

# OPUS 2

## INTERNATIONAL

Manchester Arena Inquests – PIR hearing

Day 1

September 6, 2019

Opus 2 International - Official Court Reporters

Phone: 0203 008 6619

Email: [transcripts@opus2.com](mailto:transcripts@opus2.com)

Website: <https://www.opus2.com>

1 Friday, 6 September 2019  
 2 (10.00 am)  
 3 SIR JOHN SAUNDERS: Yes, Mr Greaney.  
 4 Housekeeping  
 5 MR GREANEY: Sir, before even we identify the advocates for  
 6 the interested persons, we propose to deal with the  
 7 issue of reporting.  
 8 SIR JOHN SAUNDERS: Thank you.  
 9 MR GREANEY: The expedition of Hashem Abedi, the brother of  
 10 Salman Abedi, the bomber, has now been completed, as  
 11 everybody knows, and he is to be tried for the murder of  
 12 the 22 victims of the Manchester bombing, the attempted  
 13 murder of others and conspiracy to cause explosions.  
 14 Sir, like you, we as CTI are committed to ensuring  
 15 that nothing that occurs in the inquests or in the  
 16 preparation for them should threaten the fairness of  
 17 Hashem Abedi's trial. We are certain that all in this  
 18 room and all of those who are in Manchester will share  
 19 that commitment.  
 20 As we understand it, the trial of Hashem Abedi is  
 21 currently scheduled to start on 11 November, therefore  
 22 in two months. It follows that not only are the  
 23 proceedings against Hashem Abedi live within the meaning  
 24 of the Contempt of Court Act 1981, but also the trial is  
 25 imminent, and a number of matters flow from that,

1

1 a number of connected matters.  
 2 First, the press and others with an interest in this  
 3 case will be aware of the critical importance of not  
 4 reporting anything that may create a substantial risk  
 5 that the course of justice in the proceedings against  
 6 Hashem Abedi will be seriously impeded or prejudiced.  
 7 To do so would of course be a contempt of court, and  
 8 that is a matter of the utmost importance.  
 9 Second, the case against Hashem Abedi is being  
 10 managed in the terrorism cases list. The statutory bail  
 11 hearing took place before Mr Justice Sweeney on 22 July.  
 12 At that hearing an order postponing reporting of any  
 13 aspect of the proceedings against Hashem Abedi, save for  
 14 certain identified matters, was made pursuant to  
 15 section 4.2 of the Contempt of Court Act, and I will set  
 16 out what the identified matters are.  
 17 First, the identity of the court and the name of the  
 18 judge. Second, the name, age, home address and  
 19 occupation of the accused person. Third, the offence or  
 20 offences, or a summary of them, with which the accused  
 21 is charged. Fourth, the names of counsel and solicitors  
 22 engaged in the proceedings. Fifth, where the  
 23 proceedings are adjourned, as indeed they have been, the  
 24 date and place to which they are adjourned. Sixth, the  
 25 fact that Hashem Abedi has been remanded into custody.

2

1 Seventh, whether for the purpose of the proceedings  
 2 representation was provided to Hashem Abedi under the  
 3 applicable legislation. And eighth, the fact that  
 4 an application was to be made by the Crown for  
 5 Hashem Abedi to be interviewed but no details of the  
 6 section 22 application itself or the outcome of it.  
 7 Sir, we have circulated that order widely. Anyone  
 8 considering reporting anything about the case or  
 9 expressing a view on social media must refer to the  
 10 order and ensure that they comply with it.  
 11 The position of CTI, as it was at the hearing on  
 12 29 July, is that the order applies to anything said  
 13 during the course of any hearings in the inquest,  
 14 including the open portion of the hearing today. That  
 15 is to say, if anything is said today about the  
 16 proceedings against Hashem Abedi beyond the matters we  
 17 have just identified, the order of Mr Justice Sweeney  
 18 will bite.  
 19 Thirdly, sir, we are quite sure that the experienced  
 20 advocates instructed at the inquest and present here  
 21 today, both here at a location in London and in  
 22 Manchester, will take care in the submissions they make  
 23 orally at this hearing to say nothing that is capable of  
 24 prejudicing the fairness of Hashem Abedi's trial.  
 25 Nonetheless, it is appropriate to remind everyone of the

3

1 need to exercise particular caution in the circumstances  
 2 as they now exist.  
 3 Fourth and finally, it seems to us, sir, that some  
 4 limited steps do need to be taken now to ensure that no  
 5 reporting of the hearing creates any risk of prejudice  
 6 to the proceedings against Hashem Abedi. As a result,  
 7 sir, we submit that you should direct, as you directed  
 8 at the last hearing, that there should be no live  
 9 reporting, whether by Twitter or other social media or  
 10 otherwise, during the course of the hearing until you  
 11 indicate otherwise.  
 12 What we intend, sir, is that at the conclusion of  
 13 the oral submissions today, which ought not to take  
 14 long, no more than an hour, we anticipate, at that stage  
 15 there should be a short break, during which we can give  
 16 consideration in consultation with counsel to the Crown  
 17 Prosecution Service if necessary, but certainly in  
 18 consultation with counsel to GMP and the  
 19 Secretary of State, to whether anything has been said  
 20 that may create a risk of substantial prejudice to the  
 21 administration of justice in the proceedings against  
 22 Hashem Abedi.  
 23 If it has been, in our judgment, then the issue can  
 24 be raised and formally ruled upon by reference to the  
 25 test in section 4.2. If it has not, then the

4

1 proceedings can be reported without any substantial  
2 delay having occurred and without any material incursion  
3 into the important public interest in open justice .  
4 Sir , for the avoidance of doubt, your power to delay  
5 reporting for what will be no more than an hour or so  
6 arises under section 4.2 of the Contempt of Court Act,  
7 and if there is any challenge to that highly  
8 time-limited order, we will address you in further  
9 detail .

10 Sir , we hope that all of that will make sense and  
11 that everyone will understand why it's been necessary to  
12 express it in rather blunt terms. That is our  
13 invitation to you, sir .

14 SIR JOHN SAUNDERS: Thank you. Is there any member of the  
15 press here in court?

16 MR GREANEY: I don't believe so, sir , no.

17 SIR JOHN SAUNDERS: Is any member of the press present in  
18 Manchester?

19 MS CARTWRIGHT: There is, sir.

20 SIR JOHN SAUNDERS: Thank you. I will obviously listen to  
21 any representations on behalf of the press. So if  
22 anyone from the press wants to say anything about the  
23 proposed order delaying any reporting until we have  
24 actually finished the hearing, would you like to speak  
25 now?

5

1 MS CARTWRIGHT: Sir, it's been indicated that there are no  
2 representations from the press.

3 SIR JOHN SAUNDERS: Thank you.

4 Does any counsel, either here or in Manchester, wish  
5 to say anything about the proposed order?

6 MS CARTWRIGHT: There is nothing indicated in Manchester.

7 SIR JOHN SAUNDERS: Right. Is there anyone actually present  
8 on behalf of the Crown Prosecution Service?

9 MS CARTWRIGHT: Yes, there is, sir .

10 SIR JOHN SAUNDERS: Okay.

11 MS CARTWRIGHT: Catherine Selby is present in Manchester on  
12 behalf of the Crown Prosecution Service.

13 SIR JOHN SAUNDERS: Thank you very much.

14 It would be helpful if , as last time, you would  
15 indicate anything which in your view could prejudice the  
16 hearing, and that can happen at the end of the hearing  
17 in consultation with counsel. Thank you.

18 Right, introductions now.

19 MR GREANEY: Introduction time, sir , indeed.

20 Sir , as everyone will know, I am counsel to the  
21 inquest, together with Sophie Cartwright, who is in  
22 Manchester, and Alasdair Henderson, who is here with me  
23 at the courtroom in London.

24 Here in London, the Secretary of State for the  
25 Home Department is represented by Sir James Eadie

6

1 Queen's Counsel and Neil Sheldon Queen's Counsel.

2 The Assistant Chief Constable of Greater Manchester  
3 Police is represented by Alan Payne Queen's Counsel.

4 I know that interested persons are present and  
5 represented in Manchester, and may I invite  
6 Ms Cartwright to identify who they are, please.

7 SIR JOHN SAUNDERS: Thank you.

8 MS CARTWRIGHT: Sir, thank you.

9 In terms of those represented in Manchester, the  
10 families of John Atkinson, Kelly Brewster, Wendy Fawell,  
11 Megan Hurley, Mary Nell Jones, Angelika Klis ,  
12 Marcin Klis , Eilidh MacLeod, Elaine McIver, the mother  
13 of Martyn Hett, and the husband of Lisa Lees are  
14 represented John Cooper Queen's Counsel, Alex Jamieson,  
15 Alex di Francesco, instructed by Slater & Gordon.

16 The families of Alison Howe, Saffie Rose Roussos and  
17 Lisa Lees are represented by Mr Weatherby of  
18 Queen's Counsel, instructed by Broudie Jackson Canter.

19 Mr Weatherby is also today representing those also,  
20 the families of Sorrell Leczkowski and also the family  
21 of Philip Tron. They are represented by Terry Wilcox of  
22 Hudgell Solicitors , but Mr Weatherby is also looking  
23 after the interests of those families today.

24 The families of Olivia Page Campbell-Hardy, the  
25 husband of Michelle Kiss, the family of Jane Tweddle,

7

1 the family of Liam Curry, Chloe Rutherford, and the  
2 mother of Courtney Boyle are represented by  
3 Alex du Sautoy, instructed by Hogan Lovells.

4 Also the family of Georgina Callender is represented  
5 by Amanda Webster of Harrison Drury Solicitors.

6 In terms of the North West Ambulance Service, they  
7 are represented today by Martin English. In addition  
8 the University of Salford are represented by  
9 Joseph Cooper. SMG Europe Holdings Limited are  
10 represented by (inaudible: distorted) Williams.

