

**SPECIAL COMMISSION OF INQUIRY
INTO MATTERS RELATING TO THE POLICE INVESTIGATION OF
CERTAIN CHILD SEXUAL ABUSE ALLEGATIONS IN THE CATHOLIC
DIOCESE OF MAITLAND-NEWCASTLE**

At Newcastle Supreme Court
Court Room Number 1, Church Street, Newcastle NSW

On Thursday, 27 June 2013 at 9.45am
(Day 14)

Before Commissioner: Ms Margaret Cunneen SC

Counsel Assisting: Ms Julia Lonergan SC
Mr David Kell
Mr Warwick Hunt

Crown Solicitor's Office: Ms Emma Sullivan,
Ms Jessica Wardle

1 MR HUNT: Good morning, Commissioner. I can't enumerate
2 them, but there have been a number of requests from the
3 media for exhibits that have been tendered in evidence
4 since the PIC complaint by Ms McCarthy which was, I think,
5 the last item that was released. If those at the Bar table
6 could let myself, Mr Kell or Ms Lonergan know by the end of
7 morning tea whether there's a difficulty with the release
8 of any of the more recent exhibits, that would be helpful.

9
10 THE COMMISSIONER: Thank you, Mr Hunt.

11
12 MR HUNT: I now recall Detective Chief Inspector Humphrey.

13
14 THE COMMISSIONER: Good morning, Mr Humphrey.

15
16 MR HUNT: Mr Cohen was in the midst of his
17 cross-examination when the witness was last in the witness
18 box.

19
20 THE COMMISSIONER: Thank you, Mr Cohen.

21
22 MR COHEN: It was extraordinary what occurred overnight,
23 Commissioner. Thank you.

24
25 THE COMMISSIONER: A good day for Queenslanders.

26
27 MR COHEN: It would seem to be.

28
29 <WAYNE DAVID HUMPHREY, sworn: [9.30am]

30
31 <EXAMINATION BY MR COHEN:

32
33 MR COHEN: Q. Detective Chief Inspector Humphrey, are
34 you ready?

35 A. Good morning, Mr Cohen.

36
37 Q. Thank you. Are you ready, sir?

38 A. Yes, sir.

39
40 Q. Very well. I regret in the circumstances you may need
41 to cast your mind back a little because there were a few
42 interruptions that weren't anticipated, but yesterday we
43 had reached a point where a series of propositions had been
44 put to you. I want now to move back to your statement so
45 that my first question is: I take it, you have a copy of
46 your statement there.

47 A. I have a copy, yes.

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Q. Could I ask you, please, to have regard to paragraph 17 in your statement. It is a lengthy document and, indeed, it refers to annexure B. Would it assist you to read it and have a quick reference to the annexures before I ask you questions?

A. Yes, that's fine.

Q. Would you do that? I want to ask you a number of questions about it.

A. (Witness does as requested). Yes, Mr Cohen, I've read those.

Q. Thank you, detective inspector. You've identified in the body of the paragraph extracted the material that formed the term of reference, but it is the first term of reference, is it not, not the second?

A. That's right.

Q. You focused upon the first. Can I ask you is it not the case that you were focusing, for these purposes, on the wrong term of reference there? Isn't the one that matters the second term of reference?

A. Well, I suppose that's a matter for the Commission to decide. That was led in my statement. That's the one I discussed. I suppose, again, it comes down to determining what it's relevant when we're making the statement compared to what's evolved now.

Q. Let me put this proposition to you very squarely so we understand each other. Is it not the case that the substantial work and the detailed work of Strike Force Lantle occurred on and from the time of the amended terms of reference being adopted or being executed?

A. I would agree with that, yes.

Q. Is it not the case, therefore, that the one that matters - this is the question really I'm getting to: does not the term of reference, for these purposes that matters, is it not the one that is the second part of your annexure B, the second document, the one that identifies Detective Sergeant Little as the officer in charge?

A. Yes, I would say so, but I don't know what you're getting at here. I'm sure I'll find out.

Q. It will all become clear. You understand that the terms of reference themselves provide the boundaries of the

1 investigation; that's a fair statement, isn't it?
2 A. It sets the parameters, yes.
3
4 Q. Rather, like for us lawyers, pleading a cause of
5 action that sets out the facts of what is to be focused on;
6 that's a fair --
7 A. But you're predicating that that can't be moved,
8 though.
9
10 Q. I'm not suggesting it can't be, but unless and until
11 it is, that's what you work from, isn't it?
12 A. It sets out the parameters of the investigation, but
13 there are times that you might have to go outside the terms
14 of reference.
15
16 Q. The terms of reference that first arose talked about
17 concealment of serious offences but had no time period
18 identified. You would accept that?
19 A. I should say I've had nothing to do with the
20 compilation of either document, so you're only asking my
21 opinion I presume on this, are you?
22
23 Q. I'm just asking you, for these purposes - given your
24 experience, you would be accepted as an expert in the
25 field - this process is a formal one and this set of terms
26 of reference really are what give --
27 A. I understand. I want to be clear on my ability to
28 comment on --
29
30 Q. Go to annexure --
31 A. -- something that was done by somebody else.
32
33 Q. Go to annexure B?
34 A. I am.
35
36 Q. Look at the first page of the first term of reference,
37 apart from the direction - this is to Detective Sergeant
38 Steele - and apart from the formal direction to take
39 command of the Strike Force Lantle, the terms of reference
40 are, as you see them there, on about the first third of the
41 page?
42 A. Yes, that's right.
43
44 Q. You've identified those in your statement and
45 reprinted them there?
46 A. I did. I did.
47

1 Q. But you didn't reprint them for the other term of
2 reference?
3 A. No. That document speaks for itself.
4
5 Q. I see. On that footing, you will agree with me, won't
6 you, that the second term of reference does two things at
7 once: it broadens the ambit of the concealment offences -
8 that's the first element. Do you agree with that?
9 A. Yes, I would.
10
11 Q. Sorry?
12 A. I would, yes.
13
14 Q. And the second element is that it materially narrows
15 the time period. Do you agree with that?
16 A. Yes - well, it predicates the time period.
17
18 Q. Yes.
19 A. The first one did not.
20
21 Q. Quite. Given the sorts of offences contemplated -
22 that is to say, as it goes on to, in each case, identify
23 stemming from complaints made by various people - in the
24 second term of reference, there is one additional set of
25 complaints identified first. There are three people in the
26 first term of reference, four in the second?
27 A. Yes.
28
29 Q. So that that is the factual basis upon which the
30 complaint is identified and the --
31 A. It appears to be, yes.
32
33 Q. Is it not the case that, in the circumstances of these
34 amended terms of reference, that's the time period - and
35 I'm asking this as a conceptual question, not that you had
36 anything to do with this, although I think there is some
37 suggestion that you may have been involved in reviewing
38 these terms of reference before they were settled, we'll
39 come to that. But at the threshold conceptually, would it
40 not have been better that there would be no time period
41 constriction like this?
42 A. I couldn't say that was the case because I don't know
43 what evidence Detective Sergeant Little, Jeff Little's
44 review of the holdings had indicated. There may have been
45 some specific reason, but this is a question you have to
46 put to DI Parker. I can't - I'm not prepared to comment.
47

1 Q. Don't you say in your statement - and correct me if I
2 am wrong --

3 A. What paragraph was it again?
4

5 Q. This is 17. You say that the first terms of reference
6 were settled by Detective Sergeant Steel and were approved
7 by the then crime manager Detective Chief Inspector Tayler.
8 That's uncontroversial.

9 A. Yes.
10

11 Q. And then you identify them in a formal sense. And
12 then you say:
13

14 *Annexed to this statement and marked with*
15 *the letter "B" are the terms of reference*
16 *for Strike Force Lantle as initially*
17 *formulated and signed by Detective Sergeant*
18 *Steel together with the terms of reference*
19 *as subsequently signed by Detective*
20 *Sergeant Little.*
21

22 That's the second part.

23 A. Yes.
24

25 Q. In 19 you go on to say:
26

27 *Before personnel were assigned and the*
28 *terms of reference were settled ... I had*
29 *discussions with other senior police*
30 *officers in relation to how the*
31 *investigation was to be conducted, as well*
32 *as matters generally.*
33

34 I take it that fixes the time when you were the acting
35 commander of the Newcastle LAC; is that right?

36 A. I don't think it would fix totally there, but that
37 would be primarily there.
38

39 Q. I'm trying to be fair to you as to timing and why you
40 were involved.

41 A. I appreciate that. Thank you.
42

43 Q. I'm grateful. Therefore is it fair to understand, as
44 it would seem to be implicit in this second document of
45 your evidence, that you did have something to do with
46 settling or approving or commenting upon at least the
47 second - that is, (Little) - term of reference?

1 A. No, I wouldn't agree with that. I would have had some
2 input in my discussions and handover with Detective
3 Inspector Parker certainly, but once Detective Inspector
4 Parker took his position up, part of that entire project
5 was understanding who was responsible for what.

6

7 Q. Yes, indeed.

8 A. And I was not responsible for that.

9

10 Q. Quite. But the discussion that you identify in
11 paragraph 19 presumably included some discussions about
12 what were the terms of reference and what they ought to be?

13 A. I don't recall there being any specific conversation
14 about the exact wording of the terms of reference. It was
15 about getting an investigation plan, my view on who should
16 be interviewed as part of that - and I've been very clear
17 in my evidence so far about that, I think - and general
18 matters about resourcing. I can't recall the exact
19 conversation, but at the end of the day, Detective
20 Inspector Parker and Detective Sergeant Little are
21 responsible for that. I can't comment on it any further.

22

23 Q. Is it not the case that the dates that ultimately were
24 selected that went into this second term of reference -
25 that is, between '85 and '99 - are quite arbitrary?

26 A. I have no idea.

27

28 Q. If one has regard to, if I may describe it, the
29 Townsend report - that's the document of 12 July 2010 to
30 which I took you yesterday?

31 A. Yes I recall.

32

33 Q. You know the one I'm referring to?

34 A. Yes, I do.

35

36 Q. That is Inspector Townsend's review of all the facts
37 and circumstances and what was effectively suggested?

38 A. He is a barrister he puts together a fairly good
39 document.

40

41 Q. I'm glad to hear it. I take it that that document
42 then went to the Assistant Commissioner York and that
43 ultimately led to her forming a view of the world. But my
44 point is: is it not the case that the term of reference as
45 it finally was settled really just plucked arbitrarily a
46 number of dates out of the document without much science
47 involved?

1 A. Again, I can't say because I didn't do it. I didn't
2 prepare that document.

3

4 Q. Very well. Again the proposition I want to put to you
5 conceptually, not that you were involved in it, but
6 I assume you can express what must be an expert opinion in
7 the circumstances?

8 A. You keep going "expert". I'm just doing my job.

9 I don't know whether I'm an expert at anything. An opinion
10 is --

11

12 Q. Forgive me. So that it is clear, I'm thinking of the
13 definition of the Evidence Act which, given your specific
14 knowledge and training presumably, presumably --

15 A. It hasn't been established I guess, but I'm happy to
16 give an opinion for you.

17

18 Q. All I'm asking is this: having regard to this term of
19 reference and having regard to the facts, matters and
20 circumstances that Inspector Townsend identified in his
21 report, it is rather arbitrary just to constrain the period
22 of time, is it not, given that many of the offences of
23 concealing may have occurred from, say - and appear on the
24 face of it to have occurred from - the mid-70s and indeed
25 may well have gone on well past 1999? Was it not sensible
26 just to keep the period, as it were, unstated and
27 open-ended?

28 A. I can't agree because I don't know what Detective
29 Sergeant Little's review at that stage had established was
30 evidence that could support the allegation.

31

32 Q. You wouldn't dispute the fact that there could easily
33 have been concealment offences occurring after 1999?

34 A. I'm sure there probably - no, I'm not sure, but I can
35 see that; there could be. There would be some specific
36 reason that those dates were put in. I'm not party to why
37 those dates were put in. I have no knowledge of why they
38 were. So I can't help you, Mr Cohen, I'm sorry.

39

40 Q. Very well. You made mention in a number of occasions
41 in your statement to - I think it fair to describe them as
42 this - the views of senior officers of the command. That's
43 right, isn't it, in your statement?

44 A. In regards to what?

45

46 Q. On various occasions you've made mention of senior
47 officers having discussions or expressing views and you've

1 taken, for your purposes, some heed of those opinions?

2 A. Yes.

3

4 Q. I'm not trying to pin you down to a particular item,
5 but I'm asking that you accept that you are informed in
6 part, especially at the time you were the acting commander,
7 by the views of others in the command?

8 A. Absolutely, yes.

9

10 Q. We are agreed about that.

11 A. I'm sure we'll agree about much more.

12

13 Q. I'm delighted to hear that again. Can I ask you,
14 please, do you have volume 1 there handy, of the bundle?

15 A. Yes, I do.

16

17 [Transcript suppressed from page 1453, line 17, to
18 page 1455, line 6]

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MR COHEN: Q. The question is: it was the case at this time, and by "this time", I mean May, June, July, August September of 2010, the period when these issues were evolving - do you understand that proposition?

A. I understand, but I wasn't even at the command in May so I can't make any comment on what --

Q. When did you get there?

A. June.

Q. June to September 2010?

A. Yes. It was late June, probably --

Q. This is the question --

A. -- more July.

Q. -- and the Commissioner will consider it first. In this period when you were there, June onwards to September at least, there was a view in the command amongst senior officers that it was not a good idea to confront and take on the senior members of the Roman Catholic Church?

THE COMMISSIONER: That's a statement, Mr Cohen, for starters.

MR COHEN: I'll ask the question.

Q. Is that the concerns that were abroad in the command?

THE COMMISSIONER: Q. Are you able to answer that, sir?

A. I can say that I have no knowledge, no-one said anything like that to me. I'll contextualise that as I was a duty officer initially starting. I was not part of any decision-making process in relation to that investigation, and the first time that I knew we were getting the file back, there was no reluctance on my part specifically. I'm happy to take on the Catholic Church - happy.

MR COHEN: Q. It was also at this time, that is, June, July, August, September, this period that is relevant to you being the acting commander, or at least the duty officer and then acting commander - that's right, isn't it?

1 A. I'm just getting my timeline so can I speak with some
2 accuracy on dates for you.
3
4 Q. To what are you referring there may I ask?
5 A. It was submitted. It's a Gant chart to say who was
6 doing what during what period.
7
8 Q. I'm not sure I've ever seen that. Is that in your
9 statement?
10 A. No. It was given to the Commission. If you don't
11 want me to look at it, that's fine, but I can't answer any
12 of your questions.
13
14 Q. The difficulty is this, if you're looking at something
15 that I've not seen I can't really ask you questions about?
16 A. Fine. I'll put it away. My answers are now
17 restricted to "I guess."
18
19 MR SAIDI: I think there is a misunderstanding. Mr Cohen
20 is asking questions. If the witness wants to refer to a
21 document to be accurate with the answers, he should be
22 permitted to do it. Just because Mr Cohen hasn't seen
23 it --
24
25 THE COMMISSIONER: Mr Cohen, I gather it is a document
26 which indicates the dates upon which this particular
27 witness took particular appointments and particular
28 positions.
29
30 Q. Is that right, sir?
31 A. Yes, it is, Commissioner. It refers to a number of
32 police when they were there and when they left. It has an
33 aide-memoire and it was given in the tender bundle that
34 requested from day one.
35
36 MR COHEN: I have no doubt about that. It's just that I
37 have never seen it. I have no clue what it says or means.
38 That is my difficulty and I'm hesitant to embark on a
39 one-sided cross-examination.
40
41 THE WITNESS: Commissioner, I'm happy not to refer to it,
42 but obviously my answers will now be very restricted to.
43
44 THE COMMISSIONER: Mr Cohen, surely it would be
45 unobjectionable for a witness in the position of this
46 witness to have a look at a document that shows the
47 movements of particular staff, including himself.

1
2 MR COHEN: Without question. I would just like to be let
3 in on the secret. That's all.
4
5 MR HUNT: It is not a secret. I've just been shown it
6 now. I'm happy to show a record to Mr Cohen.
7
8 Q. Just for the record Detective Chief Inspector Humphrey
9 you have another folder of material there?
10 A. Yes, I have.
11
12 Q. Would you put that down for a moment?
13 A. Am I allowed to have that document?
14
15 Q. Have the Gant, or whatever it's called --
16 A. Yes, and put the other one down?
17
18 Q. -- but put the rest out of reach, if you would.
19 A. Okay, fine.
20
21 MR HUNT: It is certainly not meant to be a secret --
22
23 THE WITNESS: No, no.
24
25 MR HUNT: -- it was something that those assisting the
26 Commission did not think was of sufficient utility to
27 serve.
28
29 THE COMMISSIONER: Yes, thank you.
30
31 THE WITNESS: My apologies.
32
33 MR COHEN: With no disrespect to those assisting you,
34 Commissioner - just the opposite; I have enormous respect
35 for their industry and ability - I was astonished to know
36 that this might have been a document that was material and
37 hadn't got out of the bundle, so to speak.
38
39 Q. Excuse me, Detective Chief Inspector Humphrey. I need
40 a moment to absorb this material.
41
42 THE WITNESS: I'm sorry, Mr Hunt. It appears I've caused
43 a ruckus again.
44
45 MR COHEN: Q. I take it, was this produced or prepared
46 by you?
47 A. No, at my direction, and it accords with the records

1 of my memory, the best I can, but like any personnel
2 record, there may be a day or two out.

3

4 Q. Quite.

5 A. I had an analyst prepare it. I have a number of
6 analysts that work for me.

7

8 Q. Indeed, and I assume its purpose was to show for the
9 relevant senior officers identified what I'd call a
10 chronology or a timeline that, in a charted form, showed
11 periods where they were doing various tasks. Is that its
12 purpose?

13 A. It was just - yes, it indicates who was doing what at
14 any particular period, to the best that we can determine
15 from existing records. It helped clarify my mind because
16 at different times I'll have different responsibilities and
17 different jobs.

18

19 Q. Quite. Excuse me. Allow me to put this to you: if
20 I understand this document correctly, it records for your
21 purposes that from 29 June 2010 to 30 August 2010, you were
22 the Newcastle City LAC duty officer.

23 A. One of them, yes.

24

25 Q. Then from that date, 30 August 2010 or perhaps the
26 next day, 31 August?

27 A. Whatever the Monday fell on.

28

29 Q. Whatever the barrier time is?

30 A. Yes.

31

32 Q. Through to 13 October 2010, you were the, I assume,
33 relieving commander of the LAC?

34 A. That's correct.

35

36 Q. The Newcastle City LAC?

37 A. That's right.

38

39 Q. And then back to duty officer from 13 October to
40 1 November 2010?

41 A. Yes, that's right. But bear in mind that, in those
42 periods, even though it might say that I am the duty
43 officer or between that period, I may have taken leave.
44 I would have to check diaries to see whether I was actually
45 at work, but it's my --

46

47 Q. But the substantive work, the substantive job at the

1 time was at the LAC?

2 A. Yes, that's right.

3

4 MR HUNT: Could I pause for a little bit of housekeeping.
5 I'm sorry to interrupt my friend's flow, but I am wondering
6 whether the document that Mr Cohen has could be marked for
7 identification.

8

9 THE COMMISSIONER: Yes.

10

11 MR HUNT: I'm disinclined to tender the document for
12 various reasons, but given it is forming part of the
13 questioning, it ought to be identified.

14

15 THE COMMISSIONER: Thank you, Mr Hunt. MFI7.

16

17 **MFI #7 DIAGRAMS DATED 2010 AND 2011 RE DATED FOR VARIOUS**
18 **OFFICERS PREPARED AT REQUEST OF DETECTIVE CHIEF INSPECTOR**
19 **WAYNE HUMPHREY (GANT CHART)**

20

21 MR COHEN: I don't seek to have it tendered, but in
22 fairness to the witness this clarifies the position. If
23 I can, in this simple way, I read it on to the record so
24 that everyone understands the basis.

25

26 Q. I think I took you from 13 October 2010 to 1 November
27 2010 when you were back as one of the duty officers in the
28 substantive role for that period?

29

A. That's right.

30

31 Q. Then from 1 November to 10 November, again the
32 relieving commander of the LAC?

33

A. For a short period.

34

35 Q. Yes. Then from 10 November through to 20 December,
36 again duty officer?

37

A. Yes, that's right.

38

39 Q. Then I assume from 20 December 2010 you commenced
40 substantively as the crime manager or one of the crime
41 managers?

42

A. No.

43

44 Q. No?

45

A. 25 December.

46

47 Q. I'm so sorry. I just have one date there, 20 December

1 on the --
2 A. Is it the date that I - oh, no, that's Trevor Shields.
3 20 December, sorry. I do apologise, yes.

4
5 Q. Not at all. And from that time on --
6 A. I was the sole crime manager then until the arrival of
7 Mr Parker, which was some time after we returned from
8 Christchurch in March of 2011. But, of course I was in
9 Christchurch - do you want to take me through the rest of
10 the dates? I'm doing your job here.

11
12 Q. No, not at all. That was the period that you
13 identified and I wanted to be sure about. I'm grateful for
14 that. My question, having identified that period: in one
15 role or another during that period, the entirety of the
16 period from 29 June 2010, you were attached in one form or
17 another to the Newcastle LAC?

18 A. That's right.

19
20 [Transcript suppressed from page 1460, line 20 to page
21 1461, line 13]

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MR COHEN: That's a convenient point if could I return that document and allow that to be marked, which is now MFI7.

MR HUNT: Yes.

THE COMMISSIONER: Are you continuing on in that vein, Mr Cohen?

MR COHEN: No, that might be a convenient spot to do that.

THE COMMISSIONER: The last question and answer will be subject of a non-publication order. Thank you Mr Cohen.

MR COHEN: The MFI has been dealt with, has it?

THE COMMISSIONER: That's MFI7.

MR COHEN: Thank you very much, Commissioner.

Q. It might not be fair to say that the Strike Force Lantle file gathered dust until the end of calendar 2010, but not much happened, did it?

A. Oh, I don't know. I didn't have responsibility for it. There seemed to be some activity on e@gle.i. there were certainly some attempts to interview [AL], I think it is, but I can't comment on what Detective Sergeant Steel and Detective Chief Inspector Tayler were up to specifically.

Q. You have given evidence in your statement that, around about this time, there was a discussion between journalist Joanne McCarthy and Inspector Fay Dunn.

1 A. That was the phone call, yes, that I had with
2 Inspector Dunn. There'd been a phone call, contact of some
3 description, I'm not sure, but certainly there had been
4 some form of communication.

5
6 Q. That phone call, on your evidence - in your evidence
7 yesterday, you were questioned by Mr Hunt about the
8 circumstances of the Fay Dunn telephone conversation. You,
9 in your evidence, in fact, in fairness to you, let me go to
10 it, indicated - it was put to you that by Mr Hunt that it
11 was an extraordinary set of coincidences that an article
12 was published by Joanne McCarthy - do you remember this
13 evidence?

14 A. I'm just waiting to hear the rest of it.

15
16 Q. Let me go through it in fairness. The question was.

17
18 *... extraordinary set of coincidences that*
19 *the article is published --*

20
21 I interpose there that that's the McCarthy article.

22
23 *your complaint is made; there's a meeting*
24 *at which suddenly you discuss with*
25 *Assistant Commissioner York the necessity*
26 *to interview Fox relative to Lantle; and*
27 *then he's interviewed within days in*
28 *relation to the internal investigation.*

29
30 A. That's not relevant to the phone call of Fay Dunn.

31
32 Q. The Fay Dunn phone call, that was a prompt for all
33 this, wasn't it?

34 A. No, not at all. 12 October, Fay Dunn made the phone
35 call and then I go and get the file. The meeting Mr Hunt
36 questioned me on yesterday occurred much later. That's
37 when DI Parker there and Mr Galton.

38
39 Q. Well, let's go back to the Fay Dunn phone call because
40 12 October is much earlier. You're saying she was suddenly
41 searching for a file because of a call from Joanne
42 McCarthy; is that right?

43 A. I've just said --

44
45 MR SAIDI: I object. I object on the basis of the
46 fairness of the question. This is a very delicate area
47 because I need to refer to material which is not before the

1 Commission and it has been ruled to be confidential.
2 Pardon me, I would like to mention something to Mr Hunt
3 about this.

4
5 (Mr Saidi and Mr Hunt confer)

6
7 MR SAIDI: We'll see where it goes. I'm just concerned
8 about the question.

9
10 THE COMMISSIONER: Thank you, Mr Saidi.

11
12 MR COHEN: I will endeavour --

13
14 THE COMMISSIONER: Try to remember what it was, Mr Cohen?

15
16 MR COHEN: No, that's not the problem. I'll just now
17 endeavour to walk through this minefield with the blindfold
18 on and hope I don't step the wrong way. It is very
19 difficult, Commissioner, to know exactly what the
20 difficulty I'm creating is.

21
22 THE COMMISSIONER: Well, I assure you I don't know. Would
23 you please continue.

24
25 MR COHEN: Yes.

26
27 Q. Let's approach it this way and let's go to documents
28 that are in evidence, so that unless there's a hidden trap
29 there, we're all safe from the difficulty.

30 A. I'm sure we'll soon find out, Mr Cohen.

31
32 Q. Could I ask you to have regard to volume 2, please, of
33 the bundle and if you would go to tab 62 there.

34 A. Yes.

35
36 Q. Do you recall yesterday that you identified this as
37 part of the green; it was the document that arose out of
38 the ministerial --

39 A. I perceived this. I never saw the green personally.

40
41 Q. But you accept --

42 A. Yes.

43
44 Q. -- ostensibly this is part of it? I can do no better
45 than that.

46 A. Yes, and I accept it 100 per cent.

47

1 Q. That document - I understand you haven't seen it, but
2 it's been given a TRIM number, it is in the system, it
3 relates to this issue - forms part of what you say
4 Inspector Dunn was exhorting you on the phone to look for;
5 is that right?

6 A. I presume it was, yes.

7

8 Q. I'm very curious, because the document itself says,
9 does it not, that the matter was forwarded for information
10 and referral to the relevant command for consideration and
11 appropriate attention. Then it goes on to say, at the foot
12 of the page:

13

14 *Please note that the Ministerial Liaison*
15 *Unit does not require a report in relation*
16 *to this matter.*

17

18 That couldn't possibly have been something that would cause
19 the great fuss and excitement and the panic you identified
20 in Inspector Dunn, surely?

21 A. I don't know about panic, but if you coupled with it
22 with the documents Mr Hunt showed me yesterday in respect
23 of, I think, an email that was sent to Inspector Dunn, it
24 is not about whether we are replying to the ministerial, it
25 was - I perceived Inspector Dunn wanted to see what was in
26 the file so she could brief the region commander and
27 prepare a response to the email that Ms McCarthy had sent.
28 That was the tenor of the phone call.

29

30 Q. Did Inspector Dunn say to you, "I want a file which
31 has that TRIM number 2010/133845?"

32 A. No, no, she said, "There's a green. Can you get the
33 green and anything that goes with it that can help me
34 answer this question?" That's to the best of my memory.

35

36 Q. That green was identified --

37 A. She might not have used the term "green", Mr Cohen.
38 That was my term, but, yes, I knew what she was talking
39 about.

40

41 Q. If she didn't use the term "green" - which is
42 shorthand for a ministerial request, I assume --

43 A. I made some notes. I think it said "ministerial".
44 She may have said "ministerial", but --

45

46 Q. The question I want to put to you is this: Inspector
47 Dunn would not even have known of the existence of this

1 file, would she, at the time? This is at 12 October?
2 A. She must have. She rang and asked me about it.
3 I don't know. You'd have to ask her.
4
5 Q. You're saying your understanding was that
6 Inspector Dunn rang you because she had received a phone
7 call from Joanne McCarthy about this topic?
8 A. That was my belief.
9
10 Q. Ms McCarthy couldn't have known about the existence of
11 the file either, could she?
12 A. I don't know.
13
14 Q. The chain of events that you contend led up to this
15 request by Inspector Dunn was just fanciful, wasn't it?
16 A. No.
17
18 Q. Isn't it more likely that, just as was put to you
19 yesterday by counsel assisting, Mr Hunt, this was just
20 giving colour to the background as a pretext to search
21 Detective Chief Inspector Fox's office?
22 A. Did Mr Hunt put that to me yesterday?
23
24 MR SAIDI: Was that put by Mr Hunt yesterday?
25
26 THE WITNESS: I don't recall it being put.
27
28 THE COMMISSIONER: I don't recall it being put.
29
30 MR COHEN: Let me withdraw that and let me check. I
31 thought it was, but let me be - I don't want to be unfair
32 to anyone.
33
34 MR SAIDI: For what it's worth, let me positively assert
35 it was not put.
36
37 MR COHEN: I think that must be right. I withdraw that.
38
39 THE COMMISSIONER: Thank you, Mr Cohen.
40
41 MR COHEN: Q. Close that bundle now and I'll take you
42 back to your statement, in particular, to your statement at
43 paragraph 21(d). Now, this is one of the two paragraphs
44 that became somewhat controversial yesterday. In any
45 event, you refer in that paragraph in the second line to,
46 as you put it, "despite numerous requests". What were the
47 "numerous requests" you were referring to there? That's a

1 general narrative statement --
2 A. It was a broad statement, yes, it was.
3
4 Q. What are the particular --
5 A. That's information I'd received from Detective
6 Inspector Parker and Detective Sergeant Little and I think
7 also Detective Senior Sergeant Quinn, although I can't be
8 100 per cent certain on that.
9
10 Q. That's information you got from them, but what
11 requests did they identify to you that they say had not
12 been satisfied?
13 A. I can't remember specifics. It was a general comment,
14 "we've asked for material and he's not giving it over."
15
16 Q. Wasn't that general comment just sheer speculation.
17 There was no substance to it?
18
19 MR HUNT: I object to that. That question posits this
20 witness having the knowledge of what was going on in the
21 minds of others.
22
23 MR COHEN: I'll withdraw it and put it another way.
24
25 THE WITNESS: Thank you.
26
27 MR COHEN: Q. You just had no basis for knowing when you
28 wrote that sentence in 21(d) that any of this was other
29 than sheer speculation?
30 A. No, I don't agree with --
31
32 MR SAIDI: I object. I object to the use of the
33 terminology "sheer speculation" in particular in terms of
34 the evidence that has emerged. It is anything other than
35 sheer speculation.
36
37 MR COHEN: I would say one more time, post hoc, ergo
38 propter hoc. We're talking about 2010, not 2013.
39
40 MR SAIDI: Could you interpret that for me? I'm not going
41 to bring out my Latin book. Please interpret it.
42
43 MR COHEN: It means that which follows does not cause it.
44
45 MR SAIDI: I maintain my objection. I don't care what the
46 Latin phrase is.
47

1 THE COMMISSIONER: Mr Cohen I think the problem is about
2 speculation and, no, I won't permit you to put there was
3 speculation only.
4
5 MR COHEN: I'll approach it this way.
6
7 Q. To what document can you refer to make good on that
8 assertion in 21(d)?
9 A. None that spring to mind.
10
11 Q. That's because there are none; isn't that right?
12 A. I don't know. I know I sent a request for documents
13 to be surrendered. That weren't as of 2 December, but that
14 paragraph you're referring there, as I said earlier, is a
15 broad statement that encompasses the whole.
16
17 Q. Just stop there. The documents that you said to be
18 surrendered as at December were the documents in the
19 ministerial file, weren't they?
20 A. Yes, "and any other relevant documentation" I think
21 I worded it. I'd have to see the email.
22
23 Q. We'll come to that. I put to you that what you sought
24 was the ministerial file?
25 A. And any other relevant documentation.
26
27 Q. To the ministerial file?
28 A. Yes.
29
30 Q. That is to say, the one I've just shown you behind
31 tab 62?
32 A. Well, I never saw it, so I can't say. Relevant
33 documentation in relation to an investigation and
34 concealment of child sexual offences by the Catholic
35 Church, I think that is a fairly wide ambit.
36
37 Q. You refer in that paragraph as well to your intention
38 to debrief Detective Chief Inspector Fox so a comprehensive
39 investigation could be planned and conducted?
40 A. It wasn't my plan to personally debrief him, but
41 I thought he should have been debriefed, yes.
42
43 Q. Well, an intention. This is speaking as at a period
44 from October to December 2010, isn't it?
45 A. Oh, it's a general comment.
46
47 Q. But "at the time", you must have mean that period,

1 surely?
2 A. I believe he had evidence material to the
3 investigation, yes.
4
5 Q. So we're clear, this intention for him to be debriefed
6 in your mind as you had testified about it yesterday,
7 related to this period of October, roughly, to December
8 2010, did it not?
9 A. Yes. I would say then, yes. Probably stronger later,
10 but clearly he had some information. It would be foolish
11 not to see what it was.
12
13 Q. The debrief would, in the vernacular, be getting one's
14 heads together; is that right?
15 A. No, not necessarily.
16
17 Q. I'm sorry, I missed that.
18 A. No, not necessarily. That's a term that infers many
19 things. My interpretation of a debrief would be what
20 material do you have, do you have any evidence that's
21 relative and material, take a statement --
22
23 Q. But a physical process --
24 A. If you want to call it heads together you can call it
25 that. I don't necessarily agree.
26
27 Q. It would certainly be a physical process where people
28 sat down together --
29 A. Oh, yes.
30
31 Q. -- in the same room, in a conference room? Wherever
32 it was, you did in perhaps a formal way, but in the company
33 of each other?
34 A. I would like to think so, yes.
35
36 Q. Yes.
37 A. Unless there was some reason that either party
38 couldn't get together and then you could scan an email, and
39 things like that, but in the normal course of events --
40
41 Q. But absent great physical distance?
42 A. Yes. Yes, I would expect to get together, absolutely,
43 at the appropriate time.
44
45 Q. You've annexed some documents to your statement, in
46 particular, in annexure C to the statement, and these
47 appear in various places in the bundle. I'm afraid I don't

1 have the cross-references for the convenience of others,
2 but in your statement, it is convenient to you, detective
3 chief inspector. Do you see in that email that you've
4 sent, principally, to Detective Sergeant Steel and also
5 copied to Detective Chief Inspector Tayler and to
6 Superintendent Mitchell and Inspector Townsend, in the
7 third line you say:

8
9 *'Getting our heads' together --*

10
11 You're quoting back from Detective Chief Inspector Fox's
12 phrase --

13
14 *with Peter Fox will not necessarily be the*
15 *most advantageous strategy despite his best*
16 *intentions.*

17
18 That speaks for all time, doesn't it, not just --

19 A. It actually confirms what I've just said. Getting our
20 heads together is not the right way to approach this. It
21 should be formal.

22
23 Q. That means not getting together at all, doesn't it?

24 A. No, that's your interpretation, not mine.

25
26 Q. Isn't that the only interpretation you can put on
27 those words?

28 A. No, not at all, not in my view, anyway.

29
30 Q. You go on to say:

31
32 *Lastly, Fox will address communications*
33 *through the Crime Manager in future.*
34 *I will address that.*

35
36 And then he's on four weeks leave:

37
38 *I look forward to some robust discussion on*
39 *this matter.*

40
41 Does that mean with Fox?

42 A. No, Tayler.

43
44 Q. Well, if you're not going to get together, if there's
45 not going to be a getting together of heads and you're
46 looking to robust discussion, surely the only construction
47 you can put on that document is he is never to be involved;

1 isn't that right?
2 A. No, that's ridiculous. Absolutely not. Absolutely
3 not.
4
5 Q. Did you look at the various materials in the file at
6 the time of having this discussion in September of 2010
7 that's referred to in broad terms?
8 A. Which file?
9
10 Q. If you look at your email, that contemplates, does it
11 not, the file has come back in the direction of the
12 commander to the Newcastle LAC? That's correct, is it?
13 A. I presume it was. I didn't see it.
14
15 Q. That file is what I'm referring to and, so it is clear
16 in your mind, I took you to a document yesterday that had
17 two TRIM numbers on it?
18 A. Yes, I remember.
19
20 Q. That file, and indeed, that file, again so defined, is
21 what gets a jersey in the Townsend report?
22 A. Yes.
23
24 Q. Focusing on that one?
25 A. That one, yes.
26
27 Q. That definition, that file means those materials in
28 that report and associated with it. Excuse me, Detective
29 Chief Inspector Humphrey, excuse me, Commissioner.
30
31 In the email that you've identified in annexure C,
32 your last comment to everyone is, "I look forward to robust
33 discussion on this matter." My question I'm going to put
34 to you, after identifying the file, is "this matter" means
35 the file, does it not, in broad terms?
36 A. No. More to the fact that what we perceived would
37 occur had occurred and how we were going to manage that.
38
39 Q. You say "what we perceived would occur had occurred",
40 but all that had occurred was that Detective Chief
41 Inspector Fox had written a memorandum that he'd sent to
42 Detective Sergeant Steel?
43 A. Exactly what we thought would happen - some type of
44 contact early once she was assigned on to the case.
45
46 Q. But, with respect, so what? It was a perfectly proper
47 email that indicated --

1 A. It would be if there wasn't a strong suspicion that
2 the Herald was behind it as well or getting information
3 from Detective Chief Inspector Fox. You seem to ignore
4 that fact. That was what was operating on my mind and
5 particularly Tayler's.
6

7 Q. I'm not ignoring anything at all, what I am trying to
8 put, and I'll put it to you directly now, is that there was
9 just an antithetical approach towards Detective Chief
10 Inspector Fox because everybody suspected that he was the
11 bad guy when he was, in fact, not anything of the sort;
12 that's so, isn't it?
13

14 MR SAIDI: I object to the question. I think there needs
15 to be some definition of what "bad guy" means, if my friend
16 wants to re-put the question.
17

18 THE COMMISSIONER: Yes.
19

20 MR COHEN: Q. You are making the proposition to the
21 Commissioner that Detective Chief Inspector Fox is the
22 leaker in all this, aren't you? That's what's implicit in
23 all your evidence, isn't it?

24 A. That was the belief, yes, absolutely
25

26 Q. The belief was founded on nothing but a puff of the
27 breeze, wasn't it; is that right?

28 A. We've been down this road yesterday, Mr Cohen.
29 I don't agree with that assertion at all.
30

31 Q. There was just not a proper basis for holding that
32 belief on any --

33 A. A suspicion is not based on belief.
34

35 Q. With respect, it is, is it not?
36

37 MR SAIDI: I object to the question. I object to the line
38 of questions. Indeed, I object to the argument about the
39 definition of "belief" and "suspicion" and the rest of it.
40 In terms of relevance, if I can get to the point, what is
41 the relevance of this, now that we know, with the benefit
42 of hindsight, the evidence before this Commission that the
43 suspicion referred to by the witness was completely and
44 absolutely accurate? Why is this being pursued?
45

46 THE COMMISSIONER: We have gone through it before,
47 Mr Cohen. Was there anything that would you like to put to

1 wrap-up the subject area?

2

3 MR COHEN: I tried to put it and there was a vociferous
4 objection. Do you rule the question out?

5

6 THE COMMISSIONER: I think the last question was - I don't
7 have it, actually, but do you recall what it was?

8

9 MR COHEN: What I was endeavouring to put was that there
10 was not a proper basis for Detective Chief Inspector Fox to
11 be suspected of anything, let alone being a leaker.

12

13 Q. That's right, isn't it?

14 A. No, there was.

15

16 MR COHEN: I'll finish this with one more question,
17 Commissioner on this topic.

18

19 Q. The proof of the pudding in this proposition: as at
20 this time, that is to say, 18 September 2010, what had been
21 leaked?

22 A. In relation to this --

23

24 MR SAIDI: I object. How would this witness know, as of
25 that date, what communications, whether by telephone, email
26 or otherwise - what had been leaked? He is being asked as
27 a fact what had been leaked. How would he know? It was
28 all done in secret between Fox and McCarthy.

29

30 THE COMMISSIONER: It is difficult to answer. Where were
31 we?

32

33 MR COHEN: The objection, again in vociferous terms, about
34 whether or not this is a proper question to put and the
35 assertion from the Bar table that it's been demonstrated
36 that there was leaking going on.

37

38 THE COMMISSIONER: Yes. You've asked what was leaked by
39 that time.

40

41 MR COHEN: It seemed a proper question to me.

42

43 MR SAIDI: The question, to make it proper and anywhere
44 near proper, was, "What was the suspicion", not "What was
45 leaked?" I'm sorry for my vociferous approach.

46

47 THE COMMISSIONER: It is an impossible question for this

1 witness to answer, is it not, Mr Cohen? You could ask him
2 did he know anything that was leaked. Is he aware --

3
4 MR COHEN: I thought I had. Let me do that. I thought
5 the answer was "No" to that question.

6
7 Q. What was it that you had identified that gave you the
8 material that gave you the suspicion that there had been a
9 leak?

10 A. There had been - I have to be careful here. There had
11 been articles in relation to this and other matters which
12 helped me form my suspicion and, as I understand, that was
13 a suspicion that was also strongly held by DCI Tayler.

14
15 Q. We went over this ground yesterday, I'm sorry, but
16 I need to press you on this. You say articles, plural.
17 Please identify the articles?

18 A. I can't.

19
20 Q. Why not?

21 A. Not here now. I can't.

22
23 [Transcript suppressed from page 1473, line 23, to
24 page 1474, line 1]

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Q. Why was there not a formal complaint made about this in September 2010?

A. Sorry?

Q. Why was there not a formal complaint in the system made about this in September 2010?

A. Because the suspicion didn't amount to enough to complaint about it. By the time the complaint went in later, in light of the phone call and the file note, there was enough.

Q. I put it to you, detective chief inspector, there was no suspicion, just a dislike of DCI Fox?

A. No, not at all. Not at all.

Q. I put it to you that your evidence in your paragraph 22 of your statement about concerns for the integrity of the investigation equally are invention for the purposes of this Commission?

A. No, they are not.

Q. And the true position was that this was an opportunity to get Fox, wasn't it?

A. For what purpose, Mr Cohen? There's no reason to get Fox.

Q. To get him out of the Police Service?

A. Do you want me to answer?

Q. You were asking a question. I'm putting it to you that this was to get DCI Fox --

A. No.

Q. -- out of the Police Service?

A. No. Why would I want him out of the Police Service?

Q. Please don't answer with an answer; answer my question.

A. Well, it is a nonsense question. I had no control over Mr Fox at all, nor did I want to. There would be no reason why I would want to get him out of the police service. He is ambivalent to what I do, superfluous. Like, he's doing his job, presumably, and I'm trying to do mine. You want to paint some, or your client does, some suspicious or sinister motive and it is just nonsense.

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[Transcript suppressed from page 1475, line 2 to page 1477,
line 10]

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MR COHEN: Q. The complaint that was made in the first instance instituted by materials you provided to the Newcastle LAC in, I think it was April 2010 - am I right about that? That's what commenced complaint?

A. I haven't got the documents, but I think that complaint was in 2011, wasn't it? It was to the region commander.

Q. I beg your pardon. You're quite right; it was April 2011, but the documents were provided by you, either to the region or LAC?

A. Yes, hand delivered to the region commander.

Q. That commenced the complaint. That dealt with, on its face, the circumstances of the events of 2 December 2010, did it not?

A. It made reference to it, as far as I can remember, yes.

Q. You weren't at that meeting, were you?

A. No.

Q. Surely in the circumstances the proper complaint was Commander Mitchell, wasn't it?

A. What do you mean "the proper complainant"?

Q. I'm sorry, I didn't --

A. I don't understand the question.

Q. The complaint was about circumstances of the meeting and asserted failure to comply with the direction. That was the complaint?

A. We went down this road yesterday, didn't we? The complaint was about my belief, based on documentation that I received, that there was an improper association with a media person. It was not --

1
2 Q. But the complaint?
3 A. The triage identified it being a disobeyed direction.
4 I don't know. I wasn't at the meeting.
5
6 Q. And that complaint properly was the province of
7 Commander Mitchell, wasn't it?
8 A. No.
9
10 Q. He was at the meeting, he understood what he said, he
11 was the man with the interest in his statement being
12 conformed to, he was the proper complainant in this; wasn't
13 he?
14 A. No, for two reasons: one my line commander at that
15 time was Assistant Commissioner York; and the second was
16 Mr Mitchell was gone. He wasn't the commander. He was in
17 Melbourne working with the Victorian Police.
18
19 Q. I put it to you that Commander Mitchell was the proper
20 complainant, but you stepped in as his proxy?
21 A. Proxy for what?
22
23 Q. The complaint?
24 A. I made the complaint.
25
26 Q. So he didn't have to make it?
27 A. I'm sorry?
28
29 Q. So he did not have to make it personally?
30 A. He was in Melbourne. I don't know - I don't know what
31 you're getting. I made the complaint. I made the
32 complaint on the basis of the telephone call and file note
33 I received from DI Parker and some of my suspicions.
34
35 Q. There is a file note in your statement which is dated,
36 on the face of it, 19 April. This is annexure G. I think
37 you've indicated it was hand delivered on 21 April 2011.
38 A. It is actually dated 21 April where I signed off.
39 That's the more accurate date. The way the macro works on
40 that letterhead, if you don't remember to change that since
41 the last time you'd used it --
42
43 Q. The reason I identified it that way is that there are
44 two documents that have the date 21 April. In fairness, in
45 annexure G, the first in time even allowing for your
46 evidence of yesterday, the first page of annexure G
47 identifies a document at the position on the letterhead

1 that says 19 April?
2 A. Yes. Yes.
3
4 Q. So we're clear that's the page?
5 A. Yes, that's the one.
6
7 Q. The other document that bears the date 21 April is
8 annexure H?
9 A. That's right.
10
11 Q. So there's no confusion for the Commissioner's
12 purposes if she has to review this from the transcript --
13 A. Yes.
14
15 Q. -- it is understood that you signed it on the 21st,
16 but, for ease of identification, annexure G at the top says
17 19 April. That's one way of identifying it?
18 A. Yes.
19
20 Q. That document, that, in effect, is a file note? Well,
21 how would you describe it? It doesn't have a title, but it
22 is effectively a file note, isn't it?
23 A. Annexure G? I would say it is more a status report.
24
25 Q. However you want to label it, that was based upon the
26 earlier file note status report, again, whatever label is
27 appropriate, of Detective Inspector Parker of 14 April, was
28 it not?
29 A. No. Well, it could have been, I suppose, in part.
30 The one that was basis of the foundation is annexure H from
31 Parker's, but this one was bringing Commissioner York, as
32 I recall, at her request, up to speed, where it was at.
33
34 Q. You accept, don't you, that when this was first
35 recorded by Parker, his knowledge, as he states it, was
36 very limited?
37 A. Knowledge about specifically what?
38
39 Q. Strike Force Lantle? He'd just come into the job,
40 hadn't he, in the LAC?
41 A. What date is this? It was April.
42
43 Q. Early April?
44 A. Could have been.
45
46 Q. He says, doesn't he, very clearly, his knowledge was
47 very limited about Strike Force Lantle?

1 A. I don't recall what he says, but I accept what you're
2 saying.

3

4 Q. Your evidence yesterday, as I recall it, was that you
5 got a phone call from him on this day, 14 April, and you
6 testified to the Commissioner that, when he was on the
7 phone, in terms speaking to you, he was, to use your phrase
8 "livid"?

9 A. Yes, he was pretty cranky.

10

11 Q. If he had a limited knowledge of these matters of
12 Strike Force Lantle, then it was difficult to have also any
13 knowledge about DCI Fox in these matters, wasn't it?

14 A. Oh, you'd have to ask him. I don't know what his
15 knowledge was of DC Fox in those matters. I was aware
16 he would have been - I briefed him about the earlier parts,
17 which we've discussed. And I don't know how limited his
18 knowledge of the Lantle brief was. I don't know what he
19 knew exactly, but I knew he was cranky when he got the
20 call, or when I took his call, I should say.

21

22 Q. It is the case, isn't it, that he wasn't cranky about
23 DCI Fox, was he?

24 A. No, I don't agree with that.

25

26 [Question and answer suppressed]

27

28

29

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31

32

33 Q. I put it to you that this is the view that was adopted
34 by senior officers in the Newcastle LAC that anything that
35 Fox does is a leak and anything that he does is going to
36 put the investigation at risk. That's the approach that
37 was taken, wasn't it?

38 A. No, it was probably a major concern, but I wouldn't
39 say everything.

40

41 Q. Proof wasn't required for that view to be formed. It
42 just had to have the name Fox attached to it, didn't it?

43 A. No, no, it was not like that at all.

44

45 Q. This was all being recycled into your document
46 provided to the region commander to be able to poison the
47 well; that was what was going on, wasn't it?

