

Wednesday, 27 September 2023

(10.00 am)

ANNE OLIVIA CHAMBERS (continued)

Questioned by MR BEER (continued)

MR BEER: Good morning, sir, can you see and hear me?

SIR WYN WILLIAMS: Yes, I can.

MR BEER: Apologies for the delay, we had a very thorough fire drill this morning.

Good morning, Mrs Chambers.

A. Good morning.

Q. Can we start, please, with the piece of homework that I think we set ourselves and, just to remind ourselves of some context, can we start, please, with LCAS0000224. This was the document we were looking at, if you remember?

A. Yes.

Q. You told us this was an extract, I think, of some ARQ data?

A. It appeared to be, yes.

Q. You noted that the selection that had been made at the top under "Keys" required this to be in date and time -- chronological order and the data wasn't --

A. Yes.

1

whole of the page, please. Thank you. That makes it not particularly legible but we can see what it is and, if we just go to the next page, please, we can see that that data, I think, ends on 8 January?

So if we go back to the first page, please, and expand, please, so we can see better. Thank you. Is this also ARQ data?

A. Yes.

Q. Does this appear to be a more complete record of ARQ data --

A. Yes.

Q. -- and does this appear to be ordered in ascending date and time order?

A. Yes.

Q. Okay. Can we scroll down, please. Can you see an entry about 12 lines -- I'm not sure we're on the right page.

A. Is it a little further up?

Q. It's the first page, please. We're on the second page at the moment. So the first page, please. Thank you. Then scroll down, thank you, and scroll down some more, please.

Can you see an entry --

A. Yes, I can.

3

Q. -- and that it wasn't a complete record, because there were lots of things that weren't on it?

A. Yes.

Q. The first thing to say is that we've researched the document. The document was also provided to us by Fujitsu in printed copy and in Excel format and the Excel document is in exactly the same format as this. So if any manipulation -- I think you used that word neutrally -- had been done, it had been done before it left Fujitsu?

A. Can I just say, though, that we do have a document which has got all this data in.

Q. Yes, I am going to move to that in a moment.

A. Okay.

Q. It was just to clear up the point, in case anyone thought that, because this was produced with LCAS, a Lee Castleton number, putting two and two together with what you said about manipulation, anything had gone on there. We have exactly the same document, in printed and in Excel format, from Fujitsu?

A. That certainly was not my intention --

Q. I know but I need to clear these things up.

Can we look then, please, at LCAS0001322. If that can just be expanded so we can see the

2

Q. "Declare stamp total 118,322", yes?

A. Yes.

Q. That's the same as on the extract, as I'm going to call it, that we looked at yesterday --

A. Yes.

Q. -- but different from the figure in the cash account total?

A. Yes.

Q. That seems to have been declared at 17.06.59; can you see that?

A. Yes, yes.

Q. Then is there anything else relevant on that page? I'm not sure that there is.

A. No.

Q. Then go over the page to the next page, please. Can you see about 12 lines in, "ONCH total, 43,013.92" --

A. Yes.

Q. -- at 17.31.20?

A. Yes.

Q. What does that mean?

A. That's the Overnight Cash Holding Declaration, so they should, at that point, have counted what cash they'd got and declared it for the -- as an ONCH declaration. That was something they

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1 had to do at the end of each day.
 2 **Q.** Yes. Can you see about three lines in to the
 3 second piece of highlighting "Declare cash total
 4 £43,013.92", so the same figure, yes?
 5 **A.** Yes, I can.
 6 **Q.** It says, "Declaration complete". What does that
 7 mean?
 8 **A.** They've done a proper cash declaration at that
 9 point. That was something they only had to do
 10 once a week, as part of the balancing process
 11 but you'd expect it to be the same figure as the
 12 Overnight Cash Holding for that day.
 13 **Q.** And it is?
 14 **A.** Yes.
 15 **Q.** We then see "Report cash declared" at 17.38.43,
 16 "Report printed". So is that them in the branch
 17 printing off a copy of the cash report?
 18 **A.** That's the printing off of a copy of the cash
 19 declaration report. So that will show what
 20 they've declared by denomination of cash because
 21 that's how it was done.
 22 **Q.** Then next entry "Declare cash total", it's gone
 23 up by about £300; can you see that?
 24 **A.** I can see that.
 25 **Q.** Then that is printed --

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1 cash account. I think I say in my witness
 2 statement that the cash account was a horrible
 3 document to try to understand, partly for this
 4 reason, but if you look at the final balance
 5 report, which precedes the cash account and is
 6 using the same data that the cash account is
 7 built from, you can see on that final balance
 8 report the section for postage, which includes
 9 both the postage stamps as declared and all the
 10 other types of postage. And if you want to look
 11 at that, I can give you a reference.
 12 **Q.** It's okay, I've got that.
 13 **A.** You've got that.
 14 **Q.** So, in short, this more expanded set of data
 15 doesn't tell you anything that we didn't know
 16 last night?
 17 **A.** No.
 18 **Q.** You've just remembered something?
 19 **A.** Just by looking at that final balance report, it
 20 reminded me.
 21 **Q.** Thank you. Yes, that can come down.
 22 Can we turn up -- I'm coming to the closing
 23 of the PEAK now. Can we have up, please,
 24 FUJ00146165. Thank you. This is the PEAK that
 25 we were looking at yesterday in relation to your

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1 **A.** Yes.
 2 **Q.** -- a couple of seconds later?
 3 **A.** Yes.
 4 **Q.** Then "Declare stamp zero"?
 5 **A.** Yes, I can see that.
 6 **Q.** I couldn't see, on here, a record of the stamps
 7 held in stock of the £5,500-odd?
 8 **A.** No, and I can now explain why that was.
 9 **Q.** Yes, please.
 10 **A.** Okay. When the postmasters declared stamps,
 11 this was just the stamps that were 1p, 2p,
 12 that -- stamps that have a specific denomination
 13 on them. So they would be presented with
 14 several screens and they go through and say how
 15 many of each denomination they've got, so that
 16 is their stamp declaration.
 17 Other types of postage, including First and
 18 Second Class stamps and stamp books, and some
 19 other things, were not included in that
 20 declaration. They would be managed either by
 21 "declare stock" or by "adjust stock", which is
 22 what Mr Castleton did. So this stamps --
 23 postage stamps total that we've got is only for
 24 a subset of the overall postage.
 25 We can see that it's not at all clear on the

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1 investigation and can we turn to page 2, please,
 2 and look at the foot of the page. Can we look
 3 at your entry of 15.16.54. This is essentially
 4 your closing entry on the PEAK; is that right?
 5 **A.** Yes, it is.
 6 **Q.** I don't think we've read this but we ought to
 7 read this because it forms the substance of the
 8 evidence that you give in your witness
 9 statement, both in the civil proceedings in 2006
 10 and in your witness statement to this Inquiry.
 11 You say:
 12 "Checks are ok. Cheques are being handled
 13 correctly (except for [the 10th] when the clerk
 14 forgot to cut off the report -- but this didn't
 15 cause a discrepancy). Cash declarations look
 16 ok, they usually use drawer ID 11. Occasionally
 17 they have a different drawer ID, this can lead
 18 to amounts apparently doubling on the cash flow
 19 report, and should be avoided."
 20 Can you explain what you meant by that,
 21 please?
 22 **A.** If they declare the same cash with two different
 23 drawer IDs then when the Overnight Cash Holding
 24 figure is sent off to the central systems, that
 25 will add those amounts together. So if they've

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1 declared it with drawer ID 11 and 22, for
2 example, and in both cases £10,000, then the
3 total for the day will appear to be £20,000, and
4 that's what will be sent to the cash handling
5 centre but those figures are not used in the
6 balancing process.

7 **Q.** That's why you said, "but again it will not
8 cause a discrepancy"?

9 **A.** Yeah.

10 **Q.** Why will it not cause a discrepancy?

11 **A.** Because these figures aren't input to the
12 balancing process.

13 **Q.** You continue:

14 "Checking the cash transactions on the
15 system against the declarations shows they are
16 not working particularly accurately ..."

17 The "they" in that sentence, who is that?

18 **A.** The branch.

19 **Q.** "... (ie at the end of the day the cash they
20 declare in the drawer is tens, hundreds or
21 thousands of pounds astray from what has been
22 recorded on the system)."

23 **A.** Yes.

24 **Q.** "It is possible" --

25 So how did you establish that?

9

1 have investigated and that the discrepancies are
2 caused by the difference between the
3 transactions they have recorded on the system
4 and the cash they have declared, and are not
5 being caused by the software or hardware."

6 Then just over the page, please:

7 "I have checked various things on the
8 system. All the internal" --

9 I'm so sorry, I think that's a repetition of
10 a message, isn't it?

11 **A.** Yes, I'm not sure why that's there.

12 **Q.** That's essentially the first sentence of your
13 15.16 entry repeated.

14 **A.** Yeah.

15 **Q.** In any event, you then essentially close the
16 call --

17 **A.** Yes.

18 **Q.** -- and give it a category number, "Advice and
19 guidance given"?

20 **A.** Yes.

21 **Q.** Is that advice and guidance given back to the
22 HSH?

23 **A.** That was just the closure category that I chose
24 to use.

25 **Q.** Yes, but what does it mean?

11

1 **A.** I established that by pulling out all the cash
2 transactions for a period -- and I now cannot
3 remember the precise length of that period -- by
4 taking the opening figure of cash, which you can
5 cross-check on the balance reports, and so on,
6 so you put that at the top of your column in
7 an Excel spreadsheet and then you work out the
8 running total by making all the cash adjustments
9 from that base figure, so at any point you can
10 see what cash the system thinks the branch
11 should hold.

12 Then from the Overnight Cash Declarations
13 and also the declarations made when they
14 balanced, you can see what the branch is
15 declaring that they hold and then it's simple
16 arithmetic to look for the difference between
17 those figures.

18 **Q.** You say:

19 "It is possible that they are not accurately
20 recording all transactions on the system. There
21 is no evidence whatsoever of any system problem.
22 I've mentioned this outlet to Julie Welsh
23 (Customer Services) who will try to get [the
24 Post Office] to follow it up, but in the
25 meantime please tell the [postmaster] that we

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1 **A.** It just means that I felt, out of all the
2 closure categories open to me, that was the best
3 one that meant I had given advice, that I had
4 written down, as in this case, some advice and
5 guidance to be passed back to the postmaster.

6 **Q.** Through the HSH?

7 **A.** That would be the normal route but, although --
8 I had said in my response, I was also passing it
9 back to Post Office via Julie Welsh.

10 **Q.** Time -- it says:

11 "Hours spent since call received: 0 hours."

12 Why does it record that?

13 **A.** Because that wasn't a field that we ever used.

14 **Q.** Okay, you didn't record how long it took you to
15 do things?

16 **A.** No.

17 **Q.** Okay. Then the call was closed?

18 **A.** Yes.

19 **Q.** Can we turn up your witness statement, please,
20 at WITN00170200, and look at page 14, please.
21 Can we read together paragraphs 41 and 42 to
22 start with. You say:

23 "I felt that the only way to progress the
24 investigation was at the branch, to check they
25 were following the correct business processes

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1 and correctly recording everything that was
2 done. Fujitsu did not have staff who were
3 allowed to go to branches to investigate
4 business or financial problems; this was Post
5 Office's responsibility.

6 "At this point, having not found any
7 evidence of a system error, the correct process
8 was for me to close [that's the PEAK we've just
9 looked at] with my findings, and HSH would
10 communicate them to the [subpostmaster].
11 However, given the number of calls that
12 Mr Castleton had already raised, I felt this was
13 not in his best interests, as the problem
14 persisted, and so I contacted Julie Welsh in
15 Customer Services, knowing that she had a route
16 to the Post Office and hoping that this would
17 help Mr Castleton to find the cause of the
18 losses. Then I closed [the PEAK] 'Advice and
19 guidance given', stating what I had found and
20 that I had contacted Julie Welsh."

21 Then if we turn to paragraph 51 of your
22 witness statement on page 17, please -- 51,
23 thank you -- you say:

24 "I did consider the issues that Mr Castleton
25 was reporting to be unusual, and that he needed

13

1 I didn't know what the options were as
2 I said, this -- Fujitsu hadn't -- had no way of
3 helping with anything like that at branches.

4 **Q.** So why did you think it wouldn't be in
5 Mr Castleton's best interests just to close the
6 call and let the Helpdesk report your findings
7 back to him?

8 **A.** Because then it would just have gone back
9 saying, "Not a system error, talk to NBSC", and
10 NBSC would have said, "Oh, well, we can't find
11 anything, talk to the Helpdesk", and --

12 **Q.** It would have gone back into the big machine?

13 **A.** Yes, he had already obviously spent an awful lot
14 of time on the phone trying to get somebody to
15 take some notice.

16 **Q.** What did you expect Julie Welsh in Customer
17 Services to do?

18 **A.** I knew that she had somebody in Post Office that
19 she talked to about -- well, I mean, it was part
20 of her role, I think, to coordinate with Post
21 Office, although I wasn't entirely sure on what
22 level. She was one of these helpful sort of
23 people, so I asked her if she could pass the
24 information on to Post Office.

25 **Q.** So she's in Fujitsu's Customer Services --

15

1 assistance to get to the bottom of it. I was
2 not in a position to give or organise that
3 assistance."

4 **A.** Yes.

5 **Q.** The way that you set matters out in those three
6 paragraphs, 41, 42 and 51, may suggest that you
7 didn't think that, because you couldn't find
8 a system error, Mr Castleton or his staff must
9 have either taken the money or have been
10 responsible for the missing money. There was
11 a business or a process issue that still
12 required to be investigated?

13 **A.** Yes. I mean, it wasn't for me to decide what
14 was wrong but, from what I could see, that --
15 the way the figures were swinging around so much
16 each day, that was really unusual, and so -- and
17 I could see from the calls that Mr Castleton was
18 raising that he was desperate for somebody to
19 help, and I wanted to try to, you know, progress
20 it -- I certainly didn't just want to send the
21 call back saying, "Oh, not us". I wanted to see
22 if we could get him some more help, maybe so
23 that he could do -- to help him sort of keep --
24 try and keep a manual record or for somebody to
25 monitor what was happening.

14

1 **A.** Yes.

2 **Q.** -- but she had a line in to the Post Office --

3 **A.** Yeah.

4 **Q.** -- almost outside of the Helpdesk and NBSC
5 machine?

6 **A.** Yes.

7 **Q.** So you didn't know exactly what she might do
8 but, being a helpful person, you thought she
9 might have some influence or connections?

10 **A.** I thought she would probably pass my findings on
11 to somebody within Post Office who would then be
12 able to take further action as they thought
13 appropriate.

14 **Q.** You'd said in the entry on your PEAK -- I'm not
15 going to go back to it -- but you passed it to
16 her "to try to get POL to follow it up". What
17 could POL do to follow it up, in your mind?

18 **A.** Go to the branch and, as I said, maybe help him
19 try and run a manual process alongside to
20 record, so that you could, at the end of the
21 day, look for any anomalies, you know, if there
22 was something that they were doing wrong
23 process-wise, to find that.

24 You know, at this stage, I sort of assumed
25 that Post Office did have people who were -- who

16

1 would do that sort of role.

2 **Q.** Were you referring it to Julie Welsh in order
3 that the next step could be an audit accompanied
4 by an immediate suspension on the day?

5 **A.** That was certainly not in my mind, no.

6 **Q.** That can come down, thank you.

7 Can we move forwards, please, to you giving
8 evidence and you being selected as a witness.
9 Can we start, please, by looking at POL00090437,
10 page 69, please. Thank you.

11 We can see that this is a letter from Rowe
12 Cohen Solicitors, dated 25 July 2006 to the Post
13 Office's solicitors, Bond Pearce, about the case
14 of *Post Office v Mr Castleton*.

15 **A.** Yes.

16 **Q.** It's a two-page letter, yes?

17 **A.** Yes.

18 **Q.** I think you were asked to review this; is that
19 right?

20 **A.** Yes, I believe so.

21 **Q.** If we scroll through it and you just read it to
22 yourself as we scroll through it, to refresh
23 your memory. If you look, in particular, at the
24 second, third, fourth and fifth paragraphs.

25 **A.** Yes, I certainly saw this at the time, whether

17

1 page, please, and to the bottom, we can see that
2 it's your document?

3 **A.** Yes, that's right.

4 **Q.** Yes?

5 **A.** Yeah, yeah.

6 **Q.** Then back to the first page, please. You go
7 through parts of the letter, yes?

8 **A.** Yes, I do, yes.

9 **Q.** If we look at the fourth paragraph on the page
10 there, you say:

11 "Looking in the full message store at the
12 first of these ..."

13 **A.** Yeah.

14 **Q.** What are you referring to there "the first of
15 these"?

16 **A.** By "the full message store", at this point
17 I mean the archived messages -- sorry, audited
18 messages for Marine Drive over this period. So
19 at the time, back in 2004, all messages produced
20 at Marine Drive and everywhere else would have
21 been sent off into the audit files, from which
22 subsequently the ARQ data could be extracted.
23 But it was also possible just to look at the
24 full set of messages, rather than the specific
25 messages in -- that were -- that formed the ARQ

19

1 I -- and then we did some work as a result of
2 this letter, which isn't -- yeah.

3 **Q.** Can you remember who asked you to look at it?

4 **A.** I think probably this came through Gareth
5 Jenkins but it's possible that Brian Pinder or
6 somebody else would have showed it to me, but
7 I really I can't remember.

8 **Q.** Can we look, please, at -- so, essentially, I'm
9 going to summarise it. It was said by
10 Mr Castleton's solicitor that some analyses had
11 been conducted of some weeks, week 42 in
12 particular, and Mr Castleton believed there were
13 some incomplete transactions and other
14 discrepancies, yes?

15 **A.** Yes, yes.

16 **Q.** Can we look, please, at FUJ00152295. Can we
17 see, please the title at the top "Initial
18 Comments on Marine Drive letter", yes?

19 **A.** Yes.

20 **Q.** I think that's a reference to the letter we've
21 just looked at?

22 **A.** Yes.

23 **Q.** We can see this is dated 17 August 2006?

24 **A.** Yes.

25 **Q.** Can you see that? Then if we go to the second

18

1 extracts.

2 **Q.** Thank you. You say:

3 "... I found the missing transaction was
4 a stamp sale within a Smartpost session, and the
5 Start information had not been included in the
6 message."

7 **A.** Yes.

8 **Q.** Can you explain what you mean by that, please?

9 **A.** Yes, because there were two sessions that didn't
10 net to zero in the ARQ data --

11 **Q.** You wanted to know why?

12 **A.** I wanted to know why, yes, and it turned out to
13 be that there was a line, a transaction line in
14 the full message store that had not been
15 included in the ARQ extract.

16 **Q.** Is that a bug?

17 **A.** It was a bug in the ARQ -- well, it was a bug
18 whose only consequence was in the ARQ extract.

19 **Q.** You say:

20 "This was a not uncommon problem at the
21 time."

22 **A.** It was something that did show up in the
23 reconciliation reports, which I hadn't seen the
24 January ones because they no longer existed when
25 I'd looked originally. And I can't quite

20

1 remember but perhaps every few days you might
2 have one or two entries in the reconciliation
3 reports. This was for all 18,000 branches, so
4 it wasn't that it was happening every day for
5 every branch, but it was a problem that we knew
6 about and had been looked at, and the only
7 problem was that these particular smart mails,
8 Smartpost transactions were slightly malformed,
9 in that the start date attribute was missing,
10 which should have been they're.

11 Now, that didn't affect balancing in the
12 least but, because the ARQ extract extracted on
13 start date and it didn't have a start date, it
14 didn't find these. But they were included in
15 the branch balance.

16 **Q.** Which is what you say next:

17 "The transaction was included in all the
18 accounts (otherwise there would have been
19 a receipts and payments mismatch), and did not
20 cause any discrepancy at the branch but has not
21 been retrieved from the archive by the data
22 retrieval, since that requires Start date to be
23 present (see the query at the beginning of the
24 transaction log spreadsheet)."

25 Then you say, "Possible further action", if
21

1 that I didn't know about.

2 **Q.** Okay, and then (c):

3 "confirm in some way that no complete
4 sessions are missing for the same reason."

5 Yes?

6 **A.** Yeah.

7 **Q.** So, to summarise, there was a small discrepancy
8 caused by a missing Smartpost stamp sale, yes?

9 **A.** It's not a discrepancy.

10 **Q.** Sorry --

11 **A.** A difference.

12 **Q.** -- a difference, thank you, on the data. That
13 wasn't an uncommon problem at the time but there
14 would be a daily report which would or should
15 confirm whether or not that difference was
16 picked up at the time --

17 **A.** Yes.

18 **Q.** -- and that there might be a way formally to
19 check whether any complete transactions were
20 missing as a result of the known fault?

21 **A.** Yes.

22 **Q.** Okay. So they were your suggestions for further
23 action or possible further action?

24 **A.** Yeah.

25 **Q.** Can we look, please, at WBON0000027. Thank you.

23

1 we just scroll down:

2 "(a) confirm second instance is the same (so
3 far only have CAP42 complete messages)."

4 I don't understand what that means. Can you
5 explain please?

6 **A.** The whole message store extract, rather than
7 just the ARQ data. At the point I wrote this,
8 I'd only got the complete set for CAP42, for
9 week 42.

10 **Q.** I see:

11 "retrieve the TPSC253 report for the days
12 (Counter Exceptions), which should show the
13 problem was noticed at the time. MSU and SSC no
14 longer have this report but maybe we can get it
15 back through the Audit team."

16 **A.** Mm.

17 **Q.** Can you explain what you were suggesting there?

18 **A.** This was the reconciliation report I was talking
19 about, that we only kept for a very short length
20 of time. That's suggesting that maybe it was
21 a file that was audited that we could have
22 retrieved. As I've said, SSC knew nothing,
23 really, about audit and didn't know which files
24 were retained. I'm obviously wondering there
25 if, actually, it's something that they did have

22

1 Your document was turned into a report written
2 by, I think, you and Mr Jenkins; is that right?

3 **A.** Yes, he took responsibility for it. Yes.

4 **Q.** But this is jointly authored; is that right?

5 **A.** He authored it but it is based on stuff that I'd
6 investigated.

7 **Q.** Okay, and this is it, yes?

8 **A.** Yes.

9 **Q.** If we can read the first part of paragraph 1:

10 "As part of a prosecution associated with
11 Marine Drive Post Office ..."

12 Did you understand that Mr Castleton was
13 being prosecuted?

14 **A.** Yes, at this point, because I'd already had to
15 produce a witness statement.

16 **Q.** What would you understand by prosecuting?

17 **A.** That he was being taken to court, I suppose.

18 Yes, my legal knowledge is not very good.

19 Perhaps it's the wrong word. I don't know,

20 I didn't write -- I have no idea if that's right

21 or not.

22 **Q.** In your mind, was there a distinction between
23 a criminal court and a civil court?

24 **A.** Yeah, I think I knew there was a difference and

25 I knew that he was not being charged with any

24

1 criminal offence but Post Office were wanting to
 2 get the money that they believed was owed to
 3 them and that it was a civil matter.
 4 **Q.** "... Anne Chambers and Gareth Jenkins have
 5 undertaken an analysis of all transactions that
 6 took place during Cash Account week 42 in that
 7 Office."
 8 **A.** Yes.
 9 **Q.** Those transactions are between dates and times
 10 set out, yes?
 11 **A.** Yes.
 12 **Q.** "The purpose of this note is to outline what was
 13 done and also comment on the letter sent on from
 14 the Post Office solicitors where Mr Castleton is
 15 claiming to have shown that the Horizon figures
 16 are incorrect."
 17 Then scroll down to "Analysis undertaken":
 18 "The initial set of data obtained was the
 19 extract from the Transaction Log that was
 20 submitted to Post Office as supporting evidence
 21 (ARQ 421)."
 22 What does the number refer to?
 23 **A.** I think each ARQ request had a unique number.
 24 **Q.** I see:
 25 "Subsequently a complete extract of audit
 25

1 **A.** Yes.
 2 **Q.** "This transaction did not include its Start Time
 3 (a known fault that occasionally happens) and so
 4 the ARQ extraction process ignored it. However
 5 it would not have been ignored by the accounting
 6 functions at the counter and a report would have
 7 been generated that night as part of the
 8 overnight checks.
 9 "Unfortunately, this report is not audited
 10 and so is not available for examination.
 11 However, we do not believe that this report is
 12 material to the case."
 13 So the idea of doing the three checks that
 14 you mentioned seems to have been dropped,
 15 doesn't it?
 16 **A.** I don't think so. I cannot remember but it
 17 could well be that, by the time that Gareth
 18 wrote this final version, he had checked with
 19 the audit team and they had said, "No, that file
 20 is not audited or available anywhere", which is
 21 what -- that's what he's saying there.
 22 I wouldn't have -- I don't know.
 23 The other checks --
 24 **Q.** Just hold on. On what basis were you saying
 25 that -- you are now saying that this report,
 27

1 data for the period concerned was obtained.
 2 This included non-transactional data (including
 3 opening figures) and the electronic Cash Account
 4 information (which was subsequently submitted to
 5 Post Office Limited's back end systems) and
 6 represents the same information as was printed
 7 on the paper cash account which Mr Castleton
 8 signed at the time to indicate that it was
 9 correct.
 10 "The figures examined have been [completed]
 11 with both the electronic Cash Account
 12 information retrieved and also copies of the
 13 paper cash accounts for week 42 (and also weeks
 14 41 and 43) ... Specifically, the Carried Forward
 15 figures from Week 41 matches the Brought Forward
 16 figures in Week 42 and the Carried Forward
 17 figures from Week 42 matches the Brought Forward
 18 figures in Week 43.
 19 "The initial check was that each Session's
 20 data was completely recorded in the Transaction
 21 Log. This check identified a transaction
 22 missing from the ARQ 421 data for a value of 92p
 23 on 12 January."
 24 That's referring to the issue you picked up
 25 in the paragraphs we have just looked at?
 26

1 which you'd previously wished to see, is not
 2 material to the case?
 3 **A.** I don't know quite why Gareth put that sentence
 4 in there.
 5 **Q.** Did you see this report before it went out?
 6 **A.** I probably did. I mean, it -- I don't think it
 7 would have shown any further light on the -- any
 8 of the losses or anything because all the report
 9 would have shown was that a single transaction
 10 with a missing start date had been picked up on
 11 that day, and we already knew from the full set
 12 of data that, yes, there was a transaction with
 13 the missing start date on that day.
 14 **Q.** You'd previously made three suggestions.
 15 **A.** Yes.
 16 **Q.** It appears that two of them hadn't been pursued.
 17 **A.** I don't think that's -- I mean, I don't think
 18 there's any -- anything in there that suggests
 19 that the other two were not pursued.
 20 **Q.** Why were you -- why was it the case that they
 21 were -- the results of those checks, if they had
 22 been conducted, are not reflected in this
 23 document?
 24 **A.** Because -- I think because we found nothing, so
 25 there was nothing to say. I obviously cannot
 28

1 now prove that I did those other things but,
 2 knowing how thoroughly I went into everything,
 3 I think it's very likely that I -- sorry, I now
 4 can only remember what one of the checks was but
 5 I was checking everything that occurred to me.
 6 If I'd checked but found nothing else of
 7 concern, then that might not have been recorded
 8 in this document.

9 **Q.** Thank you. That document can come down.
 10 We've heard evidence from your then line
 11 manager Mik Peach that before you were asked or
 12 requested to provide evidence in the *Lee*
 13 *Castleton* case, another person at Fujitsu within
 14 the Security team, whose function or
 15 responsibility it was ordinarily to give
 16 evidence in a case such as Mr Castleton's, had
 17 declined to give evidence at court.

18 **A.** I --

19 **Q.** I'm just summarising what Mr Peach has told the
 20 Chairman?

21 **A.** I had no knowledge of that.

22 **Q.** I was about to ask. Did you know that another
 23 person within the Security team had declined to
 24 give evidence --

25 **A.** No.

29

1 evidence in court and here today.

2 **Q.** Somebody from Security asking you whether you
 3 would mind speaking to a solicitor --

4 **A.** Mm.

5 **Q.** -- and you saying, "Yes, I suppose so" --

6 **A.** Mm.

7 **Q.** -- doesn't sound like pressure?

8 **A.** It just seemed to be an odd situation because
 9 then my manager was very cross about it all and
 10 I didn't know if it was me having said yes to
 11 that initial question, somehow had led to
 12 everything else that happened and, if I'd said
 13 no, would it have been different? I don't think
 14 that is the case now but now I know a lot more
 15 about the background of it.

16 But, at the time, I just felt very
 17 uncomfortable about it and there seemed to be
 18 a lot of people not very happy with the
 19 situation and so, yes, it was just
 20 uncomfortable. I don't think I was ever given
 21 the opportunity to say "No, I'm not prepared to
 22 do this", and I don't know what would have
 23 happened if I had turned around and said no.
 24 I've always, you know, attempted to do my job
 25 and to be helpful and to answer questions as

31

1 **Q.** -- in Mr Castleton's case --

2 **A.** *(The witness shook her head)*

3 **Q.** -- and, therefore, you couldn't help us as to
 4 who that person was or why they had declined to
 5 give evidence?

6 **A.** No, I couldn't.

7 **Q.** Mr Peach told the Chairman that you were
 8 pressured to give evidence and to go to court,
 9 and that you were pressured to give evidence and
 10 go to court because the person from the Security
 11 team had refused to give evidence and to go to
 12 court. Were you pressured into giving evidence?

13 **A.** I'm not sure I was pressured; I was extremely
 14 surprised to find myself in a position where
 15 I had to, because it had never occurred to me or
 16 any of my colleagues that this might be part of
 17 our role supporting an IT system.

18 I just felt that it was all sort of handled
 19 rather strangely and that I was asked by this
 20 guy I didn't know, who turned out to be -- who
 21 was the Security Manager, if I'd be prepared to
 22 speak to a solicitor, and I -- about this
 23 particular matter and I said, "Well, I suppose
 24 so", and there was no mention at that point
 25 that, just by doing that, I would end up giving

30

1 necessary.

2 **Q.** Were you aware at the time that Mr Peach, your
 3 manager, had an argument about you having to
 4 give evidence, in a corridor with either Dave
 5 Baldwin, the Customer Services Director and
 6 Naomi Elliott, the Support Services Manager, or
 7 Brian Pinder from the Security team?

8 **A.** I wasn't aware of it at the time but it doesn't
 9 surprise me.

10 **Q.** Why doesn't it surprise you?

11 **A.** Because Mik was very angry about one of his team
 12 being put in this position that he thought they
 13 should not have been put in.

14 **Q.** So the argument wasn't reported back to you at
 15 the time?

16 **A.** I -- not that I'm aware of, no. I know he was
 17 talking to his management about this.

18 **Q.** Mr Peach told us that, following the argument,
 19 he had a choice to select anyone from within the
 20 SSC to give evidence and that he chose you
 21 because you were the most experienced and
 22 technically best within the SSC in the relevant
 23 area of counter code that he -- you had dealt
 24 with a call back on 26 February 2004 and he had
 25 confidence in your honesty and integrity. That

32

1 makes it sound like he is picking you?

2 **A.** Yes, I wasn't aware of that. I assumed it was
3 me because I'd looked at the call in 2004.

4 **Q.** Can we look, please, at your witness statement,
5 please, at page 18, and paragraph 56. If we
6 scroll down, please -- and a bit more, thank
7 you.

8 If we just read these, from 56 to 59 to see
9 the account that you give:

10 "I have not been involved in any other
11 proceedings against subpostmasters involving the
12 Horizon IT System before or since the *Castleton*
13 case. Before 2006 I had never taken part in any
14 legal proceedings of any kind. It had never
15 been suggested to me or my SSC colleagues that
16 we might be expected to become involved in such
17 proceedings as a result of the work that we were
18 doing.

19 "On a few occasions over the subsequent
20 years Gareth Jenkins asked me to double check
21 his figures or help him locate KELs or reports.
22 I was aware he was giving evidence in various
23 trials but I do not think I ever knew the
24 details of those trials and the assistance
25 I provided to him would have been limited.

33

1 him raising it with higher levels of management,
2 rather than management speaking with him and him
3 choosing you.

4 **A.** That was my -- how I thought it was, until
5 I read or saw what Mik said in evidence to the
6 Inquiry.

7 **Q.** Has your recollection altered at all in the
8 light of what Mr Peach has said to the Inquiry?

9 **A.** No, I don't think so, except possibly his
10 reaction now is a little bit more
11 understandable.

12 **Q.** Your recollection is they came direct to you,
13 then you went to Mr Peach?

14 **A.** Yes, Brian Pinder most definitely came and
15 talked to me and then I mentioned it. So
16 whether -- I'm assuming now that Mik knew that
17 they were likely to want to talk to me but he
18 was probably very cross then that they had
19 actually come straight to me, rather than go
20 through him.

21 **Q.** Can we just look at your afterthoughts document
22 because this I think helps us a little bit on
23 this issue. FUJ00152299.

24 We're going to look at this in more detail
25 a little later this morning but if we just turn

35

1 I have no specific recollection of any
2 particular instances of this occurring.

3 "I am asked who asked me to provide
4 a witness statement in the case against
5 Mr Castleton. Sometime in 2006, a man I did not
6 know came into our secure office area,
7 introduced himself as the Post Office Account
8 Security Manager, Brian Pinder, mentioned a call
9 I had dealt with over two years earlier and
10 asked if I would mind having a quick chat with
11 a solicitor about it. No mention was made of
12 a witness statement at that point nor, as
13 I recall, of a court case.

14 "I informed my manager [Mr Peach] of this
15 conversation. He was extremely unhappy that
16 I had been approached directly and said that no
17 member of SSC should be involved in litigation.
18 He then talked to higher levels of management,
19 but my name was now in the frame and I seemed to
20 have no option but to talk to the solicitor
21 which led to them requesting a witness statement
22 and my subsequent appearance in court."

23 You see that you got it another way round,
24 namely Security, through Mr Pinder, approaching
25 you, then you complaining to Mr Peach and then

34

1 to page 2 to start with, we can see that this is
2 a document that you wrote on 29 January 2007.

3 **A.** Yes.

4 **Q.** So it was prepared much nearer to the events
5 we're considering?

6 **A.** Yes.

7 **Q.** We're going to look, as I say, in detail at this
8 document a little later. But I just want you,
9 if we go back to page 1, please, to look at
10 what's said in the first paragraph:

11 "In the summer of 2006 I was asked directly
12 by the Security Manager ..."

13 That's Mr Pinder, yes?

14 **A.** Yes.

15 **Q.** "... whether I would be prepared to speak to
16 a solicitor about a call I had dealt with in
17 February 2004. My initial response was that
18 this was not the normal process, but he
19 reassured me that it was more or less
20 a formality so somewhat reluctantly I agreed."

21 That is consistent with what you told us and
22 you said in your witness statement that it was
23 a direct approach to him --

24 **A.** Yes.

25 **Q.** -- rather than through Mr Peach?

36

1 A. Yes.

2 Q. You say that you said this was not the normal
3 process. What was the normal process?

4 A. I'm not sure I knew precisely what the normal
5 process was. I'm not sure if there had been any
6 previous court cases. I think I was aware that
7 some people within the Security team, perhaps in
8 particular Penny Thomas, would occasionally have
9 to go to court to give evidence.

10 Q. Just interrupting you there, if I may. Did they
11 liaise with the SSC in preparation to give
12 evidence to court?

13 A. I've got no specific memory of that happening.
14 I don't think I knew Penny very well at that
15 stage and I don't recall having actually worked
16 with her on anything.

17 Q. What about Andrew Dunks, can you remember him
18 performing the same function?

19 A. Yes, again, I mean, I knew who he was but
20 I don't think I'd had anything specifically to
21 do with him. Possibly -- and I can't remember
22 if this is before or after -- he might have
23 asked me about a particular PowerHelp call or
24 something but I don't think I'd done -- I'm sure
25 I had not done anything, except possibly answer

37

1 was to document my investigation of 26 February
2 2004."

3 A. Yes.

4 Q. You recall that you were told in the first
5 meeting that you would be a Witness of Fact --
6 capital W, capital F -- not an Expert Witness --
7 capital E, capital W. Did you then have
8 an understanding of the distinction?

9 A. Not clearly. I've got very little memory of
10 this meeting but I know -- I'd heard the phrase
11 "Expert Witness" before but I don't think I'd
12 ever heard the phrase "Witness of Fact" but it
13 was explained to me that, you know, I wasn't
14 going there to talk about the whole system. It
15 was just to say about my investigation and what
16 I had found.

17 Q. Who gave you this explanation?

18 A. I can't remember.

19 Q. Was it --

20 A. Most likely, I think the solicitor but I suppose
21 it could have been Brian Pinder or somebody, but
22 it seems more likely that it was Stephen Dilley.

23 Q. By this time, had you had any training or
24 guidance from Fujitsu or, indeed, the Post
25 Office on the differences between those two

39

1 a sort of very quick, simple question.

2 Q. Were you aware of any of those people,
3 ie Mr Dunks or Penny Thomas or similar from the
4 Security team, obtaining evidence or material
5 from the SSC, as part of the process of
6 preparing to go to court?

7 A. I don't remember that happening. I think the
8 Security team were very separate and they had
9 access to the ARQ data and the -- well, it was
10 their job to extract the ARQ data and --

11 Q. Were they experts in its interpretation?

12 A. No.

13 Q. Okay, that can come down, please. If we can go
14 back to paragraph 61 of your witness statement,
15 which is on page 19. Page 19, please.

16 At the foot of the page, paragraph 61, you
17 say:

18 "I think there was an initial meeting with
19 a solicitor, presumably Stephen Dilley, in
20 a Fujitsu office in Bracknell. Mik Peach's
21 manager, Naomi Elliott, was present at that
22 meeting or a subsequent one. It was explained
23 to me, I think in the initial meeting, that
24 I would be a Witness of Fact not an Expert
25 Witness, and the purpose of my witness statement

38

1 broad species of witness?

2 A. No training or guidance. Just this sort of
3 basic statement that I was just talking about
4 what I had done and not about the overall
5 system.

6 Q. Had you received any training or guidance from
7 Fujitsu or, indeed, the Post Office on the
8 responsibilities involved in giving evidence as
9 a Witness of Fact or as an Expert Witness?

10 A. I don't recall anybody spelling out any specific
11 responsibilities.

12 Q. Now, subsequently, we know that you carried out
13 investigations and gave some evidence about
14 matters beyond the strict confines of what you
15 had done on 26 February 2004?

16 A. Yes, I did.

17 Q. You had analysed with Mr Jenkins the contents of
18 the solicitor's letter and provided a response
19 to it?

20 A. Yes, I think at the time I saw that as being
21 a sort of separate exercise, not connected
22 really with the witness statement that I was
23 making.

