

INQUIRY INTO THE RETIREMENT
OF THE FORMER COMMISSIONER OF POLICE

FORMER OP DELHI DEFENDANTS' SUBMISSIONS
IN SUPPORT OF APPLICATION TO RECONVENE

I. BACKGROUND

1 At shortly before 16:30 on 26 June 2024, having heard closing submissions on behalf of all CPs, the Chairman said¹:

This brings the public hearings of the Inquiry to a close. The public hearings of course are a critical part of the Inquiry process, which allows all the participants (and indeed the public) to see for themselves that the circumstances in which Mr McGrail came to retire have been thoroughly examined.

2 It has since emerged that material bearing on the circumstances of Mr McGrail's retirement was not made available for examination during the course of those public hearings. This principally comprises instant messages between Mr McGrail and other senior members of the RGP who gave oral evidence to the Inquiry. Having received further disclosure from the RGP on 02 September 2024, yet further fresh material was served on CPs by STI on 04 November 2024, along with an invitation to file submissions on the material served.

3 The Former Op Delhi Defendants ('FDs') responded to this invitation in submissions dated 25 November 2024. These submissions concluded:

It is submitted that further inquiries need to be made of the RGP. A suitable person — probably Mr Ullger himself — must give a statement explaining why this material has been provided so late, and how it is possible to have any confidence that all other relevant material has been provided to the Inquiry by the RGP.

If this statement is provided to CPs, they can then make submissions as to suitable next steps, including the question of whether it is necessary to recall Mr McGrail and/or Mr Ullger to face further questions from CTI and/or CPs.

4 On 09 December 2024, STI informed CPs that the Government Parties had applied by letter for the Inquiry to be reconvened. STI also served yet further post

¹ Day 21, 26 June 2024, p251

hearing disclosure, including further instant messages provided by Paul Richardson, and another statement (the ninth) of Ian McGrail.

5 On 24 December 2024, STI served further disclosure from the RGP on CPs. This comprised a witness statement by Assistant Commissioner Cathal Yeats responding to questions posed by the Inquiry team, and also new instant messages between (variously) Mr McGrail, Mr Richardson, Richard Ullger, Mark Wyan and Mr Yeats himself. One of the documents (the one containing the messages between Mr McGrail’s personal mobile phone and Mr Ullger’s personal mobile phone) runs to 477 pages, albeit the majority of the messages have been redacted².

6 On 10 January 2025, the Government Parties wrote to STI confirming that they wished to proceed with the application to reconvene the Inquiry, and making further submissions.

II. SUBMISSIONS

7 The FDs support the submissions made on behalf of the Government Parties in their letters of 25 November 2024 and 10 January 2025. The purpose of the first section below is to amplify and draw the Inquiry’s attention to the submissions made in those letters of particular relevance to the FDs — it does not follow from the omission of some of the Government Parties’ submissions that the FDs disagree with the points omitted, merely that they consider that they cannot usefully add to them.

8 The FDs also have some submissions of their own. These are the subject of the second section below.

III. SUPPORT FOR GOVERNMENT PARTIES’ SUBMISSIONS

Open Justice

9 In their written submissions for the First Preliminary Hearing³ in June 2022, counsel for Mr McGrail submitted, with some force, that the important

² According to the 5th Statement of Cathal Yeats at paragraph 25, an unredacted version has been provided to STI so that the Inquiry team can carry out its own check on the work that has been done, if it wishes to do so. The FDs would be interested to know if a check has been conducted, since it appears that at least one exchange has been wrongly redacted: some of the messages that appear at p4 of Exhibit 1 to Paul Richardson’s Fourth Witness Statement (dated 03 December 2024 and served on CPs by STI on 09 December 2024) that relate to the email sent by James Gaggero at 5:44 on 10 June 2020 (see page B5201 of the Exhibits bundle) should not have been redacted in the RGP’s document “IM personal with PR Pers_redacted.pdf”, served by STI on CPs on 24 December 2024. These messages refer to James Gaggero possibly being “really worried”, and also suggest that Mr McGrail would take a different tack when talking with him face to face then in writing.

