Q. Can we go to C4675 now, please? This is 20 your letter of 3 June to the GPA. We have 21 looked at it once before and it is in response 22 to the Gomez &amp; Co letter of 29 May, which 23 we will come to later. Just the third 24 paragraph on the next page, you say: 25 "In relation to the former, the seriousness of</p> <p style="text-align: center;">Page 118</p>	<p>1 the COP was telling me that it was not clear 2 where the incident had occurred, he was 3 informing the Chief Minister that the incident 4 had indeed occurred outside BGTW. Indeed 5 it occurred some 7.5 nautical miles beyond 6 Gibraltar's baseline and therefore well 7 outside BGTW. I find this evasiveness on 8 a key issue to demonstrate a total lack of 9 respect to the office of Governor, particularly 10 since the COP knew that this was the crucial 11 issue for me and for both the UK and 12 Gibraltar governments as far as diplomatic 13 relations with Spain were concerned." 14 Did you raise this concern with Mr McGrail 15 at the time given that you already had those 16 suspicions? 17 <b>A. No, I don't think I did.</b> 18 Q. And did you raise it with the GPA in your 19 role as Governor? 20 <b>A. I would have raised it with Dr Britto</b> 21 <b>when we met on the Monday.</b> 22 Q. If we can now go to B1441, please. This 23 is the section 15 report, in response to the 24 section 15 report. On 19 May ... sorry, I said 25 it is in response to the section 15 report. This</p> <p style="text-align: center;">Page 120</p>

30 (Pages 117 to 120)

<p>1 is prior to seeking the section 15 report. On 2 19 May you have an exchange with the Chief 3 Minister where he says: 4 "On the other, what is your instinct on the 5 15(1)(a) report? Shall I seek it given Met 6 report is not imminent? I am in two minds." 7 And you respond: 8 "I am sure or hope COP has done his own 9 internal investigation and therefore has 10 an internal report. You could (a) ask on the 11 basis of the claim being filed as the peg or 12 (b) wait until say Friday to see what Joey 13 comes up with. Slight preference to leave 14 this to the GPA but worried they will not be 15 timely enough. Using 15(1)(a) would speed 16 things up and on balance I would go for 17 that." 18 The message suggests that you had 19 previously discussed a section 15 report with 20 the Chief Minister. Did you do so and do 21 you know when that occurred? 22 <b>A. I don't think we did. The Chief Minister 23 and I were in touch daily on many issues, 24 whether it was Covid or (inaudible), the other 25 issues around the negotiations. I think I had</b></p> <p style="text-align: center;">Page 121</p>	<p>1 section 15 might have been referred to? 2 <b>A. Sorry, I think the 15 May was a Friday, 3 not the weekend.</b> 4 Q. Sorry, yes, before the weekend. 5 <b>A. No, I don't believe we got into that. I 6 mean, I'm sure you may ... will you come to 7 that meeting?</b> 8 Q. Yes. Just in terms of your response, 9 breaking it down, you say, from the second 10 line: "You could (a) ask on the basis of the 11 claim being filed as the peg." What did you 12 mean by that? 13 <b>A. Well, that was news that there was 14 a claim being made in Spain on behalf of the 15 relatives. I would have thought again I could 16 make an argument that that alone was 17 sufficient for section 15(1)(a) to be requested 18 given the consequences of that claim being 19 made in the Spanish courts.</b> 20 Q. You refer to the basis of the claim being 21 filed as the peg. Was that a suggestion that it 22 be used as an excuse for making a section 15 23 request? 24 <b>A. No. I mean, the Chief Minister doesn't 25 need an excuse. Perhaps it would have been</b></p> <p style="text-align: center;">Page 123</p>
<p>1 a sense tried a horizon scan, which I know is 2 dangerous, that we would end up with 3 a situation where a section 15(1)(a) report 4 would be needed or would be requested. 5 <b>And I have a vague memory kicking in at the 6 moment that that was part of my reason for, 7 you know, let's just speed it up and on 8 balance go for it, section 15(1)(a).</b> 9 Q. It is just that his message to you says: 10 "What is your instinct on the 15(1)(a) report", 11 which suggests that there has been 12 a discussion. 13 <b>A. Yes. Yes, I get that. I can't remember 14 a prior discussion to it. I'm sure it was raised 15 in the general discussion of where we were 16 going.</b> 17 Q. The Chief Minister has to keep informed 18 of any exercise of by him of a power under 19 section 15 in accordance with section 15.2. 20 Was this what he was doing when you were 21 discussing the section 15 report? 22 <b>A. That's how I took it, yes.</b> 23 Q. Was it at your meeting on 15 May, where 24 you met after the weekend to discuss your 25 respective losses of confidence, that the</p> <p style="text-align: center;">Page 122</p>	<p>1 as the reason for. Um, so I apologise. So 2 again slightly, that is an example where my 3 language would have been tighter. I didn't 4 know this would be forensically examined. 5 Q. Why do you say that the separate issue 6 for the legal claims supported seeking 7 a report on the incident itself? 8 <b>A. Because that was going to bring into 9 question the whole, all of the issues around 10 the incident, which goes back to my 11 comment on the political, the financial, the 12 reputational damage to Gibraltar. I think 13 answers could only be, or responses to 14 anything that might have come from Spain 15 could only be, answered on the back of a full 16 section 15(1)(a).</b> 17 Q. Then you say: "Or (b) wait until say 18 Friday to see what Joey comes up with." 19 What were you envisaging that Dr Britto 20 might come up with by Friday? 21 <b>A. Well, I think we had put Dr Britto on 22 notice and expected the GPA to take forward 23 the process of reflecting on a loss of 24 confidence in the Commissioner of Police. 25 Given that we had given Dr Britto the</b></p> <p style="text-align: center;">Page 124</p>

<p>1 reasons why, given that they should have 2 approached and called in Mr McGrail to give 3 his own representations, perhaps we would 4 have got a bit more information on answering 5 the questions we had around that. But again, 6 I can say this with hindsight, if I had have 7 thought, and again I don't want to overplay 8 this, but a lot of, um, you know, a lot of the 9 stuff we reported to, as you can tell by the 10 timeframe, was quite quick. It doesn't mean I 11 don't reflect on things. Um, but I think I 12 could just deal with this quite quickly and go 13 yes. With hindsight I wouldn't have put in 14 (b) I think. (Pause). For the reason I say 15 there, that it might not be timely enough. We 16 may be waiting, you know, the Spanish 17 claims were already hitting the media. 18 Q. Were you suggesting that if Mr McGrail 19 was invited to retire and did retire it would 20 not be necessary to make the section 15 21 request at all? 22 A. That's a good point. Um, I think I still 23 would have liked to have had all the 24 information, just for my own interest, and at 25 some stage possibly even, you know, quite</p> <p style="text-align: center;">Page 125</p>	<p>1 under section 15(1)(a)." 2 And that is, below, is the response from 3 Mr McGrail. You may be familiar with this 4 exchange but it starts with the Assistant 5 Commissioner, sorry, now Assistant 6 Commissioner, then Superintendent Yeats, 7 writing to the Attorney General seeking the 8 Attorney General's advice and seeking 9 appointment of counsel for the RGP in 10 relation to the claims. That gets forwarded to 11 the Chief Minister, who then applies 12 expressing concern at having only found out 13 from the Attorney General at that stage, and 14 then this is the reply from Mr McGrail. Did 15 you discuss this matter with the Chief 16 Minister again before he made the request on 17 21 May? 18 A. I cannot recall that we did but it would be 19 inconceivable that in our many engagements 20 that we did not. 21 Q. Do you consider that the Chief Minister 22 implied with his obligation under section 15 23 of the Police Act to keep you informed -- 24 A. Absolutely. 25 Q. -- about the exercise of his powers?</p> <p style="text-align: center;">Page 127</p>
<p>1 a few months later. Certainly when the 2 pressure was off I would have enjoyed going 3 through the boxes that I did on that weekend 4 in slower time. 5 Q. Why was your preference to make the 6 section 15 request before the Met team had 7 delivered their report? 8 A. Um, again I think that it was partly time, 9 partly, um, I think the Chief Minister and I 10 needed all the information possible in view 11 of what was happening in Spain, both with 12 the claim and negotiations. And I thought 13 the two things could work in parallel. 14 Q. If we go to C4117, please. (Pause). 15 Thank you. This is an email from the Chief 16 Minister to you on 20 May 2020 at 6.55 and 17 it is about the legal claims arising from the 18 incident at sea. He says: 19 "Please see below which I have just received 20 from the Commissioner of Police. Given the 21 seriousness of the matter I would appreciate 22 the opportunity to discuss with you my 23 intended response. I consider this is 24 a trigger, the only appropriate response to 25 which will be the exercise of my own powers</p> <p style="text-align: center;">Page 126</p>	<p>1 A. Absolutely, at all times. As I have said 2 previously, the Chief Minister and I, which 3 goes back to the point when I was Deputy 4 Governor engaging with the Chief Minister 5 sort of provided the basis for my 6 governorship of having that relationship. It 7 was mutually supportive. We had our areas 8 of disagreement, but on the whole I trusted 9 the Chief Minister implicitly. That does not 10 mean to say that I would accept everything 11 that he said, so I would have reflected, I 12 would have considered, but without doubt on 13 this issue I would have fully agreed with him 14 and endorsed it. 15 Q. Did you see the draft request before it 16 went out? 17 A. No. I don't think there would be a reason 18 to. 19 Q. Are you aware that the Chief Minister 20 consulted the Attorney General on the draft 21 report? 22 A. I would have expected him to have done 23 so. 24 Q. Do you feel that you should have been 25 consulted either as Governor under section</p> <p style="text-align: center;">Page 128</p>



<p>1 15.2 or because you were mentioned in it?</p> <p>2 <b>A. Consulted on the draft?</b></p> <p>3 Q. On the draft.</p> <p>4 <b>A. Um, in an ideal world with lots of time</b></p> <p>5 <b>and less pressure perhaps, but, as I say, given</b></p> <p>6 <b>the way the Chief Minister and I worked</b></p> <p>7 <b>throughout my time in Gibraltar, um, no, I</b></p> <p>8 <b>didn't think it was necessary.</b></p> <p>9 Q. Let us move on now to the HMIC report,</p> <p>10 please. If we can go to C6560. Just before</p> <p>11 we look at this, when did you first receive the</p> <p>12 draft of the HMIC report as far as you are</p> <p>13 aware?</p> <p>14 <b>A. I can't remember the exact date.</b></p> <p>15 Q. If we can look at the entry on 20 April,</p> <p>16 which is at 10.50, this is an exchange</p> <p>17 between Mr McGrail and the Chair of the</p> <p>18 GPA, Dr Britto:</p> <p>19 "FYI I have not shared the report with</p> <p>20 anyone yet but will do so with GPA</p> <p>21 colleagues at the end of play today. I am</p> <p>22 awaiting a response from Governor and will</p> <p>23 wait until end of play today as well, at which</p> <p>24 time I will share a report with the Chief</p> <p>25 Minister, Minister for Justice and His</p> <p style="text-align: center;">Page 129</p>	<p>1 bullying in the force but it did find some</p> <p>2 evidence of bullying and harassment by a</p> <p>3 minority of managers, supervisors and peers</p> <p>4 that was not being reported and consequently</p> <p>5 not addressed. It made recommendations for</p> <p>6 the Commissioner to acknowledge that the</p> <p>7 force takes the Federation's concerns about</p> <p>8 bullying seriously'</p> <p>9 (iv) 'many junior officers perceived that some</p> <p>10 senior officers were sometimes too ready to</p> <p>11 apportion blame when something goes</p> <p>12 wrong'."</p> <p>13 And you say:</p> <p>14 "This represented deterioration rather than</p> <p>15 the expected progress and went some way to</p> <p>16 validating the Gibraltar Police Federation's</p> <p>17 grievances stated above. I believe that these</p> <p>18 differences between the 2016 and 2020</p> <p>19 reports reflected Mr McGrail's management</p> <p>20 style."</p> <p>21 It appears from your evidence that you were</p> <p>22 particularly concerned about the part of the</p> <p>23 report that touched on bullying in the RGP.</p> <p>24 Is that correct?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 131</p>
<p>1 Excellency first thing tomorrow along with</p> <p>2 my recommendations unless I am advised</p> <p>3 otherwise. It goes without saying that I will</p> <p>4 keep you posted."</p> <p>5 So do you think that you received it perhaps</p> <p>6 on 21 April or thereabouts?</p> <p>7 <b>A. Yes, I think that's a logical conclusion. I</b></p> <p>8 <b>am pausing a bit because, um, I'm not sure</b></p> <p>9 <b>whether I would have got the report from any</b></p> <p>10 <b>other source.</b></p> <p>11 Q. If we can look and your evidence at 24.5,</p> <p>12 A250. (Pause). You say:</p> <p>13 "The 2020 Report spoke of:</p> <p>14 (i) '... told by less senior staff that the phrase</p> <p>15 "firm leadership" is occasionally used to</p> <p>16 describe management behaviours that, in a</p> <p>17 small number of cases may have amounted to</p> <p>18 bullying'</p> <p>19 (ii) 'a perception exists among an apparently</p> <p>20 large number of officers that some senior</p> <p>21 officers sometimes behave in an</p> <p>22 unacceptable manner when dealing with their</p> <p>23 staff'</p> <p>24 (iii) 'shortly before our inspection an external</p> <p>25 review concluded that there wasn't systematic</p> <p style="text-align: center;">Page 130</p>	<p>1 Q. Did any other sections of the report</p> <p>2 concern you in particular?</p> <p>3 <b>A. I think the lack of progress since the</b></p> <p>4 <b>previous report, um, so, you know, looking at</b></p> <p>5 <b>the two together. And I think somewhere in</b></p> <p>6 <b>an email exchange I have seen or</b></p> <p>7 <b>a WhatsApp I even went back to a previous</b></p> <p>8 <b>report just to get a comparison. But certainly</b></p> <p>9 <b>in my opinion, you know, there was no</b></p> <p>10 <b>progress or no substantial progress on key</b></p> <p>11 <b>elements of the 2016 report.</b></p> <p>12 Q. In your view was Mr McGrail responsible</p> <p>13 for the criticism in the report, even though he</p> <p>14 had only been in post for a short time?</p> <p>15 <b>A. I think partly. I will say, as I have said</b></p> <p>16 <b>on the other issues, that the HMIC report on</b></p> <p>17 <b>its own wouldn't have caused a loss of</b></p> <p>18 <b>confidence and, as I said in one of my emails,</b></p> <p>19 <b>a lot of the issues, and I know I was, you</b></p> <p>20 <b>know, probably a bit more reactive with my</b></p> <p>21 <b>first email expressing that I didn't think it</b></p> <p>22 <b>should be published, a lot of what was here</b></p> <p>23 <b>should have been, could be, was hopefully,</b></p> <p>24 <b>quite easy to put right. But then, you know,</b></p> <p>25 <b>a lot of the stuff in the 2016 report was quite</b></p> <p style="text-align: center;">Page 132</p>

33 (Pages 129 to 132)

<p>1 <b>easy to put right. And whilst the head of</b>  2 <b>an organisation, whether it's an ambassador</b>  3 <b>or a governor, is responsible and accountable</b>  4 <b>for actions, there is an element of a senior</b>  5 <b>leadership management team in the HMIC</b>  6 <b>report. So I wouldn't like to say that because</b>  7 <b>it only happened, a lot of this was in</b>  8 <b>Commissioner Yome's time, that it didn't</b>  9 <b>reflect down to the senior management team</b>  10 <b>who should also demonstrate correct</b>  11 <b>behaviours, ethics, etc.</b>  12 Q. If we can look at your second statement,  13 paragraph 10, which is A260, please. You  14 say:  15 "As to question of feedback/expressing  16 concerns on the HMICFRIS report, I decided  17 to leave the issue of reacting to the HMIC  18 Report in the first instance to the GPA.  19 Evidence which I have already submitted  20 demonstrates that I did raise comment on the  21 matter to the Chief Minister."  22 We will come to your email of 30 April.  23 Why did you decide to leave the HMIC  24 report, the feedback and expressing concerns  25 on it, to the GPA first and foremost?</p> <p style="text-align: center;">Page 133</p>	<p>1 think it should be published in full. Let's  2 chat tomorrow. Nick."  3 Why did you not think the report should be  4 published in full?  5 <b>A. I think what I should have said ... and</b>  6 <b>again there is a message here in that I sent</b>  7 <b>that email at 19.39. So when the Chairman</b>  8 <b>sort of pointed out that I was in the office</b>  9 <b>very early, I think we have an example here</b>  10 <b>that I was also in the office very late.</b>  11 THE CHAIRMAN: Not by our standards.  12 <b>A. I could answer that, Mr Chairman, but I</b>  13 <b>will not. I don't think it should be published</b>  14 <b>in full until we have had a chance to discuss</b>  15 <b>it and work out how we can handle it. Rather</b>  16 <b>than it shouldn't be published, full stop.</b>  17 MR SANTOS: So was it your view that in  18 the long run it would be better for the  19 recommendations to be aired publicly?  20 <b>A. I have always been open and transparent.</b>  21 <b>I don't believe in holding anything back</b>  22 <b>unless it would impact on foreign relations or</b>  23 <b>security or matters of that dialogue. And</b>  24 <b>something like this, I suspected the</b>  25 <b>population of Gibraltar would question why</b></p> <p style="text-align: center;">Page 135</p>
<p>1 <b>A. Well, I think it was, um, the report was</b>  2 <b>requested on behalf of the Commissioner of</b>  3 <b>Police by the GPA. So they are the</b>  4 <b>penholders, we would say in foreign office</b>  5 <b>speak. And I did say in the first instance. I</b>  6 <b>was going to ... I didn't really want to sort of</b>  7 <b>influence the GPA into its deliberations on</b>  8 <b>what it thought of the report. Rather I</b>  9 <b>wanted the GPA to tell me what it thought</b>  10 <b>and then I could add my own views to that.</b>  11 Q. Did you raise your concerns with the  12 GPA at any point?  13 <b>A. Um, I don't think so. I can't recollect that</b>  14 <b>I did. I don't know whether my email, um, I</b>  15 <b>don't think I would have sent my email to</b>  16 <b>Dr Britto expressing my views. I think I</b>  17 <b>would have, I tried to follow the process I</b>  18 <b>outline here.</b>  19 Q. If we can look at C3343, please. This is I  20 think the email you are referring to.  21 <b>A. Yes.</b>  22 Q. Which is probably the shortest email we  23 have seen in this Inquiry. You say, 29  24 April 2020:  25 "Joey, I have read the report twice. I do not</p> <p style="text-align: center;">Page 134</p>	<p>1 <b>it was not published in full.</b>  2 Q. Do you meet Dr Britto on the following  3 day and discuss it or in the following days?  4 <b>A. Um, I can't recall. We must have because</b>  5 <b>I would not say, "Let's chat tomorrow" and</b>  6 <b>not follow up on that. And actually, as I said,</b>  7 <b>Dr Britto, who I held in very high regard,</b>  8 <b>would not let me off from not chatting</b>  9 <b>tomorrow if I had suggested that to him.</b>  10 Q. When you spoke did you raise any  11 concerns to Dr Britto about Mr McGrail  12 specifically?  13 <b>A. Um, I can't recall but, as Dr Britto said in</b>  14 <b>his evidence, we did used to meet and I did</b>  15 <b>talk to him quite frequently about my view of</b>  16 <b>the RGP as an institution. And of course,</b>  17 <b>you know, an institution is led by its leaders</b>  18 <b>and senior management team, which is where</b>  19 <b>often its behaviours and actions come from.</b>  20 <b>So, maybe not as explicitly as you are asking,</b>  21 <b>but certainly inferring that the issues in the</b>  22 <b>RGP, why I believed it needed to be</b>  23 <b>modernised, actually could only come from</b>  24 <b>its leadership.</b>  25 Q. Did you make any suggestion at this</p> <p style="text-align: center;">Page 136</p>

34 (Pages 133 to 136)

<p>1 point to Dr Britto that you were starting to 2 lose confidence in Mr McGrail? 3 <b>A. No. Not on the matter, not even, because</b> 4 <b>I don't think I had started to draw the threads</b> 5 <b>together of this can't go on, something, you</b> 6 <b>know. The stage I started to get in my mind</b> 7 <b>or believe that a change of leadership was</b> 8 <b>needed, um, was growing, but I didn't have</b> 9 <b>enough weight to even talk through it with</b> 10 <b>the Chief Minister, let alone Dr Britto.</b> 11 Q. This was, however, well after the incident 12 at sea. And you received this report. Were 13 you still not starting to lose confidence? 14 <b>A. So, the incident at sea alone is the only</b> 15 <b>issue that, with respect, matters to me in</b> 16 <b>terms of losing confidence. Looking at the</b> 17 <b>airfield incident, the helicopter, the</b> 18 <b>Federation, the bullying, the reports and this</b> 19 <b>sort of stuff on their own would not cause me</b> 20 <b>to lose because I believed they could be</b> 21 <b>rectified and put right. The incident at sea</b> 22 <b>could not be put right.</b> 23 <b>And if you allow me just a second to speak to</b> 24 <b>that, it is that we have an issue where two</b> 25 <b>innocent people were killed in an illegal</b></p> <p style="text-align: center;">Page 137</p>	<p>1 dated 24 April 2020. Mr McGrail sent this to 2 Dr Britto and the Minister of Justice in late 3 April. Did he also send you this document? 4 <b>A. I don't believe he did.</b> 5 Q. Did he arrange a meeting with you to 6 discuss the report and the response to it? 7 <b>A. No, he did not.</b> 8 Q. If we go to C3344 now, please. This is 9 your email to the Chief Minister on 30 April 10 that we referred to earlier, where you set out 11 your response to the HMIC report. And just 12 picking up from the second paragraph, you 13 say: 14 "Having studied the report I find it to be 15 quite damning and it will need careful 16 handling. In essence HMIC found the RGP 17 to have only met two out of the eight areas 18 for improvement identified in 2016. My own 19 sense is that HMIC were very disappointed 20 indeed to find so little progress had been 21 made since their last inspection. This is 22 a shame and their willingness to help the 23 RGP in the future may have diminished as 24 a result. This is something we must help 25 correct.</p> <p style="text-align: center;">Page 139</p>
<p>1 <b>chase by a vessel that had been weaponised</b> 2 <b>that took place X number of miles, the exact</b> 3 <b>location, inside Spanish waters. For yet there</b> 4 <b>is still to be justice and there is yet to be</b> 5 <b>accountability. And I just do not think and</b> 6 <b>still don't think that that is right. And the</b> 7 <b>question I occasionally ask myself is whether</b> 8 <b>that level of accountability and responsibility</b> 9 <b>would have been different had, for example,</b> 10 <b>everybody in that incident been killed or</b> 11 <b>those on the boat had not been Spanish and</b> 12 <b>had been Gibraltarian. And I think that is</b> 13 <b>what I was beginning to formulate in my</b> 14 <b>mind before I went to see of Chief Minister,</b> 15 <b>which is why I just said earlier that I just was</b> 16 <b>beginning to feel that a change of leadership</b> 17 <b>with the RGP was necessary.</b> 18 Q. If we go to C6729, please. This is ... I am 19 sorry, I do not want to give you a neck ache. 20 <b>A. If you give me a second I will get my --</b> 21 Q. I think we can turn this there. Mr Triay is 22 very adept. This is a steering group road 23 map for the implementation of the HMIC as 24 far as accommodations and new areas for 25 improvement for the Royal Gibraltar Police</p> <p style="text-align: center;">Page 138</p>	<p>1 "But I do not think the issue is as bad as the 2 headline suggests and believe it is an issue of 3 culture and leadership more than anything 4 else. Most of the issues should be relatively 5 easy to fix, though it will take a collective 6 effort, driven bottom up from within the RGP 7 as much as from its leadership, which needs 8 to be both more strategic and directive. 9 Quite simply, as I see it, the RGP needs to 10 modernise in all senses of the word. 11 "But the inspection report will undoubtedly 12 become public at some stage. It is important 13 therefore that we, Commissioner, GPA, CM, 14 Governor, are all ready to respond 15 collectively and as one when it does. This 16 means being up front and honest about the 17 issues and challenges as well as displaying 18 a commitment to put things right if we do 19 not. I think the credibility of the RGP is at 20 risk. Given your preoccupations I am happy 21 to discuss how best to take this forward with 22 the Chair of the GPA and perhaps the Chief 23 Secretary in the first instance. My initial 24 thought is to suggest the Commissioner 25 makes the report public at the same time he</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 publishes his road map on the way forward 2 so being proactive rather than reactive." 3 You say that the report is quite damning. 4 Were you referring to any particular 5 findings? 6 <b>A. No, I think it was quite damning in 7 general.</b> 8 Q. Focusing on that third paragraph, sorry, 9 the third paragraph in the email that starts: 10 "But I do not think the issue is as bad as the 11 headline suggests", do you accept that at this 12 point in time it appears that you were willing 13 to work together with Mr McGrail to fix the 14 issues identified in the report? 15 <b>A. Yes, of course, through the GPA.</b> 16 Q. And you recommend that Mr McGrail 17 should publish the report and his road map at 18 the same time. You have explained your 19 email to Dr Britto on the day before perhaps 20 did not convey all of your thoughts about it. 21 Is it fair to say that by this point you were of 22 the view that at some point it would need to 23 be published? 24 <b>A. Yes. I mean, I think since I sent my 25 missive to Dr Britto I had obviously worked</b></p> <p style="text-align: center;">Page 141</p>	<p>1 best way to do this, which could possibly but 2 not necessarily include a comment from the 3 CM and I. Within this we should also have 4 some standard lines we can all deploy, so we 5 can be consistent in our responses. Again, 6 something for Joey and your team to lead 7 on." If we can then go to C6565. These are 8 WhatsApp exchanges between Mr McGrail 9 and Dr Britto on the same day, and they are 10 discussing getting confirmation from the 11 Chief Minister to publish the report. For 12 example, 14.15. It is a bit lower. Can you 13 see there, 14.15, "Spoke to Nick, who said he 14 would reply to the email agreeing we should 15 go public." "Noted, let's see if that does the 16 trick. No joy on my side, I hope it's not that 17 something is bothering the CM about going 18 public and that it's more to do that he's being 19 busy with other matters to give this 20 attention." "I think it's the second, or Darren 21 will have told me." "Can't Darren also 22 nudge? I'll contact him as well." There is a 23 reference there, in the first message I read 24 out, Mr McGrail says that he has spoken to 25 you. Was that a conversation purely about</p> <p style="text-align: center;">Page 143</p>
<p>1 <b>through the night, long hours, reading it 2 properly so I could send a more considered 3 email to the Chief Minister the next morning.</b> 4 MR SANTOS: Thank you, Mr Pyle. I know 5 that it is one minute past 1, so I think that is 6 probably a good time for us to break for 7 lunch. 8 THE CHAIRMAN: An hour for lunch. 9 <b>A. Excellent.</b> 10 THE CHAIRMAN: Okay. 11 MR SANTOS: Thank you. 12 (13.01) 13 (The short adjournment) 14 (14.00) 15 MR SANTOS: Good afternoon, Mr Pyle. 16 <b>A. Good afternoon.</b> 17 Q. If we can look at C3420, please. On 6 18 May 2020 you email Mr McGrail, expressing 19 your support for his decision to publish the 20 report. You say, "Thank you for this. It is 21 right that we look to get ahead of this and be 22 proactive rather than reactive. Can I suggest 23 therefore that publication of both the report 24 and your statement be arranged as soon as 25 possible. I'm happy for Joey to determine the</p> <p style="text-align: center;">Page 142</p>	<p>1 whether the report should go public, or was it 2 more wide-ranging? Did you go into the 3 substance of the report? 4 <b>A. I don't remember a conversation, so I 5 can't really comment on that. As I said, it 6 doesn't mean to say it didn't happen.</b> 7 Q. Were you aware that the GPA was 8 seeking the Chief Minister's approval for the 9 report to go public? 10 <b>A. No, I wasn't.</b> 11 Q. If we can go to C4677. This is your letter 12 that we have already come to a couple of 13 times, on 3 June. And I want to focus on the 14 paragraph there in the middle of the page, 15 "As a final point on this issue, I would also 16 like to reiterate that these two incidents 17 occurred on the back of a growing unease 18 that I had been feeling over the months. In 19 particular, with the numerous allegations of 20 bullying and mismanagement that I had 21 picked up on. I have also been gravely 22 concerned by the potential for corruption 23 identified in the HMIC report, which has 24 tellingly remained unaddressed by the CoP 25 despite his lawyer's response casting</p> <p style="text-align: center;">Page 144</p>

36 (Pages 141 to 144)

<p>1 aspersions/allegations of corruption against 2 others." Were you saying that the reference 3 to potential for corruption being identified in 4 the HMIC report, " which has tellingly 5 remained unaddressed by the CoP". Were 6 you saying unaddressed since 2016, or 7 unaddressed since the newly received report? 8 <b>A. I think I was probably emphasising that 9 from the newly received report, to be fair.</b> 10 Q. Were you concerned about potential 11 corruption before the 2020 report, or was this 12 the first time it was drawn to your attention? 13 <b>A. No, I'd probably picked up on that before, 14 as part of that sort of noise, to use -- for want 15 of a better word, around issues to do with the 16 RGP.</b> 17 Q. Had you ever discussed the issue of 18 potential for corruption in the RGP within the 19 GPA? 20 <b>A. I don't think so, not formally, specifically, 21 but I'm sure it would have come up at some 22 stage around the general discussion we used 23 to have on such matters.</b> 24 Q. So by late April, early May (which is the 25 exchanges that we have just been looking at,</p> <p style="text-align: center;">Page 145</p>	<p>1 is an exchange that we looked -- a little bit 2 lower, please. This is an exchange that we 3 looked at before, but we focused more on 4 your response. I just want to focus on the 14 5 May 9.49 message that the Chief Minister 6 sent to you. Forgive me for reading it out. 7 "Hi. This article has just appeared. A civil 8 claim has been filed in Spain (in Ceuta) by 9 the families of the deceased in the incident 10 with the RGP off the Eastside. This is 11 obviously going to cause us huge issues. 12 Damages claims, political problems etc. I am 13 totally there to support the officers on the 14 front line. I am starting to have huge 15 concerns about the senior management of the 16 RGP. I will alert to a particular matter when 17 we meet, but in terms of the past few months 18 alone: (i) this case of deaths occasioned 19 outside of BGTW (where the statute gives 20 them no status as police officer; (ii) the 21 HMIC inspection issues; (iii) the Federation 22 bullying allegations; (iv) the runway 23 incident, where we had to go in to bat for 24 them despite all aspects having clearly been 25 mishandled by the RGP (and parts of MoD</p> <p style="text-align: center;">Page 147</p>
<p>1 before and after lunch), you had already had 2 your dealings with Mr McGrail in relation to 3 the incident at sea and the HMIC report. Had 4 you raised with anybody the view that Mr 5 McGrail should no longer continue as 6 Commissioner of Police? 7 <b>A. I have a sense that in one of our regular 8 weekly teleconferences with London, that 9 sort of team videoconference we used to 10 have, that that's when the issue of, you know, 11 what was happening collectively with 12 implications around the RGP, whether it's the 13 press release, the claims, etc. I think I would 14 have raised, you know: there's a concern 15 here. I couldn't quite bring into my mind the 16 sharpness that I wanted to, to explain it to 17 people properly, at the time.</b> 18 Q. The claims were referred to you on 14 19 May, could it have been after the claims? 20 <b>A. It could have been, yeah.</b> 21 Q. And are you able to say whether you 22 raised it before or after the Chief Minister 23 raised the matter with you on 14 May? 24 <b>A. I can't say with certainty.</b> 25 Q. If we can now go to B1439, please. This</p> <p style="text-align: center;">Page 146</p>	<p>1 also); and (v) the continuing saga of the 2 Alcaidesa claims. I think I will be asking Ian 3 MacGrail to provide more detail and in 4 writing as to what happened here and what 5 they are going to do to engage with these 6 claims before there is any requirement that 7 they do so. I am starting lose confidence 8 here. Best wishes. Fabian". And you 9 respond, we have looked at your response, 10 but you agree. At that time, 14 May, prior to 11 receiving that message did you have any 12 plans to approach the Chief Minister with 13 concerns about Mr McGrail? 14 <b>A. I think I was considering formulating 15 ways where I could more formally raise the 16 level of my concern, yes.</b> 17 Q. Do you think you would have done so, if 18 the Chief Minister had not approached you? 19 <b>A. Yes, absolutely I would.</b> 20 Q. The Chief Minister has given evidence 21 that you were an open door which swung 22 open before his finger touched it. Would you 23 accept that characterisation? 24 <b>A. Yes, I would. Probably not to that degree. 25 I think in one of my emails a bit letter to</b></p> <p style="text-align: center;">Page 148</p>

37 (Pages 145 to 148)

<p>1 <b>Fabian I did say that very little kept me</b>  2 <b>awake but this issue, and that had been for</b>  3 <b>quite a while. It may have been the pressures</b>  4 <b>of the work, and as I said earlier I won't</b>  5 <b>repeat that, but I didn't have that sharp clarity</b>  6 <b>in my mind of how I could or wanted to sort</b>  7 <b>of take matters forward.</b>  8 Q. Why had you not raised these concerns  9 before he approached you, then?  10 <b>A. Sorry, why had I not?</b>  11 Q. Yes.  12 <b>A. Well, I think I had. I think in -- and I</b>  13 <b>think the Chief Minister referenced this</b>  14 <b>yesterday, that in our almost daily</b>  15 <b>engagement over the previous few months,</b>  16 <b>and previously on the issues as they arose,</b>  17 <b>we often would talk about... And I</b>  18 <b>remember being in his office talking about,</b>  19 <b>again, the line that Dr Britto used. So</b>  20 <b>perhaps the language wasn't as strong as it is</b>  21 <b>here -- is here, but certainly, you know, my</b>  22 <b>belief -- firm belief that the RGP needed to</b>  23 <b>modernise was one I'd held for a long time.</b>  24 Q. The message also referred, (v), to "the  25 continuing saga of the Alcaidesa claims."</p> <p style="text-align: center;">Page 149</p>	<p>1 -- especially in one of the newspapers on the  2 <b>Rock, so I would regard that as, if you want</b>  3 <b>to use the word, active.</b>  4 Q. And, then the runway incident. It is fair  5 to say that that was three years prior to this  6 exchange, correct?  7 <b>A. Correct. I think that's such a significant</b>  8 <b>incident, and as I think may have come</b>  9 <b>across L... frequently isn't quite true, but it's</b>  10 <b>not unusual for that incident to come back to</b>  11 <b>my mind.</b>  12 Q. But, you said that you had parked it to  13 one side and moved beyond it?  14 <b>A. It was parked to one side for the</b>  15 <b>interview process, because of the timing. But</b>  16 <b>as my mind was looking to pull together the</b>  17 <b>pieces of this unease I felt, it obviously came</b>  18 <b>back into my mind.</b>  19 Q. And then, as far as the Alcaidesa claims  20 were concerned, those weren't really in the  21 picture at all for you?  22 <b>A. No.</b>  23 Q. You met on the following day; your  24 account is in your statement at paragraph 26,  25 A255. And you say at 26.1, "On 14 May</p> <p style="text-align: center;">Page 151</p>
<p>1 What did you understand that to be referring  2 to?  3 <b>A. So, I only had a vague knowledge of the</b>  4 <b>Alcaidesa claims, which happened way</b>  5 <b>before my time. So, I obviously didn't</b>  6 <b>discount that, because that must have been on</b>  7 <b>the Chief Minister's mind. Whether it, you</b>  8 <b>know, was because of the civil claim being</b>  9 <b>filed it brought the Alcaidesa claims into the</b>  10 <b>Chief Minister's mind. I suspect without the</b>  11 <b>Chief Minister mentioning it it wouldn't have</b>  12 <b>entered my mind, but I didn't attach much</b>  13 <b>weight to it because I wasn't aware of the</b>  14 <b>detail.</b>  15 Q. So from your perspective, although he  16 says, "in terms of the past few months  17 alone", if we go through them: obviously  18 Kram had occurred in March; the HMIC  19 inspection had come to a head from mid to  20 end of April, early May; the Federation  21 bullying allegations, when would you say  22 that that manifested itself?  23 <b>A. So, I first became aware of issues around</b>  24 <b>the Federation I think probably in about</b>  25 <b>2018-19, with a plethora of reports that were</b></p> <p style="text-align: center;">Page 150</p>	<p>1 2020 I received a telephone call from the  2 Chief Minister saying he wished to discuss  3 an important issue surrounding the RGP with  4 me." Is that a reference to a separate  5 telephone call, or is that an erroneous  6 reference to the message that you received on  7 the 14th?  8 <b>A. It could be either. As I say, such was the</b>  9 <b>volume of communication we had on a whole</b>  10 <b>range of issues... I suspect, trying to be a bit</b>  11 <b>sharper now with my memory, it was</b>  12 <b>probably the WhatsApp exchange.</b>  13 Q. Then you say, "My response was that this  14 was a remarkable coincidence as I wanted to  15 discuss my deep concerns about its  16 leadership with him. We agreed to meet the  17 next day." Why did this remarkable  18 coincidence arise, if two months had passed  19 since the incident at sea and a fortnight has  20 passed since you had read the HMIC report?  21 <b>A. I think it was probably notice of the</b>  22 <b>claims. The Met inspection. And as I said,</b>  23 <b>that sort of coming together of the issues.</b>  24 <b>And I think it was beginning to help me</b>  25 <b>sharpen my mind as to what I saw as a way</b></p> <p style="text-align: center;">Page 152</p>

38 (Pages 149 to 152)

1 **forward.**  
 2 Q. It is fair to say, though, that in your  
 3 evidence you do not seem to place much or  
 4 any reliance on the claims as having given  
 5 rise to your loss of confidence?  
 6 **A. No, the claims were a consequence of the**  
 7 **incident at sea, so I tried to separate it's -- it's**  
 8 **more in the public domain, sort of: there's**  
 9 **evidence that this was going to be, and still**  
 10 **is, a serious issue. But I had the claims**  
 11 **linked more to the incident at sea than a self-**  
 12 **standing issue on their own.**  
 13 Q. And, it would have been apparent to you  
 14 right from the outset that there was a  
 15 likelihood of claims?  
 16 **A. Correct.**  
 17 Q. I am trying to recollect your evidence of  
 18 this morning, but did you say that you had  
 19 discussed the potential financial implications  
 20 with Mr McGrail in the immediate aftermath,  
 21 either 8 or 9 March?  
 22 **A. I can't remember the exact line, but I**  
 23 **would have certainly said political-**  
 24 **reputational. Civil-criminal, whether that**  
 25 **brings in claims I don't know, but it would be**

Page 153

1 **wrong of me to state categorically I did.**  
 2 Q. If we can then look at the next three  
 3 paragraphs, you say, "We met on 15 May  
 4 2020, at the very start of which meeting, the  
 5 Chief Minister asked me 'to go first'. I told  
 6 him that I had had for some while concerns  
 7 about the RGP and its leadership which the  
 8 incident at sea has turned into a firm belief  
 9 that change in how the RGP works is needed.  
 10 I briefly ran through my concerns as outlined  
 11 above." "I told him that the incident at sea,  
 12 which had caused the loss of two lives, was  
 13 without doubt going to cause Gibraltar  
 14 reputational and political damage. I said I  
 15 could still not understand how the incident  
 16 had unfolded but what it did do was further  
 17 demonstrate a lack of control by RGP  
 18 leadership. There was a culture at the RGP  
 19 that was unhealthy and it stemmed from its  
 20 leadership. I said I believed I had at best  
 21 been misled by Mr McGrail over issues that  
 22 were the Governor's direct responsibility.  
 23 This was about where the incident had taken  
 24 place. It was a simple question, which I had  
 25 posed to Mr McGrail numerous times during

Page 154

1 the first few days of the incident. It took  
 2 until Wednesday 11th March before he told  
 3 me it was highly likely the incident took  
 4 place outside BGTW." "I told him that I  
 5 thought that Mr McGrail had been evasive on  
 6 this issue. I did not like his flippancy over  
 7 the location 'could be in, could be out', done  
 8 with a shake of the hand nor his answer as to  
 9 why the RGP boat's equipment was turned  
 10 off. 'You know what it is like in the heat of  
 11 the moment'. I said that his behaviours and  
 12 mannerism mirrored those that he had  
 13 displayed during and after the airfield  
 14 incident." Just pausing there, at 26.4 when  
 15 you refer to "You know what it is like in the  
 16 heat of the moment", I think you accepted  
 17 this morning that it is more likely that  
 18 actually what he was referring to then was  
 19 when you had reported to the FCO, which is  
 20 a reference to not notifying the marine base  
 21 of the start of the chase, that it is something  
 22 they may have missed in the heat of the  
 23 moment.  
 24 **A. I think it could be either, or both.**  
 25 Q. The airfield incident, which you referred

Page 155

1 to there, had occurred in 2017, before Mr  
 2 McGrail even became Commissioner. So,  
 3 surely that had not caused your loss of  
 4 confidence directly? I think your evidence is  
 5 that it came back to the fore as a result of the  
 6 more recent experiences?  
 7 **A. Correct.**  
 8 Q. If we look then at 26.5, you say, "I clearly  
 9 remember saying something along the lines  
 10 of 'now I've got that off my chest, what is on  
 11 your mind?' I state that as I was without  
 12 doubt both frustrated and deeply annoyed. I  
 13 was as close to anger as I have been. The  
 14 Chief Minister told me that he shared my  
 15 concerns but that he wanted to brief me on a  
 16 different issue." How was it that you became  
 17 so close to anger, when the incident at sea  
 18 was by this point had happened two months  
 19 previously?  
 20 **A. I think the central point is loss of life, loss**  
 21 **of innocent life, and the manner in which that**  
 22 **happened, which I won't repeat because I've**  
 23 **said that before. The frustration, and deeply**  
 24 **annoyed, together would get me as close to**  
 25 **anger as I have been. I remember very, very**

Page 156

1 clearly that meeting. We also discussed other  
 2 issues: we started off on more softer issues  
 3 around, you know, the future months, the  
 4 arrival of Sir David Steel. And then, when I  
 5 went into my narrative, which is pretty much  
 6 exactly as I remember it obviously, when I  
 7 finished I remember a sigh, and I do  
 8 remember saying: right, I've got that off my  
 9 chest. Which I don't think I've ever said to  
 10 the Chief Minister, or anybody else indeed in  
 11 Gibraltar. So, there was an element of  
 12 outpouring. With outpouring comes emotion,  
 13 and I accept that with emotion, you know,  
 14 often it can get quite close to anger.

15 Q. Then you say at 26.6, "The Chief  
 16 Minister then outlined his belief that Mr  
 17 McGrail had made a serious error of  
 18 judgement with regard to the execution of a  
 19 search warrant against James Levy, gone  
 20 against the advice of the DPP and AG, and  
 21 misled the Chief Minister about that. This  
 22 was in relation to an ongoing criminal  
 23 investigation." In his message the previous  
 24 day the Chief Minister had said, "I will alert  
 25 to a particular matter when we meet", which

Page 157

1 have been that meeting. He did say he'd  
 2 discussed this. Whether it was at a time  
 3 where he again on the back of, you know:  
 4 now I've got that off my chest there's an  
 5 element of the Chief Minister offloading to  
 6 me, and to what degree. I'd be surprised if  
 7 that didn't happen, knowing the relationship I  
 8 had with the Chief Minister, but I can't recall  
 9 exactly the phrases that he would have used.

10 Q. Did he actually spell the lie that he was  
 11 alleging Mr McGrail to have said out to you?

12 A. I think it's inconceivable that he didn't,  
 13 but as I said I can't get into my mind after  
 14 such a long period of time the exact  
 15 sequence, let alone terminology used.

16 Q. Did he mention any other matters that  
 17 had given rise to a loss of confidence on his  
 18 part, or was it only that?

19 A. No, but he -- as I said, he did share my  
 20 concerns over the incidents that I'd referred  
 21 to.

22 Q. Did he tell you then that these matters  
 23 that you refer to at 26.6 were central to his  
 24 loss of confidence?

25 A. Sorry, his... 26.6?

Page 159

1 was a reference to Operation Delhi and his  
 2 meeting with Mr McGrail. What exactly did  
 3 he say to you about that matter?

4 A. I think it was, you know, expanding on  
 5 what I said there: the execution of a search  
 6 warrant against advice. I use the word  
 7 "misled" quite frequently, rather than the  
 8 word "lie", which is the word the Chief  
 9 Minister used. It was -- the detail the Chief  
 10 Minister went into was more than just the  
 11 headline, but I don't think it was the full  
 12 disclosure of everything that was going on  
 13 around Operation Delhi, which I don't think  
 14 the Chief Minister (even if he knew at the  
 15 time) mentioned the word Operation Delhi,  
 16 and I certainly didn't know Operation Delhi  
 17 was called Operation Delhi for quite some  
 18 time.

19 Q. What was his account of -- did he  
 20 mention a meeting on 12 May?

21 A. No, he did not. If he did, then I haven't  
 22 recollected that in my memory.

23 Q. Did he mention a meeting with Mr  
 24 McGrail?

25 A. I think he did, yes. I think he -- so it must

Page 158

1 Q. Yes, did he tell you that those matters  
 2 were central to his loss of confidence, or  
 3 were they the only reason he gave for his loss  
 4 of confidence?

5 A. No, I think it was also accumulative, but  
 6 that -- you know, my tipping point which I  
 7 reported to London was the incident at sea. I  
 8 can't speak for the Chief Minister, but I  
 9 would be surprised if he wasn't in the same  
 10 position, with the tipping point being how he  
 11 was misled by Mr McGrail.

12 Q. There are three things that you mention  
 13 there, there are three points. First, "that Mr  
 14 McGrail had made a serious error of  
 15 judgement with regard to the execution of a  
 16 search warrant"; that Mr McGrail had "gone  
 17 against the advice of the DPP and AG"; and  
 18 that Mr McGrail had "misled the Chief  
 19 Minister about that." Which, if any, of those  
 20 three did he place more emphasis on?