24 Q. But you got more dragged into things, other than
25 the strict confines of the facts of what had

40

1 happened on 26 February?
 2 **A.** Yes, I mean, partly through my own choice
 3 because I wanted to be absolutely sure as
 4 I could be that I hadn't missed anything at all
 5 back in that original February. As we discussed
 6 yesterday, I hadn't possibly gone back as far as
 7 I could have done in January. So, in the run-up
 8 to the trial or so -- and so on, I spent a great
 9 deal of time rechecking the archived audited
 10 message store data to see if I could find any
 11 reason for the losses that I might have missed
 12 originally.
 13 **Q.** You, in the witness statement and then in court,
 14 gave a view on that; you gave your assessment?
 15 **A.** I'm not sure that my witness statement said
 16 anything about any subsequent checks that I had
 17 made and I'm not sure that that actually got
 18 picked up on in court either.
 19 **Q.** Had anyone told you about the need -- if you are
 20 conducting investigations, where you may end up
 21 giving a view or an assessment -- of the need to
 22 make a record, contemporaneous record of what it
 23 is you're doing --
 24 **A.** No.
 25 **Q.** -- and to retain the product of your

41

1 **A.** Yes. I mean, yes, we might want to talk about
 2 this some more but, yes, I felt very awkward
 3 about that.
 4 **Q.** Was there a discussion at the time about the
 5 awkwardness that you felt about being on the
 6 stand in the High Court, speaking about events
 7 in respect of which there had been no
 8 disclosure?
 9 **A.** I'm -- discussion with whom?
 10 **Q.** The solicitor, Mr Dilley?
 11 **A.** I -- I'm not sure that it was discussed. Oh,
 12 I know Stephen Dilley did subsequently send me
 13 an email, which I then passed on to various
 14 other people in Fujitsu, pointing out the
 15 disclosure rules, and so on. But I personally
 16 had no responsibility for disclosures, and so
 17 on, and hadn't -- you know, didn't know what had
 18 been disclosed or what should be.
 19 These particular event logs, we'd only found
 20 that they did still exist about a couple of
 21 weeks before the trial started, when --
 22 following up a different query that somebody had
 23 made regarding Marine Drive, and it was just
 24 because one of my colleagues in SSC went looking
 25 to see what else -- whether these files were

43

1 investigations --
 2 **A.** No, nobody ever said anything like that?
 3 **Q.** -- your working notes or the data that you'd
 4 captured?
 5 **A.** No. I mean, for the -- looking at the CAP42
 6 cash account, I know we do have that data
 7 because we have it here now -- and, obviously,
 8 I kept that and then passed it on to Gareth so
 9 he could check, and so on. But all the other
 10 checks I made, you know, I would have had a lot
 11 of various spreadsheets, and so on, at the time
 12 but nobody said I needed to retain them or say
 13 that I'd got them.
 14 **Q.** You say, subsequently, that you were put in
 15 an invidious position when you revealed in court
 16 that you had used the Tivoli event log in the
 17 course of your investigations and that hadn't
 18 been disclosed?
 19 **A.** That I'd used them in the 2006 investigations,
 20 yes. Yes.
 21 **Q.** You regarded yourself as -- we're going to look
 22 at it in the afterthoughts document in
 23 a moment -- being in a difficult spot because
 24 you were talking about something and there had
 25 been no disclosure of the underlying material?

42

1 archived, and discovered that, yes, they were.
 2 It wasn't part of the formal audit process;
 3 it was just a file archive. But yes, they
 4 existed and so, when I found that I was talking
 5 about them because of a misunderstanding --
 6 **Q.** Between you and Mr Morgan?
 7 **A.** -- between me and Mr Morgan and I was asked if
 8 they existed, of course I said "Yes, they do".
 9 **Q.** And that caused a kerfuffle?
 10 **A.** It felt like a little bit of a kerfuffle because
 11 I think everybody was ready to wind everything
 12 up and go away for Christmas --
 13 **Q.** And you had to come back in January?
 14 **A.** -- they had to come back again.
 15 **Q.** Is this a fair summary: although you spent time
 16 in 2006 looking at a wider range of data than
 17 you had looked at in 2004, you didn't keep
 18 a disclosable record of what you did in 2006,
 19 what record you used, what you were looking for
 20 and what the product of it was --
 21 **A.** Yes.
 22 **Q.** -- is that fair?
 23 **A.** I didn't keep that at the time, no.
 24 **Q.** So Mr Castleton and his legal team, if he had
 25 one, had no way of reviewing what you had done,

44

1 replicating it and finding out for themselves
 2 whether there were mistakes in your approach or
 3 your methodology?
 4 **A.** No, although I was looking really to see if
 5 I could find something that would help him,
 6 rather than the opposite.
 7 **Q.** Yes, I completely understand that.
 8 **A.** Yes.
 9 **Q.** But, in the event, the material to show your
 10 workings out was not available?
 11 **A.** That was not available, no.
 12 **Q.** Similarly, when in court you spoke about the
 13 Callendar Square bug --
 14 **A.** Yes.
 15 **Q.** -- the relevant underlying documents, for
 16 example the KELs, hadn't been provided. It was
 17 just your evidence about what had happened with
 18 the Callendar Square bug and your view that it
 19 hadn't afflicted Marine Drive that the court had
 20 to go on?
 21 **A.** Yes. I had been told quite early on in the
 22 process that KELs was something that were not
 23 disclosed.
 24 **Q.** Why were KELs not disclosed --
 25 **A.** I don't know.

45

1 **A.** Because I would have thought -- you know, in my
 2 layman's terms, I thought you had to disclose
 3 everything. But I was not a legal expert and
 4 I had no idea, you know, whether -- as I said,
 5 whether this was right or wrong and it was
 6 not -- you know, not my responsibility.
 7 **Q.** This was in the context of a case where a man
 8 was saying, "I think there are things wrong with
 9 the system, I, Mr Castleton", and these known
 10 error logs revealed problems with the system,
 11 whether they were attributable to his branch or
 12 not. That was in the context you were thinking,
 13 presumably?
 14 **A.** Um, no, it was just sort of a general -- no,
 15 "There is this information, do we not have to
 16 share it with them?"
 17 **Q.** You said that you were told to refer instead to
 18 the PowerHelp records?
 19 **A.** Yes.
 20 **Q.** The PowerHelp records are not a replica of the
 21 Known Error Logs, are they?
 22 **A.** No.
 23 **Q.** There's no equivalence between them?
 24 **A.** No.
 25 **Q.** In particular, the Known Error Log might reveal

47

1 **Q.** -- and who told you this?
 2 **A.** I can't remember if it was my manager or
 3 somebody on the Security team but I was told
 4 explicitly to talk about PowerHelp calls, rather
 5 than PEAKs and not -- and that KELs weren't
 6 disclosed nor PEAKs.
 7 **Q.** Was that because they revealed known errors,
 8 from their title?
 9 **A.** I don't know why. I was just told that was how
 10 it was.
 11 **Q.** You said one of your managers; does that mean
 12 Mr Parker or Mr Peach?
 13 **A.** At that point, it would have been -- if it was
 14 my manager, it would have been Mik Peach or,
 15 potentially, Naomi Elliott.
 16 **Q.** Is he the manager of the manager?
 17 **A.** Yeah, or potentially Brian Pinder or potentially
 18 Stephen Dilley but -- no, I don't think that was
 19 Stephen Dilley, I think it was somebody on the
 20 Fujitsu side.
 21 **Q.** So Known Error Logs just weren't disclosed and
 22 that was the way it was?
 23 **A.** That is what I was told and, although I thought
 24 it seemed strange, I didn't know it was wrong.
 25 **Q.** Why did you think it was strange?

46

1 for how long a problem was known by Fujitsu and
 2 the promptitude of steps taken to resolved it?
 3 **A.** Yes, you couldn't necessarily work out the
 4 timescale from the KEL, for various reasons, but
 5 it would give you more of a clue as to what was
 6 happening and certainly when it started.
 7 **Q.** You'd be more likely to be able to work out when
 8 the problem first emerged?
 9 **A.** It would probably give you more of a clue, yes.
 10 **Q.** There is more discussion in a KEL, is this
 11 right, more inward facing discussion by Fujitsu
 12 as to whether the error is acknowledged, than in
 13 a PowerHelp call, which is more about a customer
 14 complaining?
 15 **A.** Yes. I think when there were errors we
 16 acknowledged them, certainly on PEAKs, but
 17 PowerHelp calls, it just depends who dealt with
 18 them and who decided to put information on them.
 19 **Q.** It could be very variable the information that
 20 went onto a PowerHelp --
 21 **A.** Yes.
 22 **Q.** -- but certainly the customer complaint, the
 23 branch saying, "I've got a problem"?
 24 **A.** Yeah, yeah.
 25 **Q.** But it was hit and miss whether the

48

1 investigation and the acknowledgement of
 2 a problem got onto a PowerHelp call?
 3 **A.** To some extent. I mean, I think these calls
 4 that you have been looking at are the ones where
 5 that was most likely to happen. I would say the
 6 vast majority of PowerHelp calls, which were
 7 much more fixed issues than -- yeah, they were
 8 pretty good. But yeah, these areas where the
 9 responsibility between NBSC and --
 10 I think -- yes, if there was a known problem
 11 identified by PowerHelp, then, certainly if it
 12 had been to -- had come to PEAK, you would have
 13 had the PEAK response on there too. If it had
 14 just been handled by the Helpdesk, then they
 15 might not have spelt it out so much, if it was
 16 a system error.
 17 **Q.** So you ended up giving evidence about the
 18 Callendar Square bug --
 19 **A.** Yes.
 20 **Q.** -- without the two KELs having been disclosed
 21 that revealed that there had been an appreciable
 22 delay in addressing the Callendar Square bug?
 23 **A.** Yes, those KELs weren't disclosed.
 24 **Q.** Looking back, do you feel that the initial brief
 25 that you were going to give evidence, factual
 49

1 Mrs Chambers, can we see what you say in
 2 your witness statement about a couple of issues
 3 that concern the topic we're presently on and,
 4 therefore, if we can look at page 23 of your
 5 witness statement. At the foot of the page,
 6 paragraph 74, you say:
 7 "On 17th August 2006 I wrote to Gareth in
 8 the following terms:
 9 "I've spent some time recalculating the
 10 CAP42 cash account for Marine Drive and
 11 addressing the points in the letter from the
 12 solicitor. I hope it makes enough sense to
 13 provide you with a starting point not quite at
 14 the very beginning. Subsequent cash accounts,
 15 if needed, should be much easier now I have the
 16 mapping is set up and some idea of what numbers
 17 need to go where."
 18 Then scrolling down:
 19 "I'm now going to look at the loss made in
 20 week 42 and demonstrate that it was due to the
 21 difference between system holdings and declared
 22 holdings.
 23 "If this isn't at all what you wanted,
 24 please let me know -- I don't really know what
 25 I'm doing!

51

1 evidence, about your limited Helpdesk
 2 investigation conducted within a five-hour
 3 period on 26 February 2004 was honoured?
 4 **A.** No. Partly because Mr Castleton asked me
 5 much -- a much wider range of questions than
 6 I was expecting but it seemed only right to try
 7 to answer the questions that were put to me.
 8 But at times I realised I sounded a little
 9 unsure because it wasn't things that I had been
 10 expecting to be asked about.
 11 **MR BEER:** Thank you.
 12 Sir, that's an appropriate moment for the
 13 morning break, if it's convenient to you.
 14 **SIR WYN WILLIAMS:** Yes, certainly. So what time
 15 shall we resume?
 16 **MR BEER:** 11.30, please.
 17 **SIR WYN WILLIAMS:** Fine.
 18 **MR BEER:** Thank you.
 19 (11.15 am)
 20 (A short break)
 21 (11.30am)
 22 **MR BEER:** Good morning, sir. Can you see and hear
 23 me?
 24 **SIR WYN WILLIAMS:** Yes, I can, yes.
 25 **MR BEER:** Thank you very much.
 50

1 "This hasn't had my full attention, lots of
 2 people are on leave and Martin landed me with
 3 a tricky POLFS/FP issue. Also, yesterday I got
 4 my witness statement which is (as I expect you
 5 found) full of things I didn't say or do,
 6 including all those PowerHelp calls."
 7 Picking up on a couple of things that you
 8 said there, you say that you are looking to
 9 demonstrate that the loss was due to the
 10 difference between system holdings and declared
 11 holdings.
 12 **A.** Yes.
 13 **Q.** Would that exercise tell us if the holdings
 14 recorded by the system were inaccurate by reason
 15 of a bug, error or defect in Horizon?
 16 **A.** Sorry, I need to think about that a little bit.
 17 (Pause)
 18 The system holdings, you calculate -- well,
 19 you can see the opening figures at the start of
 20 a period and then by looking at all the
 21 transaction data that has affected the different
 22 products, and so on, you can check whether
 23 the -- what the system holding should be at the
 24 end of the next period, for example. And,
 25 obviously, if that calculation shows a mismatch

52

1 between, you know, what you calculated it should
2 be and what the system has calculated it should
3 be, then that would be a system problem.

4 But if they are the same, then, you know,
5 it's a matter of arithmetic, not opinion, and if
6 the system holding has been calculated correctly
7 and it's not the same as the declared holdings,
8 then, yes, you have a loss or a gain, which
9 would appear not to be the fault of the system.
10 **Q.** You were adding up what you could see in the two
11 records, rather than undertaking any probing
12 investigation into whether there may be
13 a problem with the recording of the transactions
14 on Horizon?

15 **A.** I was adding up the transaction data that had
16 been recorded, which was all I had to go on.
17 I mean, there were, obviously -- I'd checked for
18 things like everything netting to zero, which
19 had been okay, apart from the two things that
20 had been -- the one line identified.

21 I knew from the ARQ extract that part of
22 that checking made sure that the set of
23 messages -- there were no gaps in the messages
24 received from the branch. So everything that
25 had been written to the message store on the

53

1 obviously there was, you know, more files and
2 things to look at and, okay, it was only for
3 a shorter period, and I couldn't see anything
4 wrong with the recording of the transactions
5 subsequently.

6 It would only be by checking somehow,
7 checking against what the branch had actually
8 intended to record that you could see if there
9 was anything wrong in what had been recorded.

10 There were no gaps in the sequence but
11 whether -- certainly, it wasn't that individual
12 transactions had been dropped, if that had
13 happened, then you would have receipts and
14 payments mismatches. We didn't have those.

15 Whether entire sessions had not been
16 recorded, that I could not see. And whether
17 some of the sessions that had been recorded were
18 not as intended at the branch, I also could not
19 see that, without some way of knowing actually
20 what had happened at the branch.

21 **Q.** One way of doing that would be to send somebody
22 in on balancing day, for example --

23 **A.** Yes, or just during normal processes.

24 **Q.** -- and just watch the subpostmaster or their
25 clerk do it?

55

1 counters appeared to have been included in the
2 data that I was now doing this comparison with.

3 **Q.** This was essentially an accountancy exercise?

4 **A.** It was essentially an accountancy exercise, yes.

5 **Q.** Adding up totals --

6 **A.** Yeah.

7 **Q.** -- in different sets of data with the
8 assistance, presumably, of some Excel?

9 **A.** Yes.

10 **Q.** You say, if we scroll down, please, at
11 paragraph 76:

12 "I thought at the time, and still think,
13 that this was a job for an accountant."

14 Yes?

15 **A.** Yes.

16 **Q.** It didn't involve any computer expertise --

17 **A.** Not really, no. No. Obviously not --

18 **Q.** -- or expertise in computers?

19 **A.** Yes, that's true.

20 **Q.** So your investigation didn't extend to whether
21 there was a problem with the recording of the
22 transactions beyond the extent that you've said?

23 **A.** There was no indication of any problem with the
24 recording of the transactions that was visible
25 to me, either when I looked in 2004, when

54

1 **A.** Yeah, and try to keep a record that you could
2 check against at the end of the day. I mean,
3 the postmaster had a lot of reports that had to
4 be printed out at the end of the day, with
5 totals on for pensions and various other things,
6 and I believe that -- but this is getting into
7 business stuff, which wasn't -- I had less
8 familiarity with, but they were meant to add up
9 the dockets or counterfoils, or whatever they'd
10 got, for various things and compare them against
11 the totals on the reports, to make sure that
12 what was on the system was consistent with the
13 business that they had done.

14 But that was something that I had no way of
15 cross checking.

16 **Q.** Those are two things that could be done to seek
17 to discover whether there was an underlying
18 problem and, if so, what it was?

19 **A.** Absolutely, and it is possible that if those
20 sort of checks had been done, it might have
21 highlighted some sort of system problem. At the
22 time, my view was that seemed very unlikely,
23 but -- or, you know, completely unlikely,
24 completely impossible, but, in the light of
25 where we are now, who knows.

56

1 Q. Because there's some system faults that are not
2 visible to you, sitting in an office in
3 Bracknell?
4 A. No, not for that reason. It would be a fault
5 that we still haven't discovered.
6 Q. I see. An unknown system fault --
7 A. An unknown, unknown --
8 Q. -- that doesn't obviously leave a trace?
9 A. Yeah, that doesn't leave any trace and that
10 nobody notices happening at the time, except
11 somehow you have a loss at the end of the week.
12 Q. The two things that we've just discussed as next
13 steps, are those the kind of things that you
14 imagined the Post Office might do?
15 A. Yes, I hoped that Post Office had staff who were
16 very familiar both with the business processes
17 and had a good working knowledge of the Horizon
18 System as well.
19 Q. The passage of -- if we just scroll up, please,
20 to the middle of page 24, please, where you say:
21 "If this isn't at all what you wanted,
22 please let me know -- I don't really know what
23 I'm doing!"
24 What did you mean by "I don't really know
25 what I'm doing!"?

57

1 A. Yes.
2 Q. -- and this is an attendance note in respect of
3 it?
4 A. Yes.
5 Q. Mr Dilley records:
6 "Had a conference with Counsel, Richard
7 Morgan and Tom Beezer, Partner Bond Pearce at
8 Counsel's Chambers in London."
9 Do you remember going up to London to
10 counsel's chambers.
11 A. I remember going up to London to counsel's
12 chambers, yes.
13 Q. We can see the purpose of the conference is
14 recorded to meet four of the key witnesses to go
15 over their draft statements with them.
16 A. Yes.
17 Q. The conference note records them one by one,
18 starting with Cath Oglesby, yes?
19 A. I don't believe we were all together at the same
20 point. I think we were there separately.
21 Q. If we scroll forwards, please, to page 4 at the
22 bottom, and scroll down, please. We see at the
23 foot of this page the record concerns you:
24 "Meeting with Anne Chambers.
25 "We went through Anne's Witness Statement.

59

1 A. This was the first time I'd tried to calculate
2 a cash account by hand. We've seen from looking
3 at them they're fairly horrible, pages and pages
4 of stuff, and I was much more familiar at
5 looking at the trial balance and final balance
6 reports, which lay out the accounts, to my mind,
7 in a much more intuitive way. And then the same
8 data got reanalysed using different mappings,
9 that's saying which lines go on different cash
10 account, to produce this document, that then,
11 I believe, had to be signed off and went to Post
12 Office.
13 And I was much less familiar with how the
14 cash account processing actually allocated
15 things to particular lines.
16 So I was really having to work that out from
17 scratch, and I -- although I was -- thought
18 I was probably on the right lines, Gareth was
19 much more of an expert in this area, so I really
20 didn't want him just taking what I'd done
21 without checking it pretty thoroughly.
22 Q. Thank you. Can we move ahead, please, to
23 POL00069622. You attended a conference on
24 11 September 2006, a conference meaning
25 a meeting with lawyers and witnesses --

58

1 She said she had personally got a new set of
2 referrals for six years."
3 What does that mean? I don't really
4 understand it.
5 A. I have no idea.
6 Q. Then this:
7 "Three to four years subpostmasters had been
8 complaining that there is a problem or have
9 complained if there is a problem. Sometimes
10 there is a major [blank] for example, all the
11 cash and stock appears to have vanished out of
12 the office. But these sort of errors are
13 singular and not continual."
14 Would it be right that at this time, so
15 autumn 2006, subpostmasters have been
16 complaining for three or four years that there
17 were problems with the Horizon System?
18 A. Yes, I think that was probably true. I wouldn't
19 say that there were large numbers of these sort
20 of complaints but certainly there were some
21 concerns, I think.
22 Q. So remembering as best you can, you would have
23 said, because it would have been accurate, that
24 for three or four years subpostmasters had been
25 complaining about Horizon, rather than three or

60

1 four postmasters had reported complaints?
 2 **A.** Yes, I think that does mean that, over the --
 3 yes, three or four years, rather than three or
 4 four postmasters.
 5 **Q.** It would have been wrong to say that only three
 6 or four postmasters had made complaints about
 7 Horizon?
 8 **A.** Yes, I think so. You know, it wasn't --
 9 certainly wasn't up in the hundreds but it was
 10 probably more than three or four.
 11 **Q.** You say or it is recorded that you said:
 12 "Sometimes there is a major [then the word
 13 is missing] for example ..."
 14 Can you help us as to what that might be,
 15 looking at the context, the missing passage?
 16 **A.** A major problem, I don't know. I think one of
 17 the documents I saw very recently appears to be
 18 another bug, error or defect that I had totally
 19 forgotten about. When -- and it was probably
 20 starting up -- started happening around about
 21 the time that I was having this meeting, which
 22 was probably why it was in my mind, where --
 23 I can't remember the details but, yes, they
 24 rolled over and lost their stock.
 25 But that was -- it was so obvious that
 61

1 affecting large numbers of branches, to my
 2 knowledge.
 3 **Q.** So would it be fair to say that, in this
 4 conference, the nature and extent of the Horizon
 5 problems was not explored in any detail?
 6 **A.** I think that's true. I mean, to my view, at the
 7 time, we were talking about Marine Drive, which
 8 I was very confident had not had any of these
 9 particular problems.
 10 **Q.** Can we look, please, at your reflections
 11 document. That can come down and instead look
 12 at FUJ00152299.
 13 We looked at this earlier, do you remember,
 14 29 January 2007?
 15 **A.** Yes.
 16 **Q.** There are four headings.
 17 **A.** Yes.
 18 **Q.** "Approach to SSC staff", "Review of technical
 19 evidence", "Disclosure of evidence" and then,
 20 over the page, "Helpdesk calls".
 21 **A.** Yeah.
 22 **Q.** Did that reflect four issues that you had
 23 identified as part of this entire process of
 24 being asked to give witness evidence and then
 25 give evidence in court?
 63

1 something had gone horribly wrong, if you like,
 2 that I believe that got picked up on and
 3 investigated. It wasn't something that was
 4 affecting many branches and I think it was those
 5 that were doing "declare stock", which was not
 6 what Mr Castleton did anyway.
 7 **Q.** Was this pursued with you in any way, what you
 8 said here, that for three to four years
 9 subpostmasters had been complaining about
 10 Horizon and that sometimes there are major
 11 problems, namely cash and stock appears to have
 12 vanished out of the office?
 13 Questions about what are the problems, how
 14 many of them are there? How many subpostmasters
 15 have been affected? How are they recorded in
 16 the SSC? Can we get access to documents? Those
 17 kind of questions.
 18 **A.** I don't recall any of those kind of questions.
 19 I think I was just being asked, generally, "Are
 20 there problems with Horizon?"
 21 **Q.** And you said yes?
 22 **A.** And I gave a general answer and then I gave
 23 a specific example of something that was
 24 happening recently and also pointed out that,
 25 you know, these weren't things that were
 62

1 **A.** Yes. These were issues that I obviously felt
 2 concerned enough about to feel that, you know,
 3 having come to the end of this process,
 4 I thought, that I ought to -- I was expecting
 5 there to be some sort of investigation -- some
 6 sort of wrap-up, and I felt it was important to
 7 get these things down. I had completely
 8 forgotten, until this was disclosed to me again,
 9 that I had written this document. But yes,
 10 I obviously -- very obviously did and I am quite
 11 glad I did.
 12 **Q.** Yes. If we go back to the first page, please,
 13 the four topics, did they reflect quite
 14 significant concerns that you had, having come
 15 to the end of the process?
 16 **A.** Yes.
 17 **Q.** We've already looked at the first paragraph,
 18 "Approach to SSC staff". Can we look at the
 19 second and third paragraphs under that -- no,
 20 sorry, the second and third paragraphs under
 21 topic 1. Thank you. You say:
 22 "Subsequently, before the meeting with the
 23 solicitor, he asked me what my availability was
 24 in the autumn for the court case. This was the
 25 first time there was any mention of the
 64

1 possibility of having to go to court. Repeated
2 assurances that this would all be settled before
3 getting to court proved to be unfounded.
4 "I appreciate there may be circumstances
5 where witnesses are summoned and have no option
6 but to comply, but I was not at all happy about
7 how this was handled."

8 On that issue, were you expecting something
9 to be done as a result of your raising this
10 issue to regulate the circumstances in which SSC
11 staff were approached to provide evidence for
12 use in court proceedings?

13 **A.** Yes, I think I felt that if this was part of SSC
14 members' role, then that should be made very
15 clear to anybody wanting to join SSC.

16 **Q.** Anything beyond that, rather than just telling
17 people "By the way, when you join -- when you're
18 one of the 25 or 30 of us, you might end up in
19 court giving evidence". Did you have anything
20 further in mind about regulating how people were
21 approached, in what circumstances they were
22 approached and bringing some formality to bear?

23 **A.** Yes, I think all of that and possibly rather
24 more training and guidance than I felt I had.

25 **Q.** So that was your hope?

65

1 the accounts would have to be shown up to Post
2 Office staff who did check the figures very
3 carefully, but since the postmaster was blaming
4 the system for the losses I think it would have
5 been sensible to have double checked this with
6 Fujitsu before it got as far as court. I was
7 certainly concerned, in the early stages, that
8 there might be something I had missed."

9 Just stopping there. Were you essentially
10 suggesting by that that, before court
11 proceedings are launched, the Post Office should
12 come back to Fujitsu for a check of some kind on
13 the data?

14 **A.** It would seem very sensible, if you want to get
15 to the bottom of somebody's problems, if the
16 consequence of those problems means that they
17 may be sent to prison.

18 **Q.** So your hope was that something would be done as
19 a result of you raising this suggestion?

20 **A.** I felt it really needed to be said.

21 **Q.** You knew:

22 "Once in court, I found myself being treated
23 as an expert witness and answering a wide
24 variety of questions about the system, although
25 nominally I was a witness of fact and my witness

67

1 **A.** Yes.

2 **Q.** Can we look at your second concern, "Review of
3 technical evidence". You say:

4 "When I took the initial call in February
5 2004, I only spent a few hours on it before
6 deciding that could not see any sign of a system
7 problem. I only looked at a couple of week's
8 information."

9 That probably helps us with some of the
10 answers you were giving yesterday.

11 **A.** It does, yes.

12 **Q.** So a few hours would have been within that
13 five-hour window and to you only looked at
14 a couple, presumably meaning one or two?

15 **A.** Yes, again, I'm writing this two and a half
16 years later, so my memory of exactly what I had
17 done was no better than it was in my witness
18 statement.

19 **Q.** You say:

20 "While in this case I am now sure that I did
21 not miss anything, and my initial analysis was
22 correct, I am concerned that there was no
23 technical review of the Horizon evidence between
24 the original call and the case going to court.

25 It is probable that any system problem affecting

66

1 statement just covered the investigation done in
2 2004. Fortunately I do have extensive knowledge
3 of the system and was able to fulfil the wider
4 role -- but what would have happen if the
5 initial call had been handled by a less
6 experienced SSC person?

7 "If there is a similar case in future, where
8 the system is being blamed, would it not be
9 sensible to have a technical review of all of
10 the evidence, at the first indication that
11 a case may be going to court? Someone involved
12 in that review would then be well placed to give
13 evidence in court."

14 Again, is that the same point but put in
15 a different way?

16 **A.** Yes, I think it probably is and I would say that
17 that, I think, is the role that Gareth Jenkins
18 then picked up.

19 **Q.** You refer there to a technical review of all of
20 the evidence. What did you have in mind?

21 **A.** Anything you could lay your hands on that might
22 be relevant. That was how SSC investigated.

23 But it's -- I mean, specifically, it would --
24 the starting point would always be the message
25 store for the time, and anything else.

68

- 1 **Q.** On the point that you found yourself being
2 treated as an expert witness, we're of course
3 now aware that other Fujitsu employees attended
4 court and gave evidence against subpostmasters.
5 Were you aware of that at the time of writing
6 this memo?
- 7 **A.** At the time of writing this, I think I was only
8 aware that people in the Security team had
9 appeared in court and I'm not sure, I think
10 Gareth had perhaps expected to appear as
11 a witness before this point but, in fact, hadn't
12 done so, but he probably produced witness
13 statements. But I wasn't aware of anybody else
14 in Fujitsu --
- 15 **Q.** After this time, did you come to know that
16 Mr Jenkins was giving evidence in various trials
17 around the country?
- 18 **A.** Yes.
- 19 **Q.** Did you discuss with him this issue that you
20 raise here, namely whether you were being
21 treated as an expert witness or a witness of
22 fact and whether that was a problem or a concern
23 for him?
- 24 **A.** I don't remember discussing it explicitly with
25 him.

69

- 1 existence. I found myself in the invidious
2 position of being aware that some information
3 (Tivoli event logs) existed, but not sure
4 whether they had been disclosed or not, since
5 I had not been party to any of the requests for
6 disclosure. It became evident in court they had
7 not been disclosed.
- 8 "Quoting from an email received from [the
9 Post Office's] solicitor after my revelation
10 ..."
- 11 This was the email you referred to earlier
12 this morning?
- 13 **A.** Yes.
- 14 **Q.** This from Mr Dilley, we needn't track the email
15 down because you've cut and pasted it accurately
16 into this document:
- 17 "In any litigation, the parties involved
18 have a continuing obligation pursuant to the
19 Court rules to disclose all documents that may
20 help or hinder their case or the other side's
21 case. In this context a 'document' means
22 anything in which information of any description
23 is recorded, so it includes, just for example,
24 a computer database. Previously, I had asked
25 Fujitsu to let me have all the info it had and

71

- 1 **Q.** Do you know if this document was sent to him?
- 2 **A.** I don't know.
- 3 **Q.** Did you send it to him?
- 4 **A.** As I've said, I've got no recollection of --
5 I had forgotten that I produced this document.
6 If he wasn't on the distribution list of the
7 email, then, no, I don't think I would have sent
8 it to him. I think I felt it was something --
9 well, I think I sent it initially to my manager,
10 really, to send on to the Security team, and my
11 manager's management.
- 12 **Q.** So in the years that followed, you didn't
13 discuss with Mr Jenkins the status of the
14 evidence that he was going to give or had given
15 or his understanding of his status?
- 16 **A.** No, I don't think I ever discussed his specific
17 status. I think perhaps I assumed, because he
18 knew so much about everything, he was an expert
19 witness. But that's -- in the legal sense,
20 I wouldn't have known precisely what was meant
21 by that.
- 22 **Q.** Can we look at section 3, please, "Disclosure of
23 evidence". You say:
- 24 "Fujitsu made a major legal blunder by not
25 disclosing all the relevant evidence that was in

70

- 1 had been helpfully given HSH call logs,
2 transaction logs and events logs. I was
3 recently told that there was a message store
4 which had everything else on it and we invited
5 Mr Castleton to look at this, but he didn't take
6 up the opportunity.'
- 7 "This suggests that disclosure of the
8 message store itself was an afterthought, though
9 it is fundamental to the system. I know that
10 for fraud cases the 'transaction log' and 'event
11 log' are extracted from the full message store
12 and submitted, but surely the full message store
13 has to be disclosed in all cases?"
- 14 Just stopping there, you say, "I know that
15 for fraud cases ..." That tends to suggest that
16 you did know that there were another species of
17 case being conducted at this time?
- 18 **A.** Yes, I suppose so. I'm -- yes, I'm not sure
19 quite why I made that distinction, really, but
20 I knew that the ARQ data, which is what we're
21 talking about there, could be obtained and
22 I suppose I had assumed that was for --
23 specifically for fraud cases, but ...
- 24 **Q.** You say that transaction log and event logs are
25 exacted and submitted in fraud cases. Who did

72

1 that?

2 **A.** That's the ARQ extract that was done by the
3 Security team.

4 **Q.** When you say "and submitted", do you mean and
5 submitted to the court?

6 **A.** To Post Office, is probably what I meant.

7 **Q.** You say:

8 "... but surely the full message store has
9 to be disclosed ..."

10 Is that because, as you've earlier said,
11 it's fundamental to the system?

12 **A.** Yes, and I think until I'd seen that email from
13 Stephen Dilley, I think perhaps I hadn't
14 realised that it wasn't disclosed initially. As
15 I said, I didn't know what had been disclosed
16 and what hadn't. But I was very surprised to
17 find that that seemed to be something he'd only
18 heard about recently.

19 **Q.** So would you agree that the full message store
20 from the branch had to be disclosed in all cases
21 on which reliance on Horizon data was made by
22 the Post Office and merely disclosing standard
23 filtered ARQ data didn't meet the disclosure
24 requirement that had been described to you in
25 this email?

73

1 Some of them would -- were transient, others
2 were backed up in one way or another. Some of
3 them were possibly written to the audit servers,
4 although SSC wouldn't have seen those because we
5 didn't have access to the audit servers. So
6 I didn't know what might be there but I had
7 a feeling there might be a lot of stuff.

8 This wouldn't be specifically counter files
9 because some of the diagnostic files that were
10 written that only existed on counters, they
11 wouldn't have been maintained in this way, but
12 there could have been files containing
13 transactions for a branch, as well as for lots
14 of other branches, that were still in existence.

15 I didn't -- it was really a bit of
16 an unknown and I thought, well, perhaps somebody
17 ought to try to make sure they know it in case
18 this is relevant in future.

19 **Q.** But a known unknown?

20 **A.** Yeah.

21 **Q.** You suggested a list of files being compiled
22 because the Security team might not be aware of
23 the existence of such files and therefore their
24 relevance?

25 **A.** Yeah.

75

1 **A.** It certainly didn't seem to meet the disclosure
2 requirement that was in this email. I'd only
3 had that email well into the, you know -- this
4 was Christmas 2006. You know, I was surprised.

5 **Q.** Were the Security department, to your knowledge,
6 aware of all of the files archived to audit
7 servers that held relevant material?

8 **A.** Yes, I didn't know what they were aware of,
9 I thought -- yes, I think that paragraph there
10 sort of sums up my knowledge.

11 **Q.** That's the next paragraph?

12 **A.** Yes.

13 **Q.** "Many other files are also archived to the audit
14 servers as a matter of course and could hold
15 relevant information, although the Security team
16 are not necessarily aware of their existence or
17 potential relevance. I'd like to suggest that
18 a list of these files is compiled so that
19 similar mistakes are not made in future."

20 Starting with "Many other files are also
21 archived to audit servers", what other files are
22 you speaking of?

23 **A.** All sorts of things. You know, it's an enormous
24 computer system, so a lot of back-end files, if
25 you like, were continually being generated.

74

1 **Q.** To your knowledge, was that done?

2 **A.** I never had any follow-up on any of the things
3 in this document.

4 **Q.** You continue:

5 "And what about calls on PEAK, which may
6 have evidence attached? And any evidence which
7 might have been kept within SSC? I was not
8 asked whether I had anything that might have
9 been relevant (as it happens, in this case I did
10 not)."

11 Is that because you hadn't attached anything
12 to the PEAK?

13 **A.** Yes, I didn't attach anything to the PEAK and
14 anything that I did have in file store in 2004,
15 I would have kept it for a year, year and a half
16 but then I'd have had a tidy-up and got rid of
17 it.

18 **Q.** But your point was there needs to be a more
19 systematic approach to this --

20 **A.** Yes --

21 **Q.** -- namely people being asked to give evidence --

22 **A.** Yes.

23 **Q.** -- should be asked to turn over relevant
24 material?

25 **A.** Yes, I felt that that probably -- going on what

76

1 Stephen Dilley was saying should have been
 2 disclosed, then surely that would have included
 3 those sort of things.
 4 **Q.** You continue:
 5 "Of course there may be subtleties to this
 6 that I am unaware of, whereby data may exist but
 7 there is no obligation to disclose it. If this
 8 is the case, could any future witnesses be
 9 briefed appropriately? The response 'no one has
 10 ever asked for that before' does not seem to be
 11 a good reason for non-disclosure."
 12 Who had given the response "No one has ever
 13 asked for that before"?
 14 **A.** I cannot now remember but, since I put it there,
 15 it suggests that somebody may have said it.
 16 **Q.** Within Fujitsu?
 17 **A.** Yes, this was all aimed within Fujitsu.
 18 **Q.** Helpdesk calls the last section, section 4:
 19 "This case highlighted a common problem,
 20 both in 2004 and now. The postmaster raised
 21 many calls about his continuing losses, both
 22 with Horizon and with the NBSC. These kept
 23 being bounced and it took weeks before a call
 24 was passed to SSC."
 25 You're essentially there referring to the

77

1 **Q.** What are you getting at here? What's the
 2 underlying problem here?
 3 **A.** They were reluctant sometimes to pass calls to
 4 SSC if they thought they were just going to be
 5 told off for having passed over a call that they
 6 shouldn't have done.
 7 **Q.** So, what, they bounced it back to the NBSC?
 8 **A.** I think that did happen in some cases. It
 9 may --
 10 **Q.** So what we saw in the many documents I took you
 11 through yesterday morning was something that
 12 wasn't isolated to this case; it was a recurring
 13 problem?
 14 **A.** Yes, it was.
 15 **Q.** What we've seen is emblematic of a wider
 16 problem?
 17 **A.** I think so, yes. Certainly, the calls we looked
 18 at yesterday, I feel that there was -- there
 19 were -- there was at least one where I wished
 20 they had passed it on to SSC, possibly two, and
 21 it would have avoided some of the toing and
 22 froing. I don't believe it would have made any
 23 difference to the outcome but --
 24 **Q.** You say it leads to too many calls being closed
 25 without proper investigation or resolution. Why

79

1 evidence I took you through yesterday morning.
 2 **A.** Yes.
 3 **Q.** "Strictly speaking, problems with discrepancies
 4 do need to be investigated by NBSC in the first
 5 instance, but where there are continuing
 6 unresolved problems it should be possible to get
 7 the issue investigated properly, and one of the
 8 Helpdesks should be prepared to take
 9 responsibility for the incident. Personally
 10 I think the fact that the Horizon helpdesk is
 11 penalised for passing 'Advice and Guidance' type
 12 calls on to third line leads to too many calls
 13 being closed without proper investigation or
 14 resolution. This is very frustrating for
 15 postmasters, though possibly not an issue of
 16 concern to [the Post Office]."
 17 So, first of all, you say you think the fact
 18 that the Horizon Helpdesk is penalised from
 19 passing "Advice and Guidance" type calls to the
 20 SSC?
 21 **A.** Yes, there was some --
 22 **Q.** What was the penalty?
 23 **A.** I cannot now remember whether it was just
 24 a black mark or a financial thing. I've no idea
 25 that --

78

1 did it lead to calls being closed without proper
 2 investigation?
 3 **A.** Because the Helpdesk were just bouncing them
 4 back, without it coming to SSC, and there
 5 probably were cases where, you know, there was
 6 a system error that did need to be picked up on.
 7 And, obviously, in that case, the sooner it came
 8 to SSC, the better.
 9 **Q.** So that would just be bounced back and, if the
 10 postmaster wasn't persistent --
 11 **A.** That did happen, yes.
 12 **Q.** -- it would just we closed off?
 13 **A.** Yes. That could -- that did happen.
 14 **Q.** What would happen if there was a loss? They
 15 would just have to pay up?
 16 **A.** If they couldn't find the reason for the loss as
 17 a business issue, as I say, discrepancies were
 18 most likely not to be system problems but they
 19 could be and, certainly we'll see when we go
 20 through the rest of the bugs, errors and
 21 defects, that there were cases where it should
 22 have been reported to SSC years before it
 23 actually was.
 24 And there was this, you know -- we got calls
 25 through to SSC that probably shouldn't have been

80

1 passed through to us but there were also others
 2 that should have come to us that didn't reach
 3 us.
 4 **Q.** So all the while the system error was
 5 continuing?
 6 **A.** The one I'm thinking about yes, although --
 7 **Q.** Which one are you thinking about in particular?
 8 **A.** The one that gave 14 branches a loss every
 9 February.
 10 **Q.** That went on for a number of years?
 11 **A.** Two years.
 12 **Q.** Yes.
 13 **A.** Same branches.
 14 **Q.** You say:
 15 "This is very frustrating for
 16 postmasters ..."
 17 **A.** Yes, I think Mr Castleton would probably agree
 18 with that.
 19 **Q.** You're not basing that opinion just on
 20 Mr Castleton's case?
 21 **A.** No.
 22 **Q.** That's, at the time of writing, your six or
 23 seven years' accumulated experiences; is that
 24 right?
 25 **A.** Yeah, yeah.