1 A. No, it was not.
2
3 Q. Your proposition that Detective Chief Inspector Fox as
4 at April 2011 was a leaker had this serious difficulty,
5 hadn't it, he had been off with a broken leg for four
6 months from the job?
7 A. I'm not sure how long he had been off, but him being
8 off work doesn't mean he's still not in contact. I think
9 that's been clearly evident as well.
10
11 Q. You just have no proper basis to recall that, do you?
12 A. I had a suspicion. It became much more solidified
13 after that telephone call between McCarthy and Parker and
14 at that stage, after much soul searching, the complaint
15 went in.
16
17 Q. This is the chronology is it: Fox broke his leg
18 in December 2010?
19 A. I don't know when Fox broke his leg.
20
21 Q. He's off work for four months or more, but McCarthy
22 phones Detective Inspector Parker about something - Aha!
23 It is Fox's fault. That's the thought line, isn't it?
24 A. Look, I can't comment. I didn't have the conversation
25 with Joanne McCarthy. You would have to ask Mr Parker. If
26 that is what you say the timeline is, so it is.
27
28 Q. The notion that Fox could be responsible for any of
29 this is just preposterous, isn't it?
30 A. No.
31
32 Q. The real position, the real problem here, at this
33 point in time in April 2011, is that the region were
34 petrified that there was going to be bad publicity on the
35 front page of the Newcastle Herald. That's what the
36 concern was, wasn't it?
37 A. I don't know. You would have to ask whoever was in
38 region at that time. It is no secret we're always attuned
39 to media, but you would have to ask them. I wasn't at
40 region. And it goes on to another step too. Talk about --
41
42 Q. No, don't go there.
43 A. I haven't finished my answer. You asked about what
44 was on the front page of the paper. What probably --
45
46 Q. No, with respect, I simply said --
47 A. Okay.

1
2 Q. -- the proposition was keeping this off the front page
3 of the Herald. That doesn't need to be expanded upon.
4
5 THE COMMISSIONER: The region was petrified, Mr Cohen.
6
7 THE WITNESS: You took me to the front page. There's a
8 lot of risks about what goes in the front page in an
9 investigation, particularly in relation to victim care.
10
11 MR COHEN: Q. The real concern was just to avoid bad
12 publicity because it is bad for the image --
13 A. I have no idea what --
14
15 Q. It was that simple, wasn't it?
16 A. No, I have no idea. You can make that proposition,
17 but I can't agree with it.
18
19 Q. The conduct of Lantle, or at least of the holdings of
20 Lantle by your predecessor in the role of crime manager,
21 you described in quite disparaging terms to the region
22 commander, didn't you?
23 A. Yes, I did.
24
25 Q. And your use of the phrase was because the situation
26 was just a shambles, wasn't it, at this time?
27 A. No, it wasn't a shambles, no. That's not what I've
28 given evidence about.
29
30 Q. Abysmal management but not a shambles; is that what
31 you say?
32 A. Of the holdings.
33
34 Q. And the holdings are what drive the investigation,
35 aren't they?
36 A. No, not necessarily. The holdings form different
37 parts. I also gave evidence yesterday, and I repeat it
38 again now, that the e@gle.i seemed okay. But the paperwork
39 was not how I would expect it to be presented. Why that is
40 it I can't comment, but I didn't like the way it was left.
41
42 Q. This was your comment upon the capabilities of
43 DCI Tayler, wasn't it?
44 A. No, because I don't know whether he had carriage of
45 the folder or Detective Sergeant Steel.
46
47 Q. One of those two?

1 A. It would be, yes. But as I said yesterday, every one
2 of us of my profession in this room do things differently
3 and my subjective view was that I was not happy with what
4 I was handed and it needed organisation as soon as
5 possible. Maybe I'm a bit linear. Other people look at
6 things differently.

7
8 MR COHEN: I'm close to the end, Commissioner, I just want
9 to check my notes to see that I hadn't overlooked anything.

10
11 THE COMMISSIONER: Thank you, Mr Cohen.

12
13 MR COHEN: Q. In your evidence yesterday, you asserted
14 to the Commissioner that DCI Fox continually tried to take
15 over Lantle. Now, the true position was that DCI Fox wrote
16 one memorandum in September 2010 and then was directed to
17 deliver up documents and had nothing more to do with
18 Lantle. That's the true position, isn't it?

19 A. He was directed up - to give the documents. He had
20 nothing formally to do with it, no, that's right.

21
22 Q. He didn't try to take over Lantle. There was nothing
23 he could do. He was directed to give up documents and have
24 nothing else to do?

25 A. Well, I don't know whether directions have any meaning
26 to Mr Fox, but I don't resile from the comment. He was
27 trying to inject himself in and take it over.

28
29 Q. That sort of gratuitous comment is just directed to
30 blackening DCI Fox's reputation?

31 A. No, it's my opinion. You asked the question and
32 I answered it.

33
34 Q. There was nothing he could do to take over Lantle, was
35 there?

36 A. That's two different questions.

37
38 Q. The evidence that you gave about that is just
39 hyperbole, isn't it?

40 A. No.

41
42 MR COHEN: Thank you, Commissioner.

43
44 THE COMMISSIONER: Thank you, Mr Cohen.

45
46 Yes, Mr Irving?

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<EXAMINATION BY MR IRVING:

MR IRVING: Q. I have a note that, on Tuesday, you said word to the effect you wanted to get Lantle to get going?

A. Yes, I recall something along those lines.

Q. Can we draw from that that Lantle, wasn't going?

A. There was no-one on it at the time I took it. Everyone had gone off sick, so there was a short period, I guess.

Q. Just from the form of words you used, you appeared somewhat frustrated?

A. I wouldn't say I was frustrated, but to put it into context, Lantle was the only brief I picked up and, accordingly, there was a lot to get my head around. Lantle was important and I wanted it to get going, yes.

Q. Just go to April 2011. There were a fair few things happening with Lantle at that time. Ms McCarthy published an article, and it is at page 528 in document 111.

A. Which bundle?

Q. Number two.

A. What number was it again?

Q. Document 111 at page 528.

A. That's it - 528, sorry, yes.

Q. She makes a number of assertions in that article, but would you accept that one of them is that, after 12 months, in effect, not much had happened?

A. Oh, that's a - I couldn't have a view.

Q. I'm not asking you about the investigation. I'm asking you that's her assertion?

A. Yes, that's the assertion in the article, without reading the whole article, I would accept that.

Q. Would you accept that proposition?

A. Yes.

Q. Could I take you, then, to a memo that I'm sure you're familiar with, number 101.

A. Yes.

1 Q. Just on the very first page, you make the observation
2 in the second paragraph:

3
4 *There had clearly been a period prior to*
5 *the commencement of this Strike Force where*
6 *numerous commands had knowledge of the*
7 *allegation and had seen fit for reasons*
8 *unknown to me at this time not to commence*
9 *an investigation.*

10
11 A. That's right.

12
13 Q. Impliedly, you can draw from that that it didn't go
14 anywhere for a while?

15 A. I think it was going between commands. There was
16 trying to be a decision on who would take --

17
18 Q. The investigation didn't go on for a while?

19 A. Yes.

20
21 Q. You would accept that as a proposition?

22 A. Yes, absolutely.

23
24 Q. Could I go then to the sentence before that. You make
25 the observation that when Lantle was established in
26 October, "inquiries were to take the form of review,
27 assessment of current holdings and initial inquiries to
28 determine whether or not the matter should proceed."

29 A. Yes, that's right.

30
31 Q. Early October 2010. If we go then to the third
32 paragraph on the next page, if I could take you to the
33 third sentence:

34
35 *Detective Sergeant Little 's mandate was to*
36 *review the current holdings --*

37
38 I'll skip the words in parentheses --

39
40 *... determine and prepare an investigation*
41 *plan and submit that plan for approval, and*
42 *initiate contact with the victim.*

43
44 A. Yes.

45
46 Q. Could we draw from that that what Lantle was to
47 commence work on in October 2010 had not really been

1 achieved at the time Detective Sergeant Little was
2 appointed to Lantle?
3 A. I know what you're asking, but I can't agree with the
4 way you've put it. There was some activity, I'm aware of
5 some activity. There was the issue with trying to
6 interview [AL] --
7
8 Q. I understand.
9 A. -- the letter that she sent to Detective Chief
10 Inspector Tayler, and that's what the reference -
11 I contacted her by phone and initiated the contact or
12 introduced the contact for Little to re-contact. So, no,
13 there had been things happening but --
14
15 Q. But, substantively, the review of the current
16 holdings - working out what was going to be done with
17 Lantle - that was set up on 12 October had not really been
18 completed. As you say, aspects had been done?
19 A. No, I think --
20
21 Q. I suppose what I'm saying is that Detective Sergeant
22 Little, in effect, was starting afresh?
23 A. No, I don't think he was starting afresh. There had
24 obviously been activity; there had been meetings; there
25 had been attempts to interview the witness. A fresh start,
26 not --
27
28 Q. Could we say at that stage when Detective Sergeant
29 Little was appointed, there was not actually a completed
30 statement taken from any witness?
31 A. I don't know. You'd have to ask Detective
32 Sergeant Little - oh, well, there were statements that were
33 in possession.
34
35 Q. There were statements which had come from Ms McCarthy?
36 A. Yes, or DCI Fox, I'm not sure what the source was.
37
38 Q. When I say "statements from Ms McCarthy", I'm talking
39 about the original statements taken from [AK] and [AL] by
40 Catholic church officials?
41 A. Yes - no, the only ones that I saw were police
42 statements.
43
44 Q. Would you accept from me that in amongst the documents
45 that Ms McCarthy provided back in April of 2010 were
46 statements taken by church officials?
47 A. Yes, I'll accept that.

1
2 Q. So you're not aware if any statements had actually
3 been completed?
4 A. No, I'm not. I haven't got knowledge.
5
6 Q. I think you may have been present yesterday when
7 Constable Freney gave his evidence --
8 A. No, I wasn't.
9
10 Q. Would you accept from me that the warrant or the
11 documents held by the Maitland-Newcastle diocese was
12 executed in May 2011?
13 A. I would accept that. I wouldn't know.
14
15 Q. I suppose the point of my question, what I'm working
16 up towards, DCI Humphrey, is: when you made the
17 observation that the holdings were, frankly, abysmally
18 managed, one issue on your mind, in the context of
19 Ms McCarthy's article as to what Strike Force Lantle had
20 achieved at that time, was that not much had been achieved
21 to that time?
22 A. No. It related strictly to the manila folder that
23 I found in the office, in my new office, and I just didn't
24 like the way it was organised. It didn't give me any sense
25 of what had or hadn't been done. I had to go to e@gle.i to
26 do that. I suppose, in retrospect, e@gle.i is the proper
27 place to do it, but, as I said earlier, I'm a little bit
28 prehistoric, I like my paperwork. I like to see it like
29 that, tabbed and in order and ready to go.
30
31 Q. This was a report going to your superior Assistant
32 Commissioner York?
33 A. Yes.
34
35 Q. I'm sure you would give her frank and fearless advice?
36 A. Not necessarily accepted on all occasions, but, yes.
37
38 Q. I'm sure. Did you take the view that really here we
39 were 12 months into the supply of this material, it was not
40 an important factor to bring to her attention?
41 A. No, I brought to her attention the current status and
42 the fact that Little was on the case and Parker had
43 managerial responsibility. There was certainly - I concede
44 this: there was a momentum shift once Little and Parker
45 took it on.
46
47 Q. We concede that, but I think my comment is that we're

1 12 months in, not a great deal had been achieved; was that
2 something that you felt you should bring to the attention
3 of your assistant commissioner?
4 A. No, there's probably a number of reasons - I can't
5 comment on that - because in that 12 months, apart from the
6 fact it's an historical matter, so it's going to be
7 impacted by what other things are happening, set aside
8 Steel's fresh play, but it is like any complex
9 investigation or intricate investigation. There may only
10 be little steps in 12 months, there might only be two or
11 three statements. It doesn't necessarily predicate that
12 nothing's happening. Having said that, once Detective
13 Sergeant Little was on the case, he was on the case.
14
15 Q. I concede that, yes. One question just in that
16 context: It would have been preferable, would it not, for
17 the warrant to have been executed earlier?
18 A. I can't say when. From an investigative strategy or
19 an investigative point of view, I don't know when it would
20 have been best to execute the warrant. I don't know --
21
22 Q. But as a broad principle, it would be better to secure
23 documents of that type, internal documents of the diocese,
24 as soon as possible?
25 A. After there had been numerous article on the front
26 page of the paper?
27
28 Q. No, that's not my question.
29 A. Well, it's an indicator, isn't it? Is there a rush
30 after it's already been outed?
31
32 Q. Well, that's not the question.
33 A. You can see what I'm getting at.
34
35 Q. Yes, but my observation is, as a general principle - I
36 am just talking about as a general principle. We don't
37 have to talk about the specifics of this matter.
38 A. I'll agree in the general principle.
39
40 MR IRVING: Thank you, Commissioner.
41
42 THE COMMISSIONER: Thank you, Mr Irving. Mr Gyles, do you
43 have any questions?
44
45 MR GYLES: I have no questions, thank you, Commissioner.
46
47 THE COMMISSIONER: Thank you. Mr Saidi,

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<EXAMINATION BY MR SAIDI:

MR SAIDI: Q. Mr Cohen put - indeed he put it as a positive assertion - that there was no basis for there being a genuine concern in relation to Ms McCarthy and Detective Chief Inspector Fox up to 30 September 2010. Do you remember that being put to you?

A. Yes, I do.

Q. From my recollection, it was put in the context of what you were suggesting were leakages that were taking place or rather suspicions of leakages?

A. Yes.

Q. I want you to assume this. I want you to assume that on the following dates articles appeared in the Newcastle Herald up to the period of 30 September 2010: 28 April, 2010; 29 April 2010; 30 April 2010; 1 May, 8 May, 19 May, 16 September, 17 September? All right?

A. Yes.

Q. Have you got those dates in mind?

A. Not all of - but, yes, there's a lot of dates. It accords with my memory. There seemed to be a lot of press about it.

Q. When you say there seemed to be a lot of press, on the assumption that the dates I've given you are correct, did that have any bearings on your suspicion at that time as to what was going on between DCI Fox and a member of the media?

A. Absolutely.

Q. Can you articulate for the Commission the concerns one would have about an investigation or the subject matter of an investigation appearing, whether it be on the front page, on the second or third page or anywhere in a newspaper available to members of the public?

A. There are a number of reasons. Depending on the nature of the article, it could destroy investigative momentum. It could warn possible offenders of our strategies. It adversely affects the victims by seeing their business on the front page of the paper. It is just that that was not a strategy - media in that particular investigation, that at that time was not a strategy. It should not have been played out in the paper.

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Q. I want to be very careful how I ask you about this. You're aware that investigations, particularly major investigations, such as strike forces have investigation plans?

A. Yes, I do.

MR HUNT: I object to where my friend is going. I think he's going to material that's not proper to examine in public.

MR SAIDI: I'm going to approach it the best I can, but it's been suggested to this witness that, in effect, it was deliberately overlooked or that he contrived or, indeed, that he fabricated his evidence in terms of suggestions that DCI Fox should be interviewed. I'm going to suggest that the interviewing of DCI Fox, and indeed Troy Grant, was a decision made at a very early point of time during the course of the investigation. I want to rebut - let me see if I can do it very carefully.

THE COMMISSIONER: Thank you, Mr Saidi.

MR SAIDI: I'll do it in this way.

Q. Are you aware that, for his part, the officer in charge of Strike Force Lantle had determined that an interview of DCI Fox - whether one calls it an interview, a debriefing of DCI Fox - occurred as at early 2011; that is, when he determined when it should be done.

MR COHEN: I object. This is no evidence of that. It is being asserted from the Bar table. To put it to this witness that whether he agrees or disagrees about the existence of the fact has the principal difficulty that I can't, for the life of me, remember where in the evidence that fact is found. That's my difficulty.

MR HUNT: I object to the question as well. My friend knows why I object.

MR SAIDI: I appreciate why they object, but I have had advocates putting it to this witness in positive terms, I will use the term, that he was contriving or fabricating his evidence. I'm trying to do it as neutrally as I can. If it is going to continue to be asserted this witness, as a matter of fairness, should be entitled to

1 respond to it.

2

3 MR COHEN: There is a compensating difficulty for my
4 client, that the gentle-person's agreement I keep referring
5 to has constrained what we're forensically able to do. It
6 cannot be the case that my learned friend can approbate and
7 reprobate at the same time on this proposition. If, as his
8 client has done, he has stepped into the agreement, he has
9 to remain bound by it. I'm simply asking where in the
10 evidence is the foundation for it. There appears to be
11 none. It is that simple and that is prejudicial to my
12 client.

13

14 THE COMMISSIONER: Mr Hunt?

15

16 MR HUNT: Madam Commissioner, if Mr Saidi is referring to
17 my examination of this witness on the issue of the meeting
18 of 16 May, what he puts is not what I put to the witness.
19 I put another available explanation for some material and
20 nothing more than that. I explored properly, as counsel
21 assisting should, the aspects of the witness's evidence and
22 no more than that.

23

24 There is a fundamental difficulty with what Mr Saidi
25 is wanting to put that relates to the difficulty that this
26 Commission labours under in dealing with the matter,
27 notwithstanding that there is a live extant criminal
28 prosecution and there is a whole lot of material that's not
29 before this Commission for very good reason. It is not a
30 prosecution, but police investigation - I overstepped that
31 - but with the possibility of a future prosecution or
32 prosecutions.

33

34 THE COMMISSIONER: Yes.

35

36 MR HUNT: For that reason there is a whole lot of material
37 that's quarantined. I accept there might be a basis for
38 Mr Saidi to go there if that material was before this
39 Commission, but it is not, so it is simply not available.

40

41 I'm prepared to concede on the record that there might
42 be other records that might have been available, and
43 I think that should end the line. Otherwise, one of the
44 difficulties is, and I'm sure Mr Saidi wouldn't want this
45 in the interests of his other client - that is, the NSW
46 Police Force - that this Commission miscarry in relation to
47 a very important part of its functions.

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THE COMMISSIONER: Yes.

MR SAIDI: I appreciate what Mr Hunt says. I am reminded that two police officers gave evidence orally in this court that it was part of the investigation's plan. It has already been given that DCI Fox was to be interviewed. That was, without using their ranks, Mr Little and Mr Jacob. They've already used it. In saying that, perhaps I've argued against myself and you may say "Well, it's already there", but at least a witness should be given an opportunity. My having said that, that evidence has already been given and I don't need to go, based on that, to any confidential material, if I'm correct in the assertion that evidence is there.

There's one other point and I want to come to it and that's the suggestion about Troy Grant. If one goes to volume A of the statements at page 168, there was the plan drawn up by Paul Jacob.

MR HUNT: Can I just say this is all very helpful material that Mr Saidi will be able to put in due course in written submissions in response to anything that the Commission chooses to publish for parties to respond to.

THE COMMISSIONER: Yes.

MR HUNT: It is really not the time for legal submissions.

THE COMMISSIONER: Yes, if the material is there.

MR HUNT: I think Mr Saidi has answered the issue. Because it is an important and critical issue, if he withdraws the line on the basis that he can rely on some other material that's already in, I think that simply answers it.

THE COMMISSIONER: Yes.

MR SAIDI: I'll be sensitive to what has been said.

THE COMMISSIONER: Save for this Mr Hunt - perhaps Mr Saidi wishes the witness to make some further explanation about the perceived coincidence of events that you put to him yesterday.

1 MR HUNT: I've got no problem with a question that directs
2 it to that perceived coincidence and asks him to answer it.
3 There is a body of material that is well understood is
4 confidential and not before the Commission and not going to
5 be before the Commission in evidence, and it is just a
6 delicate matter. It is something that's really quite
7 important to this Commission's whole integrity.

8

9 THE COMMISSIONER: Yes. Mr Saidi, without the need for
10 referring to other people's determinations where they may
11 appear in the documentation, are you able to put a general
12 question designed to elicit some more oral evidence from
13 this witness about the perceived coincidences and the notes
14 that he took of the meeting?

15

16 MR SAIDI: Let me ask a very general question. I'm not
17 insensitive to what Mr Hunt says. Let me ask a very
18 general question along these lines.

19

20 Q. In terms of the interviewing of or any potential
21 interview or debriefing of Detective Chief Inspector Fox,
22 did you have any or do you have any personal knowledge as
23 to when Mr Little, for his part, first determined to
24 debrief him or to interview him?

25

26 A. No, I don't have personal knowledge - only the
27 investigation plan.

28

29 Q. In terms of Troy Grant, if I come to him for the
30 moment - this is at page 168 of the statements; this
31 shouldn't cause a problem - were you aware that Paul Jacob,
32 in his suggestions made to Mr Little, indicated, after
33 having reviewed the investigation plan in or about May of
34 2011, that Troy Grant was a person who should be spoken to?

35

36 A. Yes, I was aware of that.

37

38 Q. When you were aware of that, was that around about May
39 or thereabouts in 2011?

40

41 A. I don't have an exact memory, but, yes.

42

43 Q. I want to take you to some evidence given during the
44 course of this inquiry. Do you have the statement of
45 Mr Watters there? I'll direct you to it specifically. It
46 is tab 11 of volume B.

47

48 A. Volume 2?

49

50 Q. Would you be kind enough to go to that statement.

1 MR HUNT: That statement isn't in evidence. I'm just
2 wondering, this is an unusual approach to take in
3 cross-examination, to take a witness to the statements of
4 other witnesses.

5
6 MR SAIDI: I want to take him to an annexure. That's why
7 I asked him if he's got the statement. I didn't want to
8 take him to the statement per se, but to the annexure. It
9 is an annexure Detective Chief Inspector Fox has given
10 evidence about.

11
12 THE WITNESS; Can I ask what volume it was again?

13
14 THE COMMISSIONER: Was it annexure 11, tab 11, did you
15 say, Mr Saidi?

16
17 MR SAIDI: It is page 491.

18
19 THE COMMISSIONER: Tab 111 do you mean?

20
21 MR COHEN: If I could assist, it is tab 11 in statement
22 volume B, tab 81.

23
24 MR SAIDI: Q. Can I direct your attention to tab 81?
25 A. What I've got at page 491 is the minutes of a
26 complaint management team meeting held at region.

27
28 Q. No, you've got a different document. I'll take you to
29 tab 81 of the documents.

30 A. Tab 81 in my book is a status report under the hand of
31 Inspector Watters. It's a COPS entry; is that what I'm
32 looking at is.

33
34 Q. Could you be kind enough to go to page 355.
35 A. Yes.

36
37 Q. Do you see a reference there to a case history,
38 administrative action?

39 A. Yes.

40
41 Q. Do you see a series of dates which are given there?
42 A. Yes.

43
44 Q. If you go to the dates but specifically of 2007,
45 27 December 2007 - do you see that?

46 A. Yes, I've got that.
47

1 Q. Do you also see November 2010, the transfer out of the
2 case?
3 A. Yes.
4
5 Q. If one accepts this document at face value, what it
6 appears to indicate is Detective Chief Inspector Peter Fox
7 in 2010, and specifically, on 23 November 2010, made an
8 entry.
9 A. What date again, I'm sorry?
10
11 Q. 23 November 2010.
12 A. Yes.
13
14 Q. After the case having been finalised on 27 December
15 2007, he came back into it on 23 November 2010 and made a
16 number of entries on that day. Do you see that?
17 A. Yes.
18
19 Q. At that time there was a split of the LAC commands; is
20 that right?
21 A. Around that period, yes.
22
23 Q. Were you familiar with the process that occurred
24 during the course of the split?
25 A. Yes, I was at region then.
26
27 Q. From your knowledge of how the administration worked
28 at that time, was it necessary for one to carry out a
29 process of reopening a case in order to transfer it out to
30 another local area command?
31 A. It would depend on the purpose.
32
33 Q. Can you give an explanation?
34 A. Well, if it's a case that's finalised and there's
35 nothing fresh to be done on it there's, no reason to reopen
36 it. To reopen it, it's --
37
38 Q. Do you see the entries there --
39 A. During that period there was - just remembering
40 Waratah and Newcastle split of cases, just because it was a
41 Waratah and Newcastle case, the merging by BTS of cases
42 occurred normally. You didn't have to do anything. If you
43 needed to reopen a case, you just reopened it if you had
44 the appropriate priority.
45
46 Q. Looking at the entries there of November 2010, with
47 your knowledge of how the administration works, was there

1 any need, from an administrative or bureaucratic viewpoint,
2 from the NSW Police Force for Detective Chief Inspector Fox
3 to have opened the case in order to transfer it?
4

5 MR COHEN: I object. How can this witness possibly know
6 what need DCI Fox may have had? This witness can't give
7 useful evidence to you about the mechanics of the c@ts.i
8 system or the COPS system. The document speaks for itself.
9

10 THE COMMISSIONER: We have had evidence from
11 Detective Chief Inspector Fox about what happened.
12

13 MR COHEN: Yes. This doesn't arise in any way. I object.
14

15 MR SAIDI: Can I refer my friend to page 366 of the
16 transcript where Detective Chief Inspector Fox gave an
17 explanation as to a need on his part to transfer the matter
18 across. It was put quite clearly, one would have thought,
19 by Mr Roser that he had no need to reopen the case on that
20 day, it being a finalised case.
21

22 MR COHEN: I accept all of that, but this witness can't
23 assist you with that, Commissioner, because this witness
24 can't possibly tell you the mechanics of the system on that
25 footing, having regard to what Fox did. What one needs is
26 expert evidence that relates to its limitations, its
27 extent, its mechanics and its procedures and then you will
28 be appropriately apprised.
29

30 THE COMMISSIONER: Mr Cohen, the witness may know the
31 intricacies of the system. I will allow the question.
32

33 THE WITNESS: Generally, if you reopen a case, or if you
34 transfer a case and reopen it, or accept it and reopen it,
35 it is to add something to it or it's just - why do you do
36 that? It is like adding a name to a charge sheet after it
37 has been completed. It just doesn't make sense.
38

39 MR SAIDI: Q. And in terms of your knowledge of the
40 spirit of the commands --

41 A. He may well have had a reason. I don't know, but it
42 just doesn't make sense to do that, especially then because
43 there was nothing going on with that case.
44

45 Q. This is what I want to ask you about. From a policing
46 point of view, can you see a reason for that having been
47 done in circumstances where the case has been closed and

1 the alleged perpetrator is deceased?

2 A. It is just highly unusual. No, I can see no reason,
3 on what I have in front of me, no.

4

5 Q. I just want to ask you a series of further questions
6 if I can.

7

8 THE COMMISSIONER: Should we take an adjournment Mr Saidi?

9

10 MR SAIDI: Thank you, Commissioner.

11

12 **SHORT ADJOURNMENT**

13

14 MR HUNT: Mr Saidi was cross-examining Detective Chief
15 Inspector Humphrey.

16

17 MR SAIDI: Q. Detective Chief Inspector Humphrey, I want
18 to bring you to the topic of the meeting of 2 December 2010
19 which was held?

20

A. Yes.

21

22 Q. You're aware such a meeting was held?

23

A. Yes, I was.

24

25 Q. Did you have any part in the calling of such meeting
26 together?

27

A. No, I did not.

28

29 Q. Or any input in terms of what was to occur at the
30 meeting?

31

A. No.

32

33 Q. Did you have any discussions with now Assistant
34 Commissioner Mitchell about a meeting being called?

35

A. No, I don't recall I did.

36

37 Q. And in terms of the directions which were given during
38 the course of the meeting, when did you first become aware
39 of the fact that such directions were given?

40

A. After the meeting. I had no input into Mr Mitchell's
41 decision-making process.

42

43 Q. When after the meeting, can you tell us?

44

A. No - oh, days. I was off for a period over that
45 meeting, it's - so I can't tell you exactly.

46

47 MR SAIDI: That's the examination.

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THE COMMISSIONER: Thank you, Mr Saidi. Mr Hunt is there anything arising?

MR HUNT: There is no re-examination, Commissioner.

THE COMMISSIONER: Thank you Mr Hunt.

Detective Chief Inspector Humphrey, thank you for your evidence. You are excused.

THE WITNESS: Thank you, Commissioner.

<THE WITNESS WITHDREW

MS LONERGAN: I call Detective Chief Inspector Parker.

MR ROSER: I rely upon section 23(3).

THE COMMISSIONER: Thank you, Mr Roser. That is noted.

<GRAEME JOHN PARKER sworn: [12.40pm]

<EXAMINATION BY MS LONERGAN:

MS LONERGAN: Q. Your full name is Graeme John Parker?

A. That's correct.

Q. And you're a detective inspector?

A. Yes, I am.

Q. I'm sorry, I think gave you the wrong rank as you approached the witness box. Can I refer to you as

detective or inspector; is that the most appropriate?

A. Either is fine.

Q. You prepared a statement with the assistance of your lawyers in March this year?

A. That's correct.

Q. I'm going to show you a copy of that statement.

I note for you and for the record, that the copy that's coming up to you now, and a copy for the Commissioner, has been redacted to remove certain matters of sensitivity regarding current police investigations. I'll ask you to have a look at your statement. Focusing on the text of the statement, detective inspector, is the contents of that

1 statement true and correct?

2 A. Yes, it is.

3

4 Q. Is there anything that you wish to change in that
5 statement?

6 A. No, nothing at all.

7

8 MS LONERGAN: I tender that statement.

9

10 THE COMMISSIONER: The statement of Detective Inspector
11 Parker will be admitted and marked exhibit 40.

12

13 **EXHIBIT #40 STATEMENT OF DETECTIVE INSPECTOR PARKER DATED**
14 **7/3/2013**

15

16 MS LONERGAN: Q. You were attested a police officer
17 in December 1987?

18 A. Yes, that's correct.

19

20 Q. And then you carried out some general duties and, in
21 1992, you began working in special operations?

22 A. That's correct.

23

24 Q. Special operations, has that any particular relevance
25 to an investigation of sexual abuse or criminal
26 investigations of a complex nature?

27 A. It touches on criminal investigations of a complex
28 nature, but certainly not sexual assaults, so it would more
29 strictly be a criminal investigation or CI-type role.

30

31 Q. In 1994 you transferred to plainclothes at Raymond
32 Terrace and for some years did various investigating duties
33 including investigation of child sexual abuse matters?

34 A. Yes, that's correct.

35

36 Q. Did you also have a period as a prosecutor?

37 A. No.

38

39 Q. No, just preparing briefs for prosecution?

40 A. Yes.

41

42 Q. Thank you. In 1996, you were promoted to detective?

43 A. Yes, that's correct.

44

45 Q. In 1998, you worked on various investigations
46 involving outlaw motorcycle gangs in particular?

47 A. Yes, that's correct.

1
2 Q. Before that, you were on secondment and then, in 2000,
3 returned to the Lower Hunter detectives where you continued
4 to work up until the year 2000?
5 A. Yes, that's correct.
6
7 Q. You were promoted to the position of crime manager for
8 Lower Hunter Local Area Command to work on a particular
9 operation regarding drug distribution?
10 A. I wasn't promoted to crime manager. I was put in that
11 role by the crime manager.
12
13 Q. So you had a period where you worked as crime manager
14 in the Lower Hunter Local Area Command?
15 A. No.
16
17 Q. No.
18 A. I was selected by the crime manager to --
19
20 Q. I see, I'm terribly sorry. You performed further
21 investigative duties and it wasn't until later that you
22 worked as a crime manager?
23 A. Yes, that's correct.
24
25 Q. In 2002, you were promoted to the rank of detective
26 sergeant and did some work at Singleton police station with
27 your primary duties being general criminal investigations?
28 A. Yes, that's correct.
29
30 Q. In 2006, you were promoted to inspector?
31 A. Yes.
32
33 Q. And in 2008, you were transferred to the crime
34 manager's position at Brisbane Waters Local Area Command?
35 A. Yes.
36
37 Q. Can you outline for the benefit of those present your
38 perception of the crime manager's role in the local area
39 command - just in short terms; it doesn't need to be a very
40 detailed description.
41 A. Basically, the crime manager's role is basically
42 charged with the proactive addressing of crime within the
43 LAC and also basically the criminal investigation of any
44 serious crime that's occurred.
45
46 Q. Is it part of a crime manager's role to carry out the
47 day-to-day carriage of investigative duties in relation to

1 crimes relevant to the local area command?

2 A. No, it is more a management role.

3

4 Q. Managing other officers carrying out those
5 investigative duties?

6 A. Absolutely.

7

8 Q. Just in terms of the general management of these sorts
9 of investigations of the sort that Lantle ended up being,
10 is that the type of investigation that's better managed by
11 one local area command or can it be run across a number of
12 local area commands?

13 A. Under the terms that Lantle was run, it could be
14 managed, by - well, I believe we did manage it at a local
15 area level.

16

17 Q. The benefits or otherwise of running it at one local
18 area command level, as you are able to attest, are what?

19 A. There are advantages and disadvantages in basically
20 managing in any way, shape or form. But the advantages
21 are, obviously, that you're able to keep a much tighter
22 control of things at a local level. It doesn't involve or
23 impact on the rest of the Police Service because it really
24 only impacts on the local area command that it is assigned
25 to. There are a couple of benefits of it. There's,
26 obviously, advantages in doing it the other way as well.

27

28 Q. And "doing it the other way", you mean spread across a
29 number of local area commands?

30 A. Absolutely.

31

32 Q. An investigation of the nature of Lantle, is that
33 something that would be a good idea having a number of
34 officers over a number of local area commands working on;
35 and if not, why not?

36 A. Look, again, there are pros and cons to both sides of
37 that. However, it was a moot point to me; when I took it
38 over the assistant commissioner had already decided it was
39 going to be managed at a local level and that's what it
40 was.

41

42 Q. I'm going to ask you some questions about a meeting
43 that occurred on 2 December 2010.

44 A. Yes.

45

46 Q. You deal with that in paragraph 12 to paragraph 20 of
47 your statement. First of all, your role, as at the date of

1 this meeting on 2 December 2010, was that you were acting
2 as operations manager; is that correct?

3 A. That's correct.
4

5 Q. And the operations manager's duties are what, just in
6 general compass?

7 A. It is a rather large role, but basically, in the
8 format that it relates to this particular matter, it was to
9 stay abreast of that particular issue and to keep the
10 region commander briefed on what was occurring in relation
11 to it and also to feed back any information or desire that
12 the assistant commissioner required of the investigation.
13

14 Q. Stepping forward a little in time, but just to clarify
15 your role in relation to the Lantle investigation that I've
16 asked you some questions about, in March 2011, you were
17 appointed the crime manager to the Newcastle Local Area
18 Command?

19 A. Yes, that's correct.
20

21 Q. At that point you became involved in the Lantle
22 investigation in a supervisory capacity?

23 A. Yes, that's 100 per cent correct.
24

25 Q. We'll step back to the meeting on 2 December 2010. At
26 that point you weren't part of the Lantle investigation
27 team in any way?

28 A. No, not at all.
29

30 Q. You were present at the meeting on 2 December only as
31 acting operations manager in a supervisory type of capacity
32 or overseeing capacity. Is that a fair summary, or how
33 would you describe your need or presence at that meeting?

34 A. My presence, I took a briefing prior to that meeting
35 from the full-time operations manager who had been taken
36 off-line and from the assistant commissioner as to --
37

38 Q. Can we clarify who those people are?

39 A. Yes, Inspector Townsend and Assistant Commissioner
40 York.
41

42 Q. Are you able to say when that briefing occurred in
43 relation to the meeting on 2 December?

44 A. My recollection is that it was over a number of days.
45 I read a number of documents that related to it. I was
46 given them to read at my leisure.
47

1 Q. You were given them by Ma'am York or by Mr Townsend?
2 A. No, by Inspector Townsend.
3
4 Q. Are you able to assist us as to whether it was a file
5 of documents or whether you were given things to read on
6 TRIM or how did it work?
7 A. Yes. One was a document that related to a basic
8 appraisal or - actually start the other way. One was a
9 document submitted by Mr Fox that related to - it was a
10 report relating to his desires to initiate, for want of a
11 better term, a task force or a major investigation into the
12 Catholic Church.
13
14 Q. Can I ask you to have a look at the annexures to your
15 statement. I want to cross-reference the evidence you've
16 given with documents annexed to your statement. Do you see
17 at the bottom middle of your statement, there is a page
18 number? Do you see it down the bottom there?
19 A. Yes.
20
21 Q. Page 371 is a document prepared by Detective Chief
22 Inspector Fox. Could you confirm whether that is the
23 document that you've just given evidence about?
24 A. Yes, it is.
25
26 Q. You're absolutely confident that's the position?
27 A. Yes, it is.
28
29 Q. Were you given a photocopy of this particular document
30 we're looking at now or did you read it in the original
31 within the material you were provided, or how did it come
32 about?
33 A. I would be grasping at straws there. I believe it was
34 the original, but I wouldn't like to give evidence to that
35 fact.
36
37 Q. Perhaps I can approach it this way. Did you need to
38 return what you looked at back to the officers who gave it
39 to you?
40 A. Yes. Yes, I did.
41
42 Q. Was that because, at that time, you didn't have an
43 active role in that investigation but you were being
44 briefed to understand what was happening?
45 A. Inspector Townsend just asked could he have the
46 documents back when I was finished with them.
47

1 Q. What was your role at the meeting on 2 December 2010,
2 as you understood it, prior to the meeting commencing?
3 A. My role was fairly simple. The assistant commissioner
4 wanted Newcastle Local Area Command to take carriage of the
5 matter. There was no ifs or buts about that.
6
7 Q. Who told you that?
8 A. The assistant commissioner.
9
10 Q. Who was that?
11 A. Ma'am York.
12
13 Q. She told you that that was your role in the meeting,
14 to ensure that that line was held?
15 A. Yes. Newcastle had, I believe, a different position
16 to that, but ma'am had made the decision and my position
17 there was to ensure that that occurred.
18
19 Q. Did you discuss the wisdom or otherwise of the
20 decision-making process?
21 A. No.
22
23 Q. It is not your role to debate that with Ma'am York?
24 A. I've debated things with Ma'am York, but not that one.
25
26 Q. Can I ask you if you debated that matter with
27 Ma'am York's who opinion would prevail?
28 A. Oh, Ma'am York's.
29
30 Q. We get one in for the team there.
31 A. Yes.
32
33 Q. Annexed to your statement is an investigator's note,
34 annexure A, which was supposed to have been prepared by an
35 officer, Justin Quinn, Detective Senior Sergeant Quinn. Do
36 you see that as annexure A?
37 A. Could you tell me the page number again, please,
38 madam?
39
40 Q. Yes, the page number is easier. It's page 318 and
41 following.
42 A. I have it, thank you.
43
44 Q. In your statement in paragraph 12, you note that
45 that's a copy of the minutes of the meeting?
46 A. Yes.
47

1 Q. I want to draw a couple of matters to your attention
2 in that investigator's note. You will see on page 319,
3 there's an entry in the second last paragraph noting your
4 arrival at the meeting?
5 A. Yes.
6
7 Q. Do you see that?
8 A. Yes.
9
10 Q. You would agree with me, would you not, that you
11 missed some proportion of the meeting?
12 A. Yes, I did. I was instructed not to, but I did.
13
14 Q. Are you able to now state how much in terms of time
15 you missed of the meeting that started at 12.25, as noted
16 by that particular officer?
17 A. I don't think I was particularly late. I had
18 something else I had to attend to, and I explained that
19 later on to Ma'am York, but I wasn't particularly late.
20 I don't think I missed a great deal.
21
22 Q. Is it fair to say you're unable to say whether the
23 first part of those notes - that is, what occurred to you
24 prior to you attending - is an accurate reflection of what
25 occurred in the meeting because you weren't there?
26 A. No, I wasn't --
27
28 Q. I am sorry; I asked that badly. You weren't there for
29 the first part of the meeting, so you can't say whether
30 those notes are right or not, can you?
31 A. No, I can't.
32
33 Q. Whilst you were present in the meeting, did you notice
34 any animosity or raised voices on the part of
35 Superintendent Mitchell?
36 A. No.
37
38 Q. Raised voice, I should say. Whilst you were there,
39 are you able to estimate how long Detective Chief Inspector
40 Fox was also present for that part of the meeting you were
41 present?
42 A. He was certainly there while I was present. He did
43 leave during the meeting, but I couldn't accurately give a
44 time frame on how long it was. I know that the file note
45 indicates that a certain thing was said at a certain point
46 and my recollection is that I was there when that was said
47 as well. What I would suggest may have happened it may

1 have been said more than once. In fact, I think that was
2 probably the case.

3

4 Q. All right. From the evidence you've just given, may
5 we take it that you're referring to annexure B, which is
6 your handwritten notes --

7 A. Yes.

8

9 Q. -- of what occurred at the meeting?

10 A. Yes, that's correct.

11

12 Q. Just turn to annexure B which is page 323, please. In
13 that note, you say:

14

15 *Meeting with Mitchell, Taylor, Quinn,*
16 *Steel, Haggett and Fox.*

17

18 Is that right?

19 A. That's correct.

20

21 Q. Then:

22

23 *Re Catholic Church investigation.*
24 *Mitchell issues direction that all*
25 *officers involved in investigation and*
26 *management --*

27

28 And I can't read the next bit.

29 A. :

30

31 *involved in investigation and management*
32 *issue --*

33

34 Q. Yes. Can you keep reading?

35 A. Yes:

36

37 *are not to speak with press on issue*
38 *without authorisation of himself.*
39 *Further enforced when I explained region's*
40 *position of this issue. It was clear that*
41 *NMH.*

42

43 Q. That's "Newcastle Herald"?

44 A. Yes, "Newcastle Herald".

45

46 Q. "Has pipeline to"?

47 A. "Has pipeline to investigation which needs to be

1 stopped as it ..."
2
3 Q. "Effectively"?
4 A. "Effectively" --
5
6 Q. "Hamstrings the progress"?
7 A. My copy is really poor.
8
9 Q. "Hampering the process"?
10 A. "Hampering the process of same. Everyone states they
11 understand" - and I've got a puncture hole there -
12 "discuss", I think it is, "Newcastle will have carriage of
13 matter." And that's where --
14
15 Q. I think that's, "Fox to pass on all knowledge and
16 statements"?
17 A. "Fox to pass on all knowledge and statements,
18 et cetera, to Steel in handover."
19
20 Q. All right. The note that you made, this is in your
21 duty book, is it, or your diary?
22 A. My diary.
23
24 Q. Did you make it the day your meeting occurred?
25 A. Yes.
26
27 Q. Have you only recorded in there things that you
28 observed in the meeting, or does it include things that you
29 were told occurred prior to your attendance?
30 A. No, I've only recorded things I observed.
31
32 Q. Do you recall any statements by Detective Chief
33 Inspector Fox, while you were present, to the effect that
34 indicated he was unhappy about not being involved in the
35 investigation?
36 A. I was aware that he wanted to be involved in the
37 investigation.
38
39 Q. Were you aware of that from statements he made in that
40 meeting or are you aware from another source?
41 A. Oh, both, but he certainly wasn't antagonistic or
42 anything.
43
44 Q. You became aware of him wanting to be involved in the
45 investigation prior to the 2 December 2010 meeting?
46 A. It was pretty clear from his report that he wanted to
47 be involved in the investigation.

1
2 Q. Any other sources of information that led you to that
3 view?
4 A. Not that I recall --
5
6 Q. And --
7 A. -- other than, obviously, the conversation he was
8 having in the thing, in the meeting. He --
9
10 Q. All right. And that conversation occurred in the
11 meeting in your presence?
12 A. I believe so, yes.
13
14 Q. You note in paragraph 15 of your statement that there
15 was a concern to region that there appeared to be someone
16 within the NSW Police Force leaking information to the
17 Newcastle Herald. You mention that in paragraph 15.
18 A. Yes, region were convinced of that.
19
20 Q. And that it was important to reinforce at that meeting
21 that there should not be any unauthorised media statements?
22 A. Absolutely. Ma'am's direction was that the leak will
23 stop.
24
25 Q. Are you sure you were present when that statement was
26 made? I don't mean by you, but when that statement was
27 made by anyone other than you?
28 A. Sorry, you just lost me there.
29
30 Q. Sorry, I've lost myself. Were you present in the
31 meeting when a person other than yourself made a statement
32 to that effect; that is, that any unauthorised media
33 statements were not to be made and were to cease
34 immediately?
35 A. I believe I was present when Max Mitchell said that,
36 yes.
37
38 Q. Max Mitchell said that?
39 A. Yes.
40
41 Q. Did you interpret what he said to be a direction to
42 all those present?
43 A. I know I've said "direction" there. I guess, yes, it
44 is a direction.
45
46 Q. When you said, "I said direction there", you mean in
47 your memo of 2 December, sorry, the handwritten note in

1 your diary --
2 A. Yes.
3
4 Q. -- you actually used the word "direction"?
5 A. Yes.
6
7 Q. There was no doubt, is there, that was a direction
8 that was being issued?
9 A. No, it was either a direction or a command. It wasn't
10 a request.
11
12 Q. I understand. I want to ask you some questions about
13 your role between 2 December and March 2011. Can we take
14 it you had no role in relation to Strike Force Lantle after
15 you finished your acting operations manager role
16 in December 2010?
17 A. To my recollection, I don't think I did another thing
18 in relation to Strike Force Lantle after I walked out of
19 the meeting on the 2nd.
20
21 Q. You resumed a role over Lantle, as you refer to in
22 paragraph 21 of your statement, in March 2011?
23 A. Yes, by virtue of the fact that I transferred into the
24 position of crime manager, yes, for Newcastle.
25
26 Q. So you weren't officer in charge or officer
27 supervising the officer in charge or anything of that
28 nature --
29 A. No.
30
31 Q. -- in terms of direct involvement in active
32 investigative steps?
33 A. No, I had the managerial carriage of it.
34
35 Q. Is that because the role of crime manager means you
36 don't delve into that amount of detail with active
37 investigatory steps but you supervise. Is that a fair
38 statement of the position?
39 A. Yes, that's how I do. Wayne Humphrey - Chief
40 Inspector Humphrey, sorry, was very correct in saying that
41 we all do it slightly differently. That's how I do it.
42
43 Q. All right. In paragraph 28, you make an observation
44 amongst other observations regarding Detective Chief
45 Inspector Fox's potential involvement in Strike Force
46 Lantle. You say that if Detective Chief Inspector Fox had
47 been given any role in Strike Force Lantle, it wouldn't

1 have been an active primary role as an investigator because
2 it should have been something that more befits his rank and
3 position with the NSW Police Force. Can you just outline
4 for those present in court what you mean there?

5 A. Yes, certainly. It is unheard of, basically, for a
6 crime manager to actually get down on the tools and work at
7 that level. I'm not saying that it can't occur, it
8 certainly can, if that's what's deemed appropriate; but,
9 for all intents and purposes, the crime manager would need
10 to be taken off-line, I mean, and actually put into that
11 role by someone in authority above them. So, say, the
12 assistant commissioner would need to take - or, I guess,
13 the super would need to take that crime manager off-line
14 and put them in charge of something different to what
15 Strike Force Lantle was.

16
17 Q. Did anyone tell you that there was to be no contact
18 with Detective Chief Inspector Fox about Strike Force
19 Lantle? I'm not suggesting that there was, but was there?

20 A. I don't believe anyone told me that. I mean, this
21 part of Strike Force Lantle, it was always our intention to
22 speak to Mr Fox.

23
24 Q. Are you able to recollect occasions on which you
25 spoke to Detective Chief Inspector Fox prior to some
26 conversations that occurred in April 2012 that I will take
27 you to?

28 A. Prior to April?

29
30 Q. Yes, prior to April 2012. Between March 2011 and
31 April 2012, did you personally have discussions with
32 Detective Chief Inspector Fox regarding the subject matter
33 of Lantle or matters relating to Lantle, including --

34 A. Not that I recall.

35
36 Q. -- things he knew independent of what you were doing
37 in Lantle?

38 A. No.

39
40 Q. Is there any reason why not?

41 A. We were pursuing, you know, other information.
42 I believe - I don't know this for a fact, but I believe
43 Mr Fox may have been off work sick in that period as well.
44 We were just busy with other things.

45
46 Q. Did you become aware when you began working as crime
47 manager in March 2011 that information and documents had

1 been obtained from Detective Chief Inspector Fox?

2 A. Yes.

3

4 Q. Did you have any reason to doubt that what had been
5 provided was the complete holdings of Detective Chief
6 Inspector Fox; that is, at the time, March 2011?

7 A. I've never been sure that we've received everything
8 from Mr Fox.

9

10 Q. That's your statement now. In March 2011, did you
11 have any reason based on your knowledge --

12 A. I had no reason, no.

13

14 Q. I should finish the question just so it is clear in
15 the transcript.

16 A. I'm sorry.

17

18 Q. That's all right. Did you have any reason to suspect
19 or worry that Detective Chief Inspector Fox had not been
20 open with the police force and had not provided all the
21 material he had available to him that was relevant as at
22 March 2011?

23 A. I'd have to say I've always had some concerns
24 regarding that.

25

26 Q. If Detective Chief Inspector Fox was considered to
27 have this information or potential knowledge of contacts
28 that may be able to assist the investigation, why wasn't he
29 debriefed earlier than April 2012, to the extent you're
30 able to say given your role from March 2011 to April 2012?