21 A. I think they're a collective. I think you  
 22 can put them together into one issue, which is  
 23 a serious error of judgement on the issue  
 24 of... So, you know, what started the error of  
 25 judgment was the execution of a search

Page 160



<p>1 <b>warrant, but actually what preceded that was</b>  2 <b>going against the advice. So, I think you can,</b>  3 <b>you know, I can make an argument for</b>  4 <b>reading than any way, but I would say that</b>  5 <b>it's the collective weight of those three</b>  6 <b>together that are quite -- make it quite</b>  7 <b>significant.</b>  8 Q. Did the Chief Minister explain to you his  9 own connection with the background to that  10 investigation?  11 <b>A. So, of course I knew about the Chief</b>  12 <b>Minister's connection to Hassans and James</b>  13 <b>Levy. I don't think -- I didn't know, really,</b>  14 <b>much about sort of the intricate details of the</b>  15 <b>transfer of ownership and companies being</b>  16 <b>set up at that time.</b>  17 Q. So, he did not tell you that he had an  18 indirect beneficial interest in the company, 36  19 North, that was seeking to take over the  20 contract?  21 <b>A. I don't believe he did.</b>  22 Q. Did he tell you that he had been in  23 communication with the directors of 36  24 North, prior to their departure from Bland?  25 <b>A. I don't remember that he did.</b></p> <p style="text-align: center;">Page 161</p>	<p>1 participate in the section 34 considerations?  2 <b>A. No, I don't. I pause there, because I do</b>  3 <b>remember reflecting over the next few days</b>  4 <b>quite often on the totality of this issue and all</b>  5 <b>elements of it. And I'm sure you're going to,</b>  6 <b>or somebody will ask me about that later, but</b>  7 <b>again it goes back to the faith and trust I have</b>  8 <b>and had in the Chief Minister, is that when a</b>  9 <b>Chief Minister has a conversation with the</b>  10 <b>Governor in which he alleges that the</b>  11 <b>Commissioner of Police lied to him I</b>  12 <b>wouldn't doubt his word on that.</b>  13 Q. You refer to the faith that you had and  14 have in the Chief Minister. Knowing  15 everything you do now about that  16 investigation, and about his links to 36 North  17 and to Mr Levy and Hassans, do you  18 consider that he was in a sufficiently  19 independent position to be involved in the  20 process?  21 <b>A. I suspect that he considered that very</b>  22 <b>carefully himself, and would do nothing that</b>  23 <b>put his position and reputation at risk. So I</b>  24 <b>assume that he fully considered that himself,</b>  25 <b>and again, as I said back on... you know, I</b></p> <p style="text-align: center;">Page 163</p>
<p>1 Q. Did it occur to you that there was a  2 danger, or at least a perception, that the Chief  3 Minister might have his own financial  4 interest in the RGP not taking executive  5 action against Mr Levy and Hassans?  6 <b>A. With the high regard in which I regard the</b>  7 <b>Chief Minister, that would never have</b>  8 <b>entered my mind. I know that his</b>  9 <b>arrangement was Hassans was, whether it's --</b>  10 <b>the expression is sleeping partner, I believe</b>  11 <b>it's sabbatical. I knew about that, therefore I</b>  12 <b>knew as a partner he would get some sort of</b>  13 <b>remuneration from the business that Hassans</b>  14 <b>did, so for me that wasn't much of an issue.</b>  15 Q. But you would accept that if executive  16 action or even a charge were brought against  17 the senior partner of Hassans, that might  18 almost inevitably lead to a loss of income for  19 the Chief Minister?  20 <b>A. I -- that never crossed my mind. I never</b>  21 <b>thought of it in that way.</b>  22 Q. Did any of the Chief Minister's links to  23 Mr Levy and Hassans make you stop to think  24 whether the Chief Minister was in a  25 sufficiently independent position to</p> <p style="text-align: center;">Page 162</p>	<p>1 <b>have no reason to doubt the Chief Minister's</b>  2 <b>actions nor motives.</b>  3 Q. So, you do not think that he should have  4 recused himself from that process, given the  5 circumstances as we now know them?  6 <b>A. The process of?</b>  7 Q. Of discussing whether to approach Dr  8 Britto.  9 <b>A. No. He's the Chief Minister of Gibraltar</b>  10 <b>and he -- you know, the lack of confidence</b>  11 <b>was from both of us, for ultimately different</b>  12 <b>reasons. One could say, although I wouldn't</b>  13 <b>want this to be taken in any flippant way, that</b>  14 <b>the coincidence of timing of these matters of</b>  15 <b>importance to both of us coming together at</b>  16 <b>the same time, you know, may be</b>  17 <b>coincidental, but that's all they were: there</b>  18 <b>was no conspiracy or collusion in that.</b>  19 Q. I think that it as been suggested that the  20 Chief Minister may have manipulated you  21 into arriving at the decision that you took.  22 What is your reaction to that.  23 <b>A. Well, I assume everybody has done their</b>  24 <b>research on my background and my career. I</b>  25 <b>find it quite insulting, to a degree, that people</b></p> <p style="text-align: center;">Page 164</p>

41 (Pages 161 to 164)

<p>1 <b>could suggest, with what I've done in my</b>  2 <b>career and what I've achieved, and in some of</b>  3 <b>the deeply challenging and complex issues</b>  4 <b>I've been involved with (and I have to say</b>  5 <b>this carefully: my work on Somalia springs to</b>  6 <b>mind), that I could be manipulated and</b>  7 <b>manoeuvred is quite insulting.</b>  8 Q. During the course of this meeting, who  9 would you say had stronger feelings about  10 the matter you were discussing? Or was it an  11 equality as far as that was concerned?  12 <b>A. It was probably the first time that I was</b>  13 <b>more angry than the Chief Minister, and I</b>  14 <b>have had a couple of meetings with the Chief</b>  15 <b>Minister where he was quite angry, including</b>  16 <b>with me or with FCO, HMG. But I was -- I</b>  17 <b>was quite -- I was upset and angry, and I</b>  18 <b>don't know whether there's a word that</b>  19 <b>combines upset and angry. And I remember,</b>  20 <b>as I said, the sigh of relief when I went back</b>  21 <b>on the sofa and said: right, I've got that off</b>  22 <b>my chest. It was quite cathartic in some way,</b>  23 <b>and from that moment I was beginning to get</b>  24 <b>the clarity I'd wanted on what I thought (and</b>  25 <b>that's just what I thought, because it was for</b></p> <p style="text-align: center;">Page 165</p>	<p>1 (14.30)  2 <b>A. I think it confirmed where I was heading.</b>  3 <b>It may have speeded it up. I do remember</b>  4 <b>before I went over to see the Chief Minister</b>  5 <b>having, although I could have a sense from</b>  6 <b>his WhatsApp, what would I do if he</b>  7 <b>disagreed with me, if he said, "No, we cannot</b>  8 <b>have this, it would, you know, reflect badly.</b>  9 <b>We need to manage it and, you know, we</b>  10 <b>will get the GPA to do that." Um, I did have</b>  11 <b>that thought. I did wonder as I was walking</b>  12 <b>into the meeting or preparing myself for it as</b>  13 <b>to what I would say, how firm I was going to</b>  14 <b>be in my view that, um, the change in the</b>  15 <b>leadership of the RGP was perhaps the best</b>  16 <b>way to bring about the change of the RGP.</b>  17 Q. Do you think your decision making was  18 influenced by your concerns about  19 Mr McGrail prior to his time as  20 Commissioner of Police in relation to the  21 airport incident?  22 <b>A. It would be wrong to say that it wasn't</b>  23 <b>a factor, but it was a minor factor that came</b>  24 <b>at the end. And as I have said previously,</b>  25 <b>and apologies for repeating myself, without</b></p> <p style="text-align: center;">Page 167</p>
<p>1 <b>the GPA to take forward) what next steps</b>  2 <b>should be.</b>  3 Q. If we now look at B1440, please. These  4 are the WhatsApp exchanges between you  5 and the Chief Minister. And I just want to  6 focus on the one at three minutes past eight.  7 You say, "Good as always to catch up. I don't  8 see any option re CoP given the evidence. I'll  9 speak to Joey carefully sometime next week.  10 Quite bizarrely, the Federation could end up  11 'defending' Ian! Have a good  12 weekend. Nick". When you say, "I don't see  13 any option re CoP given the evidence", was  14 that consistent with Mr McGrail being given  15 the opportunity to make representations?  16 <b>A. Absolutely, yeah. I mean, the "option re"</b>  17 <b>was following the process as set out, which,</b>  18 <b>you know, we -- we're going to make our</b>  19 <b>views known to the GPA. And then it was</b>  20 <b>the G-- for the GPA to take the process</b>  21 <b>forward.</b>  22 Q. Did you reach the view that there was no  23 option independently, or do you consider that  24 you were influenced by the strength of the  25 Chief Minister's feelings as well?</p> <p style="text-align: center;">Page 166</p>	<p>1 <b>the incident at sea I would not have lost</b>  2 <b>confidence. It wouldn't mean that I did not</b>  3 <b>have concerns, but there is a big difference</b>  4 <b>and a big step between concerns and loss of</b>  5 <b>confidence.</b>  6 Q. You just referred to your thoughts prior  7 to the meeting. Just to focus on that for  8 a second, were you considering raising the  9 prospect of a section 34 process at the  10 meeting or did you have something else in  11 mind?  12 <b>A. No. I think there's only one way forward,</b>  13 <b>in my opinion. I may have that wrong, um,</b>  14 <b>I'm not saying I got every decision right, but</b>  15 <b>that's the only ... I thought this was</b>  16 <b>something that the GPA would eventually</b>  17 <b>and quite quickly have to pick up on.</b>  18 Q. If we can go to C4359, please. This is  19 an email from you to the FCDO on 22  20 May 2020. You say "very interesting" in  21 response to the person you were  22 corresponding with saying "interesting  23 times". You say:  24 "Very interesting. It is the James Levy angle  25 as well that is interesting. I am also a touch</p> <p style="text-align: center;">Page 168</p>

42 (Pages 165 to 168)

1 nervous given that the CM has firmly taken  
 2 the lead on a competence that is more  
 3 towards us than them. But we have agreed  
 4 this approach which on balance is right. It  
 5 also raises issues about the GPA who should  
 6 have been monitoring the COP but I cannot  
 7 see it ending well for anyone."  
 8 How had the Chief Minister firmly taken the  
 9 lead on a competence that is more towards  
 10 you than the government?  
 11 **A. Um, I think it's with the subsequent**  
 12 **engagement with Dr Britto on sort of giving**  
 13 **advice on the letters that the GPA were going**  
 14 **to pass to Mr McGrail. (Pause). Having said**  
 15 **that, the Chief Minister did clear or share the**  
 16 **drafts with me and, as I stated, we did agree**  
 17 **this approach and I do believe that that is**  
 18 **a discussion, one of the discussions, I had**  
 19 **with London on just checking with**  
 20 **headquarters, for want of a better word, that**  
 21 **this was okay.**  
 22 Q. Why were you a touch nervous?  
 23 **A. Um, because I could see by the letter of**  
 24 **the Act and the Constitution that it was**  
 25 **possibly, you know, crossing a line. But it**

Page 169

1 goes back to the working relationship the  
 2 chief ministers had, not just with me but  
 3 current and previous governors, and that it is  
 4 a partnership and we work closely together.  
 5 **There is no, I think somebody has referred to**  
 6 **me twice in this way, there is no colonial**  
 7 **element about how I ever operated anywhere**  
 8 **in my career. And I was quite content for the**  
 9 **Chief Minister to take the lead, which is why**  
 10 **I said: "We have agreed this approach which**  
 11 **on balance is right." And that message and**  
 12 **that discussion would have given London the**  
 13 **opportunity to say, "Actually, Nick, I think**  
 14 **you have got that wrong, you have to get the**  
 15 **lead back." And I think we have got to be,**  
 16 **you know, careful on the word "lead". So,**  
 17 **you know, I suspect if I was asked to put**  
 18 **percentages on it, the split of roles,**  
 19 **responsibility and leadership was nothing**  
 20 **more than 55/45 and on some occasions it**  
 21 **may have been 55 in my occasion. I suspect,**  
 22 **I would like to think, it was more often than**  
 23 **not 50/50.**  
 24 Q. You say that he was taking the lead given  
 25 his liaising with Dr Britto and the

Page 170

1 amendments that were being made to the  
 2 letters. That was the same day as this email.  
 3 Did you know at the time that the editing was  
 4 taking place by the Chief Minister?  
 5 **A. Um, I would be surprised if I didn't. I**  
 6 **knew that Dr Britto wanted help or guidance.**  
 7 **So again it's an assumption I am making that**  
 8 **I must have. Because we agreed to this**  
 9 **approach, meaning we did it before the**  
 10 **approach took into effect.**  
 11 Q. Did you raise with the Chief Minister that  
 12 you felt nervous about him taking the lead in  
 13 this way?  
 14 **A. I would be surprised if I didn't. That's the**  
 15 **relationship we had.**  
 16 Q. Did you at any point make clear to him  
 17 that it was you and not him who had primary  
 18 constitutional oversight over this matter?  
 19 **A. I mean, the Chief Minister doesn't need**  
 20 **me to tell him that. He knows that and I**  
 21 **think from our first discussion we were very**  
 22 **clear, which is why I made the point to**  
 23 **Dr Britto, that if the GPA were in default**  
 24 **then the process fell only to the Governor.**  
 25 **So I think that is a given that we had had that**

Page 171

1 **discussion. And the Chief Minister doesn't**  
 2 **need me or anybody else to tell him that.**  
 3 Q. If we can go to B1441, please. This is the  
 4 morning after your meeting of the 15th and  
 5 the Chief Minister messages you at 11.47  
 6 saying:  
 7 "My pillow always gives me the best advice.  
 8 If we are going to do this do we very  
 9 discreetly at your end line someone up? We  
 10 cannot have it headless."  
 11 And you respond:  
 12 "Thinking about it quite a lot. Need to  
 13 discreetly bring Joey Britto into our thinking.  
 14 I am happy to do that Monday."  
 15 He replies:  
 16 "Yes, agreed. Shall we do so early?  
 17 Morning coffee with the three of us in my or  
 18 yours. Let's do mine."  
 19 Was lining up a replacement ... sorry, just to  
 20 finish that, can we go to C3911. And this is  
 21 you to a contact of yours:  
 22 "Thanks, I will email and we can perhaps  
 23 have a chat basically and on a cumulative  
 24 basis both the Chief Minister and I have lost  
 25 faith in the Commissioner of Police. All

Page 172

<p>1 highly sensitive and only the AG knows. 2 One question is how best to quickly recruit 3 a replacement. CM agrees that we should 4 look outside Gibraltar." 5 Do you think that lining up a replacement on 6 16 May was consistent with a process where 7 Mr McGrail was given the opportunity to 8 make representations? 9 <b>A. I do. I think it would be remiss not to 10 make such a contingency. This was the start 11 in a process of looking to have somebody 12 that could come in, and you can question me 13 on the options that we put forward and the 14 advice I got from our ... the contact is 15 actually a senior person. He is the overseas 16 territory police adviser who is based in 17 Miami. So no, I think that was absolutely the 18 right thing to do. It was not prejudging what 19 the GPA were going to do. It was 20 a contingency should they put into effect 21 what the Chief Minister and I were hoping 22 would have happened.</b> 23 Q. Would it be fair to say that by this stage 24 you and the Chief Minister had decided that 25 there was no prospect of Mr McGrail</p> <p style="text-align: center;">Page 173</p>	<p>1 Q. C3937, please. Did you raise that 2 contingency with Dr Britto? 3 <b>A. I can't remember that I did, which is 4 an interesting question. And again it does 5 not mean it didn't happen, but I don't believe 6 Dr Britto referred to it in his memory of the 7 record neither did I myself. It could be that 8 we decided or I decided to do a bit more 9 preliminary work first with the overseas 10 police adviser before raising it with 11 Dr Britto.</b> 12 Q. Then at C3937, that we have on the 13 screen, you email Dr Britto: 14 "Joey, can you make a meeting at the 15 Convent with the CM and I on Monday at 16 9.30? Nick confirmed, regards." 17 Why did you not reveal in that email the 18 topic of the meeting? 19 <b>A. I don't know. I don't know.</b> 20 Q. Would it not have been helpful to have 21 given Dr Britto some details in advance? 22 <b>A. Yes, with hindsight it probably would 23 have.</b> 24 Q. For example, by suggesting that he 25 familiarise himself with section 34 of the</p> <p style="text-align: center;">Page 175</p>
<p>1 continuing in his role at this stage? 2 <b>A. No. No, the opposite and actually in the 3 email I said I was conflicted and I was being 4 kept awake at night. One of the things that 5 was keeping me awake was what happens if 6 the GPA say no. If the GPA say, "Actually 7 we have heard Mr McGrail's representations 8 and we think you have been so unfair we 9 want to have a discussion as to an alternative 10 way forward."</b> 11 Q. Just going back to exchange, B1441, you 12 say: "Need to discreetly bring Joey Britto 13 into our thinking." What did you mean by 14 that? 15 <b>A. The thinking of lining up or having 16 contingency for somebody to come in and 17 help with the transitional period of 18 Commissioner of Police.</b> 19 Q. So that was not in your view a reference 20 to the removal of Mr McGrail. 21 <b>A. No. No, because we weren't going to do 22 that discreetly. We were going to do that 23 properly and correctly. The word "discreet" 24 does not come into that element of our 25 thinking.</b></p> <p style="text-align: center;">Page 174</p>	<p>1 Police Act. 2 <b>A. Well, I sort of assumed that the Chairman 3 of the GPA would know without needing to 4 refresh his mind on how the Police Act 5 worked in reference to the GPA.</b> 6 Q. The day -- 7 <b>A. But I take the point. I don't mean to ... 8 um.</b> 9 Q. If we can about to 3947, please, this is 17 10 May 2020 at 6.37, the day before your 11 meeting with Dr Britto. You and the Chief 12 Minister exchange emails with your 13 preliminary views as to the basis for 14 approaching and suggesting that the GPA 15 commence the process. Were you aware that 16 the Chief Minister had met Mr Levy and 17 Mr Baglietto at his home that day? 18 <b>A. No, but I don't know why I should know 19 that.</b> 20 Q. The main reason given by the Chief 21 Minister for his loss of confidence related to 22 the search warrants and the lie that he said he 23 had been told, the search warrants relating to 24 Mr Levy. But he did not inform you that he 25 had met Mr Levy that day.</p> <p style="text-align: center;">Page 176</p>

44 (Pages 173 to 176)

<p>1 <b>A. I don't, I still, with respect, don't see why</b>  2 <b>that would ... the meeting I had with the</b>  3 <b>Chief Minister where he told me of</b>  4 <b>Mr McGrail going against the advice of the</b>  5 <b>Attorney General and the DPP and having</b>  6 <b>misled the Chief Minister was, you know,</b>  7 <b>something I took without needing to know all</b>  8 <b>the intricate details of meetings, WhatsApps,</b>  9 <b>exchanges and implications around that.</b>  10 Q. If we can look at the third paragraph of  11 that email, you say:  12 "So as I see it and to my untrained eye it is  13 for the GPA to take this forward in the first  14 instance. I agree with you that it is important  15 we follow the process to the letter, not look  16 to prejudge and allow the Commissioner to  17 put forward a defence, etc. The last thing we  18 want to do is face a charge of constructive  19 dismissal. I suggest we therefore say to Joey  20 tomorrow that we have lost confidence in the  21 Commissioner, set out why and task him to  22 consider options as to the way forwards."  23 Do you consider that you carried out the  24 process in the way that you set out to do in  25 that paragraph?</p> <p style="text-align: center;">Page 177</p>	<p>1 as a result, we had both lost confidence in the  2 Commissioner and were therefore requesting  3 the GPA to consider using the powers  4 available to them under Section 34 of the  5 Police Act (2006) to call upon the  6 Commissioner to retire."  7 How much detail did the Chief Minister give  8 to Dr Britto about the ongoing investigation?  9 <b>A. I think it was, um, headline fashion, not</b>  10 <b>just bullet point. So a bit of detail but</b>  11 <b>without the full detail, but I can't recall the</b>  12 <b>exact sequence and terminology used.</b>  13 Q. Did he point out to Dr Britto his own  14 financial interests in 36 North or in Hassans?  15 <b>A. I don't believe he did.</b>  16 Q. Did he mention his communications with  17 two of the individuals who were under  18 arrest?  19 <b>A. No, not to my knowledge.</b>  20 Q. Dr Britto's evidence is that you did most  21 of the talking at this meeting. Do you agree?  22 <b>A. Um, not quite. I think it was in that</b>  23 <b>balance of 50/50, 45/65. Um, it was a sort of</b>  24 <b>a correct, proper meeting. It was not one</b>  25 <b>with interjections and it was ... and the Chief</b></p> <p style="text-align: center;">Page 179</p>
<p>1 <b>A. Yes, I do.</b>  2 Q. Were you looking to the Chief Minister  3 for guidance on how the section 34 process  4 would work?  5 <b>A. No.</b>  6 Q. Did you consider getting legal advice on  7 the sequencing of section 34 at this stage,  8 either from the Attorney General or from the  9 FCDO legal department?  10 <b>A. I didn't. Section 34 was very clear and</b>  11 <b>even to my untrained legal eye I should have</b>  12 <b>perhaps inserted I know how section 34</b>  13 <b>worked. Or should work.</b>  14 Q. On 18 May 2020 at 9.30 you met  15 Dr Britto and the Chief Minister at the  16 Convent. Your account is set out in  17 paragraph 14.1 of your first statement, A240.  18 And you say as follows at 14.1:  19 "At my request, the Chief Minister set out the  20 issues of concern to both of us namely the  21 damning HMIC report, the incident at sea  22 involving a fatal collision, the Police  23 Federation allegations of bullying, and the  24 mishandling of a high-profile ongoing  25 investigation. The Chief Minister stated that</p> <p style="text-align: center;">Page 178</p>	<p>1 <b>Minister and I decided that approach and I</b>  2 <b>think, if my memory serves me correctly, the</b>  3 <b>reason why the Chief Minister set out the</b>  4 <b>issues is for then me to follow up and put the</b>  5 <b>GPA on notice the scrutiny they would be</b>  6 <b>under and that I would be prepared to use my</b>  7 <b>powers should they be in default.</b>  8 Q. Can we go to C4234, please. This is your  9 email to the FCDO on 21 May 2020 at 5.57  10 where you are reporting on the meeting that  11 took place in the Convent. And you say:  12 "At my request the CM set out the issues of  13 concern, namely the damning HMIC report,  14 the fatal collision, Police Federation  15 allegations of bullying and the mishandling  16 of a high-profile ongoing investigation in  17 which the Commissioner apparently went  18 against the advice of the Attorney General  19 and Director of Public Prosecutions."  20 Did the Chief Minister actually say that  21 Mr McGrail went against advice or did he  22 state that Mr McGrail had not sought advice?  23 <b>A. My memory is that he went against the</b>  24 <b>advice.</b>  25 Q. You did not reveal in this email at that</p> <p style="text-align: center;">Page 180</p>

45 (Pages 177 to 180)

<p>1 stage that the person under investigation was                  2 Mr Levy of Hassans. But you revealed this                  3 the next day, if we can go to B1780. At 3.21,                  4 the fifth bullet point says:                  5 "The Commissioner believes this is in part                  6 driven by the ongoing investigation. The                  7 high-profile person referred to below is                  8 James Levy."                  9 Why did you not reveal that information                  10 initially?                  11 <b>A. I don't know. I think I mentioned it</b>                  12 <b>before, or it has been referenced before here.</b>                  13 Q. In an exchange with, I think it was, well,                  14 with someone, I do not know, it is redacted,                  15 but it looked like it was not with the same                  16 group.                  17 <b>A. I think it may have been, but I stand to be</b>                  18 <b>corrected because the collective distribution</b>                  19 <b>lists that I tend to use are broad. But, um, I</b>                  20 <b>don't know why I didn't say that from the</b>                  21 <b>outset. I think it was more to, um, to set out</b>                  22 <b>that of course everybody knows that the</b>                  23 <b>Chief Minister is connected to Hassans.</b>                  24 <b>Everybody known the high regard with</b>                  25 <b>which the Chief Minister holds James Levy,</b></p> <p style="text-align: center;">Page 181</p>	<p>1 call to retire was not appropriate, I would                  2 consider using the powers available to me                  3 under Section 13.(l)(f) which allowed me to                  4 call for the resignation of the Commissioner                  5 and that, as things stood, I would need strong                  6 and persuasive arguments not to do so. I said                  7 whilst I was not looking to pre-judge the                  8 deliberations of the GPA and was mindful                  9 that the Commissioner is allowed to make                  10 representations as Section 34 allows, the                  11 GPA should be in no doubt as to the strength                  12 of my feelings. I concluded by saying the                  13 powers I have under Section 13(1)(f) only                  14 come into play 'in default by the Authority'.                  15 Why was it necessary or appropriate for you                  16 to refer to section 13 at this early stage of the                  17 process?                  18 <b>A. I think it was to put Dr Britto and the</b>                  19 <b>GPA on notice that the process had to be</b>                  20 <b>followed, um, correctly and properly. Not</b>                  21 <b>for one moment, which I think I may</b>                  22 <b>reference in some of my evidence, did I ever</b>                  23 <b>expect to have to consider using the powers</b>                  24 <b>under section 13(1)(f) because they can only</b>                  25 <b>come into play in default by the Authority.</b></p> <p style="text-align: center;">Page 183</p>
<p>1 <b>as I do. So it was just making that</b>                  2 <b>connection. Um, I wouldn't like to suggest it</b>                  3 <b>was for any other reason.</b>                  4 Q. Why the exclamation mark then?                  5 <b>A. Um, just because it is James Levy, head</b>                  6 <b>of Hassans, very senior lawyer, head of the</b>                  7 <b>Jewish community, you know, etc, etc, in</b>                  8 <b>Gibraltar. And it may be that, you know,</b>                  9 <b>they are actually investigating James Levy so</b>                  10 <b>it could have been linking the first part of</b>                  11 <b>that bullet point to James Levy. I think if it</b>                  12 <b>had been anybody else I might have put the</b>                  13 <b>name but without the exclamation mark.</b>                  14 Q. If we can go back to your evidence, 14.2,                  15 you say, this is back to the meeting with                  16 Dr Britto:                  17 "I endorsed the Chief Minister's position and                  18 said that there had to be accountability for                  19 the failings. I said the common thread                  20 through all the issues appeared to be a lack of                  21 adequate management and leadership and                  22 that therefore in my opinion, it is the                  23 Commissioner who has to be held                  24 accountable.                  25 "I said that should the GPA determine that a</p> <p style="text-align: center;">Page 182</p>	<p>1 <b>And I think what I possibly would have said,</b>                  2 <b>again on a language issue, is "I concluded by</b>                  3 <b>saying", I should have perhaps said "I</b>                  4 <b>concluded by stressing", because that's what I</b>                  5 <b>did.</b>                  6 Q. You said that you would need:                  7 "Strong persuasive reasons not to use section                  8 13 and said that the GPA should be in no                  9 doubt as to the strength of my feelings."                  10 Do you accept that the effect of this was to                  11 make Dr Britto think you were very likely to                  12 use your powers?                  13 <b>A. He would have been right. I was very</b>                  14 <b>likely to have used my powers and it goes</b>                  15 <b>back to my comment earlier, that if the GPA</b>                  16 <b>were to be in default, what was I to do?</b>                  17 <b>Suddenly say, "That's okay, that is fine, let's</b>                  18 <b>crack on as usual." Or look to sort of put into</b>                  19 <b>effect an outcome that the Chief Minister and</b>                  20 <b>I wanted because I couldn't suddenly re-lose</b>                  21 <b>my loss of confidence and allow us to go</b>                  22 <b>back, you know, however long to start</b>                  23 <b>a process again.</b>                  24 Q. Not even if you saw persuasive                  25 representations?</p> <p style="text-align: center;">Page 184</p>

<p>1 <b>A. No. I mean, that is a fair point, and yes,</b>  2 <b>and, you know, my mind was not closed. I</b>  3 <b>hadn't fully, I was conscious of the role and</b>  4 <b>the responsibility, hence this keeping me</b>  5 <b>awake at night. Um, so that was, yes, I think</b>  6 <b>it is fair and true to say that I was challenged</b>  7 <b>by all of this.</b>  8 Q. Dr Britto's evidence was that he  9 interpreted this as you saying that he would  10 not be doing his duty if he did not invite  11 Mr McGrail to retire. Do you think that was  12 the effect of what you had told him?  13 <b>A. It wasn't the effect that was intended. I</b>  14 <b>can't really speak for how Dr Britto took</b>  15 <b>what I was saying. And I can only apologise</b>  16 <b>to Dr Britto if I didn't make it clear enough.</b>  17 <b>What I was stressing was that, and I think I</b>  18 <b>put this in my email to London, is that the</b>  19 <b>GPA will come under intense scrutiny and</b>  20 <b>therefore had to get it right in terms of the</b>  21 <b>process. So it is the process that the</b>  22 <b>important thing here, not the outcome of their</b>  23 <b>deliberations because I had played a scenario</b>  24 <b>in my mind that they might well indeed come</b>  25 <b>back and say, I think in one of my emails,</b></p> <p style="text-align: center;">Page 185</p>	<p>1 <b>clear and the Chief Minister had made his</b>  2 <b>position clear, um, I simply thought that's the</b>  3 <b>end of my role in this. Certainly I was</b>  4 <b>hoping that was the end of my role in this.</b>  5 <b>The expectation/hope I had was that the GPA</b>  6 <b>would follow a thorough section 34 process.</b>  7 <b>I can't pre-empt or prejudge or, you know,</b>  8 <b>second-guess the GPA, neither would I try to</b>  9 <b>do so. And yes, there was the possibility that</b>  10 <b>they would have not agreed with the Chief</b>  11 <b>Minister and I or come back and say, as I</b>  12 <b>have said before, "We have listened to</b>  13 <b>Mr McGrail and we think he has some valid</b>  14 <b>points, they need exploring, we need to slow</b>  15 <b>the process down, we need to take it in</b>  16 <b>slower time and consider things." That was</b>  17 <b>certainly one of the scenarios I played in my</b>  18 <b>mind.</b>  19 Q. Were you not --  20 <b>A. It was a possibility.</b>  21 Q. Sorry to cut across.  22 <b>A. No.</b>  23 Q. Were you not in effect saying to them: if  24 you do not agree with us I am going to hold  25 you in default?</p> <p style="text-align: center;">Page 187</p>
<p>1 <b>"This is quite close to constructive dismissal,</b>  2 <b>so we want a further discussion with the</b>  3 <b>Chief Minister, etc, etc, etc."</b>  4 Q. Did you raise section 13 deliberately to  5 get Dr Britto to agree to the section 34  6 process?  7 <b>A. Um, no. I think we used the word</b>  8 <b>"consider". You have to consider using. I</b>  9 <b>don't think we said he must and you have to.</b>  10 <b>I mean, there is a consequence of the Chief</b>  11 <b>Minister and the Governor losing ...</b>  12 <b>expressing to the Chairman of the GPA that</b>  13 <b>they have both lost confidence in the</b>  14 <b>Commissioner of Police. I think, you know,</b>  15 <b>it may be leading but I think there's only one</b>  16 <b>outcome from that, which is a section 34</b>  17 <b>process.</b>  18 Q. Dr Britto's evidence is that he thought  19 Mr McGrail deserved the dignity of leading  20 the RGP in his own terms by retirement  21 rather than face being asked to resign under  22 section 13. Did you in any way encourage  23 Dr Britto to exercise his section 34 power for  24 that reason?  25 <b>A. No. I think once I had made my position</b></p> <p style="text-align: center;">Page 186</p>	<p>1 <b>A. I can't hold them in default. Only they</b>  2 <b>can be in default.</b>  3 Q. Yes. You did stress that your powers  4 only came into play in default by the  5 Authority.  6 <b>A. Correct.</b>  7 Q. So you were saying to them: if you do not  8 agree with us --  9 <b>A. No, no, no.</b>  10 Q. -- I will deem you to be in default.  11 <b>A. No, I can't deem them to be in default.</b>  12 <b>They have to be in default. I can't ... it's not</b>  13 <b>for me to decide whether the GPA are in</b>  14 <b>default.</b>  15 Q. Let me take that word away completely  16 then. Were you saying to them: if you do not  17 agree with us you will be in default?  18 <b>A. No, because that's not the case. And I'm,</b>  19 <b>unless I am going into areas beyond my</b>  20 <b>competence, I thought only the GPA can be</b>  21 <b>in default. I can't say they are in default and</b>  22 <b>they not be in default when they are not in</b>  23 <b>default.</b>  24 Q. Would you accept that the presence of the  25 GPA and the section 34 process and the</p> <p style="text-align: center;">Page 188</p>

47 (Pages 185 to 188)

<p>1 independence of the GPA is there to avoid 2 the Chief Minister and the Governor simply 3 coming to the decision themselves? 4 <b>A. Um, no, I don't think that is the case. I 5 think the Governor and Chief Minister have 6 the ability and the right to be able to reach 7 a conclusion which they then explain to the 8 Chair of the GPA, um, and then it's up to the 9 GPA to decide how to take that forward. The 10 only option, as I said, and again I apologise 11 for repeating myself, is that with the Chief 12 Minister and the Governor expressing their 13 loss of confidence, surely the only approach 14 or way forward is through section 34. That is 15 not a question to you, that is more of 16 a statement from me. I am not --</b> 17 Q. Yes, I didn't interpret it as such. Thank 18 you. Did this meeting effectively present 19 Dr Britto with a fait accompli? 20 <b>A. No, I don't think so at all. And again that 21 wasn't the intent.</b> 22 Q. If it is not up to you to hold or deem the 23 GPA is in default, then how would you know 24 when your section 13(1)(f) power it 25 activated?</p> <p style="text-align: center;">Page 189</p>	<p>1 about that on 3991 and it is beside the letter 2 C: 3 "The Chief Minister also shared another 4 event occurring last week which had left him 5 also in a situation where the Commissioner 6 had expressly misled him and which left him 7 unable to believe the Commissioner." Do 8 you consider --- was it referred to more 9 expressly than that at the meeting with Dr 10 Britto or was that how it was expressed at the 11 meeting? 12 (15.00) 13 <b>A. I think that's how it was expressed at the 14 meeting.</b> 15 Q. Do you think that that fairly summarised 16 the reasons for the Chief Minister losing 17 confidence in Mr McGrail with such little 18 information being given in respect of that 19 matter? 20 <b>A. I think the record of the meeting is 21 shorter than the meeting itself and I find it 22 inconceivable that the Chief Minister, as I 23 said, whilst it was headline, it was more than 24 a bullet point and it was a bit deeper than that 25 but in terms of a record of a meeting, which</b></p> <p style="text-align: center;">Page 191</p>
<p>1 <b>A. That's another scenario I played through 2 my mind. I couldn't see how, which is why I 3 was relieved once we had handed the process 4 over and the GPA, you know, Dr Britto had 5 agreed that 34 was the way forward, as I said 6 earlier, I thought that was ... because I 7 thought how on earth could the GPA come 8 into default?</b> 9 Q. But you ultimately did arrive at the 10 decision that it had. 11 <b>A. Um, it wasn't my decision. It happened.</b> 12 Q. Can we go to 3988, please, C3988. This 13 is the note that the Chief Minister prepared of 14 the meeting, which you state in your 15 evidence he cleared with you. Do you 16 consider that that note accurately set out what 17 was discussed? 18 <b>A. Do you mind if I read it again?</b> 19 Q. Of course, yes. (Pause). You may have 20 a hard copy if you -- 21 <b>A. Yes, I know that record. Yes. Yes, it is 22 accurate.</b> 23 Q. In terms of Operation Delhi and the lie 24 that Mr McGrail is alleged to have told about 25 the DPP's advice we can find what is said</p> <p style="text-align: center;">Page 190</p>	<p>1 <b>is the same as, with respect, GPA records of 2 their meetings, this is accurate but possibly 3 not to the depth of the issue as it was 4 discussed.</b> 5 Q. Do you agree that Dr Britto deserved to 6 have the best possible information so that he 7 could communicate it to the GPA? 8 <b>A. Yes.</b> 9 Q. Do you think that those four lines were 10 sufficient for the GPA, the members of the 11 GPA to make an informed decision as to that 12 matter, that the key issue that had caused the 13 Chief Minister to lose confidence? 14 <b>A. No, no, it isn't but, as I am absolutely 15 certain, the GPA would have asked for more 16 information.</b> 17 Q. Knowing what you do now, do you 18 consider that the Chief Minister should have 19 raised this matter in the meeting in more 20 detail to give Dr Britto a full picture of 21 events? 22 <b>A. I think with hindsight the first meeting 23 should either have been precluded by a 24 separate scene setting type of meeting, to 25 allow your point of Dr Britto --- to remind</b></p> <p style="text-align: center;">Page 192</p>

48 (Pages 189 to 192)



<p>1 <b>himself of the various bits of the act and then</b>  2 <b>Dr Britto might have said, "Could you give</b>  3 <b>me more information on that particular</b>  4 <b>point," so for me this was part of a process,</b>  5 <b>the start of a process and hindsight is</b>  6 <b>hindsight but, yes, I think we could have</b>  7 <b>probably gone into --- including myself on</b>  8 <b>my issues, but this is what I thought was the</b>  9 <b>start of a process where more information</b>  10 <b>would have been provided. Mr McGrail</b>  11 <b>would have made his representations, that the</b>  12 <b>GPA had then sort of gone into recess and</b>  13 <b>considered views and quite within their right</b>  14 <b>to ask further questions if not evidence from</b>  15 <b>the Chief Minister or I as well as Mr</b>  16 <b>McGrail.</b>  17 Q. The GPA met on 21 May but I think it is  18 right that you did not attend for obvious  19 reasons.  20 <b>A. Well, it was correct that I didn't and it</b>  21 <b>was right that I didn't.</b>  22 Q. Yes, yes. Did you have any contact with  23 your GPA colleagues before that meeting?  24 <b>A. Absolutely not.</b>  25 Q. What about afterwards?</p> <p style="text-align: center;">Page 193</p>	<p>1 Q. You say that he showed them to you, in  2 terms of --- in hard copy or did he send them  3 to you?  4 <b>A. No, I think it was sent to me.</b>  5 Q. Before they were sent or afterwards --- or  6 afterwards?  7 <b>A. I can't be certain on that. I remember if it</b>  8 <b>was the same letters, you know, tweaking a</b>  9 <b>couple of typos and the Chief Minister saying</b>  10 <b>his school teacher will be upset with him for</b>  11 <b>making such errors which infers that I saw</b>  12 <b>them before they were sent.</b>  13 Q. Have you since read the letters sent to Mr  14 McGrail on 22 May?  15 <b>A. Yes, I have, yes.</b>  16 Q. In your view, do they sufficiently set out  17 the case that Mr McGrail needed to address  18 in his representations?  19 <b>A. My instinct is to say yes, but if you want</b>  20 <b>me to answer that more definitively, I would</b>  21 <b>need a second or two to remind myself of the</b>  22 <b>letters.</b>  23 Q. So why do we not go to C4282 and if we  24 look at 4283, the highlighted parts are the  25 parts that the Chief Minister either inserted or</p> <p style="text-align: center;">Page 195</p>
<p>1 <b>A. I don't believe I did.</b>  2 Q. How did you learn the result of the GPA  3 meeting?  4 <b>A. I think it was by letter. There may have</b>  5 <b>been a pre-emptive telephone call from Dr</b>  6 <b>Britto or the Chief Minister but it was the</b>  7 <b>letter --- I think I had a tip-off and it may</b>  8 <b>have been Dr Britto to myself but it was --- I</b>  9 <b>mean, I wanted to wait to see this in writing.</b>  10 Q. When you say the letter, do you say that  11 there was a letter from the GPA to you  12 informing you of the GPA's decision?  13 <b>A. It might have been an email --- I think</b>  14 <b>there's something in my mind around the</b>  15 <b>evidence I have or something that I've seen in</b>  16 <b>the chronological evidence of --- no, I can't</b>  17 <b>be sure on that.</b>  18 Q. You were referring earlier to the letters  19 that the Chief Minister helped to draft, did  20 the Chief Minister seek any input from you  21 as to the parts of the letters that referred to  22 you?  23 <b>A. As I said, I think he showed them to me.</b>  24 <b>I don't think I had comments. I think the</b>  25 <b>elements of my concerns were well covered.</b></p> <p style="text-align: center;">Page 194</p>	<p>1 amended, so C4283 sets out under 3 and 4,  2 probity and integrity, "It was communicated  3 to me that both the Governor and the Chief  4 Minister felt that their dealings with you have  5 left them with the sense that you are lacking  6 in both probity and integrity ...." sorry, I will  7 let you get to that. I am looking at the  8 second page of that letter.  9 THE CHAIRMAN: We only have the first  10 page.  11 THE WITNESS: I only have the first page.  12 MR SANTOS: (To the witness): I am sorry.  13 I am only going to show you one sentence, or  14 two sentences.  15 <b>A. Okay.</b>  16 Q. It is under the heading 3 and 4, probity  17 and integrity. If you want to look at the  18 whole of the letter ----  19 <b>A. No, that is fine.</b>  20 Q. "It was communicated to me that both the  21 Governor and the Chief Minister felt that  22 their dealings with you have left them with  23 the sense that you are lacking in both probity  24 and integrity. The maritime incident is one  25 case in point." Were there any other cases in</p> <p style="text-align: center;">Page 196</p>

49 (Pages 193 to 196)

<p>1 point as far as you were concerned which had 2 left you with the sense that Mr McGrail was 3 lacking in both probity and integrity? 4 <b>A. For me personally, individually? No.</b> 5 Q. That is the closest we get to an express 6 reference to Operation Delhi and the alleged 7 lie, do you think that that gave Mr McGrail 8 enough information to understand the case 9 that he had to meet in representations? 10 <b>A. I don't think it did in the letter but my 11 scenario planning of the process was that 12 issues would be put to Mr McGrail in 13 advance of a meeting with the GPA where 14 Mr McGrail would be perfectly entitled to 15 say, "I'd like to see the detail of that," and 16 then the detail would have to be provided. 17 On a point of note, I thought the process of 18 the GPA section 34 would take some time.</b> 19 Q. In terms of the earlier letter, I think we 20 should give you the chance to look at that 21 one as well, so give me a second to get the 22 reference; C4315, please, if we can look at 23 that, it says, "In view of the grave concerns 24 expressed by both the Governor and the 25 Chief Minister in respect of certain aspects of</p> <p style="text-align: center;">Page 197</p>	<p>1 <b>A. Absolutely.</b> 2 Q. On 29 May 2020, Gomez &amp; Co sent a 3 letter to the GPA containing representations, 4 so if we can go to C4652, please, you write 5 to the FCDO updating on that letter and you 6 say, "To update you further, the Chair of the 7 GPA received at six o'clock this evening a 28 8 page letter from the Commissioner of 9 Police's legal representative declining the 10 Gibraltar Police authority's request to retire. 11 Whilst I will of course consider his 12 representations, it looks as if I will have to 13 exercise my powers under the Police Act. 14 The CM and I have agreed that we should 15 meet early next week with the AG as our 16 honorary legal adviser and chair of the GPA 17 to discuss a response and will be doing so on 18 Tuesday at the Convent. Not unexpected but 19 disappointing, not least as the letter calls into 20 question my conduct and impartiality of 21 which I am certain, as is the AG, that I have 22 nothing to worry about." You state, "It looks 23 as if I will have to exercise my powers under 24 the Police Act," why was that your view 25 given that the GPA had not yet withdrawn</p> <p style="text-align: center;">Page 199</p>
<p>1 policing that had led to a serious and 2 regrettable loss of confidence in you as 3 Commissioner, the authority feels that it is 4 left with no option but to exercise the powers 5 afforded to the authority under section 34(1) 6 of the Police Act. Given the above, the 7 authority invites you to retire in the interests 8 of policing in Gibraltar." Do you think that 9 that was consistent with a section 34 --- the 10 order set out in section 34? 11 <b>A. No.</b> 12 Q. And you say you saw this letter before it 13 went out? 14 <b>A. I would have to remind myself of that. I 15 thought --- I assumed and thought that the 16 letters before they went were shared with me. 17 I remember reading this and thinking, "Oh, 18 dear," because the authority --- for me this 19 was the start of a default because, with 20 respect, it should not have invited the 21 Commissioner of Police to retire until after 22 they had heard his representations. That was 23 my understanding of the process.</b> 24 Q. Was that your understanding right from 25 the outset?</p> <p style="text-align: center;">Page 198</p>	<p>1 the invitation to retire? 2 <b>A. Because I could see where this was 3 going. It doesn't need a crystal ball.</b> 4 Q. You state, "... the letter calls into question 5 my conduct and impartiality of which I am 6 certain, as is the AG, that I have nothing to 7 worry about." Do you maintain that your 8 conduct throughout the process was beyond 9 reproach? 10 <b>A. I may not have got everything right but I 11 don't think in terms of process I got much 12 wrong and in terms of how I conducted 13 myself, I think I --- my conscience is clear.</b> 14 Q. If we can go to A257, please, this is 15 towards the end of your first affidavit, 26.1, 16 where you say, "The decision to invoke the 17 procedure relating to the exercise of my 18 power under 19 section 13 of the Police Act to call for the 20 resignation of Mr McGrail as Commissioner 21 of Police was entirely my own. At no time 22 was I put under any pressure by any person, 23 but in particular by the Chief Minister, to 24 decide on the course of action outlined 25 above, although of course I was comforted</p> <p style="text-align: center;">Page 200</p>

50 (Pages 197 to 200)