81

1 **A.** I think, partly in the case of Mr Castleton,
 2 that they hadn't -- they didn't appear to have
 3 made any attempt to help him get to the bottom
 4 of the problems that he was having and that it
 5 was just seen that "Oh, well, you know, he's
 6 signed these things off, therefore that's his
 7 responsibility".
 8 When I started working on Horizon, I didn't
 9 appreciate the fact that the subpostmasters
 10 really didn't work for Post Office but they were
 11 a third party in all this. Any other systems
 12 I'd ever worked on, if there was a problem and
 13 I said, "Well, I can't see anything wrong on the
 14 system side", then the customer, if they
 15 continued to have problems, would push back
 16 quite strongly and say, "But look, this isn't
 17 right, we need to sort it", and then we would
 18 work together to sort it out.
 19 But with the case of Post Office -- and it
 20 took me quite a long time to realise how it
 21 worked -- the postmasters had -- they didn't
 22 have the power to do the pushing back and our
 23 client, Post Office, who would have had that
 24 power, did not seem interested in doing that.
 25 **Q.** How was that manifested itself, outside of

83

1 **Q.** You say it's possibly not an issue of concern to
 2 the Post Office. Why did you think the Post
 3 Office was possibly not really concerned about
 4 this?
 5 **A.** I think, by this point, I had realised that the
 6 outcome for the postmasters was not Post
 7 Office's primary consideration.
 8 **Q.** What was the Post Office's primary
 9 consideration?
 10 **A.** I think, by this point, it was fairly clear that
 11 they were keen on defending the integrity of
 12 their system rather than trying to get to the
 13 bottom of issues, whether system problems or
 14 business problems, affecting individual
 15 branches.
 16 **Q.** So it was more important, in your accumulated
 17 experience, to the Post Office to defend the
 18 integrity of Horizon, rather than conduct
 19 a proper investigation to determine whether the
 20 system is causing discrepancies?
 21 **A.** Whether the system or business practices at the
 22 Post Office are causing the discrepancies.
 23 **Q.** Can you help us: that overarching view that
 24 you've just expressed, on what information or
 25 evidence was it based?

82

1 Mr Castleton's case?
 2 **A.** I just think in other cases where I had looked,
 3 where there were discrepancies or problems, and
 4 I was not able to find any system problem and
 5 was pretty sure there was not a system problem,
 6 but I could -- you know, they were having losses
 7 or whatever, and I would say "Well, you know,
 8 perhaps your manager can help you resolve this",
 9 and the postmaster's view on that bit of advice
 10 was not usually indicative that they thought
 11 that that would be successful.
 12 **Q.** This is you expressing that contemporaneously,
 13 back in 2007, rather than now --
 14 **A.** Yeah.
 15 **Q.** -- through the sentence "possibly not an issue
 16 of concern to the Post Office"?
 17 **A.** Yeah.
 18 **Q.** In that sentence?
 19 **A.** Yeah.
 20 **Q.** Standing back, do you agree that you were, in
 21 this afterthoughts document, raising a series of
 22 fundamental and important issues about the
 23 process of giving evidence in court, in
 24 proceedings which concerned data produced by the
 25 Horizon System?

84

1 A. Yes, I mean, I was doing it really from my
2 personal point of view, having been through this
3 process. I just felt it needed to be fed back
4 as things that concerned me.

5 Q. You raised an issue about the need for a proper
6 technical review of a wide range of data before
7 proceedings were even launched, yes?

8 A. That was a suggestion.

9 Q. You raised an issue over confusion as to whether
10 a witness was giving evidence of fact or opinion
11 evidence?

12 A. Yes. Yes, I don't think anybody had ever
13 mentioned opinion evidence as an option.

14 Q. You raised an issue about witnesses being asked
15 to speak about the reliability of Horizon more
16 generally, rather than about the narrow work
17 that they had actually done?

18 A. I don't think that was particularly a concern.
19 It was just being -- it was just sort of being
20 asked not necessarily about the reliability but
21 about anything that was outside what I thought
22 I was meant to be talking about.

23 Q. These are all issues you now know, I think,
24 which have come to afflict the presentation of
25 the Post Office's cases against subpostmasters

85

1 best of your knowledge --

2 A. That's true, yes.

3 Q. -- and this was to help others, presumably --

4 A. Yes.

5 Q. -- whether those others be subpostmasters or
6 your colleagues?

7 A. Yeah.

8 Q. Can we see what was done with your report
9 please, and look at FUJ00152300. Can we see, at
10 the foot of the page, please, an email of
11 29 January 2007 -- that's the date of your
12 report, remember, 29 January 2007 --

13 A. Yeah.

14 Q. -- from Mik Peach to Brian Pinder, Security
15 Manager; is that right?

16 A. Yes.

17 Q. Naomi Elliott, that is Mr Peach's manager; is
18 that right?

19 A. That's Mr Peach's manager, yes.

20 Q. And copied to you?

21 A. Yes.

22 Q. "'Mop up' on the Castleton case", subject:
23 "Brian,
24 "I understand from Anne that you do not
25 intend to have an internal review on the

87

1 in criminal proceedings?

2 A. Yes.

3 Q. You were then, back in 2007, describing issues
4 that may have afflicted past and then current
5 criminal prosecutions, albeit you had no
6 knowledge of those?

7 A. Yes.

8 Q. Would you agree that you were raising a series
9 of red flags?

10 A. Yes, I'm not sure I thought about that at the
11 time -- thought about it like that at the time.
12 I just thought there were lessons to be learnt.

13 Q. Would you agree that it was important for both
14 Fujitsu and the Post Office to address these
15 issues and to address them properly and
16 promptly?

17 A. I was pretty clear on my point of view and, yes,
18 I hoped it might have some impact for the
19 future.

20 Q. You weren't raising them to be ignored --

21 A. No, no.

22 Q. -- nor as an insurance policy against what you
23 had done?

24 A. No, not at all.

25 Q. You weren't going to give evidence again, to the

86

1 Castleton case."

2 Stopping there, had you asked Mr Pinder
3 whether there was going to be an internal
4 review?

5 A. I have no memory of that but I assume I had
6 done.

7 Q. That tends to suggest you had --

8 A. Yes.

9 Q. -- and he'd said no?

10 A. Yeah, I assume so.

11 Q. "Nevertheless, we are concerned that POA ..."
12 That means Post Office Account?

13 A. Yes.

14 Q. Does that mean Fujitsu?

15 A. Yes, Fujitsu.

16 Q. So the Fujitsu Post Office Account:
17 "... made some errors during the course of
18 this case which could prove critical in any
19 future litigation.
20 "To this end, Anne has written up her
21 thoughts and comments (attached), and I would
22 welcome your comments."
23 Your document is an attachment.

24 A. Yes.

25 Q. If we scroll up and see what the reply was,

88

1 please. 5 February, so about a week later --

2 **A.** Yes.

3 **Q.** -- an email addressed to you and Mr Peach,
4 copied to Naomi Elliott. Then in the title
5 addressed to you, "Mik, Anne":

6 "Thanks Mik, there was no intention to have
7 a wash up on this particular case as such but
8 I must stress that from the outset this was 'new
9 ground' and a particularly unusual case (1st of
10 its kind in 10 years) for all concerned. It
11 involved many different variables which, at any
12 point in time could have culminated in a totally
13 different outcome.

14 "This enquiry took well over a year to
15 conclude and routine procedures which have
16 served us well for 10 years were suddenly being
17 stretched to new limits, but it does highlight
18 how (POA) can be called to account and I totally
19 agree we must learn from this.

20 "Anne (many thanks for your comments) you
21 have highlighted some interesting areas of
22 procedure which we need to recognise, and I will
23 custody these with Naomi and keep you both
24 informed."

25 Did you ever hear anything again?

89

1 **A.** That didn't appear to be done.

2 **MR BEER:** Thank you very much. Those are the only
3 questions I'm going to ask on the *Castleton*
4 case. Thank you.

5 **A.** Okay.

6 **MR BEER:** Sir, we're going to move now to look at
7 some of the bugs, errors and defects held over
8 from last time. I wonder whether I could
9 impertinently ask for a lunch break now, because
10 it's a useful stopping off point, and break
11 until 1.30?

12 **SIR WYN WILLIAMS:** Of course, Mr Beer. So we'll
13 resume at 1.30.

14 **MR BEER:** Thank you very much, sir.

15 (12.25 pm)

(The Short Adjournment)

17 (1.30pm)

18 **MR BEER:** Sir, good afternoon, can you see and hear
19 me?

20 **SIR WYN WILLIAMS:** I can, thank you.

21 **MR BEER:** Thank you very much.

22 Good afternoon, Mrs Chambers. Before we
23 turn to look at, in fact, just one of the bugs,
24 may we just return to a question I asked you
25 before lunch. Do you remember your

91

1 **A.** Not that I recall but, since I'd forgotten this,

2 who knows.

3 **Q.** We haven't got a record of anything else
4 happening --

5 **A.** No.

6 **Q.** -- as a result of this?

7 **A.** No.

8 **Q.** Would it be unfair to describe this as a pat on
9 the head?

10 **A.** Yes. No, sorry, not unfair. It would be fair.

11 **Q.** It's fair. "Well done, Anne, thanks"?

12 **A.** Yes.

13 **Q.** "We're just filing this"?

14 **A.** Yes.

15 **Q.** Is that how you read it?

16 **A.** Yes.

17 **Q.** Overall, your view was that something was going
18 wrong at Marine Drive, you couldn't see what the
19 problem was and the only way to progress matters
20 was at the branch?

21 **A.** Yes.

22 **Q.** That needed Post Office to take some action,
23 didn't it?

24 **A.** Yes.

25 **Q.** So far as you were aware, that wasn't done?

90

1 afterthoughts document?

2 **A.** Yes.

3 **Q.** I asked you whether you had shared that with
4 Mr Jenkins?

5 **A.** Yes.

6 **Q.** You said, unless the email trail showed that you
7 had, you couldn't recall having done so; I think
8 that's a summary of your evidence. We looked at
9 the email distribution in the email I showed you
10 right before lunch.

11 Never mind showing him the document or
12 sending him the document, do you recall, after
13 writing it, discussing any of the four issues
14 with him?

15 **A.** I certainly don't remember any formal
16 discussion. Whether we had an informal chat,
17 I have no recollection of that. I can't say
18 "yes" or "no" on that.

19 **Q.** Just breaking it down, a conversation or
20 conversations with him about the need to conduct
21 a fundamental review of data before a legal case
22 was commenced?

23 **A.** So we may -- I mean, I think he might have been
24 of the same view of that anyway, whether we
25 actually had a discussion along those lines as

92

1 to how necessary it was, I can't be certain.
 2 I do know that subsequently when he was
 3 preparing for other court cases, he did do -- he
 4 appeared to be doing a fairly thorough
 5 examination because occasionally he'd ask me to
 6 double check some of the things he was looking
 7 at as well, but I'm not sure -- I don't think
 8 this was ever formally documented anywhere.
 9 **Q.** Was that -- when he was doing what appeared to
 10 be a thorough examination -- at the stage at
 11 which he was preparing to be a witness giving
 12 evidence or was it the issue that you were
 13 concerned with, which is conducting
 14 a fundamental review of data before proceedings
 15 are even commenced?
 16 **A.** I don't think he would have been involved until
 17 proceedings were commenced.
 18 **Q.** What about the other issue that you raised in
 19 the paper concerning giving evidence of fact or
 20 opinion evidence as a witness?
 21 **A.** I don't think I ever discussed that with him.
 22 **Q.** Did you ever discuss with him the question of
 23 creating a list of available data for provision
 24 to the Security team, so they would know what
 25 was there in order that disclosure obligations

93

1 **A.** Oh, okay. Yeah.
 2 **Q.** Would you agree with the following summary of
 3 the suspense account bug: firstly, it's
 4 a Horizon Online bug?
 5 **A.** Yes.
 6 **Q.** Secondly, it involved branches that deleted
 7 a stock unit at the end of 2010 with
 8 a transaction in local suspense. They were
 9 affected as a result of that change?
 10 **A.** Yes.
 11 **Q.** Thirdly, in essence, the transaction that was in
 12 the local suspense of the deleted stock unit was
 13 left in the database used to construct branch
 14 trading statements in the same trading period in
 15 the following years?
 16 **A.** Yes.
 17 **Q.** Fourthly, this would cause a false discrepancy.
 18 It caused discrepancies in 2012 but they weren't
 19 identified as a bug at that stage?
 20 **A.** Yes.
 21 **Q.** The bug was only discovered, lastly, in February
 22 2013?
 23 **A.** Yes.
 24 **Q.** Okay. Can we look, then, and pick the story up
 25 with one of the initiating PEAKs of February

95

1 might be complied with?
 2 **A.** I've no recollection of discussing that with him
 3 and I don't think he'd have been in a position
 4 to have made that list anyway.
 5 **Q.** Who was responsible for taking forward the four
 6 issues that you had raised in your paper?
 7 **A.** I don't know. I was concerned that nobody
 8 seemed to be doing any sort of a follow-up so
 9 I sent it to my manager. So, at that level,
 10 I was really passing it on to him and, as we'd
 11 seen, he then passed it up to both his manager
 12 and the Security team manager.
 13 **Q.** Thank you.
 14 Can we turn to bugs, errors or defects. In
 15 the light of the approach that the Inquiry, the
 16 Chairman, is taking to Mr Justice Fraser's
 17 judgments and the significant quantity of
 18 material that we've now got in relation to bugs,
 19 errors and defects and the helpful explanations
 20 you've given in your first witness statement in
 21 relation to some of them, I'm just going to
 22 concentrate, if I may, on the suspense account
 23 bug.
 24 **A.** Right, which number is --
 25 **Q.** It's 3, bug 3.

94

1 2013, FUJ00081875. Can you see this is a PEAK
 2 numbered PC0223870?
 3 **A.** Yes.
 4 **Q.** The summary is:
 5 "Branch [and then a FAD code is given] has
 6 an unexplained discrepancy"?
 7 **A.** Yes.
 8 **Q.** If we just scroll down, please. We can see that
 9 it's opened on 25 February 2013?
 10 **A.** Yes, sorry, yeah.
 11 **Q.** Yes? Earlier on, you referred to a bug that it
 12 had been slow to recognise that had affected 14
 13 branches?
 14 **A.** Yes.
 15 **Q.** Is this the bug you are referring to?
 16 **A.** This is the bug that I was referring to, yes.
 17 **Q.** I think you said at the time that that was in
 18 part because of a failure at the NBSC and
 19 Helpdesk area to escalate to the SSC earlier?
 20 **A.** Yes, I can't remember now whether this --
 21 I don't think this actually got as far as the
 22 Horizon Helpdesk. I'm sorry, I can't remember
 23 now. I think there were calls at NBSC, it was
 24 discovered subsequently, when checks were made,
 25 and I can't remember if none of them were passed

96

1 on to the Horizon Helpdesk or just one but
 2 nothing got as far as SSC until 2013.
 3 **Q.** So, essentially, there's a bug in the system
 4 causing discrepancies --
 5 **A.** Yes.
 6 **Q.** -- that has been reported by a postmaster but
 7 has not been escalated to the SSC?
 8 **A.** Yes.
 9 **Q.** Therefore, the bug continues to work the
 10 discrepancies.
 11 **A.** Yes.
 12 **Q.** So the summary of the call, the branch has
 13 I think that is, an unexplained discrepancy,
 14 yes? If we then scroll down, please, further
 15 notes:
 16 "The Branch has an unexplained discrepancy.
 17 They balanced and rolled trading period on
 18 6 February, they have one stock unit, AA, and
 19 this was balanced with a loss of £39.57, which
 20 was transferred to local suspense however the
 21 figure that was cleared out from local suspense
 22 was much higher £9,839.45."
 23 **A.** Yes.
 24 **Q.** "I have carried out transaction logs for all
 25 transactions from date range 31 January to
 97

1 **A.** Yes, it appears so. The contact was Ibrahim at
 2 NBSC, and he had probably sent this to HSH,
 3 whatever they were called then, quite possibly
 4 as an email or something.
 5 **Q.** So it's been cut into the PEAK?
 6 **A.** It's been put into a new PowerHelp call, or
 7 whatever calls were called at that point, which
 8 has then be routed to PEAK and has created
 9 a PEAK in the process.
 10 **Q.** Got it. Then if we scroll down, please. There
 11 is some process chat, yes?
 12 **A.** Yeah.
 13 **Q.** You changed the summary --
 14 **A.** Yeah.
 15 **Q.** -- from "Branch has an unexplained discrepancy"
 16 for putting the branch code having
 17 an unexplained discrepancy?
 18 **A.** That was standard practice. We always tried to
 19 put the branch code in the heading of the call.
 20 **Q.** Is that for subsequent searching purposes?
 21 **A.** It would have been picked up for searching
 22 wherever it was but just so -- it just made it
 23 clearer and then, if you were looking at the
 24 stack, you might possibly see if you've got
 25 several --
 99

1 6 February. Branch has submitted copies of the
 2 final balance reports from [Trading Period]
 3 10BP4 ..."
 4 What does that mean?
 5 **A.** Yes, by this time instead of having weekly cash
 6 account periods we had four-week trading periods
 7 and they could be split into weekly balance
 8 periods if postmasters wanted to balance things
 9 weekly.
 10 **Q.** So this is balancing period 4 of the trading
 11 period 10 --
 12 **A.** Yeah.
 13 **Q.** -- and balance period 5 of trading period 10;
 14 yes?
 15 **A.** Yes.
 16 **Q.** "The balance report for TP10 BP5 shows
 17 discrepancy transferred of £39.57 and then
 18 discrepancy resolved of £9,839.45. The
 19 transaction log completed for all transactions
 20 does not show any other figures being entered
 21 into or removed from the housekeeping/local
 22 suspense account."
 23 **A.** Yes.
 24 **Q.** So this text here, is this taken from the NBSC?
 25 Is this an NBSC person writing it?
 98

1 **Q.** So then the call having been assigned to you at
 2 5.02, 45 minutes later you make the change and
 3 then, the following day, you make your first
 4 substantive entry; is that right?
 5 **A.** Yes.
 6 **Q.** If we scroll down so we can read the whole of
 7 that:
 8 "When they completed the balance on the
 9 6 February and cleared the loss from local
 10 suspense, the amount cleared was £9,000-odd,
 11 instead of the loss they put into local suspense
 12 which was £39-odd. This appears to be
 13 a consequence of something that happened during
 14 the previous trading period rollover on
 15 2 January: a 'gain to local suspense' of
 16 £9,000-odd was included in the DEF opening
 17 figures."
 18 What are the "DEF opening figures"?
 19 **A.** "DEF" was a default stock unit, I can't now
 20 fully remember its purpose but every branch, by
 21 this point, had one of those.
 22 **Q.** "I don't think any of the local suspense
 23 products should ever appear in the opening
 24 figures."
 25 Can you explain what you mean there, please?
 100

1 **A.** Because when you rolled over into a new trading
 2 period, before you did that, you had to clear
 3 local suspense, ie make good any loss or gain
 4 that had been made during that period or clear
 5 it in some other way, and so local suspense
 6 should always be zero at the point that you roll
 7 over, so there should never be any value for it
 8 in the opening figures for the next period.

9 **Q.** You continue:
 10 "However I found 14 such lines, all product
 11 6295 gain to LS."
 12 What does that mean.

13 **A.** Gain to local suspense.

14 **Q.** What does "product 6295" mean?

15 **A.** Every product had a number as well as a name and
 16 the number for gain to local suspense was 6295.

17 **Q.** "Unfortunately all created November to December
 18 last year so there is almost no remaining
 19 counter evidence."
 20 What did you mean by that?

21 **A.** Because these records had been created some
 22 three months -- two/three months previously,
 23 looking at log files on the counter, and so on,
 24 was unlikely to help.

25 **Q.** How did you find the 14 other examples --
 101

1 something. He must have been the duty manager
 2 on this occasion and I probably discussed it
 3 with him and said, "This looks serious".

4 **Q.** You then include -- I think that's essentially
 5 a hyperlink, I would call it, to BRSS Extracts.
 6 What are BRSS Extracts?

7 **A.** The BRSS was a copy of the branch database,
 8 which in fact was what we ran our support jobs
 9 on, so we weren't impacting the live database.

10 **Q.** You were doing that presumably so you've got
 11 a document to work from easily obtainable, the
 12 reason --

13 **A.** So this --

14 **Q.** -- you created the hyperlink?

15 **A.** Yes, this was evidence that I'd added. It was
 16 probably an Excel spreadsheet.

17 **Q.** You say:
 18 "We only keep opening figures for three old
 19 trading periods so can't be sure when the
 20 problem started."
 21 Does that mean that the opening figures for
 22 three four-week periods were that which was
 23 retained.

24 **A.** Yes, I believe so because old data was
 25 continually having to be deleted out of the
 103

1 **A.** Um --

2 **Q.** -- or instances?

3 **A.** By this point, we're not dealing with Riposte
 4 and message stores, and so on.

5 **Q.** No.

6 **A.** We're dealing with an Oracle database system
 7 that was all held centrally, something called
 8 the Branch Database. It should really have been
 9 the Branches' Database because it contained --
 10 there were a lot of different tables containing
 11 data for all the branches, obviously each record
 12 said which branch it referred to, and so on.
 13 So once I'd found the table of interest,
 14 I could just do a query on that table to find
 15 all records for that product in that table,
 16 regardless of branch.

17 **Q.** You're continuing to investigate the cause and
 18 implications?

19 **A.** Yes.

20 **Q.** Mr McEwan changes the call priority?

21 **A.** Yes.

22 **Q.** Is that increasing its priority?

23 **A.** That's increasing the priority. He was -- the
 24 team leaders within SSC took it in turns to be
 25 sort of duty manager for a day or a week or
 102

1 tables.

2 **Q.** Continuing later that day, if we scroll down,
 3 please, you ask Ibrahim at the NBSC if the
 4 suspense report from 2 January is available.
 5 He'll obtain it and email it to HSD, IMD -- is
 6 that the Incident Management Team.

7 **A.** Yes, I believe so.

8 **Q.** What did you want that for?

9 **A.** I thought it would be interesting to see what
 10 entries were on the suspense report. This was
 11 a report that would have been produced at the
 12 branch on 2 January.

13 **Q.** You got that by 4.51. You looked at it and it
 14 didn't show an anomaly; is that right?

15 **A.** I couldn't see anything on it, yeah.

16 **Q.** Scroll down, please. You say you have asked,
 17 top of the page "what the branch did about the
 18 problem last year". Who were you asking there?

19 **A.** I can't remember whether I asked Ibrahim or
 20 whether, by this time, I was talking direct to
 21 the branch. I think it's more likely I asked
 22 Ibrahim.

23 **Q.** By 4.20, you say you found the cause of the
 24 problem.

25 **A.** Yes.
 104

1 Q. "... some data from autumn 2010 has been
 2 retained in [a table] for 14 separate branches.
 3 These branches will all have been affected by
 4 this problem late 2011 and late 2012, though in
 5 some cases the amounts involved are small."
 6 Do you then set out the 14 affected
 7 branches?
 8 A. Yes, I do.
 9 Q. You wanted, however, to see what needed still to
 10 be ascertained and you, I think, then set out
 11 a series of questions and answers to yourself?
 12 A. Yes, I mean, any investigation you've got
 13 various things that then need to be done and
 14 this was trying to record what needed to be
 15 done.
 16 Q. Do we see those at the foot of the page and
 17 continuing?
 18 A. Yes.
 19 Q. So under "Still to be investigated"?
 20 A. Yes, as far as I can see.
 21 Q. Thank you:
 22 "Exactly how did these records cause the
 23 observed effect?
 24 "Why were these records not removed by the
 25 normal archiving process?"

105

1 that right?
 2 A. Yes.
 3 Q. So we're now on the 28th:
 4 "Exactly how did these records cause the
 5 observed effect?"
 6 Then you describe essentially the problem
 7 that I outlined at the beginning, yes?
 8 A. Yes.
 9 Q. "How to identify the problem from branch
 10 reports?
 11 "Branch trading statement: the sum of two
 12 Discrepancy Transferred lines does not match the
 13 total of the two Discrepancy Resolved lines."
 14 A. Yes.
 15 Q. Can you explain how that identifies the problem
 16 from branch reports?
 17 A. Well, the branch trading statements, which -- it
 18 was the cash account replacement, that would
 19 show the discrepancies being put into local
 20 suspense from all the different stock units and
 21 then, before they could roll over into the next
 22 trading period, the final -- when they rolled
 23 over the final stock unit, then they had to
 24 clear that amount that was in local suspense.
 25 This particular problem that -- the whole

107

1 "What impact has the problem that on the
 2 branch accounts?
 3 "What impact has the problem had on POLSAP?
 4 "How do we remove the records to prevent
 5 future problems?
 6 "Were there any affect branches which have
 7 since closed?
 8 "There are 19 other branches which have had
 9 old data in the affected table, but not relating
 10 to Local Suspense. Could this cause any problem
 11 with the branch accounts?"
 12 What did you mean by that last entry,
 13 please?
 14 A. When I looked in the table that I had
 15 identified, that had these 14 local suspense
 16 lines in, I found that there was other old data.
 17 I, presumably at this point, just looked for any
 18 records older than a number of months because
 19 they should have been removed by the archiving
 20 process. I found that there was some other data
 21 in there but, as I say, not relating to local
 22 suspense, so I was -- obviously that was
 23 something else that needed to be followed up.
 24 Q. The next day, I think you repeat your questions
 25 and then give some of the answers to them; is

106

1 problem was because they were having to clear
 2 more than they had put into local suspense, so
 3 those numbers would not match up on the branch
 4 trading statement.
 5 Q. Thank you. Then if we scroll down, please, to
 6 16.05.10, on 6 March. Thank you. You record
 7 that:
 8 "There was a conference call with [the Post
 9 Office] (Laura Darby, Mark Wardle and others) on
 10 28 February about this call, and the spreadsheet
 11 showing the impact of the problem on the 14
 12 branches were sent to them by Steve Bansal. We
 13 are waiting to hear from Mark whether this is
 14 sufficient information for them to resolve the
 15 consequences on the branches and POLSAP."
 16 A. Yes.
 17 Q. What were the consequences on the branches?
 18 A. They had had to clear a loss or a gain, which
 19 had been -- was not the amount that they should
 20 have had to clear.
 21 Q. You say:
 22 "We will then need to get the old data
 23 causing the problem removed from the database
 24 ..."
 25 A. Yes.

108

1 Q. "... and consider whether extra checks should be
2 put in place to trap similar anomalies in the
3 future."

4 A. Yes.

5 Q. Were extra checks put in place to trap similar
6 anomalies in the future?

7 A. Yes, they were, eventually.

8 Q. When were they put in place?

9 A. I think it may be at the bottom of -- it's at
10 the bottom of one of the PEAKs. It wasn't for
11 several months, I think.

12 Q. What was the check put in place?

13 A. I believe there were two checks. One was as
14 I've already outlined and then there was
15 a second one, which I can't remember without --
16 I'm sure I've written it down somewhere or it's
17 in the -- it's certainly in one of the PEAKs.
18 But this was -- you know, we knew we had
19 followed up these specific ones but it was just
20 in case such a thing -- situation should ever
21 occur in future.

22 There was no reason to think it would but,
23 if it did, then people would be alerted to it
24 rather than the postmaster having to raise
25 a call.

109

1 Q. You say "in case there are questions to be
2 answered about any of the affected branches'
3 accounts", was that in recognition that changes
4 to data that were being made like this might
5 lead to disputes between the Post Office and
6 subpostmasters, if there wasn't a clear and
7 defensible audit trail?

8 A. I don't think it was specifically that, it was
9 just obviously that there had been an error
10 caused at these branches and it just seemed
11 like -- we weren't deleting transaction data
12 here, this -- yes, they are financial records
13 but they shouldn't have been there but I just
14 felt we shouldn't just get rid of them without
15 making a note.

16 Q. You say "in case there are questions to be
17 answered"; questions to be asked by who?

18 A. Anybody.

19 Q. Including subpostmasters?

20 A. Yes, potentially, yes.

21 Q. So there did need to be a clear and defensible
22 audit trail of what had been removed in case
23 a subpostmaster asked about it?

24 A. Yes, I think so.

25 Q. Were subpostmasters told about the changes to

111

1 Q. Can we look, please, at POL00028744. Thank you.

2 This is, I think, a linked PEAK.

3 A. Yes, it's a clone of the one that we were
4 looking at previously.

5 Q. If we go forwards, I think, to 13 March,
6 please -- if we keep scrolling, please -- you
7 make an entry on this copy of the cloned PEAK:

8 "We need to make sure a copy of the records
9 being removed is kept somewhere in case there
10 are questions to be answered about any of the
11 affected branches' accounts."

12 Yes?

13 A. Yes.

14 Q. Firstly, the records being removed. What
15 records were being removed?

16 A. These were the records in this table,
17 BRDB_RX_BTS_DATA that had been created in
18 2010/2011 --

19 Q. 2010.

20 A. -- which should have been removed by the
21 automatic archiving process but had not been
22 removed.

23 Q. You wanted a copy of that which was removed
24 retained?

25 A. It seemed like a good idea.

110

1 the data made by Fujitsu?

2 A. I can't remember now. I think Post Office dealt
3 with talking to the affected branches. As
4 I say, this was not changing transaction data.

5 Q. It was changing data that had financial
6 consequences for the subpostmasters?

7 A. In that it was data that shouldn't have been
8 there and so we were removing it.

9 Q. It was causing them to show a discrepancy that
10 was false?

11 A. Yes. Because these records, which should have
12 been removed, were still there. So we needed
13 a copy, so we could say, look -- if necessary we
14 could say "Yes, it was this record for your
15 branch and it caused a false discrepancy of this
16 amount". And we'd already got that information
17 into spreadsheets, and so on. I just felt it
18 was something that should be done.

19 Q. Do you recall whether the Post Office briefed
20 subpostmasters on the issue that had afflicted
21 their data, the steps taken to make corrections
22 and identifying what had occurred, so that any
23 further problems might be more easily spotted by
24 them when the known issue was impacting them?

25 A. I can't remember the details. I know we had

112

1 a couple of conference calls with Post Office
2 and I know Gareth wrote a note to attempt to
3 describe the problem, and there were discussions
4 between Gareth and Post Office as to what should
5 be done but, at this precise moment, I know
6 we've got documents about this, but I can't
7 remember the details.

8 **Q.** I'll try and help you. If we can look, please,
9 at POL00098189. If we start at page 4, please.
10 We can see from the foot of the page, this is
11 an email signed off by you.

12 **A.** Yes.

13 **Q.** Yes?

14 **A.** Yes.

15 **Q.** Then if we just go up to the bottom of page 3,
16 we can see it's an email sent by you to Andrew
17 Winn, Helen Love and the duty manager?

18 **A.** Yes.

19 **Q.** Who was Andrew Winn?

20 **A.** A Post Office person.

21 **Q.** Was it usual for you to communicate directly to
22 the Post Office in this way?

23 **A.** Not unless there'd been some previous conference
24 call or request. I wasn't sending -- as it
25 says, "as requested", and I believe this was

113

1 **Q.** Then you say:

2 "I've made a few possible changes to both
3 letters which hopefully make the cause and scope
4 of the problem clearer.

5 "I tried to phone you, because Gareth
6 Jenkins mentioned that this problem is still
7 being discussed at a high level as part of the
8 ongoing investigations/checks into Horizon, and
9 I would hate anything I have put here to
10 compromise that -- I don't see why it should but
11 just wanted to flag it. I assume anything going
12 out to the branches will be reviewed in the
13 light of that."

14 **A.** Yes.

15 **Q.** So, essentially, he, Mr Winn, was asking you to
16 check his communication out to branches, his
17 draft communication out to branches for
18 accuracy; is that right?

19 **A.** For technical accuracy, yes.

20 **Q.** Yes, and was that usual practice for the Post
21 Office, to ask Fujitsu for advice on how it
22 should communicate with subpostmasters about
23 a problem arising in Horizon and impacting on
24 their Post Office business?

25 **A.** I don't recall it ever happening any other time

115

1 following one of the conference calls where

2 I had tried to explain this incredibly
3 complicated set of events which had led to this
4 problem, and I think everybody felt it would be
5 clearer if I tried to write it down.

6 **Q.** Thank you. If we scroll up, please. We can see
7 Mr Winn's reply.

8 "Hi Anne,

9 "Thanks for this. I've taken a deep breath
10 and tried to confirm the actual impact on
11 branches and prepare our communications to them.
12 Can you have a look at my first draft to see if
13 I have simplified and condensed what happened
14 without losing meaning or any key detail?
15 Appreciate you will not be comment on what the
16 branch or the FSC has subsequently done."

17 Some stuff about the Crown branches and then
18 an individual branch:

19 "Any thoughts?

20 "Andy."

21 Then scroll up, please. Keep going so we
22 can see all of your email. You deal with the
23 spreadsheet for Willen, which I think is one of
24 the Crown branches, and Lower Regent Street.

25 **A.** Yes.

114

1 and I wouldn't say they're asking me how to

2 communicate. It was just trying to make sure
3 that any technical information in those letters
4 was as accurate as possible because, obviously,
5 you know, they'd be trying to make it clear to
6 the postmasters.

7 **Q.** In your first witness statement, you'd said
8 that, generally, when Fujitsu identified
9 a problem and communicated it to the Post
10 Office, it was for the Post Office to determine
11 if, how and when the problem should be
12 communicated to subpostmasters; is that right?

13 **A.** Yes.

14 **Q.** So is this something of an exception, ie you
15 involving -- or you being involved?

16 **A.** Yes, I think Post Office had made the decision
17 as to what they wanted to do and were then
18 looking to work out how to explain it clearly to
19 the postmasters, and it was just the technical
20 description of the problem as it appeared to the
21 postmasters. They presumably just wanted to try
22 to make sure that was accurate. But I am not
23 sure I should have been doing that and I was
24 obviously a little concerned that I was doing
25 it, but I was trying to be helpful.

116

1 Q. In the paragraph beginning "Tried to phone you",
2 you refer to the problem being discussed at
3 a high level.

4 A. Yes.

5 Q. Can you recall what the high level discussion
6 was about?

7 A. Presumably that there was a bug in Horizon.

8 Q. Yes, but why might a discussion at a high level
9 be compromised by what you had written or
10 approved to be written?

11 A. I don't know, but I think I was aware that I'm
12 not always very sort of politically sensitive,
13 and I was not wanting to get it wrong.

14 Q. So you didn't want to tread on toes; is that
15 right?

16 A. Yeah.

17 Q. So did you think you might be compromising the
18 position of Fujitsu in some way?

19 A. No, I don't think so. I just wanted to caveat
20 the fact that I was doing things and I didn't
21 want it just going out because I and Andy Winn
22 had said so.

23 Q. If we scroll up, please, to see Mr Winn's reply.
24 The first three paragraphs don't really matter
25 to us but then he says to you:

117

1 coming back to me to try to, you know,
2 understand exactly which combination of rather
3 a lot of different things had caused these
4 branches to be impacted.

5 MR BEER: Thank you very much. They're the only
6 questions that I ask you about this bug and
7 they're the end of my questions. Thank you very
8 much, Mrs Chambers.

9 Sir, I think there are questions from one
10 Core Participant, the Hodge Jones & Allen team.

11 SIR WYN WILLIAMS: Yes.

12 MR BEER: Thank you.

13 **Questioned by MS PAGE**

14 MS PAGE: Thank you, sir.

15 Mrs Chambers, as you know I think, I appear
16 for number of subpostmasters including
17 Mr Castleton, who sits to my right.

18 A. Yes.

19 Q. Earlier on in your evidence, you were looking at
20 the ARQ data for week 41, which shows a zero
21 stamp declaration --

22 A. Yes.

23 Q. -- and you explained that the stamp declaration
24 was one part of what went into the total stamps
25 carried forward into week 42 --

119

1 "I intend this to go through our solicitors
2 before it gets sent out.

3 "Have a good weekend."

4 So, presumably, at this stage, the issue was
5 being treated with sufficient seriousness by the
6 Post Office, that its communications out to its
7 subpostmasters were being vetted or approved or
8 at least looked at by their solicitors.

9 A. That's what that says.

10 Q. Yes. Was that usual?

11 A. I don't know. As I said, I was -- I don't
12 recall ever having been involved at this
13 particular level before.

14 Q. So this, from your perspective, is a bit of
15 an outlier, this type of thing that you were now
16 engaged in --

17 A. Oh, yes. Yeah.

18 Q. -- ie communications between you and Mr Winn at
19 a working level, those higher up the chain
20 discussing at a management level perhaps
21 responsibility for the bug, and solicitors
22 checking communications to subpostmasters?

23 A. Yes, this was very unusual and my input was
24 really because it was such a complicated problem
25 to explain that, you know, people were still

118

1 A. Yes.

2 Q. -- and, in effect, it was the stamps bearing
3 denominations which come in large books, those
4 sort of stamps that say 1 penny --

5 A. (*The witness nodded*)

6 Q. -- or they might say 10 pence, or whatever?

7 A. Yes, yes.

8 Q. Obviously that's the staple of any Post Office,
9 selling that sort of stamp?

10 A. Yeah.

11 Q. So we can probably agree that a subpostmaster
12 wouldn't accurately declare that to be zero.
13 You'd never get to the end of your stamps, would
14 you?

15 A. No, no.

16 Q. We can go to it, if you like, but you may be
17 able to take it from me that, in week 41, the
18 final balance, which has the breakdown of the
19 two parts, shows a figure for both parts?

20 A. Yes.

21 Q. So there isn't a zero.

22 A. Yes.

23 Q. There's stamps and there's the stock stamps, if
24 you like --

25 A. Yes.

120

1 Q. -- the other stamps. That zero declaration that
2 we see before the cash account was finalised,
3 that appears to be an anomaly; is that fair?

4 A. It appears to be an anomaly, yes. But I do have
5 a probable explanation for it but not one that
6 I can prove.

7 Q. Well, I suspect that we probably don't need
8 probable explanations, if there's one that you
9 can prove then we could hear it, but --

10 A. I don't have -- I mean, I do not now have any
11 evidence that I've seen that means that I can
12 prove it, but if I could explain what the
13 probable one is? Because we know that the
14 earlier declaration for £1,183 was included in
15 the accounts, so that zero declaration appears
16 to have had no effect because you would have
17 expected that to have wiped out that other
18 amount.

19 But when you made a stamp declaration or
20 a cash declaration, you could give a specific
21 drawer ID. I think we've seen that somewhere.
22 So, normally, Mr Castleton used drawer 11. Now
23 it is conceivable, but this is what I can't
24 prove, that this zero declaration had
25 a different drawer ID, which is why it didn't

121

1 the paragraph -- I'm so sorry, it's actually at
2 the end of paragraph 18, having dealt with it,
3 you say:

4 "In my view it is extremely unlikely
5 (bordering [on] impossible) that any
6 transactions were lost as a result of the
7 counter replacement."

8 Then you give your explanation of that:

9 "There is no indication of any problem with
10 the physical connection. Even if there were,
11 they could only impact CAP45 and not cause
12 losses in consequent periods."

13 So you've asked and answered your own
14 question: could the loss of node 2 or the
15 failure of node 2 have lost transactions? You
16 asked that question and then you answer it in
17 the negative, yes?

18 A. Err, yes --

19 Q. Or at least bordering on the impossible, you
20 say, extremely unlikely?

21 A. Yes, and then I carry on discussing it in
22 paragraph 19 as well.

23 Q. You do indeed. If we go down to paragraph 21,
24 you make a general observation:

25 "... counter replacement, though it could

123

1 overwrite the earlier one. But that, to me,
2 seems likely, because, otherwise, if it had been
3 the same drawer ID, it would have overwritten
4 the earlier one.

5 If I'd got the full message store that was
6 audited then that's something I could have
7 checked and I may well have checked it back in
8 2006 but I can't check it now, I'm afraid.

9 Q. No. All right. Well, we might come back to the
10 full extract from the message store in a little
11 while. On 2 February 2004, the second terminal
12 in Marine Drive, node 2, was the one that
13 failed, yes --

14 A. Yes.

15 Q. -- and that was at around 14.20 -- sorry, it
16 came back into action around 14.20 on
17 2 February, having failed, yes?

18 A. Yes.

19 Q. If we could look at your witness statement,
20 please. If you need the reference it's
21 WITN00170200. If we go, please, to page 5, and
22 we go down to paragraph 17, please.

23 You deal with this issue of node 2 failing
24 and, in paragraph 17, having sort of dealt with
25 it and, if we go over the page, at the end of

122

1 potentially result in transactions being lost if
2 the broken counter had been operational but
3 disconnected prior to replacement, would not be
4 a cause of losses occurring two or three weeks
5 later."

6 So you do acknowledge there that the
7 possibility of losing transactions is present
8 when there's a failure of a hard disk or a node.