11 The Crown Prosecution Service, as has already been  
12 indicated , are represented by Catherine Selby.

13 SIR JOHN SAUNDERS: Thank you very much.

14 MS CARTWRIGHT: Those are the representatives in Manchester.

15 SIR JOHN SAUNDERS: Ms Cartwright, could you also make sure  
16 that if for any reason you can't hear what's being said  
17 by anybody you tell us as soon as possible -- assuming  
18 we can hear you and --

19 MS CARTWRIGHT: Of course, sir.

20 SIR JOHN SAUNDERS: -- then we will do something about it.

21 Can I just indicate that I'm grateful for all the  
22 submissions in writing I have had. I have read the  
23 supplemental submissions. I have also considered again  
24 the original submissions made for the last hearing on  
25 the principles to be applied in PII, so thank you for

8

1 them.

2 MR GREANEY: Thank you very much, sir. May I deal formally

3 with what you have received.

4 The position is that at the pre-inquest review

5 hearing on 29 July, you made a series of directions

6 designed to ensure that the PII claims made by the

7 Secretary of State and by Greater Manchester Police were

8 determined at this hearing today. I can confirm that

9 you have received, sir -- and you yourself have

10 indicated that you have read -- the following.

11 The Secretary of State and GMP served open

12 certificates, as directed, by 12 August. The families

13 represented by Slater & Gordon and Broudie Jackson

14 Canter thereafter responded in writing. May I add that

15 their submissions have been of considerable value in

16 this process.

17 The Secretary of State and GMP served closed

18 certificates, supplemented by closed schedules, as

19 directed, by 12 August. The Secretary of State and GMP

20 served closed submissions, as directed, by 16 August.

21 Counsel to the inquest served closed submissions in

22 response, as directed, by 30 August, and the

23 Secretary of State and GMP served a rejoinder to the

24 closed submissions of counsel to the inquest, as

25 directed, by 4 September. Moreover, the

9

1 Secretary of State served open submissions on the same

2 day.

3 Sir, it follows, therefore, that there has been

4 complete compliance with your directions, and we are

5 grateful to all interested persons for their efforts to

6 ensure that that challenging timetable was complied

7 with.

8 As everyone will appreciate, there are limited

9 issues that we are able to address openly, given the

10 nature of the matters that we are going to be dealing

11 with today. But the issues on which we will make short

12 submissions are as follows: first, the PII principles;

13 second, the approach, sir, that we submit you should

14 adopt to this hearing; and, thirdly, the categories of

15 PII.

16 Sir, what we suggest is that we should make our

17 submission on each of those topics in turn. At the end

18 of each topic, we will invite submissions, if they wish

19 to make them, first of all from the Secretary of State,

20 secondly from Greater Manchester Police, thirdly from

21 the bereaved families, and fourthly from any other

22 interested person who wishes to make submissions on that

23 particular topic.

24 Submissions by MR GREANEY

25 MR GREANEY: Sir, first of all, therefore, the PII

10

1 principles.

2 The applicable legal principles are not in dispute

3 and were explained at length at the pre-inquest review

4 hearing on 29 July. We do not propose to repeat them

5 here today, save that we make plain that in our closed

6 submissions to you, sir, we made specific reference to

7 those principles and we emphasise that you should

8 determine the claims for PII in accordance with the four

9 questions posted by Lord Thomas in Mohamed.

10 Moreover, we further emphasised, as indeed we did on

11 29 July, that there is no doubt that there is a strong

12 public interest in bringing the material for which PII

13 has been claimed into the public domain. Sir, we make

14 clear that we will be inviting you to determine all of

15 the claims on that basis.

16 Beyond that, for obvious reasons, we are limited in

17 the extent to which we are able to make open submissions

18 on the detail of the claims for PII. However,

19 interested persons can be assured that the reasoning set

20 out in the closed certificates and schedules and closed

21 submissions of the Secretary of State and GMP has been

22 challenged and tested where appropriate.

23 Sir, that is all we propose to say about the PII

24 principles and we invite submissions from anyone else

25 that wishes to make submissions in the order that we

11

1 have suggested.

2 SIR JOHN SAUNDERS: Thank you. Sir James.

3 Submissions by SIR JAMES EADIE

4 SIR JAMES EADIE: Sir, it may be appropriate to make

5 slightly more detailed submissions in relation to the

6 PII principles, particularly given that this is the

7 first opportunity that the Secretary of State has had to

8 address that issue in public.

9 MS CARTWRIGHT: We are having difficulty hearing those

10 submissions.

11 (Pause)

12 That's better. We can now hear you, thank you.

13 SIR JAMES EADIE: Good, thank you, it was my fault: the

14 microphone light was red when it should have been green.

15 Sir, you will be considering in terms of the

16 principles essentially two things -- assuming of course

17 that the material in question is relevant, which is the

18 gateway condition for the application of public interest

19 immunity and for which there is no dispute there is

20 relevant information which this application relates to.

21 The two things that you will have to weigh are,

22 first of all, whether there exists a real risk of

23 serious damage to the public interest in the disclosure

24 of that material and, secondly, and if so, is the

25 countervailing public interest, which we fully accept,

12

1 as counsel to the inquest has just indicated is strong,  
2 in ensuring that the court or tribunal is able justly to  
3 perform its functions sufficient to outweigh that real  
4 risk of serious damage. That part of the test involves,  
5 in particular, considering the true relative importance  
6 of the material to the issues that arise.

7 So far as the structure of the analysis is  
8 concerned, there is no dispute, as we understand it,  
9 that the framework provided by the last Lord Chief  
10 Justice, Lord Thomas, in the Mohamed case, is the  
11 applicable framework to be provided.

12 So just to touch very briefly on those two elements  
13 of the public interest which you will have to balance,  
14 and I start with national security. The public interest  
15 in question here is the protection of national security,  
16 and you will need no reminding that national security is  
17 not an end in itself, its protection is not an end in  
18 itself. The protection of national security exists for  
19 the purpose of enabling those who have the  
20 responsibility to do so to seek better to protect the  
21 public against extremism and attacks. It is for that  
22 reason an extremely powerful consideration, as the  
23 courts have regularly and consistently acknowledged.

24 We are dealing here with the disclosure of  
25 information which would be of value to those who are

13

1 intent on doing the public harm or which would seriously  
2 impede the work of the security service in keeping the  
3 public safe. It is unsurprising perhaps that this  
4 principle should be in play in a context involving  
5 questions about the role and the actions of the security  
6 and intelligence agencies whose work is necessarily and  
7 for good reasons secret.

8 It is perhaps equally unsurprising that the courts  
9 have been both firm and clear about the approach if  
10 there is a real risk of serious damage to national  
11 security. We have given you in the first of our  
12 skeleton arguments for the purpose of this hearing, at  
13 paragraph 25(b), the flavour of it from Lord Morris in  
14 particular in the Conway decision. If you have that to  
15 hand, it's behind tab 21 in the bundle.

16 SIR JOHN SAUNDERS: Thank you.

17 SIR JAMES EADIE: It's one of many similar statements, but  
18 you will see at the top of page 11, within  
19 paragraph 25(a) it should be, there is a quotation from  
20 Lord Morris in Conway v Rimmer in which he said:

21 "If a responsible Minister stated that production of  
22 a document would jeopardise public safety, it is  
23 inconceivable that any court would make an order for its  
24 production. The desirability of refusing production  
25 would heavily outweigh the desirability of requiring

14

1 it."

2 We have also given you, if you are in that skeleton  
3 still, to the same effect, in paragraph 30, the  
4 statement again of the House of Lords in the Wiley case,  
5 where the House said:

6 "As a general rule, the harm to the public interest  
7 of the disclosure of the whole or part of a document  
8 dealing with defence or national security or diplomatic  
9 secrets will be self-evident and will preclude  
10 disclosure."

11 So that is the essential approach that the courts  
12 have taken when something as serious as national  
13 security is engaged.

14 The courts have been equally clear about how the  
15 court or a coroner should approach questions as to  
16 whether or not there is a real risk of serious damage to  
17 national security and the answer to that is that they  
18 have regard to two particular matters.

19 The first particular matter is that ministers have  
20 access to expertise and experience that the courts  
21 simply don't share. We are dealing with judgement calls  
22 about the existence, the nature and the extent of damage  
23 to, for example, the ability to protect the public if  
24 the material in question is released into the public  
25 domain.

15

1 Secondly, they have regard to the constitutional  
2 principles that exist about separation of powers. The  
3 significance of separation of powers and democratic  
4 accountability in this context are that there are  
5 certain decisions which it is right and proper that the  
6 political arm of government and/or the legislative arm  
7 of government should have responsibility for and  
8 judgements about whether national security will be  
9 detrimentally affected is a paradigm example of those.  
10 Again in the skeleton at paragraph 27 we have given you  
11 a quotation which makes that clear.

12 So those two linked but slightly different matters  
13 both lead effectively to the same conclusion in terms of  
14 the court's approach or the approach that a coroner  
15 should take in an inquest. The court will respect the  
16 judgements about the existence, nature and extent of  
17 risk to national security, save in the most exceptional  
18 case. As you have seen from the case law, if there is  
19 a real risk of disclosure, that disclosure would harm  
20 national security, then it is virtually inconceivable,  
21 we submit, that the court would order disclosure.

22 I should add that, of course, national security  
23 considerations, whether that hurdle is surmounted of  
24 a real risk of serious damage to the public interest or  
25 to national security, that consideration can of course

16

1 only be fully explained in closed, for obvious reason.  
 2 My submission in open and in closed is that you have  
 3 before you in this application a cogent, carefully  
 4 reasoned and appropriately expert-based assessment about  
 5 the real risk of serious damage to national security  
 6 that might flow from the disclosure of the information,  
 7 the subject of this claim, and that that should be  
 8 accepted.