³ Dated 20 June 2022. See in particular paragraphs 50–53.

constitutional principle of open justice must be central to the conduct of this Inquiry, and that consequentially all Inquiry hearings should be open to the public and press. The Chairman substantially agreed with these submissions, saying in his written ruling following the hearing⁴ that it was “*plainly in the public interest that the evidence is disclosed, heard, and challenged, in public.*”

10 That 2022 ruling conveyed a decision to reject a submission on behalf of Mr McGrail that the proceedings be live streamed by GBC. This decision was revisited at the Fourth Preliminary Hearing in July 2023, when the Chairman indicated that he had been persuaded that his concerns in relation to live streaming could be overcome. In the course of announcing this, he said: “*I recognise, as many have submitted including the GBC, that there is a high public interest in the inquiry, that the principles of open justice strongly favour the broadcasting of inquiry hearings. If members of the public can see and hear what is being done and said, then public confidence in the inquiry and its findings is increased.*”⁵

11 The Chairman was, of course, referring to ‘the public interest’ in the sense of the welfare or well-being of the general public. But it is plain that this Inquiry attracted significant public interest of the other kind, with lengthy clips being broadcast on GBC and a significant audience watching the internet video stream both live and on catch-up⁶.

12 It is submitted that, in these circumstances, the Inquiry must have regard not only to its own assessment of the evidence as a whole, but also to the potential effect on the public of the evidence as heard by them. Where an issue of non-disclosure arises, it is not enough to ask whether proper preparation of the report necessitates the recall of witnesses or reconvening for oral submissions. The Inquiry must also consider what steps are necessary in order to preserve a high level of public confidence in the Inquiry’s work.

13 The Government Parties submit that it is necessary to reconvene the Inquiry so that the Chairman himself may have the benefit of further oral evidence and submissions, and that a process of evidence and submissions and writing would not be sufficient. The FDs support that submission: the point at which the Inquiry might safely accept an untested explanation for the RGP’s repeated failure to preserve and/or disclose material has long since passed, and it will only be (the FDs submit) after the explanations advanced on its behalf have been fully

⁴ Dated 17 August 2022, amended on 25 August 2022. The words cited are from paragraph 11.

⁵ Fourth Preliminary Hearing, 19 July 2023, p2

⁶ Following the Chairman’s amendment to the streaming protocol permitting this — see Day 06, 15 April 2024, p1

challenged that the Chairman will be able to fairly determine what consequences should flow from these myriad failures. But even if the Chairman takes the view that a written process would suffice for *his* purposes in drafting the report, such a process may fall short for the purpose of preserving public confidence in the contents of that report.

14 The FDs submit, with the Government Parties, that a written process would fall far short here. Of the reasons given by the Government Parties, they draw the Inquiry's particular attention to the risk that the public should continue to give undue weight to the submissions made and the questions asked on behalf of Mr McGrail, the RGP, and Mr Richardson in relation to missing messages, in circumstances where it is now apparent that relevant messages from and to senior officers of the RGP themselves remained undisclosed at the very same time they chose to shine a very public spotlight on certain other witnesses failing to preserve their messages from the same period in time.

15 The Inquiry will well recall the stress placed on the 'missing messages' by the police CPs, so two examples may suffice.

16 First, an example submission. In closing, counsel for the RGP said⁷ the following (emphasis added):

So the first absence relates to the judgment, right or wrong, that a search warrant was more appropriate than a production order on the evidence available at the time and the absence, the missing messages. So if on that issue you were to be looking to complete the evidence, to have before you the whole of the relevant evidence, you might want to look not just at the application and the NDM document and the full summary sent to the DPP and Mr Zamitt, but also at the messages, contemplated by the application, which it was feared that Mr Levy might be tempted to suppress if given notice of seizure, and whether those messages were ever volunteered to the police. Whether they were carefully retained because of their obvious relevance to an ongoing police investigation. Whether they were secured and copied in case there be a perfectly proper judicial review challenge to the warrants. Whether they were carefully stored with the help of the identified in-house IT experts once the Inquiry had been called for because of their, I submit, obvious relevance to your Inquiry. And whether those messages or any of them have ever been provided to you. Because if none of those things was done and if that relevant evidence is still missing and if it is and it always was obviously relevant evidence, then its absence now might lend support backwards to the police suspicion in April and May 2020 that even very powerful people, even people with very powerful reputations, may be tempted in extremis to suppress information that could embarrass themselves or their proteges. At the very least, we submit, if none of those things was done it might be harder to be confident that the police's suspicion was absurd or fanciful, that they should have known back then that a production order would of course have effortlessly completed the trail of evidence which had led them to Mr Levy and his mobile telephones. And in

⁷ Day 20, 25 June 2024, p71

relation to that first absence I finish with a question, which is: why do you think (of course you are not going to answer it now), why do you think that the messages which might have proved that Mr Levy either was innocent or that he was not, are still missing?