9 A. There's a possibility, yes.

10 Q. That's something that you knew was not just
11 a possibility but sometimes happened it; is that
12 right?

13 A. Yes, it did happen but -- yes, it did happen but
14 only if you had other problems, comms problems,
15 as well as the counter replacement.

16 Q. Well, there's one example, isn't there, in --
17 I can take you to the document to help us deal
18 with this. It's POL00000994. This appears to
19 have been a reasonably significant loss of data.
20 We can see there at the top "Recovery of
21 overwritten transactions", and we get the code
22 for the branch where this happened.

23 A. Yes.

24 Q. If we go down a little bit and we look under
25 "Extra detail", we can see a bit of

124

1 an explanation of what happened.

2 **A.** Yes.

3 **Q.** "Due to problems with the gateway, which has
4 been replaced twice, and communications ..."
5 So that confirms what you were saying: that
6 it's often when there's a communications issue
7 as well, yes?

8 **A.** And, in this case, it was communications both
9 between the gateway and the data centre and
10 between the gateway and the other counters, so
11 it was two different sets of communications.

12 **Q.** But what we do see though is that approximately
13 900 transactions -- this is the second
14 paragraph -- done on the gateway between 1300 on
15 the 9th and 11.46 on the 12th were effectively
16 no longer present; is that fair?

17 **A.** Yes, they were no longer in the branch message
18 store.

19 **Q.** Right, and:
20 "To get the messages back, we will [need to]
21 delete the counter message stores and let the
22 version from the correspondence server replicate
23 down."
24 Yes?

25 **A.** Yes.

125

1 available to me in the run-up to the -- this
2 appearance.

3 **Q.** Am I right in saying there was an overnight
4 process checking across the whole Post Office
5 estate for hardware failures, "bad blocks", as
6 I think it was termed?

7 **A.** I think there was something like that. I can't
8 remember details.

9 **Q.** Do you know when that was introduced or why?

10 **A.** No, I don't know. That wasn't something that
11 SSC were responsible for.

12 **Q.** No, all right. There was a sort of an issue, if
13 you like, around recovery after hardware
14 failures, and the need to make sure that any
15 transactions that had been affected by hardware
16 failures needed to be checked over, if you like,
17 and made sure that they were present?

18 **A.** Yes, I mean, recovery in the counter sense is --
19 would really just be any transactions that were
20 on the stack at the point of failure that didn't
21 get settled/written to message store.

22 **Q.** If we look at how that's handled in the Horizon
23 user guide, we can see that in POL00071234.
24 Page 29 is where a longish section begins,
25 headed "Equipment failure checklist (dealing

127

1 **Q.** Then it goes on to say at the end:
2 "We will reinsert the transactions which
3 were completed in that time, and reset the stock
4 unit ..."
5 Yes?

6 **A.** We reinserted the messages written on 7 and
7 8 September, yes.

8 **Q.** So this is an example of messages being lost
9 following hardware failure?

10 **A.** Yes.

11 **Q.** All right, well, we can take that down.
12 Is it because of that sort of issue that you
13 thought to yourself, when making your statement,
14 "Well, I see that there was a hardware
15 replacement at Marine Drive, I'd better sort of
16 cover that off, if you like?"

17 **A.** It was knowing that Mr Castleton had asked
18 questions in this area in court in 2006, which
19 I felt I perhaps hadn't answered as clearly as
20 I should have done at the time, partly because
21 I wasn't expecting to be asked about it. So
22 I felt it was worth trying to spell out in my
23 statement here my view of the situation, based
24 on what I could remember from them and also
25 examining bits of evidence that have been made

126

1 with equipment failure)", and then we see at the
2 top of the page it says, "System failure". That
3 section 12 is reasonably substantial. Do you
4 recognise this?

5 **A.** I had that -- I had access to the Horizon System
6 User Guide. I cannot remember whether I ever
7 read this particular section.

8 **Q.** If we go down to page 40, "Identifying lost
9 transactions following a system failure", this
10 is the section, still, as you see, headed
11 "System failure", so we're still dealing with
12 system failure as the overarching subject, and
13 identifying lost transactions.
14 Then if we scroll down, we can see that
15 a very substantial flowchart is presented,
16 "Recovery procedures after system failure". We
17 can see this flowchart. If we keep scrolling
18 down, it does rather go on and on. If we just
19 carry on, you'll see what I mean. You see how
20 a subpostmaster was supposed to go about dealing
21 with matters of recovery after a hardware
22 failure.
23 We can effect take that down, I don't
24 propose to take you to the detail, but let's
25 suppose that, for whatever reason,

128

1 a subpostmaster was not able to work through
 2 that flowchart perfectly, presumably that may
 3 result in lost or missing transactions?
 4 **A.** Without spending a lot of time going through
 5 that flowchart, which I'm sorry but I haven't
 6 ever examined in any detail, I don't think I'm
 7 going to be able to answer that. Basically, if
 8 there was a set of transactions on the stack and
 9 the counter fails at that point, without
 10 settling them, then they will be thrown away but
 11 there are certain extra things that needed to be
 12 done, particularly for if it -- there were any
 13 bill payments in that set of transactions.
 14 **Q.** Which might pick it up in reconciliation; is
 15 that right?
 16 **A.** That might be picked up in reconciliation.
 17 Without seeing a particular example, it's hard
 18 to know. Banking transactions would have been
 19 sort of picked up if necessary through
 20 reconciliation and there was something at the
 21 end there about if what was on the stack was
 22 a rem in or rem out, that might have an effect.
 23 But I have to say I don't see the relevance of
 24 that to the failure overnight on a Saturday
 25 night at Marine Drive.

129

1 counter or to a replacement one. But if it
 2 fails in the middle of the night, after you've
 3 finished your trading, you're not using it,
 4 there can't be any incomplete transactions,
 5 recovery is not an issue.
 6 **Q.** Can I just ask a question of Mr Castleton?
 7 **A.** Yes, certainly. *(Pause)*
 8 **Q.** Where there's a screen freeze or a failure
 9 mid-transaction, then that's something that the
 10 subpostmaster would need to go through, yes? If
 11 that didn't work -- and this is not necessarily
 12 talking about the overnight failure that we were
 13 talking about before -- but if that didn't work,
 14 there's the potential for the subpostmaster to
 15 fail to be able to get back their incomplete
 16 transactions, yes?
 17 **A.** Yes, if you've got a screen freeze in the middle
 18 of the day while you're serving then, yes,
 19 anything that was on the stack but not settled,
 20 which should just be transactions for a single
 21 customer, then they will not exist.
 22 **Q.** So if they had failed to get through that rather
 23 lengthy flowchart and not been able to
 24 successfully bring the transactions back through
 25 doing that, would that be deemed user error?

131

1 **Q.** Well, that was directing subpostmasters to
 2 a process that they were supposed to complete if
 3 there'd been a system failure -- I mean,
 4 a hardware failure. So, presumably, that was
 5 what any subpostmaster presented with a hardware
 6 failure was supposed to go through?
 7 **A.** But wasn't the first question, "Were you serving
 8 at the time"?
 9 **Q.** What relevance would that have?
 10 **A.** Because if you weren't using the counter at the
 11 point that it failed, then you -- if you'd
 12 logged out successfully and the counter was not
 13 in use, then there aren't going to be any
 14 transactions on the stack that haven't been
 15 settled, because you can't log out without
 16 settling the stack first.
 17 **Q.** Right. So it would only be affected, would it,
 18 if there were settlements currently going on?
 19 **A.** Yes, if a postmaster was serving, middle of the
 20 day, power cut, everything dies, in that case --
 21 or for some reason the screen freezes, you can't
 22 get any further -- that situation, where you
 23 were serving, then you would need to consider
 24 whether recovery is going to be necessary when
 25 you're able to log back on, either to that same

130

1 **A.** I'm not sure if anybody would ever seriously
 2 have used that flowchart. What would happen
 3 when somebody tried to log back -- when somebody
 4 was able to log back on to the counter again, if
 5 there were bill payments, if there had been
 6 a bill payment, which had been made but not
 7 settled, then the postmaster would actually have
 8 been prompted to say whether it's -- the bill
 9 had been paid or not, and that would have
 10 taken -- that should have sorted that out.
 11 Possibly banking transactions as well but
 12 I can't properly remember.
 13 If there were other things on the stack, for
 14 example a pension -- I mean, the postmasters
 15 I think were expected to know that -- but they
 16 might not have done -- that if it failed before
 17 settlement, they shouldn't have paid out the
 18 pension money, or whatever. But even if they
 19 didn't know that, if they had paid out the money
 20 but it hadn't settled, then, at the end of the
 21 day when they checked all their counterfoils
 22 against the report -- the totals on the report,
 23 that should have been apparent as a difference,
 24 and they could then have put it through at
 25 a later stage.

132

1 Q. But can I just understand this: if, for whatever
2 reason, the postmaster was struggling with this
3 and there remained a problem, would that be
4 ascribed as "user error"?

5 A. I'm not sure who would be doing that ascribing.

6 Q. All right. Well, let's look at the instance of
7 Mr Booth, who was the second temporary
8 subpostmaster at Marine Drive, who came in after
9 Mr Castleton was suspended. He got in touch
10 with the Post Office's lawyers to let them know
11 he'd experienced lost transactions when working
12 in the branch, as a result of a screen freeze.
13 Ultimately, it was presented in the case of *POL*
14 *v Castleton* as the system had worked as it
15 should and that any problem with disappearing
16 transactions was, in effect, a failure by
17 Mr Booth?

18 A. Yes, I don't think it should have been
19 categorised in that way.

20 Q. Well, can we just look at a sort of a snippet
21 from a document, which is POL00081826_022. If
22 we go to page 7, please. When the lawyers were
23 dealing with this and they were back and forth
24 with Fujitsu, specifically Brian Pinder, this
25 message at the top here -- so we can scroll up

133

1 A. The Riposte service on every counter closed down
2 and restarted at some point between 3.30 and
3 4.00.

4 Q. Okay, so that was everywhere, was it?

5 A. That was all counters, yes.

6 Q. All right. But, apart from that, which happened
7 every single night everywhere, any other
8 restarts can be considered unusual and could be
9 searched for?

10 A. Yes.

11 Q. It appears from the section in bold that that
12 was being undertaken. Do you see what I mean?

13 A. Yes, I see what you mean. I'm just looking at
14 dates. Yes, I have no recollection of
15 specifically looking for those things but, in --
16 so it could have happened, it may have happened.
17 I just can't remember.

18 Q. So you just don't know if that was you that was
19 trying to carry out that check for unusual
20 restarts?

21 A. Yeah, I don't remember, I could have done it.
22 You wouldn't see it so easily in the ARQ data,
23 but you would see it in the full message
24 extract.

25 Q. Given what you said to Mr Beer earlier about

135

1 just to sort of contextualise it -- on
2 2 November, this is an email from Mr Pinder to
3 Mr Dilley, with various others, the legal team,
4 in effect, copied in, and it says:
5 "Stephen.
6 "[I'm guessing] You might wish to note that
7 ..."
8 Then it appears that he's quoting from
9 something:
10 "Should the system be restarted (for any
11 reason -- including following a 'freeze'), there
12 will be evidence of this in the Audit trail
13 (which we have in fact been examining in this
14 case). Normally the only system restarts are as
15 part of the overnight 'ClearDesk' function that
16 occurs between 03.30 and 04.00 each day. Any
17 other restarts can be considered unusual and
18 could be searched for."
19 So if we just pick that apart, I suggest --
20 and you can correct me if I'm wrong -- that the
21 overnight ClearDesk function is what we spoke
22 about earlier, that there was an estate-wide
23 check for any problems with disks.

24 A. No, that's not what ClearDesk was.

25 Q. No?

134

1 working documents, and so forth, there's now no
2 way, really, of knowing if there were any
3 unusual reboots, is there?

4 A. The only other way you could do -- and I did try
5 looking a little bit the other day -- would be
6 to see if you've got log-ons with no matching
7 log-offs happening. That would be an indication
8 that the counter was restarted but that's the
9 only thing you could check for in what we have
10 left to us now.

11 Q. We do know that that applied in the case of the
12 overnight problem in early February, don't we?

13 A. No, that was a different case where there was no
14 log-off when there was a log-on of the same user
15 on a different counter. That was a different
16 thing. That wasn't a failure to log off.

17 Right. In that case, I could -- the log-off
18 was done successfully the night before the
19 counter failed and then, when we were looking at
20 transactions on 2 February, we could see that
21 Mr Castleton logged on and was using -- serving
22 on counter 1, and then the same user logged on
23 to counter 2, without logging off counter 1 but,
24 in that case, it doesn't appear that counter 1
25 became unusable, at that point. He just chose

136

1 to move from one system to the other.

2 **Q.** Well, just standing back and taking the view
3 overall, if we may. Whatever examination there
4 was for unusual restarts in Marine Drive we now
5 don't really have any conclusive evidence of it;
6 is that right?

7 **A.** There's -- I haven't been able to find any
8 evidence that it was happening but it is
9 a possibility that there were some and no, we
10 don't have anything that would be conclusive.

11 **Q.** All right. What that could have shown is
12 whether there were problems with screen freezes
13 and, therefore, potentially missing data
14 following screen freezes or it would have been
15 easier to find the possibility, if you'd found
16 unusual restarts; is that right?

17 **A.** Yes. But, as I said, it wouldn't necessarily
18 cause missing data, but it might --

19 **Q.** But it might do.

20 **A.** Potentially, there might have been sessions that
21 didn't settle but that wouldn't necessarily
22 cause discrepancies.

23 **Q.** No, but it might do?

24 **A.** Unlikely to but, yeah, it would depend on the
25 individual circumstances.

137

1 front of me"?

2 **A.** Yes.

3 **Q.** There is a little similarity here with some of
4 the other evidence you've given, even just the
5 evidence you've given just now, which is to say,
6 "I can't be sure, based on all the material that
7 I have in front of me now. There is potentially
8 other material", but also you tend to offer
9 an explanation, such as the explanation about
10 the engineer unplugging things or the
11 explanations that you've offered today about the
12 transactions being ones which might have been
13 picked up in reconciliations and so forth.

14 Your explanations or your hypotheses that
15 you put forward tend to explain it in terms of
16 supporting the system, in terms of making sure
17 that whatever problems there may have been,
18 there probably weren't, because of X, Y and Z;
19 do you agree?

20 **A.** Yes, I think that's a fair comment, but it's
21 based around 20 years, well, 15 years' knowledge
22 of how the system worked and a general feeling.
23 But, yes, I like to explain things and, you
24 know, in the past, I would have been able to
25 then back that up by looking at stuff that would

139

1 **Q.** All right. Going to the questions that you were
2 asked by Mr Castleton in the trial in 2006, we
3 can have a look at those at LCAS0001300. If we
4 go to page 271 and down to the bottom of that
5 page. If we just scroll down, the questions had
6 already started but the bit that I was going to
7 focus on is this:

8 **"Question:** But it does not show the
9 reconnection before disconnection again, does
10 it?

11 **"Answer:** Whether it was because the
12 engineer was briefly plugging things in and then
13 unplugging them again --"

14 If we scroll down a little:

15 **"Question:** It does actually occur in other
16 areas.

17 **"Answer:** -- I really cannot explain that,
18 not from this information. If I looked at it in
19 conjunction with other things --"

20 That's you then being a little taken by
21 surprise, is it?

22 **A.** Yes.

23 **Q.** So you're effectively saying there "I'm not
24 sure, the engineer may have been doing X, Y and
25 Z but I can't be sure, based on what I've got in

138

1 support it and, yes, I cannot do that any more
2 because we haven't got the evidence.

3 **Q.** All right. Well, the fact is, when branches had
4 hardware failure, which lost data, people in SSC
5 could insert it, couldn't they?

6 **A.** As a last resort, yes. That would be done in
7 order for the branch to balance correctly,
8 including transactions which they had carried
9 out but had failed to get to the places where
10 they should have been.

11 **Q.** The claim, as you put in your witness
12 statement -- and we don't necessarily need to go
13 there -- is that, when that happened, the SSC
14 were intending to put the branch accounts into
15 the -- or rather intending to put the system
16 into the state it would have been in in the
17 first place, if it hadn't had the failure.

18 **A.** Yes.

19 **Q.** What if the system problem was imperfectly
20 understood or imperfectly corrected? Sometimes,
21 the subpostmaster had no idea what was going on,
22 did they?

23 **A.** I can certainly think of one occasion when that
24 is true, yes.

25 **Q.** So --

140

1 A. But it -- yeah.

2 Q. -- in the circumstances where -- and, let's face
3 it, people in SSC are human beings and they
4 don't necessarily get it right -- in the
5 circumstances where someone in SSC has got it
6 wrong and the SPM, the subpostmaster, has no
7 idea of what has been happening, there would be
8 no way of identifying where the problems began
9 or ended, would there?

10 A. Do you mean no way of the postmaster identifying
11 that or for anybody else identifying that?

12 Q. Well, certainly for the subpostmaster and
13 I think you would have to agree with that; is
14 that right?

15 A. I think I would agree with that, yes.

16 Q. The only way anybody would be able to get to the
17 bottom of it at the other end is if they had the
18 raw data and if the person in SSC had left the
19 right sort of notes behind for people to know
20 what they'd done; is that right?

21 A. Yes, I think that's right. I would say that
22 these changes were extremely unusual. It was
23 certainly not something that was being done with
24 any regularity at all but probably a few times
25 a year, over all 18,000 branches, it was

141

1 would not have been able to use those numbers
2 because they were -- the sequence numbers were
3 being used by the person on the counter, logged
4 in on the counter at that time.

5 Q. All right. Disclosure. One short topic before
6 I have a final topic after that.

7 So on disclosure -- this won't take long --
8 was the extract from the message store that you
9 produced to do your report on week 42, was that
10 the full message store for the Marine Drive
11 branch?

12 A. It was the full set of messages in that
13 particular week.

14 Q. Oh, just for that week, all right.

15 A. It was just for that week was --

16 Q. So it wasn't for the whole period; it was just
17 week 42?

18 A. That was what I looked at when producing the
19 week 42 cash account or when attempting to.
20 But, subsequently, I am just about certain that
21 we did have all the messages for January and
22 February, which I did then look through. But
23 I have not got any --

24 Q. Any proof of that?

25 A. I haven't seen anything to prove that.

143

1 necessary to do -- it was felt necessary to do
2 some sort of correction.

3 Q. Is it because of the rarity of it that you do
4 not, effectively, countenance the possibility
5 that the pension transactions that you were
6 looking at with Mr Beer were inserted by SSC in
7 an attempt to rectify data that may have been
8 lost?

9 A. I totally discount that explanation because you
10 can see that they took place on counter 1, you
11 can see the session ID number. You can see that
12 Mr Castleton, or whoever was using LCA001, was
13 serving on counter 1. He did a whole set of
14 pension transactions in one session, possibly
15 catching up for things that had been paid out
16 manually during the morning because they'd been
17 reduced to working on a single counter.

18 That session was then suspended, node 2 came
19 back up Mr Castleton logged on to node 2, which
20 transferred these -- this suspended session
21 across from counter 1 and then you can see that
22 that session was eventually unsuspended and was
23 settled on counter 2. And that is quite clear
24 from the transaction numbers and the session
25 numbers, and anybody inserting those afterwards

142

1 Q. No.

2 A. But I know I spent a lot of time sitting there
3 and looking at the data over that whole period.

4 Q. The extract that we know did happen, because
5 otherwise you couldn't have written that report,
6 the week 42 extract, just thinking about the
7 disclosure explanation that you had from
8 Mr Dilley at the end of the case that you quoted
9 in your afterthoughts, really that should have
10 been disclosed, shouldn't it?

11 A. Yes.

12 Q. Was that ever passed to Mr Dilley with the
13 report; do you know?

14 A. I don't know because I was not responsible for
15 disclosure. There was something in that comment
16 that I quoted from Mr Dilley saying that he had
17 had sight of the message store and I can't
18 remember if it's in there or another document
19 from Mr Dilley saying that he'd offered
20 Mr Castleton sight of the message store but --

21 Q. Yes, certainly he'd offered him sight of the
22 message store.

23 A. Yes, but because it was so big and difficult --
24 and I don't know if that was just week 42 or if
25 that was for the entire period.

144

1 Q. But you can't be sure whether you gave the
 2 extract of week 42 to Mr Dilley, you just don't
 3 know?
 4 A. Me, personally, no, I didn't.
 5 Q. No. You didn't --
 6 A. No.
 7 Q. -- I see.
 8 SIR WYN WILLIAMS: Can I ask you, were you ever
 9 asked a direct question by Mr Dilley, or anybody
 10 I imagine, but let's say by anyone: during the
 11 course of your investigations, Mrs Chambers,
 12 have you created any documents which you
 13 consider might be relevant to the issues we are
 14 considering in this trial?
 15 A. I don't recall anybody ever asking me that
 16 question, no.
 17 SIR WYN WILLIAMS: All right. Thank you.
 18 MS PAGE: Then just your explanation about KELs and
 19 being told not to mention KELs and, indeed, to
 20 positively refer to other documents, rather than
 21 KELs. Again, that's something which, looking
 22 back, it would have met that disclosure
 23 obligation that Mr Dilley set out for you and
 24 you set out in your afterthoughts, wouldn't it?
 25 A. Yes.

145

1 in that document, but for no reason.
 2 Q. Did it not strike you even then as perhaps
 3 slightly suspicious that nobody wanted you to
 4 mention known error logs with that title being
 5 what it was?
 6 A. I don't think I thought of it as suspicious.
 7 I thought it seemed strange but, as I said,
 8 I was in a very unfamiliar situation.
 9 Q. All right. Well, finally, a few questions on
 10 what I think will be just a short final topic.
 11 Did you believe that Horizon was fundamentally
 12 robust in 2004 --
 13 A. Fundamentally, yes.
 14 Q. -- and still in 2006?
 15 A. Yes.
 16 Q. Confirmation bias happens when we filter all the
 17 evidence we receive to only take account of
 18 those parts which support what we already
 19 believe to be true. Are you familiar with that
 20 concept?
 21 A. I'm familiar with the concept, yes.
 22 Q. When you gave evidence in 2006, do you think you
 23 were affected by confirmation bias, your belief
 24 in the fundamental robustness of Horizon?
 25 A. No, because I knew I had looked in great deal at

147

1 Q. All right. Now, why did accept that you
 2 shouldn't refer to KELs?
 3 A. I assumed that -- that's what they said and so
 4 that's what I did. Perhaps I should have
 5 questioned it but I was in a very unfamiliar
 6 situation for me, and --
 7 Q. Why didn't you mention it in your afterthoughts
 8 document? Because, at that stage, obviously,
 9 you had been told by Mr Dilley what you'd been
 10 told about your disclosure obligations and, as
 11 we've just agreed, KELs would have been
 12 disclosable under that test. So why not mention
 13 the problem with you being told that you
 14 shouldn't refer to KELs in your afterthoughts?
 15 A. I thought I did. Did I mention PEAKs in there?
 16 Q. You certainly talked about including things like
 17 the event logs on the back of PEAKs and making
 18 sure that people had PEAKs, but not KELs.
 19 A. Yes, that was an oversight on my part when
 20 I wrote the afterthoughts document, then.
 21 I mean, I perhaps thought that PEAKs, you
 22 know -- it wasn't just the KELs that weren't
 23 being disclosed; it was PEAKs, which I think, to
 24 me, I thought was important as well but, yes,
 25 maybe KELs equally so, but I didn't include it

146

1 the available evidence, and I was looking for
 2 any sign of a system problem and the numbers
 3 added up. It wasn't that the discrepancies were
 4 being calculated wrongly.
 5 Q. But you believed the system to be fundamentally
 6 robust, didn't you?
 7 A. No, not necessarily. No, I mean, if there had
 8 been any sign that the numbers were not adding
 9 up, then I would have been onto it and I would
 10 have said so. But the discrepancies were
 11 calculated correctly, based on the transactions
 12 that had been recorded. There were no obviously
 13 incorrect transactions in what I could see of
 14 the system.
 15 All I could conclude was that what was on
 16 the system was not an accurate reflection of
 17 what had taken place at the branch and there was
 18 nothing that indicated that the system had
 19 malfunctioned in any way that would give rise to
 20 transactions either not being on the system or
 21 being there but there incorrectly. But,
 22 fundamentally, that -- finally, that could only
 23 be ascertained by comparing what was on the
 24 system with what had actually taken place at the
 25 branch and once the day/the week has passed,

148

1 that becomes almost impossible to verify.
 2 **Q.** Are you still, at some level, trying to cover
 3 off or explain away those anomalies or issues
 4 which we can see?
 5 **A.** No, where there have been anomalies, for example
 6 the missing 92p in the ARQ data, I've found
 7 that, I've investigated it, I've checked what
 8 the consequences of that are and I have reported
 9 it. Whether that report didn't get through to
 10 Mr Castleton and his team, I don't know, because
 11 I was not reporting direct to him, but I had no
 12 intention of covering that up.
 13 **Q.** Do you now believe that the case against
 14 Mr Castleton resulted in a miscarriage of
 15 justice?
 16 **A.** I think Mr Castleton should have been given much
 17 more help in trying to work out why the money in
 18 his branch did not match what was on the system,
 19 and I wish, really wish, I could find a problem.
 20 I've still been looking to see if there's just
 21 anything that looks as if it could be something
 22 wrong with the system that might have caused it
 23 but I found nothing in 2004.
 24 And, okay, you can say I didn't look hard
 25 enough then. I did what I -- I didn't know that
 149

1 you've given evidence before me over very many
 2 hours. For all those things, I thank you very
 3 much.
 4 **MR BEER:** Thank you very much, sir. We reconvene at
 5 10.00 tomorrow morning.
 6 **SIR WYN WILLIAMS:** Yes.
 7 **MR BEER:** Thank you.
 8 (2.56 pm)
 9 (The hearing adjourned until 10.00 am
 10 the following day)
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1 this would still be being talked about.
 2 **Q.** No.
 3 **A.** I did a reasonable job in 2004, which I then
 4 gave evidence on. I rechecked, looking for
 5 errors, not looking for explanations of why
 6 there weren't errors, in 2006. I continued to
 7 wonder if there was something I had missed. If
 8 it was, what could it be? I've never found any
 9 error in Horizon -- Legacy Horizon that could
 10 have caused Mr Castleton's losses and, so,
 11 yes --
 12 **Q.** You now, do you, say that if there was an error
 13 in Horizon, it's one that you simply didn't
 14 find?
 15 **A.** It's one that had -- that left no evidence and
 16 that nobody has ever found, if there was such
 17 an error, if there could even be such an error.
 18 **MS PAGE:** Thank you. Those are my questions.
 19 **SIR WYN WILLIAMS:** Thank you, Ms Page.
 20 Is that it, Mr Beer?
 21 **MR BEER:** Yes, it is, sir, unless you have any
 22 questions?
 23 **SIR WYN WILLIAMS:** No, thank you.
 24 It's obvious that you have provided two very
 25 detailed witness statements, Mrs Chambers, and
 150

I N D E X

ANNE OLIVIA CHAMBERS (continued)	1
Questioned by MR BEER (continued)	1
Questioned by MS PAGE	119

MR BEER: [17] 1/5 1/8 50/11 50/16 50/18 50/22 50/25 91/2 91/6 91/14 91/18 91/21 119/5 119/12 150/21 151/4 151/7	1300 [1] 125/14 14 [9] 12/20 81/8 96/12 101/10 101/25 105/2 105/6 106/15 108/11 14.20 [2] 122/15 122/16 15 [1] 139/21 15.16 [1] 11/13 15.16.54 [1] 8/3 16.05.10 [1] 108/6 17 [3] 13/22 122/22 122/24 17 August 2006 [1] 18/23 17.06.59 [1] 4/9 17.31.20 [1] 4/19 17.38.43 [1] 5/15 17th August 2006 [1] 51/7 18 [2] 33/5 123/2 18,000 [2] 21/3 141/25 19 [4] 38/15 38/15 106/8 123/22 1p [1] 6/11 1st [1] 89/9	22 [1] 9/1 23 [1] 51/4 24 [1] 57/20 25 [1] 65/18 25 February 2013 [1] 96/9 25 July 2006 [1] 17/12 26 February [3] 39/1 40/15 41/1 26 February 2004 [2] 32/24 50/3 27 September 2023 [1] 1/1 271 [1] 138/4 28 February [1] 108/10 28th [1] 107/3 29 [1] 127/24 29 January [1] 87/11 29 January 2007 [3] 36/2 63/14 87/12 2p [1] 6/11	6 March [1] 108/6 61 [2] 38/14 38/16 6295 [3] 101/11 101/14 101/16 69 [1] 17/10	146/10 146/16 150/1 absolutely [2] 41/3 56/19 accept [1] 146/1 access [4] 38/9 62/16 75/5 128/5 accompanied [1] 17/3 account [27] 4/7 7/1 7/2 7/5 7/6 25/6 26/3 26/7 26/11 33/9 34/7 42/6 51/10 58/2 58/10 58/14 88/12 88/16 89/18 94/22 95/3 98/6 98/22 107/18 121/2 143/19 147/17 accountancy [2] 54/3 54/4 accountant [1] 54/13 accounting [1] 27/5 accounts [11] 21/18 26/13 51/14 58/6 67/1 106/2 106/11 110/11 111/3 121/15 140/14 accumulated [2] 81/23 82/16 accuracy [2] 115/18 115/19 accurate [4] 60/23 116/4 116/22 148/16 accurately [4] 9/16 10/19 71/15 120/12 acknowledge [1] 124/6 acknowledged [2] 48/12 48/16 acknowledgement [1] 49/1 across [2] 127/4 142/21 action [6] 16/12 21/25 23/23 23/23 90/22 122/16 actual [1] 114/10 actually [15] 22/25 35/19 37/15 41/17 55/7 55/19 58/14 80/23 85/17 92/25 96/21 123/1 132/7 138/15 148/24 add [2] 8/25 56/8 added [2] 103/15 148/3 adding [4] 53/10 53/15 54/5 148/8 address [2] 86/14 86/15 addressed [2] 89/3 89/5 addressing [2] 49/22 51/11 adjourned [1] 151/9 Adjournment [1] 91/16
MS PAGE: [3] 119/14 145/18 150/18	15 [1] 139/21 15.16 [1] 11/13 15.16.54 [1] 8/3 16.05.10 [1] 108/6 17 [3] 13/22 122/22 122/24 17 August 2006 [1] 18/23 17.06.59 [1] 4/9 17.31.20 [1] 4/19 17.38.43 [1] 5/15 17th August 2006 [1] 51/7 18 [2] 33/5 123/2 18,000 [2] 21/3 141/25 19 [4] 38/15 38/15 106/8 123/22 1p [1] 6/11 1st [1] 89/9	26 February 2004 [2] 32/24 50/3 27 September 2023 [1] 1/1 271 [1] 138/4 28 February [1] 108/10 28th [1] 107/3 29 [1] 127/24 29 January [1] 87/11 29 January 2007 [3] 36/2 63/14 87/12 2p [1] 6/11	7	74 [1] 51/6 76 [1] 54/11
SIR WYN WILLIAMS: [12] 1/7 50/14 50/17 50/24 91/12 91/20 119/11 145/8 145/17 150/19 150/23 151/6	2	3	8	8
'	2 February [3] 122/11 122/17 136/20 2 January [2] 100/15 104/12 2 November [1] 134/2 2.56 [1] 151/8 20 years [1] 139/21 20,000 [1] 9/3 2004 [17] 19/19 32/24 33/3 36/17 39/2 40/15 44/17 50/3 54/25 66/5 68/2 76/14 77/20 122/11 147/12 149/23 150/3 2006 [19] 8/9 17/12 18/23 33/13 34/5 36/11 42/19 44/16 44/18 51/7 58/24 60/15 74/4 122/8 126/18 138/2 147/14 147/22 150/6 2007 [6] 36/2 63/14 84/13 86/3 87/11 87/12 2010 [3] 95/7 105/1 110/19 2010/2011 [1] 110/18 2011 [2] 105/4 110/18 2012 [2] 95/18 105/4 2013 [4] 95/22 96/1 96/9 97/2 2023 [1] 1/1 21 [1] 123/23	3.30 [1] 135/2 30 [1] 65/18 300 [1] 5/23 31 January [1] 97/25 39-odd [1] 100/12 39.57 [2] 97/19 98/17	8 January [1] 3/5 8 September [1] 126/7	9
'Advice [2] 13/18 78/11	2 February [3] 122/11 122/17 136/20 2 January [2] 100/15 104/12 2 November [1] 134/2 2.56 [1] 151/8 20 years [1] 139/21 20,000 [1] 9/3 2004 [17] 19/19 32/24 33/3 36/17 39/2 40/15 44/17 50/3 54/25 66/5 68/2 76/14 77/20 122/11 147/12 149/23 150/3 2006 [19] 8/9 17/12 18/23 33/13 34/5 36/11 42/19 44/16 44/18 51/7 58/24 60/15 74/4 122/8 126/18 138/2 147/14 147/22 150/6 2007 [6] 36/2 63/14 84/13 86/3 87/11 87/12 2010 [3] 95/7 105/1 110/19 2010/2011 [1] 110/18 2011 [2] 105/4 110/18 2012 [2] 95/18 105/4 2013 [4] 95/22 96/1 96/9 97/2 2023 [1] 1/1 21 [1] 123/23	4	9,000-odd [2] 100/10 100/16 9,839.45 [2] 97/22 98/18 900 [1] 125/13 92p [2] 26/22 149/6 9th [1] 125/15	9
'ClearDesk' [1] 134/15	2	4.00 [1] 135/3 4.20 [1] 104/23 4.51 [1] 104/13 40 [1] 128/8 41 [6] 12/21 14/6 26/14 26/15 119/20 120/17 42 [16] 12/21 14/6 18/11 22/9 25/6 26/13 26/16 26/17 51/20 119/25 143/9 143/17 143/19 144/6 144/24 145/2 421 [2] 25/21 26/22 43 [2] 26/14 26/18 43,013.92 [2] 4/17 5/4 45 [1] 100/2	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18	A
'document' [1] 71/21	2	5	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18
'event' [1] 72/10	5	5 February [1] 89/1 5,500-odd [1] 6/7 5.02 [1] 100/2 51 [3] 13/21 13/22 14/6 56 [2] 33/5 33/8 59 [1] 33/8	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18
'freeze' [1] 134/11	5	6	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18
'gain' [1] 100/15	6	6 February [3] 97/18 98/1 100/9	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 32/11 32/17 34/11 36/16 37/17 37/23 39/14 39/15 40/3 40/4 40/13 41/16 41/19 42/24 43/1 43/3 43/4 43/5 43/6 43/20 44/5 45/12 45/17 46/4 48/13 49/17 50/1 50/10 51/2 52/16 60/25 61/6 61/19 61/20 62/9 62/13 63/7 64/2 65/6 65/20 67/24 70/18 72/21 73/18 76/5 77/21 81/6 81/7 82/3 84/22 85/5 85/14 85/15 85/16 85/20 85/21 85/22 86/10 86/11 89/1 92/20 93/18 104/17 108/10 110/10 111/2 111/23 111/25 113/6 114/17 115/22 117/6 119/6 126/21 128/20 129/21 131/12 131/13 134/22 135/25 139/9 139/11 143/20 144/6 145/18
'In' [1] 71/17	6	6 February [3] 97/18 98/1 100/9	AA [1] 97/18 able [15] 16/12 48/7 68/3 84/4 120/17 129/1 129/7 130/25 131/15 131/23 132/4 137/7 139/24 141/16 143/1 about [105] 2/18 3/17 4/16 5/2 5/23 15/19 17/13 21/6 22/19 22/23 23/1 29/22 30/22 31/9 31/15 31/17 32/3 3	

A	85/23 86/24 89/10 97/24 98/19 101/10 101/17 102/7 102/11 102/15 105/3 107/20 114/22 122/9 126/11 127/12 132/21 133/6 135/5 135/6 137/11 138/1 139/6 140/3 141/24 141/25 143/5 143/14 143/21 145/17 146/1 147/9 147/16 148/15 151/2	114/8 152/2 Anne's [1] 59/25 anomalies [5] 16/21 109/2 109/6 149/3 149/5 anomaly [3] 104/14 121/3 121/4 another [7] 29/13 29/22 34/23 61/18 72/16 75/2 144/18 answer [6] 31/25 37/25 50/7 62/22 123/16 129/7 answered [5] 110/10 111/2 111/17 123/13 126/19 answering [1] 67/23 answers [3] 66/10 105/11 106/25 any [96] 2/8 10/9 10/21 11/15 13/6 16/21 21/20 23/19 24/25 28/7 28/7 28/18 30/16 33/10 33/13 33/14 34/1 37/5 38/2 39/23 40/6 40/10 41/10 41/16 53/11 54/16 54/23 57/9 62/7 62/18 63/5 63/8 64/25 66/6 66/25 71/5 71/17 71/22 76/2 76/2 76/6 77/8 79/22 83/3 83/11 84/4 88/18 89/11 92/13 92/15 94/8 98/20 100/22 101/3 101/7 105/12 106/6 106/10 106/17 110/10 111/2 112/22 114/14 114/19 115/25 116/3 120/8 121/10 123/5 123/9 127/14 127/19 129/6 129/12 130/5 130/13 130/22 131/4 133/15 134/10 134/16 134/23 135/7 136/2 137/5 137/7 140/1 141/24 143/23 143/24 145/12 148/2 148/8 148/19 150/8 150/21 anybody [11] 40/10 65/15 69/13 85/12 111/18 132/1 141/11 141/16 142/25 145/9 145/15 anyone [4] 2/16 32/19 41/19 145/10 anything [36] 2/19 4/12 7/15 15/3 15/11 28/8 28/18 37/16 37/20 37/25 41/4 41/16 42/2 55/3 55/9 65/16 65/19 66/21 68/21 68/25 71/22 76/8 76/11 76/13	76/14 83/13 85/21 89/25 90/3 104/15 115/9 115/11 131/19 137/10 143/25 149/21 anyway [3] 62/6 92/24 94/4 anywhere [2] 27/20 93/8 apart [3] 53/19 134/19 135/6 Apologies [1] 1/8 apparent [1] 132/23 apparently [1] 8/18 appear [10] 3/10 3/13 9/3 53/9 69/10 83/2 91/1 100/23 119/15 136/24 appearance [2] 34/22 127/2 appeared [6] 1/20 54/1 69/9 93/4 93/9 116/20 appears [12] 28/16 60/11 61/17 62/11 99/1 100/12 121/3 121/4 121/15 124/18 134/8 135/11 applied [1] 136/11 appreciable [1] 49/21 appreciate [3] 65/4 83/9 114/15 approach [6] 36/23 45/2 63/18 64/18 76/19 94/15 approached [4] 34/16 65/11 65/21 65/22 approaching [1] 34/24 appropriate [2] 16/13 50/12 appropriately [1] 77/9 approved [2] 117/10 118/7 approximately [1] 125/12 archive [2] 21/21 44/3 archived [6] 19/17 41/9 44/1 74/6 74/13 74/21 archiving [3] 105/25 106/19 110/21 are [68] 8/12 8/12 9/5 9/15 10/19 11/1 11/4 19/14 23/4 25/9 25/16 27/25 28/22 41/19 47/8 47/20 47/21 49/4 52/2 52/8 53/4 56/16 56/25 57/1 57/13 60/12 62/10 62/13 62/14 62/15 62/19	63/16 65/5 67/11 72/11 72/24 74/13 74/16 74/19 74/20 74/21 78/5 79/1 81/7 82/22 85/23 88/11 91/2 93/15 96/15 100/18 103/6 105/5 106/8 108/13 110/10 111/1 111/12 111/16 119/9 129/11 134/14 141/3 145/13 147/19 149/2 149/8 150/18 area [5] 32/23 34/6 58/19 96/19 126/18 areas [3] 49/8 89/21 138/16 aren't [2] 9/11 130/13 argument [3] 32/3 32/14 32/18 arising [1] 115/23 arithmetic [2] 10/16 53/5 around [8] 14/15 31/23 61/20 69/17 122/15 122/16 127/13 139/21 ARQ [24] 1/19 3/8 3/11 19/22 19/25 20/10 20/15 20/17 20/18 21/12 22/7 25/21 25/23 26/22 27/4 38/9 38/10 53/21 72/20 73/2 73/23 119/20 135/22 149/6 as [128] 2/8 4/3 4/3 4/24 5/10 5/11 7/9 12/4 13/13 15/1 16/12 16/18 17/8 17/22 18/1 22/22 23/20 24/10 25/20 26/6 27/7 29/16 30/3 31/25 33/17 34/7 34/12 36/7 38/5 40/8 40/9 40/20 41/3 41/5 41/6 41/6 42/21 47/4 48/5 48/12 52/4 53/7 55/18 57/12 57/18 60/22 61/14 63/23 65/9 67/6 67/6 67/18 67/23 69/2 69/10 69/21 70/4 73/10 73/14 74/14 75/13 75/13 76/9 80/16 80/17 85/4 85/9 85/13 86/22 89/7 90/6 90/8 90/25 92/25 93/7 93/20 94/10 95/9 95/19 96/21 96/21 97/2 97/2 99/4 101/15 101/15 105/20 105/20 106/21 109/13 112/3 113/4 113/24 113/25 115/7 116/4 116/4 116/17 116/20 118/11 119/15 123/6 123/22
----------	---	--	---	--