9 Sir, that's the national security side of the  
 10 balance. On the other side of the balance is the  
 11 relative importance of the material. As I say, I have  
 12 already indicated that, according to the case law, if  
 13 a real risk of national security damage is made out,  
 14 then it would be wholly exceptional for material to be  
 15 disclosed. But this other aspect of the public interest  
 16 focuses on the interest of the judicial process, or the  
 17 coronial process here, being able to decide the issues  
 18 before it on the basis of all evidence that might bear  
 19 on the issues that you are considering, this often comes  
 20 down to a balance in which the ministerial view is of  
 21 significance but not of the same weight as the  
 22 assessment of the national security issues.

23 It often comes down to a balance which pays  
 24 particular regard to the relative importance of the  
 25 material, and that's why consideration is given and has

17

1 been given in this case to the possibility of trying to  
 2 take steps to avoid the damage to national security by,  
 3 for example, producing a summary or a gist of the  
 4 material, and that exercise has been carefully gone  
 5 through.

6 Sir, the application of those principles here --  
 7 three short points, if I may, in open only. First,  
 8 there is in the considered assessment of the Minister on  
 9 advice a real risk of serious damage to national  
 10 security for the reasons fully set out in the closed  
 11 certificate.

12 The categories of damage are well established and  
 13 there is, as I have said, a cogent and detailed  
 14 explanation as to how they are engaged, and there is no  
 15 basis for departing from that.

16 National security, if you will, is at the very top  
 17 of the tree, the hierarchy of importance in terms of the  
 18 protection of the public and therefore the public  
 19 interest in the protection of material.

20 Secondly, the most careful consideration has been  
 21 given as to whether more could be put into the public  
 22 domain, including gisting in ways that might deal with  
 23 the risks to national security, and the conclusion,  
 24 which we understand is shared by all concerned, is that  
 25 no more can be provided into open without creating such

18

1 a risk of damage.

2 Thirdly, the material is of undoubted and accepted  
 3 significance to the issues surrounding the actions of  
 4 the security service and the issues you will have to  
 5 consider, and we accept that. But, as I indicated, the  
 6 case law makes clear that it is the national security  
 7 consideration which holds the whip hand in that balance,  
 8 and it might be thought to be unsurprising that that is  
 9 so, for this reason if for no other: facilitating the  
 10 possibility of learning lessons from the past is  
 11 undoubtedly a good thing, but the purpose of learning  
 12 lessons is to seek better to protect the public in  
 13 future, and it cannot be right that the price to be paid  
 14 for that possibility is the very thing that the learning  
 15 of lessons is designed to avoid, namely putting the  
 16 public at risk through the revelation of this sort of  
 17 material.

18 Sir, the consequence of these three points, we  
 19 submit, is that if public interest immunity was the only  
 20 game in town, the material would have to be excluded  
 21 from consideration and could not inform the inquest's  
 22 examination of this set of issues. That is because  
 23 public interest immunity is an exclusionary principle:  
 24 it prevents the court or tribunal or inquest from  
 25 examining the material which is covered by the

19

1 application. Our submission is that there is a very  
 2 clear answer to the public interest immunity application  
 3 because of the established risk of a real and serious  
 4 risk of damage to national security and that that trumps  
 5 for the good reason that I indicated.

6 The only potential area of controversy on the open  
 7 submissions, or the most substantial area of potential  
 8 controversy on the open submissions, is what  
 9 significance the possibility of a public inquiry should  
 10 play in your PII analysis. Our primary case, as you  
 11 will have discerned and you have seen from the written  
 12 submissions, is that you don't need to engage in that  
 13 area of potentially interesting analytical dispute and  
 14 you don't need to do so because there is a clear answer,  
 15 even if one strips out the possibility of a public  
 16 inquiry from the PII analysis.

17 SIR JOHN SAUNDERS: Sorry, just let me say, the possibility  
 18 of a public inquiry is always available in any inquest  
 19 like this. What may be unique about this case is that  
 20 the Secretary of State has actually indicated that if  
 21 there was a request she would grant it.

22 So the significance of that is a novel point.  
 23 Whether one needs to engage with it, I agree, may not be  
 24 necessary, but it's quite interesting to think about.

25 SIR JAMES EADIE: Yes. Sir, if I may, I'm going to make

20

1 some very brief submissions on that issue, but  
 2 I entirely agree with you and accept that this is  
 3 unusual and perhaps unique because the stage has already  
 4 been reached where the powers that be have given  
 5 consideration to that issue.

6 A public inquiry cannot be ordered by a coroner --

7 SIR JOHN SAUNDERS: No.

8 SIR JAMES EADIE: -- it needs to be ordered by the  
 9 Secretary of State, and the Secretary of State's view  
 10 has been sought and has been given on that issue.

11 But the concern of course, just to address the issue  
 12 of principle very briefly -- and we say unnecessarily  
 13 for the reasons I have given -- but the concern arises  
 14 here precisely because in an inquest it is not possible  
 15 to receive or take into account material covered by PII.  
 16 So an inquest can't do that.

17 So what effect does that have and does the existence  
 18 of a possible public inquiry have on the balance? On  
 19 the national security side of the balance, in  
 20 circumstances where a public inquiry is a viable and  
 21 possible option, there is of course a clear way in which  
 22 the damage to national security can be managed, and that  
 23 is because it is possible to protect national security  
 24 not merely by not ordering its disclosure to the world  
 25 with all the risks that that entails, but by having

21

1 a closed process, and a closed process which is not  
 2 possible in an inquest is of course possible under the  
 3 Inquiries Act in a public inquiry if one is ordered.

4 So on the national security side of the balance,  
 5 there can be -- if you take the public inquiry  
 6 possibility into account -- no justification whatever  
 7 for creating a risk of damage to national security,  
 8 where that is made out, for all the reasons I've given.

9 But it might be thought that the key difference lies  
 10 on the other side of the balance, the other side of the  
 11 scales. In an inquest, as I've said, PII operates as  
 12 an exclusionary principle. In other words, if it is  
 13 upheld, as it should be in almost all cases where  
 14 a serious national security case is made out, the  
 15 consideration of the role of the agencies cannot and  
 16 will not include consideration of the material covered  
 17 by PII.

18 But there is a way of avoiding that: inquests cannot  
 19 consider evidence in closed because there is no  
 20 statutory power to do so, but a public inquiry  
 21 specifically and expressly can do so, and the advantage  
 22 of that is obvious. In this way, ie in a closed hearing  
 23 in a public inquiry, the coroner can consider all of the  
 24 material, so the conduct of the agencies can be examined  
 25 in full and, if lessons are to be learned, they can be

22

1 learned on recommendations from a judge who has seen all  
 2 of the evidence. That could not be done if important  
 3 parts of the picture were simply unavailable to the  
 4 coroner. We submit that those features, therefore, are  
 5 plainly relevant to the PII balance and it is entirely  
 6 artificial to leave them out of account. That is  
 7 precisely because, as you indicated, here the  
 8 Home Secretary has indicated a willingness to convert  
 9 and functions can be performed just as well in a public  
 10 inquiry as they could be in an inquest.

11 There is no possibility, in truth, of disclosure  
 12 actually being made, whatever the approach, unless and  
 13 until the public inquiry aspect has been factored in.  
 14 No one would ever get to the stage where the material  
 15 actually had to be released into the public domain until  
 16 that had been taken into account. That is obviously  
 17 right because to do so would be to take the real risk of  
 18 damage and make it real when it's entirely unnecessary  
 19 to do so, given the public inquiry possibility.

20 So no one is suggesting or could suggest that the  
 21 material actually has to be disclosed. That result in  
 22 theory, that possibility of opening up, not in the  
 23 national security case where the case law is clear, but  
 24 it opens up in theory because if you ignore the public  
 25 inquiry side, the other side of the balance may require

23

1 or may acquire more weight. No doubt in theory the  
 2 exclusion of material is less conducive to a just  
 3 disposal than the coroner being able to fulfil precisely  
 4 the same function, but with access to the material.

5 However, if that difference in the test really made  
 6 a difference in a particular case -- and it would be  
 7 very, very rare indeed because of all the indications  
 8 I have given on how PII works anyway -- but if it did  
 9 make a difference, if that difference between exclusion  
 10 and taking into account truly affected the balance, it  
 11 would, we submit, be entirely artificial to ignore the  
 12 key fact that there is no need for that engine, as it  
 13 were, to drive a greater willingness to take a national  
 14 security risk and there is no need to do so and there is  
 15 no engine for doing so precisely because the public  
 16 inquiry option is available.

17 What that demonstrates, particularly once one  
 18 accepts that there could be no possibility of actual  
 19 disclosure ever being made until the public inquiry  
 20 possibility had been factored in and for as long as it  
 21 was live, what that demonstrates is that the whole  
 22 debate in truth becomes highly artificial because it is  
 23 in essence a difference between you as the coroner  
 24 saying, "Well, I refuse the application for PII", in  
 25 theory, "but of course there is no disclosure pending

24

1 PII, so then I go on to the second stage in theory  
2 before that eventuality occurs of considering the public  
3 inquiry possibility”, or you just say, “Well, that’s  
4 a totally pointless analytical exercise, it is much  
5 better to cut to the real event, which is: how should  
6 these things be balanced now that I know that that  
7 possibility is a real and live one because the  
8 Home Secretary has so indicated?”

9 It may in the end just be a question of fineness of  
10 that analytical approach, particularly, as I say, once  
11 one takes into account the fact that no court, tribunal  
12 or coroner would ever require, or could ever require,  
13 the actual provision of the secret material into the  
14 public domain, with all the risks to national security  
15 associated with it, without having first properly  
16 considered the possibility of the public inquiry  
17 alternatives which would protect everything, both your  
18 ability to see all the material, decide all the issues,  
19 determine what lessons should be learned in the light of  
20 the full picture, and the management properly of the  
21 national security risks that would flow from any such  
22 public revelation.

23 Sir, that’s what we say about the principles. I am  
24 sorry it’s taken a little while on that last  
25 possibility, but it’s at least of theoretical interest.