31 A. As I said, we were pursuing other lines of inquiry.

32

33 Q. Yes?

34 A. From my understanding of - Mr Fox's own admission is
35 his information was mainly gained from Ms McCarthy, who I
36 was talking to. There was no need to approach Mr Fox prior
37 to that.

38

39 Q. You've just mentioned Ms McCarthy and talking to
40 Ms McCarthy. The inquiry has heard evidence that police
41 employ strategic contacts with media to get information?

42 A. Yes.

43

44 Q. And without going into the details of any content of
45 information you received from Ms McCarthy, are you able to
46 confirm that during 2011, you did receive from Ms McCarthy
47 information that assisted some lines of inquiry relevant to

1 Strike Force Lantle?
2 A. Yes.
3
4 Q. I just want to ask you a question about an annexure to
5 your affidavit. It is page 361. You will see it appears
6 to be a file note dated 18 October 2010 authored by
7 Detective Chief Inspector Fox?
8 A. Yes.
9
10 Q. Are you able to say when you first saw that memo by
11 Detective Chief Inspector Fox, if at all?
12 A. I was going to say I don't recall ever seeing it, to
13 be honest, but --
14
15 Q. But we will assume you saw it for the purposes of
16 preparing the papers attached to your statement because it
17 is attached to your statement?
18 A. I didn't attach it to my statement.
19
20 Q. Oh, you did not attach it to your statement?
21 A. No.
22
23 Q. Just to explain its origin, can I go about it this
24 way - would you have a look at annexure G to your
25 affidavit. Do you see that's a memo that you prepared
26 for --
27 A. The page?
28
29 Q. Yes, it is page 339. It appears to be a special
30 briefing prepared for Ma'am York?
31 A. Yes.
32
33 Q. Regarding delays associated with the investigations
34 conducted by Strike Force Lantle?
35 A. Yes.
36
37 Q. Including investigation contacts with DCI Fox of Port
38 Stephens command. Do you see that?
39 A. Yes.
40
41 Q. The origin of the preparation of this document was the
42 public discussion of Lantle; is that a fair summary?
43 A. Yes.
44
45 Q. This document briefs Ma'am York as to what's been
46 happening. Is that a fair summary also?
47 A. Yes.

1
2 Q. Annexed to that document is some material that informs
3 what you've said in the summary for Ma'am York and included
4 in that material are various documents that were collected
5 from the Lantle holdings?
6 A. Yes.
7
8 Q. Does that explain the --
9 A. Yes, it does.
10
11 Q. -- existence of that particular memo from Detective
12 Chief Inspector Fox?
13 A. Absolutely.
14
15 Q. Are you able to, now looking at it in that context,
16 confirm you have at some stage read that memo or not?
17 A. At best I probably would have only scan read it. I
18 was requested to - and as is explained in that memo, all I
19 did was do a drop out of e@gle.i in relation to that
20 particular name, Mr Fox's name and that's what dropped
21 through.
22
23 Q. But in relation to the memo of 25 November 2010, which
24 is the more detailed document prepared by DCI Fox, your
25 evidence is that you read that shortly after - I'm sorry,
26 shortly before the briefing on 2 December 2010?
27 A. Yes.
28
29 Q. You're confident about that recollection?
30 A. Yes.
31
32 Q. There are just a couple of things before I finish the
33 examination-in-chief, if I may. In April 2012, do you
34 recall having a telephone conversation with Detective Chief
35 Inspector Fox, early in April 2012?
36 A. Yes.
37
38 Q. He made contact with you, or you with him?
39 A. It was either early March or early April, the initial
40 contact.
41
42 Q. Are you able to assist in what prompted that contact?
43 A. Yes. Mr Fox contacted me in relation to a request
44 that he'd received from Detective Sergeant Faber. He'd
45 requested information in relation to a priest. Do you want
46 me to --
47

1 Q. No, need to. I think [NP] is the pseudonym we're
2 referring to. If you look at annexure C, I appreciate this
3 is an email exchange, not one you were included in, but
4 annexed to your statement at page 324, there's an email
5 from DCI Fox to Superintendent Galton and others?
6 A. Yes.
7
8 Q. Do you see certain issues are raised in that email
9 regarding permission to contact or discuss with Ms Faber
10 certain matters?
11 A. Yes.
12
13 Q. Does that assist in your recollection as to the prompt
14 for the call?
15 A. Yes. [NP] is correct; and, yes, that's what prompted
16 the call.
17
18 Q. Did you discuss with him at that time whether he had
19 any other information he could provide to assist Strike
20 Force Lantle investigations?
21 A. No, I was rather busy at the time and we kept it very
22 businesslike. It was simply a phone call where he said,
23 "I've been asked by Detective Sergeant Faber to supply a
24 photograph of [NP]."
25
26 Q. Yes.
27 A. He also asked me whether he could discuss another -
28 I presume if it is not redacted, I can say it?
29
30 Q. No. Don't say it just to be on the safe side?
31 A. Okay.
32
33 Q. Whether he could discuss other matter?
34 A. No, it related to [NP] and another member of the
35 Catholic Church.
36
37 Q. All right. Don't say the name.
38 A. Okay, fine, because he had been told by Mr Galton
39 that he had to contact me to ask whether it was going to
40 interfere with our investigation.
41
42 Q. Yes.
43 A. It was really this brief, I basically said, "No,
44 that's fine."
45
46 Q. Did you have any discussion during that phone call
47 regarding his report of 25 November 2010.

1 A. I told him I would get back to him, that I'd contact
2 him because I - we needed to speak to him, and it was a
3 fairly timely phone call for him at that point.
4
5 Q. No, that's okay. I'm asking you something very
6 specific, though.
7 A. Sorry.
8
9 Q. Did Detective Chief Inspector Fox raise with you or
10 did you raise with him his 25 November 2010 report?
11 A. I don't believe so.
12
13 Q. At any time in April 2010, did you have a discussion
14 where Detective Chief Inspector Fox said to you "Look, you
15 know, this is all in my report. Haven't you read my
16 report"?
17 A. That was a later phone call.
18
19 Q. In a later phone call?
20 A. Yes.
21
22 Q. Do you remember what was said about that? Did you say
23 to Detective Chief Inspector Fox that you'd never seen that
24 report and you didn't know what he was talking about?
25 A. I did.
26
27 Q. Why did you say that given your evidence today has
28 been that you read it shortly before the briefing in 2010.
29 A. Absolutely. It was a rather long phone call. It
30 happened as a result of, as I said, this call where I said
31 to him I'd get back to him. I got back to him on 2 April.
32
33 Q. How much later was the phone call?
34 A. Oh, it would only have been a couple of days, so it
35 was in that time frame. 2 April was - this particular
36 phone call I'm talking about now, the one you've referred
37 to --
38
39 Q. Yes?
40 A. -- I actually rang him. I'd spoken to Sergeant Little
41 and we'd discussed a number of matters in relation to this
42 before I spoke to him. We were looking to find out what it
43 was he had to - that was one of the last areas that needed
44 to be investigated.
45
46 Q. What was one of the last areas that needed to be
47 investigated?

1 A. His holdings.
2
3 Q. His holdings?
4 A. What he had.
5
6 Q. Why was that one of the last matters that needed to be
7 investigated?
8 A. Well, we'd already done a reasonable amount at that
9 point. We were starting to get towards - it had been going
10 for a while. We were starting to get towards coming to
11 terms with just about all our other sources of information.
12
13 Q. Could I ask you this: given your evidence is that you
14 read Detective Chief Inspector Fox's November 2010 report
15 back in December --
16 A. Yes.
17
18 Q. -- and I appreciate you didn't have an active role in
19 the investigation, and I appreciate you didn't work on it
20 even as crime manager until a few month later, are you able
21 to state whether the matters raised in Detective Chief
22 Inspector Fox's report of November 2010 were considered in
23 terms of the Lantle investigation?
24 A. Absolutely.
25
26 Q. Were they followed through to the extent that they
27 fitted within the terms of reference pursuant to which
28 Lantle was operating?
29 A. Yes.
30
31 Q. The purpose of the discussion with Detective Chief
32 Inspector Fox in April that you're just referring to,
33 2 April, was that specifically designed to find out if
34 there was more you needed to find out and pursue?
35 A. There had been filtering through for some time and
36 Mr Fox had intimated on a number of occasions that there
37 were other things, or he spoke of other things that clearly
38 weren't contained in the documentation that we had.
39
40 MS LONERGAN: Commissioner, is that a convenient time?
41 I've still got about 10 minutes to go.
42
43 THE COMMISSIONER: Yes.
44
45 **LUNCHEON ADJOURNMENT**
46
47

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UPON RESUMPTION:

MS LONERGAN: Could Detective Inspector Parker resume in the witness box, please.

Q. Detective inspector, you're on your former oath.
A. Yes.

Q. We were just working through your statement and we are nearly at the end of the matters raised in it. In annexure E is an investigator's note prepared by Detective Sergeant Jeffrey Little at page 328. Did you review the note prepared by Detective Sergeant Little at or around the time it was prepared?
A. Yes, I did.

Q. Is it an accurate note of at least that part of the conversation recorded in it?
A. Yes.

Q. And why was that conversation important to record in that way?
A. That was the first occasion when Mr Fox informed us that he had nothing further that he could supply.

Q. Are you aware of an email exchange between Detective Sergeant Little and Detective Chief Inspector Fox which goes through in some detail certain matters raised by Detective Chief Inspector Fox in an email in April 2012, which is annexure F to your affidavit?
A. Yes.

Q. Annexure F is the email from Detective Sergeant Little to Detective Chief Inspector Fox. Do you see that?
A. Yes. I am just having a look.

Q. Page 329?
A. Basically, it is a chain of emails rather than one particular email, but it does contain the email that you refer to.

Q. What was the purpose of that chain of email exchanges in terms of your position as crime manager with an overarching supervisory role over Lantle?
A. Detective Sergeant Little and I discussed the best possible way to ensure that we had everything that was

1 available to us and that there could be no speculation or
2 error in any later proceedings regarding what it was that
3 Mr Fox had with regard to evidence. That was the final
4 attempt by Detective Sergeant Little to ensure that he'd
5 covered every possible area that he could.
6

7 Q. Were you satisfied that that had the desired effect
8 and that you had an appropriate level of detail and
9 response from Detective Chief Inspector Fox?

10 A. Absolutely. At that point, which I think was what you
11 were alluding to earlier, that was when I was satisfied
12 that he had said that he had nothing more that he could
13 give us.
14

15 [Transcript suppressed from page 1518, line 15 to page
16 1520, line 41
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MS LONERGAN. those are my questions in chief.

THE COMMISSIONER: Thank you, Ms Lonergan. Mr Cohen?

[Transcript suppressed from page 1520, line 46, to
page 1522, line 22]

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<EXAMINATION BY MR COHEN:

MR COHEN: Q. Detective inspector, do you have a copy, as I think you do, of your witness statement in the witness box?

A. I do.

Q. Could I ask you kindly to move in it to paragraph 12. Indeed, can I simply ask you this question: have you, in your mind, a good current understanding of what you've put in paragraphs 12 to 14 inclusive or would you like a moment to reread them?

A. I'll read them.

Q. Would you kindly do that?

A. Absolutely. (Witness reads document). How far, sorry.

Q. Just to the end of paragraph 14, which is at the top of page 312.

A. Yes.

Q. Having regard to that material and, as I understand it, is those paragraphs are the background, the lead-up to

1 the meeting of 2 December --
2 A. From my perspective, yes.
3
4 Q. That's a fair way of putting it?
5 A. Yes.
6
7 Q. Do you tell the Commissioner, as I think your evidence
8 goes to this, that before your formal transfer into the
9 substantive role of one of the positions of crime manager
10 in the Newcastle Local Area Command in March 2011, that
11 your knowledge of Strike Force Lantle was limited really to
12 a general briefing and some basic information?
13 A. Yes, it was very limited.
14
15 Q. And that basic information was what you had gleaned,
16 I think your evidence was, when you went to the materials
17 provided to you by Inspector Townsend?
18 A. Yes.
19
20 Q. And from the briefings, the oral briefings you got?
21 A. And the documents.
22
23 Q. Yes. Those oral briefings, if I understand your
24 evidence correctly - please correct me if I am wrong in
25 this - occurred very late November or early December of
26 2010?
27 A. Yes.
28
29 Q. Before the time of the briefing that you got, and I'll
30 call it, for the sake of an arbitrary date, on or around
31 1 December 2010, the day before or leading up - I'm sorry
32 I'll withdraw that. It is a difficult question. There
33 were a couple of days, I think your evidence was this
34 morning, leading up where you were reading materials
35 progressively; is that right?
36 A. Yes.
37
38 Q. It might have been as early as, say, 30 November?
39 A. It might have been even earlier than that.
40
41 Q. Even earlier than that. So maybe a week roughly?
42 A. I don't --
43
44 Q. For the sake of an arbitrary number, say it was the
45 previous Monday.
46 A. Right, yes.
47

1 Q. Before that time you had little or absolutely no
2 understanding of Strike Force Lantle; would it be fair to say that a
3 fair --
4 A. That's fair.
5
6 Q. I need to take you to some of the documents. You have
7 access - to your right just outside the witness box -- to
8 volume 2 of the bundles. If you could pick that up,
9 please, and if you would go in that bundle to tab 98. It
10 is marked along the side, I think you can see.
11 A. Yes.
12
13 Q. Mr Hunt's injunction to Detective Chief Inspector
14 Humphrey yesterday was a wise one - they tend to rebel,
15 those folders.
16 A. Yes.
17
18 Q. This is your investigator's note dealing with contact
19 on 8 April, I take it?
20 A. Yes.
21
22 Q. Is your evidence to the Commissioner also that, even
23 as late as this date, you were not across the full scope of
24 the Strike Force Lantle holdings and materials and facts
25 and circumstances?
26 A. Yes.
27
28 Q. Indeed, to paint the relevant picture of the time, you
29 had quite recently come into the command as one of the two
30 crime managers, had you not?
31 A. My recollection was 27 March.
32
33 Q. I assume, to put it in the vernacular, you were
34 getting your arms and legs wrapped around a big workload?
35 A. Yes, that's correct.
36
37 Q. I take it by virtue of that, this was certainly not
38 high on the list of pressing or urgent or very much
39 immediate business; is that right?
40 A. It was just another one of the matters that I had to
41 become acclimated to.
42
43 Q. Yes. You did that in time, but not as a priority?
44 A. No.
45
46 Q. Even around this date, 14 April, having regard to the
47 fact that the file note is that date, referring back to a

1 conversation on 8 April, is it a fair proposition, should
2 the Commissioner understand, that at that time you were
3 still with rather sketchy knowledge of the facts and
4 circumstances even at the time you got the phone call from
5 Joanne McCarthy?
6 A. Of the actual holdings and - yes.
7
8 Q. And, indeed, the background facts and circumstances,
9 if I can use that description, of what Lantle was?
10 A. Yes. I knew what it was - but yes.
11
12 Q. Indeed, yes. Let's explore this very carefully, in
13 fairness to you. I take it by this stage, by the time
14 of the discussion with Joanne McCarthy, by telephone on
15 8 April, which is what you refer to in this memorandum?
16 A. Yes.
17
18 Q. Albeit it, it occurred about a week later?
19 A. Yes.
20
21 Q. But it is talking as at 8 April?
22 A. 8 April is the first bit.
23
24 Q. At that date, at the time of the conversation,
25 presumably you had perhaps even slightly degraded memory of
26 what you had looked at in late November or early December
27 of 2010 at the time of this conversation?
28 A. Yes. I had - on 2 December that you're talking about,
29 I had no knowledge of the actual intricacies of all of it.
30 All I was aware of at that point was region's position and
31 region's opinion of who was leaking the information.
32
33 Q. You had read material about that up to and just before
34 the meeting?
35 A. Yes.
36
37 Q. You hadn't done anything further after the meeting?
38 A. No.
39
40 Q. And by the time you'd come into the job, you hadn't
41 done any more either?
42 A. No.
43
44 Q. At the time of this discussion by telephone on 8 April
45 your information was whatever you still had in front of
46 mind --
47 A. And what I'd read.

1
2 Q. Pardon me?
3 A. And what I'd read.
4
5 Q. And when did you read that?
6 A. In the period between the 27th and the 8th, what I'd
7 got across.
8
9 Q. But it was your memory in April of what you had read
10 in late November, early December?
11 A. No, no, what I'd read when I took over. Like, the
12 moment I became, for want of a better term, the crime
13 manager at Newcastle, I was - had managerial access of
14 e@gle.i. so I was able to read then the holdings of Strike
15 Force Lantle, which prior to that I hadn't done.
16
17 Q. When did you do that?
18 A. In the period between the 27th and the 8th.
19
20 Q. Of April?
21 A. 27 March, 8 April.
22
23 Q. Very well. When you spoke to Ms McCarthy, you
24 indicate, don't you, in your statement that your
25 understanding, even at this time, was still limited to what
26 I think you call some basic information; is that right, or
27 am I wrong in that?
28 A. I'm trying to find where I termed it. Look, I would
29 agree that I wasn't right across the brief, if that's what
30 you're asking, absolutely.
31
32 Q. And you, to some extent, got the phone call from
33 Ms McCarthy out of the blue?
34 A. Yes.
35
36 Q. Accordingly, at the time that you got her phone call,
37 it was something that occurred but without notice and you
38 were dealing with it as best you could, but in effect, on
39 the run; is that a fair way to put it?
40 A. I just told her that I was - would you actually like
41 me to actually read it on to the record? I was - I had
42 just taken carriage of the matter and it was my intention
43 to familiarise myself with the investigation plan over the
44 weekend.
45
46 Q. Thank you. I'm grateful for that. Could I ask you to
47 cast your mind back in time to the time when you were

1 initially being briefed by Assistant Commissioner York, and
2 I think Inspector Townsend at the time, and this is, on
3 your evidence, late November of 2010?

4 A. Yes.

5
6 Q. You identify in your statement, in particular, I think
7 at the foot of page 312 in paragraph 14 - I take it when
8 you say "I was made aware", that relates back to this
9 general briefing from Ma'am York and Inspector Townsend?

10 A. From Ma'am York and Inspector Townsend, yes, that's
11 correct.

12
13 Q. You were made aware that Newcastle City Local Area
14 Command was reluctant to take carriage of the
15 investigation. Is that something that, in this bit of
16 background briefing you were getting, was identified by the
17 regional commander, Assistant Commissioner York, as a
18 particular concern to her?

19 A. No, I don't think so. It was a normal police
20 progression. Ma'am York wanted it made clear to all
21 involved that it was region's determination that Newcastle
22 would do it. I now, having been privy to the hearings,
23 understand why that was the case.

24
25 Q. I think we're slightly at cross-purposes. Before the
26 time of the meeting, you were given an instruction to go to
27 the meeting --

28 A. Yes.

29
30 Q. -- this is 2 December, and make it clear to all
31 concerned that Newcastle was to take the matter. That's
32 so, isn't it?

33 A. That's correct.

34
35 Q. The reason for that was, I take it, and I take it the
36 Commissioner should also understand, because, if I can use
37 a phrase, Assistant Commissioner York was putting her foot
38 down and saying, "You will do as you're told. You will
39 take this matter, reluctant or not"?

40 A. You'll have to ask Commissioner York that. The
41 impression I got was that Ma'am York wanted that particular
42 message taken to the meeting.

43
44 Q. And you did it?

45 A. Yes.

46
47 Q. Given the briefing you had prior to the meeting - that

1 is to say, you were given materials, you read documents,
2 but you also had an oral briefing from Ma'am York in the
3 company of and presence of Inspector Townsend, I think, as
4 I understand your evidence?

5 A. Yes.

6

7 Q. And that message was what you were to take and
8 presumably why you were to be there as soon as the meeting
9 began; is that right?

10 A. I was to be there to ensure that region's two matters
11 were addressed.

12

13 Q. But you were told to be there at the beginning of the
14 meeting?

15 A. Yes.

16

17 Q. And not to be late?

18 A. Yes, absolutely.

19

20 Q. That was so that this message, as it were, from on
21 high could be delivered with clarity and without --

22 A. So I could return to Ma'am York and ensure her that
23 everybody at the meeting understand region's position.

24

25 Q. Apart from the fact that you were a little late, and
26 I assure you your secret is safe, it was the case that you
27 had a particular purpose of being there, and it was to
28 deliver this message?

29 A. Yes.

30

31 Q. Is it not the case that both the commander - I'm
32 asking you to have regard to the briefing you've got from
33 the commander, from Inspector Townsend at this meeting in
34 late November. Is it not the case that the commander and
35 Inspector Townsend had detected and were concerned about a
36 general reluctance across the region, if can I put it that
37 way, in respect of those LACs that had access to it or had
38 been confronted by this issue? There was a general
39 reluctance to deal with it, and I'm thinking particularly
40 of Lake Macquarie and Newcastle; is that right?

41 A. If that's the case, I wasn't briefed on that.

42

43 Q. Very well. Could I ask you again, as you did
44 initially when I first started asking some questions, and
45 I'm grateful - I want to take you to the burden of the
46 materials that deal with the facts of the meeting at the
47 time. As I understand the way your statement is arranged,

1 paragraphs 16 to 19 inclusive do that. Would you care
2 again to read those materials. Would you kindly do that?
3 Thank you?
4 A. How far do you want me to read?
5
6 Q. Just to the end of paragraph 19, because that deals
7 with the events of the day.
8 A. (Witness reads document). Yes.
9
10 Q. Thank you. I'm right, am I not, that is your evidence
11 about the events of that particular day?
12 A. Yes.
13
14 Q. Apart from, if I can say, two more things - the
15 annexing by you of a copy of the investigator's note that
16 was prepared by Detective Senior Sergeant Quinn and your
17 own handwritten note to the same effect, so annexures A and
18 B?
19 A. That's correct.
20
21 Q. That's the totality of your evidence about the events
22 of the day, 2 December 2010?
23 A. Yes.
24
25 Q. You tell the Commissioner, I think I understand - and
26 please confirm this or correct me if my understanding is
27 wrong - that the investigator's note - that is annexure A
28 to your statement - accords with what occurred during the
29 meeting?
30 A. In general terms, yes.
31
32 Q. At least so far as you were a witness to it?
33 A. Yes.
34
35 Q. I think when you were being first led through your
36 evidence by my learned friend Ms Lonergan you were taken to
37 this investigator's note but again, so I'm completely sure
38 and you are too, do you need a quick opportunity to review
39 its terms just to have it front of mind, as it were? Would
40 that be of assistance to you?
41 A. It is a rather long thing. I'll probably --
42
43 Q. Yes. It starts at page 318, using the pagination
44 numbering at the foot of the page.
45 A. Yes.
46
47 Q. Do you wish to have a quick look --

1 A. That's the part you want me to read?
2
3 Q. What I want to know is: do you need to go back to it
4 to be across the material? I take the answer is yes?
5 A. Yes.
6
7 Q. Please do that.
8 A. (Witness reads document). I have read page 318,
9 Mr Cohen.
10
11 Q. As a matter of the general period of your attendance
12 at the meeting, do you see that the investigator's note
13 refers in substance to either two parts to the meeting or,
14 in effect, two meetings?
15 A. Sorry, I have only read 318, but that's correct.
16
17 Q. That's identified, in particular, at page 319, the
18 second page of the note, and it is disclosed by the fact
19 that the single sentence, which is the second last sentence
20 on the page, identifies, "Detective Inspector Parker
21 arrived at this stage of the meeting"?
22 A. Yes.
23
24 Q. You accept that's when you got there?
25 A. No.
26
27 Q. Really? You say this note is not accurate, do you?
28 A. I don't say it is not accurate. I say that I don't
29 accept that's when I arrived. I don't know when I arrived.
30
31 Q. Let 's explore that.
32 A. Yes.
33
34 Q. If it is accurate - let me start from that
35 proposition. Do you tell the Commissioner that this note
36 is accurate as far as you understand it?
37 A. I think I believe I said it is accurate to the best of
38 my recollection.
39
40 Q. Yes. Does not that mean that it is accurate including
41 the time that it affixes that you arrived --
42 A. It does affix a time, Mr Cohen.
43
44 Q. It does in substance, doesn't it?
45 A. No.
46
47 Q. Not with respect to an actual time, but with respect

1 to after a certain period of business is transacted?
2 A. I'm sorry, but I won't concede that indicates any time
3 whatsoever.

4
5 Q. Let me put it to you directly. I put this to you,
6 that you arrived at the meeting with about five minutes of
7 it left to run?

8 A. No, that's not --

9
10 MS LONERGAN: I object. We need some clarity about "five
11 minutes left to run". Five minutes from Detective Chief
12 Inspector Fox's point of view or five minutes from the
13 overall meeting?

14
15 MR COHEN: Five minutes from the overall meeting. I'm
16 sorry if that was unclear. Let me clarify it.

17
18 Q. There was a period when Detective Chief Inspector Fox
19 arrives and when he leaves. You are relevantly put as
20 arriving at a time about five minutes before, I put it to
21 you, before he left.

22
23 MS LONERGAN: I object. I'm sorry, I understand.
24 I withdraw the objection. I assume "he" is Detective Chief
25 Inspector Fox

26
27 MR COHEN: I'll make that abundantly clear.

28
29 THE COMMISSIONER: Thank you Mr Cohen.

30
31 MR COHEN: Q. Having regard to how this investigator's
32 note is constructed, the proposition I'm putting to is
33 that, in the period when Detective Chief Inspector Fox was
34 present - call it the first meeting or the first half of
35 the meeting, however it suits to understand it, he was not
36 there for the whole of the meeting - I put to you that you
37 arrived about five minutes before the time that he left the
38 meeting; that is, before Detective Chief Inspector Fox left
39 the meeting?

40 A. There's nothing to indicate that. I'm sorry, but
41 that's not my recollection of it.

42
43 Q. Very well. Your earlier evidence this morning, and
44 I think it was before the luncheon adjournment in response
45 to questions by my learned friend Ms Lonergan, when she
46 asked you about how you could hear things that appeared to
47 have occurred before you arrived, was that you said they

1 might have been said twice. That was your evidence, wasn't
2 it?
3 A. Yes.
4
5 Q. You accept that there's nothing in the file note that
6 identifies such a repetition of these matters, is there?
7 A. There's nothing to say there's not.
8
9 Q. I beg your pardon?
10 A. There is nothing to indicate that it wasn't said
11 twice.
12
13 Q. It is in the nature of such --
14 A. Mr Cohen, perhaps can I tell you there. All I can
15 tell you is that I made notes like everyone - well, not
16 like everyone, but like some other people at the meeting
17 and my notes are those presented at annexure B, and that is
18 my evidence.
19
20 Q. Those notes give a narrative of matters that lasted a
21 very short time, don't they?
22 A. Sorry?
23
24 Q. Those notes at annexure B give a narrative of events
25 that lasted a very short time?
26 A. Absolutely.
27
28 Q. And that's what I'm putting to you, detective
29 inspector.
30 A. You're putting to me that I arrived with five minutes
31 remaining in the meeting. I have no idea how long was
32 remaining in the meeting --
33
34 Q. No, I'm not putting that at all. I'm putting to you
35 that you arrived at the meeting and joined the meeting five
36 minutes before Detective Chief Inspector Fox left?
37 A. Sorry, now I am confusing you. I understand what it
38 is you're saying to me. I have no idea at all whether it
39 was five minutes or 15 minutes or whatever.
40
41 Q. The other proposition I'm putting to you is that the
42 matters that are identified in the investigator's note, the
43 author of which was Detective Senior Sergeant Quinn,
44 identified in the investigator's note at pages 318 to 319,
45 identified as occurring before the time you arrived at the
46 meeting, you could not possibly have witnessed; isn't that
47 right?

1 A. Sorry, could you repeat the question?
2
3 Q. Certainly. At page 319, the investigator's note
4 identifies that you arrived, and it simply says, "Detective
5 Inspector Parker arrived at this stage of the meeting." Do
6 you see that?
7 A. I do.
8
9 Q. The proposition I'm putting to you is that everything
10 that's recorded in the investigator's note before that
11 entry in the note occurred in your absence and you could
12 not possibly have heard what was said, could you?
13 A. That is if that's a correct chronology of this
14 meeting. All can I tell you, Mr Cohen, is that the notes
15 that I have recorded in my diary are my recollection of
16 what was said at that meeting. I will concede to you
17 they're not a particularly long account of what was said at
18 the meeting which would tend to indicate that I may not
19 have been there for a long time; however, they are my
20 recollection of what occurred.
21
22 Q. But your recollection of what occurred, and indeed
23 prompted by what is in your annexure B, your hand --
24 A. Yes.
25
26 Q. -- is the material that is recorded at the top of
27 page 320, is it not?
28 A. Quite possibly. I have no idea --
29
30 Q. Please have a look at 320. This is in your statement.
31 This is annexure A. It is marked page 320, I hope, at the
32 bottom of the page?
33 A. Yes.
34
35 Q. You've got it? It says:
36
37 *[Inspector] Parker indicated that the*
38 *Region's Commander's firm view [was] ...*
39
40 And it recites the very proposition you've given in
41 evidence before?
42 A. Yes.
43
44 Q. That proposition, in that investigator's note at that
45 point, is what is recorded by your own handwritten note in
46 annexure B, is it not?
47 A. Some of it.

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Q. And anything else that's recorded there occurred after that point in time, didn't it?

A. Could you repeat that?

Q. Anything that you say occurred in your handwritten note at annexure B was your evidence a moment ago that this investigator's note, annexure A, records some of what's in your handwritten note?

A. Yes.

Q. Anything else in the handwritten note occurred in the chronology of these events, on this investigator's note, annexure A, after that point in time in the note; that is, following on from that point, page 320 that I've just taken you to - that must be so, surely?

A. I can only reiterate again, Mr Cohen, that what is recorded in annexure B is my recollection of the meeting I'm sorry if that doesn't fit with the chronology or whatever you're trying to point at, but that's my recollection and they were made at the time. So I'm going to stand by those notes.

Q. You concede --

A. No, I don't.

Q. Wait for the question. Do you concede, detective inspector, that there is an inconsistency between maintaining this investigator's note, annexure A, is accurate and can be relied upon but only to the point in time when it suits you not to?

A. No, I don't, Mr Cohen. I don't, at any stage in Senior Sergeant Quinn's investigation, note that that is purported to be a time-based chronology of what occurred. I'm sorry, but I don't.

Q. But it is not a question of it being fixed in particular times in the way, say, a transcript is; it is this proposition - the investigator's note, annexure A, records that you arrived at a point in time, that is, evidently on the face of page 319. It also must be logically the case that if you arrived at that point in time, you heard none of what occurred and transpired at the meeting before that point in time.

MR ROSER: I object to this. This is the fourth time we have been over this territory, Commissioner. The witness

1 has answered the question on every other occasion. There's
2 got to be a limitation on how many times the proposition is
3 put.
4

5 THE COMMISSIONER: Q. Sir, is your answer the same?

6 A. I was about to say I'm quite happy to answer that.
7 I can only reiterate again, Mr Cohen, that annexure B are
8 the handwritten notes that I made at the time, and I can't
9 help that they don't coincide with your appraisal of what
10 you'd like said.
11

12 MR COHEN: Q. Let me put to you your evidence this
13 morning when you said that what was identified in your
14 statement must have occurred because it was said on the
15 second occasion can't possibly be correct; that's the case,
16 isn't it?

17 A. You can put it to me however you like. I again
18 reiterate to you that annexure B are the handwritten notes
19 that I made of that meeting at that time. If they don't
20 fit with what you like, I apologise, but there's nothing
21 I can do about it. The fact of the matter is that's the
22 truth and all I can tell you, I'm sorry, is the truth. If
23 you don't accept that, that's fine I can probably live with
24 that. I'm not going to, for a moment, suggest to the court
25 I'm going to lose any sleep tonight over it, but that's
26 just the facts.
27

28 Q. To ensure we're not at cross-purposes, I need to put
29 this point to you. You gave evidence before the luncheon
30 adjournment, when learned senior counsel was examining you
31 about these matters in respect of this investigator's note,
32 that if it is not recorded there, it must be because it was
33 said twice. That's your evidence, wasn't it?

34 A. It could have been said 15 times, Mr Cohen. I don't
35 know how many times it was said. Yes, it was my evidence.
36 It may have been said twice, it may have been said
37 10 times. All I can tell is you that what I have recorded
38 in my diary and is annexed to my statement, at annexure B,
39 is a handwritten note from my diary that was made at the
40 time, and that is my recollection of what I heard at the
41 meeting. I'm sorry; like, I don't know what more I can
42 tell you in relation to it.
43

44 Q. I put it to you that your evidence this morning about
45 hearing these matters twice, given in response to the
46 question --

47 A. I didn't say I heard them twice, Mr Cohen.

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Q. You didn't say that?

A. I said perhaps they were said twice.

Q. Well, whatever way you want to put it, whether you heard it or you said "perhaps they were said twice", I put it to you that the evidence you gave this morning in response to senior counsel's questions was tailored to meet the exigencies of this case because you cannot explain the inconsistency here. That's right, isn't it?

A. No, Mr Cohen. All I can tell you is that the handwritten note that is attached at annexure B is the handwritten note that I made in the meeting at the time. I'm sorry, if that doesn't fit with the chronology that - the time-based chronology that you seem to think appears at annexure A. I honestly can't see a time-based chronology there. If you see one, that's fine - I can't. All I can tell is you that annexure B is the attached copy of my diary that was made at the time.

MR COHEN: I think I have what I need, Commissioner. I'll move on.

Q. Would you look at paragraph 31 of your statement, please.

A. Yes.

Q. And then paragraph 32 is with it. Would you just scan that quickly, please.

A. Yes.

Q. You tell the Commissioner that you had everything, in effect, that you needed as a result of coming to grips with the file in March of 2011?

A. I'm sorry, I couldn't hear you?

Q. I beg your pardon. Do you tell the Commissioner that you had everything you needed from DCI Fox by the time you came into the role in March 2011. Is that the burden of what you say in paragraph 31?

A. No.

Q. Your belief was that he had produced copies of all relevant information he had?

A. Yes.

Q. Does that mean that you had from him everything that

1 you needed?
2 A. No. That means I believed he'd produced all the
3 documentation he had. Sorry if it doesn't --
4
5 Q. That's all right. You then go on to say you realised
6 that DCI Fox had forgotten to bring copies to the meeting
7 on 2 December. But you were aware, weren't you, that that
8 same day those materials were provided in some form of
9 interoffice transfer between --
10 A. No --
11
12 Q. -- where he was?
13 A. Are you talking about right here?
14
15 Q. I beg your pardon?
16 A. What particular point in time are we talking about?
17
18 Q. You're dating this at March 2011.
19 A. Yes and that's --
20
21 Q. You make reference back?
22 A. Yes, absolutely.
23
24 Q. -- to 2 December?
25 A. I just wanted to make sure that that was the period
26 you were talking about. I wasn't aware of - I don't
27 remember when I became aware, but it wasn't at this point -
28 how they were ferried, but as soon as I spoke to Detective
29 Sergeant Little, I was aware that the documents that hadn't
30 arrived at the meeting had arrived in the holdings.
31
32 Q. Yes?
33 A. Yes.
34
35 Q. Then you say that, after several discussions with
36 Detective Sergeant Little, you decided a more formal
37 approach would work. When were discussions with Detective
38 Sergeant Little to which you refer in paragraph 32?
39 A. Basically we had been having discussions since I took
40 over. There was a meeting on, I believe it was 13 April,
41 with Detective Inspector Jacobs, which was basically the
42 genesis point of our investigation. When I say "our
43 investigation", the investigation conducted by myself - or
44 well, by Detective Sergeant Little with me oversighting it.
45
46 Q. Is this in the year 2011?
47 A. Yes.

1
2 Q. You, Detective Sergeant Little, Detective Inspector
3 Jacob had a discussion to consider the investigation plan.
4 A. Yes, and --
5
6 Q. I beg your pardon?
7 A. Yes, the investigation plan.
8
9 Q. That consideration informally, but then presumably
10 more formally with the work of Detective Sergeant Little,
11 produced the document, did it?
12 A. Yes.
13
14 Q. An investigation plan which could be embraced and
15 adopted, in a formal way?
16 A. Yes.
17
18 Q. And go on to the file and everybody would have their
19 working plan document for the purposes that had to be
20 undertaken to discharge your tasks?
21 A. Yes. Well, all e@gle.i investigations are internal
22 investigations.
23
24 Q. That occurred relatively promptly, did it, from the
25 time this paragraph speaks; that is to say, when you and
26 DI Jacob and Detective Sergeant Little got together, what
27 was the period of time that flowed before you got to that
28 point with an investigation plan with which everybody was
29 happy and could go on to the file and you could be --
30 A. The investigation plan was prepared by the detective
31 sergeant prior to the meeting on the 13th. However
32 amendments were made as a result of that meeting.
33
34 Q. But it was well advanced?
35 A. I think it was nearly complete.
36
37 Q. And the few amendments didn't take very long to be
38 implemented?
39 A. No.
40
41 Q. Being quite arbitrary, but nonetheless it seems to be
42 a sensible point in time, by the end of April that process
43 of completing the investigation plan --
44 A. You'll have to ask Detective Sergeant Little. I don't
45 recall when he completed it.
46
47 Q. It is not a fanciful proposition that it occurred

1 around about that time, relatively promptly after the
2 meeting?
3 A. I've got no idea. I would imagine so. Detective
4 Sergeant Little is a fairly efficient officer, so I imagine
5 it was completed fairly soon after that.
6
7 Q. For the sake of allowing a little leeway, I'm just
8 trying to understand when this was likely to have happened.
9 You're not sure, it might have been late April, possibly
10 into May, but presumably by the end of May, given the
11 efficiency of Sergeant Little, you would have the
12 investigation plan --
13 A. Sorry, I missed that as a result of Ms Sullivan's
14 cough. No, that's all right. Could you repeat it again.
15
16 Q. Sure. By virtue of this discussion and by virtue of
17 Sergeant Little's industry, presumably by late April or
18 some time into early May, there was an investigation plan
19 that was in final form with which everybody was happy and
20 could act upon?
21 A. Oh, I wouldn't like to put a date on it. I have no
22 idea, to be honest. You could have adduced that from
23 Detective Sergeant Little if that was an issue. I have no
24 idea.
25
26 Q. No, it is not an issue; simply I want to be fair to
27 you.
28 A. I have no idea, Mr Cohen. As I said, there was one in
29 place for all intents and purposes before the meeting.
30
31 Q. All right, let's work from that one. So by the time
32 of the meeting, which is April, you had a working document
33 that was all but final, a few minor amendments that could
34 be relied upon. Did that document include within its
35 relevant contents a reference to obtaining from Detective
36 Chief Inspector Fox appropriate information by way of a
37 debriefing or interview?
38 A. Yes.
39
40 Q. What did it identify as the necessary time for that to
41 occur?
42 A. It didn't.
43
44 Q. I see. Speaking at April 2011, even in a working
45 draft sense, but not a final document sense --
46 A. Yes.
47

1 Q. -- there was a plan, even in an informal way, that
2 Detective Chief Inspector Fox would be
3 interviewed/debriefed?
4 A. Yes.
5
6 Q. Is that a fair statement?
7 A. Yes.
8
9 Q. Why did that not occur until April 2012?
10 A. I thought I'd answered that, but I am happy to do it
11 again.
12
13 Q. Pardon me?
14 A. Sorry, I thought I'd answered that in chief. That was
15 as a result of - we were doing other things. As I said, by
16 his own admissions, most of what Detective Fox had had come
17 from Ms McCarthy, on speaking with Ms McCarthy, on
18 occasions far too often for my liking. But there didn't
19 appear to be any urgency to debrief Mr Fox regarding
20 anything. I presumed that he'd handed over all his
21 documents. That was just the time that we'd followed
22 through all the other lines of inquiry and we got around
23 to move on to chief - I'm sorry, we got around to Mr Fox.
24
25 Q. Did you have a discussion on this topic also with
26 Detective Chief Inspector Humphrey when he was the acting
27 commander?
28 A. When we were going to debrief Mr Fox?
29
30 Q. Yes.
31 A. No.
32
33 Q. Not at all?
34 A. Not that I recall.
35
36 Q. Excuse me, detective inspector, and excuse me,
37 Commissioner. Can I ask you to look at page 341 in your
38 annexure to your statement, in effect?
39 A. Yes.
40
41 Q. It is part of what is annexure G.
42 A. Yes.
43
44 Q. You've got 341?
45 A. I have it.
46
47 Q. There is a comment. This is a document dated

1 19 November 2012. It is part of a three-page document that
2 was provided by you to Assistant Commissioner York, was it
3 not?

4 A. Yes.

5
6 Q. It arose because of some media interest in matters,
7 amongst other things, didn't it?

8 A. It arose because Ma'am York asked me the question
9 which is the issue at the top.

10
11 Q. You say in 341, as your conclusion:

12
13 *What is, however, quite apparent is the*
14 *Strike Force's willingness to accept*
15 *assistance from [DCI] Fox, even when he*
16 *appeared to display an absence of*
17 *enthusiasm to do so.*

18
19 A. Yes.

20
21 Q. That was just a gratuitous comment, wasn't it?

22 A. No, not at all.

23
24 Q. What absence of enthusiasm had been disclosed on the
25 Lantle file by DCI Fox?

26 A. I believe in the 2010, 2 December meeting, he was
27 asked to produce documents.

28
29 Q. Which he did, didn't he?

30 A. Not at the meeting.

31
32 Q. It was the same day, wasn't it?

33
34 MS LONERGAN: I object. There needs to be some
35 preliminary questions about the same day, in my respectful
36 submission.

37
38 MR COHEN: I'm sorry, I missed that.

39
40 MR ROSER: It wasn't the same day.

41
42 MR COHEN: Q. You know from your interrogation of the
43 e@gle.i holdings that what Detective Chief Inspector Fox
44 did when directed was to produce those material the same
45 day, don't you?

46
47 MR ROSER: I object to that. That's not the evidence. It

1 wasn't produced on that same day.

2
3 MS LONERGAN: Commissioner, the evidence is although
4 Detective Chief Inspector Fox said he collected the
5 material and handed it to someone, there may be some
6 ambiguity in the term "produced", and this witness has also
7 outlined his somewhat limited involvement in terms of an
8 active role in the paperwork of Lantle as it was at the
9 time. To be fair to the witness, he should be given the
10 opportunity to explain that.

11
12 MR COHEN: Q. I'll approach it this way. You know that
13 DCI Fox did what was necessary to send it that day in the
14 way directed, don't you?

15 A. All I know was that, at 2 December 2010, he was asked
16 to bring the documents to a meeting. He didn't do that;
17 right? That's one, and please let me finish. He refers in
18 a number of documents, on a number of occasions, to having
19 interviewed a number of witnesses - would you like me to go
20 to those documents?

21
22 Q. Detective inspector, I asked you a simple question.

23
24 MS LONERGAN: I object to this gentleman being interrupted
25 when he's trying to give an answer to the question, which
26 was a general one, asking whether and he knows about
27 DCI Fox's cooperation with requests. The officer is trying
28 to do so and he's being interrupted and that's not fair.

29
30 MR COHEN: My question wasn't a general question; it was
31 about --

32
33 THE COMMISSIONER: The lack of enthusiasm.

34
35 MR COHEN: No, we had moved from that. The last question
36 I put, as I understand it, was that he knew that DCI Fox
37 had dispatched the documents that day. It didn't need a
38 discursive response. It just needed, with respect, a "Yes"
39 or "No" answer. I'm not sure why I'm being chided by my
40 learned friend about that because I had moved past that
41 question because I had been told, and I thought properly,
42 I had to clarify the basis of it

43
44 THE COMMISSIONER: Weren't you putting to
45 Detective Inspector Parker that he had made a gratuitous
46 comment about Detective Chief Inspector Fox's lack of
47 enthusiasm --

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MR COHEN: I got well past that, I thought.

THE COMMISSIONER: I understood Detective Inspector Parker was still addressing himself to that question.

MR COHEN: Very well. I understand.

MS LONERGAN: So did I, Commissioner. The lack of enthusiasm comment, I apprehended the witness to be attempting to explain that.

THE COMMISSIONER: Why he said that.

MR ROSER: I agree with what my learned friend just said.

THE COMMISSIONER: Q. Would you continue to answer the question, sir.

A. I was trying to answer that

Q. Please continue.

A. Mr Fox alludes, on a number of occasions, in a number of documents and in a number of public forums, that he has interviewed a multitude of witnesses - both alive and dead, I think he refers to in one document - that he has interviewed members of the clergy, a number of members of the clergy. These are one of the premises he has constantly used to put forward the proposition that he's the person best placed to conduct this investigation. I don't know whether that's correct or not, but that's the premise he's put forward. But if that is correct, then he has never produced those documents to any member of Strike Force Lantle and, on those terms, I would suggest to you that he has been less than enthusiastic or whatever the term, sorry, was.

MR COHEN: Q. They were your words.

A. Yes, I know. I'm trying to get back to it, if you could just hold your bowlies for about two moments.

MS LONERGAN: Page 341.

THE WITNESS: "His apparent display of an absence of enthusiasm" - that is based on those particular facts, Mr Cohen, that your client has consistently, in the public arena, in documentation form, put out the fact that he has interviewed multiple people, that he has interviewed

1 members of the clergy, and I have seen none of those
2 documents, despite numerous requests from my organisation
3 which he shouldn't have to be asked to supply, at any rate.
4 He's a senior detective, Mr Cohen. He's more than aware
5 that the documents are not his documents. They are
6 documents that belong to the NSW Police Department and, if
7 available, could be more than happily used by Strike Force
8 Lantle. That is why I was unable to answer Ms Lonergan's
9 question earlier today as to whether I'm 100 per cent
10 certain he doesn't still hold documents. To be quite
11 honest, I have no idea what Mr Fox has.

12
13 MR COHEN: Q. And that little peroration is driven by --
14 A. Sorry, I don't understand what the word "peroration"
15 means.

16
17 MR ROSER: I object to the question put on that basis.
18 What the witness was answering the question put to him by
19 my learned friend.

20
21 THE COMMISSIONER: Yes. We'll just call it an answer
22 rather than a peroration.

23
24 MR COHEN: Q. That answer was simply an endeavour in the
25 witness box to demonstrate your dislike for DCI Fox, wasn't
26 it?

27 A. Mr Cohen, if you're going to ask me questions I'm
28 going to --

29
30 Q. Perhaps you will answer them, please.

31 A. I thought I answered it.

32
33 Q. I just asked you a question. Kindly answer it.

34 A. I'm sorry, could you repeat the question.

35
36 Q. Your evidence two questions ago, your response, was
37 simply an endeavour to make good on your dislike of
38 Detective Chief Inspector Fox, was it not?

39 A. My answer two questions ago was an attempt to answer
40 the question you asked me.

41
42 Q. The question was about an absence of enthusiasm and
43 your response was about anything other than that concept.

44
45 MR ROSER: I object to that. The response was directly
46 related to the question that was asked.

47

1 MS LONERGAN: I share that objection.
2
3 THE COMMISSIONER: Yes, I agree with the other counsel,
4 Mr Cohen.
5
6 MR COHEN: Q. So you take it, therefore, that when
7 Detective Chief Inspector Fox provided the lengthy email
8 response to the questions that were put by Detective
9 Sergeant Little, that was an absence of enthusiasm, was it?
10 A. Again, I reiterate, Mr Cohen, your client has gone
11 into the public arena into documentation form intimating he
12 has documents pertaining to interviews he has conducted
13 with witnesses, interviews he has conducted with members of
14 the clergy. Detective Sergeant Little, his question -
15 email was to try to solve some of the issues that your
16 client has created by confusing issues to a point beyond
17 what I would consider to be acceptable from a senior
18 officer --
19
20 Q. I see. So --
21 A. Just let me finish. I believe that the answers to the
22 questions, if you read them, that Detective Sergeant Little
23 asked, are little more an attempt to obfuscate the issue,
24 to be honest. That's the only way I could put it,
25 I believe that he was deliberately trying to muddy the
26 waters to a point - he was asked simple questions. He
27 didn't answer them. I don't think he was being cooperative
28 at all.
29
30 Q. Where in the public pronouncements that you have
31 identified in your earlier evidence of a few minutes ago
32 has Detective Chief Inspector Fox indicated that he holds
33 more documents or interviews?
34 A. In an email to me, is that - would that do?
35
36 Q. Which one is that?
37 A. It's the one on the 5th.
38
39 Q. Whereabouts is document so we can all follow it?
40 A. It is annexure - sorry, it's page 334-335.
41
42 Q. Sorry, page 334, did you say?
43 A. 334-335.
44
45 Q. Yes. Where does that say that he holds more
46 materials?
47 A. Sorry, I've got the wrong report.

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Q. Can I ask you also about that particular email that you've identified at 335?