<p>1 by the fact that he shared my view and would                  2 be supportive of my decision if I took it."                  3 Do you think you did enough to uphold the                  4 constitutional separations of functions                  5 between the Crown and the executive on the                  6 issue of policing?                  7 <b>A. In the context of Gibraltar, the time and                  8 the moment, yes, I do.</b>                  9 Q. Could you have done more to ensure that                  10 the GPA were left to carry out the section 34                  11 process properly, fairly and independently?                  12 <b>A. I think it was a safe assumption for a                  13 Governor to make that the GPA didn't need                  14 any reminders of how to do that from the                  15 Governor.</b>                  16 Q. Can we go to B1445, please, these are                  17 messages between you, the Chief Minister                  18 and it seems to be that you are arranging a                  19 meeting and the Chief Minister says,                  20 "Middy, AG and Joey works for me, I've                  21 checked with the others, thanks." Did that                  22 meeting go ahead?                  23 <b>A. I would be surprised if it didn't. How it                  24 went ahead, whether it was teleconference,                  25 video or in person, I can't remember.</b></p> <p style="text-align: center;">Page 201</p>	<p>1 (Short adjournment)                  2 (15.27)                  3 NICHOLAS PYLE (Continued):                  4 Questioned by MR SANTOS (Continued):                  5 Q. Mr Pyle, just to go back to one of the                  6 points we were covering earlier, if we can                  7 look at section 13 very briefly, this is the                  8 Governor's powers in default by authority,                  9 and it says, "The following powers are                  10 exercisable by the Governor where the                  11 authority has failed to discharge or perform a                  12 responsibility imposed on the authority under                  13 this Act," and you have the power to require                  14 a report, to submit the force inspection, direct                  15 that an inquiry into policing in Gibraltar be                  16 made and then, over the page, is suspend                  17 from duty or call for the resignation of the                  18 Commissioner. If we can just focus on the                  19 opening wording of that section again, "The                  20 following powers are exercisable by the                  21 Governor where the authority has failed to                  22 discharge or perform a responsibility                  23 imposed on the authority under this Act," if                  24 you believed that the GPA would conduct a                  25 fair and independent section 34 process, why</p> <p style="text-align: center;">Page 203</p>
<p>1 Q. Do you recall what was discussed at that                  2 meeting?                  3 <b>A. I think it was probably on the way                  4 forward in terms of responding to the letter                  5 from Mr Gomez to the GPA.</b>                  6 Q. Would you accept that that was a                  7 coordinated response?                  8 <b>A. I think it's quite right that we consulted                  9 each other as the letter, which I gather from a                  10 comment the other day, we should not have                  11 received, bearing in mind it was marked,                  12 "private and confidential." It is quite right                  13 that we should respond individually but                  14 discuss how we were going to do so.</b>                  15 MR SANTOS: I am just looking at the time,                  16 sir, it is quarter past three, I wonder whether                  17 we should take our mid-afternoon break now.                  18 Just in terms of a progress update, I suspect I                  19 will be another three quarters of an hour.                  20 THE CHAIRMAN: We will have a short                  21 break, you take three quarters of an hour and                  22 then we will probably finish for the day, I                  23 think.                  24 MR SANTOS: Thank you.                  25 (15.15)</p> <p style="text-align: center;">Page 202</p>	<p>1 refer in the same conversation that sought to                  2 trigger that process to a power which only                  3 comes into --- which only becomes                  4 exercisable where the authority has failed to                  5 discharge that responsibility?                  6 <b>A. It was to make the point of the                  7 seriousness and the absolute application of                  8 those sections there that the GPA had to                  9 follow and that they would be under scrutiny                  10 because if they didn't, and if they were in                  11 default, it would come down to me, so I was                  12 just moving ahead and going through the                  13 paragraph 13.</b>                  14 Q. Can we now look at C4715, please, this is                  15 an exchange between you and the Chief                  16 Minister on 4 June and if we can just look at                  17 the bottom of that page, the Chief Minister                  18 forwards to you --- actually, sorry, if we can                  19 go on to the next page, we can see at the                  20 bottom of that page a report --- an email from                  21 the Assistant Commissioner Ullger --- if we                  22 can just go to the bottom of this page, sorry,                  23 "Dear Chief Minister, please find attached                  24 my report to you with regard to the                  25 accessories fitted to the RGP vessels as you</p> <p style="text-align: center;">Page 204</p>

<p>1 requested." If we go back up the chain, the 2 Chief Minister forwards that to you and then 3 you say, "CM, thanks, tempted to suggest we 4 go straight for section 13(1)F," and then he 5 says, "I think we may have no alternative in 6 the interests of the rule of law and peace, 7 order and good governance of Gibraltar. I 8 have growing and evermore serious concerns 9 about this issue." You say, "I, too, am more 10 worried than hitherto. The panorama has 11 posed the following question, will the 12 Convent confirm if the Commissioner of 13 Police, Ian McGrail, has either handed in his 14 resignation or that he has been asked to 15 tender his resignation. The only thing I can 16 say is that this is a matter for the GPA but I 17 will not be replying. Perhaps we should, 18 however, start to draw up lines, perhaps the 19 three of us could talk through the options. I 20 have to pop over this afternoon tomorrow 21 (?)." In your view why did this new piece of 22 information justify you going straight section 23 13(1)F? 24 <b>A. So I think it's in the whole chain, so I 25 might --- if we can go --- I want to refresh</b></p> <p style="text-align: center;">Page 205</p>	<p>1 <b>A. So I think this may infer that I was aware 2 that this was the likely outcome of their 3 deliberations and that --- and I do remember 4 that when I had final confirmation of their 5 default, the sense of foreboding, ill-boding 6 and --- yes, that was not one of my most 7 memorable moments in Gibraltar.</b> 8 Q. At that stage and in light of that report, 9 did you ask Mr McGrail for representations 10 on this issue as to the attachment to the boat? 11 <b>A. I don't think so. I mean, the Chief 12 Minister had done that. For me, how and 13 why it was fitted isn't really the important 14 point. The important point was that it had 15 been fitted.</b> 16 Q. If we go to C4727, please, there is an 17 email that you send --- the second email is 18 one that you send to the Attorney General on 19 5 June at 9.25 and you say, "Dear Michael, I 20 have reflected on the discussion we had 21 yesterday afternoon on the issue of the 22 Commissioner of Police. My preferred 23 course of action, recognising the need to 24 resolve this issue quickly, not least in the 25 light of media scrutiny, that I take no action</p> <p style="text-align: center;">Page 207</p>
<p>1 <b>myself. The report on the collision, so the 2 television report, I think that included --- was 3 that the report that included a video of the 4 chase?</b> 5 Q. I believe that is right, yes. 6 <b>A. So the totality of that email exchange, 7 rather than the more specific point, I 8 understand the message from Richard Ullger 9 about the log defender being fitted on to the 10 boat which is why I refer to it as being 11 weaponised in Gibraltar, so I think again that 12 just, you know, brought together --- and I 13 didn't really also in my scenario planning see 14 any other option in going to section 13(1)F.</b> 15 Q. When you say "go straight to section 16 13(1)F" were you suggesting bypassing the 17 GPS? 18 <b>A. No, no, no, no, only in --- but I think by 19 then my sense was that --- did we know that 20 they were in default?</b> 21 Q. I think it was --- 22 <b>A. In June?</b> 23 Q. --- on the next day that the letter came 24 through although I think you had had a 25 discussion with the Attorney General ----</p> <p style="text-align: center;">Page 206</p>	<p>1 until I have seen the letters that the GPA 2 chair, the Chief Minister and yourself are 3 writing to the GPA in response to the Gomez 4 letter. This would allow me to reflect and 5 consider all representations, including the 6 Commissioner's via the comments letter 7 before speaking to the Commissioner." Just 8 focusing on the first bit, it looks from this 9 email that there was a meeting between you 10 and the Attorney General on 4 June. Do you 11 agree? 12 <b>A. Yes.</b> 13 Q. Actually I can assist you further, if we go 14 to C4725, this is --- and if you go to the 15 second email in the chain, this is an email 16 from you to a number of recipients, or 17 someone with an extremely long name, one 18 of the two, and you say at 9.54, "As 19 discussed yesterday, things have taken a turn 20 for the worse. The AG told me yesterday 21 that at the Gibraltar Police Authority meeting 22 that was held last week to consider the 23 position of the Commissioner of Police was 24 not quorate. Its deliberations are, therefore, 25 null and void and the chair of the GPA</p> <p style="text-align: center;">Page 208</p>

52 (Pages 205 to 208)

<p>1 should, therefore, not have called for the 2 Commissioner of Police to resign. I should 3 get a letter this morning from the chair 4 informing me of this." Do you know how the 5 Attorney General came to be aware of this 6 the day before the letter arrived? 7 <b>A. No, I don't know.</b> 8 Q. "The Attorney General advised there is 9 no point in looking to appoint new GPA 10 members as they are chosen by the public 11 services commissioner from a list proposed 12 by the CMNI. They are then appointed by 13 the Governor. Any new GPA members 14 would, therefore, likely to be perceived as 15 biased not least by a court. This leaves 16 section 13(1)F of the Police Act as the only 17 way forward to secure the resignation of the 18 Commissioner should it be determined that 19 this is the best way forward. The relevant 20 sections of the Police Act are attached." So it 21 does look as if you had a meeting with the 22 Attorney General where he advised you on 23 the next steps? 24 <b>A. Yes.</b> 25 Q. And then the email we were looking at,</p> <p style="text-align: center;">Page 209</p>	<p>1 recognising the need to resolve this issue 2 quickly, not least in the light of media 3 scrutiny, is that I take no action until I have 4 seen the letters," sorry, and then if we go to 5 the previous page --- yes, the end of that 6 email, the final sentence, "Apologies for the 7 time frame but with a media storm brewing, I 8 would like to resolve this as soon as possible 9 and certainly before Sir David Steel arrives 10 on Wednesday." I wanted to show you the 11 basis for my question. 12 <b>A. Thank you.</b> 13 Q. Is there a risk that this hurry to resolve 14 matters before Sir David Steel arrived led 15 you to take steps in June 2020 that you would 16 not otherwise have taken? 17 <b>A. I don't think so. I think the --- and I used 18 the word "speed" and "haste" carefully, that I 19 was looking to conclude the issue would 20 have been the same whether Sir David Steel 21 was arriving on Wednesday or not. I would 22 have looked to conclude matters quickly. I 23 thought it was time to bring the saga to a 24 conclusion.</b> 25 Q. Then if we go to 4743, please, the final</p> <p style="text-align: center;">Page 211</p>
<p>1 which follows on the next day, is yours to the 2 Attorney General where you say, "I have 3 reflected on the decision we had yesterday 4 afternoon ...." and you talk about taking 5 action but that final sentence, "This would 6 allow me to reflect and consider all 7 representations including the Commissioner's 8 via this Gomez letter before speaking to the 9 Commissioner," I just wanted to ask you, it 10 appears from these exchanges that you are 11 very eager to resolve the issue before Sir 12 David Steel's arrival as Governor which was 13 in a matter of days, perhaps five days, why 14 was that? 15 <b>A. That was in part I think so that Sir David 16 didn't have on his plate as one of the first 17 things he had to focus on, was what I might 18 have referred to as --- to a colleague in 19 London, as a complete mess of a situation 20 which would make his first few weeks 21 difficult.</b> 22 Q. I just want to --- I think I have shown you 23 the wrong sentence in advance of that 24 question, so it is the second sentence in that 25 email, "My preferred course of action</p> <p style="text-align: center;">Page 210</p>	<p>1 paragraph of that letter says, "We have taken 2 independent legal advice and have been 3 advised that the process which we have 4 adopted under section 34 of the Police Act is 5 fundamentally flawed and should be 6 withdrawn. However, we were also advised 7 that the complaints by you and the Chief 8 Minister remain live and have to be 9 determined. We have also been advised that 10 the Authority as presently constituted is 11 vulnerable to challenge on the grounds of 12 bias. The Authority considers that as 13 presently constituted it is unable to process 14 the complaints without being vulnerable to 15 legal challenge and is not, therefore, prepared 16 to do so." When you received that letter and 17 the GPA considered that it was unable to 18 process the complaints, did that make you 19 pause and consider whether it would be fair 20 to proceed with the section 13 process? 21 <b>A. I think it made me pause and then reflect 22 that I had no option but to go to section F. I 23 took this as the default of the GPA.</b> 24 Q. Did you ask the GPA which aspects of 25 the section 34 process they concluded were</p> <p style="text-align: center;">Page 212</p>

53 (Pages 209 to 212)

<p>1 fundamentally flawed?</p> <p>2 <b>A. I don't believe I did but I believe it was</b></p> <p>3 <b>because they weren't a quorate. Where I</b></p> <p>4 <b>picked that information up from I can't be</b></p> <p>5 <b>certain.</b></p> <p>6 Q. Did you consider that anything that you</p> <p>7 or the Chief Minister did and your</p> <p>8 interactions with Dr Britto may have</p> <p>9 contributed to those fundamental flaws?</p> <p>10 (15.40)</p> <p>11 <b>A. Could you repeat the last bit, please? I</b></p> <p>12 <b>didn't hear.</b></p> <p>13 Q. Your interactions with Dr Britto, whether</p> <p>14 those could have contributed to the</p> <p>15 fundamental flaws.</p> <p>16 <b>A. No.</b></p> <p>17 Q. Because if it was just a question of</p> <p>18 quorum, then could they not have simply had</p> <p>19 a quorate meeting and considered --</p> <p>20 <b>A. No, I think I took advice from the</b></p> <p>21 <b>Attorney General on that, and London and</b></p> <p>22 <b>the advice from Michael is it couldn't be</b></p> <p>23 <b>reconstituted. I think we've been through</b></p> <p>24 <b>that earlier in the proceedings.</b></p> <p>25 Q. You then sought the Attorney General's</p> <p style="text-align: center;">Page 213</p>	<p>1 one where neither the current GPA nor a</p> <p>2 newly-constituted GPA can discharge or</p> <p>3 perform its responsibility under section 34 of</p> <p>4 The Police Act. I therefore consider that the</p> <p>5 current situation is one which falls within</p> <p>6 section 13 of the Police Act. Section 13(1)</p> <p>7 provides that a series of powers are</p> <p>8 exercisable by the Governor where the GPA</p> <p>9 has failed to discharge or perform the</p> <p>10 responsibility imposed on the GPA under the</p> <p>11 Police Act. One such power is the power to</p> <p>12 suspend from duty or call for the resignation</p> <p>13 of the Commissioner. My advice is that in</p> <p>14 the circumstances of this case, that power is</p> <p>15 available to you if you were to decide to avail</p> <p>16 yourself of it."</p> <p>17 Q. The advice here is about section 13(1)(f).</p> <p>18 Had you considered using one of the other</p> <p>19 less draconian powers in section 13 as a</p> <p>20 starting point before that draconian power?</p> <p>21 <b>A. I had looked at the options. I seem to</b></p> <p>22 <b>remember in my own mind saying that</b></p> <p>23 <b>neither the current GPA can discharge any</b></p> <p>24 <b>responsibilities under section 34. We</b></p> <p>25 <b>couldn't constitute a new GPA. I quite</b></p> <p style="text-align: center;">Page 215</p>
<p>1 advice on how to proceed. At C4796, is the</p> <p>2 exchange and there is the advice from the</p> <p>3 Attorney General to you. Is there a reason</p> <p>4 why you did not copy the Chief Minister into</p> <p>5 this correspondence? I think because - that's</p> <p>6 a good point. Normally I would have done,</p> <p>7 but this is firmly in governorship role rather</p> <p>8 than so in that split of responsibilities and</p> <p>9 leadership I've talked about before, this could</p> <p>10 only be a decision for the Governor. I'd be</p> <p>11 surprised if I didn't consult the Chief</p> <p>12 Minister and it may be that we were</p> <p>13 discussing other issues when I mentioned</p> <p>14 him or sought his views on what I was</p> <p>15 thinking was likely to happen or what I was</p> <p>16 looking to do subject to the advice of the</p> <p>17 Attorney General.</p> <p>18 Q. Were you aware at the time that the</p> <p>19 Attorney General had met with Hassans to</p> <p>20 discuss the Operation Delhi search warrants?</p> <p>21 <b>A. No, but neither would I think it relevant</b></p> <p>22 <b>to what I was looking at at the time.</b></p> <p>23 Q. The last lengthy paragraph in that - sorry,</p> <p>24 not yours, but Mr Llamas's rather - starts</p> <p>25 accordingly. "Accordingly, the position is</p> <p style="text-align: center;">Page 214</p>	<p>1 <b>quickly concluded that the only option</b></p> <p>2 <b>available to me - whether that was right or</b></p> <p>3 <b>not it was my conclusion and I do remember</b></p> <p>4 <b>discussing this with London - was 31(f).</b></p> <p>5 Q. You then met with the Chief Minister and</p> <p>6 the Attorney General on 5 June to discuss</p> <p>7 how to proceed. If we go to your evidence at</p> <p>8 paragraph 16.3, A243, you say, "I then met</p> <p>9 with the Chief Minister and the Attorney</p> <p>10 General to discuss the situation, given that I</p> <p>11 had not expected to be in the position of</p> <p>12 having to consider actually using Governor's</p> <p>13 powers under Section 13." Is this not</p> <p>14 somewhat at odds with what you had told Dr</p> <p>15 Britto on 18 May, that you would be</p> <p>16 exercising your section 13 powers unless</p> <p>17 there was strong and persuasive reasons not</p> <p>18 to do so?</p> <p>19 <b>A. No, I think the word I used was, "I would</b></p> <p>20 <b>be prepared to", which is slightly different. I</b></p> <p>21 <b>wasn't expecting to at all.</b></p> <p>22 Q. Then at paragraph 16.4 you say: "The</p> <p>23 Chief Minister and I were keen that I should</p> <p>24 proceed quickly as we both wanted the</p> <p>25 matter resolved one way or the other, if</p> <p style="text-align: center;">Page 216</p>

54 (Pages 213 to 216)

1 possible, before the new Governor arrived on  
 2 10 June, so that his arrival and start of tenure  
 3 would not be marred by such a controversial,  
 4 ongoing issue." If we go to C4771, this is an  
 5 exchange between you and the Governor on  
 6 5 June 2020 and the Governor - the now  
 7 Governor - says, "Dear Nick, thank you.  
 8 This matter has been the reason that I too  
 9 have not been troubling you as I know that  
 10 you have much on your plate at the moment.  
 11 I discussed the whole issue with the person  
 12 this morning as well as with PUS. Both  
 13 think you are doing a cracking job in difficult  
 14 circumstances. I just hope the actions you are  
 15 taking will address the issue. Take good care  
 16 and an extra pair of hands to help you are  
 17 flying out next Wednesday." Would you  
 18 accept that message that if necessary Sir  
 19 David was willing to address the issue on his  
 20 arrival and it was not imperative for you to  
 21 have it resolved before he arrived?  
 22 **A. I read it in a slightly different way.**  
 23 **Worth noting that the Permanent Under-**  
 24 **Secretary was Sir Philip Barton who is a**  
 25 **former Deputy Governor so somebody who**

Page 217

1 **knew and understood Gibraltar well,**  
 2 **particularly as the time that Sir Philip was**  
 3 **here was quite a tense moment at times in the**  
 4 **relationship. "Both think you are doing a**  
 5 **cracking job in difficult circumstances. I**  
 6 **hope the actions you are taking will address**  
 7 **the issue", so I think the issue was**  
 8 **concluding before Sir David arrives, but I**  
 9 **think within that is of course as I've said in**  
 10 **my email, I hoped to conclude before. As I**  
 11 **think I said earlier, I fully expected a robust**  
 12 **GPA approach to section 34 taking time,**  
 13 **which may then have crept over into Sir**  
 14 **David's arrival, and I think the point I want to**  
 15 **make on this is that when I went to see the**  
 16 **Chief Minister on Friday the 18th, not only**  
 17 **did I not know when Sir David was arriving.**  
 18 **At the time there was a question of whether**  
 19 **he would be arriving, which was resolved**  
 20 **and picked up with London. The exact**  
 21 **moment I knew of the date of his arrival, I**  
 22 **can't recollect, and certainly on the Monday,**  
 23 **with the meeting with Dr Britto, that was the**  
 24 **same position.**  
 25 Q. It seems clear from his email here that he

Page 218

1 is saying that he is going to be there from the  
 2 Wednesday.  
 3 **A. Yes.**  
 4 Q. Were you aware of section 22(3) of the  
 5 Constitution at the time --  
 6 **A. Yes.**  
 7 Q. Familiar with it?  
 8 **A. Yes.**  
 9 Q. Did you consider whether, if you needed  
 10 to exercise your section 13 powers, you  
 11 might have been prevented by section 22(3)  
 12 from doing so?  
 13 **A. No, because I was and I now remain**  
 14 **under the impression that one can only**  
 15 **assume the role of Governor once one has**  
 16 **taken the oath.**  
 17 Q. So, in your views he was not about to  
 18 assume the role at that point?  
 19 **A. He was, and the Constitution was**  
 20 **carefully crafted and brilliantly negotiated by**  
 21 **a former Chief Secretary. I would suggest**  
 22 **that for me as somebody who is not well**  
 23 **versed in legal area that that has left a gap,**  
 24 **that perhaps it wasn't intended, as much as**  
 25 **there's a gap in legislation around the airfield**

Page 219

1 **incident. It cannot be right that you cannot**  
 2 **have - you cannot have a governor in situ**  
 3 **who doesn't have the authority to take actions**  
 4 **and you cannot have a governor as governor,**  
 5 **in my opinion - I stand to be corrected -**  
 6 **until they have taken the oath.**  
 7 Q. Can we now go to C4782, please. This is  
 8 after your meeting with the Attorney General  
 9 and the Chief Minister where you update the  
 10 FCDO with your plan. Just picking up from  
 11 the second substantive paragraph, "The Chief  
 12 Minister is, however, slightly worried that  
 13 the Commissioner will use the weekend to  
 14 seek an injunction. I said I do not think one  
 15 could be sought yet alone approved as I  
 16 would not be disclosing my intent to the  
 17 Commissioner and would merely be  
 18 following the process as per the Police Acts.  
 19 I am meeting the CM and AG at five to talk  
 20 through this but told the AG my strong  
 21 preference was to create a gap for the reasons  
 22 we discussed." Did the CM explain why he  
 23 was worried that Mr McGrail would use the  
 24 weekend to seek an injunction?  
 25 **A. No.**

Page 220

<p>1 Q. What do you mean by, "My strong 2 preference was to create a gap for the reasons 3 we discussed"?</p> <p>4 <b>A. Because it was the correct thing to do. I'd 5 made a commitment and I was going to make 6 the commitment to Mr McGrail that I would 7 review all the papers, I would consider. This 8 issue put me in an incredibly difficult 9 position, one I never asked for or envisaged 10 that I would face, and I wanted to get it right 11 in the right way for the right reasons.</b></p> <p>12 Q. When you say you would not be 13 disclosing your intent to the Commissioner, 14 does that mean that at that point your 15 intention was to go down the section 13(1)(f) 16 route?</p> <p>17 <b>A. I thought it was the only option available. 18 I was still - I wanted time to clear my mind 19 and this was a Friday, so asking the 20 Commissioner (inaudible) him on Monday I 21 knew I would spend the weekend going 22 through all of this but as I said, my mind and 23 my approach was 85, 95 per cent firm in the 24 process but I just wanted to reflect and step 25 back and use the pressure to make sure that</b></p> <p style="text-align: center;">Page 221</p>	<p>1 <b>A. Absolutely not, no. I can't stress enough 2 I was not minded and not bothered about 3 Operation Delhi to any degree that would 4 influence anything I did. My sort of 5 acceptance of the Chief Minister's reasons for 6 loss of confidence were what I would accept 7 the Chief Minister to do if I expressed my 8 reasons for loss of confidence.</b></p> <p>9 Q. Then can we go to A243 which is your 10 account in your evidence at 17.1 and 17.2 of 11 the meeting between Mr McGrail and you on 12 5 June 2020. "Mr McGrail came to see me 13 late in the afternoon of Friday 5th June, as 14 requested by me. He immediately said that he 15 had a note that he wanted me to read. I said I 16 too had something I wanted him to read, but 17 this was not a meeting to read new 18 documents and to then immediately get into a 19 debate about the issues. I said the meeting 20 was to allow me to set out the process 21 moving forward. I said that I would review 22 all the papers in my possession over the 23 weekend, including the note that he had just 24 given me. I said I would then like to see him 25 on Monday during which I would inform him</p> <p style="text-align: center;">Page 223</p>
<p>1 <b>what I was doing was correct.</b></p> <p>2 Q. Then at the next sentence you say: 3 "Finally, the AG accepted that there could be 4 the perception of a conflict between his role 5 as our HLA and his involvement in 6 proceedings. He thought advice from Paolo 7 well worth seeking." Had you raised that 8 possible conflict or did he?</p> <p>9 <b>A. No, I think I had. I'd had that discussion 10 with the Attorney General a couple of times 11 over my time in the Convent. I can't - I'm 12 trying to draw in before you ask me what 13 caused me to and what element of conflict 14 there could be. Michael thought advice from 15 the person mentioned there was well worth 16 seeking. I had been doing that for a while. 17 That person was part of the weekly meeting 18 and the collective distribution that I had been 19 sending emails to over the last few weeks.</b></p> <p>20 Q. What proceedings were you referring to?</p> <p>21 <b>A. I think the way forward.</b></p> <p>22 Q. In terms of potential future proceedings?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Nothing to do with Operation Delhi or 25 anything like that?</p> <p style="text-align: center;">Page 222</p>	<p>1 of my decision as to the way forward. I said 2 that whilst I had not made up my mind as to 3 whether I would use the powers invested in 4 me, I would be prepared to do so." Mr 5 McGrail's recollection is that you said that 6 you asked him to return to see him on the 7 following Monday with a view of invoking 8 your powers under section 13. Did you say 9 that?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Was your reference to section 13 12 intended to be a threat to Mr McGrail to 13 bring about his own retirement?</p> <p>14 <b>A. No, it was stating the reality of the issue.</b></p> <p>15 Q. Do you accept that it could nevertheless 16 have had that effect?</p> <p>17 <b>A. Possibly. I mean, that wasn't the intent 18 but I think given that I had said that to Dr 19 Britto at our meeting, I have been consistent 20 in, you know, "be under no illusion that I 21 am", "I would be prepared, I am prepared to 22 use the powers should I deem that's the way 23 forward."</b></p> <p>24 Q. At 17.2 you say: "2 I asked Mr McGrail 25 if he knew the reasons behind my loss of</p> <p style="text-align: center;">Page 224</p>

56 (Pages 221 to 224)



<p>1 confidence in him. He said he did not. I said 2 they were contained in the letter I was going 3 to hand over to him, which was a copy of my 4 letter dated 3 June to the Chairman of the 5 GPA that I had written in response to the 6 letter dated 27 May 2020 written to the GP A 7 by Charles Gomez on his behalf, and to 8 which I had taken some offence. I told him 9 that having said to the Chief Minister and 10 Attorney General that I would be doing this, 11 they both said I could hand over copies of 12 their own letters to Charles Gomez &amp; Co. I 13 said he should read all three letters before we 14 meet on Monday. I then handed Mr McGrail 15 copies of the Three Letters." If we can go to 16 C4860, please, if we just look at the next 17 email down - sorry, just above that, it is an 18 email at 21.49. We may have been on that, 19 on the writing, further down. Yes, there. 20 This is 7 June: "Dear Ian, the purpose of 21 tomorrow's meeting is to allow me to hand 22 you a copy of a letter dated 3 June I sent to 23 the GPA Chair together with one sent by the 24 Attorney General and the Chief Minister, 25 both dated 5 June. I suggest we then meet in</p> <p style="text-align: center;">Page 225</p>	<p>1 <b>I had and I apologise if my statement got that</b> 2 <b>wrong, I can see from the evidence here. I'm</b> 3 <b>still surprised why I would get the dates</b> 4 <b>wrong and I apologise.</b> 5 Q. Do you think you gave Mr McGrail 6 enough time to consider the allegations in the 7 letters from Monday morning until 4 p.m. on 8 the same day? 9 <b>A. I think if I'd have been - which goes back</b> 10 <b>to this dilemma I have on the timing of this -</b> 11 <b>I would have given him more notice. I'd</b> 12 <b>have said, "Monday morning, here are the</b> 13 <b>letters. Come and see me tomorrow on the</b> 14 <b>Tuesday." So, again I can't really explain</b> 15 <b>that.</b> 16 Q. Can we now look at C4815, please? This 17 is your letter of 6 June. In response to the 18 email that Mr McGrail had handed you, 19 which refers to him feeling that he had no 20 option but to retire, and you say in the final 21 paragraph: "Before I review all the papers I 22 have on this matter in advance for our 23 meeting on Monday, can you please confirm 24 to me by no later than midday tomorrow 25 whether it is indeed your decision and if so</p> <p style="text-align: center;">Page 227</p>
<p>1 the afternoon at four to discuss matters." So, 2 it looks from that that in fact you did not 3 hand Mr McGrail copies of the three letters 4 until after the weekend, on the morning of 5 the Monday. Would you accept that? 6 <b>A. I do and I've thought about this over the</b> 7 <b>last few days. I still have a memory of Mr</b> 8 <b>McGrail coming into my office on the Friday</b> 9 <b>and handing me a copy of his. My</b> 10 <b>recollection is, "Here's mine but we're not</b> 11 <b>going to sit down and discuss the letters at</b> 12 <b>the moment." I thought I had given Mr</b> 13 <b>McGrail the letters on the Friday so that he</b> 14 <b>could look at them over the weekend. When</b> 15 <b>I asked him had he - was he aware of my</b> 16 <b>drivers and he said no, I was slightly taken</b> 17 <b>aback because of course the GPA were aware</b> 18 <b>of my drivers and I believe that they'd passed</b> 19 <b>them on to him so this was more a</b> 20 <b>confirmation than perhaps - I wouldn't say</b> 21 <b>respect but because, you know, I didn't need</b> 22 <b>to, I didn't have to hand over a copy of my</b> 23 <b>letter to Mr Gomez via the GPA to Mr</b> 24 <b>McGrail, but I just wanted to be open and</b> 25 <b>transparent at that stage with the information</b></p> <p style="text-align: center;">Page 226</p>	<p>1 whether you will be tendering your letter of 2 resignation on Monday with immediate 3 effect." You refer to "resign" here rather 4 than "retire", resignation. Was that a 5 deliberate decision or an oversight? 6 <b>A. No, that was an oversight and again I</b> 7 <b>apologise to Mr McGrail for that and I would</b> 8 <b>have corrected it had it been challenged.</b> 9 Q. Gomez &amp; Co replied on 7 June 2020 at 10 11.56 and you then immediately updated the 11 FCDO, if we can go to C4825. You say: 12 "The good news is confirmation that the COP 13 intends to retire and the issue now is how to 14 achieve this. My instinct is to allow the COP 15 time to work out a deal but this then means 16 Sir David will have arrived. What we don't 17 want is COP to withdraw his request and 18 lobby Sir David to keep his position." Why 19 was it your instinct to allow him time to work 20 out a deal? 21 <b>A. So that's securing the terms and</b> 22 <b>conditions of his retirement. That's just the</b> 23 <b>right thing to do. This is not something that</b> 24 <b>should be rushed.</b> 25 Q. If we go to C4837 and 4838, just the</p> <p style="text-align: center;">Page 228</p>

57 (Pages 225 to 228)

<p>1 bottom of 4837, this is a response which sets 2 out three options: a summary of their options 3 and their merits in advance of your meeting 4 that evening with the Chief Minister and the 5 Attorney General. Option one was call for 6 Commissioner's retirement by GPA. Option 7 two was Commissioner's suspension or call 8 for resignation pursuant to section 13(f) and 9 option three was a negotiated early 10 retirement and in option three you say - 11 sorry, you are told: "In his 5th and 7 June 12 emails, the Commissioner's lawyer indicates 13 that the Commissioner intends to apply for 14 early retirement on terms addressed to the 15 incoming governor. Although it is 16 unfortunate that this matter coincides with 17 the new Governor's arrival a negotiation 18 about the Commissioner's early retirement 19 has the advantage that in the event of a 20 stalemate, the incoming Governor still has 21 recourse to suspend the Commissioner 22 pursuant to section 13(f) with a limited risk 23 of a challenge given he has not been involved 24 in this situation to date. I share your view 25 that option three is the preferred approach</p> <p style="text-align: center;">Page 229</p>	<p>1 COP to withdraw his request and lobby Sir 2 David to keep his position." 3 <b>A. No, apologies for asking that. No, my 4 position was that we didn't need or it's not - 5 the thought of yes, saying, "I want early 6 retirement but I want to discuss and work out 7 the details of the package of the terms and 8 the conditions with a new Governor", didn't 9 make sense to me. So, the fact that Mr 10 McGrail had, through his lawyer sought early 11 retirement I felt that the terms and conditions 12 could be worked out and agreed before Sir 13 David arrived, which would then take away 14 partly the Chief Minister's slight worry so I 15 guess you could say, to answer the question, 16 it was a coming together of the minds but in 17 a slightly different way.</b> 18 Q. And then the final line on 4845, the final 19 paragraph, sorry, "I do remain slightly 20 uncomfortable and hope the Commissioner 21 sees sense." Why did you still remain 22 slightly uncomfortable? 23 <b>A. I did have a sense of feeling it may be 24 some of the letters from Mr Gomez. It wasn't 25 beyond possibility - I wouldn't say it was</b></p> <p style="text-align: center;">Page 231</p>
<p>1 and I am ready to speak at 5.30 on Teams if 2 that is helpful." However, if we now move 3 forward to 4845, after your meeting with the 4 Chief Minister and the Attorney General, you 5 say, "I've just met with the AG and CM. We 6 agreed that on balance we needed to protect 7 Sir David and felt that should COP still be in 8 office after his swearing-in, he would more 9 likely than not retract his request to retire and 10 appeal to Sir David thus taking us back to 11 square one. The issue is also in the public 12 domain with rumours and accusations 13 beginning to circulate. We agreed we needed 14 to stop this and the only way to do so to 15 conclude proceedings before Sir David's 16 swearing-in on Thursday." Were you 17 persuaded by the Chief Minister or the 18 Attorney General to change the view that you 19 had expressed previously? 20 <b>A. Just for clarity could you tell me what 21 change of view I had?</b> 22 Q. Well, earlier on you had said - 4825 - 23 "My instinct is to allow COP time to work 24 out a deal but this then means Sir David will 25 have arrived here. What we don't want is</p> <p style="text-align: center;">Page 230</p>	<p>1 <b>probable - that a delay that took us beyond 2 Sir David's arrival would then take us back 3 quite a way in resolving the issue, which, 4 given all equities, including the attention 5 from the media and elsewhere, I didn't think 6 was a good way forward.</b> 7 Q. You then met Mr McGrail on the 8 Monday morning at 10 a.m. Why did you 9 tell Mr McGrail that you did not want his 10 lawyer, Mr Gomez, to accompany him to the 11 meeting? 12 <b>A. Partly or possibly because I was slightly 13 angry with some of the tone of the 14 communications between - from Mr 15 McGrail's lawyer. I didn't think it - I sort of 16 slightly (inaudible) - I didn't then get into a 17 debate about all the issues etc., etc., so 18 having cleared my lines with both the Chief 19 Minister and London, I was quite clear on 20 what I was going to do.</b> 21 Q. Did Mr McGrail exit that meeting 22 agreeing that he would retire or was there 23 further discussion between you before that 24 was agreed? 25 <b>A. So, I think he replied to my note on the</b></p> <p style="text-align: center;">Page 232</p>

58 (Pages 229 to 232)

<p>1 <b>Sunday saying yes, he did want to take early</b>  2 <b>retirement, subject to terms being agreed, so</b>  3 <b>that with the note on Friday for me sort of</b>  4 <b>confirmed beyond reasonable doubt that Mr</b>  5 <b>McGrail wanted to take early retirement.</b>  6 Q. If we can go to your statement at 105,  7 page A43 - sorry, it is not your statement,  8 apologies. It is Mr McGrail's statement, 105,  9 A43. "At 10 on 8 June 2020 I attended NP's  10 office at the Convent. The meeting was held  11 standing in the Governor's office. He started  12 off the conversation referring to the letter my  13 lawyer had sent to the GPA which he said he  14 had taken serious offence to because of the  15 certain allegations made against him." Do  16 you agree that that took place?  17 <b>A. Yes, we - yes, yes.</b>  18 Q. Then he says: "He said that his  19 involvement in my matter was not  20 necessarily linked to the concerns the CM,  21 AG and GPA had about me but they did  22 overlap. He stated that he had concerns  23 about the incident at sea and the HMIC FRS  24 report and that these overlapped with  25 concerns of the CM, AG and GPA. He</p> <p style="text-align: center;">Page 233</p>	<p>1 Q. Well, he says that he asked you.  2 <b>A. Oh, he wanted him out. I would have</b>  3 <b>responded, "Not that I would want you out",</b>  4 <b>but I think the best way forward for the RGP</b>  5 <b>is a change of leadership" and I think I just</b>  6 <b>want to make one point as well, when Mr</b>  7 <b>McGrail said that he didn't know, as I said</b>  8 <b>before, he was written to by the GPA, setting</b>  9 <b>out in broad terms the concerns we had. So,</b>  10 <b>the purpose of me handing over my letter to</b>  11 <b>his lawyer was not to alert him for the first</b>  12 <b>time to the concerns; it was to add weight</b>  13 <b>and let him know in no uncertain terms the</b>  14 <b>seriousness in which I felt about the</b>  15 <b>situation.</b>  16 Q. Then at 108 he refers to the subsequent  17 meeting at 4 p.m. What was Mr McGrail's  18 demeanour at that 4 p.m. meeting as far as  19 you can recollect?  20 <b>A. I think I reported to London that he was</b>  21 <b>quite confident. Mr McGrail is a confident</b>  22 <b>person who protects himself in that way and</b>  23 <b>of course I am reminded that on the Friday</b>  24 <b>before, he'd already through his lawyer</b>  25 <b>written to the GPA asking to take early</b></p> <p style="text-align: center;">Page 235</p>
<p>1 provided me with an envelope containing the  2 three letters in question." Do you accept that  3 summary?  4 <b>A. Yes.</b>  5 Q. And then: "NP was taken aback that I had  6 not had notice of the particulars of the  7 allegations against me, which is why he  8 thought it fair that I was provided with a  9 copy of the letters." I think you have already  10 said that that is correct?  11 <b>A. Yes.</b>  12 Q. And then at paragraph 107, I just want to  13 focus on one sentence on the fourth line. "I  14 asked him flat whether he wanted me out to  15 which he said that he did." Do you recall an  16 exchange to that effect?  17 <b>A. I do, but not in those terms.</b>  18 Q. How do you recall it?  19 <b>A. I think it was, you know, quite obvious at</b>  20 <b>the time that I was looking for a change in</b>  21 <b>the leadership of the RGP.</b>  22 Q. Is that what you said to him?  23 <b>A. I don't think I would have used the word,</b>  24 <b>"out". It's not my language. It's not my</b>  25 <b>terminology.</b></p> <p style="text-align: center;">Page 234</p>	<p>1 <b>retirement, so - and I do note a comment Mr</b>  2 <b>McGrail used in his evidence that I put him</b>  3 <b>under intolerable pressure. The pressure</b>  4 <b>surely had been relieved somewhat on the</b>  5 <b>Friday with his letter by his legal</b>  6 <b>representative to the GPA asking to retire and</b>  7 <b>I would suggest the evidence proves that my</b>  8 <b>communications with Mr McGrail since the</b>  9 <b>Friday were quite temperate, quite neutral</b>  10 <b>language and indeed the offer to help him</b>  11 <b>secure the terms and conditions that he</b>  12 <b>wanted were in some way supportive.</b>  13 Q. He then says at 108: "By then it dawned  14 on me that my best option was to find the  15 best way out before I was made to suffer  16 even more. My mental health was very badly  17 affected. I had completed 36 years of service  18 and did not want to put in jeopardy my  19 pension entitlements. At four on the same  20 day I went back to see NP as requested and  21 told him that given the short period of time I  22 had been given to digest the three letters, I  23 would reserve my comments on them. I told  24 him that should he agree to it, I would be  25 submitting an application for early retirement</p> <p style="text-align: center;">Page 236</p>

59 (Pages 233 to 236)

<p>1 subject to certain personal terms. We then 2 discussed the terms of my retirement and he 3 took note of these. Basically, aside from 4 wanting to be reimbursed for the legal fees I 5 had to pay out to defend the ill-fated section 6 34 process, I wanted my retirement terms to 7 be as close to the situation I would have been 8 in had I not been forced to retire. A series of 9 emails and text messages followed." Do you 10 agree with Mr McGrail's account of that 11 meeting? 12 <b>A. Yes, I do.</b> 13 Q. You then send an update to the FCDO, 14 C4879. That is the reference that you were 15 referring to, "He was assured and confident". 16 <b>A. Yes.</b> 17 Q. And then the second paragraph: "I then 18 went to see the Chief Secretary, AG and CM. 19 whilst the AG and CM thought we should 20 look to accommodate the Commissioner to 21 some degree, the CM rejected all terms. The 22 Chief Secretary confirmed this in writing to 23 the Commissioner. With the AG's support, I 24 subsequently advised the CM to try and 25 accommodate the Commissioner in some</p> <p style="text-align: center;">Page 237</p>	<p>1 Q. Can we go to A98 now, please, 2 paragraphs 130 to 131? This is Mr McGrail's 3 third statement and he refers to exchanges - I 4 am sorry, 130 to 131. I am just trying to find 5 the date of this exchange. 8 June, I believe. 6 It's the same day, and at 11 past seven the 7 Chief Secretary writes to Mr McGrail, "I 8 shall revert on this soonest I can. Best 9 wishes" and then Mr McGrail writes to you, 10 "With all the uncertainty I am unable to sign 11 my letter to you. Government are merely 12 considering my pension and untaken leave. 13 They haven't committed to agreeing to it. It 14 is an awkward situation which I trust you 15 understand. I have to safeguard my terms 16 100 per cent, whatever they end up being but 17 certainly agree them before signing the letter. 18 Ian." And then you say: "Ian, thanks for this. 19 I'd be grateful, therefore, if you could see me 20 at nine tomorrow. Regards, Nick." "From 21 this message I deduced that NP was going to 22 invoke his powers under section 13. I was by 23 then in a very bad way emotionally. In fact, 24 my suspicions were confirmed when the CM 25 stated that these were NP's intentions in</p> <p style="text-align: center;">Page 239</p>
<p>1 way", and then, "The CM is now preferred to 2 offer X if it can be cleared with the auditor." 3 Why were you discussing the terms of Mr 4 McGrail's retirement with the Chief Minister 5 when your evidence is that you told Mr 6 McGrail that it was a matter for the Chief 7 Secretary? 8 <b>A. I think I went to see the Chief Secretary 9 first and it was perhaps at his suggestion, 10 although I can't be certain of this, that we 11 went from his office into the Chief Minister's 12 office. I seem to remember walking into the 13 Chief Minister's office with the Chief 14 Secretary.</b> 15 Q. Did the Chief Minister explain to you 16 why he was resisting the terms sought by Mr 17 McGrail? 18 <b>A. No, and naturally I am thinking again, on 19 the point of language and hindsight, "rejected 20 all terms", I think wasn't perhaps true. I think 21 it may have been some of the terms or the 22 degree or how far beyond what may be 23 statutory. It certainly wasn't an outright 24 rejection of everything, but there was some 25 resistance to certain elements of it.</b></p> <p style="text-align: center;">Page 238</p>	<p>1 Parliament when answering questions to 2 him." Why did you ask him to attend at 9 3 a.m. the following day? 4 <b>A. I think I was going to anyway, but I think 5 if my memory serves me, if we could perhaps 6 move up the screen a bit to 132 and 133, and 7 I think - sorry, I think what I'd done, and 8 perhaps again I was perhaps too short and 9 brief with Mr McGrail, but I spent the next 10 few minutes, if not a bit more in contact with 11 the Chief Secretary, which is why I say, "I 12 gather Darren will be in touch shortly". I 13 thought the issue was resolved and terms 14 agreed. I can see from Mr McGrail's 15 messaging with the Chief Secretary -</b> 16 Q. But why did you need to see him the next 17 morning? 18 <b>A. I think probably to talk through it and to 19 see whether he had any room for movement.</b> 20 Q. It wasn't to go down the section 13 route? 21 <b>A. I mean, I would have if he had not have 22 signed the letter, but I was quite confident 23 that he would confirm his wish to retire.</b> 24 Q. Just one last topic, Mr Pyle. I understand 25 that you were engaged by the Chief Secretary</p> <p style="text-align: center;">Page 240</p>

60 (Pages 237 to 240)

<p>1 as a consultant in relation to modernisation of 2 the Civil Service at some point, maybe in 3 2023? 4 <b>A. Yes, correct.</b> 5 Q. Can you just say what your precise role 6 is? 7 (16.15) 8 <b>A. It's exactly that. It's advising the Chief 9 Secretary on a reform programme in the Civil 10 Service. Expecting this question, and if you 11 will forgive me it will only take a short few 12 minutes to explain the background to that, 13 and it may head off further questions or not. 14 As a career diplomat, I was not retiring at the 15 end of my time in Gibraltar, which was 16 scheduled to end in September of '21. Sir 17 David arrived, and a few months later I was 18 applying for jobs overseas within the Foreign 19 Office. Overseas jobs are posted two or three 20 times a year in batches and stretch for twelve 21 months, it's called a boarding process. I 22 applied for three jobs, one of which was in 23 Pakistan, in September of '21, for which I got 24 an interview. I was not successful for that 25 interview, and then between then and the</b></p> <p style="text-align: center;">Page 241</p>	<p>1 <b>know the waters and the beaches, well, and I 2 said I might just stay here and see what 3 happens, and it developed from there with an 4 offer of helping the Government in Gibraltar 5 out, not least because in my time as Deputy 6 Governor and Governor I used to talk about 7 Gibraltar's strengths and how it punches 8 above its weight. In my opinion it could and 9 should be better, and one of the things it 10 needed in my experience was civil service 11 reform. So I sort of opened the door, or sort 12 of set myself up to be asked at a later date 13 whether I would be willing or interested in 14 helping the Government of Gibraltar with 15 their reform programme. We had a few 16 discussions around this; I approached the 17 Foreign Office, because I had to get 18 permission to take up any outside role. The 19 application was endorsed by the Governor, 20 who said it was a good appointment not only 21 for the Government of Gibraltar but for the 22 FCO, and permission came back to take up 23 the role. That was I think March '22, 24 twenty... yeah, March-April. I then took 25 some time off, and contracts were signed in</b></p> <p style="text-align: center;">Page 243</p>
<p>1 <b>next board I unfortunately had a medical 2 situation which took about seven months to 3 resolve, that grounded me (in Foreign Office 4 terms) because I would not get medical 5 clearance to go overseas. My successor, with 6 two or three weeks' notice, decided not to 7 come and replace me in the December of '21 8 so I agreed, having sent all of our possessions 9 (and our dog, actually) back home to the UK 10 expecting to return to the UK, I stayed until 11 June '22. In that time I also applied for a job 12 with the Commonwealth War Graves 13 Commission in the UK, because I was still 14 grounded by the Foreign Office, or I wouldn't 15 get medical clearance. I then reached a 16 moment where I thought: I don't really want 17 to go back to the UK. My wife was working 18 in Gibraltar, so I decided to stay. Stepping 19 back, I was first approached by the Attorney 20 General in October '21 on the back of 21 looking to leave and then to go overseas, and 22 what it w-- it was an open question: what was 23 I doing next? And I said: well, now I'm 24 grounded I don't really know. We have a 25 small apartment in Alcaidesa, which is why I</b></p> <p style="text-align: center;">Page 242</p>	<p>1 <b>January '23, and I started work in April '23.</b> 2 Q. And, are you still engaged by the 3 Government on that basis? 4 <b>A. Yes, I am.</b> 5 Q. Is there an end point to the engagement? 6 <b>A. It's a three-year contract.</b> 7 Q. Starting, you said, in early twenty- 8 twenty... 9 <b>A. April '23.</b> 10 Q. --three. Do you think that your current 11 role nevertheless allows you to give 12 independent evidence to the Inquiry? 13 <b>A. Yeah, I mean I would only give truthful -- 14 I've taken the oath to give -- to provide the 15 truth, the whole truth and nothing but the 16 truth, so again with respect I find that a 17 slightly odd suggestion.</b> 18 Q. What about the perception of such a role 19 being offered during the course of the 20 Inquiry? 21 <b>A. No, I can see -- I can see that optic. But I 22 think those that know me well enough, and 23 know my background and my integrity, 24 haven't really raised any concerns about that. 25 The Inquiry was delayed quite considerably</b></p> <p style="text-align: center;">Page 244</p>

61 (Pages 241 to 244)

1 **from when it was first envisaged, so... Yeah,**  
 2 **I don't think I have any more to say on that.**  
 3 MR SANTOS: Thank you, Mr Pyle. I do  
 4 not have any further questions. I note that  
 5 the time is twenty past four. I think it is Mr  
 6 Neish who is going next, but I suspect that he  
 7 is going to be more than ten minutes.  
 8 MR NEISH: Mr Chairman, given that it is  
 9 quite late, it is twenty past four, it might be  
 10 helpful for me to have a copy of the  
 11 transcript tonight. It might even shorten my  
 12 questions --  
 13 THE CHAIRMAN: Yes, well I think --  
 14 MR NEISH: -- because I do not want to  
 15 cover ground covered by the --  
 16 THE CHAIRMAN: Yes, that is fair enough;  
 17 I do not think twenty past four is a very good  
 18 time to start.  
 19 MR NEISH: Thank you.  
 20 MR SANTOS: Thank you.  
 21 THE CHAIRMAN: Okay, ten o'clock  
 22 tomorrow.  
 23 NICHOLAS PYLE (?): Absolutely.  
 24 THE CHAIRMAN: Thank you very much.  
 25 NICHOLAS PYLE (?): Thank you.