25

1 SIR JOHN SAUNDERS: Can you just help me: I have read all  
2 the cases which are relevant, to which I have been  
3 helpfully referred. There are statements of high  
4 principle from very important and distinguished judges,  
5 and they are not always, it seems to me, entirely  
6 consistent with one another, which may depend on which  
7 result they’re going to come to in the end.

8 SIR JAMES EADIE: Yes.

9 SIR JOHN SAUNDERS: But the balance would appear to be  
10 between the public interest in disclosure and having  
11 an open inquest and the families knowing exactly what  
12 has happened, which they would not know with a public  
13 inquiry, and if I also say that I’m not going to  
14 disclose material. So on the one hand you have had the  
15 quotation of the cases you have referred me to, and then  
16 on the other hand you have cases where the courts have  
17 referred to not waving a white flag, and then Lord Judge  
18 made a similar statement in perhaps more elegant terms  
19 as well.

20 It seems to me, trying to work out how I exercise  
21 that balance, that the answer may be this -- and I would  
22 be helped by your comments on this: the Minister has  
23 access to expert advice, and on the basis of the expert  
24 advice, she will make her decision as to where the  
25 balance lies, which she has done. For me to not wave

26

1 a white flag to that, it requires me to make a similar  
2 analysis. So it seems to me that the way it works in  
3 practice -- which is actually what’s quite important to  
4 me -- is that I am given the assistance of the security  
5 services and the police as to what the implications may  
6 be for national security if I were to allow disclosure  
7 of things, which are not always immediately obvious --  
8 and anyone who has had to write an open judgment to SIAC  
9 to find MI5 excluding large amounts of it because they  
10 hadn’t actually realised what use could be made of it is  
11 not always apparent.

12 Then having been given that expertise and the help  
13 of that as to the implications, I then have to make my  
14 own mind up about national security, otherwise I am  
15 simply waving a white flag.

16 SIR JAMES EADIE: Yes. I think there are two stages, if  
17 I may say so, and the courts in the case law draw  
18 a distinction between these two stages. The first stage  
19 is: what respect or weight do you accord to that  
20 expertise when assessing what the risk to national  
21 security is? Does it exist? What is its extent? What  
22 is its nature?

23 In relation to that first part, in other words -- it  
24 has always been my left hand, I don’t know why -- but  
25 left-hand side of that balance, the national security

27

1 side, the case law is absolutely consistent, which is  
2 that it would be extraordinarily rare for a court to  
3 disagree with the expert assessment that has been made  
4 about national security.

5 The “extraordinarily rare”, the introduction of that  
6 phrase and that test indicates that you are right, that  
7 ultimately it is a matter for the coroner or for the  
8 court to make that assessment, but it does so  
9 recognising all of those features and recognising  
10 therefore the true exceptionality of any form of  
11 disagreement.

12 I mean, if, for example, there was an absolutely  
13 irrational factor that had been introduced, I decide  
14 there is a national security risk because someone has  
15 red hair, that’s the sort of thing that we’re talking  
16 about. We’re not talking about the court making its own  
17 view about what the reasonable judgement should be on  
18 national security. It would have to be an error of  
19 an obvious and flagrant kind to reflect the fact that  
20 the respect that is to be accorded to those sorts of  
21 assessments, on both of the bases I indicated, the  
22 expertise and competence that is brought to that  
23 assessment, which is available to government and lies in  
24 the hands of government, and also because  
25 institutionally it’s right that the responsibility for

28

1 those decisions should lie there. So a very, very broad  
2 margin of respect in relation to that.

3 The second stage is how ultimately, having done  
4 that, you weigh the balance. Again, that is of course  
5 a matter for you. But there the margin of respect is  
6 narrower. So you take the national security analysis  
7 with its very broad margin for the State; That's one  
8 thing. The second stage: how do you balance it? The  
9 reason it is narrower, that margin, at the second stage,  
10 the ultimate balancing stage, is because the court or  
11 you, the coroner, in this situation is the expert on  
12 matters of justice and what the government says about  
13 that, therefore, and how that should be weighed against  
14 the risk to national security, of course, attracts  
15 a lesser degree of respect.

16 The case law is clear that there is still some, it  
17 is still of significant interest to the court, if I can  
18 put it that way, that the Secretary of State, having  
19 carefully considered all of these things and  
20 particularly in the Secretary of State has demonstrated  
21 that he or she is entirely alive to those open justice  
22 principles and how they should work, there is still  
23 a respect to be accorded but it's significantly narrower  
24 and therefore your margin, your room for disagreement,  
25 as it were, is commensurately larger.

29

1 SIR JOHN SAUNDERS: I follow that, thank you.

2 Clearly when we go into closed -- and I am not  
3 saying any of this will arise, but it's interesting to  
4 set the parameters -- you explain to me why a particular  
5 piece of information would damage national security if  
6 it was suppose exposed to the public. And I will  
7 question you about that and you give me your answers,  
8 and at the end of it I say "Well, I simply cannot see,  
9 even with the help of all your expert information given  
10 to you by the security services, I cannot see how that  
11 would affect national security"; you are saying that  
12 maybe in the weight I give to it that affects it, but it  
13 would not be open to me to say, "Well, actually that  
14 doesn't -- I just don't agree it affects national  
15 security"?

16 SIR JAMES EADIE: I'm not sure I need to go that far or do  
17 go that far. If in theory your conclusion was that the  
18 submission in closed is going to be that you don't get  
19 anywhere near that because of the careful and considered  
20 nature of the process, but you are asking the question  
21 of principle: if you were to conclude that there was  
22 simply no basis, no proper basis, then you are much  
23 closer to, if not within, the territory where I accept,  
24 despite the breadth of the margin, a court or a coroner  
25 could intervene because that would be effectively

30

1 irrationality .

2 SIR JOHN SAUNDERS: So it's a large margin of appreciation,  
3 but that doesn't mean waving the white flag?

4 SIR JAMES EADIE: That doesn't mean waving the white flag  
5 and it precisely doesn't mean waving the white flag  
6 because the function is ultimately still yours. What we  
7 are debating is the question of how you should approach  
8 that function.

9 So white flag, certainly, one never puts the white  
10 flag up because the function is yours. The question is  
11 how you go about it. As I say, there is a distinction  
12 between the way you approach those two tests.

13 SIR JOHN SAUNDERS: Just finally, the question of the public  
14 inquiry and the balance, where that affects in the  
15 balance, there are two aspects to it. There is the  
16 Litvinenko case -- if I pronounce him rightly -- where  
17 one is saying ... as I understand the sequence, they  
18 made a decision about any responsibility by the -- for  
19 the British Government in which the coroner said, "I'm  
20 not prepared to uphold your PII", then he considers the  
21 Russian aspect and said, "Actually I just can't consider  
22 this case in view of the Russian aspect in an inquest  
23 because of the information which has to be heard". Then  
24 the court said the coroner made a mistake because having  
25 done that he should have gone back to his original

31

1 decision, when he refused PII in the first case, and  
2 reconsidered it in the light of the fact that he was  
3 going to have to have a public inquiry in any event.

4 So I can understand that if -- it's all  
5 hypothetical -- I were to reach a conclusion at one  
6 stage in your arguments as to PII, well, if that's going  
7 to be excluded and I agree it has to be excluded, then  
8 we really can't deal with that and an inquest just  
9 wouldn't be a sufficient way of inquiring, then it may  
10 be possible for me to say, well, actually when I'm  
11 coming to balance the other factors, disclosure against  
12 non-disclosure, the fact that I have already decided  
13 it's going to be a public inquiry affects that balance.  
14 I can understand that.

15 I'm less with you, I think, on the question of:  
16 right from the outset, before you have looked at the  
17 actual material, you are saying that's something which  
18 will be in the balance in any event about PII. It's not  
19 in any of the cases, perhaps because it's never arisen  
20 before in these terms, and the cases talk about the  
21 balance between public justice and public security.

22 SIR JAMES EADIE: Yes. I mean, the public justice and  
23 public security: the public justice aspect is present in  
24 both the PII aspect and in any public inquiry.

25 SIR JOHN SAUNDERS: Yes.

32

1 SIR JAMES EADIE: So that's, as it were -- I haven't  
 2 addressed you on that because that is as it were a  
 3 common feature and neutral and doesn't really bear on  
 4 this issue.  
 5 SIR JOHN SAUNDERS: Except it means the relatives do not  
 6 hear, and nor does the public, the actual evidence which  
 7 goes to the possible inquiry in reaching its conclusion.  
 8 SIR JAMES EADIE: Of course and I don't deny it as a  
 9 relevant factor --  
 10 SIR JOHN SAUNDERS: No, okay -- sorry, that's my  
 11 misunderstanding.  
 12 SIR JAMES EADIE: -- but my point is a slightly different  
 13 one which is that it is relevant whether it's a public  
 14 inquiry or whether it's an inquest with a PII  
 15 application, you would have to consider that issue, and  
 16 it is a factor of real weight. We don't seek to deny in  
 17 any shape or form the importance of the families being  
 18 able to hear as much as humanly possible, so it is  
 19 relevant to both and so it doesn't really bear on this  
 20 distinction, whilst recognising that it's of course  
 21 an important factor in relation to both types of  
 22 analysis.  
 23 As I say, I don't want to go back over the  
 24 submissions I have made --  
 25 SIR JOHN SAUNDERS: Sorry, I have distracted you somewhat

33

1 with something which may be entirely hypothetical.  
 2 SIR JAMES EADIE: -- about the public inquiry side.  
 3 But ultimately I think the point one reaches is to  
 4 ask: would any conclusion, if it was just pure PII and  
 5 stripping out for the purpose of argument any  
 6 possibility of a public inquiry, would there be any  
 7 possibility in that scenario of the material actually  
 8 being disclosed --  
 9 SIR JOHN SAUNDERS: Yes, I understand.  
 10 SIR JAMES EADIE: -- before a public inquiry has been  
 11 considered.  
 12 And if the answer to that is no, one can of course  
 13 see the logical purity of saying, well, is it cart  
 14 before the horse, which I think was counsel to the  
 15 inquest's thinking in one part of the skeleton argument.  
 16 One can see the logical coherence of that, but our point  
 17 is a slightly muckier one, if I can put it that way,  
 18 which is that it doesn't actually make a lot of sense to  
 19 do it that way and even if you did do it that way, and  
 20 frankly even if you did do it that way, once you  
 21 acknowledged that the material wouldn't be disclosed, it  
 22 just makes more sense to think about the thing in the  
 23 round. If you want to break it down analytically into  
 24 those two stages then you reach the same result by a  
 25 different route.