A	69/3	98/13 98/16 100/8 120/18 140/7	50/9 53/6 53/16 53/19 53/20 53/25 54/1 55/9 55/12 55/15 55/17 56/20 60/7 60/15 60/23 60/24 61/5 62/9 62/15 66/12 67/5 68/5 71/4 71/5 71/7 72/1 73/15 73/24 75/11 75/12 76/7 76/9 77/1 80/22 80/25 85/2 92/23 93/16 94/3 96/12 97/6 97/7 99/5 99/6 99/21 100/1 101/4 101/21 102/8 103/1 104/11 105/1 105/3 106/19 108/19 110/17 110/20 110/21 111/9 111/13 111/22 112/7 112/12 113/23 116/23 118/12 122/2 124/2 124/19 125/4 126/25 127/15 129/18 130/3 130/14 131/23 132/5 132/6 132/8 132/9 132/23 133/18 134/13 137/7 137/14 137/20 138/24 139/12 139/17 139/24 140/10 140/16 141/7 142/7 142/15 142/16 143/1 144/10 146/9 146/9 146/11 148/8 148/9 148/12 149/5 149/16 149/20	80/1 85/14 85/19 85/19 89/16 98/20 107/19 110/9 110/14 110/15 111/4 115/7 116/15 117/2 118/5 118/7 124/1 126/8 135/12 138/20 139/12 141/23 143/3 145/19 146/13 146/23 147/4 148/4 148/20 148/21 150/1
as... [25] 124/15 124/15 125/7 126/19 126/19 127/5 128/10 128/12 132/11 132/23 133/4 133/12 133/14 133/14 134/14 137/17 139/9 140/6 140/11 146/10 146/24 147/2 147/6 147/7 149/21	attention [1] 52/1 attributable [1] 47/11 attribute [1] 21/9 audit [15] 17/3 19/21 22/15 22/23 25/25 27/19 44/2 74/6 74/13 74/21 75/3 75/5 111/7 111/22 134/12 audited [6] 19/17 22/21 27/9 27/20 41/9 122/6 August [2] 18/23 51/7 authored [2] 24/4 24/5 automatic [1] 110/21 autumn [3] 60/15 64/24 105/1 availability [1] 64/23 available [8] 27/10 27/20 45/10 45/11 93/23 104/4 127/1 148/1 avoided [2] 8/19 79/21 aware [18] 32/2 32/8 32/16 33/2 33/22 37/6 38/2 69/3 69/5 69/8 69/13 71/2 74/6 74/8 74/16 75/22 90/25 117/11 away [3] 44/12 129/10 149/3 awful [1] 15/13 awkward [1] 43/2 awkwardness [1] 43/5	Baldwin [1] 32/5 banking [2] 129/18 132/11 Bansal [1] 108/12 base [1] 10/9 based [7] 24/5 82/25 126/23 138/25 139/6 139/21 148/11 basic [1] 40/3 Basically [1] 129/7 basing [1] 81/19 basis [1] 27/24 be [194] bear [1] 65/22 bearing [1] 120/2 became [2] 71/6 136/25 because [76] 2/1 2/16 5/20 8/7 9/11 12/13 14/7 15/8 20/9 20/24 21/12 24/14 28/8 28/24 28/24 30/10 30/15 31/8 32/11 32/21 33/3 35/22 41/3 42/7 42/23 43/24 44/5 44/10 46/7 47/1 50/4 50/9 57/1 60/23 70/17 71/15 73/10 75/4 75/9 75/22 76/11 80/3 91/9 93/5 96/18 101/1 101/21 102/9 103/24 106/18 108/1 112/11 115/5 116/4 117/21 118/24 121/13 121/16 122/2 126/12 126/20 130/10 130/15 138/11 139/18 140/2 142/3 142/9 142/16 143/2 144/4 144/14 144/23 146/8 147/25 149/10 become [1] 33/16 becomes [1] 149/1 been [150] 1/21 2/9 2/10 4/9 9/21 14/9 18/11 19/21 20/5 20/14 21/6 21/10 21/18 21/21 26/10 27/5 27/7 27/14 28/10 28/16 28/22 29/7 31/13 32/13 33/10 33/15 33/25 34/16 37/5 39/21 42/18 42/25 43/7 43/18 45/16 45/21 46/13 46/14 49/4 49/12 49/14 49/20 49/21	50/9 53/6 53/16 53/19 53/20 53/25 54/1 55/9 55/12 55/15 55/17 56/20 60/7 60/15 60/23 60/24 61/5 62/9 62/15 66/12 67/5 68/5 71/4 71/5 71/7 72/1 73/15 73/24 75/11 75/12 76/7 76/9 77/1 80/22 80/25 85/2 92/23 93/16 94/3 96/12 97/6 97/7 99/5 99/6 99/21 100/1 101/4 101/21 102/8 103/1 104/11 105/1 105/3 106/19 108/19 110/17 110/20 110/21 111/9 111/13 111/22 112/7 112/12 113/23 116/23 118/12 122/2 124/2 124/19 125/4 126/25 127/15 129/18 130/3 130/14 131/23 132/5 132/6 132/8 132/9 132/23 133/18 134/13 137/7 137/14 137/20 138/24 139/12 139/17 139/24 140/10 140/16 141/7 142/7 142/15 142/16 143/1 144/10 146/9 146/9 146/11 148/8 148/9 148/12 149/5 149/16 149/20 BEER [6] 1/4 91/12 135/25 142/6 150/20 152/4 Beezer [1] 59/7 before [34] 2/10 28/5 29/11 33/12 33/13 37/22 39/11 43/21 64/22 65/2 66/5 67/6 67/10 69/11 77/13 77/23 80/22 85/6 91/22 91/25 92/10 92/21 93/14 101/2 107/21 118/2 118/13 121/2 131/13 132/16 136/18 138/9 143/5 151/1 before' [1] 77/10 began [1] 141/8 beginning [4] 21/23 51/14 107/7 117/1 begins [1] 127/24 behind [1] 141/19 being [56] 8/12 11/5 16/8 17/8 24/13 24/17 24/25 32/12 40/20 42/23 43/5 62/19 63/24 67/22 68/8 69/1 69/20 71/2 72/17 74/25 75/21 76/21 77/23 78/13 79/24	85/19 89/16 98/20 107/19 110/9 110/14 110/15 111/4 115/7 116/15 117/2 118/5 118/7 124/1 126/8 135/12 138/20 139/12 141/23 143/3 145/19 146/13 146/23 147/4 148/4 148/20 148/21 150/1 beings [1] 141/3 belief [1] 147/23 believe [13] 17/20 56/6 58/11 59/19 62/2 79/22 103/24 104/7 109/13 113/25 147/11 147/19 149/13 believed [3] 18/12 25/2 148/5 believer [1] 27/11 best [6] 12/2 13/13 15/5 32/22 60/22 87/1 better [4] 3/7 66/17 80/8 126/15 between [21] 10/16 11/2 24/22 25/9 39/25 44/6 44/7 47/23 49/9 51/21 52/10 53/1 66/23 111/5 113/4 118/18 125/9 125/10 125/14 134/16 135/2 beyond [3] 40/14 54/22 65/16 bias [2] 147/16 147/23 big [2] 15/12 144/23 bill [4] 129/13 132/5 132/6 132/8 bit [12] 33/6 35/10 35/22 44/10 52/16 75/15 84/9 118/14 124/24 124/25 136/5 138/6 bits [1] 126/25 black [1] 78/24 blamed [1] 68/8 blaming [1] 67/3 blank [1] 60/10 blocks [1] 127/5 blunder [1] 70/24 bold [1] 135/11 Bond [2] 17/13 59/7 books [2] 6/18 120/3 Booth [2] 133/7 133/17 bordering [2] 123/5 123/19 both [13] 7/9 8/9 9/2 26/11 57/16 77/20 77/21 86/13 89/23 94/11 115/2 120/19 125/8 bottom [11] 14/1

B	broken [1] 124/2	17/11 18/3 18/8 18/16	87/22 88/1 88/18 89/7	centre [2] 9/5 125/9
bottom... [10] 19/1	Brought [2] 26/15	18/16 18/23 18/25	89/9 91/4 92/21	certain [3] 93/1
59/22 67/15 82/13	26/17	19/1 20/8 22/4 22/14	109/20 110/9 111/1	129/11 143/20
83/3 109/9 109/10	BRSS [3] 103/5	22/17 23/25 24/9 29/4	111/16 111/22 125/8	certainly [24] 2/22
113/15 138/4 141/17	103/6 103/7	29/9 33/4 35/21 36/1	130/20 133/13 134/14	14/20 17/5 17/25 48/6
bounced [3] 77/23	BTS [1] 110/17	37/17 38/13 38/13	136/11 136/13 136/17	48/16 48/22 49/11
79/7 80/9	bug [23] 20/16 20/17	50/22 50/24 51/1 51/4	136/24 144/8 149/13	50/14 55/11 60/20
bouncing [1] 80/3	20/17 45/13 45/18	52/19 52/22 58/22	cases [15] 9/2 37/6	61/9 67/7 74/1 79/17
BP5 [1] 98/16	49/18 49/22 52/15	59/13 60/22 61/14	72/10 72/13 72/15	80/19 92/15 109/17
Bracknell [2] 38/20	61/18 94/23 94/25	62/16 63/10 63/11	72/23 72/25 73/20	131/7 140/23 141/12
57/3	95/3 95/4 95/19 95/21	64/18 66/2 70/22	79/8 80/5 80/21 84/2	141/23 144/21 146/16
branch [53] 5/16	96/11 96/15 96/16	82/23 84/8 87/8 87/9	85/25 93/3 105/5	chain [1] 118/19
9/18 10/10 10/14	97/3 97/9 117/7	89/18 91/18 91/20	cash [46] 4/6 4/22	Chairman [3] 29/20
12/24 16/18 21/5	118/21 119/6	94/14 95/24 96/1 96/8	4/24 5/3 5/8 5/12 5/15	30/7 94/16
21/15 21/20 47/11	bugs [5] 80/20 91/7	100/6 100/25 105/20	5/17 5/18 5/20 5/22	chambers [14] 1/3
48/23 53/24 55/7	91/23 94/14 94/18	107/15 110/1 113/8	7/1 7/2 7/5 7/6 8/15	1/10 25/4 51/1 59/8
55/18 55/20 73/20	built [1] 7/7	113/10 113/16 114/6	8/18 8/22 8/23 9/4	59/10 59/12 59/24
75/13 90/20 95/13	business [10] 12/25	114/12 114/22 117/5	9/14 9/19 10/1 10/4	91/22 119/8 119/15
96/5 97/12 97/16 98/1	13/4 14/11 56/7 56/13	120/11 120/16 121/6	10/8 10/10 10/12 11/4	145/11 150/25 152/2
99/15 99/16 99/19	57/16 80/17 82/14	121/9 121/11 124/17	25/6 26/3 26/7 26/11	change [2] 95/9
100/20 102/8 102/12	82/21 115/24	124/20 124/25 126/11	26/13 42/6 51/10	100/2
102/16 103/7 104/12	but [207]	127/23 128/14 128/17	51/14 58/2 58/9 58/14	changed [1] 99/13
104/17 104/21 106/2	C	128/23 131/6 133/1	60/11 62/11 98/5	changes [5] 102/20
106/11 107/9 107/11	calculate [2] 52/18	133/20 133/25 134/17	107/18 121/2 121/20	111/3 111/25 115/2
107/16 107/17 108/3	58/1	134/20 135/8 138/3	143/19	141/22
112/15 114/16 114/18	calculated [5] 53/1	140/23 142/10 142/11	Castleton [39] 2/17	changing [2] 112/4
124/22 125/17 133/12	53/2 53/6 148/4	142/11 142/21 145/8	6/22 13/12 13/17	112/5
140/7 140/14 143/11	148/11	149/4 149/24	13/24 14/8 14/17	charged [1] 24/25
148/17 148/25 149/18	calculation [1] 52/25	can't [32] 15/10 18/7	17/14 18/12 24/12	chat [3] 34/10 92/16
branches [31] 13/3	call [29] 4/4 11/16	20/25 37/21 39/18	25/14 26/7 29/13	99/11
15/3 21/3 62/4 63/1	12/11 12/17 14/21	46/2 61/23 83/13	33/12 34/5 44/24 47/9	check [18] 10/5
75/14 81/8 81/13	15/6 32/24 33/3 34/8	92/17 93/1 96/20	50/4 62/6 72/5 81/17	12/24 23/19 26/19
82/15 95/6 96/13	36/16 37/23 48/13	96/22 96/25 100/19	83/1 87/22 88/1 91/3	26/21 33/20 42/9
102/11 105/2 105/3	49/2 66/4 66/24 68/5	103/19 104/19 109/15	119/17 121/22 126/17	52/22 56/2 67/2 67/12
105/7 106/6 106/8	72/1 77/23 79/5 97/12	112/2 112/25 113/6	131/6 133/9 133/14	93/6 109/12 115/16
108/12 108/15 108/17	99/6 99/19 100/1	121/23 122/8 127/7	136/21 138/2 142/12	122/8 134/23 135/19
111/10 112/3 114/11	102/20 103/5 108/8	130/15 130/21 131/4	142/19 144/20 149/10	136/9
114/17 114/24 115/12	108/10 109/25 113/24	132/12 135/17 138/25	149/14 149/16	checked [10] 11/7
115/16 115/17 119/4	called [4] 89/18 99/3	139/6 144/17 145/1	Castleton's [7] 15/5	27/18 29/6 53/17 67/5
140/3 141/25	99/7 102/7	cannot [8] 10/2 27/16	18/10 29/16 30/1	122/7 122/7 127/16
branches' [3] 102/9	Callendar [4] 45/13	28/25 77/14 78/23	81/20 84/1 150/10	132/21 149/7
110/11 111/2	45/18 49/18 49/22	128/6 138/17 140/1	catching [1] 142/15	checking [9] 9/14
BRDB [1] 110/17	calls [23] 13/11	CAP42 [4] 22/3 22/8	categories [1] 12/2	29/5 53/22 55/6 55/7
break [4] 50/13 50/20	14/17 46/4 48/17 49/3	42/5 51/10	categorised [1]	56/15 58/21 118/22
91/9 91/10	49/6 52/6 63/20 76/5	CAP45 [1] 123/11	133/19	127/4
breakdown [1]	77/18 77/21 78/12	capital [4] 39/6 39/6	category [2] 11/18	checklist [1] 127/25
120/18	78/12 78/19 79/3	39/7 39/7	11/23	checks [14] 8/12
breaking [1] 92/19	79/17 79/24 80/1	captured [1] 42/4	Cath [1] 59/18	27/8 27/13 27/23
breath [1] 114/9	80/24 96/23 99/7	carefully [1] 67/3	cause [16] 8/15 9/8	28/21 29/4 41/16
Brian [9] 18/5 32/7	113/1 114/1	carried [6] 26/14	9/10 13/17 21/20	42/10 56/20 96/24
34/8 35/14 39/21	came [8] 18/4 34/6	26/16 40/12 97/24	95/17 102/17 104/23	109/1 109/5 109/13
46/17 87/14 87/23	35/12 35/14 80/7	119/25 140/8	105/22 106/10 107/4	115/8
133/24	122/16 133/8 142/18	carry [3] 123/21	115/3 123/11 124/4	Cheques [1] 8/12
Brian Pinder [6] 18/5	can [131] 1/5 1/7	128/19 135/19	137/18 137/22	choice [2] 32/19 41/2
34/8 35/14 46/17	1/12 1/14 2/11 2/24	case [54] 2/15 12/4	caused [10] 11/2	choosing [1] 35/3
87/14 133/24	2/25 2/25 3/2 3/4 3/7	17/13 27/12 28/2	11/5 23/8 44/9 95/18	chose [3] 11/23
brief [1] 49/24	3/16 3/16 3/24 3/25	28/20 29/13 29/16	111/10 112/15 119/3	32/20 136/25
briefed [2] 77/9	4/10 4/16 5/2 5/5 5/23	30/1 31/14 33/13 34/4	149/22 150/10	Christmas [2] 44/12
112/19	5/24 6/5 6/8 6/25 7/7	34/13 47/7 64/24	causing [5] 82/20	74/4
briefly [1] 138/12	7/11 7/21 7/22 7/23	66/20 66/24 68/7	82/22 97/4 108/23	chronological [1]
bring [1] 131/24	8/1 8/2 8/17 8/20 10/4	68/11 71/20 71/21	112/9	1/23
bringing [1] 65/22	10/9 10/14 12/19	72/17 75/17 76/9 77/8	caveat [1] 117/19	circumstances [6]
broad [1] 40/1	12/21 17/6 17/7 17/9	77/19 79/12 80/7	central [1] 8/24	65/4 65/10 65/21
		81/20 83/1 83/19 84/1	centrally [1] 102/7	137/25 141/2 141/5

C	communication [2] 115/16 115/17	conducted [4] 18/11 28/22 50/2 72/17	83/15 150/6 152/2 152/4	142/4
civil [3] 8/9 24/23 25/3	communications [8] 114/11 118/6 118/18 118/22 125/4 125/6 125/8 125/11	conducting [2] 41/20 93/13	continues [1] 97/9	counter [32] 22/12 27/6 32/23 75/8
claim [1] 140/11	compare [1] 56/10	conference [10] 58/23 58/24 59/6 59/13 59/17 63/4 108/8 113/1 113/23 114/1	continuing [7] 71/18 77/21 78/5 81/5 102/17 104/2 105/17	101/19 101/23 123/7 123/25 124/2 124/15 125/21 127/18 129/9 130/10 130/12 131/1 132/4 135/1 136/8
claiming [1] 25/15	comparing [1] 148/23	confidence [1] 32/25	convenient [1] 50/13	136/15 136/19 136/22 136/23 136/23 136/24 142/10 142/13 142/17 142/21 142/23 143/3 143/4
Class [1] 6/18	comparison [1] 54/2	confident [1] 63/8	conversation [2] 34/15 92/19	counterfoils [2] 56/9 132/21
clear [16] 2/15 2/23 6/25 65/15 82/10 86/17 101/2 101/4 107/24 108/1 108/18 108/20 111/6 111/21 116/5 142/23	compiled [2] 74/18 75/21	confines [2] 40/14 40/25	conversations [1] 92/20	counters [4] 54/1 75/10 125/10 135/5
ClearDesk [2] 134/21 134/24	complained [1] 60/9	confirm [4] 22/2 23/3 23/15 114/10	coordinate [1] 15/20	country [1] 69/17
cleared [3] 97/21 100/9 100/10	complaining [6] 34/25 48/14 60/8 60/16 60/25 62/9	confirmation [2] 147/16 147/23	copied [3] 87/20 89/4 134/4	couple [7] 6/2 43/20 51/2 52/7 66/7 66/14 113/1
clearer [3] 99/23 114/5 115/4	complaint [1] 48/22	confirms [1] 125/5	copies [2] 26/12 98/1	course [8] 42/17 44/8 69/2 74/14 77/5 88/17 91/12 145/11
clearly [3] 39/9 116/18 126/19	complaints [3] 60/20 61/1 61/6	confusion [1] 85/9	copy [8] 2/6 5/17 5/18 103/7 110/7 110/8 110/23 112/13	court [40] 24/17 24/23 24/23 29/17 30/8 30/10 30/12 31/1 34/13 34/22 37/6 37/9 37/12 38/6 41/13 41/18 42/15 43/6 45/12 45/19 63/25 64/24 65/1 65/3 65/12 65/19 66/24 67/6 67/10 67/22 68/11 68/13 69/4 69/9 71/6 71/19 73/5 84/23 93/3 126/18
clerk [2] 8/13 55/25	complete [9] 2/1 3/10 5/6 22/3 22/8 23/3 23/19 25/25 130/2	conjunction [1] 138/19	Core [1] 119/10	cover [2] 126/16 149/2
client [1] 83/23	completed [4] 26/10 98/19 100/8 126/3	connected [1] 40/21	correct [5] 12/25 13/7 26/9 66/22 134/20	covered [1] 68/1
clone [1] 110/3	completely [5] 26/20 45/7 56/23 56/24 64/7	connection [1] 123/10	corrected [1] 140/20	covering [1] 149/12
cloned [1] 110/7	complicated [2] 114/3 118/24	connections [1] 16/9	correction [1] 142/2	created [6] 99/8 101/17 101/21 103/14 110/17 145/12
close [3] 11/15 13/8 15/5	complied [1] 94/1	consequence [3] 20/18 67/16 100/13	corrections [1] 112/21	creating [1] 93/23
closed [8] 12/17 13/18 78/13 79/24 80/1 80/12 106/7 135/1	comply [1] 65/6	consequences [4] 108/15 108/17 112/6 149/8	correctly [5] 8/13 13/1 53/6 140/7 148/11	criminal [4] 24/23 25/1 86/1 86/5
closing [2] 7/22 8/4	compromise [1] 115/10	consequent [1] 123/12	correspondence [1] 125/22	critical [1] 88/18
closure [2] 11/23 12/2	compromised [1] 117/9	consider [4] 13/24 109/1 130/23 145/13	corridor [1] 32/4	cross [4] 10/5 31/9 35/18 56/15
clue [2] 48/5 48/9	compromising [1] 117/17	consideration [2] 82/7 82/9	could [70] 14/14 14/17 14/22 14/23 15/23 16/17 16/20 17/3 19/22 22/21 27/17 39/21 41/4 41/7 41/10 42/9 45/5 48/19 53/10 55/8 55/16 55/18 56/1 56/16 66/6 68/21 72/21 74/14 75/12 77/8 80/13 80/19 84/6 88/18 89/12 91/8 98/7 102/14 106/10 107/21 112/13 112/14 121/9 121/12 121/20 122/6 122/19 123/11 123/14 123/25 126/24 132/24 134/18 135/8 135/16 135/21 136/4 136/9 136/17 136/20 137/11 140/5 148/13 148/15 148/22 149/19 149/21 150/8 150/9 150/17	cross-check [1] 10/5
code [5] 32/23 96/5 99/16 99/19 124/21	computer [3] 54/16 71/24 74/24	considered [2] 134/17 135/8	couldn't [12] 6/6 14/7 30/3 30/6 48/3 55/3 80/16 90/18 92/7 104/15 140/5 144/5	Crown [2] 114/17 114/24
Cohen [1] 17/12	computers [1] 54/18	considering [2] 36/5 145/14	counted [1] 4/23	culminated [1] 89/12
colleagues [4] 30/16 33/15 43/24 87/6	conceivable [1] 121/23	consistent [2] 36/21 56/12	countenance [1]	current [1] 86/4
column [1] 10/6	concentrate [1] 94/22	construct [1] 95/13		currently [1] 130/18
combination [1] 119/2	concept [2] 147/20 147/21	contact [1] 99/1		custody [1] 89/23
come [17] 7/21 17/6 29/9 35/19 38/13 44/13 44/14 49/12 63/11 64/3 64/14 67/12 69/15 81/2 85/24 120/3 122/9	concern [8] 29/7 51/3 66/2 69/22 78/16 82/1 84/16 85/18	contacted [2] 13/14 13/20		customer [9] 10/23 13/15 15/16 15/25 32/5 48/13 48/22 83/14 131/21
coming [3] 7/22 80/4 119/1	concerned [12] 26/1 64/2 66/22 67/7 82/3 84/24 85/4 88/11 89/10 93/13 94/7 116/24	contained [1] 102/9		cut [4] 8/14 71/15 99/5 130/20
commenced [3] 92/22 93/15 93/17	concerning [1] 93/19	containing [2] 75/12 102/10		
comment [4] 25/13 114/15 139/20 144/15	concerns [3] 59/23 60/21 64/14	contemporaneous [1] 41/22		
comments [4] 18/18 88/21 88/22 89/20	conclude [2] 89/15 148/15	contemporaneously [1] 84/12		
common [1] 77/19	conclusive [2] 137/5 137/10	contents [1] 40/17		
comms [1] 124/14	condensed [1] 114/13	context [5] 1/14 47/7 47/12 61/15 71/21		
communicate [4] 13/10 113/21 115/22 116/2	conduct [2] 82/18 92/20	contextualise [1] 134/1		
communicated [2] 116/9 116/12		continual [1] 60/13		

<p>D</p> <p>Darby [1] 108/9</p> <p>data [66] 1/19 1/24 2/12 3/4 3/8 3/11 7/6 7/14 19/22 20/10 21/21 22/7 23/12 25/18 26/1 26/2 26/20 26/22 28/12 38/9 38/10 41/10 42/3 42/6 44/16 52/21 53/15 54/2 54/7 58/8 67/13 72/20 73/21 73/23 77/6 84/24 85/6 92/21 93/14 93/23 102/11 103/24 105/1 106/9 106/16 106/20 108/22 110/17 111/4 111/11 112/1 112/4 112/5 112/7 112/21 119/20 124/19 125/9 135/22 137/13 137/18 140/4 141/18 142/7 144/3 149/6</p> <p>database [8] 71/24 95/13 102/6 102/8 102/9 103/7 103/9 108/23</p> <p>date [10] 1/23 3/14 21/9 21/13 21/13 21/22 28/10 28/13 87/11 97/25</p> <p>dated [2] 17/12 18/23</p> <p>dates [2] 25/9 135/14</p> <p>Dave [1] 32/4</p> <p>day [24] 5/1 5/12 9/3 9/19 14/16 16/21 17/4 21/4 28/11 28/13 55/22 56/2 56/4 100/3 102/25 104/2 106/24 130/20 131/18 132/21 134/16 136/5 148/25 151/10</p> <p>day/the [1] 148/25</p> <p>days [2] 21/1 22/11</p> <p>deal [5] 41/9 114/22 122/23 124/17 147/25</p> <p>dealing [6] 102/3 102/6 127/25 128/11 128/20 133/23</p> <p>dealt [7] 32/23 34/9 36/16 48/17 112/2 122/24 123/2</p> <p>December [1] 101/17</p> <p>decide [1] 14/13</p> <p>decided [1] 48/18</p> <p>deciding [1] 66/6</p> <p>decision [1] 116/16</p> <p>declaration [15] 4/22 4/25 5/6 5/8 5/19 6/16 6/20 119/21 119/23 121/1 121/14 121/15 121/19 121/20 121/24</p> <p>declarations [4] 8/15</p>	<p>9/15 10/12 10/13</p> <p>declare [9] 4/1 5/3 5/22 6/4 6/21 8/22 9/20 62/5 120/12</p> <p>declared [11] 4/9 4/24 5/15 5/20 6/10 7/9 9/1 11/4 51/21 52/10 53/7</p> <p>declaring [1] 10/15</p> <p>declined [3] 29/17 29/23 30/4</p> <p>deemed [1] 131/25</p> <p>deep [1] 114/9</p> <p>DEF [3] 100/16 100/18 100/19</p> <p>default [1] 100/19</p> <p>defect [2] 52/15 61/18</p> <p>defects [4] 80/21 91/7 94/14 94/19</p> <p>defend [1] 82/17</p> <p>defending [1] 82/11</p> <p>defensible [2] 111/7 111/21</p> <p>definitely [1] 35/14</p> <p>delay [2] 1/8 49/22</p> <p>delete [1] 125/21</p> <p>deleted [3] 95/6 95/12 103/25</p> <p>deleting [1] 111/11</p> <p>demonstrate [2] 51/20 52/9</p> <p>denomination [3] 5/20 6/12 6/15</p> <p>denominations [1] 120/3</p> <p>department [1] 74/5</p> <p>depend [1] 137/24</p> <p>depends [1] 48/17</p> <p>describe [3] 90/8 107/6 113/3</p> <p>described [1] 73/24</p> <p>describing [1] 86/3</p> <p>description [2] 71/22 116/20</p> <p>desperate [1] 14/18</p> <p>detail [7] 35/24 36/7 63/5 114/14 124/25 128/24 129/6</p> <p>detailed [1] 150/25</p> <p>details [5] 33/24 61/23 112/25 113/7 127/8</p> <p>determine [2] 82/19 116/10</p> <p>diagnostic [1] 75/9</p> <p>did [80] 6/22 9/25 13/2 13/24 15/4 15/16 16/25 18/1 20/22 21/19 22/25 24/12 27/2 28/5 28/6 29/1 29/22 34/5 37/10 39/7 40/16 43/12 43/20 44/18 46/25 57/24</p>	<p>62/6 63/22 64/10 64/11 64/13 65/19 66/20 67/2 68/20 69/15 69/19 70/3 72/16 72/25 76/9 76/14 79/8 80/1 80/6 80/11 80/13 82/2 83/24 89/25 93/3 93/22 101/2 101/20 101/25 104/8 104/17 105/22 106/12 107/4 109/23 111/21 117/17 124/13 124/13 136/4 140/22 142/13 143/21 143/22 144/4 146/1 146/4 146/15 146/15 147/2 147/11 149/18 149/25 150/3</p> <p>didn't [60] 7/15 8/14 12/14 14/7 14/20 15/1 16/7 20/9 21/11 21/13 21/14 22/23 23/1 24/20 30/20 31/10 43/17 44/17 44/23 46/24 52/5 54/16 54/20 55/14 58/20 70/12 72/5 73/15 73/23 74/1 74/8 75/5 75/6 75/15 76/13 81/2 83/2 83/8 83/10 83/21 90/23 91/1 104/14 117/14 117/20 121/25 127/20 131/11 131/13 132/19 137/21 145/4 145/5 146/7 146/25 148/6 149/9 149/24 149/25 150/13</p> <p>dies [1] 130/20</p> <p>difference [10] 10/16 11/2 23/11 23/12 23/15 24/24 51/21 52/10 79/23 132/23</p> <p>differences [1] 39/25</p> <p>different [20] 4/6 8/17 8/22 31/13 43/22 52/21 54/7 58/8 58/9 68/15 89/11 89/13 102/10 107/20 119/3 121/25 125/11 136/13 136/15 136/15</p> <p>difficult [2] 42/23 144/23</p> <p>Dilley [19] 38/19 39/22 43/10 43/12 46/18 46/19 59/5 71/14 73/13 77/1 134/3 144/8 144/12 144/16 144/19 145/2 145/9 145/23 146/9</p> <p>direct [5] 35/12 36/23 104/20 145/9 149/11</p> <p>directing [1] 130/1</p> <p>directly [3] 34/16 36/11 113/21</p>	<p>Director [1] 32/5</p> <p>disappearing [1] 133/15</p> <p>disclosable [2] 44/18 146/12</p> <p>disclose [3] 47/2 71/19 77/7</p> <p>disclosed [19] 42/18 43/18 45/23 45/24 46/6 46/21 49/20 49/23 64/8 71/4 71/7 72/13 73/9 73/14 73/15 73/20 77/2 144/10 146/23</p> <p>disclosing [2] 70/25 73/22</p> <p>disclosure [17] 42/25 43/8 43/15 63/19 70/22 71/6 72/7 73/23 74/1 77/11 93/25 143/5 143/7 144/7 144/15 145/22 146/10</p> <p>disclosures [1] 43/16</p> <p>disconnected [1] 124/3</p> <p>disconnection [1] 138/9</p> <p>discount [1] 142/9</p> <p>discover [1] 56/17</p> <p>discovered [4] 44/1 57/5 95/21 96/24</p> <p>discrepancies [14] 11/1 18/14 78/3 80/17 82/20 82/22 84/3 95/18 97/4 97/10 107/19 137/22 148/3 148/10</p> <p>discrepancy [18] 8/15 9/8 9/10 21/20 23/7 23/9 95/17 96/6 97/13 97/16 98/17 98/18 99/15 99/17 107/12 107/13 112/9 112/15</p> <p>discuss [3] 69/19 70/13 93/22</p> <p>discussed [8] 41/5 43/11 57/12 70/16 93/21 103/2 115/7 117/2</p> <p>discussing [5] 69/24 92/13 94/2 118/20 123/21</p> <p>discussion [8] 43/4 43/9 48/10 48/11 92/16 92/25 117/5 117/8</p> <p>discussions [1] 113/3</p> <p>disk [1] 124/8</p> <p>disks [1] 134/23</p> <p>disputes [1] 111/5</p>	<p>distinction [3] 24/22 39/8 72/19</p> <p>distribution [2] 70/6 92/9</p> <p>do [65] 2/11 5/1 5/9 12/15 14/23 15/17 16/7 16/17 17/1 19/8 27/11 31/22 31/24 33/23 37/21 42/6 44/8 47/15 49/24 52/5 55/25 57/14 59/9 63/13 68/2 70/1 73/4 78/4 83/22 84/20 87/24 91/25 92/12 93/2 93/3 102/14 105/6 105/8 105/16 106/4 112/19 116/17 121/4 121/10 123/23 124/6 125/12 127/9 128/3 135/12 136/4 136/11 137/19 137/23 139/19 140/1 141/10 142/1 142/1 142/3 143/9 144/13 147/22 149/13 150/12</p> <p>dockets [1] 56/9</p> <p>document [36] 1/15 2/5 2/5 2/7 2/12 2/20 7/3 19/2 24/1 28/23 29/8 29/9 35/21 36/2 36/8 39/1 42/22 58/10 63/11 64/9 70/1 70/5 71/16 76/3 84/21 88/23 92/1 92/11 92/12 103/11 124/17 133/21 144/18 146/8 146/20 147/1</p> <p>documented [1] 93/8</p> <p>documents [9] 45/15 61/17 62/16 71/19 79/10 113/6 136/1 145/12 145/20</p> <p>does [24] 3/10 3/13 4/21 5/6 11/25 12/12 25/22 46/11 60/3 61/2 66/11 77/10 88/14 89/17 98/4 98/20 101/12 101/14 103/21 107/12 128/18 138/8 138/9 138/15</p> <p>doesn't [8] 7/15 27/15 31/7 32/8 32/10 57/8 57/9 136/24</p> <p>doing [23] 16/22 27/13 30/25 33/18 41/23 51/25 54/2 55/21 57/23 57/25 62/5 83/24 85/1 93/4 93/9 94/8 103/10 116/23 116/24 117/20 131/25 133/5 138/24</p> <p>don't [73] 8/6 22/4 24/19 27/16 27/22 28/3 28/6 28/17 28/17</p>
--	--	---	--	--