A. Yes.

Q. Where in that document is there an evident lack of enthusiasm?

A. Well, perhaps the - it is a reply to this particular comment:

*Pete,
I know we spoke on the phone yesterday, but
I've only just read the report you sent
through --*

Which is actually the report I was looking for --

*the other day, and I just want to make sure
that there's definitely no other
statements, reports, diary entries or file
notes etc that relate to either McAlinden
or any concealment offences relating to
[Father] Fletcher, [AJ], [AL], [AK], or
Gogarty. Our investigation is just about
to finality and I just want to ensure we
haven't missed anything.*

Q. Where do you say his reply demonstrates a lack of enthusiasm?

A. I would think that that simply is a "Yes" or "No" answer. "Yes, I have more and this is what I have"; or "No, I do not."

Q. So answering in a more detail than a "Yes" or "No" answer is a lack of enthusiasm, is it?

A. Mr Cohen, there is no detail in that. It is nothing more than a diatribe.

Q. The reference to the report referred to you by just a moment ago --

A. Yes.

Q. -- is the report he provided to you after you said you hadn't received it, wasn't it?

A. Absolutely.

Q. And that you hadn't read it?

1 A. No. I said I hadn't read - I said I hadn't read the
2 report he was referring to.
3
4 Q. But you had, hadn't you?
5 A. No.
6
7 Q. You'd read it at the time you reviewed the holdings in
8 Lantle when you got into the job, hadn't you, in March
9 2011?
10 A. I had read a report. I had a report, absolutely.
11
12 Q. What you are doing is trying to set up a straw man to
13 knock it over, accuse someone of infractions which just are
14 fantasies to blacken their reputation?
15 A. Sorry, you've lost me there.
16
17 Q. It is a straightforward question. Aren't you setting
18 up a straw man to knock it over; that is, you are accusing
19 Fox of doing things he hasn't done --
20 A. No.
21
22 Q. -- to blacken his reputation amongst people in the NSW
23 Police Force?
24 A. No. Not, not at all.
25
26 Q. The fact that you can't find any reference to withheld
27 documents in the email that you could took me to or that
28 there is a lack no enthusiasm is for that very reason,
29 isn't it, because you're looking for reasons to make him
30 look bad, aren't you?
31 A. No. I'm just trying to find - (witness reads
32 document).
33
34 Q. The document which you said you didn't read is the
35 document that's in your bundle, your annexure G, at
36 page 371, isn't it? Is that right?
37 A. I'm looking for the one where he refers to - yes,
38 sorry, that one will do.
39
40 Q. Are there others?
41 A. Yes.
42
43 Q. Yes?
44 A. Yes.
45
46 Q. So there are others that you say you didn't read; is
47 that right? Am I understanding you correctly?

1 A. Sorry, that I didn't read?
2
3 Q. Well, you should listen carefully --
4 A. Sorry, I've lost track of the question. I thought you
5 were asking me about where the particular instances are
6 that he'd said things regarding - you know, the enthusiasm
7 side of things, so I've lost track of what we're talking
8 about.
9
10 Q. So the document at 371 through to 376, exhibits a lack
11 of enthusiasm, does it?
12 A. I don't have - mine stops at 371.
13
14 Q. I'm sorry, I beg your pardon.
15 A. Mine stops at 371.
16
17 Q. Look behind the red folder that divides them. It
18 possibly runs on past that.
19 A. Yes.
20
21 Q. Do you have it?
22 A. Yes, I do. The red thing?
23
24 Q. Yes.
25 A. Yes.
26
27 Q. Is the succeeding number of the pages you're looking
28 for behind that red divider in that bundle?
29 A. Well, you mean this side of it?
30
31 Q. Yes.
32 A. 311 to 345.
33
34 Q. Let's approach it this way. Do you have pages 372 and
35 following in that bundle you have with you in the witness
36 box?
37 A. Mine stops at 371, Mr Cohen.
38
39 MR COHEN: I apologise to you. I didn't realise that.
40
41 MS LONERGAN: Commissioner, it appears something must have
42 become detached. I asked some questions about 371 this
43 morning.
44
45 MR COHEN: Q. Detective, is that what's happened? It
46 appears to have fallen out.
47

1 MS LONERGAN: Do you want me to re-collate it for you. -.
2
3 THE WITNESS: No, I'll get there.
4
5 MR COHEN: Q. If you're going to do it, so it is clear,
6 would you look for, apart from pages 371, pages 372 to 376
7 inclusive? You have got those now?
8 A. No. 376.
9
10 MS LONERGAN: We have a copy that's securely clipped for
11 the benefit of the witness.
12
13 THE COMMISSIONER: Thank you, Ms Lonergan.
14
15 MR COHEN: Q. Those clips are treacherous and that's
16 what's happened to you. I am sorry if you've not been
17 embarrassed in the witness box. That was certainly not my
18 intention.
19 A. No, I've been embarrassed in a lot worse situations
20 than - 371. Sorry, Mr Cohen, as I said, I actually thought
21 we were still addressing the enthusiasm thing. That was
22 one of the thing - he intimates there. Are we dealing with
23 that or not, sorry?
24
25 Q. No, we're not. I want to ask you this question. That
26 document, the first question you answered because you
27 recognised the front page --
28 A. Yes.
29
30 Q. -- the one that you said you hadn't read, but you had,
31 hadn't you?
32 A. No, I never said I never read that.
33
34 Q. You read it when you read the holdings --
35 A. Yes.
36
37 Q. -- in Lantle at the time you came into the meeting?
38 A. Absolutely.
39
40 MR ROSER: I object to that question. This witness has
41 said on numerous occasions, both in chief and in
42 cross-examination, that he read that particular document
43 back in 2010.
44
45 THE COMMISSIONER: That's right, isn't it, Mr Cohen?
46
47 MR ROSER: So the proposition that is put by my learned

1 friend is incorrect.
2
3 MR COHEN: He said to Detective Chief Inspector Fox he
4 hadn't seen it. That's what I was exploring.
5
6 MS LONERGAN: I object. There's an assumption there that
7 hasn't been explained.
8
9 MR COHEN: I withdraw the question. Let me withdraw it so
10 there's no difficulty. I'll put it this way.
11
12 Q. That document in totality that you have in the witness
13 box --
14 A. Yes.
15
16 Q. -- what about that document from 371 to 376 discloses
17 a lack of enthusiasm?
18 A. I think it went back to documentation, didn't it? He
19 said he interviewed --
20
21 MS LONERGAN: The witness probably should be given five,
22 at least, uninterrupted minutes to read that without
23 pressure. It is a long document and questions are being
24 asked about the merits and inclusions in it.
25
26 THE COMMISSIONER: Yes.
27
28 MR COHEN: I'm happy with that. Could you kindly read it
29 detective inspector?
30 A. Thank you.
31
32 THE COMMISSIONER: Will I take a short adjournment?
33
34 MS LONERGAN: If you would, thank you.
35
36 **SHORT ADJOURNMENT**
37
38 MR COHEN: Q. You've read the document?
39 A. I have.
40
41 Q. What in that document discloses a lack of enthusiasm
42 on the part of Detective Chief Inspector Fox?
43 A. No, I'm sorry, I was incorrect. That is not the
44 correct document.
45
46 Q. You still have the second volume of the bundle in the
47 witness box with you, part of your statement?

1 A. Yes.
2
3 Q. Could I ask you to go in it to the documents behind
4 tab 98.
5 A. That's where we are, yes.
6
7 Q. Very well. That's your investigator's note of
8 14 April?
9 A. Yes.
10
11 Q. Would you go forward in it to page 448. You identify
12 in the last full paragraph about three-quarters of the way
13 down the page, where it starts off, "Although my
14 knowledge"; do you see that?
15 A. Yes.
16
17 Q. You record there:
18
19 *Although my knowledge, at this time, is*
20 *very limited ...*
21
22 A. Yes.
23
24 Q. That is as at 14 April. You, nonetheless, go on to
25 express an opinion, just from the conversation with
26 Ms McCarthy, that someone is leaking within the
27 organisation.
28 A. Yes.
29
30 Q. You go on to identify that as DCI Fox, don't you?
31 A. And I believe DSC McLeod.
32
33 Q. You then identify, "Without any prior knowledge of"
34 what you identify as a relationship with Ms McCarthy,
35 "I can only speculate as to why this would be the case"?
36 A. Yes.
37
38 Q. That's all this was. It was just pure base
39 speculation, wasn't it?
40 A. No, it is my opinion, Mr Cohen.
41
42 Q. But it was just speculation, wasn't it?
43 A. Well, if it was speculation, it was a pretty almost -
44 what would you say? - psychic speculation because it turned
45 out to be 100 per cent correct.
46
47 Q. You call it speculation in your own document, don't

1 you?

2

3 THE COMMISSIONER: That's not quite fair, Mr Cohen. The
4 reason for the leak is the area for speculation. The
5 reason that has been --

6

7 MR COHEN: I'm sorry.

8

9 Q. Would you go forward to page 449. You record there,
10 presumably as your opinion:

11

12 *It is difficult to say why DCI Fox would*
13 *wish to be in charge of this investigation*
14 *given that most experienced investigators*
15 *would quickly identify it as one which*
16 *would fall into the category of*
17 *'undesirable'.*

18

19 A. Yes.

20

21 Q. What does "undesirable" mean --

22 A. It means they wouldn't want to do it.

23

24 Q. -- in the context of investigating child sexual abuse?

25 A. You might find this difficult to believe but it's got
26 nothing to do with child abuse. Most detectives like to
27 win matters and unfortunately our record in relation to
28 those particular type of matters is not great, for one
29 reason or another. It is just the way the law is. In
30 saying that, that doesn't indicate any - that they won't do
31 a 100 per cent satisfactory job. It just indicates that
32 there are no - I'm sure if you asked Paul Gallen last night
33 was he enthusiastic about running smack into the Queensland
34 pack of forwards, he would probably say no, but it doesn't
35 mean he didn't do it. So that's - yeah, absolutely,
36 I would suggest to you that it would fall into the category
37 of undesirable.

38

39 Q. Does that betray a position where you only want the
40 easy briefs of evidence?

41 A. I don't even think it reflects whether it is easy or
42 difficult. It just says "undesirable".

43

44 Q. "Undesirable" is a very definite word, isn't it?

45 A. It is; it is undesirable.

46

47 Q. It is undesirable because it's --

1 A. It doesn't say it's undesirable because it's
2 difficult. You put it to me that it was difficult.
3 I didn't say that. I said it's undesirable.

4
5 Q. Isn't that because it's difficult?

6 A. No, not necessarily. Mr Cohen --

7
8 Q. Please, wait for the question.

9 A. It's an answer to your question. Most detectives find
10 child sexual abuse rather unsavoury. I'm sorry if that
11 offends you but it is the truth. They find it - most of
12 them are married men with children and they find it
13 particularly abhorrent. I don't think it's unfair to say
14 that if it could be - if they could avoid doing them they
15 probably would, but the fact of the matter is we do them
16 because we have to because the victims need someone to
17 stand up and represent them. The fact that it's
18 undesirable is no reflection at all on how they perform
19 their duty. They do them to 100 per cent to their ability,
20 or I believe most of them do at any rate.

21
22 Q. You go on to say --

23 A. May I just further add to that?

24
25 Q. Please --

26 A. No, I'm not finished yet. May I further add to that,
27 that you may be the most enthusiastic person in the world
28 and absolutely make an abysmal job of an investigation.
29 Enthusiasm is only one of the many, many, many aspects that
30 make up a good investigation. I mean, even you alluded to
31 the fact of experience. I could probably get an A-lister
32 straight out of the academy and give them a job, this
33 particular job, and they'd have been enthusiastic with it,
34 but I don't necessarily think that they would have produced
35 the brief of evidence that Detective Sergeant Little did
36 with his experience. So enthusiasm, I'm quite happy to
37 acknowledge that that is one of the areas that make up a
38 good investigation but it is not the only one.

39
40 Q. You go on to say:

41
42 *Given the problematic nature of historic*
43 *sexual assault investigations involving the*
44 *Catholic Church, there is a better than*
45 *average chance the investigation will*
46 *attract adverse comments from the media.*

47

1 A. Yes.
2
3 Q. That was at the time the primary concern in the
4 Newcastle LAC, wasn't it, avoiding adverse comments from
5 the media?
6 A. No.
7
8 Q. That's a principal issue you're identifying for the
9 consideration of Assistant Commissioner York, isn't it?
10 A. No.
11
12 Q. No? Then why did you say it?
13 A. Well, detective - the then, sorry, Acting Commander
14 Humphrey requested I make a file note. I didn't know what
15 he was going to do with it. That's a file note to
16 Acting Commander Humphrey. It has nothing to do with
17 Assistant Commissioner York, which is what you asked me.
18
19 Q. You knew it was going to Assistant Commissioner York?
20 A. No, I did not.
21
22 MS LONERGAN: Commissioner, I apprehend there may be a
23 confusion about documents here. This was appended to a
24 report that ultimately went to Ma'am York at the end of
25 2012, but there's no evidence in the investigator's note
26 that it was in fact intended for Ma'am York.
27
28 THE COMMISSIONER: Yes, quite so, Ms Lonergan.
29
30 MR COHEN: Q. But it was intended for the record,
31 wasn't it?
32 A. I was asked to make a record of it, so I would presume
33 it was intended for the record.
34
35 Q. It is entirely likely that senior officers in the
36 command would see what you're expressing as your opinion?
37 A. Absolutely - and the senior officer in the command
38 did.
39
40 Q. The issue that you're identifying is the one that was
41 of principal concern to the command, wasn't it, avoiding
42 further media scrutiny?
43 A. I think I - actually, I think I indicate a number of
44 issues within that --
45
46 Q. I'm not suggesting otherwise. My question was the
47 principal concern in the command was avoiding media

1 scrutiny, wasn't it?

2

3 MS LONERGAN: Commissioner, that is the third time that
4 proposition has been put. Mr Cohen is making noises and
5 saying, "Oh, please", but the reality is this witness
6 doesn't need to be asked the same question over and over
7 and over again.

8

9 THE COMMISSIONER: Yes.

10

11 Q. Mr Parker, I think that's not the first of the issues
12 that you address as concerns in that paragraph, is it?

13 A. No.

14

15 THE COMMISSIONER: All right. Thank you.

16

17 MR COHEN: My question, Commissioner, was that it was the
18 principal one and I asked that question once.

19

20 THE COMMISSIONER: Q. Is that the case, Mr Parker? Let's
21 put it to bed now.

22 A. I wouldn't like to point to any particular - as to
23 what was Acting Commander Humphrey's principal issue, if
24 I was to ask what my principal issue was in relation to
25 this, certainly, as the person that had managerial carriage
26 over Strike Force Lantle, my primary issue with this was
27 who was leaking information and what they were leaking.
28 You know, there's an obvious inference, that if certain
29 things are getting out then the question would be - and it
30 later proved correct - what other information that
31 shouldn't have been getting out was getting out?

32

33 MR COHEN: Commissioner, I think I've got to the point
34 where I would ordinarily go on to annexures H and I.

35

36 THE COMMISSIONER: Yes, I understand.

37

38 MR COHEN: On that footing, might I indicate that I have
39 not concluded my cross-examination. Might I reserve it to
40 the appropriate time?

41

42 THE COMMISSIONER: Of course; I understand; thank you.

43

44 MR COHEN: I am indebted to you, Commissioner.

45

46 MS LONERGAN: I think before Mr Saidi, or whoever is going
47 next, questions this witness, there's a matter that's been

1 drawn to my attention by Ms Sullivan that I should have
2 asked some questions of Detective Inspector Parker. With
3 leave, may I deal with that subject matter?
4

5 THE COMMISSIONER: Of course.
6

7 <EXAMINATION BY MS LONERGAN:
8

9 MS LONERGAN: Q. At page 393 of your statement - can you
10 just close up that volume of material that you have in
11 front of you and go back to your statement.

12 A. That will make life a bit easier.
13

14 Q. That one in front of you, Detective Inspector Parker,
15 to your left, there's a clipped version of the statement:
16 they are all together.

17 A. Yes.
18

19 Q. We might work with that one, if it's all right.

20 A. Yes.
21

22 Q. That's not the complete one. Could you turn to
23 page 393, please?

24 A. Yes.
25

26 Q. Do you see that's a newspaper article from the
27 Newcastle Herald?

28 A. Yes.
29

30 Q. Do you see in the far right column there's a bullet
31 point and a comment regarding the transfer of the McAlinden
32 case between police commands? Do you see that?

33 A. Yes.
34

35 Q. And a comment about the officer now managing the case.
36 Then under that there's the paragraph I want to ask you
37 about. It is the result of an interview with you; is that
38 right?

39 A. Yes.
40

41 Q. And it correctly and accurately reports what you said
42 to Ms McCarthy?

43 A. Yes.
44

45 Q. What it says is that you'd made a concession that
46 there had been problems, but you said the matter will be
47 fully investigated and any matters of criminality arising

1 will be prosecuted. Do you see that?
2 A. Yes.
3
4 Q. "I will use whatever resources I need"?
5 A. Yes. My recollection of the conversation is that that
6 didn't immediately follow, but yes.
7
8 Q. Those two comments?
9 A. They were two comments, absolutely.
10
11 Q. You made both those comments?
12 A. Yes.
13
14 Q. That was against the background of the matter taking a
15 slow course because members from the initial strike force
16 took stress and sick leave in December 2010. I just want
17 you to look at the paragraph above the one you've just
18 read.
19 A. The transfer part? That bit?
20
21 Q. Yes, just that paragraph.
22 A. Yes. (Witness reads document). Yes.
23
24 Q. Does that correctly reflect why the matter had a bit
25 of a slow start?
26 A. I'd have to say yes. It is not an ideal situation
27 when you lose basically your entire investigative team.
28
29 Q. You were content to concede to Ms McCarthy that the
30 matter had had problems?
31 A. Well, that's patently obvious, I would have thought.
32
33 MS LONERGAN: Thank you, Commissioner.
34
35 THE COMMISSIONER: Thank you, Ms Lonergan. Mr Irving?
36
37 **<EXAMINATION BY MR IRVING:**
38
39 MR IRVING: Q. Detective Inspector Parker, this was a
40 slightly unusual matter that came from a journalist, in the
41 first instance?
42 A. Yes, that's right.
43
44 Q. And that journalist had significant contacts with a
45 significant number of your witnesses?
46 A. Yes.
47

1 Q. And that's quite unusual?
2 A. Yes.
3
4 Q. You would concede that Ms McCarthy also had
5 significant contacts with persons within the Roman Catholic
6 Church?
7 A. Yes.
8
9 Q. And so she had a great number of sources of
10 information?
11 A. Yes.
12
13 Q. Could I take you to your investigator's note when she
14 rang you on 8 April. If I could put a gloss on it, it is
15 fairly clear in that conversation that she was providing
16 you with information?
17 A. Yes.
18
19 Q. You may have known some of it, but she was giving you
20 the lay of the land as she saw it?
21 A. Yes.
22
23 Q. And then subsequent to that conversation, you've given
24 evidence she provided you with an email in July?
25 A. Yes.
26
27 Q. I won't go into the content of it, but it was of
28 assistance; is that correct?
29 A. Sorry?
30
31 Q. It was of assistance?
32 A. Yes.
33
34 Q. The information flow was not from the police to
35 Ms McCarthy; it was from Ms McCarthy to the police?
36 A. When I took over the investigation, yes.
37
38 Q. Could I take you to the second paragraph of your
39 investigator's note.
40 A. Hang on, I'm not sure that I have it any more.
41
42 Q. Page 524, tab 111.
43 A. Could I have access to the - is that where it is?
44
45 Q. Yes, it would be. It is volume 2, my apologies.
46 A. I don't think it's in my statement, that's all.
47 Is it?

1
2 MS LONERGAN: It is the same investigator's note,
3 I believe, attached to the witness's statement at page 395.
4
5 THE COMMISSIONER: Yes. Thank you.
6
7 MR IRVING: Q. You would agree that in that conversation
8 Ms McCarthy said to you, "I'm going to publish an article"?
9 A. Yes.
10
11 Q. She subsequently did and you've been taken to that
12 article?
13 A. Yes.
14
15 Q. In respect of the supply of material to you in July,
16 she didn't publish anything in respect of either the
17 material or the fact that she'd even given it to you, had
18 she?
19 A. No.
20
21 Q. In fact, after April of 2011, would you agree that
22 she, in fact, didn't publish anything about Lantle at all?
23 I might rephrase that. She didn't publish anything
24 critical of Lantle?
25 A. Yes, I think that's probably correct.
26
27 Q. I'll just take you to the second paragraph of your
28 investigator's note in light of those circumstances.
29 Starting on the second line, "In an attempt", to the end of
30 the sentence, that's an inference that you've drawn --
31 A. Yes.
32
33 Q. -- from that conversation?
34 A. Yes.
35
36 Q. Would you now concede, in light of your actual
37 dealings over 2011, that that inference was incorrect?
38 A. No. Probably the best way I can put it for you is,
39 look, Ms McCarthy - Ms McCarthy was - I don't really know
40 how to term it - possibly conflicted in this; that's my
41 opinion. She - her motives to me were very transparent and
42 very honourable.
43
44 Q. Thank you.
45 A. But she was also servicing her occupation as well, so
46 I was always very careful what I said to Ms McCarthy.
47 She's a very good journalist and I was very careful in my

1 dealings with her. However, yes, I think - the impression
2 I got when I dealt with her was that she was more than
3 happy to deal with me in the way I wanted to deal with her,
4 but she always was also happy to have a little bit of a
5 poke and see whether I would give her any more than I was
6 prepare to. Does that sort of balance --

7
8 Q. She was doing her job?

9 A. Absolutely.

10
11 Q. Thank you. Detective inspector, did the thought ever
12 occur to anyone associated with you in Lantle or the
13 police, if there was a perception that the reporting might
14 have been causing problems, to request that certain issues
15 not be reported?

16 A. After I took over, you're pretty right, we didn't have
17 too many more problems with her doing that, so I wouldn't
18 comment. You'd have to speak to one of the ones that had -
19 prior to me, because that's where the errors, the issues
20 occurred.

21
22 Q. Prior to your taking over Lantle?

23 A. Yes.

24
25 Q. There are a few matters I would take you to from your
26 investigator's note. Ms McCarthy is quite adamant she
27 would not use the words "drop a bucket". Is use of that
28 term a paraphrase by you of the general sentiment of what
29 she was going to publish?

30 A. Where is that?

31
32 Q. If it is of any assistance --

33 A. I recall it being in there. I just can't see it right
34 at the moment.

35
36 Q. Yes. It is 396 in your statement at paragraph --

37 A. 396. Paragraph?

38
39 MS LONERGAN: It is the last paragraph.

40
41 THE WITNESS: 396?

42
43 MR IRVING: That's what I'm told. I'm working on it --

44
45 THE COMMISSIONER: Yes, in the last paragraph.

46
47 THE WITNESS: Yes. I haven't put it - and you'll notice

1 I've put some things in brackets, or in inverted commas.
2 It may have been a paraphrase.

3

4 Q. It may have been a paraphrase?

5 A. Yes. I wouldn't say it definitely was because
6 Ms McCarthy can be fairly colourful when she like to be as
7 well, but I wouldn't dispute that it is colourful.

8

9 Q. Can I say I've noticed that too, detective inspector.
10 The other comment I would make, she instructs me that she
11 didn't make a comment critical of any of the officers on
12 the original Lantle. On my instruction, the comments made
13 about the officers from the original Lantle was made by
14 Mr Morrison and she stated to you that Mr Morrison said two
15 of those officers would be no good at all. Now, if you're
16 looking - it is at the top of the second page.

17 A. Yes. (Witness reads document). I was about to
18 concede that but I notice that I have put both her
19 barrister and her, so I'd have to - I'd have to go with
20 what I've put there, I'm sorry, yes.

21

22 Q. That's all right. There is a suggestion in the
23 investigator's note that she advanced the proposition that
24 [AL] was her friend. You're going to ask me where it is,
25 aren't you?

26 A. Yes, I am.

27

28 Q. Could I take you to the third page of the
29 investigator's note, the third paragraph down.

30 A. The third paragraph down. Yes.

31

32 Q. You may have been in court when Ms McCarthy gave
33 evidence about what we might call a relationship she has
34 with people and I think she described them as significant
35 relationships but not necessarily friendships. Would you
36 accept that that was the thrust of what she was saying?

37 A. I'd put that particular word in inverted commas, but
38 I would suggest to you that she said that at some point.
39 What her relationship with [AL] I couldn't comment. You
40 know, I don't know, to be honest.

41

42 MR IRVING: Thank you, Commissioner. .

43

44 THE COMMISSIONER: Thank you, Mr Irving. Mr Gyles, do you
45 have any questions?

46

47 MR GYLES: I don't, thank you, Commissioner.

1
2 MR ROSER: I have no questions.
3
4 MS LONERGAN: I have no questions.
5
6 THE COMMISSIONER: Thank you for your evidence, Detective
7 Inspector Parker. You're excused. Thank you.
8
9 <THE WITNESS WITHDREW
10
11 MS LONERGAN: Commissioner, it has been suggested that we
12 call the next witness. It would be Inspector Dunn and
13 Mr Kell will be taking the inspector's evidence.
14
15 <FAY DUNN, sworn: [4.00pm]
16
17 <EXAMINATION BY MR KELL:
18
19 MR KELL: Q. Would you please state your full name?
20 A. My name is Fay Dunn.
21
22 Q. You're an inspector of the NSW Police Force?
23 A. Correct.
24
25 Q. And you're presently attached to the Education and
26 Training Command?
27 A. Correct.
28
29 Q. And that's located at Windsor in Sydney?
30 A. Yes, at Richmond.
31
32 MR SAIDI: Commissioner, could it be noted that I seek the
33 same --
34
35 THE COMMISSIONER: Thank you, Mr Saidi, that's understood.
36
37 MR KELL: Q. You have prepared a statement to the
38 inquiry, with the assistance of your legal advisers, dated
39 20 June 2010?
40 A. I did.
41
42 Q. I am sorry, 2013. I'd just hand you a copy of the
43 statement and a copy for the Commissioner. Is that your
44 signature on page 5?
45 A. It is.
46
47 Q. Are the contents of that statement true and correct?

1 A. Yes.

2

3 MR KELL: Commissioner, I tender that document.

4

5 THE COMMISSIONER: Thank you, Mr Kell. The statement of
6 Inspector Dunn of 20 June 2013 will be admitted and marked
7 exhibit 41.

8

9 **EXHIBIT #41 STATEMENT OF INSPECTOR FAY DUNN DATED 20/6/2013**

10

11 MR KELL: Q. Inspector, you were attested as a police
12 officer in 1980?

13 A. Yes.

14

15 Q. And then in 1999 you were promoted to the rank of
16 sergeant?

17 A. That's correct.

18

19 Q. At some point you joined the Forensic Services Group?

20 A. Yes.

21

22 Q. That is the division of police that deals with crime
23 scene examinations, among other things?

24 A. Yes, that's right.

25

26 Q. When did you join that division?

27 A. 2004.

28

29 Q. In 2007 you were promoted to the rank of inspector?

30 A. Yes.

31

32 Q. And that was while you were attached to the FSG?

33 A. That's correct.

34

35 Q. And at FSG your initial duties were those of a
36 training officer and you subsequently became a staff
37 officer.

38 A. That's correct.

39

40 Q. You became the staff officer to Assistant Commissioner
41 Carlene York when she headed up the FSG; is that correct?

42 A. Yes, I did.

43

44 Q. In about February 2010 Assistant Commissioner York
45 moved from the FSG to become region commander for the
46 northern region?

47 A. I don't recall the exact date but

1 Assistant Commissioner York took up the position.
2 I started there in February 2010. It could well have been
3 the same time.
4

5 Q. You moved across from the FSG to become staff officer
6 to Assistant Commissioner Carlene York when she was in the
7 northern region command?

8 A. That's correct.
9

10 Q. You held that position as staff officer up until about
11 December 2011 is that correct?

12 A. Yes, December 2011 I went on leave and I didn't return
13 to that job after the end of the leave.
14

15 Q. And at that point in time you transferred to your
16 present position?

17 A. Yes.
18

19 Q. I wonder if you can indicate in brief terms what are
20 some of the principal duties as staff officer to the
21 assistant commissioner when you were based in the northern
22 region command?

23 A. Yes. As an assistant assisting managing her diary,
24 her commitments, for meetings with various people; to
25 obtain information that she would need for any particular
26 issue which may arise; to act as a liaison in relation to
27 her and her direct reports, to provide information to the
28 assistant commissioner from them if they weren't speaking
29 with her directly; to manage her correspondence, or to
30 oversight her correspondence is probably a better way to
31 say it; and if she were or anyone in that role was not in
32 the office at the time and I was there, to provide a
33 customer service response for people who may call the
34 office.
35

36 Q. Is it fair to say that you were a link in many
37 instances between the assistant commissioner and local area
38 command?

39 A. "A link" did you say?
40

41 Q. Yes.

42 A. Yes.
43

44 Q. A conduit, if you like?

45 A. Yes.
46

47 Q. And that you would make requests to local area

1 commands on behalf of the assistant commissioner?
2 A. Yes. Yes.
3
4 Q. And you would obtain information and documents from
5 local area commands to enable you to be in a position to
6 report and assist with briefing reports to the
7 assistant commissioner?
8 A. It would be the briefing report I obtained. The
9 briefing report would come from a command and then I would
10 provide it to the assistant commissioner.
11
12 Q. Was part of your role also from time to time dealing
13 with requests from the media for information from the
14 assistant commissioner?
15 A. Yes. What I would do is often I would receive the
16 request and then convey that request to the assistant
17 commissioner.
18
19 Q. Thank you. In your statement from about paragraph 17
20 onwards, you refer to having contact with
21 Joanne McCarthy --
22 A. Yes.
23
24 Q. -- in 2010. She's a senior journalist at the
25 Newcastle Herald?
26 A. Yes. Regretfully, I don't remember exactly when that
27 was, but I did have a telephone conversation with
28 Ms McCarthy.
29
30 Q. You indicate that that was on at least one occasion?
31 A. Yes.
32
33 Q. It is possible, is it, that you had further
34 discussions with Ms McCarthy?
35 A. I don't recall any more. I certainly recall one
36 conversation. I don't recall any more.
37
38 Q. In terms of the timing of that conversation that you
39 recall, are you able to assist as to when that was?
40 A. I have no independent record of it, but I think it was
41 in October 2010.
42
43 Q. Could I ask you to turn to annexure D of your
44 statement.
45 A. Yes.
46
47 Q. Is that an email that you've received attaching a

1 situation report?
2 A. Yes, it is.
3
4 Q. Does that assist you as to the timing of the
5 conversation that you recall having had with Ms McCarthy?
6 A. I would expect, looking at the document there, that
7 I had a conversation with Ms McCarthy and then requested
8 information on behalf of the region commander from
9 Newcastle Local Area Command.
10
11 Q. The document itself, the email and the attached
12 situation report are dated 12 October 2010. Do you see
13 that?
14 A. Yes.
15
16 Q. Based on the date of that document, are you able to
17 indicate as to whether it was on that day or some earlier
18 day perhaps, in terms of timing, when you would have had
19 the discussion with Joanne McCarthy?
20 A. My expectation is it would have been that day.
21
22 Q. It would have been the same day?
23 A. That's my expectation.
24
25 Q. Do you recall any of the terms or substance of that
26 conversation?
27 A. From my recollection, Ms McCarthy was intending to
28 publish an article in the paper within the next few days in
29 relation to allegations of Catholic Church involvement in
30 I think it was child abuse. I actually don't recall
31 whether it was child abuse, it was some sort of abuse, and
32 she was requesting a comment in relation to that from the
33 region commander.
34
35 Q. As a consequence of that inquiry being made to you, to
36 your knowledge were steps taken by the region office to
37 obtain or request a situation report?
38 A. Yes. My normal - what I would normally do in that
39 situation is contact the local area command and ask them
40 for information to provide to the region commander.
41
42 Q. Would you just have a look on the bottom paragraph of
43 that situation report that was sent to you. Do you see
44 there's a reference under the heading "Further/Proposed
45 Action"?
46 A. Yes.
47

1 Q. And you'll see the first sentence says:
2
3 *Other relevant documentation is being*
4 *collected from other Commands in respect of*
5 *this matter.*
6
7 A. Yes.
8
9 Q. Do you have any recollection now about whether you
10 were aware then as to what steps were being taken to obtain
11 documentation to assist with the situation report that was
12 being provided to you?
13 A. No, I'm not aware of any.
14
15 Q. Could I just ask you to have a look at paragraph 31 of
16 your statement. You've got a heading there, "Search of the
17 office of Detective Chief Inspector Peter Fox"?
18 A. Yes.
19
20 Q. You indicate under that that you've got no
21 recollection one way or the other of being involved in the
22 search of DCI Fox's office during October 2010?
23 A. I certainly had no involvement in any search.
24
25 Q. In saying you had no involvement in any search, you're
26 indicating that you no physical involvement in attending
27 the premises?
28 A. Correct.
29
30 Q. I just want to ask you this, whether the search of the
31 office of a police officer for documents while he's on
32 leave, whether or not that's a matter that you would be
33 able to authorise personally in your position as a
34 staff officer?
35 A. No, I had no authority to do that.
36
37 Q. Is that a matter that could be authorised by the
38 assistant commissioner?
39 A. I would expect so, yes.
40
41 Q. Do you recall on any occasions relaying a request to
42 any officer at the Newcastle Local Area Command that a
43 search be undertaken --
44 A. No.
45
46 Q. -- of Detective Chief Inspector Fox's office?
47 A. No, I have no recollection of that at all.

1
2 Q. When you say you've got no recollection, have you got
3 any recollection of having done it in any circumstances for
4 any particular police officer?
5 A. No, no, none at all.
6
7 Q. Is that a matter that would be particularly unusual?
8 A. It would be unusual, yes, in my position, yes.
9
10 Q. And striking?
11 A. Yes. For me to say that?
12
13 Q. Yes.
14 A. Yes. I have no authority to indicate - to suggest a
15 search.
16
17 Q. Putting to one side the question of authority, in
18 terms of you relaying to an officer from the local area
19 command that a search should be undertaken of an officer's
20 room, again, with authority from the assistant
21 commissioner, is that something that would be particularly
22 unusual?
23 A. Extremely unusual.
24
25 Q. Do you recall it ever having occurred in your time as
26 a staff officer?
27 A. No, I don't recall any instance.
28
29 Q. And you're fairly confident that that's something you
30 would recall had it occurred?
31 A. If I had conveyed that message?
32
33 Q. Yes.
34 A. Yes.
35
36 Q. Thank you. You indicate in those paragraphs that
37 you're unable to say, based on your current recollection,
38 one way or the another, as to whether you had any
39 conversations with Acting Commander Wayne Humphrey in
40 relation to the matter. This is in paragraph 31.
41 A. Is this referring to - yes.
42
43 Q. Yes.
44 A. Yes.
45
46 Q. By that are you indicating that you've got no
47 recollection now one way or another of speaking with

1 Acting Commander Wayne Humphrey in relation to the topic of
2 whether there are any documents to be obtained from DCI Fox
3 at all?

4 A. I have no recollection of that.

5

6 Q. Putting to one side the reference to any searching of
7 an office, is it conceivable that you had a discussion with
8 Acting Commander Humphrey in relation to the topic of
9 obtaining a file or documents from DCI Fox?

10 A. It is entirely possible he may have mentioned it.

11

12 Q. Thank you, inspector.

13 A. Thank you.

14

15 THE COMMISSIONER: Mr Cohen?

16

17 <EXAMINATION BY MR COHEN:

18

19 MR COHEN: Q. Inspector Dunn, the issue of the file that
20 has been mentioned in evidence, the request, you didn't
21 grant it; is that your evidence?

22 A. Sorry, the file that's referred to in the sit-rep?

23

24 Q. Yes.

25 A. I'm sorry, could you ask that question again?

26

27 Q. The file that was sought from you and suggested by
28 Acting Superintendent Humphrey was not raised by you; is
29 that so?

30 A. Correct.

31

32 Q. And that was a matter that would be something in these
33 circumstances that you'd recall had you raised it?

34 A. I'd expect I would have, yes. I had no - my request
35 to the acting commander at the time was to get information
36 to provide to the region commander. What information that
37 entailed would really be at the discretion of the
38 commander.

39

40 Q. If it had involved searching for a ministerial file
41 under a so-called green, you would have recalled that,
42 I take it?

43 A. I'm sorry, Mr Cohen?

44

45 Q. If the request had involved seeking out a ministerial
46 file under a so-called green, I take it you would recall it
47 if it occurred that way?

1 A. If I requested it?
2
3 Q. Yes.
4 A. I'm not quite sure I understand what you're after.
5
6 Q. You didn't seek a ministerial file under a green?
7 A. No. No. I think it's called a pink.
8
9 Q. I beg your pardon, I'm so sorry, I do apologise. I'm
10 sure the colour coding is very clear if you're on the
11 inside of the police force. I apologise if I've got it
12 wrong.
13 A. Yes.
14
15 Q. You also gave evidence about the unusual circumstances
16 of a search in the context of your evidence a few minutes
17 ago and I think the word you adopted from my learned friend
18 was that it was a situation that was striking; is that
19 right? Did I understand your evidence correctly?
20 A. What was the question?
21
22 Q. The circumstances in which there was to be a search of
23 an office was so unusual as to be striking. Was that your
24 evidence?
25 A. Not the search of the office; my request to search an
26 office.
27
28 Q. I see - and something that you had never ever done?
29 A. I don't ever recall requesting anyone to search an
30 office.
31
32 Q. Certainly not on this occasion?
33 A. I don't recall it, no.
34
35 MR COHEN: Thank you, Commissioner.
36
37 THE COMMISSIONER: Thank you very much, Mr Cohen.
38 Mr Irving?
39
40 MR IRVING: No, thank you, Commissioner.
41
42 THE COMMISSIONER: Mr Saidi?
43
44 MR SAIDI: I just want to find a passage, if I may,
45 Commissioner.
46
47 [Transcript suppressed from page 1570, line 47, to

1 page 1571 line 11]
2
3
4
5
6
7
8
9
10
11
12

13 **<EXAMINATION BY MR SAIDI:**

14
15 MR SAIDI: Q. Do you have your statement there in front
16 of you?

17 A. I do, Mr Saidi.
18

19 Q. Would you go to annexure C, if you don't mind?

20 A. Yes.
21

22 Q. Do you see that that refers to an email from
23 Wayne Humphrey to, amongst other people, yourself?

24 A. I was a cc, yes.
25

26 Q. Could I take you to the second paragraph commencing,
27 "Detective Chief Inspector Fox has initiated"?

28 A. Yes.
29

30 Q. Do you see reference there to the file that originated
31 at State Crime Command was sent to Central Hunter and then
32 ultimately to DCI Fox?

33 A. Yes.
34

35 Q. The next sentence is what I want you to pay attention
36 to:
37

38 *That file and any associated documentation*
39 *should be collected and hand delivered to*
40 *Detective A/Inspector Quinn, Crime Manager*
41 *Newcastle City LAC as soon as possible.*
42

43 Do you see that?

44 A. I do.
45

46 Q. That email refers to various dates, specifically
47 13 October 2010?

1 A. Yes.
2
3 Q. Do you have any independent recollection one way or
4 the other of having received that email from Mr Humphrey?
5 A. I don't have any independent recollection of it.
6 I have a copy of that - I had a copy of that in my records.
7
8 Q. I take it from that that you've got no independent
9 recollection of having discussed the issue of the
10 collection of a file with Mr Humphrey?
11 A. That's correct, Mr Saidi.
12
13 Q. Or indeed you have no recollection of having discussed
14 that file being collected with anyone else, that is, any
15 independent recollection; correct?
16 A. Correct.
17
18 Q. By having no independent recollection, so it be clear,
19 you have no recollection one way or the other whether you
20 discussed the collection of a file with Mr Humphrey or
21 anyone else at that time?
22 A. That's correct.
23
24 MR SAIDI: Thank you.
25
26 THE COMMISSIONER: Thank you, Mr Saidi. Is there anything
27 arising, Mr Kell?
28
29 MR KELL: No, Commissioner.
30
31 THE COMMISSIONER: Thank you.
32
33 Q. Inspector, thank you very much for your evidence. You
34 are excused.
35 A. Thanks very much.
36
37 **<THE WITNESS WITHDREW**
38
39 MR KELL: Thank you, Commissioner. We ask that you
40 adjourn and we ask that we're able to resume at nine in the
41 morning.
42
43 THE COMMISSIONER: Yes, we will resume at nine in the
44 morning. Thank you.
45
46 **AT 4.20PM THE COMMISSION WAS ADJOURNED TO**
47 **FRIDAY, 28 JUNE 2013 AT 9AM**

#

#40 [1] - 1499:13
#41 [1] - 1563:9

1

'85 [1] - 1451:25
'99 [1] - 1451:25
'getting [1] - 1469:9

1 [8] - 1446:26,
1453:14, 1458:40,
1459:26, 1459:31,
1473:24, 1489:19,
1523:31
10 [5] - 1459:31,
1459:35, 1475:3,
1516:41, 1535:37
100 [7] - 1463:46,
1466:8, 1502:23,
1544:9, 1551:45,
1552:31, 1553:19
101 [1] - 1484:45
11 [5] - 1493:43,
1494:14, 1494:21,
1571:1
111 [4] - 1484:22,
1484:28, 1494:19,
1558:42
12 [15] - 1451:29,
1462:34, 1462:40,
1465:1, 1484:32,
1486:17, 1487:39,
1488:1, 1488:5,
1488:10, 1501:46,
1504:44, 1522:31,
1522:34, 1566:12
12.25 [1] - 1505:15
12.40pm [1] - 1498:22
13 [6] - 1458:32,
1458:39, 1459:26,
1460:21, 1537:40,
1571:47
13th [1] - 1538:31
14 [9] - 1446:31,
1479:27, 1480:5,
1522:34, 1522:42,
1524:46, 1527:7,
1551:8, 1551:24
1453 [1] - 1453:17
1455 [1] - 1453:18
1460 [1] - 1460:20
1461 [1] - 1460:21
1473 [1] - 1473:23
1474 [1] - 1473:24

1475 [1] - 1475:2
1477 [1] - 1475:2
15 [5] - 1508:14,
1508:17, 1518:15,
1532:39, 1535:34
1518 [1] - 1518:15
1520 [2] - 1518:16,
1520:46
1522 [1] - 1520:47
1570 [1] - 1570:47
1571 [1] - 1571:1
16 [3] - 1489:20,
1491:18, 1529:1
168 [2] - 1492:19,
1493:29
17 [5] - 1447:3,
1450:5, 1453:17,
1489:20, 1565:19
18 [2] - 1472:20,
1512:6
19 [9] - 1450:25,
1451:11, 1478:36,
1479:1, 1479:17,
1489:19, 1529:1,
1529:6, 1541:1
1980 [1] - 1563:12
1987 [1] - 1499:17
1992 [1] - 1499:21
1994 [1] - 1499:31
1996 [1] - 1499:42
1998 [1] - 1499:45
1999 [3] - 1452:25,
1452:33, 1563:15

2

2 [29] - 1463:32,
1467:13, 1475:2,
1477:26, 1493:44,
1497:18, 1501:43,
1502:1, 1502:25,
1502:30, 1502:43,
1504:1, 1507:45,
1508:47, 1509:13,
1513:26, 1515:31,
1515:35, 1516:33,
1523:1, 1524:8,
1525:28, 1527:30,
1529:22, 1537:7,
1537:24, 1541:26,
1542:15, 1558:45
20 [8] - 1459:35,
1459:39, 1459:47,
1460:3, 1460:20,
1501:46, 1562:39,
1563:6
20/6/2013 [1] - 1563:9
2000 [2] - 1500:2,
1500:4

2002 [1] - 1500:25
2004 [1] - 1563:27
2006 [1] - 1500:30
2007 [4] - 1494:44,
1494:45, 1495:15,
1563:29
2008 [1] - 1500:33
2010 [72] - 1451:29,
1455:8, 1455:16,
1458:21, 1458:25,
1458:32, 1458:40,
1459:17, 1459:26,
1459:27, 1459:39,
1460:16, 1461:36,
1466:38, 1467:44,
1468:8, 1470:6,
1472:20, 1474:4,
1474:8, 1477:14,
1477:26, 1481:18,
1483:16, 1485:31,
1485:47, 1486:45,
1489:7, 1489:18,
1489:19, 1495:1,
1495:7, 1495:11,
1495:15, 1495:46,
1497:18, 1501:43,
1502:1, 1502:25,
1504:1, 1507:45,
1509:16, 1512:6,
1513:23, 1513:26,
1514:47, 1515:10,
1515:13, 1515:28,
1516:14, 1516:22,
1523:26, 1523:31,
1525:27, 1527:3,
1529:22, 1541:26,
1542:15, 1549:43,
1557:16, 1562:39,
1563:44, 1564:2,
1565:24, 1565:41,
1566:12, 1567:22,
1571:47
2010/133845 [1] -
1464:31
2011 [33] - 1459:17,
1460:8, 1477:17,
1477:21, 1478:37,
1481:4, 1481:33,
1484:20, 1487:12,
1490:29, 1493:33,
1493:37, 1502:16,
1509:13, 1509:22,
1510:30, 1510:47,
1511:6, 1511:10,
1511:22, 1511:30,
1511:46, 1523:10,
1536:34, 1536:39,
1537:18, 1537:46,
1539:44, 1547:9,
1559:21, 1559:37,

1564:11, 1564:12
2012 [11] - 1510:26,
1510:30, 1510:31,
1511:29, 1511:30,
1513:33, 1513:35,
1517:30, 1540:9,
1541:1, 1554:25
2013 [5] - 1446:30,
1466:38, 1562:42,
1563:6, 1572:47
21 [5] - 1478:37,
1478:38, 1478:44,
1479:7, 1509:22
21(d) [2] - 1466:28,
1467:8
21(d) [1] - 1465:43
21st [1] - 1479:15
22 [2] - 1474:19,
1520:47
23 [4] - 1473:23,
1495:7, 1495:11,
1495:15
23(3) [1] - 1498:18
25 [4] - 1459:45,
1513:23, 1514:47,
1515:10
27 [5] - 1446:30,
1494:45, 1495:14,
1524:31, 1526:21
27th [2] - 1526:6,
1526:18
28 [3] - 1489:18,
1509:43, 1572:47
29 [3] - 1458:21,
1460:16, 1489:19
2nd [1] - 1509:19

3

30 [6] - 1458:21,
1458:25, 1489:7,
1489:18, 1489:19,
1523:38
31 [5] - 1458:26,
1536:24, 1536:40,
1567:15, 1568:40
311 [1] - 1548:32
312 [2] - 1522:43,
1527:7
318 [5] - 1504:40,
1529:43, 1530:8,
1530:15, 1532:44
319 [5] - 1505:2,
1530:17, 1532:44,
1533:3, 1534:41
32 [2] - 1536:28,
1537:38
320 [4] - 1533:27,
1533:30, 1533:31,

1534:15
323 [1] - 1506:12
324 [1] - 1514:4
328 [1] - 1517:13
329 [1] - 1517:38
334 [1] - 1545:42
334-335 [2] - 1545:40,
1545:43
335 [1] - 1546:3
339 [1] - 1512:29
341 [4] - 1540:37,
1540:44, 1541:11,
1543:41
345 [1] - 1548:32
355 [1] - 1494:34
361 [1] - 1512:5
366 [1] - 1496:15
371 [10] - 1503:21,
1547:36, 1548:10,
1548:12, 1548:15,
1548:37, 1548:42,
1549:6, 1549:20,
1550:16
372 [2] - 1548:34,
1549:6
376 [4] - 1548:10,
1549:6, 1549:8,
1550:16
393 [2] - 1556:9,
1556:23
395 [1] - 1559:3
396 [3] - 1560:36,
1560:37, 1560:41

4

4.00pm [1] - 1562:15
4.20PM [1] - 1572:46
40 [1] - 1499:11
41 [2] - 1518:16,
1563:7
448 [1] - 1551:11
449 [1] - 1552:9
46 [1] - 1520:46
47 [1] - 1570:47
491 [2] - 1494:17,
1494:25

5

5 [1] - 1562:44
524 [1] - 1558:42
528 [3] - 1484:22,
1484:28, 1484:29
5th [1] - 1545:37

6

6^[1] - 1453:18
62^[2] - 1463:33,
1467:31

7

7^[1] - 1459:17
7/3/2013^[1] - 1499:14

8

8^[9] - 1489:19,
1524:19, 1525:1,
1525:15, 1525:21,
1525:22, 1525:44,
1526:21, 1558:14
81^[4] - 1494:22,
1494:24, 1494:29,
1494:30
8th^[2] - 1526:6,
1526:18

9

9.30am^[1] - 1446:29
9.45am^[1] - 1446:30
98^[2] - 1524:9, 1551:4
9AM^[1] - 1572:47