34

1 SIR JOHN SAUNDERS: Thank you. I am grateful.  
 2 Mr Payne.  
 3 Submissions by MR PAYNE  
 4 MR PAYNE: Sir, I only have three short points to make.  
 5 SIR JOHN SAUNDERS: Thank you.  
 6 MR PAYNE: First of all, GMP endorse the approach in terms  
 7 of legal principles outlined by Sir James.  
 8 The second point is that GMP wants to provide  
 9 a reassurance that officers with particular expertise in  
 10 counter-terrorism work have given the most careful  
 11 consideration to the extent to which information and  
 12 material which form the subject of the PII claims could  
 13 be made public, and the conclusions they have reached in  
 14 relation to that material, they are empathic that the  
 15 information simply cannot be disclosed without  
 16 jeopardising security.  
 17 The third point GMP wish to make is that in  
 18 considering the PII claims very significant weight has  
 19 been attached to the importance and the public interest  
 20 in the relevant material being disclosed in order to  
 21 enable a full and thorough investigation.  
 22 So I just wanted to make that publicly clear, that  
 23 great care has been taken before making the PII claims.  
 24 SIR JOHN SAUNDERS: Okay, thank you very much.  
 25 Right, over to Manchester. I hope that between you

35

1 you have agreed who will go first and who will wish to  
 2 speak.  
 3 Submissions by MR COOPER  
 4 MR COOPER: Sir, may I rise -- and I hope I will be picked  
 5 up on the equipment -- to make submissions on behalf of  
 6 our client --  
 7 SIR JOHN SAUNDERS: Thank you, Mr Cooper, we can all hear  
 8 you.  
 9 MR COOPER: -- thank you -- as far as what we have heard  
 10 today and indeed with helpful documentation provided to  
 11 us in advance.  
 12 Sir, can I just ask you, because I'm going to refer  
 13 briefly to two of our documents that we have already  
 14 filed with you -- the first is our substantive written  
 15 submission on the point dated 19 July 2019, and in  
 16 particular at paragraphs beginning at 5.3. Hopefully  
 17 the court can reference our document of 19 July --  
 18 SIR JOHN SAUNDERS: Yes, I have it this year.  
 19 MR COOPER: -- of this year.  
 20 SIR JOHN SAUNDERS: It's divider 13 in our bundle.  
 21 MR COOPER: Yes, indeed, thank you.  
 22 If I can ask the court to turn to the paragraphs  
 23 beginning at 5.3, which is where I will be referring in  
 24 a moment --  
 25 SIR JOHN SAUNDERS: Could you say again where in the

36

1 document?  
 2 MR COOPER: Yes. 5.3, under the heading "Principle".  
 3 Paragraph 5.3, under the heading "Principle".  
 4 MR GREANEY: Sir, we think this is probably tab 15 of your  
 5 bundle.  
 6 SIR JOHN SAUNDERS: Thank you. I'm in the wrong tab,  
 7 thank you.  
 8 MR COOPER: Tab 15, sir, I'm helpfully reminded.  
 9 SIR JOHN SAUNDERS: Can you turn up the volume at all?  
 10 (Pause)  
 11 It's been done at our end. That's fine. You are  
 12 quite a long way from the mic, which I think makes it  
 13 more difficult to hear you.  
 14 MR COOPER: Shall I sit down?  
 15 (Pause)  
 16 Is that better for everyone?  
 17 SIR JOHN SAUNDERS: Yes.  
 18 MR COOPER: I will carry on, then.  
 19 So that document, please, which is tab 15, beginning  
 20 with "Principle" -- and can I also ask, sir, as you have  
 21 already indicated, you have had an opportunity of  
 22 reading our supplementary documents dated 22 August of  
 23 this year.  
 24 SIR JOHN SAUNDERS: I have read it, thank you.  
 25 MR COOPER: Tab 16. Thank you.

1 As far as that supplementary submission is  
 2 concerned, we have nothing to add to it, and simply ask  
 3 the court to take into account what is helpful to them  
 4 when considering this matter.  
 5 Save to say this, and to potentially say the  
 6 obvious: the difficulty, of course, that I have, those  
 7 I represent have, is that we have not seen any material,  
 8 quite properly so, and we are making generic and general  
 9 submissions about the principles without any knowledge  
 10 or information about the precise material that you will  
 11 be considering.  
 12 That said, putting to one side now the supplementary  
 13 document, can I take you to the document at tab 15, the  
 14 document I have indicated starting with "Principle".  
 15 Can I immediately preface what we submit on this  
 16 matter and highlight on this matter by taking issue with  
 17 the approach that counsel for the Secretary of State  
 18 seems to be having towards the importance of public  
 19 consideration of this matter.  
 20 This is not -- and I may have misunderstood him --  
 21 highly artificial. This is not a theoretical matter as  
 22 far as those I represent are concerned and it is  
 23 certainly not artificial or pointless for us to argue  
 24 that this important and tragic matter and the  
 25 circumstances pertaining to it should be made as

1 importantly as possible within the public domain.  
 2 Nothing that my learned friend has submitted today  
 3 or in his documentation deals with that important point.  
 4 Our answer to my learned friend for the  
 5 Secretary of State really, sir, is succinctly developed  
 6 in our paragraphs 5.3 to 5.5 of our submission.  
 7 SIR JOHN SAUNDERS: Mr Cooper, forgive me for interrupting  
 8 you, but I think it's fair to say that in the  
 9 Secretary of State's certificate she makes entirely  
 10 clear the desirability and public interest in these  
 11 things being made public if they possibly can. So  
 12 I think it is acknowledged by the Secretary of State  
 13 there.  
 14 MR COOPER: I am grateful for that. It was just the tone of  
 15 my learned friend's submissions today on behalf of the  
 16 Secretary of State didn't, in our submission,  
 17 particularly mirror the approach being taken by the  
 18 Secretary of State.  
 19 SIR JOHN SAUNDERS: Okay.  
 20 MR COOPER: But I am reassured that his client is perhaps  
 21 very, very clear on the importance that you, sir, have  
 22 helpfully reminded me of.  
 23 We certainly submit that the tone of the submissions  
 24 by the Secretary of State's counsel today on the matter  
 25 is such that we need on behalf of the families to

1 emphasise that he is wrong to underplay, as we submit he  
 2 has done, the importance of public consideration of the  
 3 events surrounding this tragic matter. And we indicate  
 4 that our paragraphs 5.3 and 5.5 assist you, sir,  
 5 particularly on that point.  
 6 In preface to us reminding respectfully the court of  
 7 those issues, we say this: that whether it be an inquest  
 8 or it be an inquiry, the issue of material relating to  
 9 PII being reasonably within the public domain is not  
 10 met, whatever the situation, whether it be inquest or  
 11 inquiry closed session.  
 12 My learned friend for the Secretary of State  
 13 indicated to you that the issues relating, as he put it,  
 14 to public justice and public security were a matter he  
 15 has only briefly referred you to. We, sir, refer you to  
 16 it in a little more depth.  
 17 Although counsel for the Secretary of State is of  
 18 the view that it only merits a brief reference, we  
 19 submit on behalf of those we represent here in  
 20 Manchester that it is requiring far more of  
 21 a significant consideration by you.  
 22 We refer you to the passage we cite in paragraph 5.3  
 23 in Amin -- and forgive me, I know you have it in front  
 24 of you, but we submit it is relevant for those six or  
 25 seven lines to be read into the record of our argument.

1 Paragraph 31:  
2 "In this country [said the court, Lord Bingham],  
3 effect has been given to the duty to investigate for  
4 centuries by requiring such deaths to be publicly  
5 investigated [publicly, we emphasise] before  
6 an independent judicial tribunal with an opportunity for  
7 relatives of the deceased to participate."

8 Of course, sir, we add in passing, if my learned  
9 friend for the Secretary of State's submission holds  
10 sway with you, the element of participation by those we  
11 represent will be severely hampered. We read on:

12 "The purposes of such an investigation are clear: to  
13 ensure so far as possible that the full facts are  
14 brought to light; that culpable and discreditable  
15 conduct is exposed and brought to public notification;  
16 the suspension of deliberate wrongdoing if unjustified  
17 is allayed."

18 As we have submitted, sir, in our paragraph 5.4,  
19 these features should, and we anticipate will, be the  
20 touchstone for you, sir, in your court to approach this  
21 issue. Where there is a tragic event, as we put in our  
22 document, such as the outrageous bombing of  
23 Manchester Arena -- and that is under consideration --  
24 the demands for transparency are at their highest.

25 We add this: they are particularly at their highest,

41

1 when we know, as do you, sir, from already the  
2 documentation we have seen either served upon us or more  
3 particularly already in the public domain by means of  
4 reports from a number of eminent and learned people,  
5 that heavy criticism will be sought to be made during  
6 the course of this hearing of both the security services  
7 and the police.

8 We, sir, emphasise this point because this is of  
9 particular importance, we respectfully submit, when one  
10 considers the applications or the submissions being made  
11 by my learned friend for the Secretary of State and my  
12 learned friend for the police. This is not simply  
13 a matter which is subsidiary to the investigation before  
14 you, we submit. If I may use such an expression in the  
15 context of this jurisdiction, the culpability of both  
16 the security services and the police are, in our  
17 submission, open to severe analysis with potential  
18 severe and critical consequences.