D	43/23 45/19 51/10 63/7 90/18 122/12 126/15 129/25 133/8 137/4 143/10 dropped [2] 27/14 55/12 due [3] 51/20 52/9 125/3 Dunks [2] 37/17 38/3 during [7] 25/6 55/23 88/17 100/13 101/4 142/16 145/10 duty [3] 102/25 103/1 113/17	122/25 123/2 126/1 129/21 132/20 141/17 144/8 ended [2] 49/17 141/9 ends [1] 3/4 engaged [1] 118/16 engineer [3] 138/12 138/24 139/10 enormous [1] 74/23 enough [3] 51/12 64/2 149/25 enquiry [1] 89/14 entered [1] 98/20 entire [3] 55/15 63/23 144/25 entirely [1] 15/21 entries [2] 21/2 104/10 entry [10] 3/17 3/24 5/22 8/3 8/4 11/13 16/14 100/4 106/12 110/7 equally [1] 146/25 equipment [2] 127/25 128/1 equivalence [1] 47/23 Err [1] 123/18 error [21] 13/7 14/8 15/9 46/21 47/10 47/21 47/25 48/12 49/16 52/15 61/18 80/6 81/4 111/9 131/25 133/4 147/4 150/9 150/12 150/17 150/17 errors [10] 46/7 48/15 60/12 80/20 88/17 91/7 94/14 94/19 150/5 150/6 escalate [1] 96/19 escalated [1] 97/7 essence [1] 95/11 essentially [12] 8/3 11/12 11/15 18/8 54/3 54/4 67/9 77/25 97/3 103/4 107/6 115/15 establish [1] 9/25 established [1] 10/1 estate [2] 127/5 134/22 estate-wide [1] 134/22 even [7] 85/7 93/15 123/10 132/18 139/4 147/2 150/17 event [7] 11/15 42/16 43/19 45/9 71/3 72/24 146/17 events [4] 36/4 43/6 72/2 114/3 eventually [2] 109/7 142/22	ever [25] 12/13 31/20 33/23 39/12 42/2 70/16 77/10 77/12 83/12 85/12 89/25 93/8 93/21 93/22 100/23 109/20 115/25 118/12 128/6 129/6 132/1 144/12 145/8 145/15 150/16 every [8] 21/1 21/4 21/5 81/8 100/20 101/15 135/1 135/7 everybody [2] 44/11 114/4 everything [11] 13/1 29/2 29/5 31/12 44/11 47/3 53/18 53/24 70/18 72/4 130/20 everywhere [3] 19/20 135/4 135/7 evidence [76] 8/8 10/21 13/7 17/8 25/20 29/10 29/12 29/16 29/17 29/24 30/5 30/8 30/9 30/11 30/12 31/1 32/4 32/20 33/22 35/5 37/9 37/12 38/4 40/8 40/13 45/17 49/17 49/25 50/1 63/19 63/19 63/24 63/25 65/11 65/19 66/3 66/23 68/10 68/13 68/20 69/4 69/16 70/14 70/23 70/25 76/6 76/6 76/21 78/1 82/25 84/23 85/10 85/11 85/13 86/25 92/8 93/12 93/19 93/20 101/19 103/15 119/19 121/11 126/25 134/12 137/5 137/8 139/4 139/5 140/2 147/17 147/22 148/1 150/4 150/15 151/1 evident [1] 71/6 exacted [1] 72/25 exactly [7] 2/7 2/20 16/7 66/16 105/22 107/4 119/2 examination [4] 27/10 93/5 93/10 137/3 examined [2] 26/10 129/6 examining [2] 126/25 134/13 example [13] 9/2 45/16 52/24 55/22 60/10 61/13 62/23 71/23 124/16 126/8 129/17 132/14 149/5 examples [1] 101/25 Excel [6] 2/6 2/7 2/21 10/7 54/8 103/16	except [4] 8/13 35/9 37/25 57/10 exception [1] 116/14 Exceptions [1] 22/12 exercise [4] 40/21 52/13 54/3 54/4 exist [3] 43/20 77/6 131/21 existed [5] 20/24 44/4 44/8 71/3 75/10 existence [4] 71/1 74/16 75/14 75/23 expand [1] 3/7 expanded [2] 2/25 7/14 expect [3] 5/11 15/16 52/4 expected [4] 33/16 69/10 121/17 132/15 expecting [5] 50/6 50/10 64/4 65/8 126/21 experience [1] 82/17 experienced [3] 32/21 68/6 133/11 experiences [1] 81/23 expert [10] 38/24 39/6 39/11 40/9 47/3 58/19 67/23 69/2 69/21 70/18 expertise [2] 54/16 54/18 experts [1] 38/11 explain [15] 6/8 8/20 20/8 22/5 22/17 100/25 107/15 114/2 116/18 118/25 121/12 138/17 139/15 139/23 149/3 explained [3] 38/22 39/13 119/23 explanation [9] 39/17 121/5 123/8 125/1 139/9 139/9 142/9 144/7 145/18 explanations [5] 94/19 121/8 139/11 139/14 150/5 explicitly [2] 46/4 69/24 explored [1] 63/5 expressed [1] 82/24 expressing [1] 84/12 extend [1] 54/20 extensive [1] 68/2 extent [3] 49/3 54/22 63/4 extra [4] 109/1 109/5 124/25 129/11 extract [17] 1/18 4/3 20/15 20/18 21/12 22/6 25/19 25/25 38/10 53/21 73/2
E	each [7] 5/1 6/15 14/16 25/23 26/19 102/11 134/16 earlier [12] 34/9 63/13 71/11 73/10 96/11 96/19 119/19 121/14 122/1 122/4 134/22 135/25 early [3] 45/21 67/7 136/12 easier [2] 51/15 137/15 easily [3] 103/11 112/23 135/22 effect [8] 105/23 107/5 120/2 121/16 128/23 129/22 133/16 134/4 effectively [3] 125/15 138/23 142/4 either [7] 6/20 14/9 32/4 41/18 54/25 130/25 148/20 electronic [2] 26/3 26/11 Elliott [5] 32/6 38/21 46/15 87/17 89/4 else [12] 4/12 18/6 19/20 29/6 31/12 43/25 68/25 69/13 72/4 90/3 106/23 141/11 email [20] 43/13 70/7 71/8 71/11 71/14 73/12 73/25 74/2 74/3 87/10 89/3 92/6 92/9 92/9 99/4 104/5 113/11 113/16 114/22 134/2 emblematic [1] 79/15 emerged [1] 48/8 employees [1] 69/3 end [25] 5/1 9/19 16/20 26/5 30/25 41/20 52/24 56/2 56/4 57/11 64/3 64/15 65/18 74/24 88/20 95/7 119/7 120/13	entirely [1] 15/21 entries [2] 21/2 104/10 entry [10] 3/17 3/24 5/22 8/3 8/4 11/13 16/14 100/4 106/12 110/7 equally [1] 146/25 equipment [2] 127/25 128/1 equivalence [1] 47/23 Err [1] 123/18 error [21] 13/7 14/8 15/9 46/21 47/10 47/21 47/25 48/12 49/16 52/15 61/18 80/6 81/4 111/9 131/25 133/4 147/4 150/9 150/12 150/17 150/17 errors [10] 46/7 48/15 60/12 80/20 88/17 91/7 94/14 94/19 150/5 150/6 escalate [1] 96/19 escalated [1] 97/7 essence [1] 95/11 essentially [12] 8/3 11/12 11/15 18/8 54/3 54/4 67/9 77/25 97/3 103/4 107/6 115/15 establish [1] 9/25 established [1] 10/1 estate [2] 127/5 134/22 estate-wide [1] 134/22 even [7] 85/7 93/15 123/10 132/18 139/4 147/2 150/17 event [7] 11/15 42/16 43/19 45/9 71/3 72/24 146/17 events [4] 36/4 43/6 72/2 114/3 eventually [2] 109/7 142/22	ever [25] 12/13 31/20 33/23 39/12 42/2 70/16 77/10 77/12 83/12 85/12 89/25 93/8 93/21 93/22 100/23 109/20 115/25 118/12 128/6 129/6 132/1 144/12 145/8 145/15 150/16 every [8] 21/1 21/4 21/5 81/8 100/20 101/15 135/1 135/7 everybody [2] 44/11 114/4 everything [11] 13/1 29/2 29/5 31/12 44/11 47/3 53/18 53/24 70/18 72/4 130/20 everywhere [3] 19/20 135/4 135/7 evidence [76] 8/8 10/21 13/7 17/8 25/20 29/10 29/12 29/16 29/17 29/24 30/5 30/8 30/9 30/11 30/12 31/1 32/4 32/20 33/22 35/5 37/9 37/12 38/4 40/8 40/13 45/17 49/17 49/25 50/1 63/19 63/19 63/24 63/25 65/11 65/19 66/3 66/23 68/10 68/13 68/20 69/4 69/16 70/14 70/23 70/25 76/6 76/6 76/21 78/1 82/25 84/23 85/10 85/11 85/13 86/25 92/8 93/12 93/19 93/20 101/19 103/15 119/19 121/11 126/25 134/12 137/5 137/8 139/4 139/5 140/2 147/17 147/22 148/1 150/4 150/15 151/1 evident [1] 71/6 exacted [1] 72/25 exactly [7] 2/7 2/20 16/7 66/16 105/22 107/4 119/2 examination [4] 27/10 93/5 93/10 137/3 examined [2] 26/10 129/6 examining [2] 126/25 134/13 example [13] 9/2 45/16 52/24 55/22 60/10 61/13 62/23 71/23 124/16 126/8 129/17 132/14 149/5 examples [1] 101/25 Excel [6] 2/6 2/7 2/21 10/7 54/8 103/16	except [4] 8/13 35/9 37/25 57/10 exception [1] 116/14 Exceptions [1] 22/12 exercise [4] 40/21 52/13 54/3 54/4 exist [3] 43/20 77/6 131/21 existed [5] 20/24 44/4 44/8 71/3 75/10 existence [4] 71/1 74/16 75/14 75/23 expand [1] 3/7 expanded [2] 2/25 7/14 expect [3] 5/11 15/16 52/4 expected [4] 33/16 69/10 121/17 132/15 expecting [5] 50/6 50/10 64/4 65/8 126/21 experience [1] 82/17 experienced [3] 32/21 68/6 133/11 experiences [1] 81/23 expert [10] 38/24 39/6 39/11 40/9 47/3 58/19 67/23 69/2 69/21 70/18 expertise [2] 54/16 54/18 experts [1] 38/11 explain [15] 6/8 8/20 20/8 22/5 22/17 100/25 107/15 114/2 116/18 118/25 121/12 138/17 139/15 139/23 149/3 explained [3] 38/22 39/13 119/23 explanation [9] 39/17 121/5 123/8 125/1 139/9 139/9 142/9 144/7 145/18 explanations [5] 94/19 121/8 139/11 139/14 150/5 explicitly [2] 46/4 69/24 explored [1] 63/5 expressed [1] 82/24 expressing [1] 84/12 extend [1] 54/20 extensive [1] 68/2 extent [3] 49/3 54/22 63/4 extra [4] 109/1 109/5 124/25 129/11 extract [17] 1/18 4/3 20/15 20/18 21/12 22/6 25/19 25/25 38/10 53/21 73/2

E	97/18 98/1 100/9 108/10 122/11 122/17 136/12 136/20 143/22	19/12 19/14 24/9 36/10 39/4 48/8 58/1 64/12 64/17 64/25 68/10 78/4 78/17 94/20 100/3 114/12 116/7 117/24 130/7 130/16 140/17	four years [2] 60/7 60/16 four-week [2] 98/6 103/22 fourth [2] 17/24 19/9 Fourthly [1] 95/17 FP [1] 52/3 frame [1] 34/19 Fraser's [1] 94/16 fraud [4] 72/10 72/15 72/23 72/25 freeze [3] 131/8 131/17 133/12 freezes [3] 130/21 137/12 137/14 froing [1] 79/22 front [2] 139/1 139/7 frustrating [2] 78/14 81/15 FSC [1] 114/16 FUJ00081875 [1] 96/1 FUJ00146165 [1] 7/24 FUJ00152295 [1] 18/16 FUJ00152299 [2] 35/23 63/12 FUJ00152300 [1] 87/9 Fujitsu [30] 2/6 2/10 2/21 13/2 15/2 29/13 38/20 39/24 40/7 43/14 46/20 48/1 48/11 67/6 67/12 69/3 69/14 70/24 71/25 77/16 77/17 86/14 88/14 88/15 88/16 112/1 115/21 116/8 117/18 133/24 Fujitsu's [1] 15/25 fulfil [1] 68/3 full [16] 19/11 19/16 19/24 20/14 28/11 52/1 52/5 72/11 72/12 73/8 73/19 122/5 122/10 135/23 143/10 143/12 fully [1] 100/20 function [4] 29/14 37/18 134/15 134/21 functions [1] 27/6 fundamental [6] 72/9 73/11 84/22 92/21 93/14 147/24 fundamentally [4] 147/11 147/13 148/5 148/22 further [10] 3/19 16/12 21/25 23/22 23/23 28/7 65/20 97/14 112/23 130/22 future [10] 68/7 74/19 75/18 77/8	86/19 88/19 106/5 109/3 109/6 109/21
extract... [6] 122/10 135/24 143/8 144/4 144/6 145/2 extracted [3] 19/22 21/12 72/11 extraction [1] 27/4 extracts [3] 20/1 103/5 103/6 extremely [5] 30/13 34/15 123/4 123/20 141/22	fed [1] 85/3 feel [3] 49/24 64/2 79/18 feeling [2] 75/7 139/22 felt [22] 12/1 12/23 13/12 30/18 31/16 43/2 43/5 44/10 64/1 64/6 65/13 65/24 67/20 70/8 76/25 85/3 111/14 112/17 114/4 126/19 126/22 142/1 few [7] 21/1 33/19 66/5 66/12 115/2 141/24 147/9 field [1] 12/13 fifth [1] 17/24 figure [8] 4/6 5/4 5/11 8/24 10/4 10/9 97/21 120/19 figures [21] 9/5 9/11 10/17 14/15 25/15 26/3 26/10 26/15 26/16 26/17 26/18 33/21 52/19 67/2 98/20 100/17 100/18 100/24 101/8 103/18 103/21 file [4] 22/21 27/19 44/3 76/14 files [16] 19/21 22/23 43/25 55/1 74/6 74/13 74/18 74/20 74/21 74/24 75/8 75/9 75/12 75/21 75/23 101/23 filing [1] 90/13 filter [1] 147/16 filtered [1] 73/23 final [11] 7/4 7/7 7/19 27/18 58/5 98/2 107/22 107/23 120/18 143/6 147/10 finalised [1] 121/2 finally [2] 147/9 148/22 financial [4] 13/4 78/24 111/12 112/5 find [17] 13/17 14/7 15/10 16/23 21/14 30/14 41/10 45/5 73/17 80/16 84/4 101/25 102/14 137/7 137/15 149/19 150/14 finding [1] 45/1 findings [3] 13/9 15/6 16/10 Fine [1] 50/17 finished [1] 131/3 fire [1] 1/9 first [28] 2/4 3/6 3/20 3/21 6/17 11/12 19/6	firstly [2] 95/3 110/14 five [2] 50/2 66/13 five-hour [1] 66/13 fixed [1] 49/7 flag [1] 115/11 flags [1] 86/9 flow [1] 8/18 flowchart [6] 128/15 128/17 129/2 129/5 131/23 132/2 focus [1] 138/7 follow [5] 10/24 16/16 16/17 76/2 94/8 follow-up [1] 76/2 followed [3] 70/12 106/23 109/19 following [13] 12/25 32/18 43/22 51/8 95/2 95/15 100/3 114/1 126/9 128/9 134/11 137/14 151/10 foot [7] 8/2 38/16 51/5 59/23 87/10 105/16 113/10 forgot [1] 8/14 forgotten [4] 61/19 64/8 70/5 90/1 formal [2] 44/2 92/15 formality [2] 36/20 65/22 formally [2] 23/18 93/8 format [3] 2/7 2/8 2/21 formed [1] 19/25 forms [1] 8/7 forth [3] 133/23 136/1 139/13 Fortunately [1] 68/2 forward [7] 26/14 26/15 26/16 26/17 94/5 119/25 139/15 forwards [3] 17/7 59/21 110/5 found [22] 13/6 13/19 20/3 28/24 29/6 39/16 43/19 44/4 52/5 67/22 69/1 71/1 101/10 102/13 104/23 106/16 106/20 137/15 149/6 149/23 150/8 150/16 four [17] 59/14 60/7 60/16 60/24 61/1 61/3 61/4 61/6 61/10 62/8 63/16 63/22 64/13 92/13 94/5 98/6 103/22	G gain [6] 53/8 101/3 101/11 101/13 101/16 108/18 gaps [2] 53/23 55/10 Gareth [13] 18/4 25/4 27/17 28/3 33/20 42/8 51/7 58/18 68/17 69/10 113/2 113/4 115/5 Gareth Jenkins [3] 25/4 33/20 68/17 gateway [4] 125/3 125/9 125/10 125/14 gave [11] 39/17 40/13 41/14 41/14 62/22 62/22 69/4 81/8 145/1 147/22 150/4 general [4] 47/14 62/22 123/24 139/22 generally [3] 62/19 85/16 116/8 generated [2] 27/7 74/25 get [27] 10/23 14/1 14/22 15/14 16/16 22/14 25/2 62/16 64/7 67/14 78/6 82/12 83/3 108/22 111/14 117/13 120/13 124/21 125/20 127/21 130/22 131/15 131/22 140/9 141/4 141/16 149/9 gets [1] 118/2 getting [3] 56/6 65/3 79/1 give [29] 7/11 8/8 11/18 14/2 29/15 29/17 29/24 30/5 30/8 30/9 30/11 32/4 32/20 33/9 37/9 37/11 48/5 48/9 49/25 63/24 63/25 68/12 70/14 76/21 86/25 106/25 121/20 123/8 148/19 given [15] 11/19 11/21 12/3 13/11 31/20 70/14 72/1 77/12 94/20 96/5 135/25 139/4 139/5 149/16 151/1 given' [1] 13/19 giving [14] 17/7 30/12 30/25 33/22 40/8 41/21 49/17 65/19 66/10 69/16 84/23 85/10 93/11 93/19 glad [1] 64/11 go [43] 3/3 3/6 4/15 6/14 13/3 16/15 16/18	
F				
face [1] 141/2 facing [1] 48/11 fact [17] 38/24 39/5 39/12 40/9 67/25 69/11 69/22 78/10 78/17 83/9 85/10 91/23 93/19 103/8 117/20 134/13 140/3 facts [1] 40/25 factual [1] 49/25 FAD [1] 96/5 fail [1] 131/15 failed [7] 122/13 122/17 130/11 131/22 132/16 136/19 140/9 failing [1] 122/23 fails [2] 129/9 131/2 failure [23] 96/18 123/15 124/8 126/9 127/20 127/25 128/1 128/2 128/9 128/11 128/12 128/16 128/22 129/24 130/3 130/4 130/6 131/8 131/12 133/16 136/16 140/4 140/17 failures [3] 127/5 127/14 127/16 fair [8] 44/15 44/22 63/3 90/10 90/11 121/3 125/16 139/20 fairly [3] 58/3 82/10 93/4 false [3] 95/17 112/10 112/15 familiar [5] 57/16 58/4 58/13 147/19 147/21 familiarity [1] 56/8 far [7] 22/3 41/6 67/6 90/25 96/21 97/2 105/20 fault [5] 23/20 27/3 53/9 57/4 57/6 faults [1] 57/1 February [22] 32/24 36/17 39/1 40/15 41/1 41/5 50/3 66/4 81/9 89/1 95/21 95/25 96/9				

G	73/16 76/11 83/2 126/19 132/20 140/17 half [2] 66/15 76/15 hand [1] 58/2 handled [6] 8/12 30/18 49/14 65/7 68/5 127/22 handling [1] 9/4 hands [1] 68/21 happen [10] 49/5 68/4 79/8 80/11 80/13 80/14 124/13 124/13 132/2 144/4 happened [15] 31/12 31/23 41/1 45/17 55/13 55/20 100/13 114/13 124/11 124/22 125/1 135/6 135/16 135/16 140/13 happening [13] 14/25 21/4 37/13 38/7 48/6 57/10 61/20 62/24 90/4 115/25 136/7 137/8 141/7 happens [3] 27/3 76/9 147/16 happy [2] 31/18 65/6 hard [3] 124/8 129/17 149/24 hardware [10] 11/5 126/9 126/14 127/5 127/13 127/15 128/21 130/4 130/5 140/4 has [34] 2/12 9/21 21/20 29/19 35/7 35/8 52/21 53/2 53/6 72/13 73/8 77/9 77/12 88/20 96/5 97/6 97/7 97/12 97/16 98/1 99/8 99/8 99/15 105/1 106/1 106/3 114/16 120/18 125/3 141/5 141/6 141/7 148/25 150/16 hasn't [1] 52/1 hate [1] 115/9 have [219] haven't [7] 57/5 90/3 129/5 130/14 137/7 140/2 143/25 having [26] 13/6 31/10 32/3 34/10 37/15 49/20 58/16 61/21 64/3 64/14 65/1 79/5 83/4 84/6 85/2 92/7 98/5 99/16 100/1 103/25 108/1 109/24 118/12 122/17 122/24 123/2 he [51] 13/25 14/18 14/23 15/13 24/3 24/5 24/17 24/25 27/18 32/12 32/16 32/19 32/20 32/23 32/24 33/1 33/22 34/15	34/18 35/17 36/18 37/19 37/22 42/9 44/24 64/23 69/12 70/6 70/14 70/17 70/18 72/5 83/4 92/23 93/2 93/3 93/3 93/6 93/9 93/11 93/16 94/11 99/2 102/23 103/1 115/15 117/25 133/9 136/25 142/13 144/16 he'd [7] 73/17 88/9 93/5 94/3 133/11 144/19 144/21 He'll [1] 104/5 he's [3] 27/21 83/5 134/8 head [2] 30/2 90/9 headed [2] 127/25 128/10 heading [1] 99/19 headings [1] 63/16 hear [6] 1/5 50/22 89/25 91/18 108/13 121/9 heard [4] 29/10 39/10 39/12 73/18 hearing [1] 151/9 held [4] 6/7 74/7 91/7 102/7 Helen [1] 113/17 help [18] 13/17 14/19 14/22 14/23 16/18 30/3 33/21 45/5 61/14 71/20 82/23 83/3 84/8 87/3 101/24 113/8 124/17 149/17 helpdesk [13] 15/6 15/11 16/4 49/14 50/1 63/20 77/18 78/10 78/18 80/3 96/19 96/22 97/1 Helpdesks [1] 78/8 helpful [5] 15/22 16/8 31/25 94/19 116/25 helpfully [1] 72/1 helping [1] 15/3 helps [2] 35/22 66/9 her [6] 15/20 15/23 16/16 30/2 37/16 88/20 here [13] 6/6 31/1 42/7 62/8 69/20 79/1 79/2 98/24 111/12 115/9 126/23 133/25 139/3 Hi [1] 114/8 high [5] 43/6 115/7 117/3 117/5 117/8 higher [4] 34/18 35/1 97/22 118/19 highlight [1] 89/17 highlighted [3] 56/21 77/19 89/21	highlighting [1] 5/3 him [33] 14/22 14/23 15/7 16/18 33/21 33/25 35/1 35/2 35/2 35/20 36/23 37/17 37/21 45/5 58/20 69/19 69/23 69/25 70/1 70/3 70/8 83/3 92/11 92/12 92/14 92/20 93/21 93/22 94/2 94/10 103/3 144/21 149/11 himself [1] 34/7 hinder [1] 71/20 his [18] 13/13 14/8 32/11 32/17 33/21 35/9 44/24 47/11 70/15 70/15 70/16 77/21 83/6 94/11 115/16 115/16 149/10 149/18 hit [1] 48/25 Hodge [1] 119/10 hold [4] 10/11 10/15 27/24 74/14 holding [5] 4/22 5/12 8/23 52/23 53/6 holdings [7] 51/21 51/22 52/10 52/11 52/13 52/18 53/7 homework [1] 1/12 honesty [1] 32/25 honoured [1] 50/3 hope [3] 51/12 65/25 67/18 hoped [2] 57/15 86/18 hopefully [1] 115/3 hoping [1] 13/16 Horizon [33] 25/15 33/12 52/15 53/14 57/17 60/17 60/25 61/7 62/10 62/20 63/4 66/23 73/21 77/22 78/10 78/18 82/18 83/8 84/25 85/15 95/4 96/22 97/1 115/8 115/23 117/7 127/22 128/5 147/11 147/24 150/9 150/9 150/13 horrible [2] 7/2 58/3 horribly [1] 62/1 hour [2] 50/2 66/13 hours [5] 12/11 12/11 66/5 66/12 151/2 housekeeping [1] 98/21 housekeeping/local [1] 98/21 how [33] 5/21 6/14 9/25 12/14 29/2 35/4 46/9 48/1 58/13 62/13 62/14 62/15 65/7	65/20 68/22 83/20 83/25 89/18 90/15 93/1 101/25 105/22 106/4 107/4 107/9 107/15 115/21 116/1 116/11 116/18 127/22 128/19 139/22 however [6] 13/11 27/4 27/11 97/20 101/10 105/9 HSD [1] 104/5 HSH [5] 11/22 12/6 13/9 72/1 99/2 human [1] 141/3 hundreds [2] 9/20 61/9 hyperlink [2] 103/5 103/14 hypotheses [1] 139/14
H	had [236] hadn't [17] 15/2 20/23 28/16 41/4 41/6 42/17 43/17 45/16 45/19 69/11 73/13			

I	128/5 128/5 147/25 149/11 150/7	I personally [1] 43/15	127/6 127/7 132/15	7/22 11/9 11/11 16/14
I could [18] 14/14 14/17 41/4 41/7 41/10 45/5 55/16 84/6 91/8 102/14 121/12 122/6 126/24 135/21 136/17 148/13 148/15 149/19	I hadn't [4] 20/23 41/4 41/6 73/13	I probably [2] 28/6 103/2	139/20 141/13 141/21 146/23 147/10 149/16	18/8 22/24 29/19 30/13 31/21 32/16 35/16 37/4 37/5 37/24 41/15 41/17 43/9 43/11 51/19 51/25 57/23 57/25 66/15 69/9 72/18 72/18 81/6 86/10 91/3 93/7 94/21 96/22 109/16 117/11 122/8 123/1 129/5 129/6 132/1 133/5 134/6 134/20 135/13 138/23 147/21
I couldn't [3] 6/6 55/3 104/15	I have [15] 24/20 33/10 34/1 51/15 60/5 88/5 92/17 97/24 115/9 129/23 135/14 139/7 143/6 143/23 149/8	I produced [1] 70/5	I thought [15] 16/10 35/4 46/23 47/2 54/12 64/4 74/9 75/16 85/21 86/10 104/9 146/15 146/24 147/6 147/7	I've [23] 7/12 10/22 22/22 31/24 37/13 39/9 48/23 51/9 70/4 70/4 78/24 94/2 109/14 109/16 114/9 115/2 121/11 138/25 149/6 149/7 149/7 149/20 150/8
I did [14] 13/24 29/1 34/5 40/16 64/11 66/20 76/9 76/14 136/4 143/22 146/4 146/15 149/25 150/3	I haven't [3] 129/5 137/7 143/25	I put [1] 77/14	I took [3] 66/4 78/1 79/10	ibrahim [4] 99/1 104/3 104/19 104/22
I didn't [18] 15/1 23/1 24/20 30/20 31/10 44/23 46/24 52/5 73/15 74/8 75/6 75/15 76/13 83/8 117/20 146/25 149/24 149/25	I hope [1] 51/12	I quoted [1] 144/16	I totally [2] 89/18 142/9	ID [7] 8/16 8/17 9/1 121/21 121/25 122/3 142/11
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I hoped [2] 57/15 86/18	I read [1] 35/5	I tried [2] 114/5 115/5	idea [9] 24/20 27/13 47/4 51/16 60/5 78/24 110/25 140/21 141/7
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I imagine [1] 145/10	I realised [1] 50/8	I understood [1] 87/24	identified [7] 26/21 49/11 53/20 63/23 95/19 106/15 116/8 identifies [1] 107/15 identify [1] 107/9 identifying [6] 112/22 128/8 128/13 141/8 141/10 141/11
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I informed [1] 34/14	I recalled [1] 34/13	I understood [1] 87/24	IDs [1] 8/23
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I intend [1] 118/1	I recalled [1] 34/13	I understood [1] 87/24	ie [6] 9/19 38/3 46/16 101/3 116/14 118/18
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I just [11] 2/11 30/18 31/16 36/8 84/2 85/3 86/12 111/13 112/17 117/19 135/17	I recalled [1] 34/13	I understood [1] 87/24	ie at [1] 9/19
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I kept [1] 42/8	I recalled [1] 34/13	I understood [1] 87/24	ie communications [1] 118/18
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I knew [9] 15/18 24/24 24/25 37/4 37/14 37/19 53/21 72/20 147/25	I recalled [1] 34/13	I understood [1] 87/24	ie make [1] 101/3
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I know [12] 2/23 31/14 32/16 39/10 42/6 43/12 72/9 72/14 112/25 113/2 113/5 144/2	I recalled [1] 34/13	I understood [1] 87/24	ie Mr Dunks [1] 38/3
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I like [1] 139/23	I recalled [1] 34/13	I understood [1] 87/24	ie the [1] 46/16
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I looked [4] 54/25 106/14 138/18 143/18	I recalled [1] 34/13	I understood [1] 87/24	ie you [1] 116/14
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I made [2] 42/10 72/19	I recalled [1] 34/13	I understood [1] 87/24	if [179]
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I may [3] 37/10 94/22 122/7	I recalled [1] 34/13	I understood [1] 87/24	ignored [3] 27/4 27/5 86/20
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I mean [25] 14/13 15/19 19/17 28/6 28/17 37/19 41/2 42/5 43/1 49/3 53/17 56/2 63/6 68/23 85/1 92/23 105/12 121/10 127/18 128/19 130/3 132/14 135/12 146/21 148/7	I recalled [1] 34/13	I understood [1] 87/24	imagined [1] 57/14
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I meant [1] 73/6	I recalled [1] 34/13	I understood [1] 87/24	IMD [1] 104/5
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I mention [1] 146/15	I recalled [1] 34/13	I understood [1] 87/24	immediate [1] 17/4
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I mentioned [1] 35/15	I recalled [1] 34/13	I understood [1] 87/24	impact [6] 86/18 106/1 106/3 108/11 114/10 123/11
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I might [1] 41/11	I recalled [1] 34/13	I understood [1] 87/24	impacted [1] 119/4
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I must [1] 89/8	I recalled [1] 34/13	I understood [1] 87/24	impacting [3] 103/9 112/24 115/23
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I need [1] 2/23	I recalled [1] 34/13	I understood [1] 87/24	imperfectly [2] 140/19 140/20
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I needed [1] 42/12	I recalled [1] 34/13	I understood [1] 87/24	impertinently [1]
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I never [1] 76/2	I recalled [1] 34/13	I understood [1] 87/24	
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I now [2] 10/2 29/3	I recalled [1] 34/13	I understood [1] 87/24	
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I obviously [3] 28/25 64/1 64/10	I recalled [1] 34/13	I understood [1] 87/24	
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I only [2] 66/5 66/7	I recalled [1] 34/13	I understood [1] 87/24	
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I ought [1] 64/4	I recalled [1] 34/13	I understood [1] 87/24	
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10	I outlined [1] 107/7	I recalled [1] 34/13	I understood [1] 87/24	
I don't [42] 22/4 27/16 27/22 28/3 28/6 28/17 31/13 31/20 31/22 35/9 37/15 37/20 37/24 38/7 39/11 45/25 51/24 57/22 57/24 59/19 60/3 62/18 69/24 70/7 70/16 79/22 85/12 85/18 93/16 94/3 94/7 96/21 111/8 115/10 117/11 117/19 121/10 128/23 129/6 129/23 135/21 147/6	I perhaps [2] 126/19 146/21	I recalled [1] 34/13	I understood [1] 87/24	
I do [7] 19/8 33/23 68/2 93/2 105/8 121/4 121/10		I recalled [1] 34/13	I understood [1] 87/24	

L	118/20 149/2	146/17 147/4	Love [1] 113/17	89/20 151/1
last... [2] 106/12 140/6	levels [2] 34/18 35/1	London [3] 59/8 59/9 59/11	Lower [1] 114/24	mapping [1] 51/16
lastly [1] 95/21	liaise [1] 37/11	long [4] 12/14 48/1 83/20 143/7	LS [1] 101/11	mappings [1] 58/8
late [2] 105/4 105/4	light [5] 28/7 35/8 56/24 94/15 115/13	longer [4] 20/24 22/14 125/16 125/17	lunch [3] 91/9 91/25 92/10	March [2] 108/6 110/5
later [9] 6/2 35/25 36/8 66/16 89/1 100/2 104/2 124/5 132/25	like [21] 15/3 31/7 33/1 42/2 44/10 53/18 62/1 74/17 74/25 86/11 110/25 111/4 111/11 120/16 120/24 126/16 127/7 127/13 127/16 139/23 146/16	look [48] 2/24 7/4 7/10 8/2 8/2 8/15 10/16 12/20 16/21 17/23 18/3 18/8 18/16 19/9 19/23 23/25 33/4 35/21 35/24 36/7 36/9 42/21 51/4 51/19 55/2 63/10 63/11 64/18 66/2 70/22 72/5 83/16 87/9 91/6 91/23 95/24 110/1 112/13 113/8 114/12 122/19 124/24 127/22 133/6 133/20 138/3 143/22 149/24	M	Marine [15] 18/18 19/18 19/20 24/11 43/23 45/19 51/10 63/7 90/18 122/12 126/15 129/25 133/8 137/4 143/10
launched [2] 67/11 85/7	likely [9] 29/3 35/17 39/20 39/22 48/7 49/5 80/18 104/21 122/2	looked [23] 4/4 13/9 18/21 20/25 21/6 26/25 33/3 44/17 54/25 63/13 64/17 66/7 66/13 79/17 84/2 92/8 104/13 106/14 106/17 118/8 138/18 143/18 147/25	machine [2] 15/12 16/5	Marine Drive [11] 18/18 19/18 19/20 43/23 63/7 90/18 122/12 126/15 129/25 133/8 143/10
Laura [1] 108/9	limited [2] 33/25 50/1	looking [35] 1/16 7/19 7/25 17/9 19/11 42/5 43/24 44/16 44/19 45/4 49/4 49/24 52/8 52/20 58/2 58/5 61/15 93/6 99/23 101/23 110/4 116/18 119/19 135/13 135/15 136/5 136/19 139/25 142/6 144/3 145/21 148/1 149/20 150/4 150/5	made [30] 1/21 10/13 28/14 34/11 41/17 42/10 43/23 51/19 53/22 61/6 65/14 70/24 72/19 73/21 74/19 79/22 83/3 88/17 94/4 96/24 99/22 101/4 111/4 112/1 115/2 116/16 121/19 126/25 127/17 132/6	mark [3] 78/24 108/9 108/13
lawyers [3] 58/25 133/10 133/22	Limited's [1] 26/5	looks [2] 103/3 149/21	maintained [1] 75/11	Martin [1] 52/2
lay [2] 58/6 68/21	limits [1] 89/17	losing [2] 114/14 124/7	major [5] 60/10 61/12 61/16 62/10 70/24	match [3] 107/12 108/3 149/18
layman's [1] 47/2	line [6] 16/2 20/13 20/13 29/10 53/20 78/12	loss [14] 51/19 52/9 53/8 57/11 80/14 80/16 81/8 97/19 100/9 100/11 101/3 108/18 123/14 124/19	majority [1] 49/6	matches [2] 26/15 26/17
LCA001 [1] 142/12	lines [11] 3/17 4/16 5/2 58/9 58/15 58/18 92/25 101/10 106/16 107/12 107/13	lost [11] 61/24 123/6 123/15 124/1 126/8 128/8 128/13 129/3 133/11 140/4 142/8	make [15] 41/22 56/11 75/17 100/2 100/3 101/3 110/7 110/8 112/21 115/3 116/2 116/5 116/22 123/24 127/14	matching [1] 136/6
LCAS [1] 2/17	litigation [3] 34/17 71/17 88/19	lots [3] 2/2 52/1 75/13	major [5] 60/10 61/12 61/16 62/10 70/24	material [10] 27/12 28/2 38/4 42/25 45/9 74/7 76/24 94/18 139/6 139/8
LCAS0000224 [1] 1/15	little [16] 3/19 35/10 35/22 35/25 36/8 39/9 44/10 50/8 52/16 116/24 122/10 124/24 136/5 138/14 138/20 139/3	looks [2] 103/3 149/21	make [15] 41/22 56/11 75/17 100/2 100/3 101/3 110/7 110/8 112/21 115/3 116/2 116/5 116/22 123/24 127/14	matter [5] 25/3 30/23 53/5 74/14 117/24
LCAS0001300 [1] 138/3	live [1] 103/9	losing [2] 114/14 124/7	makes [3] 3/2 33/1 51/12	matters [4] 14/5 40/14 90/19 128/21
LCAS0001322 [1] 2/24	local [19] 95/8 95/12 97/20 97/21 98/21 100/9 100/11 100/15 100/22 101/3 101/5 101/13 101/16 106/10 106/15 106/21 107/19 107/24 108/2	loss [14] 51/19 52/9 53/8 57/11 80/14 80/16 81/8 97/19 100/9 100/11 101/3 108/18 123/14 124/19	making [6] 10/8 40/23 111/15 126/13 139/16 146/17	may [26] 14/6 37/10 41/20 53/12 65/4 67/17 68/11 71/19 76/5 77/5 77/6 77/15 79/9 86/4 91/24 92/23 94/22 109/9 120/16 122/7 129/2 135/16 137/3 138/24 139/17 142/7
lead [3] 8/17 80/1 111/5	log [18] 21/24 25/19 26/21 42/16 47/25 72/24 98/19 101/23 130/15 130/25 132/3 132/4 136/6 136/7 136/14 136/14 136/16 136/17	lot [11] 15/13 31/14 31/18 42/10 56/3 74/24 75/7 102/10 119/3 129/4 144/2	malformed [1] 21/8	maybe [5] 14/22 16/18 22/14 22/20 146/25
leaders [1] 102/24	log-off [2] 136/14 136/17	lots [3] 2/2 52/1 75/13	malfunctioned [1] 148/19	McEwan [1] 102/20
leads [2] 78/12 79/24	log-offs [1] 136/7		man [2] 34/5 47/7	me [50] 1/6 7/20 12/2 13/8 14/13 18/6 29/5 30/15 31/10 32/9 33/3 33/15 33/20 34/3 35/15 35/17 35/19 36/19 37/23 38/23 39/13 43/12 44/7 50/4 50/7 50/23 51/24 52/2 54/25 57/22 64/8 64/23 71/25 83/20 85/4 91/19 93/5 116/1 119/1 120/17 122/1 127/1 134/20 139/1 139/7 145/4 145/15 146/6 146/24 151/1
learn [1] 89/19	log-ons [1] 136/6		managed [1] 6/20	mean [44] 4/21 5/7 11/25 14/13 15/19 19/17 20/8 28/6 28/17 37/19 41/2 42/5 43/1
learnt [1] 86/12	logged [5] 130/12 136/21 136/22 142/19 143/3		management [7] 32/17 34/18 35/1 35/2 70/11 104/6 118/20	
least [4] 21/12 79/19 118/8 123/19	log' [2] 72/10 72/11		manager [24] 29/11 30/21 31/9 32/3 32/6 34/8 34/14 36/12 38/21 46/2 46/14 46/16 46/16 70/9 84/8 87/15 87/17 87/19 94/9 94/11 94/12 102/25 103/1 113/17	
leave [3] 52/2 57/8 57/9	log-off [2] 136/14 136/17		manager's [1] 70/11	
led [3] 31/11 34/21 114/3	log-offs [1] 136/7		managers [1] 46/11	
Lee [2] 2/17 29/12	logs [12] 43/19 46/21 47/10 47/21 71/3 72/1 72/2 72/2 72/24 97/24		manifested [1] 83/25	
Lee Castleton [1] 2/17			manipulation [2] 2/8 2/19	
left [5] 2/10 95/13 136/10 141/18 150/15			manual [2] 14/24 16/19	
Legacy [1] 150/9			manually [1] 142/16	
legal [8] 24/18 33/14 44/24 47/3 70/19 70/24 92/21 134/3			many [13] 6/15 62/4 62/14 62/14 74/13 74/20 77/21 78/12 79/10 79/24 89/11	
legible [1] 3/2				
length [2] 10/3 22/19				
lengthy [1] 131/23				
less [4] 36/19 56/7 58/13 68/5				
lessons [1] 86/12				
let [6] 15/6 51/24 57/22 71/25 125/21 133/10				
let's [4] 128/24 133/6 141/2 145/10				
letter [9] 17/11 17/16 18/2 18/18 18/20 19/7 25/13 40/18 51/11				
letters [2] 115/3 116/3				
level [10] 15/22 94/9 115/7 117/3 117/5 117/8 118/13 118/19				