A

A-lister^[1] - 1553:31
A/Inspector^[1] -
1571:40
abhorrent^[1] -
1553:13
ability^[3] - 1448:27,
1457:35, 1553:19
able^[24] - 1455:35,
1480:46, 1491:5,
1492:23, 1493:11,
1501:18, 1501:21,
1502:42, 1503:4,
1505:14, 1505:39,
1510:24, 1511:28,
1511:30, 1511:45,
1512:10, 1513:15,
1513:42, 1516:20,
1526:14, 1565:39,
1566:16, 1567:33,
1572:40
abreast^[1] - 1502:9
abroad^[1] - 1455:33
absence^[6] - 1533:11,
1541:16, 1541:24,
1543:43, 1544:42,
1545:9
absent^[1] - 1468:41
absolutely^[30] -
1453:8, 1468:42,
1470:2, 1471:24,
1471:44, 1485:22,
1489:33, 1501:6,
1501:30, 1503:26,
1508:22, 1513:13,
1515:29, 1516:24,
1518:10, 1522:39,
1524:1, 1526:30,
1528:18, 1532:26,
1537:22, 1546:45,
1547:10, 1549:38,
1552:35, 1553:28,
1554:37, 1557:9,
1560:9
absorb^[1] - 1457:40
abundantly^[1] -
1531:27
abuse^[8] - 1499:25,
1499:33, 1552:24,
1552:26, 1553:10,
1566:30, 1566:31
ABUSE^[1] - 1446:16
abysmal^[2] - 1482:30,
1553:28
abysmally^[1] -
1487:17
academy^[1] - 1553:32
accept^[23] - 1448:18,
1453:5, 1463:41,
1463:46, 1479:34,
1480:1, 1484:32,
1484:39, 1484:41,
1485:21, 1486:44,
1486:47, 1487:10,
1487:13, 1491:37,
1496:22, 1496:34,
1530:24, 1530:29,
1532:5, 1535:23,
1541:14, 1561:36
acceptable^[1] -
1545:17
accepted^[2] -
1448:24, 1487:36
accepts^[1] - 1495:5
access^[4] - 1524:7,
1526:13, 1528:37,
1558:43
acclimatised^[1] -
1524:41
accordingly^[2] -
1484:17, 1526:36
accords^[3] - 1457:47,
1489:25, 1529:28
account^[1] - 1533:17
accuracy^[1] - 1456:2

accurate^[12] -
1456:21, 1471:44,
1478:39, 1505:24,
1517:18, 1530:27,
1530:28, 1530:34,
1530:36, 1530:37,
1530:40, 1534:30
accurately^[2] -
1505:43, 1556:41
accuse^[1] - 1547:13
accusing^[1] -
1547:18
achieved^[4] - 1486:1,
1487:20, 1488:1
acknowledge^[1] -
1553:37
act^[2] - 1539:20,
1564:26
Act^[1] - 1452:13
Acting^[7] - 1554:13,
1554:16, 1555:23,
1568:39, 1569:1,
1569:8, 1569:28
acting^[9] - 1450:34,
1453:6, 1455:46,
1455:47, 1502:1,
1502:31, 1509:15,
1540:26, 1569:35
Action^[1] - 1566:45
action^[2] - 1448:5,
1494:38
active^[6] - 1503:43,
1509:31, 1509:36,
1510:1, 1516:18,
1542:8
activity^[4] - 1461:39,
1486:4, 1486:5,
1486:24
actual^[4] - 1525:6,
1525:29, 1530:47,
1559:36
adamant^[1] - 1560:26
add^[3] - 1496:35,
1553:23, 1553:26
adding^[1] - 1496:36
additional^[1] -
1449:24
address^[3] - 1469:32,
1469:34, 1555:12
addressed^[1] -
1528:11
addressing^[3] -
1500:42, 1543:5,
1549:21
adduced^[1] - 1539:22
adjourn^[1] - 1572:40
ADJOURNED^[1] -
1572:46
adjournment^[4] -
1497:8, 1531:44,
1535:30, 1550:32
ADJOURNMENT^[3] -
1497:12, 1516:45,
1550:36
administration^[2] -
1495:27, 1495:47
administrative^[2] -
1494:38, 1496:1
admission^[1] -
1511:34
admissions^[1] -
1540:16
admitted^[2] -
1499:11, 1563:6
adopted^[4] - 1447:34,
1480:33, 1538:15,
1570:17
advanced^[2] -
1538:34, 1561:23
advantageous^[1] -
1469:15
advantages^[3] -
1501:19, 1501:20,
1501:26
adverse^[2] - 1553:46,
1554:4
adversely^[1] -
1489:43
advice^[1] - 1487:35
advisers^[1] - 1562:38
advocates^[1] -
1490:43
affects^[1] - 1489:43
affidavit^[3] - 1512:5,
1512:25, 1517:31
affix^[1] - 1530:42
affixes^[1] - 1530:41
afraid^[1] - 1468:47
afresh^[2] - 1486:22,
1486:23
ago^[6] - 1534:7,
1544:36, 1544:39,
1545:31, 1546:40,
1570:17
agree^[20] - 1447:35,
1449:5, 1449:8,
1449:15, 1451:1,
1452:28, 1453:11,
1466:30, 1468:25,
1471:29, 1480:24,
1482:17, 1486:3,
1488:38, 1505:10,
1526:29, 1543:15,
1545:3, 1559:7,
1559:21
agreed^[1] - 1453:10
agreement^[2] -
1491:4, 1491:8
agrees^[1] - 1490:34
Aha^[1] - 1481:22

aide^[1] - 1456:33
aide-memoire^[1] -
1456:33
AJ^[1] - 1546:23
AK^[2] - 1486:39,
1546:23
AL^[6] - 1461:40,
1486:6, 1486:39,
1546:23, 1561:24,
1561:39
albeit^[1] - 1525:18
alive^[1] - 1543:24
allegation^[2] -
1452:30, 1485:7
allegations^[1] -
1566:29
ALLEGATIONS^[1] -
1446:16
alleged^[1] - 1497:1
allow^[3] - 1458:19,
1461:16, 1496:31
allowed^[1] - 1457:13
allowing^[2] - 1478:45,
1539:7
alluded^[1] - 1553:30
alludes^[1] - 1543:22
alluding^[1] - 1518:11
almost^[1] - 1551:43
alone^[1] - 1472:11
ambiguity^[1] - 1542:6
ambit^[2] - 1449:7,
1467:35
ambivalent^[1] -
1474:44
amended^[2] -
1447:33, 1449:34
amendments^[3] -
1538:32, 1538:37,
1539:33
amount^[3] - 1474:9,
1509:36, 1516:8
analyst^[1] - 1458:5
analysts^[1] - 1458:6
AND^[1] - 1459:17
animosity^[1] -
1505:34
annexed^[7] -
1450:14, 1468:45,
1503:16, 1504:33,
1513:2, 1514:4,
1535:38
annexing^[1] -
1529:15
annexure^[5] -
1447:4, 1447:40,
1448:30, 1448:33,
1468:46, 1470:31,
1478:36, 1478:45,
1478:46, 1479:8,
1479:16, 1479:23,

1479:30, 1494:6, 1494:8, 1494:9, 1494:14, 1504:34, 1504:36, 1506:5, 1506:12, 1512:4, 1512:24, 1514:2, 1517:11, 1517:31, 1517:34, 1529:27, 1532:17, 1532:24, 1533:23, 1533:31, 1533:46, 1534:7, 1534:8, 1534:14, 1534:18, 1534:29, 1534:39, 1535:7, 1535:18, 1535:38, 1536:12, 1536:16, 1536:18, 1540:38, 1540:41, 1545:40, 1547:35, 1565:43, 1571:19

annexures [4] - 1447:5, 1503:14, 1529:17, 1555:34

answer [32] - 1455:35, 1456:11, 1461:26, 1464:34, 1472:30, 1473:1, 1473:5, 1474:30, 1474:39, 1480:26, 1481:43, 1493:2, 1530:4, 1535:5, 1535:6, 1542:25, 1542:39, 1543:17, 1543:19, 1544:8, 1544:21, 1544:24, 1544:30, 1544:33, 1544:39, 1545:27, 1546:31, 1546:35, 1553:9

answered [7] - 1483:32, 1492:33, 1535:1, 1540:10, 1540:14, 1544:31, 1549:26

answering [2] - 1544:18, 1546:34

answers [5] - 1456:16, 1456:21, 1456:42, 1492:37, 1545:21

antagonistic [1] - 1507:41

anticipated [1] - 1446:42

antithetical [1] - 1471:9

anyway [1] - 1469:28

apart [6] - 1448:37, 1448:38, 1488:5, 1528:25, 1529:14, 1549:6

apologies [2] - 1457:31, 1558:45

apologise [5] - 1460:3, 1535:20, 1548:39, 1570:9, 1570:11

apparent [2] - 1541:13, 1543:43

appear [4] - 1452:23, 1468:47, 1493:11, 1540:19

appeared [5] - 1484:13, 1489:17, 1508:15, 1531:46, 1541:16

appearing [1] - 1489:37

appended [1] - 1554:23

appointed [3] - 1486:2, 1486:29, 1502:17

appointments [1] - 1456:27

appraisal [2] - 1503:8, 1535:9

appreciate [6] - 1450:41, 1490:42, 1492:4, 1514:2, 1516:18, 1516:19

apprehend [1] - 1554:22

apprehended [1] - 1543:10

apprised [1] - 1496:28

approach [13] - 1463:27, 1467:5, 1469:20, 1471:9, 1472:45, 1480:36, 1490:12, 1494:2, 1503:37, 1511:36, 1537:37, 1542:12, 1548:34

approached [1] - 1498:33

approve [1] - 1491:6

appropriate [9] - 1464:11, 1468:43, 1479:27, 1495:44, 1498:34, 1510:8, 1518:8, 1539:36, 1555:40

appropriately [1] - 1496:28

approval [1] - 1485:41

approved [1] - 1450:6

approving [1] - 1450:46

April [56] - 1477:14, 1477:20, 1478:36, 1478:37, 1478:38, 1478:44, 1479:1, 1479:7, 1479:17, 1479:27, 1479:41, 1479:43, 1480:5, 1481:4, 1481:33, 1484:20, 1486:45, 1489:18, 1489:19, 1510:26, 1510:28, 1510:30, 1510:31, 1511:29, 1511:30, 1513:33, 1513:35, 1513:39, 1515:13, 1515:31, 1515:35, 1516:32, 1516:33, 1517:30, 1524:19, 1524:46, 1525:1, 1525:15, 1525:21, 1525:22, 1525:44, 1526:9, 1526:20, 1526:21, 1537:40, 1538:42, 1539:9, 1539:17, 1539:32, 1539:44, 1540:9, 1551:8, 1551:24, 1558:14, 1559:21

arbitrarily [1] - 1451:45

arbitrary [5] - 1451:25, 1452:21, 1523:30, 1523:44, 1538:41

Area [9] - 1500:8, 1500:14, 1500:34, 1502:17, 1504:4, 1523:10, 1527:13, 1566:9, 1567:42

area [19] - 1462:46, 1472:1, 1495:30, 1500:38, 1501:1, 1501:11, 1501:12, 1501:15, 1501:18, 1501:24, 1501:29, 1501:34, 1518:5, 1552:4, 1564:37, 1564:47, 1565:5, 1566:39, 1568:18

areas [3] - 1515:43, 1515:46, 1553:37

arena [2] - 1543:46, 1545:11

argued [1] - 1492:10

argument [1] - 1471:38

arise [2] - 1496:13, 1564:26

arising [3] - 1498:3, 1556:47, 1572:27

arms [1] - 1524:34

arose [4] - 1448:16, 1463:37, 1541:6, 1541:8

arranged [1] - 1528:47

arrival [2] - 1460:6, 1505:4

arrived [16] - 1530:21, 1530:29, 1530:41, 1531:6, 1531:37, 1531:47, 1532:30, 1532:35, 1532:45, 1533:4, 1533:5, 1534:40, 1534:42, 1537:30

arrives [1] - 1531:19

arriving [1] - 1531:20

article [14] - 1462:11, 1462:19, 1462:21, 1484:22, 1484:31, 1484:38, 1484:39, 1487:19, 1488:25, 1489:41, 1556:26, 1559:8, 1559:12, 1566:28

articles [4] - 1473:11, 1473:16, 1473:17, 1489:17

articulate [1] - 1489:35

aside [1] - 1488:7

aspects [3] - 1486:18, 1491:21, 1553:29

assault [1] - 1553:43

assaults [1] - 1499:28

assert [1] - 1465:34

asserted [4] - 1477:42, 1483:13, 1490:33, 1490:46

assertion [7] - 1467:8, 1471:29, 1472:35, 1484:37, 1484:38, 1489:5, 1492:15

assertions [1] - 1484:31

assessment [1] - 1485:27

assigned [3] - 1450:27, 1470:44, 1501:24

assist [12] - 1447:4, 1494:21, 1496:23, 1503:4, 1511:28, 1513:42, 1514:13, 1514:19, 1565:6, 1565:39, 1566:4, 1567:11

assistance [7] - 1498:37, 1529:40, 1541:15, 1558:28, 1558:31, 1560:32, 1562:38

assistant [18] - 1488:3, 1501:38, 1502:12, 1502:36, 1504:3, 1504:8, 1510:12, 1564:21, 1564:23, 1564:28, 1564:37, 1565:1, 1565:7, 1565:10, 1565:14, 1565:16, 1567:38, 1568:20

Assistant [17] - 1451:42, 1462:25, 1478:15, 1487:31, 1497:33, 1502:39, 1527:1, 1527:17, 1527:37, 1541:2, 1554:9, 1554:17, 1554:19, 1563:40, 1563:44, 1564:1, 1564:6

assisted [1] - 1511:47

assisting [5] - 1457:25, 1457:33, 1465:19, 1491:21, 1564:23

Assisting [1] - 1446:37

associated [4] - 1470:28, 1512:33, 1560:12, 1571:38

association [1] - 1477:46

assume [10] - 1452:6, 1458:8, 1458:32, 1459:39, 1464:42, 1489:16, 1512:15, 1524:33, 1531:24

assumption [2] - 1489:29, 1550:6

assure [2] - 1463:22, 1528:26

astonished [1] - 1457:35

AT [3] - 1459:18, 1572:46, 1572:47

attach [2] - 1512:18, 1512:20

attached [10] - 1460:16, 1480:42, 1512:16, 1512:17, 1536:12, 1536:18, 1559:3, 1562:25, 1563:32, 1566:11

attaching [1] - 1565:47

attempt [4] - 1518:4, 1544:39, 1545:23, 1559:29

attempting [1] - 1543:11

attempts [2] - 1461:40, 1486:25

attend [1] - 1505:18
attendance [2] - 1507:29, 1530:11
attending [2] - 1505:24, 1567:26
attention [8] - 1464:11, 1487:40, 1487:41, 1488:2, 1494:24, 1505:1, 1556:1, 1571:35
attest [1] - 1501:18
attested [2] - 1499:16, 1563:11
attract [1] - 1553:46
attuned [1] - 1481:38
August [5] - 1455:7, 1455:45, 1458:21, 1458:25, 1458:26
author [1] - 1532:43
authored [1] - 1512:6
authorisation [1] - 1506:38
authorise [1] - 1567:33
authorised [1] - 1567:37
authority [5] - 1510:11, 1567:35, 1568:14, 1568:17, 1568:20
available [7] - 1489:39, 1491:19, 1491:39, 1491:42, 1511:21, 1518:1, 1544:7
average [1] - 1553:45
avoid [2] - 1482:11, 1553:14
avoiding [3] - 1554:4, 1554:41, 1554:47
aware [27] - 1473:2, 1480:15, 1486:4, 1487:2, 1490:3, 1490:26, 1493:30, 1493:34, 1493:36, 1497:22, 1497:38, 1507:36, 1507:39, 1507:40, 1507:44, 1510:46, 1517:27, 1525:30, 1527:8, 1527:13, 1537:7, 1537:26, 1537:27, 1537:29, 1544:4, 1567:10, 1567:13

B

background [5] - 1465:20, 1522:47, 1525:8, 1527:16, 1557:14
bad [6] - 1471:11, 1471:15, 1481:34, 1482:11, 1482:12, 1547:30
badly [1] - 1505:28
balance [1] - 1560:6
Bar [3] - 1446:5, 1472:35, 1490:33
barrier [1] - 1458:29
barrister [2] - 1451:38, 1561:19
base [1] - 1551:38
based [12] - 1471:33, 1477:45, 1479:25, 1492:13, 1511:11, 1534:34, 1536:15, 1536:16, 1543:44, 1564:21, 1566:16, 1568:37
basic [4] - 1503:7, 1523:12, 1523:15, 1526:26
basically [11] - 1500:41, 1500:43, 1501:19, 1502:7, 1510:5, 1514:43, 1517:39, 1537:39, 1537:41, 1557:27
basis [14] - 1449:29, 1459:24, 1462:45, 1466:27, 1471:31, 1472:10, 1478:32, 1479:30, 1481:11, 1489:5, 1491:37, 1492:35, 1542:42, 1544:17
bear [1] - 1458:41
bearings [1] - 1489:30
bears [1] - 1479:7
became [8] - 1465:44, 1481:12, 1502:21, 1507:44, 1526:12, 1537:27, 1563:36, 1563:40
become [7] - 1447:46, 1497:38, 1510:46, 1524:41, 1548:42, 1563:45, 1564:5
bed [1] - 1555:21
befits [1] - 1510:2
beg [7] - 1477:20, 1532:9, 1536:37, 1537:15, 1538:6, 1548:14, 1570:9
began [3] - 1499:21, 1510:46, 1528:9
beginning [1] - 1528:13
behalf [2] - 1565:1, 1566:8
behind [5] - 1467:30, 1471:2, 1548:17, 1548:28, 1551:3
belief [8] - 1465:8, 1471:24, 1471:26, 1471:32, 1471:33, 1471:39, 1477:45, 1536:43
belong [1] - 1544:6
benefit [3] - 1471:41, 1500:37, 1549:11
benefits [2] - 1501:17, 1501:25
best [12] - 1458:1, 1458:14, 1464:34, 1469:15, 1488:20, 1490:12, 1513:17, 1517:46, 1526:38, 1530:37, 1543:29, 1559:38
betray [1] - 1552:39
better [8] - 1449:40, 1463:44, 1488:22, 1501:10, 1503:11, 1526:12, 1553:44, 1564:30
between [16] - 1451:25, 1458:43, 1461:46, 1472:28, 1481:13, 1485:15, 1489:31, 1509:13, 1510:30, 1517:27, 1526:6, 1526:18, 1534:28, 1537:9, 1556:32, 1564:37
beyond [1] - 1545:16
big [1] - 1524:34
bit [10] - 1459:4, 1483:5, 1487:27, 1506:28, 1525:22, 1527:15, 1556:12, 1557:19, 1557:24, 1560:4
blacken [2] - 1547:14, 1547:22
blackening [1] - 1483:30
blindfold [1] - 1463:17
blue [1] - 1526:33
body [2] - 1447:15, 1493:3
book [3] - 1466:41, 1494:30, 1507:21
bottom [4] - 1503:17, 1503:18, 1533:32, 1566:42
bound [1] - 1491:9
boundaries [1] - 1447:47
bowlies [1] - 1543:39
box [10] - 1446:18, 1498:33, 1517:5, 1522:28, 1524:7, 1544:25, 1548:36, 1549:17, 1550:13, 1550:47
brackets [1] - 1561:1
breeze [1] - 1471:27
brief [7] - 1464:26, 1480:18, 1484:16, 1514:43, 1526:29, 1553:35, 1564:19
briefed [5] - 1480:16, 1502:10, 1503:44, 1527:1, 1528:41
briefing [15] - 1502:34, 1502:42, 1512:30, 1513:26, 1515:28, 1523:12, 1523:29, 1527:9, 1527:16, 1527:47, 1528:2, 1528:32, 1565:6, 1565:8, 1565:9
briefings [3] - 1523:20, 1523:23
briefs [3] - 1499:39, 1512:45, 1552:40
bring [6] - 1466:41, 1487:40, 1488:2, 1497:18, 1537:6, 1542:16
bringing [1] - 1479:31
Brisbane [1] - 1500:34
broad [5] - 1466:2, 1467:15, 1470:7, 1470:35, 1488:22
broadens [1] - 1449:7
broke [2] - 1481:17, 1481:19
broken [1] - 1481:5
brought [1] - 1487:41
BTS [1] - 1495:41
bucket [1] - 1560:27
bullet [1] - 1556:30
bundle [12] - 1453:14, 1456:33, 1457:37, 1463:33, 1465:41, 1468:47, 1484:23, 1524:9, 1547:35, 1548:28, 1548:35, 1550:46
bundles [1] - 1524:8
burden [2] - 1528:45, 1536:39
bureaucratic [1] - 1496:1
business [3] - 1489:44, 1524:39, 1531:1
businesslike [1] - 1514:22
busy [2] - 1510:44, 1514:21
but [1] - 1504:5
BY [10] - 1446:31, 1484:2, 1489:2, 1498:24, 1522:24, 1556:7, 1557:37, 1562:17, 1569:17, 1571:13

C

c@ts.i [1] - 1496:7
calendar [1] - 1461:36
cannot [2] - 1491:6, 1536:9
capabilities [1] - 1482:42
capacity [3] - 1502:22, 1502:31, 1502:32
care [3] - 1466:45, 1482:9, 1529:1
careful [4] - 1473:10, 1490:2, 1559:46, 1559:47
carefully [3] - 1490:20, 1525:12, 1548:3
Carlene [2] - 1563:41, 1564:6
carriage [8] - 1482:44, 1500:47, 1504:4, 1507:12, 1509:33, 1526:42, 1527:14, 1555:25
carried [1] - 1499:20
carry [2] - 1495:28, 1500:46
carrying [1] - 1501:4
case [42] - 1447:21, 1447:31, 1447:37, 1449:22, 1449:33, 1449:42, 1451:23, 1451:44, 1455:6, 1470:44, 1480:22, 1487:42, 1488:13, 1491:6, 1494:37, 1495:2, 1495:14, 1495:29, 1495:34, 1495:41, 1495:43, 1496:3, 1496:19, 1496:20, 1496:33, 1496:34, 1496:43, 1496:47, 1506:2, 1527:23, 1528:26,

1528:31, 1528:34,
1528:41, 1534:42,
1535:15, 1536:9,
1551:35, 1555:20,
1556:32, 1556:35
cases [2] - 1495:40,
1495:41
cast [2] - 1446:41,
1526:47
category [2] -
1552:16, 1552:36
Catholic [10] -
1455:26, 1455:42,
1467:34, 1486:40,
1503:12, 1506:23,
1514:35, 1553:44,
1558:5, 1566:29
CATHOLIC [1] -
1446:16
caused [1] - 1457:42
causing [1] - 1560:14
cc [1] - 1571:24
cease [1] - 1508:33
cent [7] - 1463:46,
1466:8, 1502:23,
1544:9, 1551:45,
1552:31, 1553:19
Central [1] - 1571:31
certain [11] - 1466:8,
1498:44, 1505:45,
1514:8, 1514:10,
1517:29, 1531:1,
1544:10, 1555:28,
1560:14
CERTAIN [1] -
1446:16
certainly [18] - 1451:3,
1457:21, 1461:40,
1462:3, 1468:27,
1487:43, 1499:28,
1505:42, 1507:41,
1510:5, 1510:8,
1524:37, 1533:3,
1549:17, 1555:25,
1565:35, 1567:23,
1570:32
cetera [1] - 1507:18
chain [3] - 1465:14,
1517:39, 1517:43
chance [1] - 1553:45
change [2] - 1478:40,
1499:4
charge [7] - 1447:42,
1490:27, 1496:36,
1509:26, 1509:27,
1510:14, 1552:13
charged [1] - 1500:22
CHART [1] - 1459:19
chart [1] - 1456:5
charted [1] - 1458:10
check [3] - 1458:44,
1465:30, 1483:9
chided [1] - 1542:39
chief [7] - 1469:3,
1474:14, 1513:33,
1520:42, 1540:14,
1540:23, 1549:41
Chief [77] - 1446:12,
1446:33, 1450:7,
1457:8, 1457:39,
1461:42, 1465:21,
1467:38, 1469:5,
1469:11, 1470:29,
1470:40, 1471:3,
1471:9, 1471:21,
1472:10, 1481:3,
1486:9, 1489:7,
1493:21, 1494:9,
1495:6, 1496:2,
1496:11, 1496:16,
1497:14, 1497:17,
1498:9, 1498:16,
1503:21, 1505:39,
1507:32, 1509:39,
1509:44, 1509:46,
1510:18, 1510:25,
1510:32, 1511:1,
1511:5, 1511:19,
1511:26, 1512:7,
1512:11, 1513:12,
1513:34, 1515:9,
1515:14, 1515:23,
1516:14, 1516:21,
1516:31, 1517:28,
1517:30, 1517:35,
1518:9, 1524:13,
1531:11, 1531:18,
1531:24, 1531:33,
1531:38, 1532:36,
1539:36, 1540:2,
1540:26, 1541:43,
1542:4, 1542:46,
1544:38, 1545:7,
1545:32, 1550:3,
1550:42, 1567:17,
1567:46, 1571:27
CHIEF [1] - 1459:18
child [7] - 1467:34,
1499:33, 1552:24,
1552:26, 1553:10,
1566:30, 1566:31
CHILD [1] - 1446:16
children [1] - 1553:12
chooses [1] - 1492:25
Christchurch [2] -
1460:8, 1460:9
chronology [9] -
1458:10, 1481:17,
1533:13, 1534:13,
1534:19, 1534:34,
1536:14, 1536:15,
1536:16
Church [10] - 1446:26,
1455:26, 1455:42,
1467:35, 1503:12,
1506:23, 1514:35,
1553:44, 1558:6,
1566:29
church [2] - 1486:40,
1486:46
CI [1] - 1499:29
CI-type [1] - 1499:29
circumstances [18] -
1446:40, 1449:33,
1451:37, 1452:7,
1452:20, 1462:8,
1477:26, 1477:34,
1477:41, 1496:47,
1524:25, 1525:4,
1525:8, 1559:28,
1568:3, 1569:33,
1570:15, 1570:22
City [4] - 1458:22,
1458:36, 1527:13,
1571:41
clarifies [1] - 1459:22
clarify [5] - 1458:15,
1502:14, 1502:38,
1531:16, 1542:42
clarity [2] - 1528:21,
1531:10
clear [17] - 1447:46,
1448:27, 1451:16,
1452:12, 1468:5,
1470:15, 1479:4,
1506:40, 1507:46,
1511:14, 1527:20,
1527:30, 1531:27,
1549:5, 1558:15,
1570:10, 1572:18
clearly [6] - 1468:10,
1479:46, 1481:9,
1485:4, 1496:18,
1516:37
clergy [4] - 1543:26,
1543:27, 1544:1,
1545:14
client [8] - 1474:46,
1491:4, 1491:8,
1491:12, 1491:45,
1543:45, 1545:10,
1545:16
clipped [2] - 1549:10,
1556:15
clips [1] - 1549:15
close [3] - 1465:41,
1483:8, 1556:10
closed [1] - 1496:47
clue [1] - 1456:37
coding [1] - 1570:10
Cohen [57] - 1446:16,
1446:20, 1446:35,
1447:11, 1452:38,
1455:28, 1456:19,
1456:22, 1456:25,
1456:44, 1457:6,
1459:6, 1461:22,
1461:27, 1463:14,
1463:30, 1464:37,
1465:39, 1467:1,
1471:28, 1471:47,
1473:1, 1474:26,
1482:5, 1483:11,
1483:44, 1489:4,
1496:30, 1520:44,
1530:9, 1530:42,
1531:29, 1532:14,
1533:14, 1534:17,
1534:32, 1535:7,
1535:34, 1535:47,
1536:11, 1539:28,
1543:45, 1544:4,
1544:27, 1545:4,
1545:10, 1546:36,
1548:37, 1549:20,
1549:45, 1551:40,
1552:3, 1553:6,
1555:4, 1569:15,
1569:43, 1570:37
COHEN [80] - 1446:22,
1446:27, 1446:31,
1446:33, 1455:6,
1455:31, 1455:44,
1456:36, 1457:2,
1457:33, 1457:45,
1459:21, 1461:15,
1461:24, 1461:29,
1461:33, 1463:12,
1463:16, 1463:25,
1465:30, 1465:37,
1465:41, 1466:23,
1466:27, 1466:37,
1466:43, 1467:5,
1471:20, 1472:3,
1472:9, 1472:16,
1472:33, 1472:41,
1473:4, 1477:12,
1482:11, 1483:8,
1483:13, 1483:42,
1490:32, 1491:3,
1494:21, 1496:5,
1496:13, 1496:22,
1522:24, 1522:26,
1531:15, 1531:27,
1531:31, 1535:12,
1536:21, 1541:38,
1541:42, 1542:12,
1542:30, 1542:35,
1543:2, 1543:7,
1543:37, 1544:13,
1544:24, 1545:6,
1548:39, 1548:45,
1549:5, 1549:15,
1550:3, 1550:9,
1550:28, 1550:38,
1552:7, 1554:30,
1555:17, 1555:33,
1555:38, 1555:44,
1569:17, 1569:19,
1570:35
coincide [1] - 1535:9
coincidence [2] -
1492:45, 1493:2
coincidences [3] -
1462:11, 1462:18,
1493:13
collate [1] - 1549:1
collected [5] - 1513:4,
1542:4, 1567:4,
1571:39, 1572:14
collection [2] -
1572:10, 1572:20
colour [2] - 1465:20,
1570:10
colourful [2] - 1561:6,
1561:7
column [1] - 1556:30
coming [3] - 1498:43,
1516:10, 1536:33
command [26] -
1448:39, 1452:42,
1453:7, 1455:10,
1455:24, 1455:33,
1464:10, 1495:30,
1500:39, 1501:1,
1501:11, 1501:18,
1501:24, 1509:9,
1512:38, 1524:29,
1554:36, 1554:37,
1554:41, 1554:47,
1564:7, 1564:22,
1564:38, 1565:9,
1566:39, 1568:19
Command [11] -
1500:8, 1500:14,
1500:34, 1502:18,
1504:4, 1523:10,
1527:14, 1562:26,
1566:9, 1567:42,
1571:31
commander [27] -
1450:35, 1453:6,
1455:46, 1455:47,
1458:33, 1459:32,
1464:26, 1470:12,
1477:18, 1477:23,
1478:14, 1478:16,
1480:46, 1482:22,
1502:10, 1527:17,
1528:31, 1528:33,
1528:34, 1540:27,

1563:45, 1566:8,
1566:33, 1566:40,
1569:35, 1569:36,
1569:38
Commander [9] -
1477:35, 1478:7,
1478:19, 1554:13,
1554:16, 1555:23,
1568:39, 1569:1,
1569:8
Commander's [1] -
1533:38
commands [10] -
1485:6, 1485:15,
1495:19, 1496:40,
1501:12, 1501:29,
1501:34, 1556:32,
1565:1, 1565:5
Commands [1] -
1567:4
commas [2] - 1561:1,
1561:37
commence [2] -
1485:8, 1485:47
commenced [3] -
1459:39, 1477:15,
1477:25
commencement [1] -
1485:5
commencing [2] -
1504:2, 1571:26
comment [28] -
1448:28, 1449:46,
1451:21, 1455:11,
1461:41, 1466:13,
1466:16, 1467:45,
1470:32, 1481:24,
1482:40, 1482:42,
1483:26, 1483:29,
1487:47, 1488:5,
1540:47, 1541:21,
1542:46, 1543:10,
1546:9, 1556:31,
1556:35, 1560:18,
1561:10, 1561:11,
1561:39, 1566:32
commenting [1] -
1450:46
comments [6] -
1553:46, 1554:4,
1557:8, 1557:9,
1557:11, 1561:12
Commission [14] -
1447:24, 1456:10,
1457:26, 1463:1,
1471:42, 1474:21,
1489:35, 1491:26,
1491:29, 1491:39,
1491:46, 1492:24,
1493:4, 1493:5
COMMISSION [2] -
1446:12, 1572:46
Commission's [1] -
1493:7
commissioner [21] -
1488:3, 1501:38,
1502:12, 1502:36,
1504:3, 1504:8,
1510:12, 1548:41,
1554:22, 1562:11,
1562:32, 1564:21,
1564:28, 1564:37,
1565:1, 1565:7,
1565:10, 1565:14,
1565:17, 1567:38,
1568:21
COMMISSIONER [85]
- 1446:10, 1446:14,
1446:20, 1446:25,
1455:28, 1455:35,
1456:25, 1456:44,
1457:29, 1459:9,
1459:15, 1461:21,
1461:26, 1461:31,
1463:10, 1463:14,
1463:22, 1465:28,
1465:39, 1467:1,
1471:18, 1471:46,
1472:6, 1472:30,
1472:38, 1472:47,
1482:5, 1483:11,
1483:44, 1488:42,
1488:47, 1490:22,
1491:14, 1491:34,
1492:2, 1492:27,
1492:31, 1492:39,
1492:43, 1493:9,
1494:14, 1494:19,
1496:10, 1496:30,
1497:8, 1498:2,
1498:7, 1498:20,
1499:10, 1516:43,
1520:44, 1531:29,
1535:5, 1542:33,
1542:44, 1543:4,
1543:13, 1543:17,
1544:21, 1545:3,
1549:13, 1549:45,
1550:26, 1550:32,
1552:3, 1554:28,
1555:9, 1555:15,
1555:20, 1555:36,
1555:42, 1556:5,
1557:35, 1559:5,
1560:45, 1561:44,
1562:6, 1562:35,
1563:5, 1569:15,
1570:37, 1570:42,
1572:26, 1572:31,
1572:43
Commissioner [71] -
1446:34, 1446:1,
1446:23, 1451:42,
1455:22, 1456:31,
1456:41, 1457:34,
1461:33, 1462:25,
1463:19, 1470:29,
1471:21, 1472:17,
1478:15, 1479:31,
1480:6, 1483:8,
1483:14, 1483:42,
1487:32, 1488:40,
1488:45, 1491:16,
1496:23, 1497:10,
1497:34, 1498:5,
1498:12, 1498:43,
1502:39, 1516:40,
1523:7, 1524:22,
1525:2, 1527:1,
1527:17, 1527:36,
1527:37, 1527:40,
1529:25, 1530:35,
1534:47, 1536:21,
1536:32, 1536:37,
1540:37, 1541:2,
1542:3, 1543:9,
1554:9, 1554:17,
1554:19, 1555:3,
1555:17, 1555:33,
1555:44, 1557:33,
1561:42, 1561:47,
1562:43, 1563:3,
1563:40, 1563:44,
1564:1, 1564:6,
1570:35, 1570:40,
1570:45, 1572:29,
1572:39
Commissioner's [1] -
1479:11
commitments [1] -
1564:24
communication [1] -
1462:4
communications [2] -
1469:32, 1472:25
company [2] -
1468:32, 1528:3
compared [1] -
1447:28
compass [1] - 1502:6
compensating [1] -
1491:3
compilation [1] -
1448:20
complainant [3] -
1477:36, 1478:12,
1478:20
complaint [23] -
1446:4, 1449:30,
1462:23, 1474:3,
1474:7, 1474:10,
1477:12, 1477:15,
1477:17, 1477:25,
1477:34, 1477:41,
1477:43, 1477:45,
1478:2, 1478:6,
1478:23, 1478:24,
1478:31, 1478:32,
1481:14, 1494:26
complaints [2] -
1449:23, 1449:25
complete [3] - 1511:5,
1538:35, 1556:22
completed [6] -
1486:18, 1486:29,
1487:3, 1496:37,
1538:45, 1539:5
completely [2] -
1471:43, 1529:37
completing [1] -
1538:43
complex [3] - 1488:8,
1499:26, 1499:27
comply [1] - 1477:42
comprehensive [1] -
1467:38
concealing [1] -
1452:23
concealment [5] -
1448:17, 1449:7,
1452:33, 1467:34,
1546:22
concede [12] -
1487:43, 1487:47,
1488:15, 1491:41,
1531:2, 1533:16,
1534:24, 1534:27,
1557:29, 1558:4,
1559:36, 1561:18
conceivable [1] -
1569:7
concept [1] - 1544:43
conceptual [1] -
1449:35
conceptually [2] -
1449:39, 1452:5
concern [9] - 1480:38,
1481:36, 1482:11,
1489:6, 1508:15,
1527:18, 1554:3,
1554:41, 1554:47
concerned [3] -
1463:7, 1527:31,
1528:35
concerns [5] -
1455:33, 1474:19,
1489:35, 1511:23,
1555:12
concession [1] -
1556:45
concluded [1] -
1555:39
conclusion [1] -
1541:11
conduct [2] - 1482:19,
1543:29
conducted [6] -
1450:31, 1467:39,
1512:34, 1537:43,
1545:12, 1545:13
conduit [1] - 1564:44
confer [1] - 1463:5
conference [1] -
1468:31
confident [3] -
1503:26, 1513:29,
1568:29
confidential [3] -
1463:1, 1492:14,
1493:4
confirm [4] - 1503:22,
1511:46, 1513:16,
1529:26
confirms [1] - 1469:19
conflicted [1] -
1559:40
conformed [1] -
1478:12
confront [1] - 1455:25
confronted [1] -
1528:38
confusing [2] -
1532:37, 1545:16
confusion [2] -
1479:11, 1554:23
cons [1] - 1501:36
consequence [1] -
1566:35
consider [3] -
1455:22, 1538:3,
1545:17
consideration [3] -
1464:10, 1538:9,
1554:9
considered [2] -
1511:26, 1516:22
consistently [1] -
1543:45
Constable [1] - 1487:7
constantly [1] -
1543:28
constrain [1] -
1452:21
constrained [1] -
1491:5
constriction [1] -
1449:41
constructed [1] -
1531:32
construction [1] -

1469:46
contact [17] - 1462:2, 1470:44, 1481:8, 1485:42, 1486:11, 1486:12, 1510:17, 1513:38, 1513:40, 1513:42, 1514:9, 1514:39, 1515:1, 1524:18, 1565:20, 1566:39
contacted [2] - 1486:11, 1513:43
contacts [5] - 1511:27, 1511:41, 1512:37, 1557:44, 1558:5
contain [1] - 1517:40
contained [1] - 1516:38
contemplated [1] - 1449:21
contemplates [1] - 1470:10
contend [1] - 1465:14
content [3] - 1511:44, 1557:29, 1558:27
contents [3] - 1498:47, 1539:35, 1562:47
context [7] - 1484:16, 1487:18, 1488:16, 1489:11, 1513:15, 1552:24, 1570:16
contextualise [1] - 1455:37
continually [1] - 1483:14
continue [4] - 1463:23, 1490:46, 1543:17, 1543:21
continued [1] - 1500:3
continuing [1] - 1461:21
contrived [1] - 1490:14
contriving [1] - 1490:44
control [2] - 1474:41, 1501:22
controversial [1] - 1465:44
convenience [1] - 1469:1
convenient [4] - 1461:15, 1461:24, 1469:2, 1516:40
conversation [24] - 1451:13, 1451:19, 1462:8, 1481:24, 1508:7, 1508:10, 1513:34, 1517:19, 1517:22, 1525:1, 1525:24, 1525:27, 1551:25, 1557:5, 1558:15, 1558:23, 1559:7, 1559:33, 1565:27, 1565:36, 1565:38, 1566:5, 1566:7, 1566:26
conversations [2] - 1510:26, 1568:39
convey [1] - 1565:16
conveyed [1] - 1568:31
convinced [1] - 1508:18
cooperation [1] - 1542:27
cooperative [1] - 1545:27
copied [1] - 1469:5
copies [2] - 1536:43, 1537:6
COPS [2] - 1494:31, 1496:8
copy [15] - 1446:45, 1446:47, 1498:41, 1498:42, 1498:43, 1504:45, 1507:7, 1522:26, 1529:15, 1536:18, 1549:10, 1562:42, 1562:43, 1572:6
correct [55] - 1450:1, 1458:34, 1470:12, 1489:29, 1492:14, 1498:27, 1498:39, 1499:1, 1499:18, 1499:22, 1499:34, 1499:43, 1499:47, 1500:5, 1500:23, 1500:28, 1502:2, 1502:3, 1502:19, 1502:23, 1506:10, 1506:19, 1509:40, 1514:15, 1523:24, 1524:35, 1527:11, 1527:33, 1529:19, 1529:26, 1530:15, 1533:13, 1535:15, 1543:30, 1543:31, 1550:44, 1551:45, 1555:30, 1558:28, 1559:25, 1562:23, 1562:27, 1562:47, 1563:17, 1563:33, 1563:38, 1563:41, 1564:8, 1564:11, 1567:28, 1569:30, 1572:11, 1572:15, 1572:16, 1572:22
correctly [6] - 1458:20, 1523:24, 1547:47, 1556:41, 1557:24, 1570:19
correspondence [2] - 1564:29, 1564:30
cough [1] - 1539:14
counsel [4] - 1465:19, 1491:20, 1535:30, 1545:3
Counsel [1] - 1446:37
counsel's [1] - 1536:8
couple [5] - 1501:25, 1505:1, 1513:32, 1515:34, 1523:33
coupled [1] - 1464:21
course [10] - 1460:8, 1468:39, 1490:19, 1492:23, 1493:41, 1495:24, 1497:38, 1555:42, 1556:5, 1557:15
court [4] - 1492:5, 1510:4, 1535:24, 1561:32
Court [2] - 1446:25, 1446:26
covered [1] - 1518:5
cranky [3] - 1480:9, 1480:19, 1480:22
created [1] - 1545:16
creating [1] - 1463:20
crime [30] - 1450:7, 1459:40, 1460:6, 1482:20, 1500:7, 1500:10, 1500:11, 1500:13, 1500:18, 1500:22, 1500:33, 1500:38, 1500:41, 1500:42, 1500:44, 1500:46, 1502:17, 1509:24, 1509:35, 1510:6, 1510:9, 1510:13, 1510:46, 1516:20, 1517:44, 1523:9, 1524:30, 1526:12, 1563:22
Crime [3] - 1469:33, 1571:31, 1571:40
crimes [1] - 1501:1
criminal [6] - 1491:27, 1499:25, 1499:27, 1499:29, 1500:27, 1500:43
criminality [1] - 1556:47
critical [3] - 1492:34, 1559:24, 1561:11
cross [10] - 1446:17, 1456:39, 1469:1, 1494:3, 1497:14, 1503:15, 1527:25, 1535:28, 1549:42, 1555:39
cross-examination [5] - 1446:17, 1456:39, 1494:3, 1549:42, 1555:39
cross-examining [1] - 1497:14
cross-purposes [2] - 1527:25, 1535:28
cross-reference [1] - 1503:15
cross-references [1] - 1469:1
Crown [1] - 1446:42
Cunneen [1] - 1446:34
curious [1] - 1464:8
current [7] - 1485:27, 1485:36, 1486:15, 1487:41, 1498:45, 1522:33, 1568:37
customer [1] - 1564:33

D

date [18] - 1458:25, 1459:47, 1460:2, 1472:25, 1478:39, 1478:44, 1479:7, 1479:41, 1495:9, 1501:47, 1523:30, 1524:23, 1524:46, 1524:47, 1525:24, 1539:21, 1563:47, 1566:16
DATED [4] - 1459:17, 1499:13, 1563:9
dated [6] - 1478:35, 1478:38, 1512:6, 1540:47, 1562:38, 1566:12
dates [14] - 1451:23, 1451:46, 1452:36, 1452:37, 1456:2, 1456:26, 1460:10, 1489:17, 1489:23, 1489:24, 1489:29, 1494:41, 1494:44, 1571:46
dating [1] - 1537:18
DAVID [1] - 1446:29
David [1] - 1446:38
day-to-day [1] - 1500:47
days [6] - 1462:27, 1497:44, 1502:44, 1515:34, 1523:33, 1566:28
DC [1] - 1480:15
DCI [35] - 1473:13, 1474:15, 1474:33, 1480:13, 1480:23, 1482:43, 1483:14, 1483:15, 1483:30, 1486:36, 1487:16, 1489:31, 1490:16, 1490:17, 1490:28, 1490:29, 1492:7, 1496:6, 1512:37, 1513:24, 1514:5, 1536:38, 1537:6, 1541:15, 1541:25, 1542:13, 1542:27, 1542:36, 1544:25, 1551:30, 1552:12, 1567:22, 1569:2, 1569:9, 1571:32
dead [1] - 1543:24
deal [8] - 1488:1, 1501:46, 1505:20, 1528:39, 1528:46, 1556:3, 1560:3
dealing [5] - 1491:26, 1524:18, 1526:38, 1549:22, 1565:12
dealings [2] - 1559:37, 1560:1
deals [2] - 1529:6, 1563:22
dealt [3] - 1461:29, 1477:25, 1560:2
debate [1] - 1504:23
debated [2] - 1504:24, 1504:26
debrief [7] - 1467:38, 1467:40, 1468:13, 1468:19, 1493:24, 1540:19, 1540:28
debriefed [3] - 1467:41, 1468:5, 1511:29
debriefing [3] - 1490:29, 1493:21, 1539:37
deceased [1] - 1497:1
December [42] - 1459:35, 1459:39, 1459:45, 1459:47, 1460:3, 1467:13, 1467:18, 1467:44, 1468:7, 1477:26, 1481:18, 1494:45, 1495:14, 1497:18, 1499:17, 1501:43, 1502:1, 1502:25,