19 So, sir, when you consider, as we know you will, the  
20 material that will be placed before you and the  
21 arguments that will be placed before you in closed  
22 session, we submit that you should bear very firmly in  
23 mind that the very people who are seeking to restrict  
24 this material being placed in the public domain -- and  
25 particularly in the domain of the bereaved families --

42

1 the people making the applications to restrict the  
2 provision of this material in the public domain are the  
3 very people who could be potentially severely criticised  
4 and the ramifications of that are significant.

5 This is the background --

6 SIR JOHN SAUNDERS: Mr Cooper, I think you slightly  
7 overstate your case. The application is being made by  
8 the Secretary of State, not by the security service,  
9 although of course she will be influenced by what they  
10 have to say, and she has exercised her independent  
11 judgement, she has assured the court of that, and no  
12 doubt that assurance can be taken.

13 MR COOPER: Of course, sir, and if I have been misunderstood  
14 in the tenor of this submission, then of course your  
15 correction is well received. But our submission  
16 maintains on the point that the effect of any submission  
17 made by the police, and by counsel for the  
18 Secretary of State, to restrict this information in the  
19 public domain is still effectively emanating, or at  
20 least implicitly emanating, from the very group of  
21 people or organisations which, if I can put it simply  
22 and inelegantly, are potentially in the firing line as  
23 far as this potential hearing is concerned.

24 So that is our first substantive submission, that we  
25 submit that neither an inquest nor a public inquiry can

43

1 address the problem of material being placed in the  
2 public domain and particularly in the domain of the  
3 bereaved families.

4 Our concerns are heightened, of course, as I've  
5 indicated, by the background to the matters that we  
6 already know of which potentially may have led or at  
7 least in part have led to how this tragedy developed.

8 Can I move on to a further point as far as our  
9 submissions on the PII issue is concerned: we are  
10 acutely aware of the balance that you must maintain  
11 between the submission of public interest and open  
12 justice or public justice and national security, but the  
13 effect, if we may put it this way, sir, with the  
14 greatest of respect to my learned friend for the  
15 Secretary of State, is that if his submissions are  
16 right, whilst tacitly accepting there is a balance for  
17 you to exercise, he virtually submits that there is very  
18 little leeway for you to exercise that approach.

19 We submit that is wrong. We submit and refer to our  
20 document, again beginning at paragraph 5.10 of our  
21 document, that the balancing issue addressed,  
22 particularly by Lord Judge, is important to you and has  
23 in fact, again with the greatest of respect to my  
24 learned friend for the Secretary of State, somewhat  
25 been -- how shall I put it? -- undervalued in its

44

1 importance as far as your exercise is concerned.  
 2 I would like to refer to that again because, as we  
 3 submit in our paragraph 10, we submit this --I am not  
 4 going to read the whole thing, just the first few lines:  
 5 "As the court will be aware, where a PII certificate  
 6 has been provided, the views of the responsible Minister  
 7 are entitled to proper judicial respect but they are not  
 8 determinative."

9 We cite Binyam Mohamed as far as that is concerned.  
 10 We go on, further down our document, and refer to  
 11 the balancing issues articulated by Lord Judge, and he  
 12 said this at paragraph 44:

13 "As the executive, not the judiciary, is responsible  
 14 for national security and public protection and safety  
 15 from terrorist activity, the judiciary defers to it on  
 16 these issues unless it is acting unlawfully or in the  
 17 context of litigation the court concludes that the claim  
 18 by the executive for public interest immunity is not  
 19 justified. Self-evidently that is not a decision to be  
 20 taken lightly."

21 Can I refer you -- and I am not going to read the  
 22 whole paragraph, you have it there, sir, at  
 23 paragraph 46, which we have already cited, but let me if  
 24 I may emphasise the last sentence:

25 "However [said Lord Judge], although in the context

45

1 of public safety it is axiomatic that his views are  
 2 entitled to the utmost respect [that is the Minister]  
 3 they cannot command the unquestioning acquiescence of  
 4 the court. We submit --"

5 SIR JOHN SAUNDERS: Mr Cooper, that is the phrase I had in  
 6 mind when I was mentioning it to Sir James previously  
 7 which, apart from the waving the white flag, is the  
 8 other relevant quotation, I think, from the authorities.

9 MR COOPER: Thank you, sir, and I don't feel that I need  
 10 further to address you on that, save perhaps to question  
 11 my learned friend for the Secretary of State's  
 12 description of national security "holding the whip  
 13 hand". We submit on behalf of the families that's  
 14 an unfortunate expression, but nonetheless that is the  
 15 expression that's used.

16 We submit national security do not hold the whip  
 17 hand. They have certain submissions to make and certain  
 18 powerful observations to put to you, but we submit in  
 19 the context of a tragedy and an outrageous action like  
 20 this where, as we have already submitted, there is cause  
 21 to believe that there could be culpability on behalf of  
 22 the security services and indeed the police, certainly  
 23 naming but two and maybe others, that whip hand should  
 24 not be overplayed.

25 The importance in a very unusual case like this,

46

1 sir, as you have recognised, is that the importance of  
 2 public dissemination, public availability and open  
 3 justice is not a mere subsidiary aspect to these  
 4 hearings. One could, unfortunately, get the impression  
 5 from the submissions we have heard so far that, that  
 6 compared to national security, the issue of open justice  
 7 and open publicity, so far as it can be effective, not  
 8 only to the public at large (inaudible: distorted)  
 9 particularly in a circumstance such as this  
 10 dissemination, but particularly, we submit, on behalf of  
 11 the families.

12 They expressly (inaudible: distorted) unless there  
 13 is an absolute and exceptional reason why it should not  
 14 be so, and we are, if I may say so, sir, reassured by  
 15 your observations that you will require, as we interpret  
 16 it, good reason, good articulated reason as to precisely  
 17 why national security is going to be affected. Because  
 18 there are many in this court, including myself, if I may  
 19 say so, that are involved in cases, particularly  
 20 inquests, where national security has been cited,  
 21 particularly in military related inquests, and when  
 22 probing or an in-depth analysis of that assertion is  
 23 made, it is not national security that is the concern  
 24 but national humiliation in the sense of the prevention,  
 25 be it tacitly or not, of material being placed before

47

1 the court which is embarrassing to the services, and we  
 2 submit that when the services are providing their legal  
 3 advisers with advice, whatever expertise they have,  
 4 there should be very hard analysis of what they say, and  
 5 we are reassured to hear that they are not simply going  
 6 to be taken on their word.

7 We are reassured by my learned friend Mr Payne, in  
 8 his short submissions to you, that officers "of  
 9 considerable expertise on (inaudible: distorted) of  
 10 their view".

11 With great respect to Mr Payne, and indeed to the  
 12 officers of considerable expertise, that is simply not  
 13 good enough for those we represent. They are going to  
 14 have to do -- and this is a matter for you -- far better  
 15 than that as far as we are concerned to satisfy the  
 16 families that open justice and open accountability is  
 17 being tendered in this case.

18 We finally submit this: that we ask you to take into  
 19 account when considering any PII application on the  
 20 material what material is already in the public domain.  
 21 There is a considerable amount of material already in  
 22 the public domain concerning the behaviour, decisions  
 23 and approaches of the security services and the police.  
 24 You sir, as we have, have read a number of reports, as  
 25 I have indicated, from a number of eminent and respected

48

1 people which indicate severe, if we may say so,  
2 shortcomings. We would ask you, sir, during your  
3 exercise to ensure that any PII application being made  
4 is not covering, or at least partly covering, matters  
5 already in the public domain through these reports and  
6 other investigative tools that have already been made  
7 available.

8 In that respect, one could be as inelegant as  
9 perhaps the use of "whip hand" is by saying the horse  
10 has already bolted on that, and any public interest  
11 immunity application is simply too late if that horse  
12 has bolted.

13 Sir, those are our submissions on behalf of those we  
14 represent. They are, as you will anticipate, very  
15 important submissions as far as our clients are  
16 concerned, as it goes to the very, very root of how they  
17 see these proceedings both contributing to their  
18 understanding of what happened to their loved ones, but  
19 also to a wider national understanding of this terrible  
20 tragedy.

21 SIR JOHN SAUNDERS: Mr Cooper, I'm grateful. Can I just ask  
22 you this: I am, of course, aware of Lord Anderson's  
23 reports. I am of course aware of and have read the  
24 report from the Security And Intelligence Committee of  
25 the House of Commons. If there are other documents of

49

1 which we are not aware which contain material which  
2 putting into the public domain things for which PII may  
3 be claimed, it would obviously be very material for us  
4 to know it, and please do inform counsel to the inquiry  
5 if there are other documents because it would help us  
6 enormously.

7 MR COOPER: I certainly will, sir. Was one of the documents  
8 referred to the document authored by Dominic Grieve?

9 SIR JOHN SAUNDERS: That's the Security And Intelligence  
10 Committee report, yes.

11 MR COOPER: Thank you.

12 We will check whether there are any others in the  
13 short time we have here. I am grateful.

14 SIR JOHN SAUNDERS: Thank you very much. Thank you,  
15 Mr Cooper.

16 Mr Weatherby.

17 Submissions by MR WEATHERBY

18 MR WEATHERBY: Yes, thank you very much. I will be as brief  
19 and try not to duplicate as much as I can.

20 Can I start by picking up the scene: no one here  
21 must lose sight of open justice and that the way to  
22 achieve justice down the ages has been by shining  
23 a light on the full extent of the material involved in  
24 an outrage such as this, or in any case where in  
25 particular public authorities and the State may be due

50

1 criticism or may be accountable or may have contributed  
2 in some way to deaths that have been caused in  
3 an outrage such as this. So that should be our starting  
4 point and I urge everybody to keep that front and  
5 central.

6 In terms of the legal principles involved in the  
7 public interest immunity issues here, they were  
8 comprehensively set out by counsel to the inquiry, and  
9 we have all made submissions on them, and I don't  
10 believe there is much distance in terms of the  
11 principles involved. What we are considering here in  
12 the discussions today are the application of those  
13 principle.