Page 245

1 (Adjourned until 10 am, Thursday, 9 May

2 2024)

3 (16.20)

Page 246

62 (Pages 245 to 246)

<b>A</b>	128:1 148:19	192:2	109:12	173:16 175:10
<b>a-half</b> 18:16	166:16 173:17	<b>accurately</b> 190:16	<b>Acts</b> 220:18	199:16
<b>a.m</b> 232:8 240:3	192:14 193:24	<b>accusations</b> 25:11	<b>actual</b> 15:20	<b>advising</b> 21:19
<b>A1054</b> 109:4	199:1 223:1	26:7,8,9,10	<b>add</b> 48:13 134:10	241:8
<b>A120</b> 21:5	245:23	230:12	235:12	<b>affairs</b> 68:12 92:23
<b>A1225</b> 61:1	<b>abusive</b> 42:19	<b>accused</b> 40:10	<b>added</b> 49:21 107:1	<b>affidavit</b> 1:14,15
<b>A1388</b> 43:11	43:22	<b>ache</b> 138:19	116:13	1:16,20,25 2:5
<b>A152</b> 16:19	<b>accept</b> 8:19 17:17	<b>achieve</b> 228:14	<b>adding</b> 38:12	12:3 21:4 50:19
<b>A199</b> 51:17	20:16 22:9 31:23	<b>achieved</b> 165:2	94:23	51:18 79:9 106:9
<b>A230</b> 106:7	44:1 45:24 47:10	<b>acknowledge</b>	<b>address</b> 20:22 61:5	107:15 200:15
<b>A240</b> 178:17	60:4 91:15 92:1	104:14 131:6	195:17 217:15,19	<b>afforded</b> 198:5
<b>A243</b> 216:8 223:9	97:22 98:11	<b>acknowledged</b>	218:6	<b>afraid</b> 81:24 84:7
<b>A245</b> 9:15	103:16 128:10	59:16	<b>addressed</b> 64:15	<b>Africa</b> 48:4
<b>A247</b> 30:9 39:17	141:11 148:23	<b>act</b> 3:16 8:7,22	131:5 229:14	<b>African</b> 77:9
<b>A248</b> 56:14	157:13 162:15	11:16 34:7,8,9,20	<b>adept</b> 138:22	<b>aftermath</b> 107:3
<b>A249</b> 44:21	184:10 188:24	45:13 60:17	<b>adequate</b> 182:21	119:21 153:20
<b>A250</b> 130:12	202:6 217:18	67:15 127:23	<b>Adjourned</b> 74:6	<b>afternoon</b> 116:15
<b>A251</b> 66:4 68:9	223:6 224:15	169:24 176:1,4	246:1	142:15,16 205:20
<b>A252</b> 76:8 90:4	226:5 234:2	179:5 193:1	<b>adjournment</b>	207:21 210:4
<b>A254</b> 100:16	<b>acceptance</b> 223:5	198:6 199:13,24	142:13 203:1	223:13 226:1
108:20	<b>accepted</b> 30:23	200:19 203:13,23	<b>Admiral</b> 22:5 24:3	<b>AG</b> 21:17 76:2
<b>A255</b> 151:25	94:10 96:11	209:16,20 212:4	<b>admire</b> 49:13,14	84:6 87:2 88:5,6
<b>A257</b> 200:14	117:23 155:16	215:4,6,11	<b>admired</b> 110:6	88:8,11,15,20,23
<b>A260</b> 133:13	222:3	<b>acted</b> 22:7	<b>adopted</b> 212:4	89:6 96:18
<b>A264</b> 87:25	<b>access</b> 12:1,7	<b>acting</b> 3:21 4:2,14	<b>advance</b> 114:22	157:20 160:17
<b>A329</b> 59:4,6	13:20	5:13,15,17 14:21	175:21 197:13	173:1 199:15,21
<b>A341</b> 46:15	<b>accessories</b> 204:25	15:10 19:8 21:17	210:23 227:22	200:6 201:20
<b>A43</b> 233:7,9	<b>accident</b> 70:16	22:17 23:1 24:24	229:3	208:20 220:19,20
<b>A801</b> 74:8	107:5	32:21 108:23	<b>advantage</b> 229:19	222:3 230:5
<b>A83</b> 107:13	<b>accommodate</b>	110:16	<b>adverse</b> 21:25	233:21,25 237:18
<b>A98</b> 239:1	237:20,25	<b>action</b> 15:20 33:1	48:14	237:19
<b>aback</b> 226:17	<b>accommodating</b>	33:2,15 113:23	<b>advert</b> 47:17	<b>AG's</b> 21:21 237:23
234:5	17:10	162:5,16 200:24	<b>advertised</b> 47:18	<b>agencies</b> 83:1
<b>abilities</b> 66:12	<b>accommodations</b>	207:23,25 210:5	<b>advice</b> 21:20 25:2	85:13
<b>ability</b> 86:5 189:6	138:24	210:25 211:3	88:17 127:8	<b>Agency</b> 4:3
<b>abject</b> 52:4,5,7,13	<b>accompany</b> 232:10	<b>actions</b> 15:14 26:5	157:20 158:6	<b>agenda</b> 44:12
<b>able</b> 25:3 41:9	<b>accompli</b> 189:19	29:8 30:17 31:17	160:17 161:2	<b>aggressive</b> 31:12
90:14 92:2	<b>accord</b> 17:3	38:4,13 39:12	169:13 172:7	<b>agree</b> 9:4 27:3
102:14 114:18	<b>account</b> 17:17	40:17 78:22	173:14 177:4	29:10 36:10 51:8
146:21 189:6	99:19 151:24	133:4 136:19	178:6 180:18,21	52:1 87:15
<b>absence</b> 3:17	158:19 178:16	164:2 217:14	180:22,24 190:25	101:17 106:23
<b>absent</b> 3:24	223:10 237:10	218:6 220:3	212:2 213:20,22	108:5 109:15
<b>absolute</b> 204:7	<b>accountability</b>	<b>activated</b> 117:2	214:1,2,16	148:10 169:16
<b>absolutely</b> 10:15	138:5,8 182:18	189:25	215:13,17 222:6	177:14 179:21
18:24 35:5 66:2	<b>accountable</b> 133:3	<b>active</b> 25:6 151:3	222:14	186:5 187:24
69:2,25 70:14	182:24	<b>activities</b> 25:16	<b>advised</b> 35:9 130:2	188:8,17 192:5
71:2 73:25 74:2	<b>accumulative</b>	<b>activity</b> 21:22	209:8,22 212:3,6	208:11 233:16
75:22 76:21 92:7	160:5	22:22 77:8 78:6	212:9 237:24	236:24 237:10
117:18 127:24	<b>accurate</b> 190:22	84:9 106:14,23	<b>adviser</b> 88:5,16	239:17

<p><b>agreed</b> 3:13 19:25 20:4 48:22 52:25 66:20 76:10 80:24 128:13 152:16 169:3 170:10 171:8 172:16 187:10 190:5 199:14 230:6,13 231:12 232:24 233:2 240:14 242:8</p> <p><b>agreeing</b> 143:14 232:22 239:13</p> <p><b>agreement</b> 33:9,16</p> <p><b>agrees</b> 173:3</p> <p><b>ahead</b> 14:22 142:21 201:22,24 204:12</p> <p><b>aircraft</b> 17:2</p> <p><b>aired</b> 135:19</p> <p><b>airfield</b> 10:4,23 14:12,18 17:1 34:4 41:10 55:2 60:11 137:17 155:13,25 219:25</p> <p><b>airport</b> 4:11 14:9 23:7 24:10 41:3 50:3 54:9,22 55:7 56:1 167:21</p> <p><b>AIS</b> 84:20 86:5 90:23 91:3 94:15 95:6 96:11 97:5 97:18 100:6,9,11 100:15 104:13 117:2</p> <p><b>Alan</b> 26:17,24 27:3</p> <p><b>albeit</b> 70:10</p> <p><b>Alcadesa</b> 148:2 149:25 150:4,9 151:19 242:25</p> <p><b>alert</b> 147:16 157:24 235:11</p> <p><b>allegations</b> 57:2 144:19 147:22 150:21 178:23 180:15 227:6 233:15 234:7</p> <p><b>alleged</b> 40:13 42:16 109:12</p>	<p>190:24 197:6</p> <p><b>alleges</b> 23:6 163:10</p> <p><b>alleging</b> 159:11</p> <p><b>allow</b> 60:18 86:19 137:23 177:16 184:21 192:25 208:4 210:6 223:20 225:21 228:14,19 230:23</p> <p><b>allowed</b> 60:12 183:3,9</p> <p><b>allowing</b> 17:16</p> <p><b>allows</b> 183:10 244:11</p> <p><b>allude</b> 76:7</p> <p><b>alluded</b> 3:19 45:15 83:24</p> <p><b>altercations</b> 24:22 25:5</p> <p><b>alternative</b> 174:9 205:5</p> <p><b>ambassador</b> 133:2</p> <p><b>ambassadors</b> 48:15</p> <p><b>amended</b> 196:1</p> <p><b>amendments</b> 171:1</p> <p><b>amounted</b> 130:17</p> <p><b>anchored</b> 84:24</p> <p><b>anecdotal</b> 11:6 45:3,10 46:1,6 95:9</p> <p><b>anger</b> 80:17,21 156:13,17,25 157:14</p> <p><b>angers</b> 80:19</p> <p><b>angle</b> 168:24</p> <p><b>angry</b> 80:12 165:13,15,17,19 232:13</p> <p><b>animal</b> 37:10</p> <p><b>annoyed</b> 156:12 156:24</p> <p><b>annoys</b> 80:19</p> <p><b>answer</b> 75:3 91:13 135:12 155:8 195:20 231:15</p> <p><b>answered</b> 124:15</p>	<p><b>answering</b> 92:15 125:4 240:1</p> <p><b>answers</b> 124:13</p> <p><b>Anthony</b> 22:5</p> <p><b>anybody</b> 18:24 35:14 60:24 88:22 146:4 157:10 172:2 182:12</p> <p><b>anyone's</b> 6:24</p> <p><b>anyway</b> 96:9 240:4</p> <p><b>apart</b> 5:11 69:22</p> <p><b>apartment</b> 242:25</p> <p><b>apologies</b> 26:3 71:25 167:25 211:6 231:3 233:8</p> <p><b>apologise</b> 13:3 15:17 20:16 52:6 52:13 82:8 97:11 124:1 185:15 189:10 227:1,4 228:7</p> <p><b>apologised</b> 19:22</p> <p><b>apology</b> 25:22 26:5 36:19</p> <p><b>apparent</b> 77:15 153:13</p> <p><b>apparently</b> 130:19 180:17</p> <p><b>appeal</b> 230:10</p> <p><b>appear</b> 9:19 11:21 24:2 101:18,21</p> <p><b>appeared</b> 26:20 147:7 182:20</p> <p><b>appears</b> 42:18 77:3 110:21 112:1 115:20 116:2 131:21 141:12 210:10</p> <p><b>appended</b> 12:6</p> <p><b>applicant</b> 47:9</p> <p><b>application</b> 47:7 48:22,24 54:15 55:3 204:7 236:25 243:19</p> <p><b>applications</b> 46:25 47:11 53:22</p> <p><b>applied</b> 241:22</p>	<p>242:11</p> <p><b>applies</b> 89:8 127:11</p> <p><b>apply</b> 229:13</p> <p><b>applying</b> 241:18</p> <p><b>appoint</b> 209:9</p> <p><b>appointed</b> 209:12</p> <p><b>appointment</b> 41:6 44:14 46:13,17 46:20 52:2 54:24 55:10 127:9 243:20</p> <p><b>Appointments</b> 19:12</p> <p><b>apportion</b> 131:11</p> <p><b>appreciate</b> 126:21</p> <p><b>approach</b> 17:11 24:20 148:12 164:7 169:4,17 170:10 171:9,10 180:1 189:13 218:12 221:23 229:25</p> <p><b>approached</b> 35:22 91:24 125:2 148:18 149:9 242:19 243:16</p> <p><b>approaching</b> 176:14</p> <p><b>appropriate</b> 7:4 7:16 23:19 24:12 48:19 73:21 126:24 183:1,15</p> <p><b>approval</b> 144:8</p> <p><b>approved</b> 220:15</p> <p><b>approximate</b> 108:17</p> <p><b>approximately</b> 74:17 86:5 102:9</p> <p><b>April</b> 129:15 130:6 133:22 134:24 139:1,3,9 145:24 150:20 244:1,9</p> <p><b>area</b> 17:5 219:23</p> <p><b>areas</b> 9:6 128:7 138:24 139:17 188:19</p> <p><b>argue</b> 19:4 86:21</p> <p><b>argument</b> 123:16</p>	<p>161:3</p> <p><b>arguments</b> 183:6</p> <p><b>arising</b> 126:17</p> <p><b>armed</b> 60:13</p> <p><b>arose</b> 66:9 149:16</p> <p><b>arrange</b> 139:5</p> <p><b>arranged</b> 142:24</p> <p><b>arrangement</b> 162:9</p> <p><b>arranging</b> 201:18</p> <p><b>arrest</b> 18:17 179:18</p> <p><b>arrested</b> 15:23 16:2,11,14 17:6 17:20,21,25 20:21</p> <p><b>arrests</b> 4:12 15:19 15:22 16:16 18:9 18:23 19:2,4 25:20 27:19</p> <p><b>arrival</b> 10:3 14:20 109:24 157:4 210:12 217:2,20 218:14,21 229:17 232:2</p> <p><b>arrivals</b> 17:13</p> <p><b>arrive</b> 23:5 109:25 190:9</p> <p><b>arrived</b> 2:10,22 75:14 110:9 113:25 209:6 211:14 217:1,21 228:16 230:25 231:13 241:17</p> <p><b>arrives</b> 67:16 211:9 218:8</p> <p><b>arriving</b> 164:21 211:21 218:17,19</p> <p><b>article</b> 44:10 147:7</p> <p><b>aside</b> 20:9 48:23 237:3</p> <p><b>asked</b> 26:21 36:7 50:16 56:7 61:4 66:19 68:17,25 71:21 75:1 82:23 89:23 90:7 91:14 93:12 94:20 154:5 170:17 186:21 192:15</p>
---	--	--	---	---



205:14 221:9 224:6,24 226:15 234:14 235:1 243:12 <b>asking</b> 32:7 43:9 79:20 88:25 107:17 114:10 136:20 148:2 221:19 231:3 235:25 236:6 <b>aspects</b> 55:15 147:24 197:25 212:24 <b>aspersions/alleg...</b> 145:1 <b>assault</b> 46:6 54:10 54:23 55:8 56:2 <b>assaulted</b> 41:22 <b>assertion</b> 50:22 <b>assist</b> 208:13 <b>assistance</b> 72:10 72:11 <b>Assistant</b> 62:1,9 127:4,5 204:21 <b>assume</b> 30:3 88:22 89:17 163:24 164:23 219:15,18 <b>assumed</b> 53:6 88:6 104:13 117:4 176:2 198:15 <b>assuming</b> 89:3 <b>assumption</b> 73:4 89:20 171:7 201:12 <b>assured</b> 237:15 <b>attach</b> 150:12 <b>attached</b> 112:4 204:23 209:20 <b>attachment</b> 207:10 <b>attack</b> 42:7 <b>attend</b> 5:16 6:22 7:21 193:18 240:2 <b>attendance</b> 7:1 61:12 <b>attended</b> 37:16 233:9 <b>attention</b> 21:13 143:20 145:12	232:4 <b>attitude</b> 41:4 <b>Attorney</b> 27:18 29:4 67:1,19 74:23 76:10,24 77:1,14,16 78:2 79:2 80:14 81:21 83:5 85:10 89:10 89:17 90:6,10 94:3 98:2,25 102:21 103:3,11 104:9 105:13,14 111:22 127:7,8 127:13 128:20 177:5 178:8 180:18 206:25 207:18 208:10 209:5,8,22 210:2 213:21,25 214:3 214:17,19 216:6 216:9 220:8 222:10 225:10,24 229:5 230:4,18 242:19 <b>attract</b> 48:2 <b>attracted</b> 21:25 <b>attribute</b> 40:12 <b>audiences</b> 30:4 <b>auditor</b> 238:2 <b>August</b> 2:11 109:10 <b>Australia</b> 48:4 <b>authoritarian</b> 61:8 <b>authorities</b> 72:11 107:7 117:21 <b>authority</b> 5:4 19:10 30:14 35:3 84:17 85:12 183:25 188:5 198:3,5,7,18 203:8,11,12,21 203:23 204:4 208:21 212:10,12 220:3 <b>Authority'</b> 183:14 <b>authority's</b> 199:10 <b>avail</b> 215:15 <b>available</b> 70:10 71:19 100:21	116:25 118:16 179:4 183:2 215:15 216:2 221:17 <b>avoid</b> 189:1 <b>awaiting</b> 109:23 129:22 <b>awake</b> 149:2 174:4 174:5 185:5 <b>aware</b> 15:8 47:15 47:23 70:21 71:17 113:10 128:19 129:13 144:7 150:13,23 176:15 207:1 209:5 214:18 219:4 226:15,17 <b>awkward</b> 239:14 <hr/> <b>B</b> <b>b</b> 121:12 124:17 125:14 <b>B1</b> 5:21 <b>B100</b> 105:16 <b>B1273</b> 116:17 <b>B1345</b> 76:22 <b>B1351</b> 102:2 <b>B1436</b> 71:23 <b>B1439</b> 146:25 <b>B1440</b> 166:3 <b>B1441</b> 120:22 172:3 174:11 <b>B1445</b> 201:16 <b>B1746</b> 73:5 <b>B1748</b> 81:25 <b>B1761</b> 103:23 <b>B1780</b> 181:3 <b>B1934</b> 111:20 115:11 <b>B2157</b> 37:19 <b>B2789</b> 75:6 <b>B5735</b> 67:13 <b>B5736</b> 97:23 <b>B85</b> 64:19 75:23 86:23 <b>back</b> 23:17 29:20 32:23 33:3 36:4 41:2 44:21 50:18 55:7 58:12 59:5 68:9 84:24 86:23	93:11 94:13 99:12 124:10,15 128:3 132:7 135:21 144:17 151:10,18 156:5 159:3 163:7,25 165:20 170:1,15 174:11 182:14,15 184:15,22 185:25 187:11 203:5 205:1 221:25 227:9 230:10 232:2 236:20 242:9,17,19,20 243:22 <b>background</b> 19:7 55:14,25 161:9 164:24 241:12 244:23 <b>backwards</b> 86:16 <b>bad</b> 45:3,16 107:10 140:1 141:10 239:23 <b>badly</b> 167:8 236:16 <b>baggage</b> 17:5,23 <b>Baglietto</b> 176:17 <b>balance</b> 121:16 122:8 169:4 170:11 179:23 230:6 <b>ball</b> 200:3 <b>bar</b> 41:22 <b>Barbara</b> 74:18 113:1 <b>bars</b> 45:20 <b>Barton</b> 217:24 <b>base</b> 6:10 155:20 <b>based</b> 84:23 99:15 173:16 <b>baseline</b> 120:6 <b>basically</b> 172:23 237:3 <b>basis</b> 33:14 88:9 99:14 100:19 101:7 121:11 123:10,20 128:5 172:24 176:13 211:11 244:3	<b>bat</b> 147:23 <b>batches</b> 241:20 <b>beach</b> 113:1 <b>beaches</b> 243:1 <b>bear</b> 41:16 <b>bearing</b> 202:11 <b>beer</b> 80:7 <b>began</b> 10:3 <b>beginning</b> 36:12 138:13,16 152:24 165:23 230:13 <b>behalf</b> 123:14 134:2 225:7 <b>behave</b> 130:21 <b>behaved</b> 25:12 <b>behavior</b> 40:21 <b>behaviour</b> 14:16 55:16 <b>behaviours</b> 23:18 30:12,17,23 31:7 31:7 45:4 57:11 64:16 130:16 133:11 136:19 155:11 <b>belief</b> 1:21 2:6 35:6 42:4,8 149:22,22 154:8 157:16 <b>believe</b> 8:1 12:10 20:23 26:25 38:22 41:25 44:6 45:24 80:4 84:18 93:5 98:24 113:6 123:5 131:17 135:21 137:7 139:4 140:2 161:21 162:10 169:17 175:5 179:15 191:7 194:1 206:5 213:2,2 226:18 239:5 <b>believed</b> 36:5 64:4 75:9 136:22 137:20 154:20 203:24 <b>believes</b> 181:5 <b>beneficial</b> 161:18 <b>benefit</b> 25:1 73:24
---	---	---	---	--

97:8	<b>bits</b> 193:1	19:13 65:20	<b>broad</b> 48:6 181:19	<b>C4715</b> 204:14
<b>best</b> 1:20 2:5 6:15	<b>bizarrely</b> 166:10	74:21 109:7	235:9	<b>C4725</b> 208:14
14:7 28:22 48:10	<b>black</b> 13:24	115:1	<b>broadcast</b> 47:17	<b>C4727</b> 207:16
71:19 73:16	<b>blame</b> 25:25	<b>briefing</b> 72:4	<b>brought</b> 28:5	<b>C4771</b> 217:4
105:25 107:10	131:11	73:10,17 96:19	108:14 150:9	<b>C4782</b> 220:7
140:21 143:1	<b>Bland</b> 161:24	99:16,19,22	162:16 206:12	<b>C4796</b> 214:1
148:8 154:20	<b>blind</b> 45:8	109:16 111:11	<b>brushed</b> 97:1,13	<b>C4815</b> 227:16
167:15 172:7	<b>blockaded</b> 15:9	<b>briefly</b> 10:20	<b>bullet</b> 98:4 110:14	<b>C4825</b> 228:11
173:2 192:6	<b>blocking</b> 15:21	12:14 154:10	110:18 114:6	<b>C4837</b> 228:25
209:19 235:4	28:20	203:7	179:10 181:4	<b>C4860</b> 225:16
236:14,15 239:8	<b>blue</b> 51:21	<b>briefs</b> 81:9	182:11 191:24	<b>C4879</b> 237:14
<b>better</b> 25:3 86:19	<b>bluntly</b> 51:11	<b>brilliantly</b> 219:20	<b>bullying</b> 57:2	<b>C6560</b> 129:10
92:3 102:17	<b>board</b> 26:12 61:5	<b>bring</b> 7:15 78:25	59:24 61:15,20	<b>C6565</b> 143:7
112:18 135:18	61:12 62:13,17	80:5 103:8 124:8	62:17 131:1,2,8	<b>C6729</b> 138:18
145:15 169:20	65:1 242:1	146:15 167:16	131:23 137:18	<b>Cabo</b> 67:5
243:9	<b>boarded</b> 17:1	172:13 174:12	144:20 147:22	<b>call</b> 12:11 14:18
<b>beyond</b> 26:19	<b>boarding</b> 241:21	211:23 224:13	150:21 178:23	19:1,15,23 32:25
35:10 41:5 85:2	<b>boat</b> 78:23 112:17	<b>brings</b> 153:25	180:15	41:11 55:24
104:15 113:12	138:11 206:10	<b>British</b> 16:2,12	<b>bullying'</b> 130:18	66:19 107:18,19
120:5 151:13	207:10	24:11,21 25:11	<b>bundle</b> 1:12 11:20	108:7,11 110:10
188:19 200:8	<b>boat's</b> 155:9	92:11 98:21	<b>business</b> 162:13	152:1,5 179:5
231:25 232:1	<b>boats</b> 64:24	106:16	<b>busy</b> 143:19	183:1,4 194:5
233:4 238:22	<b>body</b> 38:17 56:20	<b>Britto</b> 5:7 7:5,24	<b>bypassing</b> 206:16	200:19 203:17
<b>BFG</b> 84:16	<b>book</b> 13:24	60:8 61:4,17		215:12 229:5,7
<b>BGTW</b> 4:4 68:19	<b>border</b> 106:14	63:5,8,22 64:3	<b>C</b>	<b>called</b> 11:5 22:25
73:15 75:3 77:12	<b>bored</b> 78:5	119:13 120:20	<b>C</b> 191:2	34:1 65:20 67:5
95:17 102:9,16	<b>borne</b> 64:10	124:19,21,25	<b>C207</b> 27:15	84:9 125:2
102:18 103:1	<b>bothered</b> 223:2	129:18 134:16	<b>C260</b> 23:25 24:6	158:17 209:1
104:4,24 105:24	<b>bothering</b> 143:17	136:2,7,11,13	<b>C291</b> 26:13	241:21
108:2,5 110:20	<b>bottle</b> 80:7	137:1,10 139:2	<b>C316</b> 33:23	<b>calls</b> 86:14 199:19
111:15 117:5	<b>bottom</b> 21:7 24:5	141:19,25 143:9	<b>C3278</b> 96:16	200:4
119:25 120:4,7	26:14 37:20 59:7	149:19 164:8	<b>C3294</b> 101:12	<b>calm</b> 80:18
147:19 155:4	74:12 76:23	169:12 170:25	<b>C3343</b> 134:19	<b>camera</b> 84:21
<b>BGTW'</b> 109:2	99:25 105:17	171:6,23 172:13	<b>C3344</b> 139:8	<b>can(sic)</b> 35:4
<b>bias</b> 212:12	140:6 204:17,20	174:12 175:2,6	<b>C3420</b> 142:17	<b>Canada</b> 48:5
<b>biased</b> 209:15	204:22 229:1	175:11,13,21	<b>C3900</b> 113:19	<b>candidate</b> 19:23
<b>big</b> 168:3,4	<b>box</b> 116:12,15	176:11 178:15	<b>C3911</b> 172:20	48:17 51:8,12,13
<b>bit</b> 6:9 12:25 13:8	<b>boxes</b> 126:3	179:8,13 182:16	<b>C3937</b> 175:1,12	<b>candidate'</b> 50:24
19:7 20:8 24:17	<b>bravado</b> 27:24	183:18 184:11	<b>C3988</b> 190:12	<b>candidates</b> 47:16
31:12 34:14 53:9	<b>break</b> 73:22,23	185:14,16 186:5	<b>C4117</b> 126:14	48:2,18 51:3
58:19 60:19	142:6 202:17,21	186:23 189:19	<b>C4230</b> 110:12	54:18
78:14,21 85:18	<b>breaking</b> 123:9	190:4 191:10	<b>C4234</b> 180:8	<b>capabilities</b> 39:18
117:24 125:4	<b>brewing</b> 211:7	192:5,20,25	<b>C4282</b> 195:23	<b>capable</b> 110:8
130:8 132:20	<b>bridge</b> 3:4	193:2 194:6,8	<b>C4283</b> 196:1	<b>car</b> 19:16
143:12 147:1	<b>brief</b> 4:20 7:14	213:8,13 216:15	<b>C4315</b> 197:22	<b>cards</b> 100:12
148:25 152:10	67:14 87:11	218:23 224:19	<b>C4359</b> 168:18	<b>care</b> 217:15
175:8 179:10	109:20 156:15	<b>Britto's</b> 59:7 60:4	<b>C4652</b> 199:4	<b>career</b> 164:24
191:24 208:8	240:9	63:4 179:20	<b>C4675</b> 118:19	165:2 170:8
213:11 240:6,10	<b>briefed</b> 4:16,18	185:8 186:18	<b>C4676</b> 10:8	241:14
			<b>C4677</b> 144:11	

<p><b>careful</b> 47:14 139:15 170:16</p> <p><b>carefully</b> 48:9 53:18 64:16 163:22 165:5 166:9 211:18 219:20</p> <p><b>Caribbean</b> 48:5</p> <p><b>carried</b> 177:23</p> <p><b>carry</b> 201:10</p> <p><b>carrying</b> 3:2</p> <p><b>Caruana</b> 11:19</p> <p><b>case</b> 24:16 35:14 94:2 98:20 99:2 147:18 188:18 189:4 195:17 196:25 197:8 215:14</p> <p><b>Casemates</b> 61:10</p> <p><b>cases</b> 130:17 196:25</p> <p><b>casting</b> 144:25</p> <p><b>catch</b> 13:9 166:7</p> <p><b>categorically</b> 75:15 154:1</p> <p><b>categorise</b> 46:5</p> <p><b>category</b> 46:7</p> <p><b>cathartic</b> 165:22</p> <p><b>cause</b> 106:18 137:19 147:11 154:13</p> <p><b>caused</b> 5:18 10:5 11:8 15:3 17:7 18:13 22:1 66:13 93:4 100:18 132:17 154:12 156:3 192:12 222:13</p> <p><b>causing</b> 51:24 57:12,13</p> <p><b>caveat</b> 80:16</p> <p><b>CBF</b> 18:3 20:25 31:11 42:13,22 43:13</p> <p><b>CBF's</b> 42:18,25</p> <p><b>CCTV</b> 42:1</p> <p><b>censure</b> 38:15</p> <p><b>cent</b> 221:23 239:16</p> <p><b>central</b> 40:18</p>	<p>84:25 156:20 159:23 160:2</p> <p><b>Centre</b> 96:25</p> <p><b>certain</b> 36:6 38:14 47:19 55:15 77:12 81:7,7 98:10,11 192:15 195:7 197:25 199:21 200:6 213:5 233:15 237:1 238:10,25</p> <p><b>certainly</b> 18:4 22:18 36:19 86:17 89:24 115:1 119:13 126:1 132:8 136:21 149:21 153:23 158:16 187:3,17 211:9 218:22 238:23 239:17</p> <p><b>certainty</b> 68:8 90:14 146:24</p> <p><b>Ceuta</b> 72:7 147:8</p> <p><b>chain</b> 42:23 66:10 205:1,24 208:15</p> <p><b>chair</b> 6:13 7:11 48:6 49:23 50:11 51:15 129:17 140:22 189:8 199:6,16 208:2 208:25 209:3 225:23</p> <p><b>chairman</b> 6:9 12:25 13:4,8,12 18:6 34:3 37:10 37:12 43:2 49:20 52:14 54:21,25 55:6,22 56:10 57:5 73:23 74:1 74:3 75:18 83:11 83:17 91:9 95:25 96:5,8,14 107:8 119:13,18 135:7 135:11,12 142:8 142:10 176:2 186:12 196:9 202:20 225:4 245:8,13,16,21</p>	<p>245:24</p> <p><b>challenge</b> 212:11 212:15 229:23</p> <p><b>challenged</b> 185:6 228:8</p> <p><b>challenges</b> 4:1 140:17</p> <p><b>challenging</b> 48:9 165:3</p> <p><b>chance</b> 135:14 197:20</p> <p><b>change</b> 66:9 84:14 137:7 138:16 154:9 167:14,16 230:18,21 234:20 235:5</p> <p><b>changing</b> 66:7</p> <p><b>characterisation</b> 49:7 148:23</p> <p><b>charge</b> 162:16 177:18</p> <p><b>charges</b> 42:1 109:12</p> <p><b>Charles</b> 225:7,12</p> <p><b>chase</b> 71:9 75:1 78:17 83:9 96:25 97:7 98:21 99:5 138:1 155:21 206:4</p> <p><b>chasing</b> 82:19</p> <p><b>chat</b> 107:22 135:2 136:5 172:23</p> <p><b>chatting</b> 136:8</p> <p><b>check</b> 1:15 2:1 20:2 114:3</p> <p><b>checked</b> 201:21</p> <p><b>checking</b> 169:19</p> <p><b>cheek</b> 41:23 114:5</p> <p><b>chest</b> 156:10 157:9 159:4 165:22</p> <p><b>chief</b> 3:15 7:9 8:15 8:23 9:1,5 16:2 19:19,24 20:4,9 20:15,25 22:5 23:2 26:16,16 27:16 29:1,10 30:2,5,15,24 37:24 46:21 51:18 53:23 54:2</p>	<p>63:6 77:2 83:23 84:6 93:1 106:1 106:4,23 109:10 111:21 115:13 118:10 120:3 121:2,20,22 122:17 123:24 126:9,15 127:11 127:15,21 128:2 128:4,9,19 129:6 129:24 133:21 137:10 138:14 139:9 140:22 142:3 143:11 144:8 146:22 147:5 148:12,18 148:20 149:13 150:7,10,11 152:2 154:5 156:14 157:10,15 157:21,24 158:8 158:9,14 159:5,8 160:8,18 161:8 161:11 162:2,7 162:19,22,24 163:8,9,14 164:1 164:9,20 165:13 165:14 166:5,25 167:4 169:8,15 170:2,9 171:4,11 171:19 172:1,5 172:24 173:21,24 176:11,16,20 177:3,6 178:2,15 178:19,25 179:7 179:25 180:3,20 181:23,25 182:17 184:19 186:3,10 187:1,10 189:2,5 189:11 190:13 191:3,16,22 192:13,18 193:15 194:6,19,20 195:9,25 196:3 196:21 197:25 200:23 201:17,19 204:15,17,23 205:2 207:11 208:2 212:7</p>	<p>213:7 214:4,11 216:5,9,23 218:16 219:21 220:9,11 223:5,7 225:9,24 229:4 230:4,17 231:14 232:18 237:18,22 238:4,6,8,11,13 238:13,15 239:7 240:11,15,25 241:8</p> <p><b>Chipolina</b> 67:3 68:5 74:14</p> <p><b>chosen</b> 209:10</p> <p><b>Chris</b> 16:6 25:22</p> <p><b>chronological</b> 194:16</p> <p><b>circles</b> 42:5,9</p> <p><b>circulate</b> 230:13</p> <p><b>circumstances</b> 89:8 164:5 215:14 217:14 218:5</p> <p><b>civil</b> 74:16 104:19 117:12,20 118:5 118:9 147:7 150:8 241:2,9 243:10</p> <p><b>Civil-criminal</b> 153:24</p> <p><b>civilian</b> 16:9,23 17:1</p> <p><b>claim</b> 121:11 123:11,14,18,20 126:12 147:8 150:8</p> <p><b>claimed</b> 17:8</p> <p><b>claims</b> 16:21 42:21 124:6 125:17 126:17 127:10 146:13,18,19 147:12 148:2,6 149:25 150:4,9 151:19 152:22 153:4,6,10,15,25</p> <p><b>clarify</b> 36:7 67:25 72:14,24</p> <p><b>clarifying</b> 92:4</p> <p><b>clarity</b> 76:12 93:5</p>
---	--	---	--	---

108:10,11 149:5 165:24 230:20 <b>clarity's</b> 43:16 <b>clear</b> 15:18 27:21 64:9 68:6 86:1 113:24 118:3 120:1 169:15 171:16,22 178:10 185:16 187:1,2 200:13 218:25 221:18 232:19 <b>clearance</b> 242:5,15 <b>cleared</b> 89:25 190:15 232:18 238:2 <b>clearer</b> 102:6 <b>clearly</b> 23:3 24:22 26:2 30:5 47:22 48:3 49:6 62:17 62:18 65:3 91:18 92:10 147:24 156:8 157:1 <b>client</b> 88:15 <b>close</b> 15:4 67:7,22 82:22 156:13,17 156:24 157:14 186:1 237:7 <b>closed</b> 114:5 185:2 <b>closely</b> 3:10 170:4 <b>closer</b> 6:10 <b>closest</b> 197:5 <b>clowns</b> 28:12 <b>CM</b> 34:17 111:23 113:23 140:13 143:3,17 169:1 173:3 175:15 180:12 199:14 205:3 220:19,22 230:5 233:20,25 237:18,19,21,24 238:1 239:24 <b>CM's</b> 34:2 114:6 <b>CMNI</b> 209:12 <b>co-</b> 74:14,18,24 <b>co-operation</b> 117:19 <b>co-ordinates</b> 118:3 118:8 <b>coast</b> 79:4 92:6	<b>coastal</b> 85:12 <b>coffee</b> 63:6 172:17 <b>coincidence</b> 152:14,18 164:14 <b>coincidental</b> 164:17 <b>coincidentally</b> 22:6 <b>coincides</b> 229:16 <b>colleague</b> 210:18 <b>colleagues</b> 83:8 85:8 129:21 193:23 <b>collected</b> 42:3 <b>collection</b> 17:5 <b>collective</b> 140:5 160:21 161:5 181:18 222:18 <b>collectively</b> 140:15 146:11 <b>collegiate</b> 7:18 <b>collegiately</b> 3:10 <b>Collins</b> 16:6 17:3 17:11,13 18:2 25:22 <b>collision</b> 64:25 69:16,24 71:8 72:14,18,24,25 73:2 86:16 88:9 91:7 92:4 98:5 98:17 102:7,12 105:24 108:2,4 108:17 111:24 112:6,13,25 115:25 117:4 178:22 180:14 206:1 <b>collusion</b> 164:18 <b>Colonel</b> 16:3,11 23:4 31:9 <b>colonial</b> 170:6 <b>coloured</b> 41:4 <b>combines</b> 165:19 <b>come</b> 26:9 28:25 38:3 41:5 58:18 59:1,5 64:12 67:12 71:11,13 78:19,22 80:20 85:7 87:22 91:3	99:11 118:23 123:6 124:14,20 133:22 136:19,23 144:12 145:21 150:19 151:8,10 173:12 174:16,24 183:14,25 185:19 185:24 187:11 190:7 204:11 227:13 242:7 <b>comes</b> 28:21 33:3 121:13 124:18 157:12 204:3 <b>comforted</b> 200:25 <b>coming</b> 48:1 77:25 90:15 152:23 164:15 189:3 226:8 231:16 <b>command</b> 24:7 42:24 59:10 60:2 61:8 117:1 <b>Commander</b> 16:4 16:4,12,14 25:23 109:9 <b>commence</b> 176:15 <b>commenced</b> 47:10 61:13 <b>commendable</b> 38:8 <b>comment</b> 32:18 42:14,23 47:16 49:19 78:2,15 82:6,11,24 88:10 124:11 133:20 143:2 144:5 184:15 202:10 236:1 <b>commented</b> 46:24 <b>comments</b> 194:24 208:6 236:23 <b>commercial</b> 16:9 16:23 <b>Commission</b> 19:11 19:12 242:13 <b>commissioner</b> 14:17 15:10 20:25 23:2 26:23 27:17 29:4 37:14 44:15 46:18 47:1	55:4 59:20 61:15 61:20,25 62:1,9,9 66:12 72:3 73:9 76:25 96:20 98:3 102:20,23,24 103:10,21 115:13 115:21 116:4 124:24 126:20 127:5,6 131:6 133:8 134:2 140:13,24 146:6 156:2 163:11 167:20 172:25 174:18 177:16,21 179:2,6 180:17 181:5 182:23 183:4,9 186:14 191:5,7 198:3,21 199:8 200:20 203:18 204:21 205:12 207:22 208:7,23 209:2 209:11,18 210:9 215:13 220:13,17 221:13,20 229:13 229:21 231:20 237:20,23,25 <b>Commissioner's</b> 75:10 99:8 208:6 210:7 229:6,7,12 229:18 <b>commitment</b> 140:18 221:5,6 <b>committed</b> 45:9 239:13 <b>Commodore</b> 16:13 <b>common</b> 182:19 <b>commonly</b> 3:21 4:23 <b>commonwealth</b> 30:16 47:20 83:12 242:12 <b>communicate</b> 27:12 192:7 <b>communicated</b> 196:2,20 <b>communication</b> 152:9 161:23 <b>communications</b>	12:5 52:8 71:7 79:19 179:16 232:14 236:8 <b>community</b> 182:7 <b>companies</b> 161:15 <b>company</b> 161:18 <b>comparison</b> 132:8 <b>competence</b> 169:2 169:9 188:20 <b>competencies</b> 53:2 <b>complain</b> 35:16 58:10 60:24 <b>complained</b> 58:9 <b>complaint</b> 26:11 59:13,18,20,24 60:7 61:14,19 62:25 <b>complaints</b> 26:11 56:24 57:19,22 58:3,22 59:15 61:25 63:19 212:7,14,18 <b>complete</b> 210:19 <b>completed</b> 100:5 236:17 <b>completely</b> 37:8 43:5 188:15 <b>complex</b> 165:3 <b>complexities</b> 109:11 <b>complications</b> 82:15 <b>computer</b> 40:6,9 40:14 <b>concern</b> 11:8 57:9 57:13 68:14 69:11 87:18 120:14 127:12 132:2 146:14 148:16 178:20 180:13 <b>concerned</b> 110:25 120:13 131:22 144:22 145:10 151:20 165:11 197:1 <b>concerning</b> 8:16 74:24 <b>concerns</b> 7:15
---	--	--	---	--

10:14,17,21 11:2 11:12 14:14 27:12 30:11 31:5 31:20 39:4 44:4 50:22 52:17 54:8 54:11,21 55:14 55:25 119:3,6,7 131:7 133:16,24 134:11 136:11 147:15 148:13 149:8 152:15 154:6,10 156:15 159:20 167:18 168:3,4 194:25 197:23 205:8 233:20,22,25 235:9,12 244:24 <b>concerns'</b> 66:7 <b>concert</b> 21:21 <b>conclude</b> 95:18 211:19,22 218:10 230:15 <b>concluded</b> 34:16 130:25 183:12 184:2,4 212:25 216:1 <b>concluding</b> 66:25 218:8 <b>conclusion</b> 38:4 86:20 93:20 130:7 189:7 211:24 216:3 <b>conclusions</b> 39:4 <b>conclusive</b> 42:4 <b>conditions</b> 228:22 231:8,11 236:11 <b>conducive</b> 29:15 <b>conduct</b> 8:16 18:22 30:25 31:3 62:5 199:20 200:5,8 203:24 <b>conducted</b> 39:20 200:12 <b>conference</b> 32:11 <b>confidence</b> 9:21,23 10:6 11:10,13 23:11,12,16 51:25 55:12 57:14 66:11,14	122:25 124:24 132:18 137:2,13 137:16 148:7 153:5 156:4 159:17,24 160:2 160:4 164:10 168:2,5 176:21 177:20 179:1 184:21 186:13 189:13 191:17 192:13 198:2 223:6,8 225:1 <b>confident</b> 235:21 235:21 237:15 240:22 <b>confidential</b> 202:12 <b>confirm</b> 1:19 2:4 4:10 11:25 36:20 85:15 102:15 104:11 205:12 227:23 240:23 <b>confirmation</b> 117:8,16 143:10 207:4 226:20 228:12 <b>confirmed</b> 10:18 70:10,19 92:24 101:10,24 112:1 115:20 116:2 167:2 175:16 233:4 237:22 239:24 <b>confirms</b> 111:9 <b>conflating</b> 63:17 97:11 <b>conflict</b> 222:4,8,13 <b>conflicted</b> 174:3 <b>confusion</b> 14:13 24:11 110:21 <b>connected</b> 181:23 <b>connection</b> 16:6 161:9,12 182:2 <b>conscience</b> 200:13 <b>conscious</b> 67:7 114:3 185:3 <b>consequence</b> 65:5 153:6 186:10 <b>consequences</b>	123:18 <b>consequently</b> 62:4 131:4 <b>consider</b> 15:13 38:16 50:8 70:25 72:16 89:7 101:3 126:23 127:21 163:18 166:23 177:22,23 178:6 179:3 183:2,23 186:8,8 187:16 190:16 191:8 192:18 199:11 208:5,22 210:6 212:19 213:6 215:4 216:12 219:9 221:7 227:6 <b>considerable</b> 15:3 <b>considerably</b> 244:25 <b>considerations</b> 163:1 <b>considered</b> 38:7 53:18 70:12 128:12 142:2 163:21,24 193:13 212:17 213:19 215:18 <b>considering</b> 148:14 168:8 239:12 <b>considers</b> 212:12 <b>consistent</b> 112:25 143:5 166:14 173:6 198:9 224:19 <b>consolidated</b> 52:25 <b>conspiracy</b> 15:25 164:18 <b>consternation</b> 15:3 <b>constitute</b> 62:6 215:25 <b>constituted</b> 212:10 212:13 <b>constitution</b> 3:22 4:23 8:6,12 28:8 28:9 66:1 88:18 169:24 219:5,19	<b>constitutional</b> 3:3 15:4 171:18 201:4 <b>constructive</b> 177:18 186:1 <b>consult</b> 214:11 <b>consultant</b> 241:1 <b>consultative</b> 114:25 <b>consulted</b> 128:20 128:25 129:2 202:8 <b>consulting</b> 9:10 <b>contact</b> 7:24 22:14 22:20 26:15 67:8 67:9 103:24 109:8,14,19 143:22 172:21 173:14 193:22 240:10 <b>contacts</b> 74:15 <b>contained</b> 225:2 <b>containing</b> 199:3 234:1 <b>content</b> 30:3 170:8 <b>contents</b> 1:19 2:4 37:22 114:20 <b>context</b> 33:6,7 59:25 69:19 98:13 201:7 <b>contingency</b> 173:10,20 174:16 175:2 <b>continue</b> 6:22 76:15 146:5 <b>Continued</b> 203:3,4 <b>continues</b> 77:10 <b>continuing</b> 148:1 149:25 174:1 <b>contract</b> 161:20 244:6 <b>contracts</b> 243:25 <b>contradiction</b> 94:9 <b>contrary</b> 117:3 <b>contributed</b> 45:14 213:9,14 <b>contributing</b> 23:10 <b>contributory</b> 21:23	<b>contrition</b> 28:7 <b>control</b> 154:17 <b>control/leadership</b> 60:20 <b>controversial</b> 217:3 <b>Convenor</b> 62:15 <b>convent</b> 20:24 23:1 83:19 109:21 110:5 175:15 178:16 180:11 199:18 205:12 222:11 233:10 <b>conversation</b> 20:8 34:11 35:25 143:25 144:4 163:9 204:1 233:12 <b>conversations</b> 20:11 <b>conversely</b> 29:5 <b>convey</b> 141:20 <b>conveyed</b> 88:14,15 88:20,21,23 <b>cooperate</b> 25:3 <b>cooperating</b> 101:18 <b>cooperation</b> 35:7 77:6,8 106:13 107:3,6 <b>coordinated</b> 202:7 <b>coordinates</b> 70:9 70:11,25 75:2 98:5,14 102:12 103:15 104:5,11 104:22 112:1,5 112:24 117:7,10 117:11,14 <b>CoP</b> 10:18 12:5 74:20,21 97:1 120:1,10 121:8 144:24 145:5 166:8,13 169:6 228:12,14,17 230:7,23 231:1 <b>COP's</b> 10:14 112:2 119:22 <b>copied</b> 105:5
--	---	---	---	--