1502:30, 1502:43,
1504:1, 1507:45,
1508:47, 1509:13,
1509:16, 1513:26,
1516:15, 1523:1,
1523:25, 1523:31,
1525:26, 1525:28,
1526:10, 1527:30,
1529:22, 1537:7,
1537:24, 1541:26,
1542:15, 1557:16,
1564:11, 1564:12
decide [1] - 1447:25
decided [2] - 1501:38,
1537:36
decision [6] -
1455:39, 1485:16,
1490:18, 1497:41,
1504:16, 1504:20
decision-making [3] -
1455:39, 1497:41,
1504:20
deemed [1] - 1510:8
defined [1] - 1470:20
definite [1] - 1552:44
definitely [2] -
1546:19, 1561:5
definition [4] -
1452:13, 1470:27,
1471:15, 1471:39
degraded [1] -
1525:25
delays [1] - 1512:33
deliberately [2] -
1490:14, 1545:25
delicate [2] - 1462:46,
1493:6
delighted [1] -
1453:13
deliver [2] - 1483:17,
1528:28
delivered [4] -
1477:23, 1478:37,
1528:21, 1571:39
delve [1] - 1509:36
demonstrate [1] -
1544:25
demonstrated [1] -
1472:35
demonstrates [1] -
1546:28
Department [1] -
1544:6
describe [4] -
1451:28, 1452:41,
1479:21, 1502:33
described [2] -
1482:21, 1561:34
description [3] -
1462:3, 1500:40,
1525:9
designed [2] -
1493:12, 1516:33
desire [1] - 1502:11
desired [1] - 1518:7
desires [1] - 1503:10
despite [3] - 1465:46,
1469:15, 1544:2
destroy [1] - 1489:41
detached [1] -
1548:42
detail [5] - 1509:36,
1517:29, 1518:8,
1546:34, 1546:36
detailed [3] - 1447:32,
1500:40, 1513:24
details [1] - 1511:44
detected [1] - 1528:35
Detective [141] -
1446:12, 1446:33,
1447:41, 1448:37,
1449:43, 1450:6,
1450:7, 1450:17,
1450:19, 1451:2,
1451:3, 1451:19,
1451:20, 1452:28,
1457:8, 1457:39,
1461:41, 1461:42,
1465:21, 1466:5,
1466:6, 1466:7,
1467:38, 1469:4,
1469:5, 1469:11,
1470:28, 1470:40,
1470:42, 1471:3,
1471:9, 1471:21,
1472:10, 1479:27,
1481:3, 1481:22,
1482:45, 1485:35,
1486:1, 1486:9,
1486:21, 1486:28,
1486:31, 1488:12,
1489:7, 1493:21,
1494:9, 1495:6,
1496:2, 1496:11,
1496:16, 1497:14,
1497:17, 1498:9,
1498:16, 1499:10,
1503:21, 1504:35,
1505:39, 1507:32,
1509:44, 1509:46,
1510:18, 1510:25,
1510:32, 1511:1,
1511:5, 1511:19,
1511:26, 1512:7,
1512:11, 1513:11,
1513:34, 1513:44,
1514:23, 1515:9,
1515:14, 1515:23,
1516:14, 1516:21,
1516:31, 1517:4,
1517:12, 1517:14,
1517:27, 1517:28,
1517:30, 1517:34,
1517:35, 1517:46,
1518:4, 1518:9,
1524:13, 1529:16,
1530:20, 1531:11,
1531:18, 1531:24,
1531:33, 1531:38,
1532:36, 1532:43,
1533:4, 1537:28,
1537:36, 1537:37,
1537:41, 1537:44,
1538:2, 1538:10,
1538:26, 1538:44,
1539:3, 1539:23,
1539:35, 1540:2,
1540:16, 1540:26,
1541:43, 1542:4,
1542:45, 1542:46,
1543:4, 1544:38,
1545:7, 1545:8,
1545:14, 1545:22,
1545:32, 1550:3,
1550:42, 1553:35,
1556:2, 1556:14,
1557:39, 1562:6,
1567:17, 1567:46,
1571:27, 1571:40
DETECTIVE [2] -
1459:18, 1499:13
detective [21] -
1447:14, 1469:2,
1474:14, 1498:29,
1498:34, 1498:47,
1499:42, 1500:25,
1517:7, 1522:26,
1532:28, 1534:27,
1538:30, 1540:36,
1542:22, 1544:4,
1548:45, 1550:29,
1554:13, 1560:11,
1561:9
detectives [3] -
1500:3, 1552:26,
1553:9
determination [1] -
1527:21
determinations [1] -
1493:10
determine [3] -
1458:14, 1485:28,
1485:40
determined [3] -
1490:27, 1490:30,
1493:23
determining [1] -
1447:27
DI [4] - 1449:46,
1462:37, 1478:33,
1538:26
DIAGRAMS [1] -
1459:17
diaries [1] - 1458:44
diary [9] - 1507:21,
1507:22, 1509:1,
1533:15, 1535:38,
1535:39, 1536:19,
1546:20, 1564:23
diatribe [1] - 1546:37
different [8] - 1458:16,
1458:17, 1482:36,
1483:36, 1494:28,
1504:15, 1510:14
differently [3] -
1483:2, 1483:6,
1509:41
difficult [10] - 1463:19,
1472:30, 1480:12,
1523:32, 1552:12,
1552:25, 1552:42,
1553:2, 1553:5
difficulties [1] -
1491:44
difficulty [12] - 1446:7,
1456:14, 1456:38,
1463:20, 1463:29,
1481:4, 1490:35,
1490:37, 1491:3,
1491:24, 1491:25,
1550:10
diocese [2] - 1487:11,
1488:23
DIOCESE [1] -
1446:18
direct [4] - 1493:42,
1494:24, 1509:31,
1564:27
directed [6] - 1483:16,
1483:19, 1483:23,
1483:29, 1541:44,
1542:14
direction [15] -
1448:37, 1448:38,
1457:47, 1470:11,
1477:42, 1478:3,
1506:24, 1508:22,
1508:41, 1508:43,
1508:44, 1508:46,
1509:4, 1509:7,
1509:9
directions [3] -
1483:25, 1497:37,
1497:39
directly [4] - 1471:8,
1531:5, 1544:45,
1564:29
directs [1] - 1493:1
disadvantages [1] -
1501:19
disagrees [1] -
1490:34
discharge [1] -
1538:20
disclosed [2] -
1530:18, 1541:24
discloses [2] -
1550:16, 1550:41
discretion [1] -
1569:37
discursive [1] -
1542:38
discuss [7] - 1462:24,
1504:19, 1507:12,
1514:9, 1514:18,
1514:27, 1514:33
discussed [7] -
1447:26, 1480:17,
1515:41, 1517:46,
1572:9, 1572:13,
1572:20
discussion [17] -
1451:10, 1461:46,
1469:38, 1469:46,
1470:6, 1470:33,
1512:42, 1514:46,
1515:13, 1516:31,
1525:14, 1525:44,
1538:3, 1539:16,
1540:25, 1566:19,
1569:7
discussions [10] -
1450:29, 1451:2,
1451:11, 1452:47,
1497:33, 1510:31,
1537:35, 1537:37,
1537:39, 1565:34
disinclined [1] -
1459:11
dislike [3] - 1474:15,
1544:25, 1544:37
disobeyed [1] -
1478:3
disparaging [1] -
1482:21
dispatched [1] -
1542:37
display [2] - 1541:16,
1543:43
dispute [2] - 1452:32,
1561:7
disrespect [1] -
1457:33
distance [1] - 1468:41
distribution [1] -
1500:9
divider [1] - 1548:28
divides [1] - 1548:17
division [2] - 1563:22,
1563:26

document [69] - 1528:1, 1537:29, 1447:3, 1447:41, 1448:20, 1449:3, 1450:44, 1451:29, 1451:39, 1451:41, 1451:46, 1452:2, 1456:21, 1456:25, 1456:46, 1457:13, 1457:36, 1458:20, 1459:6, 1459:11, 1461:16, 1463:37, 1464:1, 1464:8, 1467:7, 1469:47, 1470:16, 1478:47, 1479:7, 1479:20, 1480:45, 1484:22, 1484:28, 1494:28, 1495:5, 1496:8, 1503:7, 1503:9, 1503:21, 1503:23, 1503:29, 1512:41, 1512:45, 1513:2, 1513:24, 1538:11, 1538:19, 1539:32, 1539:34, 1539:45, 1540:47, 1541:1, 1543:25, 1545:39, 1546:6, 1547:34, 1547:35, 1548:10, 1549:26, 1549:42, 1550:12, 1550:16, 1550:23, 1550:38, 1550:41, 1550:44, 1551:47, 1563:3, 1566:6, 1566:11, 1566:16

document [6] - 1522:39, 1529:8, 1530:8, 1547:32, 1557:22, 1561:17

documentation [13] - 1467:20, 1467:25, 1467:33, 1477:45, 1493:11, 1516:38, 1537:3, 1543:46, 1545:11, 1550:18, 1567:3, 1567:11, 1571:38

documents [49] - 1463:27, 1464:22, 1467:12, 1467:17, 1467:18, 1468:45, 1477:16, 1477:21, 1478:44, 1483:17, 1483:19, 1483:23, 1486:44, 1487:11, 1488:23, 1494:29, 1502:45, 1503:5, 1503:16, 1503:46, 1510:47, 1513:4, 1523:21, 1524:6, 1528:1, 1537:29, 1540:21, 1541:27, 1542:16, 1542:18, 1542:20, 1542:37, 1543:23, 1543:32, 1544:2, 1544:5, 1544:6, 1544:10, 1545:12, 1545:33, 1547:27, 1551:3, 1554:23, 1565:4, 1567:31, 1569:2, 1569:9

done [16] - 1448:31, 1472:28, 1486:16, 1486:18, 1487:25, 1490:30, 1491:8, 1495:35, 1496:47, 1516:8, 1525:37, 1525:41, 1526:15, 1547:19, 1568:3, 1570:28

doubt [3] - 1456:36, 1509:7, 1511:4

down [13] - 1447:26, 1453:4, 1457:12, 1457:16, 1468:28, 1471:28, 1477:44, 1503:18, 1510:6, 1527:38, 1551:13, 1561:29, 1561:30

draft [1] - 1539:45

draw [4] - 1484:8, 1485:13, 1485:46, 1505:1

drawn [3] - 1492:20, 1556:1, 1559:30

drive [1] - 1482:34

driven [1] - 1544:13

drop [2] - 1513:19, 1560:27

dropped [1] - 1513:20

drug [1] - 1500:9

DSC [1] - 1551:31

due [1] - 1492:23

DUNN [2] - 1562:15, 1563:9

Dunn [19] - 1461:47, 1462:2, 1462:8, 1462:30, 1462:32, 1462:34, 1462:39, 1464:4, 1464:20, 1464:23, 1464:25, 1464:30, 1464:47, 1465:6, 1465:15, 1562:12, 1562:20, 1563:6, 1569:19

during [12] - 1456:6, 1460:15, 1490:18, 1493:40, 1495:24, 1495:39, 1497:37, 1505:43, 1511:46, 1514:46, 1529:28, 1567:22

dust [1] - 1461:36

duties [9] - 1499:20, 1499:32, 1500:21, 1500:27, 1500:47, 1501:5, 1502:5, 1563:35, 1564:20

duty [9] - 1455:38, 1455:46, 1458:22, 1458:39, 1458:42, 1459:27, 1459:36, 1507:21, 1553:19

E

e@gle.i [8] - 1461:39, 1482:38, 1487:25, 1487:26, 1513:19, 1526:14, 1538:21, 1541:43

early [13] - 1470:44, 1479:43, 1485:31, 1490:18, 1490:29, 1513:35, 1513:39, 1523:25, 1523:38, 1525:26, 1526:10, 1539:18

ease [1] - 1479:16

easier [2] - 1504:40, 1556:12

easily [1] - 1452:32

easy [2] - 1552:40, 1552:41

Education [1] - 1562:25

effect [13] - 1479:20, 1484:5, 1484:33, 1486:22, 1490:13, 1507:33, 1508:32, 1518:7, 1526:38, 1529:17, 1530:14, 1536:33, 1540:38

effectively [4] - 1451:37, 1479:22, 1507:3, 1507:4

efficiency [1] - 1539:11

efficient [1] - 1539:4

either [11] - 1448:20, 1465:11, 1468:37, 1477:21, 1498:35, 1509:9, 1513:39, 1525:41, 1530:13, 1546:21, 1559:16

element [2] - 1449:8, 1449:14

elicit [1] - 1493:12

email [29] - 1464:23, 1464:27, 1467:21, 1468:38, 1469:3, 1470:10, 1470:31, 1470:47, 1472:25, 1514:3, 1514:4, 1514:8, 1517:27, 1517:30, 1517:34, 1517:40, 1517:43, 1545:7, 1545:15, 1545:34, 1546:2, 1547:27, 1558:24, 1565:47, 1566:11, 1571:22, 1571:46, 1572:4

emails [1] - 1517:39

embark [1] - 1456:38

embarrassed [2] - 1549:17, 1549:19

embraced [1] - 1538:14

emerged [1] - 1466:34

Emma [1] - 1446:42

employ [1] - 1511:41

enable [1] - 1565:5

encompasses [1] - 1467:15

end [13] - 1446:6, 1451:19, 1461:36, 1483:8, 1491:43, 1517:11, 1522:42, 1529:6, 1538:42, 1539:10, 1554:24, 1559:29, 1564:13

endeavour [4] - 1463:12, 1463:17, 1544:24, 1544:37

endeavouring [1] - 1472:9

ended [2] - 1452:27, 1501:9

enforced [1] - 1506:39

enormous [1] - 1457:34

ensure [8] - 1504:14, 1504:17, 1517:47, 1518:4, 1528:10, 1528:22, 1535:28, 1546:25

entailed [1] - 1569:37

enthusiasm [19] - 1541:17, 1541:24, 1542:33, 1542:47, 1543:10, 1543:44, 1544:42, 1545:9, 1546:7, 1546:29, 1546:35, 1547:28, 1548:6, 1548:11, 1549:21, 1550:17, 1550:41, 1553:29, 1553:36

enthusiastic [4] - 1543:34, 1552:33, 1553:27, 1553:33

entire [2] - 1451:4, 1557:27

entirely [2] - 1554:35, 1569:10

entirety [1] - 1460:15

entitled [1] - 1490:47

entries [4] - 1495:16, 1495:38, 1495:46, 1546:20

entry [4] - 1494:31, 1495:8, 1505:3, 1533:11

enumerate [1] - 1446:1

equally [1] - 1474:20

ergo [1] - 1466:37

error [1] - 1518:2

errors [1] - 1560:19

especially [2] - 1453:6, 1496:42

established [3] - 1452:15, 1452:29, 1485:25

estimate [1] - 1505:39

et [1] - 1507:18

etc [1] - 1546:21

event [1] - 1465:45

events [9] - 1465:14, 1468:39, 1477:26, 1492:45, 1529:7, 1529:11, 1529:21, 1532:24, 1534:13

evidence [90] - 1446:3, 1449:43, 1450:45, 1451:17, 1452:30, 1461:45, 1462:6, 1462:9, 1462:13, 1463:28, 1466:34, 1468:2, 1468:20, 1471:23, 1471:42, 1474:18, 1478:46, 1480:4, 1482:28, 1482:37, 1483:13, 1483:38, 1487:7, 1490:15, 1490:32, 1490:36, 1490:45, 1491:10, 1491:21, 1492:5, 1492:12, 1492:15, 1493:5, 1493:12, 1493:40, 1494:1, 1494:10, 1496:7, 1496:10, 1496:26, 1498:10, 1503:15, 1503:23, 1503:34, 1506:4, 1511:40,

1513:25, 1515:27,
1516:13, 1518:3,
1523:7, 1523:16,
1523:24, 1523:33,
1524:22, 1527:3,
1528:4, 1529:10,
1529:21, 1529:36,
1531:43, 1532:1,
1532:18, 1533:41,
1534:7, 1535:12,
1535:29, 1535:33,
1535:35, 1535:44,
1536:7, 1541:47,
1542:3, 1544:36,
1545:31, 1552:40,
1553:35, 1554:25,
1558:24, 1561:33,
1562:6, 1562:13,
1569:20, 1569:21,
1570:15, 1570:16,
1570:19, 1570:24,
1572:33
Evidence [1] -
1452:13
evident [2] - 1481:9,
1546:6
evidently [1] - 1534:41
evolved [1] - 1447:28
evolving [1] - 1455:9
exact [4] - 1451:14,
1451:18, 1493:38,
1563:47
exactly [5] - 1463:19,
1470:43, 1480:19,
1497:45, 1565:26
examination [9] -
1446:17, 1456:39,
1491:17, 1494:3,
1497:47, 1498:5,
1513:33, 1549:42,
1555:39
EXAMINATION [10] -
1446:31, 1484:2,
1489:2, 1498:24,
1522:24, 1556:7,
1557:37, 1562:17,
1569:17, 1571:13
examination-in-chief
[1] - 1513:33
examinations [1] -
1563:23
examine [1] - 1490:9
examining [2] -
1497:14, 1535:30
exchange [2] -
1514:3, 1517:27
exchanges [1] -
1517:43
excitement [1] -
1464:19
excuse [6] - 1457:39,
1458:19, 1470:28,
1470:29, 1540:36
excused [3] - 1498:10,
1562:7, 1572:34
execute [1] - 1488:20
executed [3] -
1447:34, 1487:12,
1488:17
exhibit [2] - 1499:11,
1563:7
EXHIBIT [2] - 1499:13,
1563:9
exhibits [3] - 1446:3,
1446:8, 1548:10
exhorting [1] - 1464:4
exigencies [1] -
1536:9
existence [4] -
1464:47, 1465:10,
1490:35, 1513:11
existing [1] - 1458:15
expanded [1] - 1482:3
expect [5] - 1468:42,
1482:39, 1566:6,
1567:39, 1569:34
expectation [2] -
1566:20, 1566:23
experience [3] -
1448:24, 1553:31,
1553:36
experienced [1] -
1552:14
expert [4] - 1448:24,
1452:6, 1452:9,
1496:26
expert [1] - 1452:8
explain [5] - 1512:23,
1513:8, 1536:9,
1542:10, 1543:11
explained [4] -
1505:18, 1506:39,
1513:18, 1550:7
explanation [4] -
1491:19, 1492:45,
1495:33, 1496:17
explore [2] - 1525:12,
1530:31
explored [1] - 1491:20
exploring [1] - 1550:4
express [2] - 1452:6,
1551:25
expressing [2] -
1452:47, 1554:36
extant [1] - 1491:27
extent [4] - 1496:27,
1511:29, 1516:26,
1526:32
extracted [1] -
1447:15
extraordinary [3] -
1446:22, 1462:11,
1462:18
extremely [1] -
1568:23

F

Faber [3] - 1513:44,
1514:9, 1514:23
fabricated [1] -
1490:15
fabricating [1] -
1490:44
face [5] - 1452:24,
1477:26, 1478:36,
1495:5, 1534:41
fact [28] - 1452:32,
1462:9, 1470:36,
1471:4, 1471:11,
1472:27, 1487:42,
1488:6, 1490:35,
1490:37, 1497:39,
1503:35, 1506:1,
1509:23, 1510:42,
1524:47, 1528:25,
1530:18, 1535:21,
1543:46, 1547:26,
1553:15, 1553:17,
1553:31, 1554:26,
1559:17, 1559:21,
1559:22
factor [1] - 1487:40
facts [9] - 1448:5,
1451:36, 1452:19,
1524:24, 1525:3,
1525:8, 1528:46,
1535:26, 1543:44
factual [1] - 1449:29
failure [1] - 1477:42
fair [23] - 1448:1,
1448:6, 1450:39,
1450:43, 1452:41,
1461:35, 1484:20,
1502:32, 1505:22,
1509:37, 1512:42,
1512:46, 1523:4,
1524:3, 1524:4,
1525:1, 1526:39,
1539:26, 1540:6,
1542:9, 1542:28,
1552:3, 1564:36
fairly [9] - 1451:38,
1467:35, 1504:3,
1515:3, 1539:4,
1539:5, 1558:15,
1561:6, 1568:29
fairness [7] - 1459:22,
1462:9, 1462:16,
1462:46, 1478:44,
1490:47, 1525:13
fall [2] - 1552:16,
1552:36
fallen [1] - 1548:46
familiar [2] - 1484:45,
1495:23
familiarise [1] -
1526:43
fanciful [2] - 1465:15,
1538:47
fantasies [1] - 1547:14
far [8] - 1451:17,
1477:28, 1522:39,
1529:4, 1529:32,
1530:36, 1540:18,
1556:30
Father [1] - 1546:23
fault [1] - 1481:23
Fay [7] - 1461:47,
1462:8, 1462:30,
1462:32, 1462:34,
1462:39, 1562:20
FAY [2] - 1562:15,
1563:9
fearless [1] - 1487:35
February [2] -
1563:44, 1564:2
feed [1] - 1502:11
fell [1] - 1458:27
felt [1] - 1488:2
ferried [1] - 1537:28
few [9] - 1446:41,
1484:20, 1516:20,
1538:37, 1539:33,
1545:31, 1560:25,
1566:28, 1570:16
field [1] - 1448:25
file [50] - 1455:40,
1461:36, 1462:35,
1462:41, 1464:26,
1464:30, 1465:1,
1465:11, 1467:19,
1467:24, 1467:27,
1470:5, 1470:8,
1470:11, 1470:15,
1470:20, 1470:27,
1470:34, 1470:35,
1474:11, 1478:32,
1478:35, 1479:20,
1479:22, 1479:26,
1503:4, 1505:44,
1512:6, 1524:47,
1532:5, 1536:34,
1538:18, 1538:29,
1541:25, 1546:20,
1554:14, 1554:15,
1569:9, 1569:19,
1569:22, 1569:27,
1569:40, 1569:46,
1570:6, 1571:30,
1571:38, 1572:10,
1572:14, 1572:20
filtering [1] - 1516:35
final [4] - 1518:3,
1539:19, 1539:33,
1539:45
finalised [3] -
1495:14, 1495:34,
1496:20
finality [1] - 1546:25
finally [1] - 1451:45
fine [9] - 1447:7,
1456:11, 1456:16,
1457:19, 1498:35,
1514:38, 1514:44,
1535:23, 1536:17
finish [5] - 1472:16,
1511:14, 1513:32,
1542:17, 1545:21
finished [4] - 1481:43,
1503:46, 1509:15,
1553:26
firm [1] - 1533:38
first [35] - 1446:45,
1447:16, 1447:20,
1448:16, 1448:36,
1448:40, 1449:8,
1449:19, 1449:25,
1449:26, 1450:5,
1455:22, 1455:40,
1477:12, 1478:45,
1478:46, 1479:34,
1485:1, 1493:23,
1497:38, 1501:47,
1505:23, 1505:29,
1512:10, 1517:24,
1525:22, 1528:44,
1529:35, 1531:34,
1549:26, 1555:11,
1557:41, 1567:1
fit [4] - 1485:7,
1534:19, 1535:20,
1536:14
fitted [1] - 1516:27
five [11] - 1531:6,
1531:10, 1531:11,
1531:12, 1531:15,
1531:20, 1531:37,
1532:30, 1532:35,
1532:39, 1550:21
fix [1] - 1450:36
fixed [1] - 1534:37
fixes [1] - 1450:34
Fletcher [1] - 1546:23
flow [2] - 1459:5,
1558:34
flowed [1] - 1538:27
focused [2] - 1447:20,
1448:5
focusing [3] -

1447:21, 1470:24,
1498:46
folder [4] - 1457:9,
1482:45, 1487:22,
1548:17
folders [1] - 1524:15
follow [2] - 1545:39,
1557:6
followed [2] -
1516:26, 1540:21
following [4] -
1489:17, 1504:41,
1534:15, 1548:35
follows [1] - 1466:43
foolish [1] - 1468:10
foot [4] - 1464:11,
1527:7, 1527:37,
1529:44
footing [3] - 1449:5,
1496:25, 1555:38
FOR [1] - 1459:17
force [4] - 1503:11,
1511:20, 1557:15,
1570:11
Force [33] - 1447:32,
1448:39, 1450:16,
1461:35, 1479:39,
1479:47, 1480:12,
1485:5, 1487:19,
1490:27, 1491:46,
1496:2, 1508:16,
1509:14, 1509:18,
1509:45, 1509:47,
1510:3, 1510:15,
1510:18, 1510:21,
1512:1, 1512:34,
1514:20, 1523:11,
1524:2, 1524:24,
1526:15, 1543:33,
1544:7, 1547:23,
1555:26, 1562:22
Force's [1] - 1541:14
forces [1] - 1490:4
Forensic [1] - 1563:19
forensically [1] -
1491:5
forgive [1] - 1452:12
forgotten [1] - 1537:6
form [12] - 1458:10,
1460:16, 1462:4,
1473:12, 1482:36,
1484:13, 1485:26,
1501:20, 1537:8,
1539:19, 1543:46,
1545:11
formal [10] - 1448:25,
1448:38, 1450:11,
1468:32, 1469:21,
1474:3, 1474:7,
1523:8, 1537:36,
1538:15
formally [2] - 1483:20,
1538:10
format [1] - 1502:8
formed [2] - 1447:16,
1480:41
former [1] - 1517:7
forming [2] - 1451:43,
1459:12
forms [1] - 1464:3
formulated [1] -
1450:17
forums [1] - 1543:23
forward [7] - 1469:38,
1470:32, 1502:14,
1543:28, 1543:31,
1551:11, 1552:9
forwarded [1] - 1464:9
forwards [1] - 1552:34
foundation [2] -
1479:30, 1491:10
founded [1] - 1471:26
four [4] - 1449:26,
1469:36, 1481:5,
1481:21
fourth [1] - 1534:46
Fox [117] - 1462:26,
1467:38, 1469:14,
1469:32, 1469:41,
1470:41, 1471:3,
1471:10, 1471:21,
1472:10, 1472:28,
1474:15, 1474:25,
1474:27, 1474:33,
1474:42, 1480:13,
1480:15, 1480:23,
1480:35, 1480:42,
1481:3, 1481:17,
1481:19, 1481:28,
1483:14, 1483:15,
1483:26, 1486:36,
1489:7, 1489:31,
1490:16, 1490:17,
1490:28, 1490:29,
1492:7, 1493:21,
1494:9, 1495:6,
1496:2, 1496:6,
1496:11, 1496:16,
1496:25, 1503:9,
1503:22, 1505:40,
1506:16, 1507:15,
1507:17, 1507:33,
1509:46, 1510:18,
1510:22, 1510:25,
1510:32, 1510:43,
1511:1, 1511:6,
1511:8, 1511:19,
1511:26, 1511:36,
1512:7, 1512:11,
1512:37, 1513:12,
1513:24, 1513:35,
1513:43, 1514:5,
1515:9, 1515:14,
1515:23, 1516:32,
1516:36, 1517:24,
1517:28, 1517:30,
1517:35, 1518:3,
1518:9, 1531:18,
1531:25, 1531:33,
1531:38, 1532:36,
1536:38, 1537:6,
1539:36, 1540:2,
1540:16, 1540:19,
1540:23, 1540:28,
1541:15, 1541:25,
1541:43, 1542:4,
1542:13, 1542:36,
1543:22, 1544:11,
1544:25, 1544:38,
1545:7, 1545:32,
1547:19, 1550:3,
1550:42, 1551:30,
1552:12, 1567:17,
1569:2, 1569:9,
1571:27, 1571:32
Fox's [14] - 1465:21,
1469:11, 1481:23,
1483:30, 1509:45,
1511:34, 1513:20,
1516:14, 1516:22,
1531:12, 1542:27,
1542:46, 1567:22,
1567:46
frame [2] - 1505:44,
1515:35
frank [1] - 1487:35
frankly [1] - 1487:17
Freney [1] - 1487:7
fresh [3] - 1486:25,
1488:8, 1495:35
FRIDAY [1] - 1572:47
friend [13] - 1471:15,
1490:8, 1490:39,
1491:6, 1496:15,
1529:36, 1531:45,
1542:40, 1543:15,
1544:19, 1550:1,
1561:24, 1570:17
friend's [1] - 1459:5
friendships [1] -
1561:35
front [15] - 1481:35,
1481:44, 1482:2,
1482:7, 1482:8,
1488:25, 1489:37,
1489:44, 1497:3,
1525:45, 1529:39,
1549:27, 1556:11,
1556:14, 1571:15
frustrated [2] -
1484:14, 1484:15
FSG [5] - 1563:32,
1563:35, 1563:41,
1563:45, 1564:5
full [5] - 1498:26,
1502:35, 1524:23,
1551:12, 1562:19
full-time [1] - 1502:35
fully [1] - 1556:47
functions [1] -
1491:47
fundamental [1] -
1491:24
Further/Proposed [1]
- 1566:44
fuss [1] - 1464:19
future [2] - 1469:33,
1491:31

G

gained [1] - 1511:35
Gallen [1] - 1552:32
gangs [1] - 1499:46
GANT [1] - 1459:19
Gant [2] - 1456:5,
1457:15
gather [1] - 1456:25
gathered [1] - 1461:36
general [24] - 1451:17,
1466:1, 1466:13,
1466:16, 1467:45,
1488:35, 1488:36,
1488:38, 1493:11,
1493:16, 1493:18,
1499:20, 1500:27,
1501:8, 1502:6,
1523:12, 1527:9,
1528:36, 1528:38,
1529:30, 1530:11,
1542:26, 1542:30,
1560:28
generally [2] -
1450:32, 1496:33
genesis [1] - 1537:42
gentle [1] - 1491:4
gentle-person's [1] -
1491:4
gentleman [1] -
1542:24
genuine [1] - 1489:6
given [41] - 1448:23,
1452:13, 1452:22,
1456:10, 1456:33,
1459:12, 1461:45,
1464:2, 1482:28,
1489:29, 1492:7,
1492:11, 1492:13,
1493:40, 1494:9,
1494:41, 1497:37,
1497:39, 1502:46,
1503:1, 1503:5,
1503:16, 1503:23,
1503:29, 1506:4,
1509:47, 1511:30,
1515:27, 1516:13,
1527:26, 1527:47,
1528:1, 1533:40,
1535:45, 1539:10,
1542:9, 1550:21,
1552:14, 1553:42,
1558:23, 1559:17
Given [1] - 1449:21
glad [1] - 1451:41
gleaned [1] - 1523:15
gloss [1] - 1558:14
Gogarty [1] - 1546:24
GRAEME [1] -
1498:22
Graeme [1] - 1498:26
Gratton [3] - 1462:37,
1514:5, 1514:38
grant [1] - 1569:21
Grant [4] - 1490:17,
1492:18, 1493:28,
1493:33
grasping [1] - 1503:33
grateful [4] - 1450:43,
1460:13, 1526:46,
1528:45
gratuitous [3] -
1483:29, 1541:21,
1542:45
great [6] - 1464:19,
1468:41, 1488:1,
1505:20, 1552:28,
1558:9
green [10] - 1463:37,
1463:39, 1464:32,
1464:33, 1464:36,
1464:37, 1464:41,
1569:41, 1569:46,
1570:6
grips [1] - 1536:33
ground [1] - 1473:15
Group [1] - 1563:19
guess [5] - 1452:15,
1456:17, 1484:11,
1508:43, 1510:12
guy [2] - 1471:11,
1471:15
Gyles [2] - 1488:42,
1561:44
GYLES [2] - 1488:45,
1561:47

H

- Haggett** [1] - 1506:16
half [1] - 1531:34
hampering [2] - 1507:9, 1507:10
hamstrings [1] - 1507:6
hand [6] - 1477:23, 1478:37, 1494:30, 1533:23, 1562:42, 1571:39
handed [3] - 1483:4, 1540:20, 1542:5
handover [2] - 1451:2, 1507:18
handwritten [12] - 1506:6, 1508:47, 1529:17, 1533:45, 1534:6, 1534:9, 1534:12, 1535:8, 1535:18, 1535:39, 1536:12, 1536:13
handy [1] - 1453:14
hang [1] - 1558:40
happily [1] - 1544:7
happy [14] - 1452:15, 1455:42, 1456:41, 1457:6, 1483:3, 1535:6, 1538:29, 1539:19, 1540:10, 1550:28, 1553:36, 1560:3, 1560:4
head [1] - 1484:17
headed [1] - 1563:41
heading [2] - 1566:44, 1567:16
heads [4] - 1468:14, 1468:24, 1469:20, 1469:45
heads' [1] - 1469:9
hear [5] - 1451:41, 1453:13, 1462:14, 1531:46, 1536:35
heard [6] - 1511:40, 1533:12, 1534:43, 1535:40, 1535:47, 1536:6
hearing [1] - 1535:45
hearings [1] - 1527:22
heed [1] - 1453:1
held [7] - 1473:13, 1487:11, 1494:26, 1497:19, 1497:22, 1504:14, 1564:10
help [3] - 1452:38, 1464:33, 1535:9
helped [2] - 1458:15, 1473:12
helpful [2] - 1446:8, 1492:22
Herald [8] - 1471:2, 1481:35, 1482:3, 1489:18, 1506:43, 1508:17, 1556:27, 1565:25
Herald™ [1] - 1506:44
hesitant [1] - 1456:38
hidden [1] - 1463:28
high [2] - 1524:38, 1528:21
highly [1] - 1497:2
himself [4] - 1456:47, 1483:27, 1506:38, 1543:5
hindsight [1] - 1471:42
historic [1] - 1553:42
historical [1] - 1488:6
history [1] - 1494:37
hoc [2] - 1466:37, 1466:38
hold [2] - 1543:39, 1544:10
holding [1] - 1471:31
holdings [20] - 1449:44, 1482:19, 1482:32, 1482:34, 1482:36, 1485:27, 1485:36, 1486:16, 1487:17, 1511:5, 1513:5, 1516:1, 1516:3, 1524:24, 1525:6, 1526:14, 1537:30, 1541:43, 1547:7, 1549:34
holds [2] - 1545:32, 1545:45
hole [1] - 1507:11
honest [5] - 1512:13, 1539:22, 1544:11, 1545:24, 1561:40
honestly [1] - 1536:16
honourable [1] - 1559:42
hope [2] - 1463:18, 1533:31
housekeeping [1] - 1459:4
Humphrey [24] - 1446:12, 1446:14, 1446:33, 1457:8, 1457:39, 1470:29, 1487:16, 1497:15, 1497:17, 1498:9, 1509:39, 1509:40, 1524:14, 1540:26, 1554:14, 1554:16, 1568:39, 1569:1, 1569:8, 1569:28, 1571:23, 1572:4, 1572:10, 1572:20
HUMPHREY [2] - 1446:29, 1459:19
Humphrey's [1] - 1555:23
hunt [15] - 1446:10, 1457:42, 1462:7, 1462:10, 1462:35, 1463:2, 1463:5, 1464:22, 1465:19, 1465:22, 1465:24, 1491:14, 1492:4, 1492:43, 1493:17
Hunt [4] - 1446:39, 1459:15, 1498:2, 1498:7
HUNT [21] - 1446:1, 1446:12, 1446:16, 1457:5, 1457:21, 1457:25, 1459:4, 1459:11, 1461:19, 1466:19, 1490:8, 1490:39, 1491:16, 1491:36, 1492:22, 1492:29, 1492:33, 1493:1, 1494:1, 1497:14, 1498:5
hunt's [1] - 1524:13
Hunter [4] - 1500:3, 1500:8, 1500:14, 1571:31
hyperbole [1] - 1483:39
-
- idea** [13] - 1451:26, 1455:25, 1482:13, 1482:16, 1501:33, 1532:31, 1532:38, 1533:28, 1539:3, 1539:22, 1539:24, 1539:28, 1544:11
ideal [1] - 1557:26
identification [2] - 1459:7, 1479:16
identified [25] - 1447:14, 1448:18, 1448:44, 1449:25, 1449:30, 1452:20, 1458:9, 1459:13, 1460:13, 1460:14, 1463:36, 1464:19, 1464:36, 1470:31, 1473:7, 1478:3, 1478:43, 1527:16, 1530:17, 1532:42, 1532:44, 1532:45, 1535:13, 1545:31, 1546:3
identifies [5] - 1447:41, 1478:47, 1530:20, 1532:6, 1533:4
identify [12] - 1449:22, 1450:11, 1451:10, 1466:11, 1473:17, 1527:6, 1539:40, 1551:11, 1551:30, 1551:33, 1551:34, 1552:15
identifying [4] - 1470:34, 1479:17, 1554:8, 1554:40
ifs [1] - 1504:5
ignore [1] - 1471:3
ignoring [1] - 1471:7
image [1] - 1482:12
imagine [2] - 1539:3, 1539:4
immediate [1] - 1524:39
immediately [2] - 1508:34, 1557:6
impact [1] - 1501:23
impacted [1] - 1488:7
impacts [1] - 1501:24
implemented [1] - 1538:38
implicit [2] - 1450:44, 1471:22
impliedly [1] - 1485:13
important [7] - 1484:18, 1487:40, 1491:47, 1492:34, 1493:7, 1508:20, 1517:22
impossible [1] - 1472:47
impression [2] - 1527:41, 1560:1
improper [1] - 1477:46
IN [1] - 1446:16
include [2] - 1507:28, 1539:34
included [3] - 1451:11, 1513:3, 1514:3
including [5] - 1456:47, 1499:33, 1510:33, 1512:37, 1530:40
inclusions [1] - 1550:24
inclusive [3] - 1522:34, 1529:1, 1549:7
inconsistency [2] - 1534:28, 1536:10
incorrect [3] - 1550:1, 1550:43, 1559:37
indebted [1] - 1555:44
indeed [15] - 1447:4, 1451:7, 1452:24, 1458:8, 1470:20, 1471:38, 1489:4, 1490:14, 1490:17, 1522:32, 1524:28, 1525:8, 1525:12, 1533:22, 1572:13
independent [7] - 1510:36, 1565:40, 1572:3, 1572:5, 1572:8, 1572:15, 1572:18
indicate [14] - 1495:6, 1526:24, 1531:40, 1532:10, 1533:18, 1552:30, 1554:43, 1555:38, 1564:19, 1565:30, 1566:17, 1567:20, 1568:14, 1568:36
indicated [8] - 1449:44, 1462:10, 1470:47, 1478:37, 1493:31, 1507:34, 1533:37, 1545:32
indicates [5] - 1456:26, 1458:13, 1505:45, 1531:2, 1552:31
indicating [2] - 1567:26, 1568:46
indicator [1] - 1488:29
industry [2] - 1457:35, 1539:17
inference [3] - 1555:28, 1559:30, 1559:37
infers [1] - 1468:18
informal [1] - 1540:1
informally [1] - 1538:9
information [38] - 1464:9, 1466:5, 1466:10, 1468:10, 1471:2, 1502:11, 1508:2, 1508:16, 1510:41, 1510:47, 1511:27, 1511:35, 1511:41, 1511:45, 1511:47, 1513:45, 1514:19, 1516:11, 1523:12, 1523:15, 1525:31, 1525:45, 1526:26, 1536:44, 1539:36, 1555:27, 1555:30, 1558:10

1558:16, 1558:34, 1564:25, 1564:27, 1565:4, 1565:13, 1566:8, 1566:40, 1569:35, 1569:36
informed [2] - 1453:5, 1517:24
informs [1] - 1513:2
infractions [1] - 1547:13
initial [4] - 1485:27, 1513:39, 1557:15, 1563:35
initiate [2] - 1485:42, 1503:10
initiated [2] - 1486:11, 1571:27
inject [1] - 1483:27
injunction [1] - 1524:13
input [3] - 1451:2, 1497:29, 1497:40
inquiries [2] - 1485:26, 1485:27
INQUIRY [1] - 1446:12
inquiry [7] - 1493:41, 1511:31, 1511:40, 1511:47, 1540:22, 1562:38, 1566:35
insensitive [1] - 1493:17
inside [1] - 1570:11
inspector [22] - 1447:14, 1469:3, 1474:14, 1498:29, 1498:34, 1498:47, 1500:30, 1517:7, 1522:26, 1532:29, 1534:28, 1540:36, 1542:22, 1550:29, 1560:11, 1561:9, 1562:22, 1563:11, 1563:29, 1569:12, 1569:19, 1572:33
INSPECTOR [3] - 1459:18, 1499:13, 1563:9
Inspector [122] - 1446:12, 1446:33, 1450:7, 1451:3, 1451:20, 1451:36, 1452:20, 1457:8, 1457:39, 1461:42, 1461:47, 1462:2, 1464:4, 1464:20, 1464:23, 1464:25, 1464:30, 1464:46, 1465:6, 1465:15, 1465:21, 1466:6, 1467:38, 1469:5, 1469:6, 1469:11, 1470:29, 1470:41, 1471:3, 1471:10, 1471:21, 1472:10, 1479:27, 1481:3, 1481:22, 1486:10, 1489:7, 1493:21, 1494:9, 1494:31, 1495:6, 1496:2, 1496:11, 1496:16, 1497:15, 1497:17, 1498:9, 1498:16, 1499:10, 1502:39, 1503:2, 1503:22, 1503:45, 1505:39, 1507:33, 1509:40, 1509:45, 1509:46, 1510:18, 1510:25, 1510:32, 1511:1, 1511:6, 1511:19, 1511:26, 1512:7, 1512:11, 1513:12, 1513:35, 1515:9, 1515:14, 1515:23, 1516:14, 1516:22, 1516:32, 1517:4, 1517:28, 1517:30, 1517:35, 1518:9, 1523:17, 1524:13, 1527:2, 1527:9, 1527:10, 1528:3, 1528:33, 1528:35, 1530:20, 1531:12, 1531:18, 1531:25, 1531:33, 1531:38, 1532:36, 1533:5, 1533:37, 1537:41, 1538:2, 1539:36, 1540:2, 1540:26, 1541:43, 1542:4, 1542:45, 1542:46, 1543:4, 1544:38, 1545:7, 1545:32, 1550:3, 1550:42, 1556:2, 1556:14, 1557:39, 1562:7, 1562:12, 1563:6, 1567:17, 1567:46, 1571:27
inspector's [1] - 1562:13
instance [3] - 1477:13, 1557:41, 1568:27
instances [2] - 1548:5, 1564:37
instituted [1] - 1477:13
instructed [1] - 1505:12
instruction [2] - 1527:26, 1561:12
instructs [1] - 1561:10
integrity [2] - 1474:19, 1493:7
intended [3] - 1554:26, 1554:30, 1554:33
intending [1] - 1566:27
intention [6] - 1467:37, 1467:43, 1468:5, 1510:21, 1526:42, 1549:18
intentions [1] - 1469:16
intents [2] - 1510:9, 1539:29
interest [2] - 1478:11, 1541:6
interests [1] - 1491:45
interfere [1] - 1514:40
internal [3] - 1462:28, 1488:23, 1538:21
interoffice [1] - 1537:9
interpose [1] - 1462:21
interpret [3] - 1466:40, 1466:41, 1508:41
interpretation [3] - 1468:19, 1469:24, 1469:26
interrogation [1] - 1541:42
interrupt [1] - 1459:5
interrupted [2] - 1542:24, 1542:28
interruptions [1] - 1446:42
interview [10] - 1461:40, 1462:26, 1486:6, 1486:25, 1490:28, 1493:21, 1493:24, 1539:37, 1556:37
interviewed [10] - 1451:16, 1462:27, 1490:16, 1492:7, 1542:19, 1543:24, 1543:26, 1543:47, 1550:19
interviewed/ debriefed [1] - 1540:3
interviewing [2] - 1490:17, 1493:20
interviews [3] - 1545:12, 1545:13, 1545:33
intimated [1] - 1516:36
intimates [1] - 1549:22
intimating [1] - 1545:11
INTO [1] - 1446:14
intricacies [2] - 1496:31, 1525:29
intricate [1] - 1488:9
introduced [1] - 1486:12
invention [1] - 1474:20
inverted [2] - 1561:1, 1561:37
investigated [4] - 1515:44, 1515:47, 1516:7, 1556:47
investigating [2] - 1499:32, 1552:24
INVESTIGATION [1] - 1446:14
investigation [74] - 1448:1, 1448:12, 1450:31, 1451:15, 1455:39, 1462:28, 1467:33, 1467:39, 1468:3, 1474:20, 1480:36, 1482:9, 1482:34, 1484:36, 1485:9, 1485:18, 1485:40, 1488:9, 1489:36, 1489:37, 1489:46, 1490:4, 1490:19, 1491:30, 1493:26, 1493:32, 1499:25, 1499:29, 1499:33, 1500:43, 1501:10, 1501:32, 1502:12, 1502:15, 1502:22, 1502:26, 1503:11, 1503:43, 1506:23, 1506:25, 1506:31, 1506:47, 1507:35, 1507:37, 1507:45, 1507:47, 1511:28, 1512:37, 1514:40, 1516:19, 1516:23, 1526:43, 1527:15, 1534:33, 1537:42, 1537:43, 1538:3, 1538:7, 1538:14, 1538:28, 1538:30, 1538:43, 1539:12, 1539:18, 1543:29, 1546:24, 1552:13, 1553:28, 1553:30, 1553:38, 1553:45, 1558:36
investigation's [1] - 1492:6
investigations [13] - 1490:3, 1490:4, 1498:45, 1499:26, 1499:27, 1499:45, 1500:27, 1501:9, 1512:33, 1514:20, 1538:21, 1538:22, 1553:43
investigative [8] - 1488:18, 1488:19, 1489:41, 1500:21, 1500:47, 1501:5, 1509:32, 1557:27
investigator [1] - 1510:1
investigator's [28] - 1504:33, 1505:2, 1517:12, 1524:18, 1529:15, 1529:27, 1529:37, 1530:12, 1531:31, 1532:42, 1532:44, 1533:3, 1533:10, 1533:44, 1534:8, 1534:13, 1534:29, 1534:39, 1535:31, 1551:7, 1554:25, 1558:13, 1558:39, 1559:2, 1559:28, 1560:26, 1561:23, 1561:29
investigators [1] - 1552:14
investigatory [1] - 1509:37
involve [1] - 1501:22
involved [16] - 1449:37, 1450:40, 1451:47, 1452:5, 1469:47, 1502:21, 1506:25, 1506:31, 1507:34, 1507:36, 1507:44, 1507:47, 1527:21, 1567:21, 1569:40, 1569:45
involvement [7] - 1509:31, 1509:45, 1542:7, 1566:29, 1567:23, 1567:25, 1567:26
involving [2] - 1499:46, 1553:43
Irving [5] - 1483:46, 1488:42, 1557:35, 1561:44, 1570:38
IRVING [9] - 1484:2, 1484:4, 1488:40, 1557:37, 1557:39, 1559:7, 1560:43, 1561:42, 1570:40

issue [23] - 1464:3,
1486:5, 1487:18,
1491:17, 1492:33,
1492:34, 1502:9,
1506:32, 1506:37,
1506:40, 1528:38,
1539:23, 1539:26,
1541:9, 1545:23,
1554:8, 1554:40,
1555:23, 1555:24,
1555:26, 1564:26,
1569:19, 1572:9

issued [1] - 1509:8

issues [9] - 1455:8,
1506:24, 1514:8,
1545:15, 1545:16,
1554:44, 1555:11,
1560:14, 1560:19

item [2] - 1446:5,
1453:4

itself [4] - 1449:3,
1464:8, 1496:8,
1566:11

J

Jacob [5] - 1492:9,
1492:20, 1493:30,
1538:3, 1538:26

Jacobs [1] - 1537:41

Jeff [1] - 1449:43

Jeffrey [1] - 1517:13

jersey [1] - 1470:21

Jessica [1] - 1446:43

Joanne [9] - 1461:47,
1462:12, 1462:41,
1465:7, 1481:25,
1525:5, 1525:14,
1565:21, 1566:19

job [14] - 1452:8,
1458:47, 1460:10,
1474:45, 1479:39,
1481:6, 1525:40,
1547:8, 1552:31,
1553:28, 1553:32,
1553:33, 1560:8,
1564:13

jobs [1] - 1458:17

JOHN [1] - 1498:22

John [1] - 1498:26

join [1] - 1563:26

joined [2] - 1532:35,
1563:19

journalist [5] -
1461:46, 1557:40,
1557:44, 1559:47,
1565:24

Julia [1] - 1446:37

July [6] - 1451:29,

1455:7, 1455:20,
1455:45, 1558:24,
1559:15

JUNE [1] - 1572:47

June [1] - 1446:30,

1455:7, 1455:14,
1455:16, 1455:17,
1455:23, 1455:44,
1458:21, 1460:16,
1562:39, 1563:6

Justin [1] - 1504:35

K

keep [6] - 1452:8,
1452:26, 1491:4,
1501:21, 1502:9,
1506:34

keeping [1] - 1482:2

KELL [7] - 1562:17,
1562:19, 1562:37,
1563:3, 1563:11,
1572:29, 1572:39

Kell [5] - 1446:38,
1446:6, 1562:13,
1563:5, 1572:27

kept [1] - 1514:21

kind [2] - 1493:46,
1494:34

kindly [5] - 1522:31,
1522:38, 1529:2,
1544:33, 1550:28

knock [2] - 1547:13,
1547:18

knowing [1] - 1466:27

knowledge [29] -
1452:14, 1452:37,
1455:36, 1466:20,
1479:35, 1479:37,
1479:46, 1480:11,
1480:13, 1480:15,
1480:18, 1485:6,
1487:4, 1493:22,
1493:25, 1495:27,
1495:47, 1496:39,
1507:15, 1507:17,
1511:11, 1511:27,
1523:11, 1525:3,
1525:29, 1551:14,
1551:19, 1551:33,
1566:36

known [3] - 1464:47,
1465:10, 1558:19

knows [2] - 1490:40,
1542:26

L

label [2] - 1479:25,

1479:26
labours [1] - 1491:26

LAC [16] - 1450:35,
1458:22, 1458:33,
1458:36, 1459:1,
1459:32, 1460:17,
1470:12, 1477:14,
1477:22, 1479:40,
1480:34, 1495:19,
1500:43, 1554:4,
1571:41

lack [10] - 1542:33,
1542:46, 1543:9,
1546:6, 1546:28,
1546:35, 1547:28,
1548:10, 1550:17,
1550:41

LACs [1] - 1528:37

Lake [1] - 1528:40

land [1] - 1558:20

Lantle [69] - 1447:33,
1448:39, 1450:16,
1461:36, 1462:26,
1479:39, 1479:47,
1480:12, 1480:18,
1482:19, 1482:20,
1483:15, 1483:18,
1483:22, 1483:34,
1484:5, 1484:8,
1484:16, 1484:17,
1484:21, 1485:25,
1485:46, 1486:2,
1486:17, 1487:19,
1490:27, 1501:9,
1501:13, 1501:32,
1502:15, 1502:21,
1502:26, 1509:14,
1509:18, 1509:21,
1509:46, 1509:47,
1510:15, 1510:19,
1510:21, 1510:33,
1510:37, 1512:1,
1512:34, 1512:42,
1513:5, 1514:20,
1516:23, 1516:28,
1517:45, 1523:11,
1524:2, 1524:24,
1525:9, 1526:15,
1541:25, 1542:8,
1543:33, 1544:8,
1547:8, 1549:37,
1555:26, 1559:22,
1559:24, 1560:12,
1560:22, 1561:12,
1561:13

large [1] - 1502:7

last [16] - 1446:5,
1446:17, 1461:26,
1470:32, 1472:6,
1478:41, 1505:3,

1515:43, 1515:46,
1516:6, 1530:19,
1542:35, 1551:12,
1552:32, 1560:39,
1560:45

lasted [2] - 1532:20,
1532:25

lastly [1] - 1469:32

late [13] - 1455:17,
1505:17, 1505:19,
1523:25, 1524:23,
1525:26, 1526:10,
1527:3, 1528:17,
1528:25, 1528:34,
1539:9, 1539:17