14 On the one hand we have the Secretary of State's  
15 representatives urging maximum restraint in terms of  
16 disclosure and on the other hand we, on behalf of the  
17 families, are saying that we fear that the applications  
18 are cast very wide indeed and we urge you to take a very  
19 anxious approach to the scrutiny of these matters.

20 SIR JOHN SAUNDERS: I'm sorry to interrupt you,

21 Mr Weatherby -- this is really as a matter of  
22 reassurance: obviously you haven't seen the closed  
23 submissions and I think it's been outlined by counsel to  
24 the inquiry as to how they were done -- so specific  
25 questions were asked for material, and in relation to

51

1 each particular item public interest immunity has been  
2 claimed on a particular basis. So I can assure you that  
3 I will be looking at individual claims in detail rather  
4 than some broad brush approach which, if you are not  
5 part of the procedure, which you can't be, you may be  
6 worried that it is.

7 MR WEATHERBY: Yes. I'm grateful, and particularly those  
8 that we represent are grateful for that indication.

9 Sir James makes an important point about the  
10 separation of powers, and he is, with respect, entirely  
11 correct that the Secretary of State is in a position  
12 where this court ought to give her due deference with  
13 respect to the matters that are under consideration  
14 here, and that of course she has access, as has been  
15 said, to advice and experience in terms of matters  
16 relating to national security.

17 However, the constitutional corollary of that point  
18 is one that you have, with respect, also made this  
19 morning, although not in these terms, but the  
20 constitutional corollary of that is that due deference  
21 does not mean that it's a trump card to play in front of  
22 the court, to say that your position as an independent  
23 judicial officer is irrelevant and therefore in  
24 discussing the constitutional principle here of the  
25 separation of powers it's equally important to put in

52

1 terms that the independent approach that you must apply  
2 must give due deference but only due deference to the  
3 views of the security services through the  
4 Secretary of State.

5 In terms of the application of the principles, we  
6 have raised in written submissions, both on 19 July,  
7 tab 13, and 23 August, tab 14 -- and I know my learned  
8 friend has also done so -- we have raised a number of  
9 factual matters. Of course, I say this for those  
10 listening rather than for the court, if I may, but  
11 of course we haven't got access to the closed schedule  
12 so we do not know what the material that is sought not  
13 to be disclosed is. In fact, we don't even know its  
14 category, what kind of material it is, and we don't know  
15 its extent, whether it's ten documents or 10,000  
16 documents.

17 So what we have tried to do to assist the court is  
18 to point up matters that appear from the open material,  
19 open source, from the parliamentary and other reports  
20 and from respectable media reporting, a whole series of  
21 issues that don't appear to have been addressed within  
22 the security services and police statements that were  
23 submitted, and therefore we anticipate some or all of  
24 which are part of the public interest immunity  
25 applications.

53

1 In so pointing up those issues, first of all, we say  
2 they're in no way exclusive, but we say that there is  
3 a fear from the families that the public interest  
4 immunity applications are being cast too wide and also  
5 that, at the end of the applications, when they have  
6 been determined, the amount of material that will  
7 actually fall to be considered in open hearings will be  
8 of a very small amount, with respect to the central  
9 issues regarding the security services and the  
10 counter-terrorism policing issues.

11 I'm not going to repeat the submissions we put in  
12 writing, but I do want to just raise a couple of  
13 examples from them -- and I stress that of course we  
14 don't know what is in the closed material, so I'm not  
15 speaking from a position of knowledge here. But if, as  
16 is possible from open source materials, there are  
17 systematic systems issues between counter-terrorism  
18 policing and the security services, for example, which  
19 have been raised within public interest immunity  
20 applications, then of course you will give the most  
21 careful consideration to those.

22 But the considerations that are given to such  
23 systems, potential systems failings issues, will be  
24 different, radically different to another application  
25 where, for example, you might be considering the

54

1 existence or identity of an informer, just to take  
2 an example.

3 Therefore we urge the court to be very slow to  
4 entertain applications which deal with systems matters  
5 which frankly are unlikely to have a real impact on  
6 national security matters.

7 There are a whole variety of other issues, and  
8 I will only just point up a couple of them, but also we  
9 submit the court should be slow to allow applications  
10 regarding material which says that there is an interest  
11 in members of the Abedi family --

12 SIR JOHN SAUNDERS: Can you just stop for a minute,  
13 Mr Weatherby. Obviously everything you are saying is  
14 being transcribed. I know there is some difficulty --  
15 everyone now and again you and Mr Cooper seem to get  
16 further away from the mic, which makes it more difficult  
17 and we get a bit of distortion. Thank you. That's  
18 better.

19 MR WEATHERBY: You want me to get further away or closer?

20 SIR JOHN SAUNDERS: I think where you are now is fine, so  
21 just keep there and don't move, please!

22 MR WEATHERBY: I am labouring with a very heavy cold so it  
23 may be my voice rather than the distortion.

24 Picking up the last point, if there is material on  
25 the PII applications which, for example, relates to

55

1 interests that the security services or  
2 counter-terrorism policing were showing in members of  
3 the Abedi family to other subjects of interest,  
4 for example, or in other investigations prior to the  
5 bombing, then that material is already out there and  
6 therefore the interest in keeping it undisclosed is  
7 again relatively less than it might be if it was,  
8 for example, a covert method or some information which  
9 wasn't in fact known to others.

10 Indeed, contact, if there is such material -- and  
11 I stress that I don't know whether there is or not --  
12 contact between the security services or  
13 counter-terrorism policing and the Abedi family  
14 themselves prior to the bombing is obviously something  
15 of a significant matter. For our part, we see that the  
16 balance in terms of national security or the potential  
17 for risk of national security in such a case would be  
18 radically different to that which attaches to other  
19 material.

20 So therefore through those simple examples and the  
21 others that are provided in writing, what we say is that  
22 although the legal principles here are relatively well  
23 settled, we urge you to take an anxious scrutiny  
24 approach and not follow what appears to be the result of  
25 the Secretary of State's submissions that the court

56

1 should rely most heavily on the views of the security  
 2 services themselves.  
 3 So that's all I want to add in terms of the  
 4 application of the principles to the public interest  
 5 immunity applications that you are hearing today.  
 6 Can I pick up on one point which has not been  
 7 mentioned orally this morning, but has been mentioned in  
 8 writing, and that's with respect to what you ought to  
 9 consider today. I think the Secretary of State has  
 10 perhaps misunderstood a submission I made in writing,  
 11 and I am pleased to say that we appear to be as one on  
 12 this, that in our submission it's a matter of case  
 13 management for you whether you consider the entirety of  
 14 the public interest immunity applications. We only  
 15 addressed that issue because of the police submission  
 16 that you may only think it proper to consider the  
 17 central matters and then if you find that an inquest  
 18 process becomes impossible, then you don't need to  
 19 consider the other applications.  
 20 As a matter of law, we think that that approach  
 21 would be appropriate but equally there is no objection  
 22 at all in law or otherwise to the position that  
 23 I understand CTI are proposing and the  
 24 Secretary of State is agreeing with, that it's a case  
 25 management decision for you.

57

1 SIR JOHN SAUNDERS: Okay. Can I just reassure you somewhat  
 2 on that.  
 3 I am going to hear the submissions, I will make my  
 4 decisions on the submissions I hear and the material  
 5 I see. Whether I will have had time in the near future  
 6 to actually give a detailed judgment, a detailed closed  
 7 judgment dealing with every aspect of it may be more  
 8 difficult for me to guarantee. I note that in the  
 9 London Bridge case, for example, the Chief Coroner  
 10 actually gave his detailed closed submissions, I think,  
 11 some time after the inquest had finished.  
 12 I will do the best I can to deal with both an open  
 13 judgment, which clearly you must have in the near  
 14 future, and also a closed judgment. But the amount of  
 15 detail may have to differ on the closed judgment,  
 16 depending on the amount of time and access to material  
 17 that I have. You will understand, I am afraid, I don't  
 18 just take home all these documents, I have to go  
 19 somewhere in order to read them.  
 20 MR WEATHERBY: Yes, and of course I reiterate we don't know  
 21 whether there are ten documents or 10,000, so we don't  
 22 know what the extent of the work is. All I am  
 23 indicating is that we don't think there is any issue of  
 24 law involved as to whether you consider sufficient of  
 25 the issues to determine that the inquest process cannot

58

1 go any further.  
 2 If that is a position you (inaudible: distorted) or  
 3 indeed whether you consider them all. The time, with  
 4 respect -- and I hope you don't view this as too  
 5 flippant -- but the time it takes you to do the closed  
 6 judgment may not be of the greatest import to those of  
 7 us representing the families (inaudible: distorted).  
 8 SIR JOHN SAUNDERS: I do understand that.  
 9 MR WEATHERBY: Yes. I just raised it because there are  
 10 others listening who aren't so familiar with the  
 11 process.  
 12 Just finishing on that point, I make the further  
 13 point that if you are to deal with all of the public  
 14 interest immunity issues, whether or not there is  
 15 an issue of whether Article 2 can be complied with, we  
 16 take the view that in the current circumstances -- maybe  
 17 not always, but in the current circumstances -- it's  
 18 inconceivable that the decisions that you take on public  
 19 interest immunity and any future decision that you are  
 20 to take with respect to Section 19, if there is to be  
 21 a public inquiry, would be different on the current  
 22 circumstances.  
 23 The circumstances might change, in which case they  
 24 would have to be reconsidered, but we take the view that  
 25 the issues on a public inquiry which takes the place of

59

1 an Article 2 inquest, the considerations will be  
 2 similar.  
 3 Can I then move on and deal with the issue about  
 4 whether closed hearings are relevant --  
 5 MR GREANEY: I am sorry to interrupt, Mr Weatherby.  
 6 Before he does, I indicated at the outset that I was  
 7 going to deal with three topics. The second topic is  
 8 the topic of approach, and when I deal with the second  
 9 topic, approach, one of the matters that I will be  
 10 addressing is the extent to which the possibility of  
 11 conversion to an inquiry is a matter which is relevant  
 12 to the Wiley balance.  
 13 I am not trying to shut Mr Weatherby down. If he  
 14 wishes to make his submissions on that topic now, he  
 15 must do so; I simply wanted to alert him to the fact  
 16 that I will be making CTI submissions at the second  
 17 stage of our address today.  
 18 SIR JOHN SAUNDERS: I am afraid this is my fault because  
 19 I invited Sir James to deal with those matters during  
 20 the course of his submissions. Mr Weatherby, I leave it  
 21 up to you: would you like Mr Greaney to go after you or  
 22 before you?  
 23 MR WEATHERBY: I am very concerned for Mr Greaney to make  
 24 that choice. The only reason I was going to address it  
 25 now is because Sir James had moved on and dealt with it.