17 Had the failings of the RGP been known at the time that the Inquiry heard closing arguments, it is highly unlikely that counsel for the RGP would have considered it wise to make submissions of this nature. If he had done so, the effect on the public of these submissions would undoubtedly have been different, since they would have known that relevant messages between senior RGP officers were also then unavailable for scrutiny. These included messages between the present and former Commissioner of Police that were directly relevant to the Inquiry's list of issues, but had not then been disclosed, such as the following⁸:

- (1) Messages on 22, 27, 28 and 29 January 2020, 03 and 10 February 2020, 01, 05, 08 and 10 May 2020 concerning the relationship between the RGP and the Gibraltar Police Federation — issue 6.
- (2) Messages on 03, 05 and 15 March 2020 concerning the HMIC Report — issue 4.
- (3) Messages on 08, 09, 11 and 31 March 2020, and on 29 May 2020, concerning the incident at sea — issue 4.
- (4) Messages on 16 May 2020 concerning the search warrants — issue 5.

18 Secondly, an example from cross-examination by a police CP. This example is too long to cite in this document in full, but the Inquiry is invited to read from line 1 of page 193 to line 18 of page 204 of the transcript of Day 08, 17 April 2024. In this passage, counsel for Mr Richardson questioned James Levy KC about his explanations for being unable to provide copies of instant messages to the Inquiry. The exchange comprises a masterclass in the 'raised-eyebrow approach', in which it was not put directly to the witness that he was not telling the truth but (as the Court of Appeal has put it) "*the overall tenor of counsel's cross-examination was plainly designed to demonstrate that [the witness's] account was a cock and bull story, incapable of belief*"⁹.

19 The Inquiry is invited to consider how Mr McGrail might fare if he were to be subjected to questioning in a similar vein on the explanation advanced in his 9th Statement¹⁰ for his continued use of his personal phone for official business,

⁸ These examples come from the file *IM personal with RU personal redacted.pdf* referred to in the 5th Witness Statement of Cathal Yeats at paragraph 25 and served on CPs by STI on 24 December 2024.

⁹ *R v Lovelock* [1997] Crim LR 821 (CA)

¹⁰ Dated 02 December 2024 and served on CPs by STI on 09 December 2024. See in particular paragraphs 5 to 7.

namely that the new phone was a Samsung and he was not sufficiently 'proficient' in the use of the Android operating system.

20 The Inquiry might also consider the likely effect of cross-examination of Mr Ullger on his account¹¹ that "[f]or reasons that he does not understand but suspects is as a result of him purchasing a new phone in June 2020 [...] Commissioner Ullger has not been able to retrieve messages from the relevant period from his personal phone." The Inquiry will recall that a similar explanation advanced by Mr Levy was subject to trenchant criticism, some of which was reported in the press. Would these criticisms have been advanced if it had been known that Mr Ullger would be forced into a similar admission? If they had been advanced would they have had the same effect?

Goose v Gander

21 The Government Parties' submissions refer to the 'dog that did not bark'. The FDs would add another animal metaphor: what is sauce for the goose, is sauce for the gander. James Levy KC, Fabian Picardo KC and Lewis Baglietto KC were liberally 'sauced' by the police CPs in connection with disclosure failings, both actual and assumed. It would assist the Inquiry in assuring fairness to all concerned before reaching its conclusions to see the police witnesses face the same challenge, and would risk undermining public confidence in the Inquiry's conclusions if they were not to.

IV. FDs' OWN SUBMISSIONS

Involvement of Ian McGrail in Op Delhi

22 It has been the FDs' case from the outset that Mr McGrail's involvement in Op Delhi was greater than he chose to admit:

- (1) The written opening on behalf of the FDs noted the unusual manner in which Op Delhi had commenced (a private meeting between Mr McGrail and James Gaggero) and referred to the passages in Mr McGrail's witness statements where he had claimed that after receiving James Gaggero's complaint he had "passed the matter on to a team headed by Superintendent Richardson" whereafter his involvement in Op Delhi had been limited to "periodic briefings ...