111:22 <b>copies</b> 75:4,11 100:22 225:11,15 226:3 <b>copy</b> 5:24 9:19 12:11 75:11,20 190:20 195:2 214:4 225:3,22 226:9,22 234:9 245:10 <b>correct</b> 2:11,12,15 2:16 3:24 4:6,7,9 4:15 5:1,2 7:20 7:23 8:4,5,13,20 27:1,2 41:1 42:9 43:25 51:1 63:9 72:13,18,19 75:22 81:24 89:17 96:14 101:23 113:2,3 131:24,25 133:10 139:25 151:6,7 153:16 156:7 179:24 188:6 193:20 221:4 222:1 234:10 241:4 <b>corrected</b> 181:18 220:5 228:8 <b>correction</b> 96:7 <b>correctly</b> 42:6 174:23 180:2 183:20 <b>correspondence</b> 6:21 214:5 <b>corresponding</b> 168:22 <b>corruption</b> 144:22 145:1,3,11,18 <b>counsel</b> 21:15 127:9 <b>counterparts</b> 106:21 <b>couple</b> 24:4 39:24 70:3 144:12 165:14 195:9 222:10 <b>course</b> 9:8 16:1 20:19 33:2,15	37:9 45:20 53:12 60:21,22 65:8 86:12 99:22 101:20 113:15 114:23 136:16 141:15 161:11 165:8 181:22 190:19 199:11 200:24,25 207:23 210:25 218:9 226:17 235:23 244:19 <b>courses</b> 33:1 <b>court</b> 209:15 <b>courtesy</b> 17:14 <b>courts</b> 123:19 <b>cover</b> 245:15 <b>covered</b> 194:25 245:15 <b>covering</b> 203:6 <b>Covid</b> 23:23 121:24 <b>crack</b> 184:18 <b>cracking</b> 217:13 218:5 <b>craft</b> 27:10 87:20 <b>crafted</b> 219:20 <b>create</b> 220:21 221:2 <b>credibility</b> 3:17 140:19 <b>credible</b> 45:12 46:12 54:18 <b>crept</b> 218:13 <b>crew</b> 41:22 65:2 <b>crime</b> 42:6 <b>crimes</b> 45:9 <b>criminal</b> 62:5 109:12 157:22 <b>critical</b> 64:24 119:23 <b>criticism</b> 22:10 132:13 <b>cross</b> 30:19 31:14 106:13 <b>crossed</b> 162:20 <b>crossing</b> 169:25 <b>Crown</b> 21:15 201:5	<b>crucial</b> 120:10 <b>crystal</b> 200:3 <b>Culligan</b> 109:15 110:5,9 111:7 <b>Culligan's</b> 110:1 <b>culminated</b> 56:24 58:2 <b>culture</b> 140:3 154:18 <b>cumulative</b> 172:23 <b>current</b> 22:4 170:3 215:1,5,23 244:10 <b>curveball</b> 81:15 <b>custodial</b> 40:11 <b>cut</b> 59:5 187:21 <hr/> <b>D</b> <hr/> <b>daily</b> 121:23 149:14 <b>damage</b> 124:12 154:14 <b>Damages</b> 147:12 <b>damning</b> 139:15 141:3,6 178:21 180:13 <b>danger</b> 162:2 <b>dangerous</b> 122:2 <b>Darren</b> 143:20,21 240:12 <b>date</b> 110:22 129:14 218:21 229:24 239:5 243:12 <b>dated</b> 6:13 24:3 50:23 57:5 100:22,24 101:6 112:3 139:1 225:4,6,22,25 <b>dates</b> 227:3 <b>David</b> 2:15 22:6 109:9,24 157:4 210:12,15 211:9 211:14,20 217:19 218:8,17 228:16 228:18 230:7,10 230:24 231:2,13 241:17 <b>David's</b> 218:14 230:15 232:2	<b>Davis</b> 2:14,22 3:2 3:9 22:13,18 <b>dawned</b> 236:13 <b>day</b> 5:8 15:15 18:11 26:4 32:22 52:23 76:11,18 78:16 80:22,22 85:21 90:2 93:14 96:18 107:17 111:6,6 113:10 113:10 136:3 141:19 143:9 151:23 152:17 157:24 171:2 176:6,10,17,25 181:3 202:10,22 206:23 209:6 210:1 227:8 236:20 239:6 240:3 <b>days</b> 25:20 27:19 53:14 115:15 136:3 155:1 163:3 210:13,13 226:7 <b>deal</b> 1:10 15:22 21:8,11 50:20 83:23 89:13 109:21 125:12 228:15,20 230:24 <b>deal/arrangement</b> 36:14 <b>dealing</b> 44:23 64:23 130:22 <b>dealings</b> 146:2 196:4,22 <b>deals</b> 74:10 <b>dealt</b> 113:17,17 <b>dear</b> 26:16 198:18 204:23 207:19 217:7 225:20 <b>death</b> 70:17 <b>deaths</b> 77:9 147:18 <b>debate</b> 223:19 232:17 <b>debrief</b> 108:21,23 109:4 110:15,22 111:5,8 <b>deceased</b> 147:9	<b>December</b> 242:7 <b>decide</b> 33:2 133:23 188:13 189:9 200:24 215:15 <b>decided</b> 36:16 66:19 78:7 133:16 173:24 175:8,8 180:1 242:6,18 <b>deciding</b> 78:23 94:3 <b>decision</b> 9:9,13 18:16 142:19 164:21 167:17 168:14 189:3 190:10,11 192:11 194:12 200:16 201:2 210:3 214:10 224:1 227:25 228:5 <b>decisions</b> 9:6,8 18:22 114:24 <b>decisive</b> 103:18 <b>declare</b> 5:17 <b>declining</b> 199:9 <b>deduced</b> 239:21 <b>deem</b> 188:10,11 189:22 224:22 <b>deep</b> 10:13 11:12 37:4 82:19 152:15 <b>deeper</b> 80:20 117:24 191:24 <b>deeply</b> 156:12,23 165:3 <b>default</b> 171:23 180:7 183:14,25 184:16 187:25 188:1,2,4,10,11 188:12,14,17,21 188:21,22,23 189:23 190:8 198:19 203:8 204:11 206:20 207:5 212:23 <b>defence</b> 22:5 84:11 177:17 <b>defend</b> 237:5 <b>defender</b> 206:9
--	--	--	---	---

<b>defending'</b> 166:11	<b>deployment</b> 109:10	30:16	139:19	<b>discussion</b> 19:24
<b>definition</b> 99:10	<b>depth</b> 192:3	<b>devices</b> 11:4	<b>disappointing</b> 199:19	42:15 74:25
<b>definitively</b> 104:3	<b>Deputy</b> 1:4 2:9,18	<b>dialogue</b> 135:23	<b>discharge</b> 203:11	77:21 98:16
195:20	5:5 19:9 22:17	<b>diary</b> 12:20	203:22 204:5	122:12,14,15
<b>degree</b> 148:24	46:22 47:6 128:3	<b>dictated</b> 94:24	215:2,9,23	145:22 169:18
159:6 164:25	<b>descent</b> 77:10	<b>difference</b> 36:25	<b>discharging</b> 89:2	170:12 171:21
223:3 237:21	<b>describe</b> 11:9	81:6 101:6	<b>disciplinary</b> 62:7	172:1 174:9
238:22	130:16	104:15 168:3	<b>Discipline</b> 62:4	186:2 206:25
<b>degrees</b> 37:4	<b>described</b> 30:18	<b>differences</b> 131:18	<b>disclose</b> 93:15	207:20 222:9
<b>delay</b> 28:20 232:1	31:16	<b>different</b> 7:8 30:4	<b>disclosed</b> 13:14	232:23
<b>delayed</b> 244:25	<b>describes</b> 63:22	37:8,10 45:8	85:24	<b>discussions</b> 169:18
<b>delays</b> 40:2	<b>description</b> 22:22	89:3 98:12,12	<b>disclosing</b> 220:16	243:16
<b>delete</b> 12:22	<b>deserve</b> 38:15	99:10 138:9	221:13	<b>disembarked</b>
<b>deleted</b> 12:23	<b>deserved</b> 42:20	156:16 164:11	<b>disclosure</b> 11:22	14:25 17:3
13:11	43:22 186:19	216:20 217:22	119:22 158:12	<b>disingenuous</b> 89:7
<b>Delhi</b> 10:16 158:1	192:5	231:17	<b>discount</b> 150:6	<b>dismissal</b> 177:19
158:13,15,16,17	<b>despite</b> 41:25	<b>differently</b> 91:25	<b>discourteous</b>	186:1
190:23 197:6	45:11 81:17	<b>difficult</b> 20:8,11	30:21	<b>disparity</b> 80:12
214:20 222:24	144:25 147:24	53:17 68:21	<b>discovered</b> 92:24	<b>displayed</b> 27:24
223:3	<b>destroy</b> 14:1	112:9 210:21	<b>discreet</b> 17:10	117:6 155:13
<b>deliberate</b> 93:22	<b>destroyed</b> 13:11	217:13 218:5	174:23	<b>displaying</b> 140:17
93:24 228:5	13:17 14:4,5,6	221:8	<b>discreetly</b> 172:9	<b>dispute</b> 24:10
<b>deliberated</b> 38:7	<b>detail</b> 56:7 78:21	<b>diffusing</b> 21:13	172:13 174:12,22	57:15 59:15 60:3
<b>deliberately</b> 68:1	113:12 148:3	<b>digest</b> 236:22	<b>discuss</b> 34:2 44:11	<b>disputes</b> 59:9 60:5
92:17 186:4	150:14 158:9	<b>dignified</b> 25:8	46:3 77:24 89:14	<b>disrespectfully</b>
<b>deliberations</b>	179:7,10,11	<b>dignity</b> 186:19	106:4 108:12	25:12
38:20 134:7	192:20 197:15,16	<b>dilemma</b> 21:23	114:11 122:24	<b>disrupted</b> 19:18
183:8 185:23	<b>detailed</b> 24:15	227:10	126:22 127:15	<b>dissatisfaction</b>
207:3 208:24	<b>details</b> 76:12 79:8	<b>diminished</b> 139:23	135:14 136:3	87:18
<b>delineation</b> 112:11	79:15 80:25	<b>dinner</b> 20:23	139:6 140:21	<b>distance</b> 102:18
<b>delivered</b> 116:12	82:22 161:14	77:17 78:1 79:11	152:2,15 199:17	<b>distinction</b> 37:2
126:7	175:21 177:8	79:15 80:3	202:14 214:20	71:6
<b>demeanour</b> 235:18	231:7	<b>diplomacy</b> 27:9	216:6,10 226:1	<b>distinctly</b> 21:14
<b>demonstrate</b> 107:3	<b>Detective</b> 74:21	<b>diplomat</b> 241:14	226:11 231:6	<b>distribution</b>
120:8 133:10	108:23 109:5	<b>diplomatic</b> 68:10	<b>discussed</b> 32:14	181:18 222:18
154:17	110:16	87:20 106:19	33:13 34:15	<b>document</b> 6:3 12:4
<b>demonstrated</b>	<b>deterioration</b>	120:12	76:18,21 109:11	13:5 139:3
38:10 51:1	131:14	<b>direct</b> 91:6 109:16	110:14 121:19	<b>documentation</b>
<b>demonstrates</b>	<b>determine</b> 142:25	154:22 203:14	145:17 153:19	13:17
133:20	182:25	<b>directive</b> 91:16	157:1 159:2	<b>documents</b> 5:23
<b>demonstrating</b>	<b>determined</b> 73:11	94:11 140:8	190:17 192:4	223:18
106:11	96:15 98:5,14	<b>directly</b> 89:1,5,23	202:1 208:19	<b>dog</b> 66:17 67:5,11
<b>denies</b> 44:1 95:2	209:18 212:9	93:9 106:4 156:4	217:11 220:22	69:7 242:9
<b>departed</b> 4:19	<b>determining</b> 107:4	<b>Director</b> 180:19	221:3 237:2	<b>doing</b> 12:10,14
<b>department</b> 178:9	<b>develop</b> 60:12	<b>directors</b> 161:23	<b>discussing</b> 122:21	23:21 35:12 46:4
<b>departure</b> 2:25	<b>developed</b> 243:3	<b>disagreed</b> 167:7	143:10 164:7	62:12 82:18
161:24	<b>Development</b>	<b>disagreement</b> 25:6	165:10 214:13	114:8 122:20
<b>depends</b> 2:21		128:8	216:4 238:3	185:10 199:17
<b>deploy</b> 143:4		<b>disappointed</b>		217:13 218:4

219:12 222:1,16 225:10 242:23 <b>domain</b> 153:8 230:12 <b>door</b> 148:21 243:11 <b>doubt</b> 31:17 38:9 42:24 63:11 66:5 70:14 71:4 72:19 85:2 104:16 117:21 128:12 154:13 156:12 163:12 164:1 183:11 184:9 233:4 <b>downloading</b> 24:13 <b>downwards</b> 3:16 <b>DPP</b> 157:20 160:17 177:5 <b>DPP's</b> 190:25 <b>Dr</b> 5:7 7:4,24 59:7 60:4,8 61:4 63:4 63:5,8,22 64:3 119:13 120:20 124:19,21,25 129:18 134:16 136:2,7,11,13 137:1,10 139:2 141:19,25 143:9 149:19 164:7 169:12 170:25 171:6,23 175:2,6 175:11,13,21 176:11 178:15 179:8,13,20 182:16 183:18 184:11 185:8,14 185:16 186:5,18 186:23 189:19 190:4 191:9 192:5,20,25 193:2 194:5,8 213:8,13 216:14 218:23 224:18 <b>draconian</b> 215:19 215:20 <b>draft</b> 38:23 89:25 128:15,20 129:2	129:3,12 194:19 <b>drafted</b> 7:10 <b>drafts</b> 169:16 <b>drama</b> 16:8,22 17:7,25 <b>draw</b> 37:2 55:24 86:20 137:4 205:18 222:12 <b>drawn</b> 39:5 78:11 145:12 <b>dreary</b> 79:1 <b>driven</b> 140:6 181:6 <b>drivers</b> 226:16,18 <b>drop</b> 4:4 <b>drug</b> 77:8 <b>drunk</b> 42:19 43:21 <b>duck</b> 53:17 <b>ducking</b> 56:9 <b>due</b> 17:14 57:7 97:1 109:12 <b>Duncan</b> 26:18,24 <b>duties</b> 3:3 24:24 <b>duty</b> 89:2 185:10 203:17 215:12 <hr/> <b>E</b> <b>eager</b> 210:11 <b>earlier</b> 138:15 139:10 149:4 184:15 190:6 194:18 197:19 203:6 213:24 218:11 230:22 <b>earliest</b> 10:5 <b>early</b> 2:25 5:7 10:3 40:15 83:13,25 84:15 93:2 135:9 145:24 150:20 172:16 183:16 199:15 229:9,14 229:18 231:5,10 233:1,5 235:25 236:25 244:7 <b>earth</b> 190:7 <b>east</b> 74:17 <b>eastern</b> 77:13 <b>Eastside</b> 147:10 <b>easy</b> 132:24 133:1 140:5 <b>Ed</b> 2:14,22 22:13	<b>Eddie</b> 27:20 29:1 <b>editing</b> 171:3 <b>effect</b> 2:23 5:8 17:20 49:2 61:17 98:8 171:10 173:20 184:10,19 185:12,13 187:23 224:16 228:3 234:16 <b>effectively</b> 46:9 66:12 68:1 189:18 <b>effectiveness</b> 38:9 <b>effort</b> 140:6 <b>efforts</b> 101:15 <b>eight</b> 83:13 139:17 166:6 <b>either</b> 46:20 50:11 50:24 51:8,11,12 79:3 93:21,24 104:8 108:22 128:25 152:8 153:21 155:24 178:8 192:23 195:25 205:13 <b>either/or</b> 58:7 <b>elected</b> 62:15 <b>element</b> 133:4 157:11 159:5 170:7 174:24 222:13 <b>elements</b> 23:20 86:11 132:11 163:5 194:25 238:25 <b>email</b> 5:10 6:12,18 11:18 20:13 26:15 27:16 29:15 37:24 38:1 57:4 82:13 89:25 96:17 97:21 99:13,25 100:22 100:23,25 101:2 101:6,8,13 102:19 103:23 110:13 111:21 113:4,20 115:9 115:10,11,16 116:18 126:15	132:6,21 133:22 134:14,15,20,22 135:7 139:9 141:9,19 142:3 142:18 143:14 168:19 171:2 172:22 174:3 175:13,17 177:11 180:9,25 185:18 194:13 204:20 206:6 207:17,17 208:9,15,15 209:25 210:25 211:6 218:10,25 225:17,18 227:18 <b>emailed</b> 5:7 65:21 <b>emails</b> 13:19 87:13 101:19 132:18 148:25 176:12 185:25 222:19 229:12 237:9 <b>embarrass</b> 3:7,8 <b>embarrassed</b> 29:6 <b>embassy</b> 32:13 113:14 114:2 <b>emotion</b> 157:12,13 <b>emotionally</b> 239:23 <b>emphasis</b> 160:20 <b>emphasise</b> 24:25 <b>emphasising</b> 145:8 <b>enabled</b> 59:19 <b>encompass</b> 58:7 <b>encourage</b> 186:22 <b>endorsed</b> 128:14 182:17 243:19 <b>ends</b> 102:13 <b>engage</b> 148:5 <b>engaged</b> 240:25 244:2 <b>engagement</b> 110:11 119:17 149:15 169:12 244:5 <b>engagements</b> 127:19 <b>engaging</b> 45:21 128:4 <b>engineered</b> 67:4	<b>enjoyed</b> 25:18 126:2 <b>enquiry</b> 34:4 <b>ensure</b> 14:2 18:20 201:9 <b>ensuring</b> 3:6 <b>entail</b> 8:24 <b>entered</b> 150:12 162:8 <b>entirely</b> 38:7 200:21 <b>entirety</b> 37:25 <b>entitled</b> 12:4 18:21 197:14 <b>entitlements</b> 236:19 <b>entrenched</b> 21:14 <b>entry</b> 67:15 98:1 106:1 129:15 <b>envelope</b> 234:1 <b>Environmental</b> 4:3 <b>envisaged</b> 34:12 36:1 221:9 245:1 <b>envisaging</b> 124:19 <b>equality</b> 165:11 <b>equipment</b> 39:25 94:24 155:9 <b>equities</b> 232:4 <b>Ernest</b> 7:10 <b>erroneous</b> 100:20 101:1,4 152:5 <b>error</b> 100:6 157:17 160:14,23,24 <b>errors</b> 195:11 <b>ES</b> 77:8 <b>escalation</b> 21:24 <b>esoteric</b> 36:24 <b>especially</b> 84:1 117:18 151:1 <b>essence</b> 139:16 <b>establish</b> 3:14 20:10 68:15 <b>establishing</b> 102:11 <b>ethics</b> 133:11 <b>ethics/culture</b> 40:21 <b>EU</b> 76:13
---	--	---	---	--



<b>Europa</b> 112:9,18 112:21	194:15,16 216:7 223:10 227:2	182:13	<b>explaining</b> 7:12 56:6 84:3	69:16 167:23,23
<b>Europe</b> 26:25 28:15 29:24 30:8	236:2,7 238:5 244:12	<b>excuse</b> 123:22,25	<b>explains</b> 115:8	<b>facts</b> 51:2 73:10
<b>evasive</b> 119:23 155:5	<b>evident</b> 49:6	<b>execution</b> 24:24 157:18 158:5	<b>explanation</b> 81:4 119:2	<b>fail</b> 28:6,10,10
<b>evasiveness</b> 120:7	<b>exact</b> 39:22 72:14 72:23,24 74:24	<b>executive</b> 162:4,15 201:5	<b>explicitly</b> 136:20	<b>failed</b> 203:11,21 204:4 215:9
<b>evening</b> 76:9 79:22 89:11,19 199:7 229:4	83:10 85:1 92:8 98:4,14 102:11 104:4,15,21	<b>exercisable</b> 203:10 203:20 204:4 215:8	<b>explore</b> 11:7	<b>failing</b> 28:9 97:6
<b>event</b> 11:15 18:12 25:7 191:4 229:19	105:3 129:14 138:2 153:22 159:14 179:12 218:20	<b>exercise</b> 122:18 126:25 127:25 186:23 198:4 199:13,23 200:17 219:10	<b>explored</b> 53:3	<b>failings</b> 182:19
<b>events</b> 15:2 21:24 24:7,9 26:19 27:10 29:11 62:14 65:21 66:11 192:21	<b>exactly</b> 8:25 31:16 42:18 69:9 157:6 158:2 159:9 241:8	<b>exercising</b> 216:16	<b>exploring</b> 187:14	<b>failure</b> 40:13
<b>eventually</b> 39:14 168:16	<b>examination</b> 39:21 40:8 97:9	<b>existed</b> 15:7	<b>expose</b> 30:22	<b>fair</b> 23:9 40:23 41:3 46:5 49:7 55:7,24 71:20 86:3 141:21 145:9 151:4 153:2 173:23 185:1,6 203:25 212:19 234:8 245:16
<b>evermore</b> 205:8	<b>examined</b> 52:9 124:4	<b>existing</b> 10:17,21	<b>express</b> 25:9 87:17 197:5	<b>fairer</b> 23:8
<b>everybody</b> 3:15 17:22 22:11 138:10 164:23 181:22,24	<b>example</b> 32:20 47:19 52:23 54:9 85:24 92:4 107:6 114:23 124:2 135:9 138:9 143:12 175:24	<b>exists</b> 130:19	<b>expressed</b> 29:15 32:4 35:20 53:23 191:10,13 197:24 223:7 230:19	<b>fairly</b> 191:15 201:11
<b>everybody's</b> 22:19	<b>Excency</b> 130:1	<b>exit</b> 76:13 232:21	<b>expressing</b> 39:3 127:12 132:21 133:24 134:16 142:18 186:12 189:12	<b>fait</b> 189:19
<b>evidence</b> 5:6 13:23 18:7 35:9,10 36:20 37:16 40:5 40:16 42:3,13 43:20 48:21 50:21 56:5,13,14 57:4 59:2,3 60:4 61:1 64:3 67:20 68:9,22,24 75:4,8 76:8 78:12 80:24 86:8,13 87:14 95:3,9,12 96:11 100:15 105:23 107:9 108:1,4,6,8 109:5 118:9,10 118:11 130:11 131:2,21 133:19 136:14 148:20 153:3,9,17 156:4 166:8,13 179:20 182:14 183:22 185:8 186:18 190:15 193:14	<b>examined</b> 52:9 124:4	<b>exonerated</b> 31:1	<b>expression</b> 18:1 63:9 98:10 162:10	<b>faith</b> 163:7,13 172:25
	<b>example</b> 32:20 47:19 52:23 54:9 85:24 92:4 107:6 114:23 124:2 135:9 138:9 143:12 175:24	<b>expand</b> 78:14	<b>expressly</b> 62:3 68:25 89:9 191:6 191:9	<b>fall</b> 62:3 65:24
	<b>Excency</b> 130:1	<b>expanding</b> 158:4	<b>extended</b> 60:14	<b>fallout</b> 25:25
	<b>Excellent</b> 142:9	<b>expect</b> 52:24 183:23	<b>extent</b> 7:9	<b>falls</b> 62:5 215:5
	<b>exception</b> 35:15	<b>expectation</b> 65:19	<b>external</b> 68:12 92:23 130:24	<b>familiar</b> 127:3 219:7
	<b>exchange</b> 62:20 64:20 66:15 72:17,23 73:7 86:8 97:17 101:14 121:2 127:4 129:16 132:6 147:1,2 151:6 152:12 174:11 176:12 181:13 204:15 206:6 214:2 217:5 234:16 239:5	<b>expectation/hope</b> 187:5	<b>extra</b> 217:16	<b>familiarise</b> 175:25
	<b>exchanges</b> 86:24 143:8 145:25 166:4 177:9 210:10 239:3	<b>expected</b> 105:8 124:22 128:22 131:15 216:11 218:11	<b>extremely</b> 30:20 208:17	<b>families</b> 147:9
	<b>exclamation</b> 182:4	<b>expecting</b> 112:6,13 216:21 241:10 242:10	<b>eye</b> 45:9 177:12 178:11	<b>family</b> 17:12,16 86:18
		<b>experience</b> 50:2 243:10	<b>face</b> 177:18 186:21 221:10	<b>far</b> 41:2 43:1 70:21 82:24 102:10 110:24 120:12 129:12 138:24 151:19 165:11 197:1 235:18 238:22
		<b>experienced</b> 110:6	<b>F</b>	<b>fashion</b> 179:9
		<b>experiences</b> 156:6	<b>f</b> 183:3 212:22	<b>fatal</b> 178:22 180:14
		<b>explain</b> 10:2 46:16 54:2 69:15 78:21 146:16 161:8 189:7 220:22 227:14 238:15 241:12	<b>Fabian</b> 148:8 149:1	<b>fatalities</b> 65:2
		<b>explained</b> 54:25 60:15 67:25 104:9 106:5 114:17,18 141:18	<b>fact</b> 17:11 27:25 33:21 43:4 77:1 79:3 108:16,22 110:9 114:19 201:1 226:2 231:9 239:23	<b>fathom</b> 82:18
			<b>factor</b> 21:23 23:10	<b>fault</b> 26:2
				<b>FCDO</b> 27:4 71:1 168:19 178:9 180:9 199:5 220:10 228:11

237:13 <b>FCO</b> 12:9 14:8 20:13 21:20 26:15 27:13 72:11 73:6 87:8 103:25 114:1,14 155:19 165:16 243:22 <b>February</b> 4:13 5:1 6:13 14:19 24:8 26:19 29:12 34:5 61:11 <b>February/March</b> 4:12 <b>federation</b> 44:25 56:12,16,19,24 56:25 57:5,18 58:2,4,5,9,23 60:23 137:18 147:21 150:20,24 166:10 178:23 180:14 <b>Federation's</b> 131:7 131:16 <b>feedback</b> 133:24 <b>feedback/expres...</b> 133:15 <b>feel</b> 7:3 11:6 128:24 138:16 <b>feeling</b> 49:8 144:18 227:19 231:23 <b>feelings</b> 36:6 165:9 166:25 183:12 184:9 <b>feels</b> 198:3 <b>fees</b> 237:4 <b>fell</b> 171:24 <b>felt</b> 45:13 46:25 64:9 151:17 171:12 196:4,21 230:7 231:11 235:14 <b>field</b> 48:6,12 67:3 74:10 75:7 <b>Field's</b> 118:10,11 <b>fifteen</b> 69:5 <b>fifth</b> 16:19 43:17 181:4	<b>file</b> 5:22 12:21 56:20 61:14,19 <b>filed</b> 59:23 121:11 123:11,21 147:8 150:9 <b>fill</b> 46:25 <b>final</b> 1:17 2:2 98:1 105:21 107:14 116:23 144:15 207:4 210:5 211:6,25 227:20 231:18,18 <b>finally</b> 8:14 222:3 <b>financial</b> 119:4,8 124:11 153:19 162:3 179:14 <b>find</b> 13:6 18:11 70:6 120:7 131:1 139:14,20 164:25 190:25 191:21 204:23 236:14 239:4 244:16 <b>finding</b> 63:23 <b>findings</b> 141:5 <b>fine</b> 114:5 184:17 196:19 <b>finger</b> 148:22 <b>finish</b> 172:20 202:22 <b>finished</b> 19:20 79:23 157:7 <b>firm</b> 38:3 130:15 149:22 154:8 167:13 221:23 <b>firmly</b> 70:15,17 80:9 86:19 169:1 169:8 214:7 <b>first</b> 1:10,13,14,16 2:10,14 4:1 5:8 5:21 9:16,21 10:11 14:10 24:5 34:17 51:18 52:6 59:4,6 61:13 66:4 67:8 72:1 74:9,12 79:9 80:1 101:9 102:2 106:11 108:3 113:7 115:24 116:10 129:11	130:1 132:21 133:18,25 134:5 140:23 143:23 145:12 150:23 155:1 160:13 165:12 171:21 175:9 177:13 178:17 182:10 192:22 196:9,11 200:15 208:8 210:16,20 235:11 238:9 242:19 245:1 <b>first'</b> 154:5 <b>fitted</b> 57:10 204:25 206:9 207:13,15 <b>five</b> 14:19 19:21 64:22 70:23 210:13 220:19 <b>fix</b> 140:5 141:13 <b>fixed</b> 23:14 <b>flat</b> 234:14 <b>flawed</b> 31:2 33:18 35:18 212:5 213:1 <b>flaws</b> 52:16 213:9 213:15 <b>fleeting</b> 67:23 <b>flight</b> 16:9,23 <b>flippancy</b> 155:6 <b>flippant</b> 68:20 82:9 164:13 <b>flowed</b> 60:2 <b>fluid</b> 52:20 <b>flying</b> 41:25 217:17 <b>FMA</b> 114:1 <b>focus</b> 9:20 51:19 55:19 57:19 77:4 86:24 97:25 104:1 144:13 147:4 166:6 168:7 203:18 210:17 234:13 <b>focused</b> 69:25 98:25 147:3 <b>focusing</b> 55:3 82:1 91:4 105:2 141:8 208:8	<b>folder</b> 52:24 <b>follow</b> 134:17 136:6 177:15 180:4 187:6 204:9 <b>followed</b> 2:15 12:9 62:11 183:20 237:9 <b>following</b> 4:12 136:2,3 151:23 166:17 203:9,20 205:11 220:18 224:7 240:3 <b>follows</b> 73:12 88:10 96:21 178:18 210:1 <b>fools</b> 27:24 <b>foot</b> 106:19 <b>force</b> 62:8 66:13 131:1,7 203:14 <b>forced</b> 60:13 237:8 <b>forceful</b> 91:16 <b>Forces</b> 16:3,12 24:7,11,21 25:11 <b>fore</b> 156:5 <b>foreboding</b> 207:5 <b>foreign</b> 12:12 20:1 20:5 30:16 32:18 37:3 83:12 134:4 135:22 241:18 242:3,14 243:17 <b>foremost</b> 1:10 133:25 <b>forensic</b> 39:18,21 40:3,7,13 42:3 97:9 104:25 <b>forensically</b> 52:9 124:4 <b>forgive</b> 83:9 147:6 241:11 <b>forgiving</b> 97:3 <b>form</b> 33:14 35:11 <b>formal</b> 31:25 34:16 37:6 44:12 56:24 57:21,21 58:2 59:12,18 60:7,23 63:19 <b>formally</b> 30:13 31:24 33:10	45:25 58:10 103:22 145:20 148:15 <b>formed</b> 60:21 <b>former</b> 1:4 2:25 118:25 217:25 219:21 <b>formulate</b> 138:13 <b>formulated</b> 32:19 <b>formulating</b> 148:14 <b>forthcoming</b> 103:19 <b>fortnight</b> 152:19 <b>fortune</b> 28:23 <b>forward</b> 6:15 54:14 124:22 140:21 141:1 149:7 153:1 166:1,21 168:12 173:13 174:10 177:13,17 189:9 189:14 190:5 202:4 209:17,19 222:21 223:21 224:1,23 230:3 232:6 235:4 <b>forwarded</b> 127:10 <b>forwards</b> 177:22 204:18 205:2 <b>found</b> 28:1 40:10 93:18 127:12 139:16 <b>four</b> 65:1 72:1 192:9 226:1 236:19 245:5,9 245:17 <b>fourth</b> 96:22 103:25 106:1 234:13 <b>fracture</b> 22:2 <b>fractured</b> 41:24 44:24 56:14,17 57:16 <b>frame</b> 211:7 <b>Frank</b> 16:3 23:3 31:10 <b>frequency</b> 95:19 <b>frequently</b> 3:25
--	---	---	---	--

136:15 151:9 158:7 <b>Friday</b> 115:10 121:12 123:2 124:18,20 218:16 221:19 223:13 226:8,13 233:3 235:23 236:5,9 <b>friendly</b> 15:4,6 <b>friends</b> 77:23,23 <b>front</b> 1:12 5:22 9:18 16:11,15 17:21 140:16 147:14 <b>FRS</b> 233:23 <b>frustrated</b> 80:17 156:12 <b>frustration</b> 39:9 156:23 <b>full</b> 35:7 38:16 96:24 124:15 135:1,4,14,16 136:1 158:11 179:11 192:20 <b>fully</b> 8:15 27:22 29:19 93:15 109:20 128:13 163:24 185:3 218:11 <b>fun</b> 78:9,24 <b>functions</b> 8:11 201:4 <b>fundamental</b> 81:12 213:9,15 <b>fundamentally</b> 212:5 213:1 <b>further</b> 32:17 47:6 65:6,12,14 67:9 96:19 102:14 103:2 107:5 154:16 186:2 193:14 199:6 208:13 225:19 232:23 241:13 245:4 <b>Furthermore</b> 88:1 88:11 119:20 <b>future</b> 53:20 54:16 139:23 157:3	222:22 <b>FYI</b> 129:19 <hr/> <b>G</b> <hr/> <b>G--</b> 166:20 <b>game</b> 37:8,9 <b>gap</b> 60:11 219:23 219:25 220:21 221:2 <b>Gary</b> 108:24 110:16 111:9 <b>gather</b> 202:9 240:12 <b>gathered</b> 103:11 <b>general</b> 2:14 3:2,9 6:21 8:16 22:12 22:18 27:18 29:4 47:25 61:7 64:8 67:1,19 74:23 76:10,24 77:1,16 78:2 79:2 80:14 81:22 83:5 85:10 88:3 89:10,18 90:6,10 94:3 98:3,25 102:21 103:3,12 104:9 105:12,13,14 106:12 111:22 122:15 127:7,13 128:20 141:7 145:22 177:5 178:8 180:18 206:25 207:18 208:10 209:5,8 209:22 210:2 213:21 214:3,17 214:19 216:6,10 220:8 222:10 225:10,24 229:5 230:4,18 242:20 <b>General's</b> 77:14 127:8 213:25 <b>generally</b> 41:15 64:6 90:3 <b>genuine</b> 25:10 28:7 <b>getting</b> 102:11,16 143:10 178:6 <b>Gibraltar</b> 2:10 3:7 3:8,24 5:3 10:4	14:20 15:5,8,25 16:3,10,13,15,24 18:14 19:10,14 21:16 22:8 24:8 24:9,12,21,23 25:11,13 26:6,9 28:10,18 29:1 30:14 32:13,20 32:20 33:3 41:20 41:22 44:24 47:24 48:18 56:15,19 57:18 60:14 76:13 78:18 84:10 85:11 88:18 92:11 98:21 99:5 106:12,17 107:4 113:17 120:12 124:12 129:7 131:16 135:25 138:25 154:13 157:11 164:9 173:4 182:8 198:8 199:10 201:7 203:15 205:7 206:11 207:7 208:21 218:1 241:15 242:18 243:4,14 243:21 <b>Gibraltar's</b> 20:17 48:12 81:7 92:23 120:6 243:7 <b>Gibraltarian</b> 48:8 48:11 138:12 <b>give</b> 4:19 37:1,16 45:25 53:17 55:14 60:16 69:23 125:2 138:19,20 143:19 179:7 192:20 193:2 197:20,21 244:11,13,14 <b>given</b> 2:23 15:3 18:7 23:6 40:10 43:14 45:5 64:3 65:18 67:18 68:10 76:6,13,16 87:5 95:1 97:14	103:15 105:1 120:15 121:5 123:18 124:25,25 125:1 126:20 129:5 140:20 148:20 153:4 159:17 164:4 166:8,13,14 169:1 170:12,24 171:25 173:7 175:21 176:20 191:18 198:6 199:25 216:10 223:24 224:18 226:12 227:11 229:23 232:4 236:21,22 245:8 <b>gives</b> 7:2 147:19 172:7 <b>giving</b> 71:18 169:12 <b>go</b> 4:6 5:21 9:15 10:8 11:18 20:15 26:13 27:15 30:9 33:23 34:14 37:5 37:19 38:1 39:7 39:16 41:17 44:21 51:17 56:7 58:13 59:6 64:19 66:3,8 67:12 71:23 73:5 75:6 75:23 76:8,22 78:7,20,23 79:17 81:25 86:23 90:4 94:13 95:17 96:22 97:23 99:12,25 100:16 101:12 102:2 103:23 105:16 109:4 111:20 112:7 117:24 118:17,19 120:22 121:16 122:8 125:12 126:14 129:10 137:5 138:18 139:8 143:7,15 144:1,2 144:9,11 146:25 147:23 150:17	154:5 168:18 172:3,20 180:8 181:3 182:14 184:21 190:12 195:23 199:4 200:14 201:16,22 203:5 204:19,22 205:1,4,25 206:15 207:16 208:13,14 211:4 211:25 212:22 216:7 217:4 220:7 221:15 223:9 225:15 228:11,25 233:6 239:1 240:20 242:5,17,21 <b>goes</b> 36:4 84:24 93:11 104:14 124:10 128:3 130:3 131:11 163:7 170:1 184:14 227:9 <b>GoG</b> 82:22 114:13 <b>going</b> 4:9,10 5:10 53:3 68:9 78:5 83:24 115:6 116:16,21 122:16 124:8 126:2 134:6 143:17 147:11 148:5 153:9 154:13 158:12 161:2 163:5 166:18 167:13 169:13 172:8 173:19 174:11,21,22 177:4 187:24 188:19 196:13 200:3 202:14 204:12 205:22 206:14 219:1 221:5,21 225:2 226:11 232:20 239:21 240:4 245:6,7 <b>golf</b> 45:19 <b>Gomez</b> 7:10 22:7 118:22 199:2
---	---	---	--	--

202:5 208:3	128:25 129:22	171:23 173:19	<b>grievances</b> 131:17	144:6 159:7
210:8 225:7,12	133:3 140:14	174:6,6 176:3,5	<b>groaning</b> 116:13	175:5 214:15
226:23 228:9	163:10 171:24	176:14 177:13	<b>ground</b> 20:8	<b>happened</b> 3:25 7:8
231:24 232:10	186:11 189:2,5	179:3 180:5	245:15	11:14 14:19 25:5
<b>Gonçalves</b> 35:17	189:12 196:3,21	182:25 183:8,11	<b>grounded</b> 242:3	42:25 54:17
48:20 49:5	197:24 201:13,15	183:19 184:8,15	242:14,24	69:13 73:13 78:4
<b>Gonçalves'</b> 46:15	203:10,21 209:13	185:19 186:12	<b>grounds</b> 212:11	78:17 82:16 85:3
<b>Goncalvez</b> 18:6	210:12 214:10	187:5,8 188:13	<b>group</b> 105:19,19	85:25 89:22
<b>good</b> 1:3,8,9 3:14	215:8 217:1,5,6,7	188:20,25 189:1	107:22 115:5	101:11 102:1
23:20 26:21 27:7	217:25 219:15	189:8,9,23 190:4	138:22 181:16	107:5 109:1
28:23,24 29:16	220:2,4,4 229:15	190:7 192:1,7,10	<b>growing</b> 45:14	110:19 111:13
29:21 77:6,7,22	229:20 231:8	192:11,15 193:12	66:7 137:8	133:7 148:4
77:23 81:3 102:5	243:6,6,19	193:17,23 194:2	144:17 205:8	150:4 156:18,22
107:6 110:4	<b>Governor's</b> 7:6,13	194:11 197:13,18	<b>guaranteed</b> 8:11	173:22 190:11
114:23 117:21	36:6,9,13,20	199:3,7,16,25	<b>Guardia</b> 74:16	<b>happening</b> 18:19
125:22 142:6,15	63:14 65:25	201:10,13 202:5	104:18 117:12,20	95:21 126:11
142:16 166:7,11	88:12 154:22	203:24 204:8	118:5,9	146:11
205:7 214:6	203:8 216:12	205:16 208:1,3	<b>guess</b> 231:15	<b>happens</b> 174:5
217:15 228:12	229:17 233:11	208:25 209:9,13	<b>guidance</b> 12:12,12	243:3
232:6 243:20	<b>governors</b> 4:25	212:17,23,24	12:17 32:16 60:3	<b>happy</b> 6:2 26:20
245:17	170:3	215:1,2,8,10,23	171:6 178:3	27:7,8 83:22
<b>goodbye</b> 28:22,25	<b>governorship</b>	215:25 218:12	<b>guilty</b> 40:10	140:20 142:25
<b>governance</b> 205:7	128:6 214:7	225:5,23 226:17	<b>guy</b> 85:14	172:14
<b>government</b> 29:2	<b>GP</b> 225:6	226:23 229:6	<b>guys</b> 65:10	<b>harassment</b> 131:2
29:16 169:10	<b>GPA</b> 5:9,14,16	233:13,21,25		<b>hard</b> 5:24 9:19
239:11 243:4,14	6:14,17,19,21,23	235:8,25 236:6	<b>H</b>	22:14,24 30:21
243:21 244:3	7:2,7,11,14,15,21	<b>GPA's</b> 8:10 33:17	<b>half</b> 83:15	45:5 82:17 86:21
<b>governments</b>	7:25 10:9 18:7	35:10 194:12	<b>halfway</b> 21:6	93:18 190:20
120:12	30:24 31:1,6,21	<b>GPF</b> 59:11	24:18 75:25	195:2
<b>governor</b> 1:4 2:9	34:3,12,18 36:1	<b>GPF/</b> 61:7	96:23	<b>hardcopy</b> 37:21,23
2:13,18,19,22 3:1	36:23 37:13,17	<b>GPS</b> 86:6 90:23	<b>hall</b> 17:13,23	<b>harder</b> 52:12
3:21,23 4:2,14,16	37:23 38:3 44:5	206:17	<b>hand</b> 59:10 67:2	<b>harp</b> 55:7
4:18,22,24 5:5,13	44:9 45:23 46:3	<b>GPS/AIS</b> 94:16	71:7 85:22 110:1	<b>Hassans</b> 161:12
5:16,18 6:17,20	46:23,24 47:5	<b>Grace</b> 23:23	155:8 225:3,11	162:5,9,13,17,23
7:22 8:7 9:6,12	48:7,21 51:15	<b>graphic</b> 112:4,7	225:21 226:3,22	163:17 179:14
14:21 19:8,9,13	52:15,18 56:25	<b>grateful</b> 114:2	<b>handed</b> 40:1,6	181:2,23 182:6
20:24 22:16,17	57:1,5,22 58:5,11	239:19	190:3 205:13	214:19
22:17 23:1 28:15	58:23 60:16,18	<b>gratitude</b> 26:22	225:14 227:18	<b>haste</b> 211:18
29:24 30:15	61:5,10,12 63:16	<b>grave</b> 119:3	<b>handing</b> 226:9	<b>hate</b> 69:6
32:21,21 33:21	63:20,23 118:20	197:23	235:10	<b>head</b> 40:19,24
35:25 44:18	119:11,17 120:18	<b>gravely</b> 144:21	<b>handle</b> 135:15	133:1 150:19
46:21,22 47:6	121:14 124:22	<b>Graves</b> 242:12	<b>handled</b> 25:7	182:5,6 241:13
53:25 54:1,1	129:18,20 133:18	<b>gravity</b> 57:10	<b>handling</b> 24:12	<b>headed</b> 56:14
65:23 68:13	133:25 134:3,7,9	<b>great</b> 6:11 83:23	110:8 114:7,7,12	<b>heading</b> 167:2
83:20,20,21	134:12 140:13,22	89:13 108:11	139:16	196:16
88:16,17,19,21	141:15 144:7	109:21	<b>hands</b> 68:20	<b>headless</b> 172:10
88:24 92:21	145:19 166:1,19	<b>Green</b> 16:3,11	217:16	<b>headline</b> 140:2
103:21 119:16	166:20 167:10	23:3,4 31:10	<b>handwritten</b> 99:21	141:11 158:11
120:9,19 128:4	168:16 169:5,13	<b>greet</b> 17:12	<b>happen</b> 18:20 35:5	179:9 191:23
			39:2 44:9 63:3	