Latin [2] - 1466:41,
1466:46

law [1] - 1552:29

lawyers [2] - 1448:4,
1498:38

lay [1] - 1558:20

lead [1] - 1522:47

lead-up [1] - 1522:47

leading [2] - 1523:31,
1523:34

leak [4] - 1473:9,
1480:35, 1508:22,
1552:4

leakages [2] -
1489:12, 1489:13

leaked [6] - 1472:21,
1472:26, 1472:27,
1472:38, 1472:45,
1473:2

leaker [3] - 1471:22,
1472:11, 1481:4

leaking [6] - 1472:36,
1508:16, 1525:31,
1551:26, 1555:27

learned [9] - 1491:6,
1529:36, 1531:45,
1535:30, 1542:40,
1543:15, 1544:19,
1549:47, 1570:17

least [9] - 1450:46,
1455:24, 1455:46,
1482:19, 1492:11,
1517:18, 1529:32,
1550:22, 1565:30

leave [8] - 1458:43,
1469:36, 1505:43,
1556:3, 1557:16,
1564:12, 1564:13,
1567:32

leaves [1] - 1531:19

led [5] - 1447:25,
1451:43, 1465:14,
1508:2, 1529:35

leeway [1] - 1539:7

left [9] - 1456:32,

1482:40, 1531:7,
1531:11, 1531:21,
1531:37, 1531:38,
1532:36, 1556:15

leg [3] - 1481:5,
1481:17, 1481:19

legal [2] - 1492:29,
1562:38

legs [1] - 1524:34

leisure [1] - 1502:46

lengthy [2] - 1447:3,
1545:7

less [1] - 1543:34

letter [2] - 1450:15,
1486:9

letterhead [2] -
1478:40, 1478:47

level [6] - 1501:15,
1501:18, 1501:22,
1501:39, 1510:7,
1518:8

liaison [1] - 1564:26

Liaison [1] - 1464:14

life [2] - 1490:36,
1556:12

light [3] - 1474:11,
1559:28, 1559:36

likely [3] - 1465:18,
1539:8, 1554:35

limitation [1] - 1535:2

limitations [1] -
1496:26

limited [9] - 1479:36,
1479:47, 1480:11,
1480:17, 1523:11,
1523:13, 1526:25,
1542:7, 1551:20

line [26] - 1453:17,
1453:18, 1460:20,
1460:21, 1465:45,
1469:7, 1471:37,
1473:23, 1473:24,
1475:2, 1475:3,
1478:14, 1481:23,
1491:43, 1492:35,
1502:36, 1504:14,
1510:10, 1510:13,
1518:15, 1518:16,
1520:46, 1520:47,
1559:29, 1570:47,
1571:1

linear [1] - 1483:5

lines [5] - 1484:6,
1493:18, 1511:31,
1511:47, 1540:22

link [2] - 1564:36,
1564:39

list [1] - 1524:38

listen [1] - 1548:3

lister [1] - 1553:31

Little's [3] - 1449:43, 1452:29, 1539:17
live [2] - 1491:27, 1535:23
livid [1] - 1480:8
local [17] - 1495:30, 1500:38, 1501:1, 1501:11, 1501:12, 1501:14, 1501:17, 1501:22, 1501:24, 1501:29, 1501:34, 1501:39, 1564:37, 1564:47, 1565:5, 1566:39, 1568:18
Local [9] - 1500:8, 1500:14, 1500:34, 1502:17, 1504:4, 1523:10, 1527:13, 1566:9, 1567:42
located [1] - 1562:29
logically [1] - 1534:42
LONERGAN [32] - 1498:16, 1498:24, 1498:26, 1499:8, 1499:16, 1516:40, 1517:4, 1520:42, 1531:10, 1531:23, 1541:34, 1542:3, 1542:24, 1543:9, 1543:41, 1545:1, 1548:41, 1549:1, 1549:10, 1550:6, 1550:21, 1550:34, 1554:22, 1555:3, 1555:46, 1556:7, 1556:9, 1557:33, 1559:2, 1560:39, 1562:4, 1562:11
Lonerган [8] - 1446:37, 1446:6, 1520:44, 1529:36, 1531:45, 1549:13, 1554:28, 1557:35
Lonerган's [1] - 1544:8
look [28] - 1448:36, 1456:11, 1456:46, 1464:4, 1469:38, 1470:5, 1470:10, 1470:32, 1481:24, 1483:5, 1498:46, 1501:36, 1503:14, 1512:24, 1514:2, 1517:36, 1526:28, 1529:47, 1533:30, 1536:24, 1540:37, 1547:30, 1548:17, 1549:6, 1557:17, 1559:39, 1566:42, 1567:15
Look [1] - 1515:14
looked [2] - 1503:38, 1525:26
looking [13] - 1456:14, 1469:46, 1494:32, 1495:46, 1503:30, 1513:15, 1515:42, 1546:16, 1547:29, 1547:37, 1548:27, 1561:16, 1566:6
lose [2] - 1535:25, 1557:27
lost [5] - 1508:28, 1508:30, 1547:15, 1548:4, 1548:7
Lower [3] - 1500:3, 1500:8, 1500:14
luncheon [2] - 1531:44, 1535:29
LUNCHEON [1] - 1516:45

M

Ma'am [19] - 1503:1, 1504:11, 1504:23, 1504:24, 1504:27, 1504:28, 1505:19, 1512:30, 1512:45, 1513:3, 1527:9, 1527:10, 1527:20, 1527:41, 1528:2, 1528:22, 1541:8, 1554:24, 1554:26
ma'am [1] - 1504:16
ma'am's [1] - 1508:22
Macquarie [1] - 1528:40
macro [1] - 1478:39
madam [2] - 1491:16, 1504:38
maintain [1] - 1466:45
maintaining [1] - 1534:29
MAITLAND [1] - 1446:18
Maitland [1] - 1487:11
MAITLAND-NEWCASTLE [1] - 1446:18
Maitland-Newcastle [1] - 1487:11
major [3] - 1480:38, 1490:3, 1503:11
man [3] - 1478:11, 1547:12, 1547:18
manage [3] - 1470:37, 1501:14, 1564:29
managed [4] - 1487:18, 1501:10, 1501:14, 1501:39
management [6] - 1482:30, 1494:26, 1501:2, 1501:8, 1506:26, 1506:31
Manager [2] - 1469:33, 1571:40
manager [25] - 1450:7, 1459:40, 1460:6, 1482:20, 1500:7, 1500:10, 1500:11, 1500:13, 1500:18, 1500:22, 1502:2, 1502:17, 1502:31, 1502:35, 1509:15, 1509:24, 1509:35, 1510:6, 1510:9, 1510:13, 1510:47, 1516:20, 1517:44, 1523:9, 1526:13
manager's [5] - 1500:34, 1500:38, 1500:41, 1500:46, 1502:5
managerial [4] - 1487:43, 1509:33, 1526:13, 1555:25
managers [2] - 1459:41, 1524:30
managing [4] - 1501:4, 1501:20, 1556:35, 1564:23
mandate [1] - 1485:35
manila [1] - 1487:22
March [19] - 1460:8, 1498:38, 1502:16, 1509:13, 1509:22, 1510:30, 1510:47, 1511:6, 1511:10, 1511:22, 1511:30, 1513:39, 1523:10, 1524:31, 1526:21, 1536:34, 1536:39, 1537:18, 1547:8
Margaret [1] - 1446:34
marked [7] - 1450:14, 1459:6, 1461:16, 1499:11, 1524:10, 1533:31, 1563:6
married [1] - 1553:12
material [34] - 1447:15, 1457:9, 1457:36, 1457:40, 1462:47, 1466:14, 1468:2, 1468:20, 1468:21, 1473:8, 1487:39, 1490:9, 1491:19, 1491:28, 1491:36, 1491:38, 1492:14, 1492:22, 1492:31, 1492:36, 1493:3, 1503:31, 1511:21, 1513:2, 1513:4, 1522:46, 1525:33, 1530:4, 1533:26, 1541:44, 1542:5, 1556:10, 1559:15, 1559:17
materially [1] - 1449:14
materials [11] - 1470:5, 1470:27, 1477:13, 1523:16, 1523:34, 1524:24, 1528:1, 1528:46, 1529:2, 1537:8, 1545:46
matter [39] - 1447:24, 1464:9, 1464:16, 1469:39, 1470:33, 1470:34, 1485:28, 1488:6, 1488:37, 1489:36, 1490:47, 1491:26, 1493:6, 1496:17, 1502:8, 1504:5, 1504:26, 1507:13, 1510:32, 1514:33, 1526:42, 1527:31, 1527:39, 1530:11, 1535:21, 1553:15, 1555:47, 1556:3, 1556:46, 1557:14, 1557:24, 1557:30, 1557:40, 1567:5, 1567:32, 1567:37, 1568:7, 1568:40, 1569:32
MATTERS [1] - 1446:14
matters [32] - 1447:22, 1447:38, 1447:39, 1450:32, 1451:18, 1452:19, 1473:11, 1480:11, 1480:13, 1480:15, 1498:44, 1499:33, 1505:1, 1510:33, 1514:10, 1515:41, 1516:6, 1516:21, 1517:11, 1517:29, 1524:40, 1528:10, 1532:6, 1532:20, 1532:42, 1535:31, 1535:45, 1541:6, 1552:27, 1552:28, 1556:47, 1560:25
Max [2] - 1508:35, 1508:38
McAlinden [2] - 1546:21, 1556:31
McCarthy [49] - 1446:4, 1461:47, 1462:12, 1462:21, 1462:42, 1464:27, 1465:7, 1465:10, 1472:28, 1481:13, 1481:21, 1481:25, 1484:21, 1486:35, 1486:38, 1486:45, 1489:6, 1511:35, 1511:39, 1511:40, 1511:45, 1511:46, 1525:5, 1525:14, 1526:23, 1526:33, 1540:17, 1551:26, 1551:34, 1556:42, 1557:29, 1558:4, 1558:35, 1559:8, 1559:39, 1559:46, 1560:26, 1561:6, 1561:32, 1565:21, 1565:28, 1565:34, 1566:5, 1566:7, 1566:19, 1566:27
McCarthy's [1] - 1487:19
McLeod [1] - 1551:31
mean [18] - 1455:7, 1467:47, 1469:41, 1477:36, 1481:8, 1494:19, 1501:28, 1508:26, 1508:46, 1510:4, 1510:10, 1510:20, 1530:40, 1536:47, 1548:29, 1552:21, 1552:35, 1553:30
meaning [1] - 1483:25
means [10] - 1456:37, 1466:43, 1469:23, 1470:27, 1470:34, 1471:15, 1509:35, 1537:2, 1544:15, 1552:22
meant [1] - 1457:21
mechanics [3] - 1496:7, 1496:24, 1496:27
media [14] - 1446:3, 1477:47, 1481:39, 1489:32, 1489:45, 1508:21, 1508:32, 1511:41, 1541:6, 1553:46, 1554:5, 1554:42, 1554:47, 1565:13
meet [1] - 1536:8
meeting [9] - 1462:23, 1462:35,

1477:31, 1477:41, 1478:4, 1478:10, 1491:17, 1493:14, 1494:26, 1497:18, 1497:22, 1497:25, 1497:30, 1497:34, 1497:38, 1497:40, 1497:43, 1497:45, 1501:42, 1502:1, 1502:25, 1502:30, 1502:33, 1502:34, 1502:43, 1504:1, 1504:2, 1504:13, 1504:45, 1505:4, 1505:11, 1505:15, 1505:25, 1505:29, 1505:33, 1505:40, 1505:43, 1506:9, 1506:15, 1507:24, 1507:28, 1507:40, 1507:45, 1508:8, 1508:11, 1508:20, 1508:31, 1509:19, 1523:1, 1525:34, 1525:37, 1527:26, 1527:27, 1527:42, 1527:47, 1528:8, 1528:14, 1528:23, 1528:33, 1528:46, 1529:29, 1530:12, 1530:13, 1530:21, 1531:6, 1531:13, 1531:15, 1531:34, 1531:35, 1531:36, 1531:38, 1531:39, 1532:16, 1532:31, 1532:32, 1532:35, 1532:46, 1533:5, 1533:14, 1533:16, 1533:18, 1534:18, 1534:44, 1535:19, 1535:41, 1536:13, 1537:6, 1537:30, 1537:40, 1538:31, 1538:32, 1539:2, 1539:29, 1539:32, 1541:26, 1541:30, 1542:16, 1549:37

meetings [3] - 1486:24, 1530:14, 1564:24

Melbourne [2] - 1478:17, 1478:30

member [3] - 1489:31, 1514:34, 1543:32

members [7] - 1455:26, 1489:39, 1543:26, 1544:1, 1545:13, 1557:15

memo [8] - 1484:44, 1508:47, 1512:10, 1512:25, 1513:11, 1513:16, 1513:18, 1513:23

memoire [1] - 1456:33

memorandum [3] - 1470:41, 1483:16, 1525:15

memory [6] - 1458:1, 1464:34, 1489:25, 1493:38, 1525:25, 1526:9

men [1] - 1553:12

mention [4] - 1452:40, 1452:46, 1463:2, 1508:17

mentioned [3] - 1511:39, 1569:10, 1569:20

merging [1] - 1495:41

merits [1] - 1550:24

message [5] - 1527:42, 1528:7, 1528:20, 1528:28, 1568:31

MFI [2] - 1459:17, 1461:29

MFI7 [3] - 1459:15, 1461:17, 1461:31

mid-70s [1] - 1452:24

middle [1] - 1503:17

midst [1] - 1446:16

might [21] - 1448:13, 1457:36, 1458:42, 1461:24, 1461:35, 1464:37, 1488:10, 1491:37, 1491:41, 1491:42, 1523:38, 1523:39, 1532:1, 1539:9, 1552:25, 1555:38, 1555:39, 1556:19, 1559:23, 1560:13, 1561:33

mind [13] - 1446:41, 1458:15, 1458:41, 1467:9, 1468:6, 1470:16, 1487:18, 1489:23, 1522:33, 1525:46, 1526:47, 1529:39, 1571:19

minds [1] - 1466:21

mine [6] - 1469:24, 1471:4, 1474:46, 1548:12, 1548:15, 1548:37

minefield [1] - 1463:17

ministerial [10] - 1463:38, 1464:24, 1464:42, 1464:44, 1467:19, 1467:24, 1467:27, 1569:40, 1569:45, 1570:6

Ministerial [1] - 1464:14

ministerial" [1] - 1464:43

minor [1] - 1539:33

minutes [17] - 1494:25, 1504:45, 1516:41, 1531:6, 1531:11, 1531:12, 1531:15, 1531:20, 1531:37, 1532:30, 1532:36, 1532:39, 1545:31, 1550:22, 1570:16

miscarry [1] - 1491:46

missed [7] - 1468:17, 1505:11, 1505:15, 1505:20, 1539:13, 1541:38, 1546:26

misunderstanding [1] - 1456:19

Mitchell [11] - 1469:6, 1477:35, 1478:7, 1478:16, 1478:19, 1497:34, 1505:35, 1506:15, 1506:24, 1508:35, 1508:38

Mitchell's [1] - 1497:40

moment [9] - 1457:12, 1457:40, 1493:29, 1522:34, 1526:12, 1534:7, 1535:24, 1546:40, 1560:34

moments [1] - 1543:39

momentum [2] - 1487:44, 1489:42

Monday [2] - 1458:27, 1523:45

month [1] - 1516:20

months [7] - 1481:6, 1481:21, 1484:32, 1487:39, 1488:1, 1488:5, 1488:10

moot [1] - 1501:37

morning [12] - 1446:1, 1446:7, 1446:14, 1446:35, 1523:34, 1531:43, 1535:13, 1535:44, 1536:7, 1548:43, 1572:41, 1572:44

Morrison [2] - 1561:14

most [9] - 1469:15, 1498:34, 1540:16, 1552:14, 1552:26, 1553:9, 1553:11, 1553:20, 1553:27

motive [1] - 1474:47

motives [1] - 1559:41

motorcycle [1] - 1499:46

move [4] - 1446:44, 1522:31, 1536:22, 1540:23

moved [5] - 1448:7, 1542:35, 1542:40, 1563:45, 1564:5

movements [1] - 1456:47

MR [162] - 1446:1, 1446:12, 1446:16, 1446:22, 1446:27, 1446:31, 1446:33, 1455:6, 1455:31, 1455:44, 1456:19, 1456:36, 1457:2, 1457:5, 1457:21, 1457:25, 1457:33, 1457:45, 1459:4, 1459:11, 1459:21, 1461:15, 1461:19, 1461:24, 1461:29, 1461:33, 1462:45, 1463:7, 1463:12, 1463:16, 1463:25, 1465:24, 1465:30, 1465:34, 1465:37, 1465:41, 1466:19, 1466:23, 1466:27, 1466:32, 1466:37, 1466:40, 1466:43, 1466:45, 1467:5, 1471:14, 1471:20, 1471:37, 1472:3, 1472:9, 1472:16, 1472:24, 1472:33, 1472:41, 1472:43, 1473:4, 1477:12, 1482:11, 1483:8, 1483:13, 1483:42, 1484:2, 1484:4, 1488:40, 1488:45, 1489:2, 1489:4, 1490:8, 1490:12, 1490:24, 1490:32, 1490:39, 1490:42, 1491:3, 1491:16, 1491:36, 1492:4, 1492:22, 1492:29, 1492:33, 1492:41, 1493:1, 1493:16, 1494:1, 1494:6, 1494:17, 1494:21, 1494:24, 1496:5, 1496:13, 1496:15, 1496:22, 1496:39, 1497:10, 1497:14, 1497:17, 1497:47, 1498:5, 1498:18, 1522:24, 1522:26, 1531:15, 1531:27, 1531:31, 1534:46, 1535:12, 1536:21, 1541:38, 1541:40, 1541:42, 1541:47, 1542:12, 1542:30, 1542:35, 1543:2, 1543:7, 1543:15, 1543:37, 1544:13, 1544:17, 1544:24, 1544:45, 1545:6, 1548:39, 1548:45, 1549:5, 1549:15, 1549:40, 1549:47, 1550:3, 1550:9, 1550:28, 1550:38, 1552:7, 1554:30, 1555:17, 1555:33, 1555:38, 1555:44, 1557:37, 1557:39, 1559:7, 1560:43, 1561:42, 1561:47, 1562:2, 1562:17, 1562:19, 1562:32, 1562:37, 1563:3, 1563:11, 1569:17, 1569:19, 1570:35, 1570:40, 1570:44, 1571:13, 1571:15, 1572:24, 1572:29, 1572:39

MS [32] - 1498:16, 1498:24, 1498:26, 1499:8, 1499:16, 1516:40, 1517:4, 1520:42, 1531:10, 1531:23, 1541:34, 1542:3, 1542:24, 1543:9, 1543:41, 1545:1, 1548:41, 1549:1, 1549:10, 1550:6, 1550:21, 1550:34, 1554:22, 1555:3, 1555:46, 1556:7, 1556:9, 1557:33, 1559:2, 1560:39, 1562:4, 1562:11

muddy [1] - 1545:25

multiple [1] - 1543:47

multitude [1] - 1543:24

must [9] - 1452:6, 1465:2, 1465:37, 1467:47, 1534:16,

1534:41, 1535:14,
1535:32, 1548:41

N

name [8] - 1480:42,
1496:36, 1498:26,
1513:20, 1514:37,
1562:19, 1562:20
narrative [3] - 1466:1,
1532:20, 1532:24
narrows [1] - 1449:14
nature [7] - 1489:41,
1499:26, 1499:28,
1501:32, 1509:28,
1532:13, 1553:42
near [1] - 1472:44
nearly [2] - 1517:11,
1538:35
necessarily [10] -
1468:15, 1468:18,
1468:25, 1469:14,
1482:36, 1487:36,
1488:11, 1553:6,
1553:34, 1561:35
necessary [3] -
1495:28, 1539:40,
1542:13
necessity [1] -
1462:25
need [30] - 1446:40,
1457:39, 1462:47,
1473:16, 1482:3,
1492:13, 1493:9,
1496:1, 1496:6,
1496:17, 1496:19,
1500:39, 1502:33,
1503:37, 1510:9,
1510:12, 1510:13,
1511:36, 1514:1,
1524:6, 1529:38,
1530:3, 1531:10,
1535:28, 1536:21,
1542:37, 1553:16,
1555:6, 1557:4,
1564:25
needed [11] - 1483:4,
1495:43, 1515:2,
1515:43, 1515:46,
1516:6, 1516:34,
1536:33, 1536:38,
1537:1, 1542:38
needs [4] - 1471:14,
1496:25, 1506:47,
1541:34
neutrally [1] - 1490:45
never [10] - 1456:37,
1463:39, 1467:32,
1469:47, 1511:7,
1515:23, 1543:32,

1549:32, 1570:28
new [1] - 1487:23
NEWCASTLE [1] -
1446:18
Newcastle [34] -
1446:25, 1446:26,
1450:35, 1458:22,
1458:36, 1460:17,
1470:12, 1477:14,
1480:34, 1481:35,
1487:11, 1489:17,
1495:40, 1495:41,
1502:17, 1504:4,
1504:15, 1506:43,
1506:44, 1507:12,
1508:17, 1509:24,
1523:10, 1526:13,
1527:13, 1527:21,
1527:31, 1528:40,
1554:4, 1556:27,
1565:25, 1566:9,
1567:42, 1571:41
newspaper [2] -
1489:39, 1556:26
next [7] - 1458:26,
1485:32, 1506:28,
1555:47, 1562:12,
1566:28, 1571:35
night [1] - 1552:32
nine [2] - 1572:40,
1572:43
NMHS [1] - 1506:41
no-one [2] - 1455:36,
1484:9
noises [1] - 1555:4
non [1] - 1461:27
non-publication [1] -
1461:27
none [6] - 1467:9,
1467:11, 1491:11,
1534:43, 1544:1,
1568:5
nonetheless [2] -
1538:41, 1551:24
nonsense [2] -
1474:41, 1474:47
normal [3] - 1468:39,
1527:19, 1566:38
normally [2] -
1495:42, 1566:38
northern [3] -
1563:46, 1564:7,
1564:21
note [64] - 1464:14,
1474:11, 1478:32,
1478:35, 1479:20,
1479:22, 1479:26,
1484:4, 1498:42,
1504:33, 1504:44,
1505:2, 1505:44,

1506:13, 1507:20,
1508:14, 1508:47,
1512:6, 1517:12,
1517:13, 1517:18,
1524:18, 1524:47,
1529:15, 1529:17,
1529:27, 1529:37,
1530:12, 1530:18,
1530:27, 1530:35,
1531:32, 1532:5,
1532:42, 1532:44,
1533:3, 1533:10,
1533:11, 1533:44,
1533:45, 1534:7,
1534:8, 1534:9,
1534:12, 1534:13,
1534:14, 1534:29,
1534:33, 1534:39,
1535:31, 1535:39,
1536:12, 1536:13,
1551:7, 1554:14,
1554:15, 1554:25,
1558:13, 1558:39,
1559:2, 1559:28,
1560:26, 1561:23,
1561:29
noted [3] - 1498:20,
1505:15, 1562:32
notes [15] - 1464:43,
1483:9, 1493:13,
1505:23, 1505:30,
1506:6, 1532:15,
1532:17, 1532:20,
1532:24, 1533:14,
1534:22, 1535:8,
1535:18, 1546:21
nothing [21] -
1448:19, 1471:26,
1483:17, 1483:20,
1483:22, 1483:24,
1483:34, 1491:20,
1495:35, 1496:43,
1499:6, 1517:25,
1518:12, 1531:40,
1532:5, 1532:7,
1532:10, 1535:20,
1546:36, 1552:26,
1554:16
nothing's [1] -
1488:12
notice [4] - 1505:33,
1526:37, 1560:47,
1561:18
noticed [1] - 1561:9
noting [1] - 1505:3
notion [1] - 1481:28
notwithstanding [1] -
1491:27
November [22] -
1458:40, 1459:26,

1459:31, 1459:35,
1495:1, 1495:7,
1495:11, 1495:15,
1495:46, 1513:23,
1514:47, 1515:10,
1516:14, 1516:22,
1523:25, 1523:38,
1525:26, 1526:10,
1527:3, 1528:34,
1541:1
NP [3] - 1514:1,
1514:15, 1514:34
NPJ [1] - 1514:24
NSW [8] - 1446:26,
1491:45, 1496:2,
1508:16, 1510:3,
1544:6, 1547:22,
1562:22
Number [1] - 1446:26
number [38] - 1446:2,
1447:9, 1451:46,
1452:40, 1456:31,
1458:5, 1464:2,
1464:31, 1484:25,
1484:26, 1484:31,
1484:45, 1488:4,
1489:40, 1495:16,
1501:11, 1501:29,
1501:33, 1501:34,
1502:44, 1502:45,
1503:18, 1504:37,
1504:40, 1515:41,
1516:36, 1523:44,
1542:18, 1542:19,
1543:22, 1543:23,
1543:26, 1548:27,
1554:43, 1557:45,
1558:9
numbering [1] -
1529:44
numbers [1] - 1470:17
numerous [6] -
1465:46, 1465:47,
1485:6, 1488:25,
1544:2, 1549:41

O

oath [1] - 1517:7
obfuscate [1] -
1545:23
object [27] - 1462:45,
1466:19, 1466:32,
1471:14, 1471:37,
1471:38, 1472:24,
1490:8, 1490:32,
1490:39, 1490:40,
1490:42, 1496:5,
1496:13, 1531:10,
1531:23, 1534:46,
1541:34, 1541:47,
1542:24, 1544:17,
1544:45, 1549:40,
1550:6
objection [5] -
1466:45, 1472:4,
1472:33, 1531:24,
1545:1
observation [5] -
1485:1, 1485:25,
1487:17, 1488:35,
1509:43
observations [1] -
1509:44
observed [2] -
1507:28, 1507:30
obtain [4] - 1564:25,
1565:4, 1566:37,
1567:10
obtained [3] - 1511:1,
1565:8, 1569:2
obtaining [2] -
1539:35, 1569:9
obvious [2] - 1555:28,
1557:31
obviously [5] -
1456:42, 1486:24,
1501:21, 1501:26,
1508:7
occasion [5] -
1517:24, 1535:1,
1535:15, 1565:30,
1570:32
occasions [10] -
1452:40, 1452:46,
1487:36, 1510:24,
1516:36, 1540:18,
1542:18, 1543:22,
1549:41, 1567:41
occupation [1] -
1559:45
occur [7] - 1470:37,
1470:39, 1497:29,
1510:7, 1539:41,
1540:9, 1560:12
occurred [42] -
1446:22, 1447:33,
1452:23, 1452:24,
1462:36, 1470:37,
1470:39, 1470:40,
1490:29, 1495:23,
1495:42, 1500:44,
1501:43, 1502:42,
1504:17, 1505:23,
1505:25, 1506:9,
1507:24, 1507:29,
1508:10, 1510:26,
1523:25, 1525:18,
1526:37, 1529:28,
1531:47, 1533:11,

1533:20, 1533:22,
1534:2, 1534:6,
1534:12, 1534:34,
1534:43, 1535:14,
1538:24, 1538:47,
1560:20, 1568:25,
1568:30, 1569:47

occurring [3] -
1452:33, 1502:10,
1532:45

October [17] -
1458:32, 1458:39,
1459:26, 1462:34,
1462:40, 1465:1,
1467:44, 1468:7,
1485:26, 1485:31,
1485:47, 1486:17,
1512:6, 1565:41,
1566:12, 1567:22,
1571:47

OF [6] - 1446:12,
1446:14, 1446:18,
1459:18, 1499:13,
1563:9

off-line [3] - 1502:36,
1510:10, 1510:13

offences [7] -
1448:17, 1449:7,
1449:21, 1452:22,
1452:33, 1467:34,
1546:22

offenders [1] -
1489:42

offends [1] - 1553:11

Office [1] - 1446:42

office [15] - 1465:21,
1487:23, 1564:32,
1564:34, 1566:36,
1567:17, 1567:22,
1567:31, 1567:46,
1569:7, 1570:23,
1570:25, 1570:26,
1570:30

officer [32] - 1447:42,
1455:38, 1455:47,
1458:22, 1458:39,
1458:43, 1459:36,
1490:26, 1499:16,
1504:35, 1505:16,
1509:26, 1509:27,
1539:4, 1542:27,
1545:18, 1554:37,
1556:35, 1563:12,
1563:36, 1563:37,
1563:40, 1564:5,
1564:10, 1564:20,
1567:31, 1567:34,
1567:42, 1568:4,
1568:18, 1568:26

officer's [1] - 1568:19

officers [16] - 1450:30,
1452:42, 1452:47,
1455:25, 1458:9,
1459:27, 1480:34,
1492:5, 1501:4,
1501:34, 1503:38,
1506:25, 1554:35,
1561:11, 1561:13,
1561:15

OFFICERS [1] -
1459:18

officials [2] - 1486:40,
1486:46

often [2] - 1540:18,
1565:15

once [7] - 1449:7,
1451:3, 1470:44,
1487:44, 1488:12,
1506:1, 1555:18

one [97] - 1447:22,
1447:25, 1447:37,
1447:40, 1447:41,
1448:25, 1449:19,
1449:24, 1451:28,
1451:33, 1455:36,
1456:34, 1456:39,
1457:16, 1458:23,
1459:27, 1459:40,
1459:47, 1460:14,
1460:16, 1465:43,
1466:37, 1467:30,
1470:24, 1470:25,
1472:16, 1478:14,
1479:5, 1479:17,
1479:30, 1479:31,
1482:47, 1483:1,
1483:16, 1484:9,
1484:32, 1487:18,
1488:15, 1489:35,
1490:28, 1491:43,
1492:17, 1492:18,
1495:5, 1495:28,
1496:18, 1496:25,
1501:11, 1501:17,
1503:7, 1503:8,
1504:24, 1504:30,
1514:3, 1515:36,
1515:43, 1515:46,
1516:6, 1517:39,
1523:9, 1524:14,
1524:29, 1524:40,
1536:17, 1539:28,
1539:31, 1542:17,
1542:26, 1543:25,
1543:27, 1545:36,
1545:37, 1547:37,
1547:38, 1549:22,
1549:30, 1552:15,
1552:28, 1553:29,
1553:37, 1553:38,

1554:40, 1555:18,
1556:14, 1556:19,
1556:22, 1557:17,
1560:18, 1565:30,
1565:35, 1567:21,
1568:17, 1568:38,
1568:47, 1569:6,
1572:3, 1572:19

one's [1] - 1468:13

one-sided [1] -
1456:39

ones [2] - 1486:41,
1560:18

onwards [2] -
1455:23, 1565:20

open [2] - 1452:27,
1511:20

open-ended [1] -
1452:27

opened [1] - 1496:3

operating [2] - 1471:4,
1516:28

operation [1] - 1500:9

operations [7] -
1499:21, 1499:24,
1502:2, 1502:5,
1502:31, 1502:35,
1509:15

opinion [12] -
1448:21, 1452:6,
1452:9, 1452:16,
1483:31, 1504:27,
1525:31, 1551:25,
1551:40, 1552:10,
1554:36, 1559:41

opinions [1] - 1453:1

opportunity [4] -
1474:24, 1492:12,
1529:38, 1542:10

opposite [1] - 1457:34

oral [4] - 1493:12,
1523:20, 1523:23,
1528:2

orally [1] - 1492:5

order [4] - 1461:27,
1487:29, 1495:29,
1496:3

ordinarily [1] -
1555:34

organisation [3] -
1483:4, 1544:2,
1551:27

organised [1] -
1487:24

origin [2] - 1512:23,
1512:41

original [5] - 1486:39,
1503:30, 1503:34,
1561:12, 1561:13

originated [1] -
1571:30

ostensibly [1] -
1463:44

otherwise [5] -
1472:26, 1491:43,
1501:17, 1504:19,
1554:46

ought [2] - 1451:12,
1459:13

outed [1] - 1488:30

outlaw [1] - 1499:46

outline [2] - 1500:37,
1510:3

outlined [1] - 1542:7

outside [2] - 1448:13,
1524:7

overall [2] - 1531:13,
1531:15

overarching [1] -
1517:45

overlooked [2] -
1483:9, 1490:14

overnight [1] -
1446:22

oversight [1] -
1564:30

oversighting [2] -
1502:32, 1537:44

overstepped [1] -
1491:30

own [5] - 1511:34,
1529:17, 1533:45,
1540:16, 1551:47

P

pack [1] - 1552:34

page [82] - 1448:36,
1448:41, 1453:17,
1453:18, 1460:20,
1464:12, 1473:23,
1473:24, 1475:2,
1478:46, 1479:4,
1481:35, 1481:44,
1482:2, 1482:7,
1482:8, 1484:22,
1484:28, 1485:1,
1485:32, 1488:26,
1489:38, 1489:44,
1492:19, 1493:29,
1494:17, 1494:25,
1494:34, 1496:15,
1503:17, 1503:21,
1504:37, 1504:40,
1505:2, 1506:12,
1512:5, 1512:27,
1512:29, 1514:4,
1517:13, 1517:38,
1518:15, 1520:46,
1520:47, 1522:43,
1527:7, 1529:43,
1529:44, 1530:8,
1530:17, 1530:18,
1530:20, 1533:3,
1533:27, 1533:31,
1533:32, 1534:15,
1534:41, 1540:37,
1541:1, 1543:41,
1545:40, 1545:42,
1547:36, 1549:27,
1551:11, 1551:13,
1552:9, 1556:9,
1556:23, 1558:42,
1559:3, 1561:16,
1561:28, 1562:44,
1570:47, 1571:1

pages [5] - 1532:44,
1548:27, 1548:34,
1549:6

pagination [1] -
1529:43

paint [2] - 1474:46,
1524:28

panic [2] - 1464:19,
1464:21

paper [5] - 1481:44,
1488:26, 1489:44,
1489:47, 1566:28

papers [1] - 1512:16

paperwork [3] -
1482:38, 1487:28,
1542:8

paragraph [46] -
1447:2, 1447:15,
1450:3, 1451:11,
1465:43, 1465:45,
1467:14, 1467:37,
1474:18, 1485:2,
1485:32, 1501:46,
1504:44, 1505:3,
1508:14, 1508:17,
1509:22, 1509:43,
1522:31, 1522:42,
1527:7, 1529:6,
1536:24, 1536:28,
1536:40, 1537:38,
1538:25, 1551:12,
1555:12, 1556:36,
1557:17, 1557:21,
1558:38, 1559:27,
1560:36, 1560:37,
1560:39, 1560:45,
1561:29, 1561:30,
1565:19, 1566:42,
1567:15, 1568:40,
1571:26

paragraphs [5] -
1465:43, 1522:34,
1522:47, 1529:1,

1568:36
parameters [2] - 1448:2, 1448:12
paraphrase [3] - 1560:28, 1561:2, 1561:4
pardon [10] - 1463:2, 1477:20, 1526:2, 1532:9, 1536:37, 1537:15, 1538:6, 1540:13, 1548:14, 1570:9
parentheses [1] - 1485:38
Parker [30] - 1449:46, 1451:3, 1451:4, 1451:20, 1460:7, 1462:37, 1466:6, 1478:33, 1479:27, 1479:35, 1481:13, 1481:22, 1481:25, 1487:42, 1487:44, 1498:16, 1498:26, 1499:11, 1517:4, 1530:20, 1533:5, 1533:37, 1542:45, 1543:4, 1555:11, 1555:20, 1556:2, 1556:14, 1557:39, 1562:7
PARKER [2] - 1498:22, 1499:13
Parker's [1] - 1479:31
part [33] - 1447:40, 1450:22, 1451:4, 1451:16, 1453:6, 1455:38, 1455:41, 1459:12, 1463:37, 1463:44, 1464:3, 1479:29, 1490:26, 1491:47, 1492:6, 1493:23, 1496:17, 1497:25, 1500:46, 1502:26, 1505:23, 1505:29, 1505:34, 1505:40, 1510:21, 1517:18, 1530:1, 1540:41, 1541:1, 1550:42, 1550:47, 1557:19, 1565:12
particular [41] - 1453:4, 1456:26, 1456:27, 1456:47, 1458:14, 1465:42, 1466:4, 1466:33, 1468:46, 1489:46, 1499:24, 1499:46, 1500:8, 1502:8, 1502:9, 1503:29, 1505:16, 1513:11, 1513:20, 1515:35, 1517:40, 1527:6, 1527:18, 1527:41, 1528:27, 1529:11, 1530:17, 1534:38, 1537:16, 1543:44, 1546:2, 1546:8, 1548:5, 1549:42, 1552:28, 1553:33, 1555:22, 1561:37, 1564:25, 1568:4
particularly [10] - 1471:5, 1482:9, 1490:3, 1505:17, 1505:19, 1528:39, 1533:17, 1553:13, 1568:7, 1568:21
parties [1] - 1492:25
parts [3] - 1480:16, 1482:37, 1530:13
party [2] - 1452:36, 1468:37
pass [2] - 1507:15, 1507:17
passage [1] - 1570:44
past [4] - 1452:25, 1542:40, 1543:2, 1548:18
patently [1] - 1557:31
Paul [3] - 1492:20, 1493:30, 1552:32
pause [1] - 1459:4
pay [1] - 1571:35
people [12] - 1449:23, 1449:25, 1468:27, 1483:5, 1502:38, 1532:16, 1543:47, 1547:22, 1561:34, 1564:24, 1564:33, 1571:23
people's [1] - 1493:10
per [8] - 1463:46, 1466:8, 1494:8, 1502:23, 1544:9, 1551:45, 1552:31, 1553:19
perceived [7] - 1463:39, 1464:25, 1470:36, 1470:39, 1492:45, 1493:2, 1493:13
perception [2] - 1500:38, 1560:13
perfectly [1] - 1470:46
perform [1] - 1553:18
performed [1] - 1500:20
perhaps [12] - 1458:25, 1468:32, 1492:10, 1492:43, 1503:37, 1525:25, 1532:14, 1536:3, 1536:6, 1544:30, 1546:8, 1566:18
period [39] - 1448:17, 1449:15, 1449:16, 1449:34, 1449:40, 1452:21, 1452:26, 1455:8, 1455:23, 1455:45, 1456:6, 1458:14, 1458:43, 1459:28, 1459:33, 1460:12, 1460:14, 1460:15, 1460:16, 1467:43, 1467:47, 1468:7, 1484:10, 1485:4, 1489:18, 1495:21, 1495:39, 1497:44, 1499:36, 1500:13, 1510:43, 1526:6, 1526:18, 1530:11, 1531:1, 1531:18, 1531:33, 1537:25, 1538:27
periods [2] - 1458:11, 1458:42
permission [1] - 1514:9
permit [1] - 1467:2
permitted [1] - 1456:22
peroration [3] - 1544:13, 1544:14, 1544:22
perpetrator [1] - 1497:1
person [6] - 1477:47, 1493:33, 1508:31, 1543:29, 1553:27, 1555:25
person's [1] - 1491:4
personal [2] - 1493:22, 1493:25
personally [5] - 1463:39, 1467:40, 1478:29, 1510:31, 1567:33
personnel [2] - 1450:27, 1458:1
persons [1] - 1558:5
perspective [1] - 1523:2
pertaining [1] - 1545:12
Pete [1] - 1546:11
Peter [3] - 1469:14, 1495:6, 1567:17
petrified [2] - 1481:34, 1482:5
phone [26] - 1462:1, 1462:2, 1462:6, 1462:30, 1462:32, 1462:34, 1462:39, 1464:4, 1464:28, 1465:6, 1474:11, 1480:5, 1480:7, 1486:11, 1514:22, 1514:46, 1515:3, 1515:17, 1515:19, 1515:29, 1515:33, 1515:36, 1525:4, 1526:32, 1526:36, 1546:12
phones [1] - 1481:22
photocopy [1] - 1503:29
photograph [1] - 1514:24
phrase [5] - 1466:46, 1469:12, 1480:7, 1482:25, 1527:37
physical [4] - 1468:23, 1468:27, 1468:41, 1567:26
PIC [1] - 1446:4
pick [1] - 1524:8
picked [1] - 1484:16
picture [1] - 1524:28
pin [1] - 1453:4
pink [1] - 1570:7
pipeline [2] - 1506:46, 1506:47
place [3] - 1487:27, 1489:13, 1539:29
placed [1] - 1543:29
places [1] - 1468:47
plainclothes [1] - 1499:31
plan [19] - 1451:15, 1467:40, 1485:41, 1492:6, 1492:19, 1493:26, 1493:32, 1526:43, 1538:3, 1538:7, 1538:14, 1538:19, 1538:28, 1538:30, 1538:43, 1539:12, 1539:18, 1540:1
planned [1] - 1467:39
plans [1] - 1490:5
play [1] - 1488:8
played [1] - 1489:47
pleading [1] - 1448:4
plucked [1] - 1451:45
plural [1] - 1473:16
point [42] - 1446:43, 1451:44, 1461:15, 1471:40, 1481:33, 1487:15, 1488:19, 1490:18, 1492:17, 1496:46, 1501:37, 1502:21, 1502:26, 1505:45, 1515:3, 1516:9, 1518:10, 1525:30, 1531:12, 1533:45, 1534:3, 1534:14, 1534:15, 1534:20, 1534:30, 1534:40, 1534:42, 1534:44, 1535:29, 1537:16, 1537:27, 1537:42, 1538:28, 1538:42, 1545:16, 1545:26, 1555:22, 1555:33, 1556:31, 1561:38, 1563:19, 1564:15
poison [1] - 1480:46
poke [1] - 1560:5
police [21] - 1450:29, 1456:32, 1474:43, 1486:41, 1491:30, 1492:5, 1498:45, 1499:16, 1500:26, 1511:20, 1511:40, 1527:19, 1556:32, 1558:34, 1558:35, 1560:13, 1563:11, 1563:22, 1567:31, 1568:4, 1570:11
Police [12] - 1474:29, 1474:36, 1474:37, 1478:17, 1491:46, 1496:2, 1501:23, 1508:16, 1510:3, 1544:6, 1547:23, 1562:22
POLICE [1] - 1446:14
policing [1] - 1496:45
poor [1] - 1507:7
Port [1] - 1512:37
position [27] - 1451:4, 1456:45, 1459:22, 1474:24, 1478:47, 1481:32, 1483:15, 1483:18, 1500:7, 1500:34, 1503:26, 1504:15, 1504:16, 1506:40, 1509:24, 1509:38, 1510:3, 1517:44, 1525:30, 1528:23, 1552:39, 1564:1, 1564:10, 1564:16, 1565:5, 1567:33, 1568:8
positions [2] - 1456:28, 1523:9
positive [2] - 1489:5, 1490:43
positively [1] -

1465:34
posits [1] - 1466:19
possession [1] - 1486:33
possibility [1] - 1491:31
possible [8] - 1483:5, 1488:24, 1489:42, 1517:47, 1518:5, 1565:33, 1569:10, 1571:41
possibly [10] - 1464:18, 1496:5, 1496:24, 1532:46, 1533:12, 1533:28, 1535:15, 1539:9, 1548:18, 1559:40
post [1] - 1466:37
potential [3] - 1493:20, 1509:45, 1511:27
predecessor [1] - 1482:20
predicate [1] - 1488:11
predicates [1] - 1449:16
predicating [1] - 1448:7
preferable [1] - 1488:16
prehistoric [1] - 1487:28
prejudicial [1] - 1491:11
preliminary [1] - 1541:35
premise [1] - 1543:31
premises [2] - 1543:27, 1567:27
preparation [1] - 1512:41
prepare [5] - 1452:2, 1458:5, 1464:27, 1485:40, 1560:6
prepared [15] - 1449:46, 1457:45, 1491:41, 1498:37, 1503:21, 1504:34, 1512:25, 1512:30, 1513:24, 1517:12, 1517:14, 1517:15, 1529:16, 1538:30, 1562:37
PREPARED [1] - 1459:18
preparing [2] - 1499:39, 1512:16
preposterous [1] - 1481:29
presence [4] - 1502:33, 1502:34, 1508:11, 1528:3
present [15] - 1487:6, 1500:37, 1502:30, 1505:33, 1505:40, 1505:41, 1505:42, 1507:33, 1508:25, 1508:30, 1508:35, 1508:42, 1510:4, 1531:34, 1564:16
presented [2] - 1482:39, 1532:17
presently [1] - 1562:25
press [4] - 1473:16, 1489:25, 1489:28, 1506:37
pressing [1] - 1524:38
pressure [1] - 1550:23
presumably [10] - 1451:11, 1452:14, 1474:45, 1525:25, 1528:8, 1538:9, 1539:10, 1539:17, 1552:10
presume [5] - 1448:21, 1464:6, 1470:13, 1514:28, 1554:32
presumed [1] - 1540:20
pretext [1] - 1465:20
pretty [4] - 1480:9, 1507:46, 1551:43, 1560:16
prevail [1] - 1504:27
previous [1] - 1523:45
priest [1] - 1513:45
primarily [1] - 1450:37
primary [4] - 1500:27, 1510:1, 1554:3, 1555:26
principal [8] - 1490:35, 1554:8, 1554:41, 1554:47, 1555:18, 1555:23, 1555:24, 1564:20
principally [1] - 1469:4
principle [4] - 1488:22, 1488:35, 1488:36, 1488:38
priority [2] - 1495:44, 1524:43
privy [1] - 1527:22
proactive [1] - 1500:42
problem [5] - 1463:16, 1467:1, 1481:32, 1493:1, 1493:30
problematic [1] - 1553:42
problems [4] - 1556:46, 1557:30, 1560:14, 1560:17
procedures [1] - 1496:27
proceed [1] - 1485:28
proceedings [1] - 1518:2
process [11] - 1448:25, 1455:39, 1468:23, 1468:27, 1495:23, 1495:29, 1497:41, 1504:20, 1507:9, 1507:10, 1538:42
produce [2] - 1541:27, 1541:44
produced [8] - 1457:45, 1536:43, 1537:2, 1538:11, 1542:1, 1542:6, 1543:32, 1553:34
profession [1] - 1483:2
progress [1] - 1507:6
progression [1] - 1527:20
progressively [1] - 1523:35
project [1] - 1451:4
promoted [7] - 1499:42, 1500:7, 1500:10, 1500:25, 1500:30, 1563:15, 1563:29
prompt [2] - 1462:32, 1514:13
prompted [3] - 1513:42, 1514:15, 1533:23
promptly [2] - 1538:24, 1539:1
pronouncements [1] - 1545:30
proof [2] - 1472:19, 1480:41
proper [14] - 1470:46, 1471:31, 1472:10, 1472:34, 1472:41, 1472:43, 1472:44, 1477:34, 1477:36, 1478:12, 1478:19, 1481:11, 1487:26, 1490:9
properly [3] - 1478:6, 1491:20, 1542:41
proportion [1] - 1505:11
proposition [25] - 1447:30, 1452:4, 1455:9, 1471:20, 1472:19, 1481:3, 1482:2, 1482:16, 1484:41, 1485:21, 1491:7, 1525:1, 1530:35, 1531:32, 1532:41, 1533:9, 1533:40, 1533:44, 1534:39, 1535:2, 1538:47, 1543:28, 1549:47, 1555:4, 1561:23
propositions [1] - 1446:43
propter [1] - 1466:38
pros [1] - 1501:36
prosecuted [1] - 1557:1
prosecution [4] - 1491:28, 1491:30, 1491:31, 1499:39
prosecutions [1] - 1491:32
prosecutor [1] - 1499:36
proved [1] - 1555:30
provide [7] - 1447:47, 1514:19, 1564:27, 1564:32, 1565:10, 1566:40, 1569:36
provided [14] - 1477:13, 1477:21, 1480:46, 1486:45, 1503:31, 1511:5, 1511:20, 1523:17, 1537:8, 1541:2, 1545:7, 1546:43, 1558:24, 1567:12
providing [1] - 1558:15
province [1] - 1478:6
proxy [2] - 1478:20, 1478:21
pseudonym [1] - 1514:1
psychic [1] - 1551:44
public [7] - 1489:39, 1490:10, 1512:42, 1543:23, 1543:45, 1545:11, 1545:30
publication [1] - 1461:27
publicity [2] - 1481:34, 1482:12
publish [7] - 1492:25, 1559:8, 1559:16, 1559:22, 1559:23, 1560:29, 1566:28
published [3] - 1462:12, 1462:19, 1484:21
pudding [1] - 1472:19
puff [1] - 1471:26
puncture [1] - 1507:11
pure [1] - 1551:38
purported [1] - 1534:34
purpose [7] - 1458:8, 1458:12, 1474:26, 1495:31, 1516:31, 1517:43, 1528:27
purposes [13] - 1447:21, 1447:39, 1448:23, 1453:1, 1458:21, 1474:20, 1479:12, 1510:9, 1512:15, 1527:25, 1535:28, 1538:19, 1539:29
pursuant [1] - 1516:27
pursue [1] - 1516:34
pursued [1] - 1471:44
pursuing [2] - 1510:41, 1511:31
put [92] - 1446:44, 1447:30, 1449:46, 1452:4, 1452:36, 1452:37, 1456:16, 1457:12, 1457:16, 1457:18, 1458:19, 1462:10, 1464:46, 1465:18, 1465:22, 1465:24, 1465:26, 1465:28, 1465:35, 1465:46, 1466:23, 1467:2, 1467:23, 1469:26, 1469:47, 1470:33, 1471:8, 1471:16, 1471:47, 1472:3, 1472:9, 1472:34, 1474:14, 1474:18, 1478:19, 1480:33, 1480:36, 1484:15, 1486:4, 1489:4, 1489:8, 1489:11, 1490:33, 1491:18, 1491:19, 1491:25, 1492:23, 1492:46, 1493:11, 1496:18, 1500:10, 1510:10, 1510:14, 1522:33, 1524:33, 1526:39, 1528:36, 1531:5, 1531:19, 1531:20, 1531:36, 1535:3, 1535:12, 1535:17, 1535:28,