¹¹ Advanced for him by Mr Yeats at paragraph 5 of his 5th Statement dated 20 December 2024, served by STI on CPs on 24 December 2024.

from Superintendent Richardson” and “requesting assistance from the ... National Crime Agency.”¹²

- (2) In his oral opening, leading counsel for the FDs said, referring to Op Delhi¹³:

Mr McGrail's degree of involvement is another issue. Some allowance can be made for the fact that in a smaller jurisdiction with a relatively smaller police force, a Commissioner of Police may be more operationally involved than he would be in the Metropolitan Police by way of example, if he so chooses. But far from stepping back from Op Delhi as he suggests, we say the evidence shows that Mr McGrail continued to play an important role in it, driving it forward, particularly in terms of trying to persuade a reluctant Government to adopt his case theory, or should I say Mr Gaggero's case theory.

23 Many of the messages disclosed since Mr McGrail gave his oral evidence during the main hearing have been relevant to this issue of his involvement. For example:

- 10 May 2019 Mr McGrail asks Mr Richardson to call James Gaggero to tell him that Tommy Cornelio, John Perez and Eddie Asquez have been arrested.¹⁴
- 09 May 2020 Mr McGrail forwards to Mr Ullger a message of praise from James Gaggero.¹⁵
- 14 May 2020 Mr McGrail asks Mr Richardson to let him know when he has “felt [Caine Sanchez’s] collar”.¹⁶
- 16 May 2020 Mr McGrail and Mr Ullger refer to the possibility that James Levy may “force the issue” such that he has to be arrested.¹⁷
- 16 Jun 2020 Mr Richardson and Mr McGrail discuss an email that Mr McGrail has received from James Gaggero.¹⁸

¹² See witness statement bundle at {A4} and {A12}

¹³ Day 02, 09 April 2024, p107

¹⁴ “Ian McGrail WhatsApp curated .pdf”, served by STI on CPs on 09 December 2024, p3. This message also appears in other sources.

¹⁵ “IM personal with RU personal redacted.pdf”, served by STI on CPs on 24 December 2024, p401.

¹⁶ “Ian McGrail WhatsApp curated .pdf”, served by STI on CPs on 09 December 2024, p5. This message also appears in other sources.

¹⁷ “IM personal with RU personal redacted.pdf”, served by STI on CPs on 24 December 2024, p418.

¹⁸ “IM personal with “PR Pers_redacted.pdf”, served by STI on 24 December 2024, p15. This message also appears in other sources.

23 Jun 2020 Mr McGrail (post-retirement) asks Mr Richardson whether an interview under caution with Caine Sanchez conducted that day “went well”.¹⁹

Loss of Evidence

24 The FDs have already observed²⁰ that the messages between Mr Ullger and Mr McGrail demonstrate that their relationship was exceptionally close, such that it would be plainly inappropriate for one to have conduct or oversight of any kind of investigation into the other.

25 This is a matter of concern when it is the force now led by Mr Ullger that has been investigating the loss and/or destruction of material which might reasonably be expected to have been preserved, and which might have assisted the Inquiry, or proven to be disclosable unused material in the prosecution that arose out of the Op Delhi investigation.

26 The list of such items has grown during the main Inquiry hearing and subsequently, as further tranches of late disclosure have been served by the RGP. The Schedule annexed to this document summarises the present position, but it remains both concerning and confusing.

27 It will be for the Inquiry to determine what conclusions can be drawn from the updated position as to the extensive loss and destruction of evidence from those trained to preserve evidence; it is submitted that the stage has been reached when this task cannot be properly undertaken without hearing further oral evidence from Mr McGrail, Mr Ullger and Mr Yeats. To do so without a necessary further short hearing would risk undermining public confidence in any conclusion that the Inquiry might draw (or not draw) from this.

Communications With or About James Gaggero

28 The FDs have already observed²¹ that late disclosure of this kind provided by the RGP will inevitably undermine confidence in the disclosure processes of the party that provided it, because it is impossible not to ask what else may not yet have been disclosed that should have been and why the most basic pre-hearing prerequisites to allow for a fair Inquiry hearing are still ongoing.