<b>headlines</b> 73:12 96:21	178:24 180:16 181:7	<b>hope</b> 65:10 82:20 82:25 121:8	<b>illusion</b> 224:20	<b>in'</b> 70:2 80:11
<b>headquarters</b> 16:16 169:20	<b>highlighted</b> 195:24	143:16 217:14	<b>illustrates</b> 28:1	<b>inaudible</b> 121:24 221:20 232:16
<b>health</b> 236:16	<b>highly</b> 38:8 102:15 102:25 111:19	218:6 231:20	<b>IM</b> 88:7	<b>incident</b> 4:11 10:4 10:5,19,24,25
<b>hear</b> 25:10 26:8 45:16 65:8 102:5 103:5,20 105:25 213:12	155:3 173:1	<b>hoped</b> 218:10	<b>image</b> 84:21	11:14,17 14:9,12 14:18,21 15:20
<b>heard</b> 22:23 26:6 26:12 35:8 45:3 46:7 58:16 95:5 174:7 198:22	<b>Hill</b> 78:7 84:9,12 84:18 85:5,8 86:4,8,14,16 103:12	<b>hopefully</b> 5:23 53:18 132:23	<b>imagery</b> 40:9	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22
<b>hearing</b> 53:22	<b>hindsight</b> 25:1 91:23 93:11,23 125:6,13 175:22 192:22 193:5,6 238:19	<b>hoping</b> 173:21 187:4	<b>images</b> 40:11	34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>heat</b> 94:22 97:4,19 155:10,16,22	<b>hitherto</b> 205:10	<b>hour</b> 77:5 84:2 142:8 202:19,21	<b>immediate</b> 119:21 153:20 228:2	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>held</b> 2:8 34:11,13 36:10 42:4,8 49:24 61:9 64:6 136:7 149:23 182:23 208:22 233:10	<b>hits</b> 72:5	<b>hour's</b> 20:1	<b>immediately</b> 65:17 114:16 223:14,18 228:10	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helicopter</b> 10:25 41:19,21 43:21 46:5 54:10,23 55:8 56:1 137:17	<b>hitting</b> 125:17	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>imminent</b> 121:6	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helmet</b> 67:2	<b>HLA</b> 222:5	<b>hour's</b> 20:1	<b>imminently</b> 5:11	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helmsman</b> 96:24 97:6	<b>HMG</b> 3:7,8 20:16 65:9 92:22 165:16	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>impact</b> 81:18 83:2 135:22	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>help</b> 2:23 102:6 106:10 139:22,24 152:24 171:6 174:17 217:16 236:10	<b>HMIC</b> 10:19 64:11 129:9,12 132:16 133:5,17 133:23 138:23 139:11,16,19 144:23 145:4 146:3 147:21 150:18 152:20 178:21 180:13 233:23	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>impartiality</b> 199:20 200:5	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helped</b> 20:10 194:19	<b>HMGOG</b> 22:3 68:14	<b>hour's</b> 20:1	<b>implementation</b> 138:23	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helpful</b> 7:18 12:15 70:12 106:20 117:13 175:20 230:2 245:10	<b>HMICFRIS</b> 133:16	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>implications</b> 119:5 119:9 146:12 153:19 177:9	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helping</b> 26:23 243:4,14	<b>hold</b> 27:4 187:24 188:1 189:22	<b>hour's</b> 20:1	<b>implicitly</b> 128:9	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>helps</b> 106:3,7	<b>holders</b> 115:6	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>implied</b> 127:22	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>hesitate</b> 28:4	<b>holding</b> 135:21	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>importance</b> 92:21 97:13 164:15	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>Hi</b> 147:7	<b>holds</b> 181:25	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>important</b> 3:13 32:17 69:16 75:21 90:2 92:18 95:1 99:2,3 111:7 140:12 152:3 177:14 185:22 207:13,14	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>high</b> 27:3 98:16 136:7 162:6 181:24	<b>holiday</b> 22:21 114:4	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>imposed</b> 203:12,23 215:10	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
<b>high-profile</b>	<b>honest</b> 112:23 140:16	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>impressed</b> 28:16 29:25	16:7 19:7 23:7 23:13,14,17 26:1 27:5,13 30:22 34:4 38:6,11,15 38:20 39:11,19 41:4,10,13,19 42:11 43:4,8,19 43:20 46:6 50:4 54:9,10,22 55:2,8 55:13,19,20 56:1 60:11,12 64:18 64:24 66:6,10 68:12,15,24 69:12 70:16 72:9 72:21 73:10,13 76:12,17 77:11 77:16 78:4 82:10 82:15 85:3,24 86:21 90:8 91:19 92:16,20 93:3,6 95:14 99:10 101:11 102:1 104:3 108:13 109:1 110:19 111:13 119:1,21 119:24 120:2,3 124:7,10 126:18 137:11,14,17,21 138:10 146:3 147:9,23 151:4,8 151:10 152:19 153:7,11 154:8 154:11,15,23 155:1,3,14,25 156:17 160:7 167:21 168:1 178:21 196:24 220:1 233:23
	<b>honorary</b> 199:16	<b>hours</b> 65:20 67:7 72:2 73:13 93:3 142:1	<b>impression</b> 18:	

<p>65:24 144:16 159:20 <b>include</b> 143:2 <b>included</b> 105:20 206:2,3 <b>includes</b> 24:9 <b>including</b> 8:8,18 23:22 45:7 88:8 100:3 107:25 114:12 165:15 193:7 208:5 210:7 223:23 232:4 <b>income</b> 162:18 <b>incoming</b> 229:15 229:20 <b>incomplete</b> 100:20 101:1,4,7 <b>inconceivable</b> 76:20 77:19 127:19 159:12 191:22 <b>inconsiderate</b> 25:14 <b>incorporated</b> 13:18 <b>incorrect</b> 16:25 <b>incredible</b> 18:11 <b>incredibly</b> 221:8 <b>incriminating</b> 40:5 <b>incursion</b> 96:1 <b>incursion-report...</b> 81:9 <b>incursions</b> 81:11 95:10,20 <b>indecent</b> 24:14 <b>independence</b> 8:10 189:1 <b>independent</b> 34:13 36:2 38:18 101:16 162:25 163:19 203:25 212:2 244:12 <b>independently</b> 166:23 201:11 <b>indicates</b> 229:12 <b>indicating</b> 117:7 <b>indication</b> 69:23 <b>indications</b> 108:25</p>	<p>110:18 111:12 <b>indirect</b> 161:18 <b>indirectly</b> 89:5 <b>individual</b> 15:1 17:2 24:13 48:17 49:16 <b>individually</b> 197:4 202:13 <b>individuals</b> 20:19 40:18 62:2 179:17 <b>inert</b> 21:22 22:21 <b>inevitably</b> 162:18 <b>infer</b> 207:1 <b>inferring</b> 136:21 <b>infers</b> 195:11 <b>influence</b> 9:12 50:5 93:13 134:7 223:4 <b>influenced</b> 166:24 167:18 <b>inform</b> 117:13 176:24 223:25 <b>information</b> 1:21 2:6 31:5 68:3 71:19 72:17 73:16 77:17 80:2 80:13 81:19 83:3 83:4 85:22 86:17 88:7,8,14,20,25 89:3,18 90:24 91:18,21 92:3,18 93:2 94:5,17 100:20,21 101:8 103:9,22 104:17 105:7 108:8 116:25 117:22,25 118:14,16 119:22 125:4,24 126:10 181:9 191:18 192:6,16 193:3,9 197:8 205:22 213:4 226:25 <b>information/</b> 108:3 <b>informed</b> 8:16,24 9:9 31:9 61:22 122:17 127:23 192:11</p>	<p><b>informing</b> 107:25 120:3 194:12 209:4 <b>initial</b> 48:21 73:12 84:8 110:15 112:16,21 114:11 140:23 <b>initially</b> 43:7 71:22 181:10 <b>injunction</b> 220:14 220:24 <b>innocent</b> 137:25 156:21 <b>input</b> 194:20 <b>inquiry</b> 1:14,25 13:15 18:8 30:22 34:13 35:4 36:2 36:9,17,22 37:1,7 37:8 38:16 48:20 49:5 51:19 79:10 118:11,12 134:23 203:15 244:12,20 244:25 <b>inserted</b> 178:12 195:25 <b>inside</b> 68:18 70:17 82:17 85:3 86:1 86:22 91:19 92:9 92:10 93:6 101:11 102:1,8 104:4,6 138:3 <b>insisted</b> 39:20 <b>Insofar</b> 50:21 <b>Insp</b> 74:14 <b>inspection</b> 130:24 139:21 140:11 147:21 150:19 152:22 203:14 <b>Inspector</b> 67:3 68:5 118:10 <b>instance</b> 34:17 133:18 134:5 140:23 177:14 <b>instances</b> 106:13 <b>instinct</b> 121:4 122:10 195:19 228:14,19 230:23 <b>instincts</b> 114:7 <b>institution</b> 40:17</p>	<p>136:16,17 <b>institutional</b> 64:10 <b>institutionalist</b> 55:18 <b>instruction</b> 12:13 33:4 <b>instructions</b> 95:17 95:19 <b>instruments</b> 94:18 <b>insulting</b> 164:25 165:7 <b>integrity</b> 9:24 196:2,6,17,24 197:3 244:23 <b>intend</b> 6:20 <b>intended</b> 77:1 126:23 185:13 219:24 224:12 <b>intends</b> 228:13 229:13 <b>intense</b> 185:19 <b>intent</b> 189:21 220:16 221:13 224:17 <b>intention</b> 221:15 <b>intentions</b> 239:25 <b>interactions</b> 213:8 213:13 <b>interceptors</b> 117:2 <b>interest</b> 5:17 6:16 21:25 78:25 92:8 92:9 125:24 161:18 162:4 <b>interested</b> 243:13 <b>interesting</b> 22:22 168:20,22,24,25 175:4 <b>interests</b> 48:13 179:14 198:7 205:6 <b>Interim</b> 4:24 5:13 7:22 83:21 <b>interjections</b> 179:25 <b>internal</b> 8:8,18 30:6 61:6 121:9 121:10 <b>international</b> 22:1 24:9</p>	<p><b>interpret</b> 189:17 <b>interpreted</b> 185:9 <b>interruption</b> 19:22 <b>intervention</b> 22:4 <b>interview</b> 19:15,17 19:21 33:19 50:15 151:15 241:24,25 <b>interviewed</b> 33:20 33:22 54:6 <b>interviews</b> 31:4 52:23 100:3 <b>intimidation</b> 57:3 <b>intolerable</b> 236:3 <b>intricate</b> 161:14 177:8 <b>introduction</b> 110:2 <b>invested</b> 224:3 <b>investigate</b> 11:7 42:5 <b>investigating</b> 43:20 182:9 <b>investigation</b> 10:16,16 14:23 43:3 61:6 72:6 73:11 77:10 100:2 101:16 104:25 105:22 121:9 157:23 161:10 163:16 178:25 179:8 180:16 181:1,6 <b>investigations</b> 25:17 39:24 <b>invitation</b> 82:21 200:1 <b>invite</b> 185:10 <b>invited</b> 125:19 198:20 <b>invites</b> 198:7 <b>invoke</b> 200:16 239:22 <b>invoking</b> 65:3 224:7 <b>involve</b> 34:18 <b>involved</b> 15:17 42:6 57:16 64:25 69:12 87:20 115:7 163:19</p>
---	---	---	---	--

165:4 229:23 <b>involvement</b> 5:9 222:5 233:19 <b>involves</b> 106:13 <b>involving</b> 178:22 <b>issue</b> 18:14 19:2,14 20:23 23:14 30:8 44:13,17 47:25 54:15 55:18 56:9 57:9 60:9,10 64:10 69:8 80:21 90:2 95:1 97:14 119:24 120:8,11 124:5 128:13 133:17 137:15,24 140:1,2 141:10 144:15 145:17 146:10 149:2 152:3 153:10,12 155:6 156:16 160:22,23 162:14 163:4 184:2 192:3,12 201:6 205:9 207:10,21 207:24 210:11 211:1,19 217:4 217:11,15,19 218:7,7 221:8 224:14 228:13 230:11 232:3 240:13 <b>issued</b> 95:18,19 <b>issues</b> 4:18 5:19 7:14 25:8 32:12 32:22 39:18 41:9 47:23 50:9 51:24 57:7 58:17 59:8 60:1,5,20 62:15 64:13 81:6 97:11 97:12,15 106:19 109:13 110:8 111:16 115:2 121:23,25 124:9 132:16,19 136:21 140:4,17 141:14 145:15 147:11,21 149:16 150:23 152:10,23 154:21 157:2,2 165:3	169:5 178:20 180:4,12 182:20 193:8 197:12 214:13 223:19 232:17 <b>item</b> 44:12 <b>items</b> 97:25 <b>iv</b> 100:17 131:9 147:22 <hr/> <b>J</b> <hr/> <b>James</b> 157:19 161:12 168:24 181:8,25 182:5,9 182:11 <b>January</b> 244:1 <b>jawbone</b> 41:23 <b>jeopardy</b> 236:18 <b>Jewish</b> 182:7 <b>JG</b> 51:2 <b>job</b> 46:4 49:14 107:10 217:13 218:5 242:11 <b>jobs</b> 241:18,19,22 <b>Joey</b> 6:14 61:4 121:12 124:18 134:25 142:25 143:6 166:9 172:13 174:12 175:14 177:19 201:20 <b>John</b> 74:10 <b>Joint</b> 24:7 <b>joy</b> 143:16 <b>judgement</b> 49:17 157:18 160:15,23 <b>judgment</b> 14:16 160:25 <b>Judicial</b> 19:11 <b>June</b> 5:1 10:9 41:7 57:6 118:20 144:13 204:16 206:22 207:19 208:10 211:15 216:6 217:2,6 223:12,13 225:4 225:20,22,25 227:17 228:9 229:11 233:9 239:5 242:11	<b>junior</b> 56:21 131:9 <b>jurisdiction</b> 18:15 20:7,17 24:10 25:6 34:18 35:2 <b>jurisdictional</b> 109:13 <b>justice</b> 16:1 20:20 129:25 138:4 139:2 <b>justify</b> 205:22 <hr/> <b>K</b> <hr/> <b>keen</b> 76:5 87:4 102:7 216:23 <b>keep</b> 8:15 13:23 122:17 127:23 130:4 228:18 231:2 <b>keeping</b> 8:23 174:5 185:4 <b>kept</b> 82:22 149:1 174:4 <b>key</b> 98:24 120:8 132:10 192:12 <b>kicking</b> 122:5 <b>killed</b> 137:25 138:10 <b>kindly</b> 73:9 <b>Kingdom</b> 24:15 <b>knew</b> 43:7 64:1 72:20 79:15 81:11 84:7,12,17 84:17 85:12,13 88:24 91:6 92:2 93:13,16 94:5,11 101:22 103:20 120:10 158:14 161:11 162:11,12 171:6 218:1,21 221:21 224:25 <b>knock</b> 81:16 <b>knocked</b> 80:7 <b>know</b> 6:4 18:3,24 21:12 30:1 39:10 39:11 42:20 45:10 49:10,16 53:15,21 54:20 55:1 63:9,13 64:12 65:6,8,12 67:7 69:14 70:1	70:21 78:10,17 78:20,24 79:18 79:22 80:6 81:5 81:13,14 85:2 86:15 87:10 90:24 93:23 94:9 94:21 95:20 102:8 104:3 105:5 114:3,10 118:14,16 119:25 121:21 122:1,7 124:4 125:8,16 125:25 132:4,9 132:19,20,24 134:14 136:17 137:6 142:4 146:10,14 149:21 150:8 153:25 155:10,15 157:3 157:13 158:4,16 159:3 160:6,24 161:3,13 162:8 163:25 164:5,10 164:16 165:18 166:18 167:8,9 169:25 170:16,17 171:3 175:19,19 176:3,18,18 177:6,7 178:12 181:11,14,20 182:7,8 184:22 185:2 186:14 187:7 189:23 190:4,21 195:8 206:12,19 209:4 209:7 217:9 218:17 224:20 226:21 234:19 235:7,13 242:24 243:1 244:22,23 <b>knowing</b> 3:17 70:1 72:15 159:7 163:14 192:17 <b>knowledge</b> 1:21 2:6 77:15 150:3 179:19 <b>known</b> 73:14 105:6 108:16 166:19 181:24	<b>knows</b> 171:20 173:1 181:22 <b>Kram</b> 150:18 <hr/> <b>L</b> <hr/> <b>L</b> 74:20 183:3 <b>L05hrs</b> 74:21 <b>1614</b> 107:16 <b>labour</b> 39:7 <b>lack</b> 57:8 120:8 132:3 154:17 164:10 182:20 <b>lacking</b> 196:5,23 197:3 <b>landed</b> 16:10,24 <b>language</b> 12:13 30:7 52:11,12 124:3 149:20 184:2 234:24 236:10 238:19 <b>laptop</b> 39:21 <b>large</b> 24:17 130:20 <b>largest</b> 96:22 <b>late</b> 135:10 139:2 145:24 223:13 245:9 <b>latest</b> 26:18 <b>Lavarello</b> 50:11 50:13,25 51:4 53:10 <b>Lavarello's</b> 50:21 50:22 <b>law</b> 18:10 88:18 205:6 <b>lawful</b> 24:24 25:16 <b>lawyer</b> 88:12 182:6 229:12 231:10 232:10,15 233:13 235:11,24 <b>lawyer's</b> 144:25 <b>lawyers</b> 11:24 <b>lead</b> 23:15 66:13 143:6 162:18 169:2,9 170:9,15 170:16,24 171:12 <b>Leader</b> 16:5 25:22 <b>leaders</b> 136:17 <b>leadership</b> 9:24 10:14 14:15 23:22 49:12
---	---	--	--	--

55:16 56:23 58:1 61:9 119:6 130:15 133:5 136:24 137:7 138:16 140:3,7 152:16 154:7,18 154:20 167:15 170:19 182:21 214:9 234:21 235:5	<b>lessons</b> 38:19 <b>let's</b> 82:25 122:7 135:1 136:5 143:15 172:18 184:17 <b>letter</b> 10:9,11 24:2 30:4,5 34:16 37:21,21,23 38:3 38:21 116:4 118:20,22 119:12 144:11 148:25 169:23 177:15 191:1 194:4,7,10 194:11 196:8,18 197:10,19 198:12 199:3,5,8,19 200:4 202:4,9 206:23 208:4,6 209:3,6 210:8 212:1,16 225:2,4 225:6,22 226:23 227:17 228:1 233:12 235:10 236:5 239:11,17 240:22 <b>letters</b> 36:19 87:13 169:13 171:2 194:18,21 195:8 195:13,22 198:16 208:1 211:4 225:12,13,15 226:3,11,13 227:7,13 231:24 234:2,9 236:22 <b>letting</b> 65:7,11 <b>level</b> 43:6 48:15 71:5 98:16 103:8 113:12 138:8 148:16 <b>Levy</b> 157:19 161:13 162:5,23 163:17 168:24 176:16,24,25 181:2,8,25 182:5 182:9,11 <b>liaising</b> 170:25 <b>liberty</b> 38:12 <b>lie</b> 158:8 159:10 176:22 190:23	197:7 <b>lied</b> 163:11 <b>Lieutenant</b> 2:14 3:2,9 22:12 <b>life</b> 30:19 31:14 82:6 156:20,21 <b>lifts</b> 37:7 <b>light</b> 39:19 110:24 207:8,25 211:2 <b>lightest</b> 51:20 <b>liked</b> 49:18 125:23 <b>likelihood</b> 153:15 <b>limited</b> 47:2 229:22 <b>line</b> 43:17 48:2 72:6 123:10 147:14 149:19 153:22 169:25 172:9 231:18 234:13 <b>lines</b> 97:19 100:18 116:22,24 143:4 156:9 192:9 205:18 232:18 <b>lining</b> 172:19 173:5 174:15 <b>link</b> 3:4 82:5 <b>linked</b> 153:11 233:20 <b>linking</b> 182:10 <b>links</b> 162:22 163:16 <b>list</b> 209:11 <b>listened</b> 187:12 <b>listening</b> 11:3 <b>listing</b> 51:23 <b>lists</b> 181:19 <b>little</b> 6:7 24:17 34:14 58:19 78:14 80:19 139:20 147:1 149:1 191:17 <b>live</b> 28:23 52:20 212:8 <b>lives</b> 28:24 154:12 <b>Liz</b> 16:4 <b>Llamas</b> 67:17 74:23 88:4 <b>Llamas's</b> 214:24	<b>load</b> 116:14 <b>lobby</b> 228:18 231:1 <b>local</b> 22:1 <b>location</b> 68:15,18 68:24 69:1,16,24 71:8,9 73:1 77:15 80:2 81:1 88:9 90:8 91:4 92:9,16,19 98:16 101:22 105:3 106:2,6,10 108:15,17 111:17 117:24 138:3 155:7 <b>locations</b> 85:1 <b>log</b> 206:9 <b>logical</b> 130:7 <b>London</b> 13:19,25 32:9,10,13,15,23 33:9 72:5 76:6 79:25 84:1 85:20 87:6 90:1 100:19 100:22 101:10 102:7 113:14,18 113:21 114:25 146:8 160:7 169:19 170:12 185:18 210:19 213:21 216:4 218:20 232:19 235:20 <b>long</b> 6:20 25:18 28:19 69:3 87:12 87:12,13,13,14 94:4 135:18 142:1 149:23 159:14 184:22 208:17 <b>longer</b> 29:19 146:5 <b>look</b> 5:25 6:2 10:10 14:10 32:22 43:11 50:19 75:23 78:7 82:12 87:24 92:12 96:16 107:13 108:20 110:12 116:17 129:11,15 130:11	133:12 134:19 142:17,21 154:2 156:8 166:3 173:4 177:10,15 184:18 195:24 196:17 197:20,22 203:7 204:14,16 209:21 225:16 226:14 227:16 237:20 <b>looked</b> 23:16 49:12 115:10,18 118:21 147:1,3 148:9 181:15 211:22 215:21 <b>looking</b> 35:15 43:12 58:10 66:16 71:25 98:13 99:13 101:3 107:23 113:5 115:16 132:4 137:16 145:25 151:16 173:11 178:2 183:7 196:7 202:15 209:9,25 211:19 214:16,22 234:20 242:21 <b>looks</b> 114:7 199:12 199:22 208:8 226:2 <b>loose</b> 53:2 84:22 102:13 <b>lose</b> 10:6 51:24 57:13 66:11,14 137:2,13,20 148:7 192:13 <b>losing</b> 137:16 186:11 191:16 <b>loss</b> 9:21,23 11:9 11:12 23:11,12 23:16 55:12 124:23 132:17 153:5 154:12 156:3,20,20 159:17,24 160:2 160:3 162:18 168:4 176:21 184:21 189:13
--	--	---	---	--



198:2 223:6,8 224:25 <b>losses</b> 122:25 <b>lost</b> 168:1 172:24 177:20 179:1 186:13 <b>lot</b> 21:25 29:19 46:10 48:14 77:24 110:4 115:6 125:8,8 132:19,22,25 133:7 172:12 <b>lots</b> 52:10 129:4 <b>lower</b> 24:17 143:12 147:2 <b>lunch</b> 142:7,8 146:1	<b>manner</b> 16:16 19:3,6 25:8 130:22 156:21 <b>mannerism</b> 155:12 <b>manoeuvred</b> 165:7 <b>map</b> 74:19 75:5,9 75:13,15 103:14 138:23 141:1,17 <b>March</b> 4:13 11:19 15:23 24:3 25:19 26:14 27:16,19 29:11 41:20 64:19,21 66:18 72:1 73:20 74:11 75:17 76:9 77:14 82:13 90:6 92:15 93:3 100:22,24 100:25 101:2,7,9 101:14 102:3 103:24 105:20 107:17 108:23 109:3 110:17,23 110:24 112:3 117:9 118:13 119:1,10 150:18 153:21 155:2 243:23 <b>March-April</b> 243:24 <b>marine</b> 155:20 <b>maritime</b> 107:21 196:24 <b>mark</b> 182:4,13 <b>marked</b> 1:12 202:11 <b>marking</b> 53:1 <b>marred</b> 217:3 <b>Mars</b> 30:20 31:14 82:6 <b>Marshal</b> 16:8 <b>Marshall</b> 16:6,21 <b>massive</b> 93:22 <b>massively</b> 55:20 93:25 <b>match</b> 117:10 <b>material</b> 24:14 <b>matter</b> 21:9,11,19 34:15 44:4 53:14 70:22 88:13	103:2 104:5,6,22 104:25 105:3 126:21 127:15 133:21 137:3 146:23 147:16 157:25 158:3 165:10 171:18 191:19 192:12,19 205:16 210:13 216:25 217:8 227:22 229:16 233:19 238:6 <b>matters</b> 7:25 8:17 9:3 10:2 36:6 59:14 63:23 88:18 92:20 119:17 135:23 137:15 143:19 145:23 149:7 159:16,22 160:1 164:14 211:14,22 226:1 <b>McGrail</b> 9:22 10:6 14:17 15:14 16:18 22:9,10 23:6 25:25 31:8 31:12 37:15 40:14 41:5,14 42:15,21 43:7,18 44:1,13 46:18 49:7,8,11,17,22 50:12,13 54:6,8 54:17 57:1,3,7,11 57:17 58:6,11 59:9,24 64:7,21 64:23 65:18 66:20,22 67:8 68:17 69:15,23 71:18,20 72:20 72:25 73:17 76:1 76:11 79:17,20 80:10,25 84:4 86:24 87:7 88:4 89:9,16,22 90:7,7 90:9,11,19,25 91:6,17 92:14,17 93:1,2,10,15,19 94:4,12,18,21 95:2 97:4 98:6	101:13,18 102:4 102:10 103:6,19 104:9,17 105:18 108:7,14 111:15 111:17 119:9 120:14 125:2,18 127:3,14 129:17 132:12 136:11 137:2 139:1 141:13,16 142:18 143:8,24 146:2,5 148:13 153:20 154:21,25 155:5 156:2 157:17 158:2,24 159:11 160:11,14,16,18 166:14 167:19 169:14 173:7,25 174:20 177:4 180:21,22 185:11 186:19 187:13 190:24 191:17 193:10,16 195:14 195:17 197:2,7 197:12,14 200:20 205:13 207:9 220:23 221:6 223:11,12 224:12 224:24 225:14 226:3,8,13,24 227:5,18 228:7 231:10 232:7,9 232:21 233:5 235:7,21 236:2,8 238:6,17 239:7,9 240:9 <b>McGrail'</b> 62:18 131:19 <b>McGrail's</b> 9:23 12:6 17:17 21:4 30:13 31:7 42:16 47:7 48:24 55:15 56:16 68:22 70:5 101:15 107:15 174:7 224:5 232:15 233:8 235:17 237:10 238:4 239:2 240:14	<b>meal</b> 79:23 <b>mean</b> 14:4 27:8 35:3 37:5 39:1 43:6 52:22 69:25 70:20 79:6,11 87:19 89:15 105:7 123:6,12 123:24 125:10 128:10 141:24 144:6 166:16 168:2 171:19 174:13 175:5 176:7 185:1 186:10 194:9 207:11 221:1,14 224:17 240:21 244:13 <b>meaning</b> 53:13,15 171:9 <b>means</b> 98:11 140:16 228:15 230:24 <b>meant</b> 7:17 63:3 78:15 104:6 106:5 113:15 <b>mechanism</b> 60:23 <b>med</b> 58:22 <b>media</b> 11:1,1 12:14 22:1 45:18 45:18 46:2,2 58:15 82:23 125:17 207:25 211:2,7 232:5 <b>medical</b> 242:1,4,15 <b>meet</b> 33:16 63:5 77:22,23 89:13 109:8 111:9 136:2,14 147:17 152:16 157:25 197:9 199:15 225:14,25 <b>meeting</b> 5:16,20 22:25 33:24,25 34:1,22 37:14 46:24 48:21 61:9 61:13 62:19 63:13,14,16,21 64:1 66:21,24 67:14 69:3 71:11
<b>M</b>				
<b>MacGrail</b> 148:3 <b>Machiavellian</b> 94:12 <b>Madrid</b> 32:14 71:2 113:14 114:1,4 <b>magnitude</b> 93:17 <b>main</b> 42:12 81:5 176:20 <b>maintain</b> 17:24 20:20 25:24 57:21 200:7 <b>maintaining</b> 6:16 <b>major</b> 65:24 76:17 <b>making</b> 53:19 107:10 123:22 167:17 171:7 182:1 195:11 <b>manage</b> 167:9 <b>managed</b> 84:22 95:22 <b>management</b> 14:15 24:15 50:3 51:25 56:17 57:8 60:19 65:5 130:16 131:19 133:5,9 136:18 147:15 182:21 <b>managers</b> 131:3 <b>manifested</b> 150:22 <b>manipulated</b> 164:20 165:6				

76:7,16 79:9 85:17 90:11 91:25 97:25 98:2 98:17 99:15 105:11 109:25 114:11,22 115:3 115:7 122:23 123:7 139:5 154:4 157:1 158:2,20,23 159:1 165:8 167:12 168:7,10 172:4 175:14,18 176:11 177:2 179:21,24 180:10 182:15 189:18 190:14 191:9,11 191:14,20,21,25 192:19,22,24 193:23 194:3 197:13 201:19,22 202:2 208:9,21 209:21 213:19 218:23 220:8,19 222:17 223:11,17 223:19 224:19 225:21 227:23 229:3 230:3 232:11,21 233:10 235:17,18 237:11 <b>meetings</b> 6:23 7:16 7:21 9:2 44:9 57:2 58:23 60:16 63:17 165:14 177:8 192:2 <b>member</b> 5:3 41:21 46:23 54:5,7 62:7,17 <b>members</b> 6:19 15:24 47:5 49:24 51:15 52:14 84:10 192:10 209:10,13 <b>memorable</b> 207:7 <b>memory</b> 63:10 80:6 82:4 83:7 97:3,10 109:7,14 122:5 152:11 158:22 175:6	180:2,23 226:7 240:5 <b>mental</b> 236:16 <b>mention</b> 33:6 158:20,23 159:16 160:12 179:16 <b>mentioned</b> 22:25 54:11 57:20 71:10,15 85:9 129:1 158:15 181:11 214:13 222:15 <b>mentioning</b> 83:8 150:11 <b>mentions</b> 113:24 <b>merely</b> 220:17 239:11 <b>merits</b> 229:3 <b>mess</b> 210:19 <b>message</b> 51:20,22 51:23 71:3 72:3 72:17 73:7 75:24 76:1,24,25 86:25 87:7,16 102:2,4 102:20 113:20 121:18 122:9 135:6 143:23 147:5 148:11 149:24 152:6 157:23 170:11 206:8 217:18 239:21 <b>messages</b> 72:1 87:12 172:5 201:17 237:9 <b>messaging</b> 240:15 <b>met</b> 17:4 73:8 89:10 90:6 101:16 102:6 120:21 121:5 122:24 126:6 139:17 151:23 152:22 154:3 176:16,25 178:14 193:17 214:19 216:5,8 230:5 232:7 <b>methodology</b> 14:8 31:1 33:18 35:18	53:1 <b>Metropolitan</b> 105:1 108:25 <b>Miami</b> 78:9 82:2,5 82:11 173:17 <b>Michael</b> 27:20 67:17 78:8,11 85:17 105:5 207:19 213:22 222:14 <b>Michael's</b> 27:21 78:12 <b>microphone</b> 6:7 <b>mid</b> 150:19 <b>mid-afternoon</b> 202:17 <b>mid-morning</b> 73:22 <b>midday</b> 66:18 201:20 227:24 <b>middle</b> 29:22 144:14 <b>Mike</b> 16:13 <b>mile</b> 70:23 <b>miles</b> 70:23,23 74:17 79:3 82:17 85:25 91:7 92:5 92:6 109:2 110:20 111:14 112:8 113:1 120:5 138:2 <b>military</b> 18:17 22:7 <b>mind</b> 4:19 23:15 42:11 63:4 70:15 72:20 80:11 101:25 137:6 138:14 146:15 149:6 150:7,10 150:12 151:11,16 151:18 152:25 159:13 162:8,20 165:6 168:11 176:4 185:2,24 187:18 190:2,18 194:14 202:11 215:22 221:18,22 224:2 <b>mind?'</b> 156:11	<b>mindful</b> 223:2 <b>mindful</b> 183:8 <b>minds</b> 121:6 231:16 <b>mindset</b> 99:3 <b>mine</b> 13:22 172:18 226:10 <b>mined</b> 100:10 <b>mining</b> 100:4,15 <b>minister</b> 3:15 8:15 8:23 9:1,5 19:19 19:24 20:9,15,25 26:16,17,20,25 27:17 28:15 29:2 29:23 30:2,6,8,15 30:24 32:25 33:1 33:15 37:24 46:21 53:23 54:2 77:2 83:24 84:6 93:1 106:1,5 111:21 115:14 120:3 121:3,20 121:22 122:17 123:24 126:9,16 127:11,16,21 128:2,4,9,19 129:6,25,25 133:21 137:10 138:14 139:2,9 142:3 143:11 146:22 147:5 148:12,18,20 149:13 150:11 152:2 154:5 156:14 157:10,16 157:21,24 158:9 158:10,14 159:5 159:8 160:8,19 161:8 162:3,7,19 162:24 163:8,9 163:14 164:9,20 165:13,15 166:5 167:4 169:8,15 170:9 171:4,11 171:19 172:1,5 172:24 173:21,24 176:12,16,21 177:3,6 178:2,15 178:19,25 179:7	180:1,3,20 181:23,25 184:19 186:3,11 187:1 187:11 189:2,5 189:12 190:13 191:3,16,22 192:13,18 193:15 194:6,19,20 195:9,25 196:4 196:21 197:25 201:17,19 204:16 204:17,23 205:2 207:12 208:2 212:8 213:7 214:4,12 216:5,9 216:23 218:16 220:9,12 223:7 225:9,24 229:4 230:4,17 232:19 238:4,15 <b>minister's</b> 20:5 29:10 33:16 51:18 106:24 144:8 150:7,10 161:12 162:22 164:1 166:25 182:17 223:5 231:14 238:11,13 <b>ministerial</b> 71:5 <b>ministers</b> 170:2 <b>minor</b> 167:23 <b>minority</b> 131:3 <b>Minster</b> 200:23 <b>minute</b> 35:24 98:21 142:5 <b>minutes</b> 17:21 19:21 33:24 69:6 110:3 166:6 240:10 241:12 245:7 <b>mirrored</b> 155:12 <b>mishandled</b> 147:25 <b>mishandling</b> 178:24 180:15 <b>misled</b> 89:24 154:21 157:21 158:7 160:11,18 177:6 191:6
---	---	--	--	---

<b>mismanagement</b> 144:20	221:20 223:25 224:7 225:14	<b>N</b> 74:16	195:17 219:9 230:6,13 243:10	<b>Nic</b> 102:10 110:14
<b>missed</b> 12:25 155:22	226:5 227:7,12 227:23 228:2	<b>Nagrani</b> 34:6 35:8 35:9	<b>needing</b> 176:3 177:7	<b>Nicholas</b> 1:6 73:25 74:2 109:8 203:3 245:23,25
<b>missing</b> 37:22	232:8	<b>name</b> 67:11,17 182:13 208:17	<b>needs</b> 140:7,9	<b>Nick</b> 1:5 11:24 46:22 64:23
<b>missive</b> 141:25	<b>monitoring</b> 169:6	<b>named</b> 84:11	<b>negative</b> 83:2	65:11 135:2 143:13 166:12 170:13 175:16 217:7 239:20
<b>mistaken</b> 50:25	<b>months</b> 14:20	<b>narrative</b> 95:10 157:5	<b>negotiated</b> 219:20 229:9	<b>night</b> 76:2 78:5 79:1 81:21 85:11 87:2 103:4 142:1 174:4 185:5
<b>misunderstanding</b> 60:13	29:21 40:1 41:12	<b>nationals</b> 72:7 77:9	<b>negotiation</b> 229:17	<b>night'</b> 68:22
<b>mobile</b> 67:18	95:13,16 126:1 144:18 147:17	<b>natural</b> 91:20	<b>negotiations</b> 69:10 76:13 77:25 81:1	<b>nine</b> 239:20
<b>MoD</b> 14:25 15:7 15:24 18:5 20:3 20:7 22:3 26:3 26:10 27:22 29:17 30:18 31:4 31:15,18 33:20 34:19 35:1,6,11 36:14,18 38:14 38:18 40:1,7,7 42:4,8 82:7 84:16 86:18 110:11 147:25	149:15 150:16 152:18 156:18 157:3 241:17,21 242:2	<b>naturally</b> 15:2 238:18	81:2,13 89:14 95:2 106:19 121:25 126:12	<b>NMH</b> 66:18 90:7
<b>MOD/UK</b> 18:14	<b>moped</b> 67:2	<b>nature</b> 12:18,19 15:4 25:17 92:18 108:11	<b>Neish</b> 245:6,8,14 245:19	<b>nobody's</b> 19:17
<b>modernisation</b> 241:1	<b>morale</b> 56:21	<b>nautical</b> 79:3 91:7 92:5,6 112:8 113:1 120:5	<b>neither</b> 175:7 187:8 214:21 215:1,23	<b>noise</b> 145:14
<b>modernise</b> 64:5 140:10 149:23	<b>Morello</b> 59:2,10 59:16,21 62:23 63:12,15	<b>nearly</b> 18:12	<b>nervous</b> 169:1,22 171:12	<b>nonsense</b> 27:23
<b>modernised</b> 136:23	<b>Morello's</b> 59:3 60:25	<b>necessarily</b> 21:21 143:2 233:20	<b>neutral</b> 236:9	<b>normally</b> 85:18 94:8 214:6
<b>Mole</b> 21:3 66:17 77:5	<b>morning</b> 1:3,8,9 20:13 64:20,22 75:24 76:2,5 79:25 82:14 83:7 83:13,14,16 84:1 84:15 85:14 87:1 87:4 96:20 142:3 153:18 155:17 172:4,17 209:3 217:12 226:4 227:7,12 232:8 240:17	<b>need</b> 13:6 28:6 34:14 39:11 40:15 61:18 65:9 69:13 70:6 79:16 84:25 123:25 139:15 141:22 167:9 171:19 172:2,12 174:12 183:5 184:6 187:14,14,15 195:21 200:3 201:13 207:23 211:1 226:21 231:4 240:16	<b>never</b> 9:14 22:23 42:1 77:3 94:6 162:7,20,20 221:9	<b>North</b> 77:9 161:19 161:24 163:16 179:14
<b>moment</b> 28:20 67:23 69:14 70:9 73:22 91:3 97:2 97:5,19,20 105:15 122:6 155:16,23 165:23 183:21 201:8 217:10 218:3,21 226:12 242:16	<b>motion</b> 66:10	<b>neck</b> 138:19	<b>nevertheless</b> 11:7 15:13 17:24 20:21 23:10 25:24 45:13 57:10 82:1 224:15 244:11	<b>note</b> 7:10 12:20 13:5,25,25 14:1 30:6 67:14 72:5 73:20 81:10 88:3 97:24 99:15,21 99:22 109:4 113:6,7,24 114:9 114:16,20 190:13 190:16 197:17 223:15,23 232:25 233:3 236:1 237:3 245:4
<b>moment'</b> 155:11	<b>motivation</b> 71:17	<b>need</b> 13:6 28:6 34:14 39:11 40:15 61:18 65:9 69:13 70:6 79:16 84:25 123:25 139:15 141:22 167:9 171:19 172:2,12 174:12 183:5 184:6 187:14,14,15 195:21 200:3 201:13 207:23 211:1 226:21 231:4 240:16	224:15 244:11	99:22 109:4 113:6,7,24 114:9 114:16,20 190:13 190:16 197:17 223:15,23 232:25 233:3 236:1 237:3 245:4
<b>moment.'</b> 94:22	<b>move</b> 1:23 6:6,9,11 9:2 46:13 56:11 73:19 129:9 230:2 240:6	<b>needed</b> 48:10 60:18 64:5 66:9 72:11 76:11 81:15 85:1 89:21 117:23 118:1 122:4 126:10 136:22 137:8 149:22 154:9	225:25 217:1 223:17 229:17 231:8	<b>notebook</b> 33:11,12 53:8
<b>moments</b> 207:7	<b>moved</b> 54:14 55:1 151:13		<b>new</b> 21:3 66:17 77:5,7 102:2 108:7 138:24 205:21 209:9,13 215:25 217:1 223:17 229:17 231:8	<b>Noted</b> 143:15
<b>monarch</b> 28:12	<b>movement</b> 240:19		<b>newest</b> 64:11	<b>notes</b> 13:13,20,21 13:22 14:3,5,6
<b>Monday</b> 71:11,13 79:21,24 105:11 114:5 115:3 120:21 172:14 175:15 218:22	<b>moving</b> 55:2 64:18 75:17 204:12 223:21		<b>newly</b> 145:7,9	<b>noteworthy</b> 79:18
	<b>mutually</b> 3:10 128:7		<b>newly-constituted</b> 215:2	<b>notice</b> 124:22 152:21 180:5 183:19 227:11 234:6 242:6
	<b>N</b>		<b>news</b> 76:17 105:25 109:24 123:13 228:12	<b>notices</b> 60:1 61:3
			<b>newspaper</b> 44:7	<b>notifying</b> 155:20
			<b>newspapers</b> 11:2 29:8 151:1	

<b>noting</b> 217:23	147:11 150:5,17	22:8 24:22 25:4	197:6 214:20	<b>outline</b> 134:18
<b>notwithstanding</b> 51:5 85:16	151:17 157:6	25:13,15 38:5	222:24 223:3	<b>outlined</b> 154:10
<b>November</b> 4:5,8	<b>occasion</b> 108:3	47:2,3,12,13	<b>operational</b> 18:22	157:16 200:24
<b>now'</b> 61:18	170:21	56:21 94:20	110:10	<b>outpouring</b> 157:12
<b>NP</b> 16:21 21:9,11	<b>occasionally</b> 5:15	106:22 130:20,21	<b>opinion</b> 31:2 55:21	157:12
21:19,19 34:9	9:2 59:11 60:6	131:9,10 147:13	64:14 78:3 81:6	<b>outright</b> 238:23
107:17 234:5	63:6 130:15	<b>offices</b> 61:10	89:6 132:9	<b>outset</b> 153:14
236:20 239:21	138:7	<b>officials</b> 12:5	168:13 182:22	181:21 198:25
<b>NP's</b> 21:22 233:9	<b>occasioned</b> 147:18	31:19 35:11	220:5 243:8	<b>outside</b> 31:25 62:3
239:25	<b>occasions</b> 30:13	36:18 107:21	<b>opportunity</b> 54:7	68:19 69:7,11
<b>NPI/141</b> 100:23	46:10 63:24	<b>offloading</b> 159:5	93:15 126:22	73:15 77:12 83:9
<b>NPI/142</b> 100:24	170:20	<b>Oh</b> 198:17 235:2	166:15 170:13	92:9,10 95:17
<b>nudge</b> 143:22	<b>occur</b> 102:16	<b>ok</b> 65:10 72:15	173:7	102:8 103:1
<b>null</b> 208:25	103:1 162:1	<b>okay</b> 6:11 13:3,12	<b>opposed</b> 101:8	104:4,8,24
<b>number</b> 10:1	<b>occurred</b> 62:20	56:10 74:1 83:17	<b>opposite</b> 17:8	105:24 108:2,5
51:23 63:24	68:16 77:11 93:6	96:2,7 142:10	18:18 51:16	117:5 119:17
67:18 130:17,20	119:25 120:2,4,5	169:21 184:17	77:13 174:2	120:4,7 147:19
138:2 208:16	121:21 144:17	196:15 245:21	<b>optic</b> 244:21	155:4 173:4
<b>numerous</b> 30:13	150:18 156:1	<b>old</b> 50:10	<b>opting</b> 21:20	243:18
45:3,7,17,18	<b>occurring</b> 105:24	<b>omit</b> 6:20	<b>option</b> 166:8,13,16	<b>overlap</b> 233:22
46:10 57:7 60:16	108:2 191:4	<b>once</b> 28:5 39:6	166:23 189:10	<b>overlapped</b> 233:24
71:21 81:9	<b>October</b> 50:23	70:21 108:14	198:4 206:14	<b>overplay</b> 125:7
144:19 154:25	242:20	109:10 114:9	212:22 216:1	<b>overseas</b> 47:21
<b>NV</b> 111:24 113:6	<b>odd</b> 244:17	118:21 186:25	221:17 227:20	173:15 175:9
115:25	<b>odds</b> 216:14	190:3 219:15	229:5,6,9,10,25	241:18 242:5,21
	<b>off-kilter</b> 81:16	<b>ones</b> 118:4	236:14	<b>Oversees</b> 241:19
	<b>offence</b> 225:8	<b>ongoing</b> 60:2 61:6	<b>options</b> 33:1 93:21	<b>oversight</b> 71:22
	233:14	72:6 73:12 76:14	173:13 177:22	93:16,22,25 97:1
<b>O</b>	<b>offences</b> 62:6,7	157:22 178:24	205:19 215:21	97:13 171:18
<b>o'clock</b> 83:14	<b>offer</b> 5:18 236:10	179:8 180:16	229:2,2	228:5,6
111:23 199:7	238:2 243:4	181:6 217:4	<b>oral</b> 59:13 107:9	<b>ownership</b> 161:15
245:21	<b>offered</b> 6:22	<b>Oops</b> 20:14	<b>order</b> 34:21 49:17	
<b>oath</b> 28:13 219:16	244:19	<b>Op</b> 10:16	57:10 60:18 67:6	<b>P</b>
220:6 244:14	<b>office</b> 2:9 4:25	<b>open</b> 7:17 47:11	198:10 205:7	<b>p.m</b> 227:7 235:17
<b>OBE</b> 1:5	12:12 13:16 20:2	91:16 135:20	<b>orders</b> 15:10 117:3	235:18
<b>objection</b> 7:1	20:5,5 30:17	148:21,22 226:24	<b>ordinates</b> 74:15,19	<b>PA's</b> 48:15
46:20	32:19 37:3 63:15	242:22	74:25	<b>package</b> 231:7
<b>objections</b> 34:23	75:10 83:12 85:9	<b>opened</b> 47:3 53:12	<b>organisation</b> 40:19	<b>page</b> 1:17 2:2
<b>objective</b> 50:10	110:1 120:9	243:11	40:22,24 133:2	10:10,11 14:1
<b>obligation</b> 127:22	134:4 135:8,10	<b>opening</b> 111:11	<b>organisations</b>	21:8 24:16 26:14
<b>Obs</b> 96:25	149:18 226:8	203:19	25:19 47:19	37:20 38:2 59:7
<b>obtained</b> 12:3	230:8 233:10,11	<b>operate</b> 94:8	<b>ought</b> 38:17	74:12 75:25
73:17 74:14	238:11,12,13	<b>operated</b> 7:19	<b>ounce</b> 67:10	76:23 88:2 102:3
91:22 118:6	241:19 242:3,14	55:17 170:7	<b>out'</b> 69:23 70:2	105:17,21 106:1
<b>obvious</b> 45:2 81:3	243:17	<b>operates</b> 7:3	80:11 155:7	107:14 112:2,7
81:18 193:18	<b>officer</b> 16:25 40:3	<b>Operating</b> 94:23	<b>outcome</b> 26:21	113:5 115:21
234:19	110:6 147:20	<b>operation</b> 86:12	27:7 184:19	116:3,18,19,22
<b>obviously</b> 4:20	<b>officers</b> 15:9 17:5	158:1,13,15,16	185:22 186:16	118:24 144:14
7:14 8:2 36:13	17:9,15 21:2	158:17 190:23	207:2	196:8,10,11
50:1 70:6 79:15				199:8 203:16
108:12 141:25				