M	33/16 37/22 41/11 43/1 47/25 49/15 56/20 57/14 61/14 65/18 67/8 68/21 75/6 75/7 75/22 76/7 76/8 86/18 92/23 94/1 99/24 111/4 112/23 117/8 117/17 120/6 122/9 129/14 129/16 129/22 132/16 134/6 137/18 137/19 137/20 137/23 139/12 145/13 149/22	1/10 1/11 35/25 50/13 50/22 71/12 78/1 79/11 142/16 151/5 most [5] 32/21 35/14 39/20 49/5 80/18 move [5] 2/13 17/7 58/22 91/6 137/1 MR [91] 1/4 6/22 13/12 13/17 13/24 14/8 14/17 15/5 17/14 18/10 18/12 24/2 24/12 25/14 26/7 29/16 29/19 30/1 30/7 32/2 32/18 34/5 34/14 34/24 34/25 35/8 35/13 36/13 36/25 38/3 40/17 43/10 44/6 44/7 44/24 46/12 46/12 47/9 50/4 59/5 62/6 69/16 70/13 71/14 72/5 81/17 81/20 83/1 84/1 87/17 87/19 88/2 89/3 91/12 92/4 94/16 102/20 114/7 115/15 117/23 118/18 119/17 121/22 126/17 131/6 133/7 133/9 133/17 134/2 134/3 135/25 136/21 138/2 142/6 142/12 142/19 144/8 144/12 144/16 144/19 144/20 145/2 145/9 145/23 146/9 149/10 149/14 149/16 150/10 150/20 152/4	Mr McEwan [1] 102/20 Mr Morgan [2] 44/6 44/7 Mr Parker [1] 46/12 Mr Peach [11] 29/19 30/7 32/2 32/18 34/14 34/25 35/8 35/13 36/25 46/12 89/3 Mr Peach's [2] 87/17 87/19 Mr Pinder [4] 34/24 36/13 88/2 134/2 Mr Winn [2] 115/15 118/18 Mr Winn's [2] 114/7 117/23 Mrs [7] 1/10 51/1 91/22 119/8 119/15 145/11 150/25 Mrs Chambers [7] 1/10 51/1 91/22 119/8 119/15 145/11 150/25 MS [3] 119/13 150/19 152/6 MS PAGE [3] 119/13 150/19 152/6 MSU [1] 22/13 much [22] 14/15 36/4 49/7 49/15 50/5 50/5 50/25 51/15 58/4 58/7 58/13 58/19 70/18 91/2 91/14 91/21 97/22 119/5 119/8 149/16 151/3 151/4 must [4] 14/8 89/8 89/19 103/1 my [54] 2/22 7/1 12/8 13/9 16/10 17/5 24/18 30/16 31/9 31/24 33/15 34/14 34/19 34/22 35/4 36/17 38/25 39/1 39/15 41/2 41/15 43/24 46/2 46/14 47/1 47/6 52/1 52/4 56/22 58/6 61/22 63/1 63/6 64/23 66/16 66/17 66/21 67/25 70/9 70/10 71/9 74/10 85/1 86/17 94/9 114/12 118/23 119/7 119/17 123/4 126/22 126/23 146/19 150/18 myself [3] 30/14 67/22 71/1	narrow [1] 85/16 nature [1] 63/4 NBSC [13] 15/9 15/10 16/4 49/9 77/22 78/4 79/7 96/18 96/23 98/24 98/25 99/2 104/3 nearer [1] 36/4 necessarily [9] 48/3 74/16 85/20 131/11 137/17 137/21 140/12 141/4 148/7 necessary [7] 32/1 93/1 112/13 129/19 130/24 142/1 142/1 need [22] 2/23 41/19 41/21 51/17 52/16 78/4 80/6 83/17 85/5 89/22 92/20 105/13 108/22 110/8 111/21 121/7 122/20 125/20 127/14 130/23 131/10 140/12 needed [12] 13/25 42/12 51/15 67/20 85/3 90/22 105/9 105/14 106/23 112/12 127/16 129/11 needn't [1] 71/14 needs [1] 76/18 negative [1] 123/17 net [1] 20/10 netting [1] 53/18 neutrally [1] 2/9 never [8] 30/15 33/13 33/14 76/2 92/11 101/7 120/13 150/8 Nevertheless [1] 88/11 new [4] 60/1 89/17 99/6 101/1 next [11] 3/3 4/15 5/22 17/3 21/16 52/24 57/12 74/11 101/8 106/24 107/21 night [6] 7/16 27/7 129/25 131/2 135/7 136/18 no [119] 4/14 6/8 7/17 10/21 12/16 15/2 17/5 20/24 22/13 23/3 24/20 27/19 29/21 29/25 30/6 30/24 31/13 31/21 31/23 32/16 34/1 34/11 34/16 34/20 35/9 37/13 38/12 40/2 41/24 42/2 42/5 42/25 43/7 43/16 44/23 44/25 45/4 45/11 46/18 47/4 47/14 47/14 47/22 47/23 47/24 50/4 53/23 54/17 54/17 54/23
mean... [31] 46/11 49/3 53/17 56/2 57/24 60/3 61/2 63/6 68/23 73/4 85/1 88/14 92/23 98/4 100/25 101/12 101/14 101/20 103/21 105/12 106/12 121/10 127/18 128/19 130/3 132/14 135/12 135/13 141/10 146/21 148/7 meaning [3] 58/24 66/14 114/14 means [6] 12/1 22/4 67/16 71/21 88/12 121/11 meant [6] 8/20 12/3 56/8 70/20 73/6 85/22 meantime [1] 10/25 meet [3] 59/14 73/23 74/1 meeting [9] 38/18 38/22 38/23 39/5 39/10 58/25 59/24 61/21 64/22 member [1] 34/17 members' [1] 65/14 memo [1] 69/6 memory [5] 17/23 37/13 39/9 66/16 88/5 mention [8] 30/24 34/11 64/25 145/19 146/7 146/12 146/15 147/4 mentioned [6] 10/22 27/14 34/8 35/15 85/13 115/6 merely [1] 73/22 message [28] 11/10 19/11 19/16 20/6 20/14 22/6 41/10 53/25 68/24 72/3 72/8 72/11 72/12 73/8 73/19 102/4 122/5 122/10 125/17 125/21 127/21 133/25 135/23 143/8 143/10 144/17 144/20 144/22 messages [13] 19/17 19/18 19/19 19/24 19/25 22/3 53/23 53/23 125/20 126/6 126/8 143/12 143/21 met [1] 145/22 methodology [1] 45/3 mid [1] 131/9 mid-transaction [1] 131/9 middle [4] 57/20 130/19 131/2 131/17 might [45] 16/7 16/9 21/1 23/18 29/7 30/16	33/16 37/22 41/11 43/1 47/25 49/15 56/20 57/14 61/14 65/18 67/8 68/21 75/6 75/7 75/22 76/7 76/8 86/18 92/23 94/1 99/24 111/4 112/23 117/8 117/17 120/6 122/9 129/14 129/16 129/22 132/16 134/6 137/18 137/19 137/20 137/23 139/12 145/13 149/22 Mik [9] 29/11 32/11 35/5 35/16 38/20 46/14 87/14 89/5 89/6 mind [10] 16/17 17/5 24/22 31/3 34/10 58/6 61/22 65/20 68/20 92/11 minutes [1] 100/2 miscarriage [1] 149/14 mismatch [2] 21/19 52/25 mismatches [1] 55/14 miss [2] 48/25 66/21 missed [4] 41/4 41/11 67/8 150/7 missing [15] 14/10 20/3 21/9 23/4 23/8 23/20 26/22 28/10 28/13 61/13 61/15 129/3 137/13 137/18 149/6 mistakes [2] 45/2 74/19 misunderstanding [1] 44/5 Mm [3] 22/16 31/4 31/6 moment [5] 2/13 3/21 42/23 50/12 113/5 money [6] 14/9 14/10 25/2 132/18 132/19 149/17 monitor [1] 14/25 months [4] 101/22 101/22 106/18 109/11 more [33] 3/10 3/23 7/14 14/22 31/14 33/6 35/10 35/24 36/19 39/22 40/24 43/2 48/5 48/7 48/9 48/10 48/11 48/13 49/7 55/1 58/4 58/7 58/19 61/10 65/24 76/18 82/16 85/15 104/21 108/2 112/23 140/1 149/17 Morgan [3] 44/6 44/7 59/7 morning [12] 1/5 1/9	Mr Justice Fraser's [1] 94/16		

<p>N</p> <p>no... [69] 55/10 56/14 57/4 60/5 64/19 65/5 66/17 66/22 70/4 70/7 70/16 77/7 77/12 78/24 81/21 86/5 86/21 86/21 86/24 88/5 88/9 89/6 90/5 90/7 90/10 92/17 92/18 94/2 101/18 102/5 109/22 117/19 120/15 120/15 121/16 122/9 123/9 125/16 125/17 127/10 127/12 134/24 134/25 135/14 136/1 136/6 136/13 136/13 137/9 137/23 140/21 141/6 141/8 141/10 144/1 145/4 145/5 145/6 145/16 147/1 147/25 148/7 148/7 148/12 149/5 149/11 150/2 150/15 150/23</p> <p>nobody [6] 42/2 42/12 57/10 94/7 147/3 150/16</p> <p>nodded [1] 120/5</p> <p>node [7] 122/12 122/23 123/14 123/15 124/8 142/18 142/19</p> <p>nominally [1] 67/25</p> <p>non [2] 26/2 77/11</p> <p>non-disclosure [1] 77/11</p> <p>non-transactional [1] 26/2</p> <p>none [1] 96/25</p> <p>nor [3] 34/12 46/6 86/22</p> <p>normal [7] 12/7 36/18 37/2 37/3 37/4 55/23 105/25</p> <p>normally [2] 121/22 134/14</p> <p>not [179]</p> <p>not uncommon [1] 20/20</p> <p>note [6] 25/12 59/2 59/17 111/15 113/2 134/6</p> <p>noted [1] 1/21</p> <p>notes [3] 42/3 97/15 141/19</p> <p>nothing [7] 22/22 28/24 28/25 29/6 97/2 148/18 149/23</p> <p>notice [1] 15/15</p> <p>noticed [1] 22/13</p> <p>notices [1] 57/10</p> <p>November [2] 101/17 134/2</p> <p>now [45] 6/8 7/23</p>	<p>10/2 21/11 27/25 29/1 29/3 31/14 31/14 34/19 35/10 35/16 40/12 42/7 51/15 51/19 54/2 56/25 66/20 69/3 77/14 77/20 78/23 84/13 85/23 91/6 91/9 94/18 96/20 96/23 100/19 107/3 112/2 118/15 121/10 121/22 122/8 136/1 136/10 137/4 139/5 139/7 146/1 149/13 150/12</p> <p>number [12] 2/17 11/18 13/11 25/22 25/23 81/10 94/24 101/15 101/16 106/18 119/16 142/11</p> <p>numbered [1] 96/2</p> <p>numbers [10] 51/16 60/19 63/1 108/3 142/24 142/25 143/1 143/2 148/2 148/8</p> <p>O</p> <p>obligation [3] 71/18 77/7 145/23</p> <p>obligations [2] 93/25 146/10</p> <p>observation [1] 123/24</p> <p>observed [2] 105/23 107/5</p> <p>obtain [1] 104/5</p> <p>obtainable [1] 103/11</p> <p>obtained [3] 25/18 26/1 72/21</p> <p>obtaining [1] 38/4</p> <p>obvious [2] 61/25 150/24</p> <p>obviously [21] 15/13 22/24 28/25 42/7 52/25 53/17 54/17 55/1 57/8 64/1 64/10 64/10 80/7 102/11 106/22 111/9 116/4 116/24 120/8 146/8 148/12</p> <p>occasion [2] 103/2 140/23</p> <p>occasionally [4] 8/16 27/3 37/8 93/5</p> <p>occasions [1] 33/19</p> <p>occur [2] 109/21 138/15</p> <p>occurred [3] 29/5 30/15 112/22</p> <p>occurring [2] 34/2 124/4</p> <p>occurs [1] 134/16</p> <p>odd [5] 6/7 31/8 100/10 100/12 100/16</p> <p>off [17] 5/17 5/18</p>	<p>8/14 8/24 19/21 58/11 79/5 80/12 83/6 91/10 113/11 126/16 136/14 136/16 136/17 136/23 149/3</p> <p>offence [1] 25/1</p> <p>offer [1] 139/8</p> <p>offered [3] 139/11 144/19 144/21</p> <p>office [60] 10/24 12/9 13/16 15/18 15/21 15/24 16/2 16/11 16/25 17/14 24/11 25/1 25/7 25/14 25/20 26/5 34/6 34/7 38/20 39/25 40/7 57/2 57/14 57/15 58/12 60/12 62/12 67/2 67/11 73/6 73/22 78/16 82/2 82/3 82/17 82/22 83/10 83/19 83/23 84/16 86/14 88/12 88/16 90/22 108/9 111/5 112/2 112/19 113/1 113/4 113/20 113/22 115/21 115/24 116/10 116/10 116/16 118/6 120/8 127/4</p> <p>Office's [7] 13/5 17/13 71/9 82/7 82/8 85/25 133/10</p> <p>offs [1] 136/7</p> <p>often [1] 125/6</p> <p>Oglesby [1] 59/18</p> <p>Oh [7] 14/21 15/10 43/11 83/5 95/1 118/17 143/14</p> <p>ok [2] 8/12 8/16</p> <p>okay [17] 2/14 3/16 6/10 7/12 12/14 12/17 23/2 23/22 24/7 38/13 53/19 55/2 91/5 95/1 95/24 135/4 149/24</p> <p>old [5] 103/18 103/24 106/9 106/16 108/22</p> <p>older [1] 106/18</p> <p>OLIVIA [2] 1/3 152/2</p> <p>on [209]</p> <p>once [4] 5/10 67/22 102/13 148/25</p> <p>ONCH [2] 4/16 4/25</p> <p>one [52] 12/3 15/22 21/2 29/4 32/11 38/22 43/24 44/25 46/11 53/20 55/21 59/17 59/17 61/16 65/18 66/14 75/2 77/9 77/12 78/7 79/19 81/6 81/7 81/8 91/23 95/25 97/1 97/18 100/21 109/10 109/13 109/15 109/17 110/3 114/1 114/23 119/9 119/24 121/5 121/8 121/13 122/1</p>	<p>122/4 122/12 124/16 131/1 137/1 140/23 142/14 143/5 150/13 150/15</p> <p>ones [4] 20/24 49/4 109/19 139/12</p> <p>ongoing [1] 115/8</p> <p>Online [1] 95/4</p> <p>only [35] 5/9 6/23 12/23 20/18 21/6 22/3 22/8 22/19 29/4 43/19 50/6 55/2 55/6 61/5 66/5 66/7 66/13 69/7 73/17 74/2 75/10 90/19 91/2 95/21 103/18 119/5 123/11 124/14 130/17 134/14 136/4 136/9 141/16 147/17 148/22</p> <p>ons [1] 136/6</p> <p>onto [3] 48/20 49/2 148/9</p> <p>open [1] 12/2</p> <p>opened [1] 96/9</p> <p>opening [9] 10/4 26/3 52/19 100/16 100/18 100/23 101/8 103/18 103/21</p> <p>operational [1] 124/2</p> <p>opinion [5] 53/5 81/19 85/10 85/13 93/20</p> <p>opportunity [1] 31/21</p> <p>opportunity.' [1] 72/6</p> <p>opposite [1] 45/6</p> <p>option [3] 34/20 65/5 85/13</p> <p>options [1] 15/1</p> <p>or [151] 6/21 9/20 11/5 13/4 14/2 14/8 14/9 14/11 14/24 16/9 18/5 21/2 23/14 23/15 23/23 24/21 27/20 28/8 29/11 29/14 30/4 30/15 32/6 33/12 33/15 33/21 33/21 35/5 36/19 37/22 37/23 38/3 38/3 38/4 38/22 39/21 39/23 39/24 40/2 40/6 40/7 40/9 41/8 41/21 42/3 42/12 43/18 45/2 46/2 46/12 46/14 46/17 46/17 47/5 47/11 52/5 52/15 53/8 54/18 55/23 55/24 56/9 56/9 56/23 60/8 60/16 60/24 60/25 61/3 61/3 61/6 61/10 61/11 61/18 65/18 66/14 69/21 69/22 70/14 70/15 71/4 71/20 71/20 74/16 75/2 78/13 78/24 79/25</p>	<p>81/22 82/13 82/21 82/24 84/3 84/7 85/10 87/5 92/11 92/18 92/19 93/12 93/19 94/14 97/1 98/21 99/4 99/6 101/3 101/4 102/2 102/25 102/25 104/19 108/18 109/16 113/24 114/14 114/16 116/15 117/9 118/7 118/7 120/6 120/6 121/19 123/14 123/19 124/4 124/8 127/9 129/3 129/22 130/21 131/1 131/8 132/9 132/18 137/14 139/10 139/14 140/15 140/20 141/9 141/11 142/12 143/19 144/18 144/24 145/9 148/20 149/3 149/3</p> <p>Oracle [1] 102/6</p> <p>order [5] 1/23 3/14 17/2 93/25 140/7</p> <p>ordered [1] 3/13</p> <p>ordinarily [1] 29/15</p> <p>organise [1] 14/2</p> <p>original [2] 41/5 66/24</p> <p>originally [2] 20/25 41/12</p> <p>other [45] 6/17 6/19 7/10 18/13 27/23 28/19 29/1 33/10 40/24 42/9 43/14 56/5 69/3 71/20 74/13 74/20 74/21 75/14 83/11 84/2 93/3 93/18 98/20 101/5 101/25 106/8 106/16 106/20 115/25 121/1 121/17 124/14 125/10 132/13 134/17 135/7 136/4 136/5 137/1 138/15 138/19 139/4 139/8 141/17 145/20</p> <p>others [6] 75/1 81/1 87/3 87/5 108/9 134/3</p> <p>otherwise [3] 21/18 122/2 144/5</p> <p>ought [3] 8/6 64/4 75/17</p> <p>our [6] 30/17 34/6 83/22 103/8 114/11 118/1</p> <p>ourselves [2] 1/13 1/14</p> <p>out [49] 10/1 10/7 12/1 14/5 20/12 25/10 28/5 30/20 40/10 40/12 43/14 45/1 45/10 48/3 48/7 49/15 56/4 58/6 58/16 60/11 62/12 62/24 83/18</p>
---	---	---	---	---

O
out... [26] 97/21
 97/24 103/25 105/6
 105/10 115/12 115/16
 115/17 116/18 117/21
 118/2 118/6 121/17
 126/22 129/22 130/12
 130/15 132/10 132/17
 132/19 135/19 140/9
 142/15 145/23 145/24
 149/17
outcome [3] 79/23
 82/6 89/13
outlet [1] 10/22
outlier [1] 118/15
outline [1] 25/12
outlined [2] 107/7
 109/14
outset [1] 89/8
outside [3] 16/4
 83/25 85/21
over [23] 4/15 11/6
 19/18 33/19 34/9
 59/15 61/2 61/24
 63/20 76/23 79/5 85/9
 89/14 91/7 101/1
 101/7 107/21 107/23
 122/25 127/16 141/25
 144/3 151/1
overall [4] 6/24 40/4
 90/17 137/3
overarching [2]
 82/23 128/12
overnight [11] 4/22
 5/12 8/23 10/12 27/8
 127/3 129/24 131/12
 134/15 134/21 136/12
oversight [1] 146/19
overwrite [1] 122/1
overwritten [2] 122/3
 124/21
owed [1] 25/2
own [2] 41/2 123/13

P
page [50] 3/1 3/3 3/6
 3/18 3/20 3/21 3/21
 4/13 4/15 4/15 8/1 8/2
 11/6 12/20 13/22
 17/10 17/16 19/1 19/6
 19/9 33/5 36/1 36/9
 38/15 38/15 38/16
 51/4 51/5 57/20 59/21
 59/23 63/20 64/12
 87/10 104/17 105/16
 113/9 113/10 113/15
 119/13 122/21 122/25
 127/24 128/2 128/8
 133/22 138/4 138/5
 150/19 152/6
page 1 [1] 36/9
page 14 [1] 12/20
page 17 [1] 13/22

page 19 [2] 38/15
 38/15
page 2 [2] 8/1 36/1
page 23 [1] 51/4
page 24 [1] 57/20
page 271 [1] 138/4
Page 29 [1] 127/24
page 3 [1] 113/15
page 4 [1] 59/21
page 40 [1] 128/8
page 5 [1] 122/21
page 69 [1] 17/10
page 7 [1] 133/22
pages [2] 58/3 58/3
paid [4] 132/9 132/17
 132/19 142/15
paper [4] 26/7 26/13
 93/19 94/6
paragraph [20] 13/21
 19/9 24/9 33/5 36/10
 38/14 38/16 51/6
 54/11 64/17 74/9
 74/11 117/1 122/22
 122/24 123/1 123/2
 123/22 123/23 125/14
paragraph 1 [1] 24/9
paragraph 17 [2]
 122/22 122/24
paragraph 18 [1]
 123/2
paragraph 19 [1]
 123/22
paragraph 21 [1]
 123/23
paragraph 51 [1]
 13/21
paragraph 56 [1]
 33/5
paragraph 61 [2]
 38/14 38/16
paragraph 74 [1]
 51/6
paragraph 76 [1]
 54/11
paragraphs [7] 12/21
 14/6 17/24 26/25
 64/19 64/20 117/24
paragraphs 41 [1]
 12/21
Parker [1] 46/12
part [17] 5/10 15/19
 24/9 24/10 27/7 30/16
 33/13 38/5 44/2 53/21
 63/23 65/13 96/18
 115/7 119/24 134/15
 146/19
Participant [1]
 119/10
particular [18] 17/23
 18/12 21/7 30/23 34/2
 37/8 37/23 43/19
 47/25 58/15 63/9 81/7
 89/7 107/25 118/13
 128/7 129/17 143/13

particularly [5] 3/2
 9/16 85/18 89/9
 129/12
parties [1] 71/17
partly [5] 7/3 41/2
 50/4 83/1 126/20
Partner [1] 59/7
parts [4] 19/7 120/19
 120/19 147/18
party [2] 71/5 83/11
pass [3] 15/23 16/10
 79/3
passage [2] 57/19
 61/15
passed [12] 12/5
 16/15 42/8 43/13
 77/24 79/5 79/20 81/1
 94/11 96/25 144/12
 148/25
passing [4] 12/8
 78/11 78/19 94/10
past [2] 86/4 139/24
pasted [1] 71/15
pat [1] 90/8
Pause [2] 52/17
 131/7
pay [1] 80/15
payment [1] 132/6
payments [4] 21/19
 55/14 129/13 132/5
PC0223870 [1] 96/2
Peach [14] 29/11
 29/19 30/7 32/2 32/18
 34/14 34/25 35/8
 35/13 36/25 46/12
 46/14 87/14 89/3
Peach's [3] 38/20
 87/17 87/19
PEAK [17] 7/23 7/24
 8/4 13/8 13/18 16/14
 49/12 49/13 76/5
 76/12 76/13 96/1 99/5
 99/8 99/9 110/2 110/7
PEAKs [11] 46/5 46/6
 48/16 95/25 109/10
 109/17 146/15 146/17
 146/18 146/21 146/23
Pearce [2] 17/13 59/7
penalised [2] 78/11
 78/18
penalty [1] 78/22
pence [1] 120/6
penny [4] 37/8 37/14
 38/3 120/4
pension [4] 132/14
 132/18 142/5 142/14
pensions [1] 56/5
people [17] 15/23
 16/25 31/18 37/7 38/2
 43/14 52/2 65/17
 65/20 69/8 76/21
 109/23 118/25 140/4
 141/3 141/19 146/18
perfectly [1] 129/2

performing [1] 37/18
perhaps [13] 21/1
 24/19 37/7 69/10
 70/17 73/13 75/16
 84/8 118/20 126/19
 146/4 146/21 147/2
period [23] 10/2 10/3
 19/18 26/1 50/3 52/20
 52/24 55/3 95/14
 97/17 98/2 98/10
 98/11 98/13 98/13
 100/14 101/2 101/4
 101/8 107/22 143/16
 144/3 144/25
periods [6] 98/6 98/6
 98/8 103/19 103/22
 123/12
persisted [1] 13/14
persistent [1] 80/10
person [10] 16/8
 29/13 29/23 30/4
 30/10 68/6 98/25
 113/20 141/18 143/3
personal [1] 85/2
personally [4] 43/15
 60/1 78/9 145/4
perspective [1]
 118/14
phone [3] 15/14
 115/5 117/1
phrase [2] 39/10
 39/12
physical [1] 123/10
pick [3] 95/24 129/14
 134/19
picked [11] 23/16
 26/24 28/10 41/18
 62/2 68/18 80/6 99/21
 129/16 129/19 139/13
picking [2] 33/1 52/7
piece [2] 1/12 5/3
Pinder [12] 18/5 32/7
 34/8 34/24 35/14
 36/13 39/21 46/17
 87/14 88/2 133/24
 134/2
place [9] 25/6 109/2
 109/5 109/8 109/12
 140/17 142/10 148/17
 148/24
placed [1] 68/12
places [1] 140/9
please [73] 1/12 1/15
 2/24 3/1 3/4 3/6 3/7
 3/16 3/20 3/22 3/23
 4/15 6/9 7/23 8/1 8/21
 10/25 11/6 12/19
 12/20 13/22 17/7 17/9
 17/10 18/8 18/16
 18/17 19/1 19/6 20/8
 22/5 23/25 33/4 33/5
 33/6 36/9 38/13 38/15
 50/16 51/24 54/10
 57/19 57/20 57/22

58/22 59/21 59/22
 63/10 64/12 70/22
 87/9 87/10 89/1 96/8
 97/14 99/10 100/25
 104/3 104/16 106/13
 108/5 110/1 110/6
 110/6 113/8 113/9
 114/6 114/21 117/23
 122/20 122/21 122/22
 133/22
plugging [1] 138/12
pm [2] 91/15 151/8
POA [2] 88/11 89/18
point [34] 2/15 4/23
 5/9 10/9 13/6 19/16
 22/7 24/14 30/24
 34/12 46/13 51/13
 59/20 68/14 68/24
 69/1 69/11 76/18 82/5
 82/10 85/2 86/17
 89/12 91/10 99/7
 100/21 101/6 102/3
 106/17 127/20 129/9
 130/11 135/2 136/25
pointed [1] 62/24
pointing [1] 43/14
points [1] 51/11
POL [3] 16/16 16/17
 133/13
POL0000994 [1]
 124/18
POL00028744 [1]
 110/1
POL00069622 [1]
 58/23
POL00071234 [1]
 127/23
POL00081826 [1]
 133/21
POL00090437 [1]
 17/9
POL00098189 [1]
 113/9
POLFS [1] 52/3
POLFS/FP [1] 52/3
policy [1] 86/22
politically [1] 117/12
POLSAP [2] 106/3
 108/15
position [7] 14/2
 30/14 32/12 42/15
 71/2 94/3 117/18
positively [1] 145/20
possibility [7] 65/1
 124/7 124/9 124/11
 137/9 137/15 142/4
possible [10] 9/24
 10/19 18/5 19/23
 21/25 23/23 56/19
 78/6 115/2 116/4
possibly [15] 35/9
 37/21 37/25 41/6
 65/23 75/3 78/15
 79/20 82/1 82/3 84/15

P	preparing [3] 38/6 93/3 93/11	123/9 133/3 133/15 136/12 140/19 146/13 148/2 149/19	proved [1] 65/3	65/9 67/19 84/21 86/8 86/20
possibly... [4] 99/3 99/24 132/11 142/14	present [5] 21/23 38/21 124/7 125/16 127/17	problems [27] 13/4 47/10 60/17 62/11 62/13 62/20 63/5 63/9 67/15 67/16 78/3 78/6 80/18 82/13 82/14 83/4 83/15 84/3 106/5 112/23 124/14 124/14 125/3 134/23 137/12 139/17 141/8	provide [4] 29/12 34/3 51/13 65/11	ran [1] 103/8
Post [61] 10/24 12/9 13/4 13/16 15/18 15/20 15/24 16/2 16/11 16/25 17/12 17/14 24/11 25/1 25/14 25/20 26/5 34/7 39/24 40/7 57/14 57/15 58/11 67/1 67/11 71/9 73/6 73/22 78/16 82/2 82/2 82/6 82/8 82/17 82/22 83/10 83/19 83/23 84/16 85/25 86/14 88/12 88/16 90/22 108/8 111/5 112/2 112/19 113/1 113/4 113/20 113/22 115/20 115/24 116/9 116/10 116/16 118/6 120/8 127/4 133/10	presentation [1] 85/24	proceedings [11] 8/9 33/11 33/14 33/17 65/12 67/11 84/24 85/7 86/1 93/14 93/17	provided [5] 2/5 33/25 40/18 45/16 150/24	range [4] 44/16 50/5 85/6 97/25
postage [6] 6/17 6/23 6/24 7/8 7/9 7/10	presented [4] 6/13 128/15 130/5 133/13	procedure [1] 89/22	provision [1] 93/23	rarity [1] 142/3
postmaster [12] 10/25 12/5 56/3 67/3 77/20 80/10 97/6 109/24 130/19 132/7 133/2 141/10	presently [1] 51/3	procedures [2] 89/15 128/16	pulling [1] 10/1	rather [23] 19/24 22/6 30/19 35/2 35/19 36/25 45/6 46/4 53/11 60/25 61/3 65/16 65/23 82/12 82/18 84/13 85/16 109/24 119/2 128/18 131/22 140/15 145/20
postmaster's [1] 84/9	pressure [1] 31/7	proceedings [11] 8/9 33/11 33/14 33/17 65/12 67/11 84/24 85/7 86/1 93/14 93/17	purpose [4] 25/12 38/25 59/13 100/20	reaction [1] 35/10
postmasters [13] 6/10 61/1 61/4 61/6 78/15 81/16 82/6 83/21 98/8 116/6 116/19 116/21 132/14	pressured [4] 30/8 30/9 30/12 30/13	process [27] 5/10 9/6 9/12 13/7 14/11 16/19 16/23 27/4 36/18 37/3 37/3 37/5 38/5 44/2 45/22 63/23 64/3 64/15 84/23 85/3 99/9 99/11 105/25 106/20 110/21 127/4 130/2	purposes [1] 99/20	read [10] 8/6 8/7 12/21 17/21 24/9 33/8 35/5 90/15 100/6 128/7
potential [2] 74/17 131/14	prevented [1] 106/4	process-wise [1] 16/23	pursuant [1] 71/18	ready [1] 44/11
potentially [8] 46/15 46/17 46/17 111/20 124/1 137/13 137/20 139/7	previous [3] 37/6 100/14 113/23	processes [3] 12/25 55/23 57/16	pursued [3] 28/16 28/19 62/7	realise [1] 83/20
pounds [1] 9/21	previously [5] 28/1 28/14 71/24 101/22 110/4	processing [1] 58/14	put [24] 10/6 28/3 32/12 32/13 42/14 48/18 50/7 68/14 77/14 99/6 99/19 100/11 107/19 108/2 109/2 109/5 109/8 109/12 115/9 132/24 139/15 140/11 140/14 140/15	realised [3] 50/8 73/14 82/5
power [3] 83/22 83/24 130/20	primary [2] 82/7 82/8	produce [2] 24/15 58/10	putting [2] 2/17 99/16	really [29] 14/16 18/7 22/23 40/22 45/4 51/24 54/17 57/22 57/24 58/16 58/19 60/3 67/20 70/10 72/19 75/15 82/3 83/10 85/1 94/10 102/8 117/24 118/24 127/19 136/2 137/5 138/17 144/9 149/19
PowerHelp [12] 37/23 46/4 47/18 47/20 48/13 48/17 48/20 49/2 49/6 49/11 52/6 99/6	printed [6] 2/6 2/20 5/16 5/25 26/6 56/4	produced [7] 2/16 19/19 69/12 70/5 84/24 104/11 143/9	query [3] 21/23 43/22 102/14	reanalysed [1] 58/8
practice [2] 99/18 115/20	printing [2] 5/17 5/18	producing [1] 143/18	question [10] 31/11 38/1 91/24 93/22 123/14 123/16 130/7 131/6 145/9 145/16	reason [14] 7/4 23/4 41/11 52/14 57/4 77/11 80/16 103/12 109/22 128/25 130/21 133/2 134/11 147/1
practices [1] 82/21	prior [1] 124/3	product [6] 41/25 44/20 101/10 101/14 101/15 102/15	questioned [5] 1/4 119/13 146/5 152/4 152/6	reasonable [1] 150/3
precedes [1] 7/5	priority [3] 102/20 102/22 102/23	products [2] 52/22 100/23	questions [23] 31/25 50/5 50/7 62/13 62/17 62/18 67/24 91/3 105/11 106/24 110/10 111/1 111/16 111/17 119/6 119/7 119/9 126/18 138/1 138/5 147/9 150/18 150/22	reasonably [2] 124/19 128/3
precise [2] 10/3 113/5	prison [1] 67/17	progress [3] 12/23 14/19 90/19	quite [11] 20/25 28/3 45/21 51/13 64/10 64/13 72/19 83/16 83/20 99/3 142/23	reassured [1] 36/19
precisely [2] 37/4 70/20	probable [4] 66/25 121/5 121/8 121/13	prompted [1] 132/8	quoted [2] 144/8 144/16	reboots [1] 136/3
preparation [1] 37/11	probably [25] 16/10 18/4 28/6 35/18 48/9 58/18 60/18 61/10 61/19 61/22 66/9 68/16 69/12 73/6 76/25 80/5 80/25 81/17 99/2 103/2 103/16 120/11 121/7 139/18 141/24	promptitude [1] 48/2	quoting [2] 71/8 134/8	recalculating [1] 51/9
prepare [1] 114/11	problem [64] 10/21 13/13 20/20 21/5 21/7 22/13 23/13 48/1 48/8 48/23 49/2 49/10 53/3 53/13 54/21 54/23 56/18 56/21 60/8 60/9 61/16 66/7 66/25 69/22 77/19 79/2 79/13 79/16 83/12 84/4 84/5 90/19 103/20 104/18 104/24 105/4 106/1 106/3 106/10 107/6 107/9 107/15 107/25 108/1 108/11 108/23 113/3 114/4 115/4 115/6 115/23 116/9 116/11 116/20 117/2 118/24	promptly [1] 86/16	raising [7] 14/18 35/1	recall [13] 34/13 37/15 39/4 40/10 62/18 90/1 92/7 92/12 112/19 115/25 117/5 118/12 145/15
prepared [5] 30/21 31/21 36/4 36/15 78/8		proof [1] 143/24	raise [2] 69/20 109/24	recently [4] 61/17 62/24 72/3 73/18

R	regardless [1] 102/16 Regent [1] 114/24 regularity [1] 141/24 regulate [1] 65/10 regulating [1] 65/20 reinsert [1] 126/2 reinserted [1] 126/6 relating [2] 106/9 106/21 relation [3] 7/25 94/18 94/21 relevance [4] 74/17 75/24 129/23 130/9 relevant [11] 4/12 32/22 45/15 68/22 70/25 74/7 74/15 75/18 76/9 76/23 145/13 reliability [2] 85/15 85/20 reliance [1] 73/21 reluctant [1] 79/3 reluctantly [1] 36/20 rem [2] 129/22 129/22 remained [1] 133/3 remaining [1] 101/18 remember [38] 1/16 10/3 18/3 18/7 21/1 27/16 29/4 37/17 37/21 38/7 39/18 46/2 59/9 59/11 61/23 63/13 69/24 77/14 78/23 87/12 91/25 92/15 96/20 96/22 96/25 100/20 104/19 109/15 112/2 112/25 113/7 126/24 127/8 128/6 132/12 135/17 135/21 144/18 remembered [1] 7/18 remembering [1] 60/22 remind [1] 1/14 reminded [1] 7/20 remove [1] 106/4 removed [12] 98/21 105/24 106/19 108/23 110/9 110/14 110/15 110/20 110/22 110/23 111/22 112/12 removing [1] 112/8 repeat [1] 106/24 repeated [2] 11/13 65/1 repetition [1] 11/9 replaced [1] 125/4 replacement [7] 107/18 123/7 123/25 124/3 124/15 126/15 131/1 replica [1] 47/20 replicate [1] 125/22	replicating [1] 45/1 reply [3] 88/25 114/7 117/23 report [33] 5/15 5/16 5/17 5/19 7/5 7/8 7/19 8/14 8/19 15/6 22/11 22/14 22/18 23/14 24/1 27/6 27/9 27/11 27/25 28/5 28/8 87/8 87/12 98/16 104/4 104/10 104/11 132/22 132/22 143/9 144/5 144/13 149/9 reported [5] 32/14 61/1 80/22 97/6 149/8 reporting [2] 13/25 149/11 reports [10] 10/5 20/23 21/3 33/21 56/3 56/11 58/6 98/2 107/10 107/16 represents [1] 26/6 request [2] 25/23 113/24 requested [2] 29/12 113/25 requesting [1] 34/21 requests [1] 71/5 required [2] 1/22 14/12 requirement [2] 73/24 74/2 requires [1] 21/22 researched [1] 2/4 reset [1] 126/3 resolution [2] 78/14 79/25 resolve [2] 84/8 108/14 resolved [3] 48/2 98/18 107/13 resort [1] 140/6 respect [2] 43/7 59/2 36/17 40/18 49/13 77/9 77/12 responsibilities [2] 40/8 40/11 responsibility [9] 13/5 24/3 29/15 43/16 47/6 49/9 78/9 83/7 118/21 responsible [4] 14/10 94/5 127/11 144/14 rest [1] 80/20 restarted [3] 134/10 135/2 136/8 restarts [6] 134/14 134/17 135/8 135/20 137/4 137/16 result [11] 18/1 23/20 33/17 65/9 67/19 90/6 95/9 123/6 124/1	129/3 133/12 resulted [1] 149/14 results [1] 28/21 resume [2] 50/15 91/13 retain [2] 41/25 42/12 retained [4] 22/24 103/23 105/2 110/24 retrieval [1] 21/22 retrieve [1] 22/11 retrieved [3] 21/21 22/22 26/12 return [1] 91/24 reveal [1] 47/25 revealed [4] 42/15 46/7 47/10 49/21 revelation [1] 71/9 review [12] 17/18 63/18 66/2 66/23 68/9 68/12 68/19 85/6 87/25 88/4 92/21 93/14 reviewed [1] 115/12 reviewing [1] 44/25 Richard [1] 59/6 rid [2] 76/16 111/14 right [51] 3/18 8/4 17/19 19/3 24/2 24/4 24/20 47/5 48/11 50/6 58/18 60/14 81/24 83/17 87/15 87/18 92/10 94/24 100/4 104/14 107/1 115/18 116/12 117/15 119/17 122/9 124/12 125/19 126/11 127/3 127/12 129/15 130/17 133/6 135/6 136/17 137/6 137/11 137/16 138/1 140/3 141/4 141/14 141/19 141/20 141/21 143/5 143/14 145/17 146/1 147/9 Riposte [2] 102/3 135/1 rise [1] 148/19 robust [2] 147/12 148/6 robustness [1] 147/24 role [6] 15/20 17/1 30/17 65/14 68/4 68/17 roll [2] 101/6 107/21 rolled [4] 61/24 97/17 101/1 107/22 rollover [1] 100/14 round [1] 34/23 route [2] 12/7 13/15 routed [1] 99/8 routine [1] 89/15 Rowe [1] 17/11 rules [2] 43/15 71/19 run [3] 16/19 41/7	127/1 run-up [2] 41/7 127/1 running [1] 10/8 RX [1] 110/17
			S	
			said [53] 2/18 9/7 12/8 15/2 15/10 16/14 16/18 18/9 22/22 27/19 30/23 31/10 31/12 31/23 34/16 35/5 35/8 36/10 36/22 37/2 41/15 42/2 42/12 44/8 46/11 47/4 47/17 52/8 54/22 60/1 60/23 61/11 62/8 62/21 67/20 70/4 73/10 73/15 77/15 83/13 88/9 92/6 96/17 102/12 103/3 116/7 117/22 118/11 135/25 137/17 146/3 147/7 148/10 sale [2] 20/4 23/8 same [23] 2/8 2/20 4/3 5/4 5/11 7/6 8/22 22/2 23/4 26/6 37/18 53/4 53/7 58/7 59/19 68/14 81/13 92/24 95/14 122/3 130/25 136/14 136/22 Saturday [1] 129/24 saw [5] 17/25 35/5 40/20 61/17 79/10 say [73] 2/4 2/11 6/14 7/1 8/11 10/18 12/22 13/23 19/10 20/2 20/19 21/16 21/25 28/25 31/21 36/7 37/2 38/17 39/15 42/12 42/14 49/5 51/1 51/6 52/5 52/8 54/10 57/20 60/19 61/5 61/11 63/3 64/21 66/3 66/19 68/16 70/23 72/14 72/24 73/4 73/7 78/17 79/24 80/17 81/14 82/1 83/16 84/7 92/17 103/17 104/16 104/23 106/21 108/21 111/1 111/16 112/4 112/13 112/14 115/1 116/1 120/4 120/6 123/3 123/20 126/1 129/23 132/8 139/5 141/21 145/10 149/24 150/12 saying [15] 14/21 15/9 27/21 27/24 27/25 31/5 47/8 48/23 58/9 77/1 125/5 127/3 138/23 144/16 144/19 says [7] 5/6 12/10 113/25 117/25 118/9 128/2 134/4	