¹⁹ “WhatsApp chat between Ian McGrail NEW and Paul Richardson for period 1.1.20-30.6.20 .pdf”, served by CTI on CPs on 09 December 2024, p1

²⁰ In their “Submissions re RGP Disclosure of 04 November 2024”, dated 25 November 2024, at paragraph 3.

²¹ In their “Submissions re RGP Disclosure of 04 November 2024”, dated 25 November 2024, at paragraph 5.

29 As their written evidence to this Inquiry sets out²², the FDs have always believed that James Gaggero exerted, through Mr McGrail, an undue influence on the Op Delhi investigation. In circumstances where a central plank of Mr McGrail's allegations is of improper pressure from a different source, this is relevant to issue 5 in the Inquiry.

30 STI's requests to the RGP have thus far focused on messages sent or received after 01 January 2020. This will not capture messages relating to the genesis of the investigation. The RGP must now search the records they have (and in particular the image of Mr McGrail's personal mobile phone, obtained in the criminal investigation and given reference JSH/03) for all messages relevant to Op Delhi, including in particular any messages to or from James Gaggero or other senior Bland employees, or which mention James Gaggero or Bland.

V. CONCLUSION

31 For the reason set out above, the FDs support the application to reconvene the Inquiry, but ask that before it is reconvened further disclosure is made by the RGP or an independent disclosure process is put in place to ensure it can be relied upon this time .

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17 January 2025

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²² See the affidavit of John Perez dated 24 January 2023 at paragraph 83, A1252 in the bundle of witness statements.

INQUIRY INTO THE RETIREMENT
OF THE FORMER COMMISSIONER OF POLICE

ANNEX TO FDs' SUBMISSIONS OF 17 JANUARY 2025
SCHEDULE OF DELETED, DESTROYED OR MISSING
MATERIAL AND/OR DEVICES

MATERIAL / DEVICE	EXPLANATION PROVIDED	REFERENCE
<p>Ian McGrail's ("IM") daybooks and pocket books spanning his entire RGP career</p>	<p>"Mr McGrail informed Mr McVea and the other officers that he recalled having left his day books and old pocketbooks in a "Royal Caribbean Cruises" rucksack which was left in the Commissioner's office at New Mole House."</p> <p>"In his response of the 4th May 2024 Mr McGrail stated that at the time of his retirement his daybooks had been left in his office in a rucksack. He said that he had corresponded with, and asked SIO McVea to locate the daybooks in relation to another matter. I have asked SIO McVea for the result of that search and he has informed me that the daybooks were not found."</p> <p>"I am not able to provide any more assistance as to the whereabouts of my day-books."</p> <p>"That the RGP were unable to find the day-books leading up to my criminal trial in June last year and have still been unable to find them is not as a result of any actions of mine."</p>	<p>Letter from Charles Gomez & Company dated 4 May 2024 served 20 June 2024 with Cathal Yeats' 4th Witness Statement</p> <p>Fourth Witness Statement of Cathal Yeats dated 20 June 2024</p> <p>Para 6 of Eighth Affidavit of IM dated 20 June 2024</p> <p>Para 11 of Eighth Affidavit of IM dated 20 June 2024</p>
<p>Hard copy documents retained by IM relating to Op Delhi post his retirement. These documents were subsequently destroyed by IM</p>	<p>"Q. Mr McGrail said in evidence that he had retained some papers that he had taken from New Mole House before the RGP had attended his premises and that he destroyed some of those paper documents. Has the RGP ascertained what those documents which were destroyed were? Not that I know of, no."</p> <p>"A. I did not destroy any documents other than under the direction and request of the RGP."</p>	<p>Richard Ullger Transcript Day 13 p137-139</p> <p>Para 12 of 8th Affidavit of IM dated 20 June 2024</p>