204:17,19,20,22 211:5 233:7 <b>pair</b> 217:16 <b>Pakistan</b> 241:23 <b>pandemic</b> 23:24 <b>panel</b> 49:24,25 50:15,17 54:5,7 <b>panorama</b> 44:10 205:10 <b>Paolo</b> 222:6 <b>papers</b> 221:7 223:22 227:21 <b>para</b> 50:22 <b>paragraph</b> 9:16,20 10:13 11:23 14:11 16:20,20 17:18 21:5,7 24:6,18 28:14 29:23 30:10 38:2 39:17 41:17 43:12 44:22 46:15 50:20 59:17,21 66:4 74:11 76:8 87:25 90:5 92:12 94:13 96:22 100:17 103:25 105:4,21 106:8 107:14,15 109:6 115:24 116:23 118:24 133:13 139:12 141:8,9 144:14 151:24 177:10,25 178:17 204:13 212:1 214:23 216:8,22 220:11 227:21 231:19 234:12 237:17 <b>paragraphs</b> 106:25 154:3 239:2 <b>parallel</b> 126:13 <b>park</b> 41:9 50:9 <b>parked</b> 151:12,14 <b>Parliament</b> 28:11 240:1 <b>part</b> 17:19 36:14 36:17 38:20 60:21 69:7 78:18	93:17 94:15 95:9 122:6 131:22 145:14 159:18 181:5 182:10 193:4 210:15 222:17 <b>participate</b> 163:1 <b>participation</b> 50:5 <b>particular</b> 9:13 24:16 25:10 30:12 64:7 68:23 119:23 132:2 141:4 144:19 147:16 157:25 193:3 200:23 <b>particularly</b> 120:9 131:22 218:2 <b>particulars</b> 234:6 <b>parties</b> 31:8 57:15 <b>partly</b> 126:8,9 132:15 231:14 232:12 <b>partner</b> 162:10,12 162:17 <b>partnership</b> 170:4 <b>parts</b> 147:25 194:21 195:24,25 <b>pass</b> 26:22 89:18 169:14 <b>passages</b> 24:5 <b>passed</b> 118:2 152:18,20 226:18 <b>passengers</b> 17:4 <b>passing</b> 63:14 88:7 <b>pattern</b> 23:18 57:11 <b>Paul</b> 74:14,22 <b>pause</b> 41:17 125:14 126:14 130:12 163:2 169:14 190:19 212:19,21 <b>paused</b> 61:21 <b>pausing</b> 130:8 155:14 <b>pay</b> 237:5 <b>PC</b> 109:7 <b>peace</b> 205:6 <b>peers</b> 131:3	<b>peg</b> 121:11 123:11 123:21 <b>pen</b> 111:4 <b>penholders</b> 134:4 <b>pension</b> 236:19 239:12 <b>penultimate</b> 24:6 110:17 <b>people</b> 11:2 18:3 18:17 28:18 29:2 30:18 31:10,15 32:15 45:9,21 46:11 47:25 53:15 55:1 84:13 86:20 90:15 98:12 112:17 115:5 137:25 146:17 164:25 <b>perceived</b> 131:9 209:14 <b>percentages</b> 170:18 <b>perception</b> 130:19 162:2 222:4 244:18 <b>perfectly</b> 197:14 <b>perform</b> 203:11,22 215:3,9 <b>period</b> 3:19 5:12 9:25 14:24 95:15 159:14 174:17 236:21 <b>periods</b> 3:23 <b>Permanent</b> 217:23 <b>permission</b> 243:18 243:22 <b>permit</b> 9:5 <b>permitted</b> 9:11 17:11 <b>person</b> 48:10 49:14 55:19 72:8 109:23 112:22 168:21 173:15 181:1,7 200:22 201:25 217:11 222:15,17 235:22 <b>personal</b> 26:22 237:1 <b>personally</b> 51:7	197:4 <b>personnel</b> 24:20 25:12 38:14 <b>persons</b> 61:23 <b>perspective</b> 70:11 150:15 <b>persuade</b> 9:12 <b>persuaded</b> 230:17 <b>persuasive</b> 183:6 184:7,24 216:17 <b>pertaining</b> 111:16 <b>pervert</b> 16:1 <b>perverted</b> 20:19 <b>petty</b> 28:24 <b>Phil</b> 110:1,5 <b>Philip</b> 217:24 218:2 <b>phone</b> 19:16 39:22 61:4 86:14 107:24 108:11 <b>phones</b> 100:4 <b>photograph</b> 112:2 115:20 116:3,18 116:20 118:12 <b>phrase</b> 130:14 <b>phrases</b> 159:9 <b>pick</b> 21:6 68:3 100:17 168:17 <b>picked</b> 49:23 113:13 144:21 145:13 213:4 218:20 <b>picking</b> 94:14 116:22,23 139:12 220:10 <b>picture</b> 66:25 151:21 192:20 <b>piece</b> 205:21 <b>pieces</b> 151:17 <b>pillow</b> 172:7 <b>pilot</b> 41:19,21,23 43:21 46:5 54:10 54:23 55:8 56:1 <b>pithy</b> 87:11 <b>pivotal</b> 97:16 <b>place</b> 24:8 28:22 38:13 59:19,23 62:2 72:9,21 73:14 75:1 86:22	102:7,12 104:4 108:4,6 111:25 112:6,14 116:1 117:5 138:2 153:3 154:24 155:4 160:20 171:4 180:11 233:16 <b>plan</b> 220:10 <b>plane</b> 15:21 17:20 17:22 28:21 <b>planning</b> 65:4 197:11 206:13 <b>plans</b> 148:12 <b>plate</b> 109:22 210:16 217:10 <b>play</b> 23:8 129:21 129:23 183:14,25 188:4 <b>Playa</b> 74:17 <b>played</b> 23:7 185:23 187:17 190:1 <b>players</b> 3:18 <b>please</b> 1:15,17,24 2:1,2,17 9:15 10:8 14:10,24 21:5 24:1 26:13 27:15 30:9 33:23 37:19 39:17 43:11 51:17 61:18 64:19 67:13 71:23 73:5 74:9 75:6 76:6 81:25 87:6,23,25 90:18 96:17 97:23 100:16 101:12 107:13 111:20 116:17 118:19 120:22 126:14,19 129:10 133:13 134:19 138:18 139:8 142:17 146:25 147:2 166:3 168:18 172:3 175:1 176:9 180:8 190:12 197:22 199:4
---	--	--	--	---

<p>200:14 201:16 204:14,23 207:16 211:25 213:11 220:7 225:16 227:16,23 239:1 <b>plethora</b> 150:25 <b>plot</b> 86:5 <b>plotted</b> 74:19 102:16 <b>plotted/</b> 75:2 <b>plotting</b> 84:23 <b>PMB</b> 86:15 <b>point</b> 7:20 13:23 15:17 22:15 26:24 33:10 36:4 39:6 40:23,25 45:25 49:9 56:8 58:11 60:10 61:2 61:23 62:16 66:6 69:8 83:25 89:21 91:4,5 97:12 98:4,20,25 99:3 102:22,25 104:14 110:14,18 112:9 112:12,18,22 117:18 119:11 125:22 128:3 134:12 137:1 141:12,21,22 144:15 156:18,20 160:6,10 171:16 171:22 176:7 179:10,13 181:4 182:11 185:1 191:24 192:25 193:4 196:25 197:1,17 204:6 206:7 207:14,14 209:9 214:6 215:20 218:14 219:18 221:14 235:6 238:19 241:2 244:5 <b>pointed</b> 108:1 135:8 <b>points</b> 40:19 56:12 84:25 105:23 113:22 114:6 160:13 187:14</p>	<p>203:6 <b>police</b> 5:4 8:7,8,18 8:22 14:17,23 15:11 19:10 21:1 24:23 25:13 26:6 26:11,23 27:17 29:3 30:14 34:7 34:8,9,20 37:14 44:15,25 46:18 47:1,3,19 55:5 56:12,15,19,23 57:18 58:2,22 60:17 62:3 66:13 72:4,10 73:9 76:25 84:11 96:20 98:3 101:17 102:21,23 102:25 103:10,21 105:1 106:13,14 106:16,22 108:25 117:1 124:24 126:20 127:23 131:16 134:3 138:25 146:6 147:20 163:11 167:20 172:25 173:16 174:18 175:10 176:1,4 178:22 179:5 180:14 186:14 198:6,21 199:10 199:13,24 200:19 200:21 205:13 207:22 208:21,23 209:2,16,20 212:4 215:4,6,11 220:18 <b>Police's</b> 115:13,21 116:4 199:9 <b>Police?'</b> 61:16,21 <b>policing</b> 9:3 38:10 198:1,8 201:6 203:15 <b>policy</b> 12:9 32:19 <b>political</b> 68:11 119:3,7 124:11 147:12 154:14 <b>political-</b> 153:23 <b>poor</b> 56:21</p>	<p><b>pop</b> 67:6 205:20 <b>population</b> 135:25 <b>poring</b> 86:13 <b>port</b> 84:16 85:11 <b>Portuguese</b> 72:8 72:13 <b>posed</b> 154:25 205:11 <b>position</b> 20:3,6 21:18 22:20 27:23 47:18 49:14 50:17 72:14,23,24 81:17 160:10 162:25 163:19,23 182:17 186:25 187:2 208:23 214:25 216:11 218:24 221:9 228:18 231:2,4 <b>positions</b> 21:14 <b>positive</b> 27:4 41:15 <b>possession</b> 223:22 <b>possessions</b> 242:8 <b>possibility</b> 68:10 187:9,20 231:25 <b>possible</b> 38:25 45:13 90:18 126:10 142:25 192:6 211:8 217:1 222:8 <b>possibly</b> 11:13 21:17 69:5 95:14 109:2 110:20 111:14 125:25 143:1 169:25 184:1 192:2 224:17 232:12 <b>post</b> 132:14 <b>post-incident</b> 65:4 <b>posted</b> 130:4 241:19 <b>potential</b> 144:22 145:3,10,18 153:19 222:22 <b>power</b> 3:5 122:18 186:23 189:24 200:18 203:13 204:2 215:11,11</p>	<p>215:14,20 <b>powers</b> 126:25 127:25 179:3 180:7 183:2,13 183:23 184:12,14 188:3 198:4 199:13,23 203:8 203:9,20 215:7 215:19 216:13,16 219:10 224:3,8 224:22 239:22 <b>PR</b> 77:10 <b>practice</b> 2:20 14:7 45:4,16 65:22 95:5 <b>pre-empt</b> 187:7 <b>pre-emptive</b> 194:5 <b>pre-judge</b> 183:7 <b>preceded</b> 161:1 <b>preceding</b> 115:15 <b>precise</b> 87:12 90:18 103:18 117:24 241:5 <b>preclude</b> 7:2 <b>precluded</b> 63:16 192:23 <b>predecessor</b> 21:12 <b>predisposition</b> 49:22 <b>prefer</b> 5:25 <b>preference</b> 53:23 121:13 126:5 220:21 221:2 <b>preferred</b> 53:21 54:3 207:22 210:25 229:25 238:1 <b>prejudge</b> 47:8 177:16 187:7 <b>prejudging</b> 173:18 <b>preliminary</b> 175:9 176:13 <b>preoccupations</b> 140:20 <b>prepared</b> 92:25 99:14 180:6 190:13 212:15 216:20 224:4,21 224:21</p>	<p><b>preparing</b> 167:12 <b>presence</b> 188:24 <b>present</b> 21:2 33:25 34:22 37:13 61:23 66:21 189:18 <b>presented</b> 53:7 <b>presently</b> 212:10 212:13 <b>press</b> 72:6 77:7 146:13 <b>pressed</b> 42:1 <b>pressure</b> 97:2,20 109:21 126:2 129:5 200:22 221:25 236:3,3 <b>pressures</b> 149:3 <b>presumably</b> 65:22 85:22 103:24 113:21 <b>presume</b> 76:18 <b>pretty</b> 116:14 157:5 <b>prevented</b> 41:24 219:11 <b>previous</b> 10:10 47:23 56:5 89:11 93:14 113:5 114:15 115:10 116:22 132:4,7 149:15 157:23 170:3 211:5 <b>previously</b> 7:8 51:6 55:11 89:12 99:13 105:3 121:19 128:2 149:16 156:19 167:24 230:19 <b>primary</b> 68:14 171:17 <b>prime</b> 92:20 <b>principal</b> 22:7 <b>principles</b> 50:14 <b>printed-out</b> 75:5 <b>printout</b> 75:7 <b>prior</b> 92:15 119:12 121:1 122:14 148:10 151:5 161:24 167:19</p>
---	--	--	---	---

168:6 <b>private</b> 202:12 <b>proactive</b> 79:19 141:2 142:22 <b>probable</b> 102:15 103:1 111:19 232:1 <b>probably</b> 5:7 6:11 19:25 22:11 34:25 35:19,20 36:24 41:12 52:15 65:16,19 75:20 80:7 86:3 104:12 105:10 107:1 110:2 132:20 134:22 142:6 145:8,13 148:24 150:24 152:12,21 165:12 175:22 193:7 202:3,22 240:18 <b>probing</b> 102:13 <b>probity</b> 9:24 38:9 66:14 196:2,6,16 196:23 197:3 <b>problem</b> 62:18 <b>problems</b> 147:12 <b>procedure</b> 34:24 48:22 59:19,22 200:17 <b>procedures</b> 65:4 94:24 95:12 <b>proceed</b> 34:19 212:20 214:1 216:7,24 <b>proceeding</b> 46:16 <b>proceedings</b> 213:24 222:6,20 222:22 230:15 <b>process</b> 8:3 44:14 46:14,17 47:9 49:3 50:5 51:14 52:4,5,18,21 53:5 54:24 55:4,10 56:3 62:12 124:23 134:17 151:15 163:20 164:4,6 166:17 166:20 168:9	171:24 173:6,11 176:15 177:15,24 178:3 183:17,19 184:23 185:21,21 186:6,17 187:6 187:15 188:25 190:3 193:4,5,9 197:11,17 198:23 200:8,11 201:11 203:25 204:2 212:3,13,18,20 212:25 220:18 221:24 223:20 237:6 241:21 <b>processes</b> 53:20 61:24 <b>professional</b> 41:8 50:8 <b>programme</b> 241:9 243:15 <b>progress</b> 102:5 114:24 131:15 132:3,10,10 139:20 202:18 <b>progressing</b> 81:14 <b>progressive</b> 9:25 11:10 <b>pronounced</b> 40:4 <b>proper</b> 28:7 105:22 179:24 <b>properly</b> 142:2 146:17 174:23 183:20 201:11 <b>proportional</b> 38:7 <b>propose</b> 37:25 <b>proposed</b> 209:11 <b>proposes</b> 34:19 <b>Prosecutions</b> 180:19 <b>prospect</b> 168:9 173:25 <b>protect</b> 42:6 76:7 87:6 230:6 <b>protects</b> 235:22 <b>protesting</b> 81:10 <b>proud</b> 29:3 <b>proves</b> 236:7 <b>provide</b> 79:7 90:24 92:3 94:17	102:17 148:3 244:14 <b>provided</b> 12:11 35:7 79:8 105:17 105:18 117:23 128:5 193:10 197:16 234:1,8 <b>provides</b> 88:17 215:7 <b>providing</b> 89:4 <b>provision</b> 8:21 <b>provisional</b> 70:9 70:24 <b>provisions</b> 9:4 34:20 <b>Provost</b> 16:5,7,21 <b>public</b> 15:2 106:12 140:12,25 143:15 143:18 144:1,9 153:8 180:19 209:10 230:11 <b>publication</b> 142:23 <b>publicly</b> 135:19 <b>publish</b> 141:17 142:19 143:11 <b>published</b> 132:22 135:1,4,13,16 136:1 141:23 <b>publishes</b> 141:1 <b>pull</b> 151:16 <b>punches</b> 243:7 <b>purely</b> 143:25 <b>purpose</b> 225:20 235:10 <b>pursuant</b> 229:8,22 <b>pursuit</b> 105:23 108:1 <b>PUS</b> 217:12 <b>pushed</b> 30:21 <b>put</b> 6:24 18:9 26:10 32:24 48:16 93:12 94:7 124:21 125:13 132:24 133:1 137:21,22 140:18 160:22 163:23 170:17 173:13,20 177:17 180:4 182:12 183:18	184:18 185:18 197:12 200:22 221:8 236:2,18 <b>puts</b> 91:18 <b>putting</b> 23:9 <b>Pyle</b> 1:5,6,8 2:8 11:25 12:25 46:23 73:25 74:2 109:8 142:4,15 203:3,5 240:24 245:3,23,25 <hr/> <b>Q</b> <hr/> <b>QC</b> 21:16 <b>qualities</b> 10:14 <b>quarter</b> 202:16 <b>quarters</b> 202:19 202:21 <b>queried</b> 94:16 <b>queries</b> 65:13 <b>query</b> 68:23 <b>question</b> 17:2 25:4 28:19 36:24 55:23 71:21 81:3 90:19,20 93:12 94:7 98:18 99:17 124:9 133:15 135:25 138:7 154:24 173:2,12 175:4 189:15 199:20 200:4 205:11 210:24 211:11 213:17 218:18 231:15 234:2 241:10 242:22 <b>Questioned</b> 1:7 203:4 <b>questioning</b> 21:3 78:20 <b>questions</b> 16:18 53:1 65:15 92:15 125:5 193:14 240:1 241:13 245:4,12 <b>quick</b> 72:5 125:10 <b>quickly</b> 3:13 13:2 20:1 83:1 85:20 125:12 168:17 173:2 207:24	211:2,22 216:1 216:24 <b>quite</b> 3:5,25 5:7 16:8,22 17:8 18:11 19:17 22:13,14,24 31:24 36:24 40:15 48:19 49:20,25 60:10 67:22 70:1 82:18 83:22 87:17 91:18 93:18 94:8 97:15 99:2 104:2 112:5,12 115:5 125:10,12,25 132:24,25 136:15 139:15 140:9 141:3,6 146:15 149:3 151:9 157:14 158:7,17 161:6,6 163:4 164:25 165:7,15 165:17,22 166:10 168:17 170:8 172:12 179:22 186:1 193:13 202:8,12 215:25 218:3 232:3,19 234:19 235:21 236:9,9 240:22 244:25 245:9 <b>quorate</b> 208:24 213:3,19 <b>quorum</b> 213:18 <b>quote</b> 63:4 <hr/> <b>R</b> <hr/> <b>Radakin</b> 22:6 24:3 26:7 36:15 <b>radar</b> 117:5 <b>RAF</b> 16:15 <b>raise</b> 31:8 34:23 44:4,13,17 45:22 52:17 54:8,24 68:23 93:9 108:15 111:15,16 119:5,7 120:14 120:18 133:20 134:11 136:10 148:15 171:11
--	---	--	--	---

<p>175:1 186:4  <b>raised</b> 30:11 31:6  31:20,24 59:11  60:6 62:16 64:4  64:13 92:1  108:18 119:2  120:20 122:14  146:4,14,22,23  149:8 192:19  222:7 244:24  <b>raises</b> 169:5  <b>raising</b> 101:22  168:8 175:10  <b>ran</b> 154:10  <b>rang</b> 20:1  <b>range</b> 152:10  <b>rank</b> 56:20  <b>ranks</b> 27:4 29:6  <b>rarely</b> 39:6  <b>re-lose</b> 184:20  <b>reach</b> 76:5 87:4  89:5 166:22  189:6  <b>reached</b> 26:21  27:7 242:15  <b>reacting</b> 133:17  <b>reaction</b> 18:10  29:11 164:22  <b>reactive</b> 132:20  141:2 142:22  <b>read</b> 6:4 10:13  11:23 27:20  37:25 58:16 95:8  113:7,9 114:15  114:22 115:1  116:10,20 134:25  143:23 152:20  190:18 195:13  217:22 223:15,16  223:17 225:13  <b>reading</b> 63:10  95:12 119:19  142:1 147:6  161:4 198:17  <b>ready</b> 131:10  140:14 230:1  <b>realised</b> 75:21  <b>reality</b> 224:14  <b>really</b> 23:14 55:12</p>	<p>62:25 64:14  69:13 73:23  80:17 93:18  103:20 134:6  144:5 151:20  161:13 185:14  206:13 207:13  227:14 242:16,24  244:24  <b>Rear</b> 24:3  <b>reason</b> 10:1 20:18  31:17 42:10,12  42:24 63:11  65:14 79:7 86:7  106:10 115:4  122:6 124:1  125:14 128:17  160:3 164:1  176:20 180:3  182:3 186:24  214:3 217:8  <b>reasonable</b> 85:2  93:5 104:16  233:4  <b>reasonably</b> 88:22  89:1  <b>reasoning</b> 89:8  106:24  <b>reasons</b> 45:1 111:2  125:1 164:12  184:7 191:16  193:19 216:17  220:21 221:2,11  223:5,8 224:25  <b>recall</b> 21:15 35:8  35:11 37:18  44:20 61:11,17  62:19,22 63:12  63:13 64:2 67:20  86:18 90:11,13  98:6,9 108:10  109:16 127:18  136:4,13 159:8  179:11 202:1  234:15,18  <b>receive</b> 46:19  129:11  <b>received</b> 11:19  25:2 47:4 74:13</p>	<p>96:19 103:10  104:18 115:14  117:11 118:5  126:19 130:5  137:12 145:7,9  152:1,6 199:7  202:11 212:16  <b>receiving</b> 80:15  148:11  <b>recess</b> 193:12  <b>recipients</b> 113:22  208:16  <b>recognise</b> 28:6  <b>recognising</b> 66:7  207:23 211:1  <b>recollect</b> 39:22  77:20 134:13  153:17 218:22  235:19  <b>recollected</b> 158:22  <b>recollection</b> 58:21  63:1,21 66:23  68:6 69:4,20  75:12 78:11  81:20 90:17 95:7  99:14 224:5  226:10  <b>recommend</b> 34:12  36:2 141:16  <b>recommendation</b>  32:23,24  <b>recommendations</b>  130:2 131:5  135:19  <b>reconstituted</b>  213:23  <b>record</b> 13:13 32:3  32:8 107:19  110:15 175:7  190:21 191:20,25  <b>recorded</b> 75:2  97:21  <b>recording</b> 13:7  84:21  <b>records</b> 70:8 192:1  <b>recourse</b> 229:21  <b>recourse'</b> 61:22  <b>recovered</b> 40:12  <b>recovery</b> 41:11</p>	<p><b>recruit</b> 173:2  <b>recruitment</b> 47:24  48:14 52:3,18  53:12,13,20 55:4  56:3  <b>rectified</b> 137:21  <b>recuse</b> 5:19  <b>recused</b> 50:14  51:13 119:16  164:4  <b>recusing</b> 5:8 6:23  <b>redacted</b> 181:14  <b>refer</b> 10:5,24  14:12,22 22:11  27:25 41:18 56:2  57:19 58:12  63:18 66:15,22  68:5 86:7 93:7  97:7 108:21  115:19 123:20  155:15 159:23  163:13 183:16  204:1 206:10  228:3  <b>reference</b> 34:6,10  35:23 67:16,19  72:22 100:5,6  112:16 113:23  115:12 116:7  143:23 145:2  152:4,6 155:20  158:1 174:19  176:5 183:22  197:6,22 224:11  237:14  <b>referenced</b> 47:20  149:13 181:12  <b>referred</b> 3:21 4:24  11:4 12:2 30:1  34:7 43:14 55:9  56:4 86:25  104:17 123:1  139:10 146:18  149:24 155:25  159:20 168:6  170:5 175:6  181:7 191:8  194:21 210:18  <b>referring</b> 10:21</p>	<p>14:14 43:16,23  63:20,25 85:23  94:15 97:4  105:10 134:20  141:4 150:1  155:18 194:18  222:20 233:12  237:15  <b>refers</b> 53:10 98:1  110:22 111:12  113:5 116:18  227:19 235:16  239:3  <b>reflect</b> 36:5 73:16  125:11 133:9  167:8 208:4  210:6 212:21  221:24  <b>reflected</b> 23:17  128:11 131:19  207:20 210:3  <b>reflecting</b> 31:18  124:23 163:3  <b>reflection</b> 55:6  <b>reform</b> 241:9  243:11,15  <b>refresh</b> 176:4  205:25  <b>regard</b> 40:16  136:7 151:2  157:18 160:15  162:6,6 181:24  204:24  <b>regarded</b> 59:14  <b>regardless</b> 40:20  <b>regards</b> 65:6  175:16 239:20  <b>regret</b> 24:7 25:1  25:10 26:8  <b>regrettable</b> 198:2  <b>regular</b> 22:14,19  146:7  <b>regularity</b> 46:1  <b>regularly</b> 12:23  57:1 77:22,24  83:15 89:13  109:6  <b>Regulation</b> 60:1  61:3</p>
--	---	---	--	---



<p><b>Regulations</b> 62:4  <b>reimbursed</b> 237:4  <b>reinforced</b> 83:7  <b>reiterate</b> 144:16  <b>rejected</b> 237:21  238:19  <b>rejection</b> 238:24  <b>rejects</b> 42:21  <b>relate</b> 112:5  <b>related</b> 77:8  176:21  <b>relating</b> 9:3  176:23 200:17  <b>relation</b> 26:18  55:25 61:6 66:9  97:17 112:10  118:25 119:23  127:10 146:2  157:22 167:20  241:1  <b>relations</b> 15:6  41:14 120:13  135:22  <b>relationship</b> 2:18  2:24 15:5 18:13  20:10 22:16  25:18 29:16,19  41:11 44:24  56:15,18 57:17  61:7 88:13  113:16 117:19  128:6 159:7  170:1 171:15  218:4  <b>relationships</b> 3:14  22:2 27:11  <b>relatively</b> 80:18  140:4  <b>relatives</b> 123:15  <b>relaxed</b> 87:17  <b>relaying</b> 88:6  <b>release</b> 77:7  146:13  <b>relented</b> 14:25  <b>relevant</b> 12:1,8  38:5 81:2 97:16  100:14 103:22  116:24 118:18  209:19 214:21</p>	<p><b>reliance</b> 153:4  <b>relief</b> 165:20  <b>relieved</b> 190:3  236:4  <b>rely</b> 23:9  <b>remain</b> 212:8  219:13 231:19,21  <b>remained</b> 39:13  144:24 145:5  <b>remarkable</b>  152:14,17  <b>remarking</b> 42:14  <b>remarks</b> 111:11  <b>remember</b> 20:12  23:3 38:25 39:1  39:3,12,23 42:13  42:18 47:21 48:3  48:6,8,17 60:15  63:3 74:25 75:19  77:18 78:1,8,10  79:5 80:5 82:2  96:8 109:25  112:23 113:9  116:12,13 122:13  129:14 144:4  149:18 153:22  156:9,25 157:6,7  157:8 161:25  163:3 165:19  167:3 175:3  195:7 198:17  201:25 207:3  215:22 216:3  238:12  <b>remembered</b> 43:9  79:14  <b>remind</b> 52:3  192:25 195:21  198:14  <b>reminded</b> 235:23  <b>reminders</b> 201:14  <b>remiss</b> 173:9  <b>remit</b> 35:10 62:3  <b>removal</b> 174:20  <b>remove</b> 49:25  <b>removed</b> 16:9,22  39:14  <b>remuneration</b>  162:13</p>	<p><b>repair</b> 2:24 29:19  <b>repeat</b> 35:13 99:17  149:5 156:22  213:11  <b>repeated</b> 61:19  64:17  <b>repeatedly</b> 88:24  <b>repeating</b> 167:25  189:11  <b>repetitively</b> 39:7  <b>rephrase</b> 55:23  <b>replace</b> 242:7  <b>replacement</b>  172:19 173:3,5  <b>replied</b> 47:8 68:19  90:25 94:18,21  228:9 232:25  <b>replies</b> 72:12  172:15  <b>reply</b> 127:14  143:14  <b>replying</b> 205:17  <b>report</b> 10:19 12:6  13:25 30:25  32:22 33:12,13  34:21 44:7 73:6  74:13 92:25 95:8  95:22 96:24 97:6  100:19 111:5  112:21 115:13,22  116:4,8,11,19,19  116:21 120:23,24  120:25 121:1,5,6  121:10,19 122:3  122:10,21 124:7  126:7 128:21  129:9,12,19,24  130:9,13 131:23  132:1,4,8,11,13  132:16,25 133:6  133:16,18,24  134:1,8,25 135:3  137:12 139:6,11  139:14 140:11,25  141:3,14,17  142:20,23 143:11  144:1,3,9,23  145:4,7,9,11  146:3 152:20</p>	<p>178:21 180:13  203:14 204:20,24  206:1,2,3 207:8  233:24  <b>report/letter</b> 112:3  <b>reported</b> 32:12  34:10 35:24  42:23 71:1 78:6  79:25 84:16 85:6  85:16 87:8 125:9  131:4 155:19  160:7 235:20  <b>reporting</b> 11:1  13:19 32:10 46:2  58:15 86:15  180:10  <b>reports</b> 29:7 43:9  45:17,19 46:2  58:14 64:11,14  131:19 137:18  150:25  <b>representations</b>  125:3 166:15  173:8 174:7  183:10 184:25  193:11 195:18  197:9 198:22  199:3,12 207:9  208:5 210:7  <b>representative</b> 7:7  7:13 56:20 199:9  236:6  <b>represented</b>  131:14  <b>reproach</b> 200:9  <b>reputation</b> 163:23  <b>reputational</b> 119:4  119:8 124:12  153:24 154:14  <b>request</b> 6:24 34:2  88:19 96:21  123:23 125:21  126:6 127:16  128:15 178:19  180:12 199:10  228:17 230:9  231:1  <b>requested</b> 13:20  122:4 123:17</p>	<p>134:2 205:1  223:14 236:20  <b>requesting</b> 179:2  <b>require</b> 119:2  203:13  <b>required</b> 8:15  117:7,15  <b>requirement</b> 148:6  <b>requirements</b>  25:14  <b>requires</b> 28:3  <b>research</b> 52:22  164:24  <b>reserve</b> 236:23  <b>reset</b> 27:11  <b>resign</b> 186:21  209:2 228:3  <b>resignation</b> 183:4  200:20 203:17  205:14,15 209:17  215:12 228:2,4  229:8  <b>resistance</b> 238:25  <b>resisting</b> 238:16  <b>resolve</b> 207:24  210:11 211:1,8  211:13 242:3  <b>resolved</b> 18:15  22:4 27:5 82:25  216:25 217:21  218:19 240:13  <b>resolving</b> 232:3  <b>respect</b> 11:24  17:14 28:8,9,10  28:11 38:10,14  39:10 49:10,13  49:13 57:8 60:8  97:14 120:9  137:15 177:1  191:18 192:1  197:25 198:20  226:21 244:16  <b>respected</b> 110:7  <b>respective</b> 122:25  <b>respond</b> 22:10  65:7,17 102:19  121:7 140:14  148:9 172:11  202:13</p>
---	---	--	--	--

<b>responded</b> 235:3	<b>retirement</b> 186:20	167:15,16 186:20	222:4 241:5	13:5
<b>responding</b> 202:4	224:13 228:22	204:25 234:21	243:18,23 244:11	<b>saved</b> 103:16
<b>responds</b> 16:18	229:6,10,14,18	235:4	244:18	<b>saw</b> 3:1,6 7:6,12
102:10 106:2	231:6,11 233:2,5	<b>RGP'</b> 30:11	<b>roles</b> 2:19,21 19:9	35:23 152:25
<b>response</b> 27:21	236:1,25 237:2,6	<b>RGP's</b> 21:18	170:18	184:24 195:11
42:17 51:22	238:4	<b>RGP/Spanish</b> 77:6	<b>room</b> 23:4 61:16	198:12
90:20 114:15	<b>retiring</b> 241:14	<b>Rhoda</b> 21:16	67:1 75:5,13	<b>saying</b> 20:14 27:6
118:21 120:23,25	<b>retract</b> 230:9	<b>RIB</b> 64:25 65:2	240:19	48:3,7,17 50:4,7
123:8 126:23,24	<b>return</b> 4:20 224:6	<b>Richard</b> 206:8	<b>rough</b> 73:1 98:16	61:17 62:11 72:4
127:2 129:22	242:10	<b>Richardson</b> 74:22	<b>roughly</b> 112:25	78:8,10 85:5
139:6,11 144:25	<b>reveal</b> 175:17	90:12 98:7	117:10 118:9	95:3 98:7 106:6
147:4 148:9	180:25 181:9	<b>Richardson's</b>	<b>route</b> 221:16	111:3,8,18
152:13 168:21	<b>revealed</b> 181:2	67:14 97:24	240:20	112:17 130:3
199:17 202:7	<b>revert</b> 239:8	<b>Ricky</b> 21:16	<b>Royal</b> 24:23 25:13	145:2,6 152:2
208:3 225:5	<b>review</b> 30:21,25	<b>riddance</b> 28:24	26:5 138:25	156:9 157:8
227:17 229:1	33:18 36:12,23	<b>right</b> 19:5,17	<b>rule</b> 205:6	168:14,22 172:6
<b>responses</b> 124:13	37:1,6,6 39:10	20:12 23:15	<b>rumors</b> 45:16,22	183:12 184:3
143:5	130:25 221:7	35:21 41:6 43:24	<b>rumours</b> 45:10	185:9,15 187:23
<b>responsibilities</b>	223:21 227:21	89:19 96:10	46:1 230:12	188:7,16 195:9
65:25 214:8	<b>revising</b> 60:18	97:10 107:12	<b>run</b> 135:18	215:22 219:1
215:24	<b>RGP</b> 9:25 11:3	132:24 133:1	<b>runaway</b> 95:14	231:5 233:1
<b>responsibility</b>	14:15 15:1,8,15	137:21,22 138:6	<b>running</b> 88:3	<b>says</b> 16:20 21:8
40:12 68:13	15:23 16:25 17:5	140:18 142:21	<b>runway</b> 4:11 15:9	24:6 26:16 27:20
92:22 138:8	17:15 18:21	153:14 157:8	77:13 147:22	29:22 34:1 46:16
154:22 170:19	20:18 23:21 28:8	165:21 168:14	151:4	51:5 52:1 59:8
185:4 203:12,22	30:6,23 31:1	169:4 170:11	<b>rupture</b> 18:13	61:1 64:23 65:10
204:5 215:3,10	33:22 38:5,10,18	173:18 184:13	<b>rushed</b> 110:15	67:15 74:11,18
<b>responsible</b> 8:7,17	39:12,19,20,24	185:20 189:6	228:24	75:7 98:4,20
9:7 15:14 40:20	40:2,4,17 41:15	193:13,18,21		105:22 106:9
132:12 133:3	42:2,5 43:2,19	198:24 200:10	<b>S</b>	107:16 109:6,13
<b>rest</b> 17:4 85:21	45:4,8 47:2 50:3	202:8,12 206:5	<b>s</b> 30:11 39:21	110:14,18,23
<b>restaurants</b> 45:20	52:1 54:16 55:17	216:2 220:1	131:19	112:8 121:3
<b>restrain</b> 38:5	56:21,22,23 58:1	221:10,11,11	<b>sabbatical</b> 162:11	122:9 126:18
<b>restraint</b> 67:10	60:20,24 64:5,6	228:23	<b>safe</b> 201:12	143:24 150:16
<b>result</b> 39:12	65:23 70:10 72:9	<b>rightly</b> 114:13	<b>safeguard</b> 239:15	181:4 197:23
139:24 156:5	77:7 78:7,22	<b>rise</b> 58:19 153:5	<b>saga</b> 148:1 149:25	201:19 203:9
179:1 194:2	82:18 95:8,10,10	159:17	211:23	205:5 212:1
<b>resulted</b> 38:21	96:24 100:3	<b>risk</b> 140:20 163:23	<b>sake</b> 43:16	217:7 233:18
56:17	104:10 110:11	211:13 229:22	<b>Santa</b> 74:17 113:1	235:1 236:13
<b>resulting</b> 40:2,9	117:13,20 119:6	<b>road</b> 138:22 141:1	<b>SANTOS</b> 1:3,7	<b>scan</b> 122:1
56:22 57:25	127:9 131:23	141:17	6:12 13:13 37:13	<b>scenario</b> 185:23
<b>retire</b> 125:19,19	136:16,22 138:17	<b>robust</b> 218:11	43:11 56:11	190:1 197:11
179:6 183:1	139:16,23 140:6	<b>Rock</b> 29:6 39:13	73:19 74:4 91:11	206:13
185:11 198:7,21	140:9,19 145:16	48:1 151:2	96:3,10,15	<b>scenarios</b> 187:17
199:10 200:1	145:18 146:12	<b>role</b> 3:1,6 6:16 7:6	107:12 135:17	<b>scene</b> 192:24
227:20 228:4,13	147:10,16,25	23:6 48:8,10	142:4,11,15	<b>scheduled</b> 76:15
230:9 232:22	149:22 152:3	120:19 174:1	196:12 202:15,24	241:16
236:6 237:8	154:7,9,17,18	185:3 187:3,4	203:4 245:3,20	<b>school</b> 195:10
240:23	155:9 162:4	214:7 219:15,18	<b>Saturday</b> 116:16	<b>scoring</b> 52:25 53:9
			<b>save</b> 6:19 12:21	

<p><b>screen</b> 5:24 6:1,2 9:19 11:21 24:2 51:21 74:8 82:12 115:18 117:6,8 118:4,6 175:13 240:6</p> <p><b>screw</b> 28:4</p> <p><b>scrutiny</b> 180:5 185:19 204:9 207:25 211:3</p> <p><b>sea</b> 10:19 11:14,17 23:13,17 41:13 55:13,20 64:18 70:17 76:17 78:4 126:18 137:12,14 137:21 146:3 152:19 153:7,11 154:8,11 156:17 160:7 168:1 178:21 233:23</p> <p><b>search</b> 157:19 158:5 160:16,25 176:22,23 214:20</p> <p><b>seats</b> 50:18</p> <p><b>second</b> 1:24,25 10:12 11:23 22:24 38:1 41:16 50:19 59:7 85:22 87:24 88:1 98:4 106:8,9 115:19 123:9 133:12 137:23 138:20 139:12 143:20 168:8 195:21 196:8 197:21 207:17 208:15 210:24 220:11 237:17</p> <p><b>second-guess</b> 187:8</p> <p><b>secondly</b> 106:17</p> <p><b>seconds</b> 61:21</p> <p><b>secret</b> 57:6</p> <p><b>Secretary</b> 7:10 63:7 140:23 217:24 219:21 237:18,22 238:7 238:8,14 239:7 240:11,15,25</p>	<p>241:9</p> <p><b>section</b> 3:22 4:23 8:2,5,6,11,14,21 12:6 34:7,8,8,20 34:23 44:23 65:25 92:25 116:7,11 120:23 120:24,25 121:1 121:19 122:3,8 122:19,19,21 123:1,17,22 124:16 125:20 126:6 127:1,22 128:25 163:1 168:9 175:25 178:3,7,10,12 179:4 183:3,10 183:13,16,24 184:7 186:4,5,16 186:22,23 187:6 188:25 189:14,24 197:18 198:5,9 198:10 200:19 201:10 203:7,19 203:25 205:4,22 206:14,15 209:16 212:4,20,22,25 215:3,6,6,17,19 215:24 216:13,16 218:12 219:4,10 219:11 221:15 224:8,11 229:8 229:22 237:5 239:22 240:20</p> <p><b>sections</b> 132:1 204:8 209:20</p> <p><b>secure</b> 209:17 236:11</p> <p><b>securing</b> 228:21</p> <p><b>security</b> 8:8,18 135:23</p> <p><b>see</b> 9:18 17:16 19:25 20:15 21:9 23:18 34:22 38:2 51:21 66:19,20 68:2 76:11,23 79:17,20 87:22 94:4 112:9 115:5 121:12 124:18</p>	<p>126:19 128:15 138:14 140:9 143:13,15 166:8 166:12 167:4 169:7,23 177:1 177:12 190:2 194:9 197:15 200:2 204:19 206:13 218:15 223:12,24 224:6 227:2,13 236:20 237:18 238:8 239:19 240:14,16 240:19 243:2 244:21,21</p> <p><b>seeing</b> 37:7 75:13 86:13 118:4</p> <p><b>seek</b> 31:4 33:15 35:10 80:24 121:5 194:20 220:14,24</p> <p><b>seeking</b> 24:19 25:15 72:10 106:22 121:1 124:6 127:7,8 144:8 161:19 222:7,16</p> <p><b>seen</b> 26:3,4 29:7 38:23 65:16 70:8 114:8 115:9 132:6 134:23 194:15 208:1 211:4</p> <p><b>sees</b> 231:21</p> <p><b>selection</b> 47:9</p> <p><b>self-</b> 153:11</p> <p><b>self-standing</b> 54:15 55:21</p> <p><b>send</b> 6:18 32:11 72:3 77:2 87:12 115:11 139:3 142:2 195:2 207:17,18 237:13</p> <p><b>sending</b> 90:1 222:19</p> <p><b>senior</b> 15:24 18:17 21:2,15 29:6 30:18 31:15,19 32:15 36:18</p>	<p>48:15 50:2 51:25 130:14,20 131:10 133:4,9 136:18 147:15 162:17 173:15 182:6</p> <p><b>sense</b> 45:14 88:12 88:16 92:13 93:7 122:1 139:19 146:7 167:5 196:5,23 197:2 206:19 207:5 231:9,21,23</p> <p><b>senses</b> 140:10</p> <p><b>sensitive</b> 12:18 173:1</p> <p><b>sensitivities</b> 81:11 86:11</p> <p><b>sent</b> 4:3 7:11 13:19 34:16 37:23 38:21 65:18 77:3 83:12 134:15 135:6 139:1 141:24 147:6 195:4,5,12,13 199:2 225:22,23 233:13 242:8</p> <p><b>sentence</b> 40:11 96:23 100:1 115:19 196:13 210:5,23,24 211:6 222:2 234:13</p> <p><b>sentences</b> 196:14</p> <p><b>sentiments</b> 29:14</p> <p><b>separate</b> 40:16 55:20 95:16 124:5 152:4 153:7 192:24</p> <p><b>separated</b> 54:13</p> <p><b>separately</b> 63:5</p> <p><b>separations</b> 201:4</p> <p><b>September</b> 2:10 241:16,23</p> <p><b>sequence</b> 159:15 179:12</p> <p><b>sequencing</b> 178:7</p> <p><b>series</b> 215:7 237:8</p> <p><b>serious</b> 22:2 40:8 66:5 82:9 119:5</p>	<p>153:10 157:17 160:14,23 198:1 205:8 233:14</p> <p><b>seriously</b> 31:2 33:18 35:18</p> <p><b>seriously'</b> 131:8</p> <p><b>seriousness</b> 118:25 126:21 204:7 235:14</p> <p><b>served</b> 3:20 4:22 61:2</p> <p><b>serves</b> 180:2 240:5</p> <p><b>service</b> 236:17 241:2,10 243:10</p> <p><b>services</b> 19:11 209:11</p> <p><b>set</b> 37:24 66:10 69:18 76:16 115:2 139:10 161:16 166:17 177:21,24 178:16 178:19 180:3,12 181:21 190:16 195:16 198:10 223:20 243:12</p> <p><b>sets</b> 95:16 110:13 111:25 196:1 229:1</p> <p><b>setting</b> 31:25 192:24 235:8</p> <p><b>seven</b> 25:20 83:15 239:6 242:2</p> <p><b>severely</b> 41:23</p> <p><b>severity</b> 115:8</p> <p><b>shake</b> 155:8</p> <p><b>shaken</b> 65:3</p> <p><b>shame</b> 139:22</p> <p><b>share</b> 36:3,8 77:16 77:19 79:2 102:22 105:8 108:7 129:24 159:19 169:15 229:24</p> <p><b>shared</b> 28:16 29:25 72:25 129:19 156:14 191:3 198:16 201:1</p> <p><b>sharp</b> 149:5</p>
---	---	--	--	--