1535:44, 1536:5,
1536:6, 1539:21,
1542:36, 1543:28,
1543:31, 1543:46,
1544:17, 1544:18,
1545:8, 1545:24,
1549:47, 1550:10,
1553:2, 1555:4,
1555:21, 1558:14,
1559:38, 1560:47,
1561:1, 1561:18,
1561:20, 1561:37
puts [2] - 1451:38,
1491:18
putting [14] - 1474:32,
1490:43, 1523:4,
1527:37, 1531:32,
1532:28, 1532:30,
1532:34, 1532:41,
1533:9, 1542:44,
1568:17, 1569:6

Q

quarantined [1] -
1491:37
quarters [1] - 1551:12
Queensland [1] -
1552:33
Queenslanders [1] -
1446:25
questioned [2] -
1462:7, 1462:36
questioning [1] -
1459:13
questions [31] -
1447:6, 1447:10,
1456:12, 1456:15,
1456:20, 1471:38,
1483:36, 1488:43,
1488:45, 1497:5,
1501:42, 1502:16,
1509:12, 1520:42,
1528:44, 1531:45,
1536:8, 1541:35,
1544:27, 1544:36,
1544:39, 1545:8,
1545:22, 1545:26,
1548:42, 1550:23,
1555:47, 1556:2,
1561:45, 1562:2,
1562:4
quick [3] - 1447:5,
1529:38, 1529:47
quickly [2] - 1536:29,
1552:15
Quinn [7] - 1466:7,
1504:35, 1506:15,
1529:16, 1532:43,
1571:40

Quinn's [1] - 1534:33
quite [21] - 1449:21,
1451:10, 1451:25,
1458:4, 1458:19,
1477:20, 1482:21,
1493:6, 1496:18,
1524:29, 1533:28,
1535:6, 1538:41,
1541:13, 1544:10,
1552:3, 1553:36,
1554:28, 1558:1,
1560:26, 1570:4
quoting [1] - 1469:11

R

raise [2] - 1515:9,
1515:10
raised [8] - 1505:34,
1505:38, 1514:8,
1516:21, 1517:11,
1517:29, 1569:28,
1569:33
rang [4] - 1465:2,
1465:6, 1515:40,
1558:14
rank [5] - 1498:32,
1500:25, 1510:2,
1563:15, 1563:29
ranks [1] - 1492:8
rate [2] - 1544:3,
1553:20
rather [11] - 1448:4,
1452:21, 1489:13,
1502:7, 1514:21,
1515:29, 1517:39,
1525:3, 1529:41,
1544:22, 1553:10
Raymond [1] -
1499:31
re [5] - 1471:16,
1486:12, 1498:5,
1506:23, 1549:1
RE [1] - 1459:17
re-collate [1] - 1549:1
re-contact [1] -
1486:12
re-examination [1] -
1498:5
re-put [1] - 1471:16
reach [1] - 1457:18
reached [1] - 1446:43
read [48] - 1447:5,
1447:11, 1459:23,
1502:45, 1502:46,
1503:5, 1503:30,
1506:28, 1513:16,
1513:17, 1513:25,
1515:15, 1515:28,

1516:14, 1522:36,
1525:33, 1525:47,
1526:3, 1526:5,
1526:9, 1526:11,
1526:14, 1526:41,
1528:1, 1529:2,
1529:4, 1530:1,
1530:8, 1530:15,
1545:22, 1546:13,
1546:47, 1547:1,
1547:7, 1547:10,
1547:34, 1547:46,
1548:1, 1549:30,
1549:32, 1549:34,
1549:42, 1550:22,
1550:28, 1550:38,
1557:18
reading [3] - 1484:39,
1506:34, 1523:34
reads [6] - 1522:39,
1529:8, 1530:8,
1547:31, 1557:22,
1561:17
ready [3] - 1446:34,
1446:37, 1487:29
real [3] - 1481:32,
1482:11
realise [1] - 1548:39
realised [1] - 1537:5
reality [1] - 1555:5
really [16] - 1447:38,
1448:26, 1451:45,
1456:15, 1485:47,
1486:17, 1487:38,
1492:29, 1493:6,
1501:23, 1507:7,
1514:43, 1523:11,
1530:27, 1559:39,
1569:37
reason [22] - 1449:45,
1452:36, 1468:37,
1474:26, 1474:43,
1478:43, 1491:29,
1491:36, 1495:35,
1496:41, 1496:46,
1497:2, 1510:40,
1511:4, 1511:11,
1511:12, 1511:18,
1527:35, 1547:28,
1552:4, 1552:5,
1552:29
reasonable [1] -
1516:8
reasons [6] - 1459:12,
1478:14, 1485:7,
1488:4, 1489:40,
1547:29
rebel [1] - 1524:14
rebut [1] - 1490:19
recalled [1] - 1569:41

receive [2] - 1511:46,
1565:15
received [10] - 1465:6,
1466:5, 1477:46,
1478:33, 1511:7,
1511:45, 1513:44,
1546:44, 1565:47,
1572:4
recent [1] - 1446:8
recently [1] - 1524:29
recites [1] - 1533:40
recognised [1] -
1549:27
recollect [1] - 1510:24
recollection [32] -
1489:11, 1502:44,
1505:46, 1509:17,
1513:29, 1514:13,
1524:31, 1530:38,
1531:41, 1533:15,
1533:20, 1533:22,
1534:18, 1534:21,
1535:40, 1557:5,
1566:27, 1567:9,
1567:21, 1567:47,
1568:2, 1568:3,
1568:37, 1568:47,
1569:4, 1572:3,
1572:5, 1572:9,
1572:13, 1572:15,
1572:18, 1572:19
record [15] - 1457:6,
1457:8, 1458:2,
1459:23, 1491:41,
1498:42, 1517:22,
1526:41, 1551:17,
1552:9, 1552:27,
1554:30, 1554:32,
1554:33, 1565:40
recorded [12] -
1479:35, 1507:27,
1507:30, 1517:19,
1533:10, 1533:15,
1533:26, 1533:45,
1534:2, 1534:18,
1535:32, 1535:37
records [7] - 1457:47,
1458:15, 1458:20,
1491:42, 1534:8,
1534:40, 1572:6
recycled [1] - 1480:45
red [3] - 1548:17,
1548:22, 1548:28
redacted [2] -
1498:44, 1514:28
refer [13] - 1456:20,
1456:41, 1462:47,
1465:45, 1467:7,
1467:37, 1496:15,
1498:33, 1509:21,

1517:41, 1525:15,
1537:38, 1565:20
reference [41] -
1447:5, 1447:16,
1447:17, 1447:22,
1447:23, 1447:34,
1447:39, 1447:47,
1448:14, 1448:16,
1448:26, 1448:36,
1448:39, 1449:2,
1449:6, 1449:24,
1449:26, 1449:34,
1449:38, 1450:5,
1450:15, 1450:18,
1450:28, 1450:47,
1451:12, 1451:14,
1451:24, 1451:44,
1452:19, 1477:28,
1486:10, 1494:37,
1503:15, 1516:27,
1537:21, 1539:35,
1546:39, 1547:26,
1566:44, 1569:6,
1571:30
references [1] -
1469:1
referral [1] - 1464:10
referred [5] - 1470:7,
1471:43, 1515:36,
1546:39, 1569:22
referring [14] -
1451:33, 1456:4,
1465:47, 1467:14,
1470:15, 1491:4,
1491:16, 1493:10,
1506:5, 1514:2,
1516:32, 1524:47,
1547:2, 1568:41
refers [8] - 1447:4,
1456:31, 1530:13,
1542:17, 1543:25,
1547:37, 1571:22,
1571:46
reflect [1] - 1557:24
reflection [2] -
1505:24, 1553:18
reflects [1] - 1552:41
regard [11] - 1447:2,
1451:28, 1452:18,
1452:19, 1463:32,
1496:25, 1518:3,
1522:46, 1524:46,
1528:32, 1531:31
regarding [12] -
1498:45, 1500:9,
1509:44, 1510:32,
1511:24, 1512:33,
1514:9, 1514:47,
1518:2, 1540:19,
1548:6, 1556:31

regards [1] - 1452:44
region [25] - 1464:26, 1477:17, 1477:22, 1477:23, 1480:46, 1481:33, 1481:38, 1481:40, 1482:5, 1482:21, 1494:26, 1495:25, 1502:10, 1508:15, 1508:18, 1528:36, 1563:45, 1563:46, 1564:7, 1564:22, 1566:8, 1566:33, 1566:36, 1566:40, 1569:36
Region's [1] - 1533:38
region's [6] - 1506:39, 1525:30, 1525:31, 1527:21, 1528:10, 1528:23
regional [1] - 1527:17
regret [1] - 1446:40
regretfully [1] - 1565:26
reinforce [1] - 1508:20
reiterate [4] - 1534:17, 1535:7, 1535:18, 1545:10
relate [1] - 1546:21
related [7] - 1468:7, 1487:22, 1502:45, 1503:7, 1503:9, 1514:34, 1544:46
relates [5] - 1464:3, 1491:25, 1496:26, 1498:8, 1527:8
RELATING [1] - 1446:14
relating [3] - 1503:10, 1510:33, 1546:22
relation [30] - 1450:30, 1455:39, 1462:28, 1464:15, 1467:33, 1472:22, 1473:11, 1482:9, 1489:6, 1491:46, 1500:47, 1502:10, 1502:15, 1502:43, 1509:14, 1509:18, 1513:19, 1513:23, 1513:43, 1513:45, 1515:41, 1535:42, 1552:27, 1555:24, 1564:26, 1566:29, 1566:32, 1568:40, 1569:1, 1569:8
relationship [3] - 1551:34, 1561:33, 1561:39
relationships [1] - 1561:35
relative [2] - 1462:26, 1468:21
relatively [2] - 1538:24, 1539:1
relaying [2] - 1567:41, 1568:18
release [1] - 1446:7
released [1] - 1446:5
relevance [3] - 1471:40, 1471:41, 1499:24
relevant [15] - 1447:27, 1455:45, 1458:9, 1462:30, 1464:10, 1467:20, 1467:25, 1467:32, 1501:1, 1511:21, 1511:47, 1524:28, 1536:44, 1539:35, 1567:3
relevantly [1] - 1531:19
relied [2] - 1534:30, 1539:34
relieving [2] - 1458:33, 1459:32
reluctance [3] - 1455:41, 1528:36, 1528:39
reluctant [2] - 1527:14, 1527:39
rely [2] - 1492:35, 1498:18
remain [1] - 1491:9
remaining [2] - 1532:31, 1532:32
remember [11] - 1462:12, 1463:14, 1466:13, 1470:18, 1477:28, 1478:40, 1489:8, 1490:36, 1515:22, 1537:27, 1565:26
remembering [1] - 1495:39
reminded [1] - 1492:4
remove [1] - 1498:44
reopen [7] - 1495:35, 1495:36, 1495:43, 1496:19, 1496:33, 1496:34
reopened [1] - 1495:43
reopening [1] - 1495:29
rep [1] - 1569:22
repeat [5] - 1482:37, 1533:1, 1534:4, 1539:14, 1544:34
repetition [1] - 1532:6
rephrase [1] - 1559:23
reply [2] - 1546:8, 1546:28
replying [1] - 1464:24
report [35] - 1451:29, 1452:21, 1464:15, 1470:21, 1470:28, 1479:23, 1479:26, 1487:31, 1494:30, 1503:10, 1507:46, 1514:47, 1515:10, 1515:15, 1515:16, 1515:24, 1516:14, 1516:22, 1545:47, 1546:13, 1546:16, 1546:39, 1546:43, 1547:2, 1547:10, 1554:24, 1565:6, 1565:8, 1565:9, 1566:1, 1566:12, 1566:37, 1566:43, 1567:11
reported [1] - 1560:15
reporting [1] - 1560:13
reports [4] - 1546:20, 1556:41, 1564:27, 1565:6
represent [1] - 1553:17
reprint [1] - 1449:1
reprinted [1] - 1448:45
reprobate [1] - 1491:7
reputation [3] - 1483:30, 1547:14, 1547:22
request [15] - 1464:42, 1465:15, 1467:12, 1479:32, 1509:10, 1513:43, 1560:14, 1565:16, 1566:37, 1567:41, 1569:20, 1569:34, 1569:45, 1570:25
REQUEST [1] - 1459:18
requested [6] - 1456:34, 1513:18, 1513:45, 1554:14, 1566:7, 1570:1
requested [1] - 1447:11
requesting [2] - 1566:32, 1570:29
requests [7] - 1446:2, 1465:47, 1466:11, 1542:27, 1544:2, 1564:47, 1565:13
requests" [1] - 1465:46
require [1] - 1464:15
required [2] - 1480:41, 1502:12
reread [1] - 1522:35
reserve [1] - 1555:39
resile [1] - 1483:26
resources [1] - 1557:4
resourcing [1] - 1451:18
respect [13] - 1457:34, 1464:22, 1470:46, 1471:35, 1481:46, 1528:37, 1530:47, 1535:31, 1542:38, 1559:15, 1559:16, 1567:4
respectful [1] - 1541:35
respond [2] - 1491:1, 1492:25
response [12] - 1464:27, 1492:24, 1518:9, 1531:44, 1535:45, 1536:8, 1542:38, 1544:36, 1544:43, 1544:45, 1545:8, 1564:33
responsibilities [1] - 1458:16
responsibility [2] - 1461:38, 1487:43
responsible [4] - 1451:5, 1451:8, 1451:21, 1481:28
rest [5] - 1457:18, 1460:9, 1462:14, 1471:39, 1501:23
restricted [2] - 1456:17, 1456:42
result [6] - 1515:30, 1536:33, 1538:32, 1539:13, 1540:15, 1556:37
resume [3] - 1517:4, 1572:40, 1572:43
resumed [1] - 1509:21
RESUMPTION [1] - 1517:2
retrospect [1] - 1487:26
return [4] - 1461:15, 1503:38, 1528:22, 1564:12
returned [2] - 1460:7, 1500:3
review [9] - 1449:44, 1451:36, 1452:29, 1479:12, 1485:26, 1485:36, 1486:15, 1517:13, 1529:38
reviewed [2] - 1493:32, 1547:7
reviewing [1] - 1449:37
Richmond [1] - 1562:30
ridiculous [1] - 1470:2
risk [1] - 1480:36
risks [1] - 1482:8
road [2] - 1471:28, 1477:44
robust [3] - 1469:38, 1469:46, 1470:32
role [33] - 1459:28, 1460:15, 1482:20, 1499:29, 1500:11, 1500:38, 1500:41, 1500:46, 1501:2, 1501:47, 1502:7, 1502:15, 1503:43, 1504:1, 1504:3, 1504:13, 1504:23, 1509:13, 1509:14, 1509:15, 1509:21, 1509:35, 1509:47, 1510:1, 1510:11, 1511:30, 1516:18, 1517:45, 1523:9, 1536:39, 1542:8, 1564:31, 1565:12
Roman [2] - 1455:26, 1558:5
Room [1] - 1446:26
room [4] - 1468:31, 1483:2, 1568:20
Roser [2] - 1496:19, 1498:20
ROSER [10] - 1498:18, 1534:46, 1541:40, 1541:47, 1543:15, 1544:17, 1544:45, 1549:40, 1549:47, 1562:2
roughly [2] - 1468:7, 1523:41
ruckus [1] - 1457:43
rule [1] - 1472:4
ruled [1] - 1463:1
run [4] - 1501:11, 1501:13, 1526:39, 1531:7
run" [1] - 1531:11
running [2] - 1501:17, 1552:33
runs [1] - 1548:18
rush [1] - 1488:29

S

safe [3] - 1463:29, 1514:30, 1528:26

Saidi [22] - 1463:5, 1463:10, 1488:47, 1490:22, 1491:16, 1491:24, 1491:38, 1491:44, 1492:23, 1492:33, 1492:44, 1493:9, 1494:15, 1497:8, 1497:14, 1498:2, 1555:46, 1562:35, 1570:42, 1571:17, 1572:11, 1572:26

SAIDI [33] - 1456:19, 1462:45, 1463:7, 1465:24, 1465:34, 1466:32, 1466:40, 1466:45, 1471:14, 1471:37, 1472:24, 1472:43, 1489:2, 1489:4, 1490:12, 1490:24, 1490:42, 1492:4, 1492:41, 1493:16, 1494:6, 1494:17, 1494:24, 1496:15, 1496:39, 1497:10, 1497:17, 1497:47, 1562:32, 1570:44, 1571:13, 1571:15, 1572:24

sake [3] - 1523:30, 1523:44, 1539:7

sat [1] - 1468:28

satisfactory [1] - 1552:31

satisfied [3] - 1466:12, 1518:7, 1518:11

save [1] - 1492:43

saw [6] - 1463:39, 1467:32, 1486:41, 1512:10, 1512:15, 1558:20

SC [2] - 1446:34, 1446:37

scan [3] - 1468:38, 1513:17, 1536:28

scene [1] - 1563:23

science [1] - 1451:46

scope [1] - 1524:23

scrutiny [2] - 1554:42, 1555:1

se [1] - 1494:8

Search [1] - 1567:16

search [13] - 1465:20, 1567:22, 1567:23, 1567:25, 1567:30, 1567:30, 1567:43, 1568:15, 1568:19, 1570:16, 1570:22, 1570:25, 1570:29

searching [4] - 1462:41, 1481:14, 1569:6, 1569:40

second [26] - 1447:17, 1447:23, 1447:40, 1447:41, 1449:6, 1449:14, 1449:24, 1449:26, 1450:22, 1450:44, 1450:47, 1451:24, 1465:45, 1478:15, 1485:2, 1489:38, 1505:3, 1530:18, 1530:19, 1535:15, 1550:46, 1558:38, 1559:27, 1559:29, 1561:16, 1571:26

secondment [1] - 1500:2

secret [6] - 1457:3, 1457:5, 1457:21, 1472:28, 1481:38, 1528:26

section [1] - 1498:18

secure [1] - 1488:22

securely [1] - 1549:10

see [55] - 1448:40, 1449:5, 1452:35, 1458:44, 1463:7, 1464:25, 1467:21, 1468:11, 1469:3, 1470:13, 1483:9, 1487:28, 1488:33, 1490:20, 1494:37, 1494:41, 1494:45, 1495:1, 1495:16, 1495:38, 1496:46, 1497:2, 1500:20, 1503:16, 1503:18, 1504:36, 1505:2, 1505:7, 1512:5, 1512:25, 1512:38, 1514:8, 1517:35, 1524:10, 1530:12, 1533:6, 1536:16, 1536:17, 1539:44, 1545:20, 1551:14, 1554:36, 1556:26, 1556:30, 1556:32, 1557:1, 1560:5, 1560:33, 1566:12, 1566:43, 1567:1, 1570:28, 1571:22, 1571:30, 1571:43

seeing [2] - 1489:43, 1512:12

seek [3] - 1459:21, 1562:32, 1570:6

seeking [1] - 1569:45

seem [4] - 1446:27, 1450:44, 1471:3, 1536:15

selected [2] - 1451:24, 1500:18

send [1] - 1542:13

Senior [5] - 1466:7, 1504:35, 1529:16, 1532:43, 1534:33

senior [14] - 1450:29, 1452:42, 1452:46, 1455:24, 1455:26, 1458:9, 1480:34, 1535:30, 1536:8, 1544:4, 1545:17, 1554:35, 1554:37, 1565:24

sense [6] - 1450:11, 1487:24, 1496:37, 1496:42, 1539:45

sensible [2] - 1452:25, 1538:42

sensitive [1] - 1492:41

sensitivity [1] - 1498:44

sent [9] - 1464:23, 1464:27, 1467:12, 1469:4, 1470:41, 1486:9, 1546:13, 1566:43, 1571:31

sentence [8] - 1466:28, 1485:24, 1485:33, 1530:19, 1559:30, 1567:1, 1571:35

sentiment [1] - 1560:28

September [13] - 1455:8, 1455:16, 1455:23, 1455:45, 1470:6, 1472:20, 1474:4, 1474:8, 1483:16, 1489:7, 1489:18, 1489:20

sergeant [3] - 1500:26, 1538:31, 1563:16

Sergeant [49] - 1447:42, 1448:37, 1449:43, 1450:6, 1450:17, 1450:20, 1451:20, 1452:29, 1461:41, 1466:6, 1466:7, 1469:4, 1470:42, 1482:45, 1485:35, 1486:1, 1486:21, 1486:28, 1486:32, 1488:13, 1504:35, 1513:44, 1514:23, 1515:40, 1517:12, 1517:14, 1517:28, 1517:34, 1517:46, 1518:4, 1529:16, 1532:43, 1534:33, 1537:29, 1537:36, 1537:38, 1537:44, 1538:2, 1538:10, 1538:26, 1538:44, 1539:4, 1539:11, 1539:17, 1539:23, 1545:9, 1545:14, 1545:22, 1553:35

series [3] - 1446:43, 1494:41, 1497:5

serious [3] - 1448:17, 1481:4, 1500:44

serve [1] - 1457:27

Service [4] - 1474:29, 1474:36, 1474:37, 1501:23

service [2] - 1474:44, 1564:33

Services [1] - 1563:19

servicing [1] - 1559:45

set [7] - 1448:25, 1449:24, 1462:11, 1462:18, 1486:17, 1488:7, 1547:12

sets [3] - 1448:2, 1448:5, 1448:12

setting [1] - 1547:17

settled [4] - 1449:38, 1450:6, 1450:28, 1451:45

settling [1] - 1450:46

several [1] - 1537:35

SEXUAL [1] - 1446:16

sexual [7] - 1467:34, 1499:25, 1499:28, 1499:33, 1552:24, 1553:10, 1553:43

shambles [3] - 1482:26, 1482:27, 1482:30

shape [1] - 1501:20

share [1] - 1545:1

sheer [4] - 1466:16, 1466:29, 1466:33, 1466:35

sheet [1] - 1496:36

Shields [1] - 1460:2

shift [1] - 1487:44

SHORT [2] - 1497:12, 1550:36

short [6] - 1459:33, 1484:10, 1500:39, 1532:21, 1532:25, 1550:32

shorthand [1] - 1464:42

shortly [3] - 1513:25, 1513:26, 1515:28

show [3] - 1457:6, 1458:8, 1498:41

showed [2] - 1458:10, 1464:22

shown [2] - 1457:5, 1467:30

shows [1] - 1456:46

sick [3] - 1484:10, 1510:43, 1557:16

side [6] - 1514:30, 1524:10, 1548:7, 1548:29, 1568:17, 1569:6

sided [1] - 1456:39

sides [1] - 1501:36

signature [1] - 1562:44

signed [4] - 1450:17, 1450:19, 1478:38, 1479:15

significant [4] - 1557:44, 1557:45, 1558:5, 1561:34

simple [6] - 1459:23, 1482:15, 1491:11, 1504:3, 1542:22, 1545:26

simply [11] - 1481:46, 1491:9, 1491:39, 1492:36, 1514:22, 1522:32, 1533:4, 1539:26, 1544:24, 1544:37, 1546:30

single [1] - 1530:19

Singleton [1] - 1500:26

sinister [1] - 1474:47

sit [1] - 1569:22

sit-rep [1] - 1569:22

situation [9] - 1482:25, 1557:26, 1566:1, 1566:12, 1566:37, 1566:39, 1566:43, 1567:11, 1570:18

situations [1] - 1549:19

sketchy [1] - 1525:3

skip [1] - 1485:38

sleep [1] - 1535:25

slightly [4] - 1509:41, 1525:25, 1527:25,

1557:40
slow [2] - 1557:15, 1557:25
smack [1] - 1552:33
so-called [2] - 1569:41, 1569:46
sole [1] - 1460:6
Solicitor's [1] - 1446:42
solidified [1] - 1481:12
solve [1] - 1545:15
someone [6] - 1508:15, 1510:11, 1542:5, 1547:13, 1551:26, 1553:16
somewhat [3] - 1465:44, 1484:14, 1542:7
soon [7] - 1463:30, 1483:4, 1488:24, 1528:8, 1537:28, 1539:5, 1571:41
sorry [70] - 1449:11, 1452:38, 1457:42, 1459:5, 1459:47, 1460:3, 1468:17, 1472:45, 1473:15, 1474:5, 1477:38, 1478:27, 1484:29, 1495:9, 1498:32, 1500:20, 1505:28, 1508:28, 1508:30, 1508:47, 1509:40, 1511:16, 1513:25, 1515:7, 1522:40, 1523:31, 1530:15, 1531:2, 1531:16, 1531:23, 1531:40, 1532:22, 1532:37, 1533:1, 1534:19, 1534:35, 1535:22, 1535:41, 1536:14, 1536:35, 1537:3, 1539:13, 1540:14, 1540:23, 1541:38, 1543:35, 1544:14, 1544:34, 1545:40, 1545:42, 1545:47, 1547:15, 1547:38, 1548:1, 1548:4, 1548:14, 1549:16, 1549:20, 1549:23, 1550:43, 1552:7, 1553:10, 1554:13, 1558:29, 1561:20, 1562:42, 1569:22, 1569:25, 1569:43, 1570:9
sort [5] - 1471:11, 1483:29, 1501:9, 1560:6, 1566:31
sorts [2] - 1449:21, 1501:8
sought [2] - 1467:23, 1569:27
soul [1] - 1481:14
source [2] - 1486:36, 1507:40
sources [3] - 1508:2, 1516:11, 1558:9
speaking [6] - 1467:43, 1480:7, 1539:44, 1540:17, 1564:28, 1568:47
speaks [4] - 1449:3, 1469:18, 1496:8, 1538:25
SPECIAL [1] - 1446:12
special [3] - 1499:21, 1499:24, 1512:29
specific [5] - 1449:45, 1451:13, 1452:13, 1452:35, 1515:6
specifically [8] - 1455:41, 1461:43, 1479:37, 1493:42, 1494:44, 1495:7, 1516:33, 1571:46
specifics [2] - 1466:13, 1488:37
speculate [1] - 1551:35
speculation [13] - 1466:16, 1466:29, 1466:33, 1466:35, 1467:2, 1467:3, 1518:1, 1551:39, 1551:42, 1551:43, 1551:44, 1551:47, 1552:4
speed [1] - 1479:32
spirit [1] - 1496:40
split [3] - 1495:19, 1495:24, 1495:40
spoken [2] - 1493:33, 1515:40
spot [1] - 1461:24
spread [1] - 1501:28
spring [1] - 1467:9
squarely [1] - 1447:30
staff [8] - 1456:47, 1563:36, 1563:40, 1564:5, 1564:10, 1564:20, 1567:34, 1568:26
stage [8] - 1452:29, 1481:14, 1486:28, 1513:16, 1525:13, 1530:21, 1533:5, 1534:32
stand [2] - 1534:22, 1553:17
start [4] - 1486:25, 1503:8, 1530:34, 1557:25
started [3] - 1505:15, 1528:44, 1564:2
starters [1] - 1455:29
starting [6] - 1455:38, 1486:22, 1486:23, 1516:9, 1516:10, 1559:29
starts [2] - 1529:43, 1551:13
state [3] - 1505:14, 1516:21, 1562:19
State [1] - 1571:31
statement [86] - 1446:44, 1446:46, 1447:3, 1447:25, 1447:28, 1448:1, 1448:44, 1450:1, 1450:14, 1452:41, 1452:43, 1455:28, 1456:9, 1461:45, 1465:42, 1466:1, 1466:2, 1467:15, 1468:21, 1468:45, 1468:46, 1469:2, 1474:19, 1478:11, 1478:35, 1486:30, 1493:41, 1493:46, 1494:1, 1494:7, 1494:8, 1494:21, 1498:37, 1498:41, 1498:46, 1498:47, 1499:1, 1499:5, 1499:8, 1499:10, 1501:47, 1503:15, 1503:16, 1503:17, 1504:33, 1504:44, 1508:14, 1508:25, 1508:26, 1508:31, 1509:22, 1509:38, 1511:10, 1512:16, 1512:17, 1512:18, 1512:20, 1514:4, 1517:10, 1522:27, 1526:24, 1527:6, 1528:47, 1529:28, 1533:30, 1535:14, 1535:38, 1536:24, 1540:6, 1540:38, 1550:47, 1556:9, 1556:11, 1556:15, 1558:46, 1559:3, 1560:36, 1562:37, 1562:43, 1562:47, 1563:5, 1565:19, 1565:44, 1567:16, 1571:15
STATEMENT [2] - 1499:13, 1563:9
statements [18] - 1486:32, 1486:35, 1486:38, 1486:39, 1486:42, 1486:46, 1487:2, 1488:11, 1492:19, 1493:29, 1494:3, 1507:16, 1507:17, 1507:32, 1507:39, 1508:21, 1508:33, 1546:20
states [2] - 1479:35, 1507:10
station [1] - 1500:26
status [4] - 1479:23, 1479:26, 1487:41, 1494:30
stay [1] - 1502:9
Steel [8] - 1450:6, 1450:18, 1461:41, 1469:4, 1470:42, 1482:45, 1506:16, 1507:18
Steel's [1] - 1488:8
Steele [1] - 1448:38
stemming [1] - 1449:23
step [3] - 1463:18, 1481:40, 1502:25
Stephens [1] - 1512:38
stepped [2] - 1478:20, 1491:8
stepping [1] - 1502:14
steps [5] - 1488:10, 1509:32, 1509:37, 1566:36, 1567:10
still [9] - 1481:8, 1516:41, 1525:3, 1525:45, 1526:25, 1543:5, 1544:10, 1549:21, 1550:46
stop [2] - 1467:17, 1508:23
stopped [1] - 1507:1
stops [3] - 1548:12, 1548:15, 1548:37
straight [1] - 1553:32
straightforward [1] - 1547:17
strategic [1] - 1511:41
strategies [1] - 1489:43
strategy [4] - 1469:15, 1488:18, 1489:45, 1489:47
straw [2] - 1547:12, 1547:18
straws [1] - 1503:33
Street [1] - 1446:26
stress [1] - 1557:16
strictly [2] - 1487:22, 1499:29
strike [2] - 1490:4, 1557:15
Strike [28] - 1447:32, 1448:39, 1450:16, 1461:35, 1479:39, 1479:47, 1480:12, 1485:5, 1487:19, 1490:27, 1509:14, 1509:18, 1509:45, 1509:47, 1510:15, 1510:18, 1510:21, 1512:1, 1512:34, 1514:19, 1523:11, 1524:2, 1524:24, 1526:14, 1541:14, 1543:32, 1544:7, 1555:26
striking [3] - 1568:10, 1570:18, 1570:23
strong [1] - 1471:1
stronger [1] - 1468:9
strongly [1] - 1473:13
subject [5] - 1461:27, 1472:1, 1489:36, 1510:32, 1556:3
subjective [1] - 1483:3
submission [1] - 1541:36
submissions [2] - 1492:24, 1492:29
submit [1] - 1485:41
submitted [2] - 1456:5, 1503:9
subsequent [1] - 1558:23
subsequently [3] - 1450:19, 1559:11, 1563:36
substance [4] - 1466:17, 1530:13, 1530:44, 1566:25
substantial [1] - 1447:32
substantive [4] - 1458:47, 1459:28, 1523:9
substantively [2] - 1459:40, 1486:15
succeeding [1] - 1548:27
suddenly [2] - 1462:24, 1462:40
sufficient [1] - 1457:26

suggest [7] - 1490:16, 1505:47, 1535:24, 1543:33, 1552:36, 1561:38, 1568:14
suggested [4] - 1451:37, 1490:13, 1562:11, 1569:27
suggesting [4] - 1448:10, 1489:12, 1510:19, 1554:46
suggestion [3] - 1449:37, 1492:18, 1561:22
suggestions [2] - 1490:15, 1493:31
suits [2] - 1531:35, 1534:31
Sullivan [2] - 1446:42, 1556:1
Sullivan's [1] - 1539:13
summary [4] - 1502:32, 1512:42, 1512:46, 1513:3
super [1] - 1510:13
superfluous [1] - 1474:44
Superintendent [4] - 1469:6, 1505:35, 1514:5, 1569:28
superior [1] - 1487:31
supervise [1] - 1509:37
supervising [1] - 1509:27
supervisory [3] - 1502:22, 1502:31, 1517:45
supply [5] - 1487:39, 1514:23, 1517:25, 1544:3, 1559:15
support [1] - 1452:30
suppose [6] - 1447:24, 1447:26, 1479:29, 1486:21, 1487:15, 1487:26
supposed [1] - 1504:34
suppressed [8] - 1453:17, 1460:20, 1473:23, 1475:2, 1480:26, 1518:15, 1520:46, 1570:47
Supreme [1] - 1446:25
surely [6] - 1456:44, 1464:20, 1468:1, 1469:46, 1477:34, 1534:16
surrendered [2] - 1467:13, 1467:18
suspect [1] - 1511:18
suspected [2] - 1471:10, 1472:11
suspicion [12] - 1471:1, 1471:33, 1471:39, 1471:43, 1472:44, 1473:8, 1473:12, 1473:13, 1474:9, 1474:15, 1481:12, 1489:30
suspicious [2] - 1478:33, 1489:13
suspicious [1] - 1474:47
sworn [3] - 1446:29, 1498:22, 1562:15
Sydney [1] - 1562:29
system [6] - 1464:2, 1474:7, 1496:8, 1496:24, 1496:31

T

tab [13] - 1463:33, 1467:31, 1493:43, 1494:14, 1494:19, 1494:21, 1494:22, 1494:24, 1494:29, 1494:30, 1524:9, 1551:4, 1558:42
tabbed [1] - 1487:29
table [3] - 1446:5, 1472:35, 1490:33
tailored [1] - 1536:8
task [1] - 1503:11
tasks [2] - 1458:11, 1538:20
Taylor [7] - 1450:7, 1461:42, 1469:5, 1469:42, 1473:13, 1482:43, 1486:10
Taylor's [1] - 1471:5
Taylor [1] - 1506:15
tea [1] - 1446:7
team [4] - 1494:26, 1502:27, 1504:30, 1557:27
telephone [8] - 1462:8, 1472:25, 1478:32, 1481:13, 1513:34, 1525:14, 1525:44, 1565:27
tend [2] - 1524:14, 1533:18
tender [4] - 1456:33, 1459:11, 1499:8, 1563:3
tendered [2] - 1446:3, 1459:21
tenor [1] - 1464:28
term [25] - 1447:16, 1447:22, 1447:23, 1447:39, 1448:36, 1449:1, 1449:6, 1449:24, 1449:26, 1450:47, 1451:24, 1451:44, 1452:18, 1464:37, 1464:38, 1464:41, 1468:18, 1490:44, 1503:11, 1526:12, 1542:6, 1543:35, 1559:40, 1560:28
termed [1] - 1526:28
terminology [1] - 1466:33
terms [46] - 1447:33, 1447:47, 1448:13, 1448:16, 1448:25, 1448:39, 1449:34, 1449:38, 1450:5, 1450:15, 1450:18, 1450:28, 1451:12, 1451:14, 1466:33, 1470:7, 1470:35, 1471:40, 1472:33, 1480:7, 1482:21, 1490:15, 1490:43, 1493:20, 1493:28, 1496:39, 1497:29, 1497:37, 1500:39, 1501:8, 1501:13, 1505:14, 1509:31, 1516:11, 1516:23, 1516:27, 1517:44, 1529:30, 1529:39, 1542:7, 1543:33, 1564:19, 1565:38, 1566:18, 1566:25, 1568:18
Terrace [1] - 1499:32
terribly [1] - 1500:20
territory [1] - 1534:47
testified [2] - 1468:6, 1480:6
text [1] - 1498:46
THE [105] - 1446:14, 1446:16, 1446:10, 1446:14, 1446:20, 1446:25, 1455:28, 1455:35, 1456:25, 1456:41, 1456:44, 1457:23, 1457:29, 1457:31, 1457:42, 1459:9, 1459:15, 1461:21, 1461:26, 1461:31, 1463:10, 1463:14, 1463:22, 1465:26, 1465:28, 1465:39, 1466:25, 1467:1, 1471:18, 1471:46, 1472:6, 1472:30, 1472:38, 1472:47, 1482:5, 1482:7, 1483:11, 1483:44, 1488:42, 1488:47, 1490:22, 1491:14, 1491:34, 1492:2, 1492:27, 1492:31, 1492:39, 1492:43, 1493:9, 1494:12, 1494:14, 1494:19, 1496:10, 1496:30, 1496:33, 1497:8, 1498:2, 1498:7, 1498:12, 1498:14, 1498:20, 1499:10, 1516:43, 1520:44, 1531:29, 1535:5, 1542:33, 1542:44, 1543:4, 1543:13, 1543:17, 1543:43, 1544:21, 1545:3, 1549:3, 1549:13, 1549:45, 1550:26, 1550:32, 1552:3, 1554:28, 1555:9, 1555:15, 1555:20, 1555:36, 1555:42, 1556:5, 1557:35, 1559:5, 1560:41, 1560:45, 1560:47, 1561:44, 1562:6, 1562:9, 1562:35, 1563:5, 1569:15, 1570:37, 1570:42, 1572:26, 1572:31, 1572:37, 1572:43, 1572:46
themselves [1] - 1447:47
there'd [1] - 1462:2
thereabouts [1] - 1493:37
therefore [3] - 1447:37, 1450:43, 1545:6
they've [1] - 1492:9
thinking [2] - 1452:12, 1528:39
third [9] - 1448:40, 1469:7, 1485:31, 1485:33, 1489:38, 1555:3, 1561:28, 1561:29, 1561:30
three [4] - 1449:25, 1488:11, 1541:1, 1551:12
three-page [1] - 1541:1
three-quarters [1] - 1551:12
threshold [1] - 1449:39
thrust [1] - 1561:36
Thursday [1] - 1446:30
tighter [1] - 1501:21
time-based [3] - 1534:34, 1536:15, 1536:16
timeline [3] - 1456:1, 1458:10, 1481:26
timely [1] - 1515:3
timing [4] - 1450:39, 1565:38, 1566:4, 1566:18
title [1] - 1479:21
TO [2] - 1446:14, 1572:46
today [2] - 1515:27, 1544:9
together [15] - 1450:18, 1451:38, 1468:14, 1468:24, 1468:28, 1468:38, 1468:42, 1469:9, 1469:20, 1469:23, 1469:44, 1469:45, 1497:26, 1538:26, 1556:16
tonight [1] - 1535:25
took [19] - 1451:4, 1451:30, 1456:27, 1459:26, 1470:16, 1480:20, 1482:7, 1484:9, 1487:45, 1493:14, 1501:37, 1502:34, 1526:11, 1537:39, 1547:27, 1557:16, 1558:36, 1560:16, 1564:1
tools [1] - 1510:6
top [5] - 1479:16, 1522:42, 1533:26, 1541:9, 1561:16
topic [6] - 1465:7, 1472:17, 1497:18, 1540:25, 1569:1, 1569:8
totality [2] - 1529:21, 1550:12
totally [1] - 1450:36
touches [1] - 1499:27
towards [4] - 1471:9, 1487:16, 1516:9, 1516:10
Townsend [15] - 1451:29, 1452:20,

1469:6, 1470:21,
1502:39, 1503:1,
1503:2, 1503:45,
1523:17, 1527:2,
1527:9, 1527:10,
1528:3, 1528:33,
1528:35
Townsend's [1] -
1451:36
track [2] - 1548:4,
1548:7
training [2] - 1452:14,
1563:36
Training [1] - 1562:26
transacted [1] -
1531:1
transcript [4] -
1479:12, 1496:16,
1511:15, 1534:38
Transcript [7] -
1453:17, 1460:20,
1473:23, 1475:2,
1518:15, 1520:46,
1570:47
transfer [9] - 1495:1,
1495:29, 1496:3,
1496:17, 1496:34,
1523:8, 1537:9,
1556:31, 1557:19
transferred [4] -
1499:31, 1500:33,
1509:23, 1564:15
transparent [1] -
1559:41
transpired [1] -
1534:43
trap [1] - 1463:28
treacherous [1] -
1549:15
Trevor [1] - 1460:2
triage [1] - 1478:3
tried [2] - 1472:3,
1483:14
TRIM [4] - 1464:2,
1464:31, 1470:17,
1503:6
Troy [4] - 1490:17,
1492:18, 1493:28,
1493:33
true [5] - 1474:24,
1483:15, 1483:18,
1499:1, 1562:47
truth [3] - 1535:22,
1553:11
try [3] - 1463:14,
1483:22, 1545:15
trying [18] - 1450:39,
1453:4, 1471:7,
1474:45, 1483:27,
1485:16, 1486:5,

1490:45, 1526:28,
1534:20, 1539:8,
1542:25, 1542:27,
1543:19, 1543:38,
1545:25, 1547:12,
1547:31
Tuesday [1] - 1484:4
turn [3] - 1506:12,
1556:22, 1565:43
turned [1] - 1551:44
twice [8] - 1532:1,
1532:11, 1535:33,
1535:36, 1535:45,
1535:47, 1536:3,
1536:6
two [22] - 1449:6,
1458:2, 1465:43,
1470:17, 1478:14,
1478:44, 1482:47,
1483:36, 1484:25,
1488:10, 1492:5,
1524:29, 1528:10,
1529:14, 1530:13,
1530:14, 1543:39,
1544:36, 1544:39,
1557:8, 1557:9,
1561:14
type [6] - 1470:43,
1488:23, 1499:29,
1501:10, 1502:31,
1552:28

U

ultimately [4] -
1451:23, 1451:43,
1554:24, 1571:32
unable [3] - 1505:22,
1544:8, 1568:37
unauthorised [2] -
1508:21, 1508:32
unclear [1] - 1531:16
uncontroversial [1] -
1450:8
under [9] - 1491:26,
1494:30, 1501:13,
1556:36, 1566:44,
1567:20, 1569:41,
1569:46, 1570:6
understood [6] -
1478:10, 1479:15,
1493:3, 1504:2,
1543:4, 1562:35
undertaken [3] -
1538:20, 1567:43,
1568:19
undesirable [8] -
1552:21, 1552:37,
1552:44, 1552:45,
1552:47, 1553:1,

1553:3, 1553:18
undesirable" [1] -
1552:42
undesirable' [1] -
1552:17
unfair [2] - 1465:31,
1553:13
unfortunately [1] -
1552:27
unhappy [1] - 1507:34
unheard [1] - 1510:5
uninterrupted [1] -
1550:22
Unit [1] - 1464:15
unknown [1] - 1485:8
unless [3] - 1448:10,
1463:28, 1468:37
unobjectionable [1] -
1456:45
unsavoury [1] -
1553:10
unstated [1] - 1452:26
unusual [10] - 1494:2,
1497:2, 1557:40,
1558:1, 1568:7,
1568:8, 1568:22,
1568:23, 1570:15,
1570:23
up [31] - 1451:4,
1461:42, 1465:14,
1472:1, 1479:32,
1483:17, 1483:19,
1483:23, 1484:16,
1486:17, 1487:16,
1489:7, 1489:18,
1492:20, 1498:43,
1500:4, 1501:9,
1522:47, 1523:31,
1523:34, 1524:8,
1525:33, 1547:12,
1547:18, 1553:17,
1553:30, 1553:37,
1556:10, 1563:41,
1564:1, 1564:10
UPON [1] - 1517:2
urgency [1] - 1540:19
urgent [1] - 1524:38
useful [1] - 1496:7
utility [1] - 1457:26

V

value [1] - 1495:5
various [11] - 1449:23,
1452:46, 1458:11,
1459:12, 1468:47,
1470:5, 1499:32,
1499:45, 1513:4,
1564:24, 1571:46

VARIOUS [1] -
1459:17
vein [1] - 1461:21
vernacular [2] -
1468:13, 1524:33
version [1] - 1556:15
victim [2] - 1482:9,
1485:42
victims [2] - 1489:43,
1553:16
Victorian [1] - 1478:17
view [14] - 1451:15,
1451:43, 1455:24,
1469:28, 1480:33,
1480:41, 1483:3,
1484:34, 1487:38,
1488:19, 1496:46,
1508:3, 1531:12,
1533:38
viewpoint [1] - 1496:1
views [3] - 1452:42,
1452:47, 1453:7
virtue [4] - 1509:23,
1524:37, 1539:16
vociferous [3] -
1472:3, 1472:33,
1472:45
voice [1] - 1505:38
voices [1] - 1505:34
volume [11] - 1453:14,
1463:32, 1492:19,
1493:43, 1493:44,
1494:12, 1494:22,
1524:8, 1550:46,
1556:10, 1558:45

W

wait [2] - 1534:27,
1553:8
waiting [1] - 1462:14
walk [1] - 1463:17
walked [1] - 1509:18
wants [2] - 1456:20,
1471:16
Waratah [2] - 1495:40,
1495:41
Wardle [1] - 1446:43
warn [1] - 1489:42
warrant [3] - 1487:10,
1488:17, 1488:20
Warwick [1] - 1446:39
WAS [1] - 1572:46
waters [1] - 1545:26
Waters [1] - 1500:34
Watters [2] - 1493:42,
1494:31
Wayne [4] - 1509:39,
1568:39, 1569:1,

1571:23
WAYNE [2] - 1446:29,
1459:19
week [2] - 1523:41,
1525:18
weekend [1] - 1526:44
weeks [1] - 1469:36
whatsoever [1] -
1531:3
whereabouts [1] -
1545:39
whilst [2] - 1505:33,
1505:38
whole [6] - 1467:15,
1484:39, 1491:28,
1491:36, 1493:7,
1531:36
wide [1] - 1467:35
willingness [1] -
1541:14
win [1] - 1552:27
Windsor [1] - 1562:29
wisdom [1] - 1504:19
wise [1] - 1524:14
wish [3] - 1499:4,
1529:47, 1552:13
wishes [1] - 1492:44
withdraw [7] -
1465:30, 1465:37,
1466:23, 1523:32,
1531:24, 1550:9
withdraws [1] -
1492:35
WITHDREW [3] -
1498:14, 1562:9,
1572:37
withheld [1] - 1547:26
witness [57] -
1446:17, 1447:11,
1456:20, 1456:27,
1456:45, 1456:46,
1459:22, 1466:20,
1471:43, 1472:24,
1473:1, 1486:25,
1486:30, 1490:13,
1490:34, 1490:43,
1490:47, 1491:17,
1491:18, 1492:11,
1492:44, 1493:13,
1494:3, 1496:5,
1496:6, 1496:22,
1496:23, 1496:30,
1498:33, 1517:5,
1522:27, 1522:39,
1524:7, 1529:8,
1529:32, 1530:8,
1534:47, 1542:6,
1542:9, 1543:10,
1544:18, 1544:25,
1547:31, 1548:35,

1549:11, 1549:17,
1549:40, 1550:12,
1550:21, 1550:47,
1555:5, 1555:47,
1557:22, 1561:17,
1562:12
WITNESS [17] -
1456:41, 1457:23,
1457:31, 1457:42,
1465:26, 1466:25,
1482:7, 1494:12,
1496:33, 1498:12,
1498:14, 1543:43,
1549:3, 1560:41,
1560:47, 1562:9,
1572:37
witness's [2] -
1491:21, 1559:3
witnessed [1] -
1532:46
witnesses [5] -
1494:4, 1542:19,
1543:24, 1545:13,
1557:45
wonder [1] - 1564:19
wondering [2] -
1459:5, 1494:2
word [6] - 1484:5,
1509:4, 1544:14,
1552:44, 1561:37,
1570:17
worded [1] - 1467:21
wording [1] - 1451:14
words [5] - 1469:27,
1484:13, 1485:38,
1543:37, 1560:27
workload [1] -
1524:34
works [2] - 1478:39,
1495:47
world [2] - 1451:43,
1553:27
worry [1] - 1511:19
worse [1] - 1549:19
worth [1] - 1465:34
wrap [1] - 1472:1
wrap-up [1] - 1472:1
wrapped [1] - 1524:34
written [2] - 1470:41,
1492:23
wrote [2] - 1466:28,
1483:15

Y

year [3] - 1498:38,
1500:4, 1537:46
years [1] - 1499:32
yesterday [24] -

1446:42, 1451:30,
1462:7, 1462:36,
1463:36, 1464:22,
1465:19, 1465:22,
1465:24, 1465:44,
1468:6, 1470:16,
1471:28, 1473:15,
1477:44, 1478:46,
1480:4, 1482:37,
1483:1, 1483:13,
1487:6, 1492:46,
1524:14, 1546:12
York [35] - 1451:42,
1462:25, 1478:15,
1479:31, 1487:32,
1502:40, 1503:1,
1504:11, 1504:23,
1504:24, 1505:19,
1512:30, 1512:45,
1513:3, 1527:1,
1527:9, 1527:10,
1527:17, 1527:20,
1527:37, 1527:40,
1527:41, 1528:2,
1528:22, 1541:2,
1541:8, 1554:9,
1554:17, 1554:19,
1554:24, 1554:26,
1563:41, 1563:44,
1564:1, 1564:6
York's [2] - 1504:27,
1504:28
you,Mr [1] - 1459:15
yourself [2] - 1508:31,
1571:23