S				
<p>scope [1] 115/3 scratch [1] 58/17 screen [6] 130/21 131/8 131/17 133/12 137/12 137/14 screens [1] 6/14 scroll [27] 3/16 3/22 3/23 17/21 17/22 22/1 25/17 33/6 54/10 57/19 59/21 59/22 88/25 96/8 97/14 99/10 100/6 104/2 104/16 108/5 114/6 114/21 117/23 128/14 133/25 138/5 138/14 scrolling [3] 51/18 110/6 128/17 searched [2] 134/18 135/9 searching [2] 99/20 99/21 second [13] 3/21 5/3 6/18 17/24 18/25 22/2 64/19 64/20 66/2 109/15 122/11 125/13 133/7 Secondly [1] 95/6 seconds [1] 6/2 section [9] 7/8 70/22 77/18 77/18 127/24 128/3 128/7 128/10 135/11 section 12 [1] 128/3 section 3 [1] 70/22 section 4 [1] 77/18 secure [1] 34/6 Security [22] 29/14 29/23 30/10 30/21 31/2 32/7 34/8 34/24 36/12 37/7 38/4 38/8 46/3 69/8 70/10 73/3 74/5 74/15 75/22 87/14 93/24 94/12 see [99] 1/5 2/25 3/2 3/4 3/7 3/16 3/24 4/10 4/16 5/2 5/15 5/23 5/24 6/5 6/6 6/25 7/7 10/10 10/14 14/14 14/17 14/21 17/11 18/17 18/23 18/25 19/1 21/23 22/10 25/24 28/1 28/5 33/8 34/23 36/1 41/10 43/25 45/4 50/22 51/1 52/19 53/10 55/3 55/8 55/16 55/19 57/6 59/13 59/22 66/6 80/19 83/13 87/8 87/9 88/25 90/18 91/18 96/1 96/8 99/24 104/9 104/15 105/9 105/16 105/20 113/10 113/16</p>	<p>114/6 114/12 114/22 115/10 117/23 121/2 124/20 124/25 125/12 126/14 127/23 128/1 128/10 128/14 128/17 128/19 128/19 129/23 135/12 135/13 135/22 135/23 136/6 136/20 142/10 142/11 142/11 142/21 145/7 148/13 149/4 149/20 seeing [1] 129/17 seek [1] 56/16 seem [4] 67/14 74/1 77/10 83/24 seemed [11] 31/8 31/17 34/19 46/24 50/6 56/22 73/17 94/8 110/25 111/10 147/7 seems [4] 4/9 27/14 39/22 122/2 seen [10] 20/23 58/2 73/12 75/4 79/15 83/5 94/11 121/11 121/21 143/25 select [1] 32/19 selected [1] 17/8 selection [1] 1/21 selling [1] 120/9 send [5] 14/20 43/12 55/21 70/3 70/10 sending [2] 92/12 113/24 sense [3] 51/12 70/19 127/18 sensible [3] 67/5 67/14 68/9 sensitive [1] 117/12 sent [13] 8/24 9/4 19/21 25/13 67/17 70/1 70/7 70/9 94/9 99/2 108/12 113/16 118/2 sentence [5] 9/17 11/12 28/3 84/15 84/18 separate [3] 38/8 40/21 105/2 separately [1] 59/20 September [3] 1/1 58/24 126/7 sequence [2] 55/10 143/2 series [3] 84/21 86/8 105/11 serious [1] 103/3 seriously [1] 132/1 seriousness [1] 118/5 served [1] 89/16 server [1] 125/22 servers [5] 74/7 74/14 74/21 75/3 75/5 service [1] 135/1</p>	<p>Services [6] 10/23 13/15 15/17 15/25 32/5 32/6 serving [6] 130/7 130/19 130/23 131/18 136/21 142/13 session [7] 20/4 142/11 142/14 142/18 142/20 142/22 142/24 Session's [1] 26/19 sessions [5] 20/9 23/4 55/15 55/17 137/20 set [20] 1/13 7/14 14/5 19/24 22/8 25/10 25/18 28/11 51/16 53/22 60/1 105/6 105/10 114/3 129/8 129/13 142/13 143/12 145/23 145/24 sets [2] 54/7 125/11 settle [1] 137/21 settled [7] 65/2 127/21 130/15 131/19 132/7 132/20 142/23 settled/written [1] 127/21 settlement [1] 132/17 settlements [1] 130/18 settling [2] 129/10 130/16 seven [1] 81/23 several [3] 6/14 99/25 109/11 shall [1] 50/15 share [1] 47/16 shared [1] 92/3 she [11] 13/15 15/18 15/19 15/22 15/23 16/2 16/7 16/8 16/10 60/1 60/1 she's [1] 15/25 shook [1] 30/2 short [6] 7/14 22/19 50/20 91/16 143/5 147/10 shorter [1] 55/3 should [48] 4/23 8/19 10/11 21/10 22/12 23/14 32/13 34/17 43/18 51/15 52/23 53/1 53/2 65/14 67/11 76/23 77/1 78/6 78/8 80/21 81/2 100/23 101/6 101/7 102/8 106/19 108/19 109/1 109/20 110/20 112/11 112/18 113/4 115/10 115/22 116/11 116/23 126/20 131/20 132/10 132/23 133/15 133/18 134/10 140/10 144/9</p>	<p>146/4 149/16 shouldn't [9] 79/6 80/25 111/13 111/14 112/7 132/17 144/10 146/2 146/14 show [9] 5/19 20/22 22/12 45/9 98/20 104/14 107/19 112/9 138/8 showed [3] 18/6 92/6 92/9 showing [2] 92/11 108/11 shown [5] 25/15 28/7 28/9 67/1 137/11 shows [5] 9/15 52/25 98/16 119/20 120/19 side [2] 46/20 83/14 side's [1] 71/20 sight [3] 144/17 144/20 144/21 sign [3] 66/6 148/2 148/8 signed [4] 26/8 58/11 83/6 113/11 significant [3] 64/14 94/17 124/19 similar [5] 38/3 68/7 74/19 109/2 109/5 similarity [1] 139/3 Similarly [1] 45/12 simple [2] 10/15 38/1 simplified [1] 114/13 simply [1] 150/13 since [8] 12/11 21/22 33/12 67/3 71/4 77/14 90/1 106/7 single [4] 28/9 131/20 135/7 142/17 singular [1] 60/13 sir [10] 1/5 50/12 50/22 91/6 91/14 91/18 119/9 119/14 150/21 151/4 sits [1] 119/17 sitting [2] 57/2 144/2 situation [7] 31/8 31/19 109/20 126/23 130/22 146/6 147/8 six [2] 60/2 81/22 six years [1] 60/2 slightly [2] 21/8 147/3 slow [1] 96/12 small [2] 23/7 105/5 smart [1] 21/7 Smartpost [3] 20/4 21/8 23/8 snippet [1] 133/20 so [178] software [1] 11/5 solicitor [12] 18/10 30/22 31/3 34/11 34/20 36/16 38/19</p>	<p>39/20 43/10 51/12 64/23 71/9 solicitor's [1] 40/18 solicitors [6] 17/12 17/13 25/14 118/1 118/8 118/21 some [60] 1/14 1/19 3/23 6/18 12/4 14/22 15/15 16/9 18/1 18/10 18/11 18/13 23/3 37/7 40/13 43/2 49/3 51/9 51/16 54/8 55/17 55/19 56/21 57/1 60/20 64/5 64/5 65/22 66/9 67/12 71/2 75/1 75/2 75/9 78/21 79/8 79/21 86/18 88/17 89/21 90/22 91/7 93/6 94/21 99/11 101/5 101/21 105/1 105/5 106/20 106/25 113/23 114/17 117/18 130/21 135/2 137/9 139/3 142/2 149/2 somebody [16] 14/18 14/24 15/14 15/18 16/11 18/6 31/2 39/21 43/22 46/3 46/19 55/21 75/16 77/15 132/3 132/3 somebody's [1] 67/15 somehow [3] 31/11 55/6 57/11 someone [2] 68/11 141/5 something [40] 4/25 5/9 7/18 16/22 20/22 22/25 37/24 42/24 45/5 45/22 56/14 62/1 62/3 62/23 65/8 67/8 67/18 70/8 73/17 79/11 90/17 99/4 100/13 102/7 103/1 106/23 112/18 116/14 122/6 124/10 127/7 127/10 129/20 131/9 134/9 141/23 144/15 145/21 149/21 150/7 Sometime [1] 34/5 sometimes [6] 60/9 61/12 62/10 79/3 124/11 140/20 somewhat [1] 36/20 somewhere [3] 109/16 110/9 121/21 sooner [1] 80/7 sorry [12] 11/9 19/17 23/10 29/3 52/16 64/20 90/10 96/10 96/22 122/15 123/1 129/5 sort [34] 14/23 15/22 16/24 17/1 30/18 38/1</p>

S	130/14 130/16 131/19 132/13	128/11 147/14 149/2 149/20 150/1	substantial [2] 128/3 128/15	surprised [3] 30/14 73/16 74/4
sort... [28] 40/2 40/21 47/14 56/20 56/21 60/12 60/19 64/5 64/6 74/10 77/3 83/17 83/18 85/19 94/8 102/25 117/12 120/4 120/9 122/24 126/12 126/15 127/12 129/19 133/20 134/1 141/19 142/2	staff [7] 13/2 14/8 57/15 63/18 64/18 65/11 67/2	stock [15] 6/7 6/21 6/21 60/11 61/24 62/5 62/11 95/7 95/12 97/18 100/19 107/20 107/23 120/23 126/3	substantive [1] 100/4	suspect [1] 121/7
sorted [1] 132/10	stage [7] 16/24 37/15 93/10 95/19 118/4 132/25 146/8	stopping [4] 67/9 72/14 88/2 91/10	subtleties [1] 77/5	suspended [3] 133/9 142/18 142/20
sorts [1] 74/23	stages [1] 67/7	store [23] 19/11 19/16 20/14 22/6 41/10 53/25 68/25 72/3 72/8 72/11 72/12 73/8 73/19 76/14 122/5 122/10 125/18 127/21 143/8 143/10 144/17 144/20 144/22	successful [1] 84/11	suspense [22] 94/22 95/3 95/8 95/12 97/20 97/21 98/22 100/10 100/11 100/22 101/3 101/5 101/13 101/16 104/4 104/10 106/10 106/15 106/22 107/20 107/24 108/2
sounded [1] 50/8	stamp [10] 4/1 6/4 6/16 6/18 20/4 23/8 119/21 119/23 120/9 121/19	stores [2] 102/4 125/21	successfully [3] 130/12 131/24 136/18	suspense' [1] 100/15
speak [3] 30/22 36/15 85/15	stands [15] 6/6 6/10 6/11 6/12 6/18 6/22 6/23 7/9 119/24 120/2 120/4 120/13 120/23 120/23 121/1	story [1] 95/24	such [10] 29/16 33/16 75/23 89/7 101/10 109/20 118/24 139/9 150/16 150/17	suspension [1] 17/4
speaking [5] 31/3 35/2 43/6 74/22 78/3	stand [1] 43/6	straight [1] 35/19	sudden [1] 89/16	suspicious [2] 147/3 147/6
species [2] 40/1 72/16	standard [2] 73/22 99/18	strange [3] 46/24 46/25 147/7	sufficient [2] 108/14 118/5	swinging [1] 14/15
specific [9] 6/12 19/24 34/1 37/13 40/10 62/23 70/16 109/19 121/20	standing [2] 84/20 137/2	strangely [1] 30/19	suggest [5] 14/6 72/15 74/17 88/7 134/19	system [78] 9/15 9/22 10/10 10/20 10/21 11/3 11/8 13/7 14/8 15/9 30/17 33/12 39/14 40/5 47/9 47/10 49/16 51/21 52/10 52/14 52/18 52/23 53/2 53/3 53/6 53/9 56/12 56/21 57/1 57/6 57/18 60/17 66/6 66/25 67/4 67/24 68/3 68/8 72/9 73/11 74/24 80/6 80/18 81/4 82/12 82/13 82/20 82/21 83/14 84/4 84/5 84/25 97/3 102/6 128/2 128/5 128/9 128/11 128/12 128/16 130/3 133/14 134/10 134/14 137/1 139/16 139/22 140/15 140/19 148/2 148/5 148/14 148/16 148/18 148/20 148/24 149/18 149/22
specifically [8] 26/14 37/20 68/23 72/23 75/8 111/8 133/24 135/15	staple [1] 120/8	strict [2] 40/14 40/25	suggested [2] 33/15 75/21	systematic [1] 76/19
spell [1] 126/22	start [15] 1/12 1/14 12/22 17/9 20/5 21/9 21/13 21/13 21/22 27/2 28/10 28/13 36/1 52/19 113/9	Strictly [1] 78/3	suggesting [3] 22/17 22/20 67/10	systems [3] 8/24 26/5 83/11
spelling [1] 40/10	started [6] 43/21 48/6 61/20 83/8 103/20 138/6	strike [1] 147/2	suggestion [2] 67/19 85/8	
spelt [1] 49/15	starting [5] 51/13 59/18 61/20 68/24 74/20	strongly [1] 83/16	suggestions [2] 23/22 28/14	T
spending [1] 129/4	state [1] 140/16	struggling [1] 133/2	suggests [3] 28/18 72/7 77/15	table [7] 102/13 102/14 102/15 105/2 106/9 106/14 110/16
spent [7] 12/11 15/13 41/8 44/15 51/9 66/5 144/2	statement [31] 7/2 8/9 8/10 12/19 13/22 24/15 33/4 34/4 34/12 34/21 36/22 38/14 38/25 40/3 40/22 41/13 41/15 51/2 51/5 52/4 59/25 66/18 68/1 94/20 107/11 108/4 116/7 122/19 126/13 126/23 140/12	stuff [6] 24/5 56/7 58/4 75/7 114/17 139/25	sum [1] 107/11	tables [2] 102/10 104/1
split [1] 98/7	statements [5] 59/15 69/13 95/14 107/17 150/25	subject [2] 87/22 128/12	summarise [2] 18/9 23/7	take [12] 15/15 16/12 72/5 78/8 90/22 120/17 124/17 126/11 128/23 128/24 143/7 147/17
SPM [1] 141/6	stating [1] 13/19	submitted [7] 25/20 26/4 72/12 72/25 73/4 73/5 98/1	summarising [1] 29/19	taken [11] 14/9 24/17 33/13 48/2 98/24 112/21 114/9 132/10 138/20 148/17 148/24
spoke [2] 45/12 134/21	status [3] 70/13 70/15 70/17	subpostmaster [13] 13/10 55/24 111/23 120/11 128/20 129/1 130/5 131/10 131/14 133/8 140/21 141/6 141/12	summary [6] 44/15 92/8 95/2 96/4 97/12 99/13	taking [5] 10/4 58/20 94/5 94/16 137/2
spot [1] 42/23	step [1] 17/3	subpostmasters [21] 33/11 60/7 60/15 60/24 62/9 62/14 69/4 83/9 85/25 87/5 111/6 111/19 111/25 112/6 112/20 115/22 116/12 118/7 118/22 119/16 130/1	support [4] 32/6 103/8 140/1 147/18	talk [7] 15/9 15/11
spotted [1] 112/23	Stephen [8] 38/19 39/22 43/12 46/18 46/19 73/13 77/1 134/5	subsequent [6] 33/19 34/22 38/22 41/16 51/14 99/20	supporting [3] 25/20 30/17 139/16	
spreadsheet [5] 10/7 21/24 103/16 108/10 114/23	steps [3] 48/2 57/13 112/21	subsequently [12] 19/22 25/25 26/4 40/12 42/14 43/12 55/5 64/22 93/2 96/24 114/16 143/20	suppose [7] 24/17 30/23 31/5 39/20 72/18 72/22 128/25	
spreadsheets [2] 42/11 112/17	Steve [1] 108/12	subset [1] 6/24	supposed [3] 128/20 130/2 130/6	
Square [4] 45/13 45/18 49/18 49/22	still [16] 14/11 43/20 54/12 57/5 75/14 105/9 105/19 112/12 115/6 118/25 128/10	substance [1] 8/7	sure [38] 3/17 4/13 11/11 15/21 30/13 37/4 37/5 37/24 41/3 41/15 41/17 43/11 53/22 56/11 66/20 69/9 71/3 72/18 75/17 84/5 86/10 93/7 103/19 109/16 110/8 116/2 116/22 116/23 127/14 127/17 132/1 133/5 138/24 138/25 139/6 139/16 145/1 146/18	
SSC [38] 22/13 22/22 32/20 32/22 33/15 34/17 37/11 38/5 43/24 62/16 63/18 64/18 65/10 65/13 65/15 68/6 68/22 75/4 76/7 77/24 78/20 79/4 79/20 80/4 80/8 80/22 80/25 96/19 97/2 97/7 102/24 127/11 140/4 140/13 141/3 141/5 141/18 142/6			surely [3] 72/12 73/8 77/2	
stack [8] 99/24 127/20 129/8 129/21			surprise [3] 32/9 32/10 138/21	

T	50/9 56/14 90/1 116/24 119/6 that's [47] 4/3 4/22 5/18 5/21 9/4 9/7 11/9 11/11 11/12 13/8 18/20 19/3 22/20 24/20 26/24 27/21 28/17 36/13 50/12 54/19 58/9 63/6 70/19 73/2 74/11 81/22 83/6 87/2 87/11 87/19 92/8 102/23 103/4 118/9 120/8 122/6 124/10 127/22 131/9 134/24 136/8 138/20 139/20 141/21 145/21 146/3 146/4 their [15] 6/16 38/10 46/8 55/24 59/15 61/24 71/20 74/16 75/23 82/12 112/21 115/24 118/8 131/15 132/21 them [39] 5/16 6/13 13/10 25/3 28/16 34/21 42/12 42/13 42/19 44/5 47/16 47/23 48/16 48/18 48/18 56/10 58/3 59/15 59/17 62/14 75/1 75/3 80/3 86/15 86/20 94/21 96/25 106/25 108/12 108/14 111/14 112/9 112/24 112/24 114/11 126/24 129/10 133/10 138/13 themselves [1] 45/1 then [127] 2/24 3/22 4/12 4/15 5/15 5/22 5/25 6/4 8/23 9/2 10/7 10/12 10/15 11/6 11/15 12/17 13/18 13/21 15/8 16/11 18/1 18/25 19/6 21/25 23/2 25/17 29/7 29/10 31/9 34/18 34/25 34/25 35/13 35/15 35/18 39/7 41/13 42/8 43/13 49/11 49/14 51/18 52/20 53/3 53/4 53/8 55/13 58/7 58/10 60/6 61/12 62/22 63/19 63/24 65/14 68/12 68/18 70/7 76/16 77/2 83/14 83/17 86/3 86/4 89/4 94/11 95/24 96/5 97/14 98/17 99/3 99/8 99/10 99/23 100/1 100/3 103/4 105/6 105/10 105/13 106/25 107/6 107/21 107/23 108/5 108/22 109/14 109/23 113/15 114/17 114/21 115/1 116/17	117/25 121/9 122/6 123/8 123/16 123/21 126/1 128/1 128/14 129/10 130/11 130/13 130/23 131/9 131/18 131/21 132/7 132/20 132/24 134/8 136/19 136/22 138/12 138/20 139/25 142/18 142/21 143/22 145/18 146/20 147/2 148/9 149/25 150/3 there [188] there'd [2] 113/23 130/3 there's [16] 28/18 47/23 57/1 97/3 120/23 120/23 121/8 124/8 124/9 124/16 125/6 131/8 131/14 136/1 137/7 149/20 therefore [6] 30/3 51/4 75/23 83/6 97/9 137/13 these [38] 2/23 9/11 15/22 19/12 19/15 21/7 21/14 33/8 43/19 43/25 47/9 49/3 49/8 60/12 60/19 62/25 63/8 64/1 64/7 74/18 77/22 83/6 85/23 86/14 89/23 101/21 105/3 105/22 105/24 106/15 107/4 109/19 110/16 111/10 112/11 119/3 141/22 142/20 they [125] 4/23 4/25 5/9 6/13 6/14 6/20 8/16 8/17 8/22 9/15 9/17 9/19 10/13 10/15 10/19 11/3 11/4 12/24 16/12 16/22 20/24 21/14 22/25 23/22 25/2 27/19 28/20 28/21 30/4 32/12 35/12 35/17 35/18 37/10 38/8 38/11 43/20 44/1 44/3 44/8 44/8 44/14 46/7 47/11 47/21 49/7 49/14 53/4 56/8 56/13 61/23 62/15 64/13 65/21 67/16 71/4 71/6 74/8 75/10 75/17 79/3 79/4 79/4 79/5 79/7 79/20 80/14 80/16 80/18 82/11 83/2 83/2 83/10 83/14 83/21 84/6 84/10 85/17 93/24 95/8 95/18 97/17 97/18 98/7 99/3 100/8 100/11 106/19 107/21 107/22 107/23 108/1 108/2 108/18 108/19	109/7 109/8 111/12 111/13 116/17 116/21 120/6 123/11 125/17 127/17 129/10 130/2 131/21 131/22 132/15 132/17 132/18 132/19 132/21 132/24 133/23 140/5 140/8 140/10 140/22 141/3 141/17 142/10 143/2 146/3 they'd [5] 4/24 56/9 116/5 141/20 142/16 they're [5] 21/10 58/3 116/1 119/5 119/7 they've [4] 5/8 5/20 6/15 8/25 thing [6] 2/4 78/24 109/20 118/15 136/9 136/16 things [42] 2/2 2/23 6/19 11/7 12/15 29/1 40/24 47/8 50/9 52/5 52/7 53/18 53/19 55/2 56/5 56/10 56/16 57/12 57/13 58/15 62/25 64/7 74/23 76/2 77/3 83/6 85/4 93/6 98/8 105/13 117/20 119/3 129/11 132/13 135/15 138/12 138/19 139/10 139/23 142/15 146/16 151/2 think [131] 1/13 1/18 2/9 3/4 7/1 8/6 11/9 14/7 15/4 15/20 17/18 18/4 18/20 24/2 24/24 25/23 27/16 28/6 28/17 28/17 28/24 29/3 31/13 31/20 33/23 35/9 35/22 37/6 37/14 37/20 37/24 38/7 38/18 38/23 39/11 39/20 40/20 44/11 46/18 46/19 46/25 47/8 48/15 49/3 49/10 52/16 54/12 59/20 60/18 60/21 61/2 61/8 61/16 62/4 62/19 63/6 65/13 65/23 67/4 68/16 68/17 69/7 69/9 70/7 70/8 70/9 70/16 70/17 73/12 73/13 74/9 78/10 78/17 79/8 79/17 81/17 82/2 82/5 82/10 83/1 84/2 85/12 85/18 85/23 92/7 92/23 93/7 93/16 93/21 94/3 96/17 96/21 96/23 97/13 100/22 103/4 104/21 105/10 106/24 109/9 109/11 109/22 110/2 110/5 111/8 111/24	112/2 114/4 114/23 116/16 117/11 117/17 117/19 119/9 119/15 121/21 127/6 127/7 129/6 132/15 133/18 139/20 140/23 141/13 141/15 141/21 146/23 147/6 147/10 147/22 149/16 thinking [4] 47/12 81/6 81/7 144/6 thinks [1] 10/10 third [5] 17/24 64/19 64/20 78/12 83/11 Thirdly [1] 95/11 this [252] Thomas [2] 37/8 38/3 thorough [3] 1/9 93/4 93/10 thoroughly [2] 29/2 58/21 those [40] 8/25 9/5 10/17 14/5 25/9 28/21 29/1 33/24 38/2 39/25 49/23 52/6 55/14 56/16 56/19 57/13 62/4 62/16 62/18 67/16 75/4 77/3 86/6 87/5 91/2 92/25 100/21 105/16 108/3 116/3 118/19 120/3 135/15 138/3 142/25 143/1 147/18 149/3 150/18 151/2 though [6] 2/11 72/8 78/15 105/4 123/25 125/12 thought [27] 2/16 16/8 16/10 16/12 32/12 35/4 46/23 47/1 47/2 54/12 58/17 64/4 74/9 75/16 79/4 84/10 85/21 86/10 86/11 86/12 104/9 126/13 146/15 146/21 146/24 147/6 147/7 thoughts [2] 88/21 114/19 thousands [1] 9/21 three [19] 5/2 14/5 27/13 28/14 60/7 60/16 60/24 60/25 61/3 61/3 61/5 61/10 62/8 101/22 101/22 103/18 103/22 117/24 124/4 through [30] 6/14 12/6 17/21 17/22 18/4 19/7 22/15 34/24 35/20 36/25 41/2 59/25 78/1 79/11 80/20 80/25 81/1 84/15 85/2 118/1 129/1 129/4 129/19
----------	--	---	---	--

T	56/11 132/22 touch [1] 133/9 TP10 [1] 98/16 TPSC253 [1] 22/11 trace [2] 57/8 57/9 track [1] 71/14 tracking [15] 95/14 95/14 97/17 98/2 98/6 98/10 98/13 100/14 101/1 103/19 107/11 107/17 107/22 108/4 131/3 trail [4] 92/6 111/7 111/22 134/12 training [4] 39/23 40/2 40/6 65/24 transaction [22] 20/3 20/13 21/17 21/24 25/19 26/20 26/21 27/2 28/9 28/12 52/21 53/15 72/2 72/24 95/8 95/11 97/24 98/19 111/11 112/4 131/9 142/24 transactional [1] 26/2 transactions [48] 9/14 10/2 10/20 11/3 18/13 21/8 23/19 25/5 25/9 53/13 54/22 54/24 55/4 55/12 75/13 97/25 98/19 123/6 123/15 124/1 124/7 124/21 125/13 126/2 127/15 127/19 128/9 128/13 129/3 129/8 129/13 129/18 130/14 131/4 131/16 131/20 131/24 132/11 133/11 133/16 136/20 139/12 140/8 142/5 142/14 148/11 148/13 148/20 transferred [4] 97/20 98/17 107/12 142/20 transient [1] 75/1 trap [2] 109/2 109/5 tread [1] 117/14 treated [4] 67/22 69/2 69/21 118/5 trial [5] 41/8 43/21 58/5 138/2 145/14 trials [3] 33/23 33/24 69/16 tricky [1] 52/3 tried [8] 58/1 99/18 114/2 114/5 114/10 115/5 117/1 132/3 true [6] 54/19 60/18 63/6 87/2 140/24 147/19 try [13] 7/3 10/23 14/19 14/24 16/16 16/19 50/6 56/1 75/17	113/8 116/21 119/1 136/4 trying [10] 15/14 82/12 105/14 116/2 116/5 116/25 126/22 135/19 149/2 149/17 turn [8] 7/22 8/1 12/19 13/21 35/25 76/23 91/23 94/14 turned [4] 20/12 24/1 30/20 31/23 turns [1] 102/24 twice [1] 125/4 two [27] 2/17 2/18 8/22 17/16 20/9 21/2 28/16 28/19 34/9 39/25 49/20 53/10 53/19 56/16 57/12 66/14 66/15 79/20 81/11 101/22 107/11 107/13 109/13 120/19 124/4 125/11 150/24 two years [2] 34/9 81/11 two/three [1] 101/22 type [3] 78/11 78/19 118/15 types [2] 6/17 7/10	unfounded [1] 65/3 unhappy [1] 34/15 unique [1] 25/23 unit [6] 95/7 95/12 97/18 100/19 107/23 126/4 units [1] 107/20 unknown [5] 57/6 57/7 57/7 75/16 75/19 unless [3] 92/6 113/23 150/21 unlikely [6] 56/22 56/23 101/24 123/4 123/20 137/24 unplugging [2] 138/13 139/10 unresolved [1] 78/6 unsure [1] 50/9 unsuspended [1] 142/22 until [7] 35/4 64/8 73/12 91/11 93/16 97/2 151/9 unusable [1] 136/25 unusual [11] 13/25 14/16 89/9 118/23 134/17 135/8 135/19 136/3 137/4 137/16 141/22 up [71] 2/15 2/23 3/19 5/23 7/22 7/23 10/24 12/19 16/16 16/17 20/22 23/16 26/24 28/10 30/25 41/7 41/18 41/20 43/22 44/12 49/17 51/16 52/7 53/10 53/15 54/5 56/8 57/19 59/9 59/11 61/9 61/20 62/2 64/6 65/18 67/1 68/18 72/6 74/10 75/2 76/2 76/16 80/6 80/15 88/20 88/25 89/7 94/8 94/11 95/24 99/21 106/23 108/3 109/19 113/15 114/6 114/21 117/23 118/19 127/1 129/14 129/16 129/19 133/25 139/13 139/25 142/15 142/19 148/3 148/9 149/12 up' [1] 87/22 us [19] 1/18 2/6 14/21 30/3 32/18 35/22 36/21 52/13 61/14 65/18 66/9 81/1 81/2 81/3 82/23 89/16 117/25 124/17 136/10 use [5] 8/16 11/24 65/12 130/13 143/1 used [10] 2/9 9/5 12/13 42/16 42/19 44/19 95/13 121/22 132/2 143/3	useful [1] 91/10 user [6] 127/23 128/6 131/25 133/4 136/14 136/22 using [6] 7/6 58/8 130/10 131/3 136/21 142/12 usual [3] 113/21 115/20 118/10 usually [2] 8/16 84/10
			V	
			value [2] 26/22 101/7 vanished [2] 60/11 62/12 variable [1] 48/19 variables [1] 89/11 variety [1] 67/24 various [10] 11/7 33/22 42/11 43/13 48/4 56/5 56/10 69/16 105/13 134/3 vast [1] 49/6 verify [1] 149/1 version [2] 27/18 125/22 very [42] 1/8 22/19 24/18 29/3 31/9 31/16 31/18 32/11 35/18 37/14 38/1 38/8 39/9 43/2 48/19 50/25 51/14 56/22 57/16 61/17 63/8 64/10 65/14 67/2 67/14 73/16 78/14 81/15 91/2 91/14 91/21 117/12 118/23 119/5 119/7 128/15 146/5 147/8 150/24 151/1 151/2 151/4 vetted [1] 118/7 via [1] 12/9 view [14] 41/14 41/21 45/18 56/22 63/6 82/23 84/9 85/2 86/17 90/17 92/24 123/4 126/23 137/2 visible [2] 54/24 57/2	
			W	
			waiting [1] 108/13 want [10] 7/10 14/20 35/17 36/8 43/1 58/20 67/14 104/8 117/14 117/21 wanted [15] 14/19 14/21 20/11 20/12 41/3 51/23 57/21 98/8 105/9 110/23 115/11 116/17 116/21 117/19 147/3 wanting [3] 25/1 65/15 117/13	

W	20/17 27/17 30/23 37/14 38/9 52/18 57/18 68/12 70/9 74/3 75/13 75/16 83/5 83/13 84/7 89/14 89/16 90/11 93/7 101/15 107/17 121/7 122/7 122/9 123/22 124/15 124/16 125/7 126/11 126/14 130/1 132/11 133/6 133/20 137/2 139/21 140/3 141/12 146/24 147/9	23/15 23/19 31/2 35/16 36/15 43/25 45/2 47/4 47/5 47/11 48/12 48/25 52/22 53/12 54/20 55/11 55/15 55/16 56/17 69/20 69/22 71/4 76/8 78/23 82/13 82/19 82/21 85/9 87/5 88/3 91/8 92/3 92/16 92/24 96/20 104/19 104/20 108/13 109/1 112/19 128/6 130/24 132/8 137/12 138/11 145/1 149/9	29/14 why [30] 6/8 9/7 9/10 11/11 12/12 15/4 20/11 20/12 28/3 28/20 28/20 30/4 32/10 45/24 46/9 46/25 61/22 72/19 79/25 82/2 105/24 115/10 117/8 121/25 127/9 146/1 146/7 146/12 149/17 150/5 wide [3] 67/23 85/6 134/22 wider [4] 44/16 50/5 68/3 79/15 will [18] 5/19 8/25 9/3 9/4 9/7 9/10 10/23 89/22 105/3 108/22 114/15 115/12 125/20 126/2 129/10 131/21 134/12 147/10 Willen [1] 114/23 wind [1] 44/11 window [1] 66/13 Winn [5] 113/17 113/19 115/15 117/21 118/18 Winn's [2] 114/7 117/23 wiped [1] 121/17 wise [1] 16/23 wish [3] 134/6 149/19 149/19 wished [2] 28/1 79/19 within [13] 16/11 20/4 29/13 29/23 32/19 32/22 37/7 50/2 66/12 76/7 77/16 77/17 102/24 without [15] 49/20 55/19 58/21 78/13 79/25 80/1 80/4 109/15 111/14 114/14 129/4 129/9 129/17 130/15 136/23 WITN00170200 [2] 12/20 122/21 witness [51] 7/1 8/8 8/10 12/19 13/22 17/8 24/15 30/2 33/4 34/4 34/12 34/21 36/22 38/14 38/24 38/25 38/25 39/5 39/6 39/11 39/12 40/1 40/9 40/9 40/22 41/13 41/15 51/2 51/5 52/4 59/25 63/24 66/17 67/23 67/25 67/25 69/2 69/11 69/12 69/21 69/21 70/19 85/10 93/11 93/20 94/20 116/7 120/5 122/19 140/11 150/25	witnesses [5] 58/25 59/14 65/5 77/8 85/14 won't [1] 143/7 wonder [2] 91/8 150/7 wondering [1] 22/24 word [3] 2/9 24/19 61/12 work [16] 10/7 18/1 33/17 48/3 48/7 58/16 83/10 83/18 85/16 97/9 103/11 116/18 129/1 131/11 131/13 149/17 worked [5] 37/15 83/12 83/21 133/14 139/22 working [8] 9/16 42/3 57/17 83/8 118/19 133/11 136/1 142/17 workings [1] 45/10 worth [1] 126/22 would [141] 6/13 6/20 12/7 13/9 13/16 15/8 15/10 15/12 16/10 16/11 17/1 18/6 19/20 21/18 23/14 23/14 24/16 27/5 27/6 28/7 28/9 30/25 31/3 31/13 31/22 33/25 34/10 36/15 37/8 38/24 39/5 42/10 45/5 46/13 46/14 47/1 48/5 48/9 49/5 49/12 52/13 53/3 53/9 55/6 55/13 55/21 57/4 60/14 60/22 60/23 61/5 63/3 65/2 66/12 67/1 67/4 67/14 67/18 68/4 68/8 68/12 68/16 68/23 68/24 70/7 73/19 75/1 76/15 77/2 79/21 79/22 80/9 80/12 80/14 80/15 81/17 83/15 83/17 83/23 84/7 84/11 86/8 86/13 88/21 90/8 90/10 93/16 93/24 95/2 95/17 99/21 103/5 104/9 104/11 107/18 108/3 109/22 109/23 114/4 115/9 120/13 121/16 122/3 124/3 127/19 129/18 130/9 130/17 130/17 130/23 131/10 131/25 132/1 132/2 132/7 132/9 133/3 133/5 135/23 136/5 136/7 137/10 137/14 137/24 139/24 139/25 140/6 140/16 141/7 141/9 141/13 141/15 141/16 141/21 143/1 145/22 146/11
Wardle [1] 108/9 was [496] was PEAKs [1] 146/23 wash [1] 89/7 wasn't [34] 1/24 2/1 12/13 14/13 15/21 21/4 23/13 32/8 32/14 33/2 39/13 44/2 50/9 55/11 56/7 61/8 61/9 62/3 69/13 70/6 73/14 79/12 80/10 90/25 109/10 111/6 113/24 126/21 127/10 130/7 136/16 143/16 146/22 148/3 watch [1] 55/24 way [29] 12/23 14/5 14/15 15/2 23/3 23/18 34/23 44/25 46/22 55/19 55/21 56/14 58/7 62/7 65/17 68/15 75/2 75/11 90/19 101/5 113/22 117/18 133/19 136/2 136/4 141/8 141/10 141/16 148/19 WBON0000027 [1] 23/25 we [222] we'd [3] 43/19 94/10 112/16 we'll [2] 80/19 91/12 we're [15] 3/17 3/20 35/24 36/5 36/7 42/21 51/3 69/2 72/20 90/13 91/6 102/3 102/6 107/3 128/11 we've [14] 2/4 6/23 8/6 13/8 18/20 29/10 57/12 58/2 64/17 79/15 94/18 113/6 121/21 146/11 Wednesday [1] 1/1 week [28] 5/10 18/11 22/9 25/6 26/13 26/15 26/16 26/17 26/18 51/20 57/11 89/1 98/6 102/25 103/22 119/20 119/25 120/17 143/9 143/13 143/14 143/15 143/17 143/19 144/6 144/24 145/2 148/25 week's [1] 66/7 weekend [1] 118/3 weekly [3] 98/5 98/7 98/9 weeks [5] 18/11 26/13 43/21 77/23 124/4 welcome [1] 88/22 well [42] 15/10 15/19	Welsh [6] 10/22 12/9 13/14 13/20 15/16 17/2 went [9] 28/5 29/2 35/13 43/24 48/20 58/11 59/25 81/10 119/24 were [181] weren't [14] 2/2 46/5 46/21 49/23 62/25 86/20 86/25 95/18 103/9 111/11 130/10 139/18 146/22 150/6 what [181] what's [2] 36/10 79/1 whatever [10] 56/9 84/7 99/3 99/7 120/6 128/25 132/18 133/1 137/3 139/17 whatsoever [1] 10/21 when [54] 6/10 8/13 8/23 10/13 20/24 42/15 43/21 44/4 45/12 48/6 48/7 48/15 54/25 54/25 61/19 65/17 65/17 66/4 73/4 80/19 83/8 93/2 93/9 96/24 100/8 101/1 103/19 106/14 107/22 109/8 112/24 116/8 116/11 121/19 124/8 125/6 126/13 127/9 130/24 132/3 132/3 132/21 133/11 133/22 136/14 136/19 140/3 140/13 140/23 143/18 143/19 146/19 147/16 147/22 where [29] 25/14 30/14 41/20 47/7 49/4 49/8 51/17 56/25 57/20 61/22 65/5 68/7 78/5 79/19 80/5 80/21 84/2 84/3 114/1 124/22 127/24 130/22 131/8 136/13 140/9 141/2 141/5 141/8 149/5 whereby [1] 77/6 wherever [1] 99/22 whether [48] 17/25	which [94] 2/12 6/21 7/5 7/8 10/4 18/2 19/21 20/23 21/10 21/16 22/12 22/23 23/14 26/4 26/7 27/20 28/1 34/21 38/15 43/7 43/13 48/13 49/6 52/4 53/8 53/16 53/18 56/7 58/6 58/9 61/21 62/5 63/7 65/10 71/22 72/4 72/20 73/21 76/5 76/6 81/7 84/24 85/24 88/18 89/11 89/15 89/22 93/11 93/13 94/24 97/19 99/7 100/12 102/12 103/8 103/22 106/6 106/8 107/17 108/18 109/15 110/20 110/23 112/11 114/3 114/23 115/3 119/2 119/20 120/3 120/18 121/25 125/3 126/2 126/18 129/5 129/14 131/20 132/6 133/21 134/13 135/6 139/5 139/12 140/4 140/8 142/19 143/22 145/12 145/21 146/23 147/18 149/4 150/3 while [4] 66/20 81/4 122/11 131/18 who [31] 9/17 10/23 13/2 16/11 16/25 16/25 18/3 30/4 30/20 30/20 34/3 37/19 39/17 46/1 48/17 48/18 56/25 57/15 67/2 72/25 77/12 83/23 90/2 94/5 104/18 111/17 113/19 119/17 133/5 133/7 133/8 whoever [1] 142/12 whole [9] 3/1 22/6 39/14 100/6 107/25 127/4 142/13 143/16 144/3 whom [1] 43/9 whose [2] 20/18		

W
would... [4] 148/9
 148/9 148/19 150/1
wouldn't [13] 15/4
 27/22 60/18 70/20
 75/4 75/8 75/11 116/1
 120/12 135/22 137/17
 137/21 145/24
wrap [1] 64/6
wrap-up [1] 64/6
write [2] 24/20 114/5
writing [6] 66/15 69/5
 69/7 81/22 92/13
 98/25
written [13] 12/4 24/1
 53/25 64/9 75/3 75/10
 88/20 109/16 117/9
 117/10 126/6 127/21
 144/5
wrong [16] 14/14
 16/22 24/19 46/24
 47/5 47/8 55/4 55/9
 61/5 62/1 83/13 90/18
 117/13 134/20 141/6
 149/22
wrongly [1] 148/4
wrote [6] 22/7 27/18
 36/2 51/7 113/2
 146/20

Y
yeah [41] 9/9 11/14
 16/3 18/2 19/5 19/5
 19/13 23/6 23/24
 24/24 46/17 48/24
 48/24 49/7 49/8 54/6
 56/1 57/9 63/21 75/20
 75/25 81/25 81/25
 84/14 84/17 84/19
 87/7 87/13 88/10 95/1
 96/10 98/12 99/12
 99/14 104/15 117/16
 118/17 120/10 135/21
 137/24 141/1
year [6] 76/15 76/15
 89/14 101/18 104/18
 141/25
years [17] 33/20 34/9
 60/2 60/7 60/16 60/24
 61/3 62/8 66/16 70/12
 80/22 81/10 81/11
 89/10 89/16 95/15
 139/21
years' [2] 81/23
 139/21
yes [326]
yesterday [8] 4/4
 7/25 41/6 52/3 66/10
 78/1 79/11 79/18
you [541]
you'd [11] 5/11 16/14
 28/1 28/14 42/3 48/7
 116/7 120/13 130/11

137/15 146/9
you'll [1] 128/19
you're [9] 41/23
 65/17 77/25 81/19
 102/17 130/25 131/3
 131/18 138/23
you've [18] 7/13 7/18
 54/22 71/15 73/10
 82/24 94/20 99/24
 103/10 105/12 123/13
 131/2 131/17 136/6
 139/4 139/5 139/11
 151/1
your [89] 7/25 8/3 8/4
 8/8 8/10 10/6 11/12
 12/19 13/21 15/6
 16/14 16/17 17/23
 19/2 23/22 24/1 24/22
 29/10 32/2 32/25 33/4
 35/7 35/12 35/21
 36/22 38/14 41/14
 41/25 42/3 42/17 45/2
 45/3 45/9 45/17 45/18
 46/11 50/1 51/2 51/4
 54/20 63/10 65/9
 65/25 66/2 67/18
 68/21 74/5 76/1 76/18
 81/22 82/16 84/8 87/1
 87/6 87/8 87/11 88/22
 88/23 89/20 90/17
 91/25 92/8 94/6 94/20
 100/3 106/24 112/14
 114/22 116/7 118/14
 119/19 120/13 122/19
 123/8 123/13 126/13
 131/3 139/14 139/14
 140/11 143/9 144/9
 145/11 145/18 145/24
 146/7 146/10 146/14
 147/23
yourself [5] 17/22
 42/21 69/1 105/11
 126/13

Z
zero [10] 6/4 20/10
 53/18 101/6 119/20
 120/12 120/21 121/1
 121/15 121/24