MATERIAL / DEVICE	EXPLANATION PROVIDED	REFERENCE
RGP issued phone (and data contained therein) used by IM up until retirement	<p>“When I retired on 9th June 2020 I left the Samsung device together with the work laptop behind at New Mole House. I did not retain any data pertaining to this phone.”</p> <p>“An analysis of both phones has revealed that neither of the phones now believed to have been in the possession of Mr McGrail, and in the possession of Mr Richardson, were in fact in use by them at the time. It is possible that the phones in use by both Mr McGrail and Mr Richardson remain in use within the RGP but with different telephone numbers. A forensic examination of every phone in the RGP would be required to determine whether the RGP has messages in its possession or control from Mr McGrail and Mr Richardson’s work phones in 2020.”</p>	<p>Para 8 9th Statement of IM dated 2 December 2024</p> <p>Para 18 of Cathal Yeats’ 5th Witness Statement</p>
RGP issued phone (and data contained therein) used by PR during the relevant period	<p>“Sometime before commencing pre-retirement leave in May 2021, I returned my work issued mobile iPhone and SIM card with subscriber number [...]. Individual users did not have access to an Apple ID for managing their work phones which were wiped once they were returned. The only phone I was able to search for messages to disclose to STI was my personal phone.”</p> <p>“An analysis of both phones has revealed that neither of the phones now believed to have been in the possession of Mr McGrail, and in the possession of Mr Richardson, were in fact in use by them at the time. It is possible that the phones in use by both Mr McGrail and Mr Richardson remain in use within the RGP but with different telephone numbers. A forensic examination of every phone in the RGP would be required to determine whether the RGP has messages in its possession or control from Mr McGrail and Mr Richardson’s work phones in 2020.”</p>	<p>Para 4 of Paul Richardson’s 4th Witness Statement dated 3 December 2024</p> <p>Para 18 of Cathal Yeats’ 5th Witness Statement</p>

MATERIAL / DEVICE	EXPLANATION PROVIDED	REFERENCE
RGP issued laptop (and data contained therein) in use by IM up until retirement	<p>“The RGP does not have a policy to image the hard drives of desktop or laptop computers when officers who use them retire or leave the service...”</p> <p>“DC Alfred Garcia examined the laptop [found in retired Inspector Paul Barker’s office] to determine whether it was in use by Mr McGrail at the time of his retirement and whether the draft of the email of the 12th May 2020 was contained within. DC Garcia has confirmed that the laptop was in use by Mr McGrail in May 2020 but has been unable to find the email of 12th May 2020.”</p> <p>“During his oral evidence, on 30th April 2024, Commissioner Richard Ullger stated that he was unable to identify the whereabouts of my official RGP desktop computer and laptop. I see from Mr Yeats’ statement of yesterday’s date that the laptop has been found but not the desktop computer; there is a suggestion in Mr Yeats’ email to Mr Wyan of the 28th April 2024 at 7:08pm that it is possible that the Government’s Information Technology & Logistics Department (“ITLD”) may have taken it (see Exhibit CY/WS4/14). I can confirm that I did not keep the desktop computer or the laptop. I left both the desktop computer and the laptop in the Commissioner’s office at New Mole House police station before my departure from the police on 9th June 2020.”</p>	<p>Para 8 of Cathal Yeats’ 4th Witness Statement dated 20 June 2024</p> <p>Para 17 of Cathal Yeats’ 4th Witness Statement dated 20 June 2024</p> <p>Para 5 8th Affidavit of IM dated 20 June 2024</p>
RGP issued desktop computer (and data contained therein) used by IM up until retirement	<p>“During his oral evidence, on 30th April 2024, Commissioner Richard Ullger stated that he was unable to identify the whereabouts of my official RGP desktop computer and laptop. I see from Mr Yeats’ statement of yesterday’s date that the laptop has been found but not the desktop computer; there is a suggestion in Mr Yeats’ email to Mr Wyan of the 28th April 2024 at 7:08pm that it is possible that the Government’s Information Technology & Logistics Department (“ITLD”) may have taken it (see Exhibit CY/WS4/14). I can confirm that I did not keep the desktop computer or the laptop. I left both the desktop computer and the laptop in the Commissioner’s office at New Mole House police station before my departure from the police on 9th June 2020.”</p>	<p>Para 5 8th Affidavit of IM dated 20 June 2024</p>

MATERIAL / DEVICE	EXPLANATION PROVIDED	REFERENCE
Richard Ullger's ("RU") messages from his personal phone during the relevant period	"For reasons he does not understand but suspects is as a result of him purchasing a new phone in June 2020 (refer to email 28 June 2024 timed at 13:05 contained in Exhibit CY/WS5/1) Commissioner Ullger has not been able to retrieve messages from the relevant period from his personal phone, (this includes other persons with whom he regularly corresponds)."	Paragraph 5 of Cathal Yeats' Fifth Witness Statement dated 20 December 2024

17 January 2025