<p><b>sharpen</b> 152:25  <b>sharper</b> 152:11  <b>sharpness</b> 146:16  <b>shed</b> 110:24  <b>sheet</b> 52:25  <b>shift</b> 79:1 84:14  <b>ships</b> 84:23  <b>shocked</b> 65:3 80:8  <b>shoes</b> 29:9  <b>shook</b> 110:1  <b>short</b> 3:23 62:5  73:7,23 74:6  132:14 142:13  202:20 203:1  236:21 240:8  241:11  <b>shorten</b> 245:11  <b>shorter</b> 191:21  <b>shortest</b> 134:22  <b>shortly</b> 130:24  240:12  <b>show</b> 10:11 24:4  28:7 43:15 46:14  113:19 196:13  211:10  <b>showed</b> 194:23  195:1  <b>showing</b> 106:21  <b>shown</b> 38:5 74:8  75:12,16 103:14  210:22  <b>shows</b> 5:6 112:4  117:9  <b>side</b> 26:4 35:21  77:13 112:18  143:16 151:13,14  <b>sided</b> 39:9  <b>sides</b> 26:2 59:12  60:6 109:19  <b>sift</b> 54:19,19  <b>sigh</b> 157:7 165:20  <b>sight</b> 92:25 114:9  <b>sign</b> 239:10  <b>signal</b> 83:11 84:9  <b>signature</b> 1:16 2:2  <b>signed</b> 240:22  243:25  <b>significance</b> 93:17  <b>significant</b> 93:25</p>	<p>97:12 151:7  161:7  <b>significantly</b> 104:8  104:24  <b>signing</b> 239:17  <b>silent</b> 61:16  <b>similar</b> 8:21 45:2  60:10  <b>simple</b> 154:24  <b>simply</b> 12:17 46:4  49:25 63:12 89:6  140:9 187:2  189:2 213:18  <b>Singapore</b> 48:4  <b>sir</b> 1:3 2:15 22:5  26:17,24 27:3  73:22 75:22  109:24 157:4  202:16 210:11,15  211:9,14,20  217:18,24 218:2  218:8,13,17  228:16,18 230:7  230:10,15,24  231:1,12 232:2  241:16  <b>sit</b> 50:17 91:21  226:11  <b>sitting</b> 23:3 62:23  <b>situ</b> 220:2  <b>situation</b> 26:18  28:3 68:11 115:8  122:3 191:5  210:19 215:5  216:10 229:24  235:15 237:7  239:14 242:2  <b>six</b> 29:21 64:22  67:7 79:3 82:16  83:15 85:25  86:14 91:7 92:5  92:6 100:18  113:1 199:7  <b>skip</b> 14:22 82:24  <b>skipping</b> 28:13  105:4  <b>sleeping</b> 162:10  <b>slight</b> 94:9 121:13  231:14</p>	<p><b>slightly</b> 7:7 68:19  82:9 124:2  216:20 217:22  220:12 226:16  231:17,19,22  232:12,16 244:17  <b>slip</b> 111:4,6  <b>slipped</b> 115:4  <b>slow</b> 187:14  <b>slower</b> 126:4  187:16  <b>slowly</b> 81:14  <b>small</b> 130:17  242:25  <b>Smith</b> 108:24  109:25 110:17  111:9  <b>Smith's</b> 109:5  <b>smuggling</b> 64:25  65:1  <b>SNT</b> 29:3  <b>social</b> 11:1 12:14  45:18 46:2 82:23  <b>sofa</b> 165:21  <b>soft</b> 3:4  <b>softer</b> 52:11 157:2  <b>solicitor</b> 88:14  <b>solicitor/client</b>  88:13  <b>SOLIS</b> 95:8,22  <b>Somalia</b> 165:5  <b>somebody</b> 19:18  22:20 50:16  90:13 163:6  170:5 173:11  174:16 217:25  219:22  <b>somewhat</b> 216:14  236:4  <b>sonar</b> 4:4  <b>soon</b> 16:10,24  28:21,25 102:15  142:24 211:8  <b>soonest</b> 239:8  <b>SOPs</b> 96:25  <b>sorry</b> 4:7 9:21 32:4  34:13 36:7 59:5  65:8 71:24 81:25  84:3 91:5 99:17</p>	<p>102:19 115:16,17  115:23,23 116:6  119:15 120:24  123:2,4 127:5  138:19 141:8  149:10 159:25  172:19 187:21  196:6,12 204:18  204:22 211:4  214:23 225:17  229:11 231:19  233:7 239:4  240:7  <b>sort</b> 7:6 36:11  49:21 52:24  53:15 55:14,18  58:18 78:11 82:4  82:5 90:16 91:18  109:18 128:5  134:6 135:8  137:19 145:14  146:9 149:6  152:23 153:8  161:14 162:12  169:12 176:2  179:23 184:18  193:12 223:4  232:15 233:3  243:11,11  <b>sought</b> 180:22  204:1 213:25  214:14 220:15  231:10 238:16  <b>source</b> 101:15  130:10  <b>sources</b> 45:8,11  46:11  <b>South</b> 48:4  <b>sovereignty</b> 119:4  119:8  <b>Spain</b> 68:11 69:10  76:5,14 87:5  95:2 106:20  107:4 113:16  114:4 120:13  123:14 124:14  126:11 147:8  <b>Spanish</b> 4:2 68:16  70:17 72:7 74:15</p>	<p>77:9 79:4,4 81:1  81:10 82:17,19  82:21 83:3 84:17  85:3,12 86:1,22  91:8,19 92:5,10  93:6 95:11,21  101:11 102:1  106:15,16,21  109:1 110:19  111:13,24 113:6  113:11,12 114:2  114:10 115:25  117:20 123:19  125:16 138:3,11  <b>speak</b> 3:18 19:19  134:5 137:23  160:8 166:9  185:14 230:1  <b>speaking</b> 13:2  208:7 210:8  <b>specific</b> 111:2  206:7  <b>specifically</b> 136:12  145:20  <b>Specified</b> 19:12  <b>speculation</b> 82:23  <b>speed</b> 108:15  121:15 122:7  211:18  <b>speeded</b> 167:3  <b>spell</b> 159:10  <b>spend</b> 221:21  <b>spent</b> 116:15 240:9  <b>split</b> 170:18 214:8  <b>spoke</b> 43:18 57:1  61:3 107:23  130:13 136:10  143:13  <b>spoken</b> 85:10  143:24  <b>spot</b> 114:7  <b>springs</b> 165:5  <b>spurred</b> 11:16  <b>Squadron</b> 16:5  25:22  <b>square</b> 61:10  230:11  <b>staff</b> 15:25 16:2  22:5 23:2 62:16</p>
--	---	---	--	--

<p>130:14  <b>staff</b> 130:23  <b>stage</b> 12:21 49:3  65:13 72:12 76:4  87:4 100:14  101:21 104:5,11  125:25 127:13  137:6 140:12  145:22 173:23  174:1 178:7  181:1 183:16  207:8 226:25  <b>stake</b> 115:6  <b>stakeholders</b> 9:10  <b>stalemate</b> 229:20  <b>stand</b> 32:1 95:3  181:17 220:5  <b>standard</b> 65:22  94:23 143:4  <b>standards</b> 135:11  <b>standing</b> 117:3  153:12 233:11  <b>standoff</b> 14:25  <b>start</b> 27:11 51:24  96:25 97:6 154:4  155:21 173:10  184:22 193:5,9  198:19 205:18  217:2 245:18  <b>started</b> 14:18  85:20 99:5  116:14 137:4,6  157:2 160:24  233:11 244:1  <b>starting</b> 10:23  69:10 72:2 137:1  137:13 147:14  148:7 215:20  244:7  <b>starts</b> 64:22 96:23  127:4 141:9  214:24  <b>state</b> 42:2,22 46:19  75:15 95:1 154:1  156:11 180:22  190:14 199:22  200:4  <b>stated</b> 9:22 62:17  89:12 131:17</p>	<p>169:16 178:25  233:22 239:25  <b>statement</b> 9:16,17  11:5 14:11 16:19  16:24 22:12,25  30:10 32:2 39:16  41:18 42:19  43:13,17,23  44:22 46:15  50:23 53:19  54:12 59:8,17,22  63:18 64:1 66:3  74:9 83:10 84:5  87:24 88:1 89:15  90:5,21 92:13  106:9 110:23  133:12 142:24  151:24 178:17  189:16 227:1  233:6,7,8 239:3  <b>statements</b> 1:11,13  63:11  <b>states</b> 8:25 53:24  57:6 59:21 62:23  <b>stating</b> 6:19 34:17  47:21 224:14  <b>station</b> 16:4,14,15  84:10  <b>status</b> 147:20  <b>statute</b> 147:19  <b>statutory</b> 238:23  <b>stay</b> 7:24 242:18  243:2  <b>stayed</b> 242:10  <b>Steel</b> 2:15 109:9  157:4 211:9,14  211:20  <b>Steel's</b> 210:12  <b>steering</b> 138:22  <b>stemmed</b> 154:19  <b>step</b> 3:11,12 168:4  221:24  <b>stepped</b> 16:25  <b>Stepping</b> 242:18  <b>steps</b> 18:19 42:7  46:8 166:1  209:23 211:15  <b>sticks</b> 42:11  <b>stood</b> 20:7 183:5</p>	<p><b>stop</b> 35:14 135:16  162:23 230:14  <b>stop-over</b> 41:20  <b>stories</b> 45:3,5,7  46:6 58:14  <b>storm</b> 211:7  <b>story</b> 95:9  <b>straight</b> 94:8  205:4,22 206:15  <b>strained</b> 2:24  <b>strategic</b> 140:8  <b>stray</b> 106:15,16  <b>strength</b> 166:24  183:11 184:9  <b>strengths</b> 243:7  <b>stress</b> 40:3 188:3  223:1  <b>stressing</b> 184:4  185:17  <b>stretch</b> 241:20  <b>strong</b> 11:6 21:22  52:13 92:13 93:7  149:20 183:5  184:7 216:17  220:20 221:1  <b>stronger</b> 165:9  <b>struck</b> 91:1 95:11  <b>studied</b> 139:14  <b>stuff</b> 125:9 132:25  137:19  <b>style</b> 56:17 57:8  61:8 78:9 131:20  <b>subject</b> 214:16  233:2 237:1  <b>subliminally</b> 82:8  <b>submission</b> 32:25  33:14  <b>submit</b> 34:21  87:14 203:14  <b>submitted</b> 133:19  <b>submitting</b> 236:25  <b>suboptimal</b> 52:16  <b>subsequent</b> 15:20  169:11 235:16  <b>subsequently</b>  74:19 80:23  109:3 237:24  <b>substance</b> 144:3  <b>substantial</b> 97:15</p>	<p>132:10  <b>substantive</b> 220:11  <b>successful</b> 241:24  <b>successor</b> 109:9  242:5  <b>succinctly</b> 3:6  <b>suddenly</b> 184:17  184:20  <b>suffer</b> 236:15  <b>sufficient</b> 123:17  192:10  <b>sufficiently</b> 162:25  163:18 195:16  <b>suggest</b> 29:20  60:17 98:15  100:11 105:14  140:24 142:22  165:1 177:19  182:2 205:3  219:21 225:25  236:7  <b>suggested</b> 19:20  50:16 93:4 136:9  164:19  <b>suggesting</b> 18:25  48:9 125:18  175:24 176:14  206:16  <b>suggestion</b> 6:17,25  7:4 21:1 53:11  91:15 123:21  136:25 238:9  244:17  <b>suggestions</b> 53:4  <b>suggests</b> 121:18  122:11 140:2  141:11  <b>suite</b> 74:20  <b>sum</b> 31:13  <b>sum-up</b> 3:5  <b>summarise</b> 10:20  <b>summarised</b>  191:15  <b>summary</b> 62:14  229:2 234:3  <b>Sunday</b> 71:10,14  71:16 79:22  81:21 89:25 90:2  93:14 94:1</p>	<p>103:14 233:1  <b>superintendence</b>  60:3  <b>Superintendent</b>  67:13 74:10,22  75:7 90:12 97:24  98:6 108:24  109:5 110:16  118:11 127:6  <b>superior</b> 16:12  <b>supervisors</b> 131:3  <b>supper</b> 76:19  77:22  <b>support</b> 3:1,11,12  28:4 36:9 47:4,7  48:24 49:22  50:12,24 51:8,11  110:4 142:19  147:13 237:23  <b>supported</b> 21:18  51:12 124:6  <b>supportive</b> 3:11  128:7 201:2  236:12  <b>suppose</b> 23:8 58:6  <b>Supt</b> 43:18  <b>sure</b> 6:5,8 64:12  72:8 78:19 84:18  90:9 92:7 97:3  99:11 112:15  116:14 121:8  122:14 123:6  130:8 145:21  163:5 194:17  221:25  <b>surely</b> 81:14 94:23  156:3 189:13  236:4  <b>surprised</b> 18:8  44:8,19 47:17  49:20 53:9 69:18  80:9,16 159:6  160:9 171:5,14  201:23 214:11  227:3  <b>surrendered</b> 15:1  <b>surrounding</b> 152:3  <b>surveys</b> 62:16  <b>suspect</b> 19:14</p>
---	--	--	--	--

20:18 39:8 77:25 78:6,25 79:21 80:21 82:7,10 100:1 117:6,14 118:6,7 150:10 152:10 163:21 170:17,21 202:18 245:6 <b>suspect'</b> 39:21 <b>suspect's</b> 40:5 <b>suspected</b> 24:13 74:24 119:20 135:24 <b>suspend</b> 203:16 215:12 229:21 <b>suspension</b> 229:7 <b>suspicion</b> 15:25 92:14 93:8,9 <b>suspicious</b> 92:23 101:10 120:16 239:24 <b>suspicious</b> 84:8 <b>swayed</b> 112:16 <b>swearing-in</b> 230:8 230:16 <b>Sweeney</b> 30:19 31:14 82:6 <b>switched</b> 91:1,1 94:19 95:6 96:12 100:10 118:7 <b>sworn</b> 1:6 28:13 <b>swung</b> 148:21 <b>sympathetic</b> 99:7 <b>system</b> 53:9 <b>systematic</b> 130:25 <b>systems</b> 94:17	177:13 187:15 188:15 189:9 197:18 202:17,21 207:25 211:3,15 217:15 220:3 231:13 232:2 233:1,5 235:25 241:11 243:18,22 <b>taken</b> 18:16,19 29:8 46:8 75:20 83:25 108:4 112:6,14 114:24 117:5 118:13 154:23 164:13 169:1,8 208:19 211:16 212:1 219:16 220:6 225:8 226:16 233:14 234:5 244:14 <b>takes</b> 131:7 <b>talk</b> 136:15 137:9 149:17 205:19 210:4 220:19 240:18 243:6 <b>talked</b> 45:19 214:9 <b>talking</b> 149:18 179:21 <b>talks</b> 76:6 83:2 87:5 <b>tally</b> 118:8 <b>tarmac</b> 17:1 28:20 <b>task</b> 2:22 177:21 <b>tasked</b> 30:24 <b>teacher</b> 195:10 <b>team</b> 16:15 32:15 101:16 110:4,4 117:1 126:6 133:5,9 136:18 143:6 146:9 <b>Teams</b> 230:1 <b>technical</b> 90:23 117:8,15 <b>teleconference</b> 201:24 <b>teleconferences</b> 146:8 <b>telephone</b> 152:1,5 194:5	<b>television</b> 206:2 <b>tell</b> 2:17 12:15 28:14,17,25 29:23 52:3 68:21 93:19 94:4 125:9 134:9 159:22 160:1 161:17,22 171:20 172:2 230:20 232:9 <b>telling</b> 46:11 105:12 120:1 <b>tellingly</b> 144:24 145:4 <b>temperate</b> 236:9 <b>tempted</b> 205:3 <b>ten</b> 69:5 98:20 245:7,21 <b>tend</b> 58:17,18 87:10 181:19 <b>tender</b> 205:15 <b>tendering</b> 228:1 <b>tends</b> 80:20 <b>tense</b> 218:3 <b>tensions</b> 56:22 58:1 <b>tenure</b> 217:2 <b>terminology</b> 159:15 179:12 234:25 <b>terms</b> 6:15 49:19 81:13 92:22 99:9 102:18 103:9 105:22 112:21 117:25 123:8 137:16 147:17 150:16 185:20 186:20 190:23 191:25 195:2 197:19 200:11,12 202:4,18 222:22 228:21 229:14 231:7,11 233:2 234:17 235:9,13 236:11 237:1,2,6 237:21 238:3,16 238:20,21 239:15 240:13 242:4 <b>territorial</b> 68:16 78:18 81:8 92:11	106:17 <b>territory</b> 47:21 173:16 <b>test</b> 94:3 <b>testing</b> 40:13 <b>text</b> 53:24 237:9 <b>texted</b> 107:17 <b>thank</b> 2:8 6:12 12:16 74:3,4 96:7 106:2 126:15 142:4,11 142:20 189:17 202:24 211:12 217:7 245:3,19 245:20,24,25 <b>thanked</b> 17:15 65:11 <b>thanks</b> 65:7,11 72:4,15 172:22 201:21 205:3 239:18 <b>theirs</b> 29:9 <b>theme</b> 88:3 <b>thereabouts</b> 130:6 <b>thermal</b> 84:21 <b>they'd</b> 84:22 226:18 <b>thing</b> 6:10 22:21 29:1 61:13 69:11 81:15 83:18,21 91:20 111:7 130:1 173:18 177:17 185:22 205:15 221:4 228:23 <b>things</b> 45:12 46:7 53:16 54:16 59:14 63:7 66:8 85:15 98:12 109:22 121:16 125:11 126:13 140:18 160:12 174:4 183:5 187:16 208:19 210:17 243:9 <b>think</b> 4:4,7 5:6 7:17 8:25 11:4 11:12 12:16 13:16 14:13 18:1	18:25 19:25 20:9 20:22 22:11,24 23:12 27:6 29:14 29:18 31:12 32:17 33:20 34:5 34:9,14 36:13,17 36:19,20,21 39:6 40:15 41:8,13 43:15 44:6 45:1 45:17 50:7 53:10 53:19 54:13 55:1 55:7,11,23 56:4 57:14 59:1,1 60:9 63:15,25 64:10,16 67:2,16 69:5,25 70:20 71:22 79:16 80:6 83:6,6,18 84:4,11 84:24 85:19 86:3 90:15 93:13,21 95:13,14,16,22 96:4,10 97:20,22 98:19 99:6 101:5 101:24 103:13 104:5,12 105:10 107:9,12 108:18 111:7,8 112:15 113:9,13 114:14 114:21 115:7 118:15,15 120:17 121:22,25 123:2 124:12,21 125:11 125:14,22 126:8 126:9 128:17 129:8 130:5,7 132:3,5,15,21 134:1,13,15,16 134:20 135:1,3,5 135:9,13 137:4 138:5,6,12,21 140:1,19 141:6 141:10,24 142:5 143:20 145:8,20 146:13 148:2,14 148:17,25 149:12 149:12,13 150:24 151:7,8 152:21 152:24 155:16,24 156:4,20 157:9
<b>T</b>				
<b>tab</b> 1:13,24 <b>tactical</b> 110:10 <b>take</b> 5:10 13:25 25:21 38:11 39:24 42:7 44:25 50:17 56:8 59:3 59:4 60:25 88:2 96:7 99:21 103:2 107:18 124:22 140:5,21 149:7 161:19 166:1,20 170:9 176:7				

158:4,11,13,25 158:25 159:12 160:5,21,21 161:2,13 162:23 164:3,19 167:2 167:17 168:12 169:11 170:5,13 170:15,22 171:21 171:25 173:5,9 173:17 174:8 179:9,22 180:2 181:11,13,17,21 182:11 183:18,21 184:1,11 185:5 185:11,17,25 186:7,9,14,15,25 187:13 189:4,5 189:20 191:13,15 191:20 192:9,22 193:6,17 194:4,7 194:13,23,24,24 195:4 197:7,10 197:19 198:8 200:11,13 201:3 201:12 202:3,8 202:23 205:5,24 206:2,11,18,21 206:24 207:1,11 210:15,22 211:17 211:17 212:21 213:20,23 214:5 214:21 216:19 217:13 218:4,7,9 218:11,14 220:14 222:9,21 224:18 227:5,9 232:5,15 232:25 234:9,19 234:23 235:4,5 235:20 238:8,20 238:20 240:4,4,7 240:7,18 243:23 244:10,22 245:2 245:5,13,17 <b>thinking</b> 6:15 49:21 78:12 80:21 99:4 172:12,13 174:13 174:15,25 198:17 214:15 238:18	<b>third</b> 21:4 107:2 107:15 118:23 141:8,9 177:10 239:3 <b>thorough</b> 187:6 <b>thought</b> 18:18 23:19 36:11 47:25 52:2,7 70:6 89:2 94:6 98:18 99:1 106:18 118:1 123:15 125:7 126:12 134:8,9 140:24 155:5 162:21 165:24,25 167:11 168:15 186:18 187:2 188:20 190:6,7 193:8 197:17 198:15,15 211:23 221:17 222:6,14 226:6,12 231:5 234:8 237:19 240:13 <b>thoughts</b> 141:20 168:6 <b>thread</b> 182:19 <b>threads</b> 137:4 <b>threat</b> 224:12 <b>three</b> 15:24 18:17 21:1 70:4 95:15 95:16 110:20 111:14,23 116:22 116:23 151:5 154:2 160:12,13 160:20 161:5 166:6 172:17 202:16,19,21 205:19 225:13,15 226:3 229:2,9,10 229:25 234:2 236:22 241:19,22 242:6 244:10 <b>three-year</b> 244:6 <b>Thursday</b> 230:16 246:1 <b>Thursday's</b> 83:2 <b>tight</b> 53:1 <b>tighter</b> 124:3	<b>time</b> 2:13 4:14 5:4 5:12 10:1 14:21 18:2,5,7 19:8 20:1,4 21:17 22:8 26:25 28:21 31:11 35:16,19 42:14 46:19,24 52:2,19 53:5 58:16,17 69:11 73:20 74:6 80:1 80:18 83:18 92:14 93:8,10 98:24 99:1,16 100:12 101:9 105:9 106:20 109:22 110:9 113:7 116:10,24 119:20 120:15 126:4,8 129:4,7 129:24 132:14 133:8 140:25 141:12,18 142:6 145:12 146:17 148:10 149:23 150:5 158:15,18 159:2,14 161:16 164:16 165:12 167:19 171:3 187:16 197:18 200:21 201:7 202:15 211:7,23 214:18,22 218:2 218:12,18 219:5 221:18 222:11 227:6 228:15,19 230:23 234:20 235:12 236:21 241:15 242:11 243:5,25 245:5 245:18 <b>timed</b> 51:20 <b>timeframe</b> 39:23 125:10 <b>Timeline</b> 12:4 <b>timely</b> 88:9 121:15 125:15 <b>times</b> 67:12 71:21 103:16 128:1 144:13 154:25	168:23 218:3 222:10 241:20 <b>timing</b> 84:19 151:15 164:14 227:10 <b>tiny</b> 19:6 <b>tip-off</b> 194:7 <b>tipping</b> 66:6 160:6 160:10 <b>tirelessly</b> 22:14 <b>today</b> 77:7 114:4 129:21,23 <b>told</b> 6:6 18:1 20:5 31:18 39:23 43:19 47:6 48:20 49:5 53:25 70:13 70:15,24 80:2,5,9 80:13 84:6 89:9 89:23 91:10,12 103:3 112:20 130:14 143:21 154:5,11 155:2,4 156:14 176:23 177:3 185:12 190:24 208:20 216:14 220:20 225:8 229:11 236:21,23 238:5 <b>tolerable</b> 11:10 <b>tomorrow</b> 130:1 135:2 136:5,9 177:20 205:20 227:13,24 239:20 245:22 <b>tomorrow's</b> 225:21 <b>tone</b> 30:3 87:15 232:13 <b>tonight</b> 245:11 <b>Tony</b> 26:7 36:15 <b>top</b> 72:2 88:2 <b>topic</b> 175:18 240:24 <b>total</b> 120:8 <b>totality</b> 163:4 206:6 <b>totally</b> 147:13 <b>touch</b> 121:23 168:25 169:22	240:12 <b>touched</b> 131:23 148:22 <b>tower</b> 31:11 <b>track</b> 84:19 <b>trade</b> 27:10 87:20 <b>training</b> 37:4 <b>transcribe</b> 12:19 13:4,24 <b>transcriber</b> 73:24 <b>transcript</b> 245:11 <b>transfer</b> 161:15 <b>transgressions</b> 95:24 <b>transitional</b> 174:17 <b>translated</b> 114:17 <b>transparent</b> 135:20 226:25 <b>transparently</b> 114:8 <b>transpired</b> 62:14 <b>treated</b> 17:13 <b>triangulation</b> 84:22 <b>Triay</b> 138:21 <b>trick</b> 143:16 <b>tried</b> 4:4 122:1 134:17 153:7 <b>trigger</b> 126:24 204:2 <b>triggered</b> 108:8 <b>troubling</b> 217:9 <b>true</b> 1:20 2:5 82:17 84:8 89:15 109:19 151:9 185:6 238:20 <b>trust</b> 163:7 239:14 <b>trusted</b> 128:8 <b>truth</b> 244:15,15,16 <b>truthful</b> 244:13 <b>try</b> 78:24 187:8 237:24 <b>trying</b> 33:9 55:13 61:23 72:13,24 78:21 82:4 101:5 152:10 153:17 222:12 239:4 <b>Tuesday</b> 199:18
--	---	--	---	--

227:14	<b>Ullger</b> 37:15 50:13	<b>undertaken</b> 38:17	<b>urgently</b> 19:20	41:14 47:4 49:24
<b>Tunbridge</b> 37:16	51:4,6 53:21,24	<b>undoubtedly</b> 98:9	<b>use</b> 12:13 30:7	53:16,17 58:12
<b>turn</b> 14:9 21:4	54:3,18 204:21	98:19 140:11	31:13 32:20	60:16 64:6,8
23:25 24:1 28:3	206:8	<b>unease</b> 45:14	33:11 35:19	99:8 117:12
138:21 208:19	<b>ultimately</b> 40:20	144:17 151:17	42:16 54:7 64:15	126:10 132:12
<b>turned</b> 84:20	164:11 190:9	<b>unequivocal</b> 35:6	67:10 83:22	135:17 136:15
100:13 104:13	<b>um</b> 119:13 124:1	<b>unequivocally</b>	145:14 151:3	141:22 146:4
154:8 155:9	125:8,11,22	11:17 70:16	158:6 180:6	166:22 167:14
<b>turning</b> 15:22 45:8	126:8,9 129:4,7	103:6	181:19 184:7,12	174:19 195:16
<b>turns</b> 43:4 89:16	130:8 132:4	<b>unexpected</b> 199:18	220:13,23 221:25	197:23 199:24
<b>tweaking</b> 195:8	134:1,13,14	<b>unfair</b> 47:8 174:8	224:3,22	201:1 205:21
<b>twelve</b> 241:20	136:4,13 137:8	<b>unfolded</b> 154:16	<b>usual</b> 25:8 184:18	224:7 229:24
<b>twenty</b> 243:24	167:10,14 168:13	<b>unfortunate</b> 21:24	<b>utmost</b> 60:8	230:18,21
244:8 245:5,9,17	169:11,23 171:5	24:22 229:16		<b>views</b> 6:25 134:10
<b>twenty-</b> 244:7	176:8 179:9,22	<b>unfortunately</b>	<b>V</b>	134:16 166:19
<b>twice</b> 134:25 170:6	179:23 181:19,21	23:5 24:20 242:1	<b>v</b> 148:1 149:24	176:13 193:13
<b>two</b> 17:21 18:12	182:2,5 183:20	<b>unhealthy</b> 154:19	<b>vacancy</b> 47:1	214:14 219:17
27:19 40:1,7	185:5 186:7	<b>unhear</b> 58:16	<b>vacant</b> 4:25	<b>Vikram</b> 34:6
47:15 65:1 70:22	187:2 189:4,8	<b>uniform</b> 28:12	<b>vague</b> 66:25 95:7	<b>virtually</b> 77:12
84:10,13 93:21	190:11	<b>uninjured</b> 65:2	122:5 150:3	<b>vision</b> 85:8
95:15,23 96:4,6	<b>unable</b> 75:3	<b>United</b> 24:14	<b>valid</b> 187:13	<b>vitality</b> 94:25
97:11,25 109:18	104:10 191:7	<b>unnecessarily</b>	<b>validating</b> 131:16	<b>VN</b> 34:5
109:18 110:3	212:13,17 239:10	30:20	<b>various</b> 11:1 193:1	<b>void</b> 208:25
121:6 126:13	<b>unacceptable</b>	<b>unnecessary</b> 16:8	<b>vastly</b> 110:5	<b>volume</b> 45:5,25
132:5 137:24	130:22	16:22 17:7,25	<b>vein</b> 45:2 107:20	152:9
139:17 144:16	<b>unaddressed</b>	28:2	<b>verbal</b> 34:2	<b>vote</b> 51:5
152:18 154:12	144:24 145:5,6,7	<b>unpleasant</b> 16:17	<b>verbale</b> 113:6,8,24	<b>voted</b> 51:4
156:18 179:17	<b>uncertain</b> 70:3	28:2	114:9,16,20	<b>vulnerable</b> 212:11
195:21 196:14	235:13	<b>unread</b> 58:15	<b>verbales</b> 81:10	212:14
208:18 229:7	<b>uncertainty</b>	<b>unreservedly</b>	<b>verbally</b> 31:21	
241:19 242:6	239:10	52:15	<b>verbatim</b> 90:22	<b>W</b>
<b>two-and-</b> 18:15	<b>uncomfortable</b>	<b>unsuccessful</b> 21:13	<b>verified</b> 52:22	<b>W</b> 74:16
<b>two-fold</b> 106:11	231:20,22	<b>untaken</b> 239:12	108:3	<b>w--</b> 242:22
<b>TY</b> 65:9	<b>uncommon</b> 48:16	<b>untrained</b> 177:12	<b>verify</b> 42:7 46:8	<b>wait</b> 19:20 78:20
<b>tying</b> 102:13	<b>Under-</b> 217:23	178:11	<b>versed</b> 219:23	79:24 121:12
<b>type</b> 7:17 25:9	<b>understand</b> 3:20	<b>unusual</b> 151:10	<b>version</b> 42:25	124:17 129:23
192:24	8:23 17:15 78:16	<b>update</b> 26:17 76:4	<b>vessel</b> 4:3 82:19	194:9
<b>typed</b> 99:22,23,24	90:22 93:19	87:3 105:16,18	112:22 117:6,14	<b>waiting</b> 17:12 23:4
<b>typographical</b>	104:2 150:1	105:20 107:19	118:6,7 138:1	69:7 125:16
100:6	154:15 197:8	108:5,9 199:6	<b>vessels</b> 95:8	<b>waking</b> 20:12
<b>typos</b> 195:9	206:8 239:15	202:18 220:9	204:25	<b>walk</b> 67:4
	240:24	237:13	<b>Vice</b> 78:9 82:2,5	<b>walked</b> 67:21
<b>U</b>	<b>understanding</b>	<b>updated</b> 65:21,23	82:11	<b>walking</b> 66:17
<b>UK</b> 15:5 16:10,23	17:9 27:22 92:19	107:24 228:10	<b>video</b> 32:11 201:25	67:1,20,25 68:2
21:20 28:11 29:5	100:9 102:17,24	<b>updates</b> 65:6	206:3	167:11 238:12
39:15 47:4,12,13	103:9 198:23,24	<b>updating</b> 199:5	<b>videoconference</b>	<b>Walliker</b> 16:13
47:22,24 48:1	<b>understood</b> 27:23	<b>uphold</b> 201:3	146:9	42:22
62:2 72:10 81:8	218:1	<b>upset</b> 165:17,19	<b>view</b> 9:11 21:22	<b>Walliker's</b> 43:13
113:16 120:11	<b>undertake</b> 25:16	195:10	27:5 33:17 35:20	<b>want</b> 6:6 9:18,20
242:9,10,13,17			36:3,8,9,13,25	10:13 11:23 21:6



24:4 26:17 43:13 44:25 46:14 51:19 57:18 64:8 75:23 77:4 86:19 97:25 100:17 103:20 104:1 112:18 125:7 134:6 138:19 144:13 145:14 147:4 151:2 164:13 166:5 169:20 174:9 177:18 186:2 195:19 196:17 205:25 210:22 218:14 228:17 230:25 231:5,6 232:9 233:1 234:12 235:3,6 236:18 242:16 245:14 <b>wanted</b> 19:19 43:15 48:7 65:17 69:8 85:19 89:21 105:25 118:13,15 134:9 146:16 149:6 152:14 156:15 165:24 171:6 184:20 194:9 210:9 211:10 216:24 221:10,18,24 223:15,16 226:24 233:5 234:14 235:2 236:12 237:6 <b>wanting</b> 103:5 237:4 <b>War</b> 242:12 <b>Warning</b> 60:1 61:3 <b>warrant</b> 157:19 158:6 160:16 161:1 <b>warrants</b> 176:22 176:23 214:20 <b>wasn't</b> 35:21 47:18 53:12 71:10 79:23 80:16	104:13 111:10 130:25 144:10 149:20 150:13 160:9 162:14 167:22 185:13 189:21 190:11 216:21 219:24 224:17 231:24 238:20,23 240:20 <b>waters</b> 68:17 70:1 70:18 72:9,20 73:15 78:18 79:4 81:8,12 82:17,19 85:3 86:1,22 91:8,19 92:5,10 92:11 93:7 95:11 95:21 98:22 99:5 101:11 102:1 106:15,17 109:2 110:19 111:14 112:10,11 138:3 243:1 <b>Watterson</b> 38:6,11 38:15 39:11,13 <b>wave</b> 28:22 <b>waving</b> 68:20 <b>way</b> 6:15 7:8,18 13:6 20:12,22 23:8 32:9,18 55:16 63:22,23 74:20 77:18,20 77:21 94:7 106:3 106:7,15 114:25 129:6 131:15 141:1 143:1 150:4 152:25 161:4 162:21 164:13 165:22 167:16 168:12 170:6 171:13 174:10 177:22,24 186:22 189:14 190:5 202:3 209:17,19 216:25 217:22 221:11 222:21 224:1,22 230:14 231:17 232:3,6 235:4,22 236:12,15 238:1	239:23 <b>ways</b> 101:25 148:15 <b>we'll</b> 64:12 78:19 <b>we're</b> 64:23 76:5 81:7 87:4 98:10 102:11,13,16 166:18 226:10 <b>we've</b> 20:14 114:9 213:23 <b>weaponised</b> 138:1 206:11 <b>Wednesday</b> 1:1 111:18 155:2 211:10,21 217:17 219:2 <b>week</b> 76:6,15 166:9 191:4 199:15 208:22 <b>weekend</b> 87:5 122:24 123:3,4 126:3 166:12 220:13,24 221:21 223:23 226:4,14 <b>weekly</b> 32:11 146:8 222:17 <b>weeks</b> 18:12,16 39:14,25 40:7 42:2 210:20 222:19 <b>weeks'</b> 242:6 <b>weight</b> 137:9 150:13 161:5 235:12 243:8 <b>weighting</b> 48:16 48:18 <b>welfare</b> 69:12 <b>went</b> 38:24 67:24 109:15 128:16 131:15 132:7 138:14 157:5 158:10 165:20 167:4 180:17,21 180:23 198:13,16 201:24 218:15 236:20 237:18 238:8,11 <b>weren't</b> 151:20 174:21 213:3	<b>WhatsApp</b> 12:10 13:10 64:20 65:17 87:11 105:19 107:22 111:18 132:7 143:8 152:12 166:4 167:6 <b>WhatsApps</b> 11:22 11:22 12:1,2,8,23 12:24 13:1,14 33:11 52:8 87:13 177:8 <b>whatsoever</b> 43:3 <b>whilst</b> 24:14 33:10 43:19 48:11 66:16 133:1 183:7 191:23 199:11 224:2 237:19 <b>WHSS</b> 102:14 <b>wide</b> 115:5 <b>wide-ranging</b> 144:2 <b>wide-reaching</b> 119:3 <b>widely</b> 42:4,8 <b>wider</b> 48:12 <b>wife</b> 67:5 69:6 242:17 <b>willing</b> 141:12 217:19 243:13 <b>willingness</b> 139:22 <b>Windmill</b> 85:5,7 86:4 103:12 <b>Windy</b> 78:6 84:9 84:12,18 86:8,14 86:16 <b>Wing</b> 16:4 25:23 <b>wish</b> 36:21 46:18 58:14 240:23 <b>wished</b> 91:24 103:13 152:2 <b>wishes</b> 148:8 239:9 <b>withdraw</b> 228:17 231:1 <b>withdrawn</b> 199:25 212:6 <b>withholding</b> 92:17 <b>witness</b> 1:4,11,12	9:16,17 14:11 16:19 30:10 54:12 59:8,17,22 63:10,18 74:9 84:12 91:11 95:25 96:5,16 106:8 107:8,13 110:23 196:11,12 <b>witnesses</b> 41:25 <b>wonder</b> 73:20 167:11 202:16 <b>wondered</b> 76:3 87:2,16,21 <b>word</b> 12:21 13:5 31:13,23 42:16 52:7,13 57:20 64:16 86:19 98:11 99:10 112:19 140:10 145:15 151:3 158:6,8,8,15 163:12 165:18 169:20 170:16 174:23 186:7 188:15 211:18 216:19 234:23 <b>wording</b> 203:19 <b>words</b> 61:17 70:5 <b>work</b> 3:4,5 12:10 12:14,18 23:21 23:23 32:10 40:3 40:21 52:10 63:7 83:23 89:14 95:23 113:14 116:14 118:18 126:13 135:15 141:13 149:4 165:5 170:4 175:9 178:4,13 228:15,19 230:23 231:6 244:1 <b>worked</b> 2:20 3:9 22:13,24 129:6 141:25 176:5 178:13 231:12 <b>working</b> 20:10 170:1 242:17 <b>works</b> 32:19 154:9 201:20
--	--	--	---	--

<b>world</b> 129:4	<b>years</b> 41:5 52:9	107:17 158:20	<b>15(1)(a)</b> 121:5,15	51:22 57:6 61:11
<b>worried</b> 104:7	87:21 95:15	<b>12.15</b> 67:15	122:3,8,10	64:19 82:13
121:14 205:10	151:5 236:17	<b>12.32</b> 117:17	123:17 124:16	100:23,24 110:13
220:12,23	<b>Yeats</b> 127:6	<b>1210</b> 98:1	127:1	111:23 113:20
<b>worry</b> 106:3,6	<b>yesterday</b> 149:14	<b>13</b> 34:7 43:12	<b>15.00</b> 191:12	117:9 119:1
199:22 200:7	207:21 208:19,20	183:3,16 184:8	<b>15.15</b> 202:25	126:16 130:13
231:14	210:3	186:4,22 200:19	<b>15.2</b> 122:19 129:1	131:18 134:24
<b>worse</b> 208:20	<b>yesterday's</b> 82:15	203:7 204:13	<b>15.27</b> 203:2	139:1 142:18
<b>worth</b> 76:3 87:3,17	<b>Yome</b> 15:11 21:1	212:20 215:6,19	<b>15.40</b> 213:10	145:11 152:1
87:22 217:23	23:2 37:15	216:13,16 219:10	<b>15th</b> 114:19 172:4	154:4 168:20
222:7,15	<b>Yome's</b> 133:8	224:8,11 239:22	<b>16</b> 39:13 173:6	176:10 178:14
<b>wouldn't</b> 18:20		240:20	<b>16.15</b> 241:7	180:9 199:2
44:11 80:4 90:14	<b>Z</b>	<b>13(1)</b> 215:6	<b>16.20</b> 246:3	211:15 217:6
125:13 132:17		<b>13(1)(f)</b> 183:13,24	<b>16.3</b> 216:8	223:12 225:6
133:6 150:11	<b>0</b>	189:24 215:17	<b>16.4</b> 216:22	228:9 233:9
163:12 164:12		221:15	<b>16.42</b> 100:24	<b>2022</b> 2:11 50:23
168:2 182:2	<b>0400</b> 73:13	<b>13(1)F</b> 205:4,23	<b>17</b> 176:9	<b>2023</b> 241:3
226:20 231:25	<b>06.05</b> 65:18	206:14,16 209:16	<b>17.1</b> 223:10	<b>2024</b> 1:1 11:19
242:14	<b>07.57</b> 83:13	<b>13(2)</b> 8:22	<b>17.2</b> 223:10 224:24	246:2
<b>write</b> 33:10 36:18	<b>0757</b> 85:6	<b>13(f)</b> 229:8,22	<b>18</b> 95:13,16 110:23	<b>20th</b> 109:3
199:4	<b>09.40hrs</b> 74:13	<b>13.01</b> 142:12	111:3 178:14	<b>21</b> 110:13 127:17
<b>writes</b> 239:7,9		<b>13.33</b> 72:2	216:15	130:6 180:9
<b>writing</b> 30:7 31:22	<b>1</b>	<b>130</b> 239:2,4	<b>18th</b> 108:22	193:17 241:16,23
31:25 32:5 127:7	<b>1</b> 23:23 29:11	<b>131</b> 239:2,4	119:15 218:16	242:7,20
148:4 194:9	142:5	<b>132</b> 240:6	<b>19</b> 34:8,20,24 88:3	<b>21.1</b> 14:11
208:3 225:19	<b>1.36</b> 101:14	<b>133</b> 240:6	110:24 111:3	<b>21.10</b> 39:17
237:22	<b>10</b> 101:13 133:13	<b>1346</b> 71:25,25	120:24 121:2	<b>21.4</b> 14:24
<b>written</b> 32:3 33:12	217:2 232:8	<b>14</b> 34:8 51:22	<b>19.39</b> 135:7	<b>21.49</b> 225:18
33:13 59:13,25	233:9 246:1	146:18,23 147:4	<b>19.4</b> 87:25 88:11	<b>21.5</b> 15:23 16:20
61:2 107:19	<b>10.00</b> 1:2	148:10 151:25	<b>1991</b> 62:4	<b>21.7</b> 30:11
111:6 225:5,6	<b>10.15</b> 75:24	<b>14.00</b> 142:14	<b>19th</b> 108:22	<b>22</b> 4:23 57:5
235:8,25	<b>10.35</b> 33:5	<b>14.1</b> 178:17,18		168:19 195:14
<b>wrong</b> 19:1 20:14	<b>10.50</b> 129:16	<b>14.15</b> 143:12,13	<b>2</b>	242:11 243:23
43:5 52:2 154:1	<b>100</b> 239:16	<b>14.2</b> 182:14	<b>2</b> 77:8 224:24	<b>22(3)</b> 219:4,11
167:22 168:13	<b>1000</b> 40:11	<b>14.30</b> 167:1	<b>2.09</b> 73:6	<b>23</b> 3:22 44:22
170:14 200:12	<b>105</b> 233:6,8	<b>14:09</b> 100:23	<b>20</b> 9:21 50:23	244:1,1,9
210:23 227:2,4	<b>107</b> 234:12	<b>147</b> 59:17	106:8 110:17,23	<b>23.1</b> 56:13
<b>wrong'</b> 131:12	<b>108</b> 235:16 236:13	<b>148</b> 59:21	126:16 129:15	<b>23.2</b> 56:13 57:25
<b>wrote</b> 109:3	<b>11</b> 8:6 92:15 102:3	<b>148A</b> 21:5	<b>20.1</b> 9:16,20	<b>23.4</b> 44:22
	239:6	<b>14th</b> 152:7	<b>2006</b> 179:5	<b>24</b> 139:1
	<b>11.05</b> 75:8	<b>15</b> 12:6 33:24	<b>2016</b> 2:10 4:8	<b>24.5</b> 130:11
<b>X</b>	<b>11.11</b> 62:21	92:25 113:20	131:18 132:11,25	<b>25</b> 46:15
<b>X</b> 138:2 238:2	<b>11.25</b> 74:5	116:7,11 120:23	139:18 145:6	<b>25.1</b> 66:5
	<b>11.39</b> 74:7	120:24,25 121:1	<b>2017</b> 4:5,13 14:19	<b>25.3</b> 66:4,16
<b>Y</b>	<b>11.40</b> 76:23 77:14	121:19 122:19,21	24:3 26:14 27:16	<b>25.5</b> 76:8
<b>yards</b> 70:3,4	<b>11.47</b> 172:5	122:23 123:1,2	29:12 34:5 40:25	<b>25.6</b> 90:5 94:13
<b>yeah</b> 81:5,24 82:3	<b>11.52</b> 85:4	123:22 125:20	41:2,20 156:1	<b>25.8</b> 92:12 100:17
84:4 146:20	<b>11.56</b> 228:10	126:6 127:22	<b>2018-19</b> 150:25	<b>25.8(vi)</b> 108:20
166:16 243:24	<b>11th</b> 155:2	154:3	<b>2020</b> 5:1 6:13 10:9	<b>26</b> 151:24
244:13 245:1	<b>12</b> 29:21 41:12		11:11,16 41:7	
<b>year</b> 50:9 241:20	103:24 105:20			

<b>26.1</b> 151:25 200:15	208:10 227:7	64:19,21 72:1		
<b>26.4</b> 155:14	235:17,18	74:11 77:14 93:2		
<b>26.5</b> 156:8	<b>4.13</b> 105:21	94:1 100:22,25		
<b>26.6</b> 157:15 159:23	<b>4.42</b> 96:18	101:6 117:9		
159:25	<b>40</b> 87:21	119:1 153:21		
<b>27</b> 50:20 225:6	<b>4283</b> 195:24	233:9 239:5		
<b>28</b> 112:3 199:7	<b>45/65</b> 179:23	<b>849</b> 103:24		
<b>29</b> 16:20 111:22	<b>4676</b> 10:12	<b>85</b> 221:23		
112:12 113:4	<b>47</b> 66:1	<b>8th</b> 66:18 76:9		
115:11 118:22	<b>471(c)</b> 8:6	103:4 108:16		
134:23 199:2	<b>4743</b> 211:25			
<b>29th</b> 114:19	<b>48</b> 8:11			
	<b>4825</b> 230:22	<b>9</b>		
<b>3</b>	<b>4837</b> 229:1	<b>9</b> 6:13 26:14 60:1		
<b>3</b> 10:9 27:16,18	<b>4838</b> 228:25	61:3 73:19 75:17		
88:4 109:2 112:2	<b>4845</b> 230:3 231:18	82:13 100:24		
115:21 116:3,18	<b>49</b> 8:14	101:2,8 118:13		
116:19 118:20		119:10 153:21		
144:13 196:1,16	<b>5</b>	240:2 246:1		
225:4,22	<b>5</b> 207:19 216:6	<b>9.25</b> 207:19		
<b>3.21</b> 181:3	217:6 223:12	<b>9.30</b> 175:16 178:14		
<b>3.39</b> 117:9	225:25	<b>9.49</b> 147:5		
<b>30</b> 133:22 139:9	<b>5'12</b> 74:16	<b>9.54</b> 208:18		
<b>31(f)</b> 216:4	<b>5.30</b> 230:1	<b>9:15</b> 33:25		
<b>32</b> 109:6	<b>5.57</b> 180:9	<b>9:58</b> 51:20		
<b>3278</b> 99:12	<b>50/50</b> 170:23	<b>92</b> 107:16		
<b>34</b> 8:2 50:22 163:1	179:23	<b>95</b> 221:23		
168:9 175:25	<b>55</b> 170:21	<b>961</b> 5:21		
178:3,7,10,12	<b>55/45</b> 170:20	<b>9th</b> 34:3 75:25		
179:4 183:10	<b>5th</b> 223:13 229:11	90:5		
186:5,16,23				
187:6 188:25	<b>6</b>			
189:14 190:5	<b>6</b> 41:12 142:17			
197:18 198:9,10	227:17			
201:10 203:25	<b>6.37</b> 176:10			
212:4,25 215:3	<b>6.54</b> 74:17			
215:24 218:12	<b>6.55</b> 126:16			
237:6	<b>6.58</b> 102:3			
<b>34(1)</b> 198:5				
<b>36</b> 74:12 161:18,23	<b>7</b>			
163:16 179:14	<b>7</b> 225:20 228:9			
236:17	229:11			
<b>36'09</b> 74:16	<b>7.5</b> 112:8 120:5			
<b>37</b> 74:11	<b>7.57</b> 82:13			
<b>3947</b> 176:9	<b>7th</b> 34:4			
<b>3988</b> 190:12				
<b>3991</b> 191:1	<b>8</b>			
	<b>8</b> 1:1 11:19 14:19			
<b>4</b>	24:3,8 25:19			
<b>4</b> 196:1,16 204:16	26:19 29:11			