60

1 SIR JOHN SAUNDERS: You carry on and I will hear from  
2 Mr Greaney at the end, if I may. Thank you.  
3 MR WEATHERBY: I am happy to do that.  
4 With respect to the reference that's been made to  
5 the Litvinenko case at paragraph 65, my reading of the  
6 Litvinenko case is that in fact the issue of public  
7 inquiry wasn't in fact raised in the judgment at that  
8 section at all. In fact, so far as I can see, the only  
9 reference to the public inquiry is the fact that the  
10 coroner -- the reference to the coroner writing to the  
11 Minister in paragraph 25.

12 My understanding of paragraph 65 is the court  
13 criticised the coroner -- although helped (inaudible:  
14 distorted) because it wasn't in fact brought to his  
15 attention -- criticised the coroner for making decisions  
16 on one set of the public interest immunity application,  
17 and then not revisiting that once he had determined, on  
18 a second distinct and separate issue, public interest  
19 immunity applications.

20 Having determined that and not disclosed the  
21 documents relating to the Russian State, he had  
22 determined that, because of that, the inquest process  
23 could not proceed further. It was the fact of the  
24 inquest process not going further which took the legs  
25 away from the public interest in disclosing the first

61

1 tranche of documents. There was no public interest in  
2 open justice if there was going to be no open justice in  
3 that process.

4 So I think it's important that we look at that as  
5 a consequence of that jurisdiction coming to an end,  
6 rather than the influence of another jurisdiction.

7 SIR JOHN SAUNDERS: I agree with that analysis, for what  
8 it's worth.

9 MR WEATHERBY: I'm sorry?

10 SIR JOHN SAUNDERS: Sorry, Mr Weatherby, I was just saying  
11 I agree with that analysis of paragraph 65, for what  
12 that is worth.

13 MR WEATHERBY: Yes, thank you very much. So that is  
14 a convenient way of starting my submissions.

15 The concerns that we have on behalf of the families  
16 in respect of the Secretary of State saying that  
17 a closed hearing should be taken into account in this  
18 jurisdiction is that it is likely or puts pressure on  
19 the court in having a chilling effect in the court  
20 approaching the PII question in the way that CTI has set  
21 out and the authorities set out.

22 What we fear is that the Secretary of State is  
23 saying that the court should in effect take a more  
24 relaxed view to the disclosure of these documents, and  
25 in considering whether public justice, open justice, and

62

1 effective participation -- which we think is something  
2 that must not be forgotten in this process; it's not  
3 just open justice -- must be considered very importantly  
4 in this process, and therefore to make the submission:  
5 well, it may not be possible in this jurisdiction but  
6 somewhere down the line it may be possible to look at  
7 this material judicially in another process; we say it's  
8 not legally permissible and it will have a chilling  
9 effect or may have a chilling effect on the process that  
10 you are conducting today.

11 The principles are, we say, that the legislature  
12 shows not to give the coronial jurisdiction, this  
13 jurisdiction, power to hear evidence in closed hearings,  
14 and that's despite express reference to compliance with  
15 the Convention and the Human Rights Act in Section 5 of  
16 the 2009 Act. So it wasn't as if the legislature wasn't  
17 concerned with such issues. It's despite express  
18 provision of hearings in Rule 11 relating to hearings  
19 from which the public but not interested persons such as  
20 the bereaved or their lawyers can be excluded. It's not  
21 as if the legislature didn't pay attention to this issue  
22 or this problem.

23 It must follow that, in setting the coronial law,  
24 the legislature did not mean for evidence to be heard in  
25 closed hearings.

63

1 So it follows, in our submission, that if the court  
2 considering a PII application within this jurisdiction  
3 considers that the material cannot be disclosed and goes  
4 on to consider that it cannot be disclosed even in  
5 adapted form, by which I mean by way of a summary or  
6 a gist or by suitable redaction, then the application  
7 will be upheld; third question in Mohamed.

8 The next question is whether that so affects the  
9 ability of the process to meet the statutory and  
10 Convention requirements, that the coroner ought to bring  
11 that process to an end. The availability of closed  
12 hearings in another jurisdiction is irrelevant to  
13 whether the public interests in open justice and  
14 effective participation can be sufficiently met within  
15 this process.

16 This is not an academic point, so far as we are  
17 concerned. The imperatives of open justice and  
18 effective participation may be outweighed in some  
19 circumstances, as we all know, by potential damage to  
20 national security, but they are not in any way minimised  
21 by the ability of closed hearings elsewhere. Quite the  
22 opposite.

23 The second point is that the Secretary of State is  
24 asking you to have regard to a jurisdiction that has not  
25 arisen. Therefore, we say it would be wrong in law to

64

1 uphold a PII application within this proceeding, the  
2 coronial proceedings, on the basis of some other method  
3 of dealing with that material which has not arisen.

4 There is no public inquiry, and therefore there is  
5 no power to hear evidence in closed session in any  
6 proceedings extant at the moment, whether under  
7 Section 19 or otherwise.

8 SIR JOHN SAUNDERS: Presumably, Mr Weatherby -- again to  
9 interrupt, I'm sorry -- your argument is somewhat  
10 fortified, being in uncertain times as we are, as to  
11 whether this Home Secretary will be the person who made  
12 that decision.

13 MR WEATHERBY: Well, I'm coming to that, if I may.

14 SIR JOHN SAUNDERS: Oh, sorry. Right.

15 MR WEATHERBY: The third point is that the aspiration or the  
16 view expressed by the Secretary of State does not cure  
17 this legal lacuna. The Secretary of State or her  
18 predecessor could have instituted a public inquiry by  
19 this time. There is of course clear precedent for so  
20 doing where an inquest remains entirely possible, the  
21 Grenfell Inquiry being a good example of that. There is  
22 a precedent for inquiries and inquests taking place  
23 serially, the first round of Hillsborough judicial  
24 inquiry and inquest being an example of that.

25 I am not in any way critical of the

65

1 Secretary of State for not having set up a public  
2 inquiry. It may well be entirely reasonable that she  
3 and her predecessors haven't done so in the current  
4 circumstances, and it may be entirely appropriate not to  
5 do so until or unless this court determines that  
6 an inquest is impossible, but that does not alter the  
7 position that it is a fact that there is no extant power  
8 at the moment.

9 So therefore the fact that the power to institute  
10 a public inquiry has not been exercised means the  
11 consequence of that power is, with respect, irrelevant  
12 to the balance that you have to consider today.

13 The fourth point is the fact that the  
14 Secretary of State has indicated -- and we are grateful  
15 that she has indicated -- that she would be minded to  
16 set up a public inquiry if the inquests do come to  
17 a halt. That's undoubtedly very helpful from a case  
18 management perspective.

19 However, first of all the Secretary of State can  
20 change her mind, and a "minded to" indication does not  
21 create an extant power. There is of course, within the  
22 public inquiry arena, precedent for where ministers have  
23 changed their minds with respect to public inquiries.  
24 A recent example of that is, I think, two ministers  
25 changed their minds over the Leveson 2 inquiry,

66

1 a statutory inquiry which is now not being held.

2 Moreover -- and this is the point that needs  
3 (inaudible: distorted) -- in the current climate, of  
4 course, the Secretary of State may not be  
5 Secretary of State for much longer and the new  
6 incumbent, on entirely normal constitutional principles  
7 which no doubt everyone in court is aware of, would be  
8 entitled to take a wholly different view. Two days ago  
9 this Government tried to dissolve and therefore the  
10 prospect of a new Secretary of State, by the time she or  
11 he might be seized of making this decision, isn't just  
12 a possibility, it's a likelihood; and therefore, in our  
13 submission, it really shouldn't be a matter that should  
14 be taken into account, with respect (inaudible:  
15 distorted).

16 In asserting that what is behind this submission --  
17 and I hope I'm not being rude in saying this -- the  
18 availability of closed hearings is being raised to have  
19 a chilling effect on the relevant test in these  
20 proceedings.

21 I simply repeat -- and then I will finish my  
22 submissions -- that closed hearings may well be a way of  
23 meeting the problems that cannot be met by this  
24 jurisdiction. There have been highly exceptional cases:  
25 the Litvinenko case, as I understand it, the

67

1 Azelle Rodney case and the Anthony Grainger case -- I'm  
2 not aware of a fourth -- but highly exceptional cases  
3 where closed hearings have managed to save some justice  
4 from a position where there could have been no justice.

5 In our submission, in terms of the coronial  
6 jurisdiction where the legislature has set out that  
7 there should be no closed hearings, the imperfect answer  
8 that may have to pertain here down the line should not  
9 be used as a consideration in upholding PII  
10 applications.

11 Those are our submissions.

12 SIR JOHN SAUNDERS: I am grateful, thank you very much,  
13 Mr Weatherby.

14 Can I ask whether other people present have  
15 additional submissions? For those in Manchester?

16 MR GREANEY: I have received a message that there are none.

17 SIR JOHN SAUNDERS: Okay.

18 Mr Greaney, it's my fault that you've not been able  
19 to address me on the other two issues before everybody  
20 else, but you can now have a word in respect of what  
21 they have said.

22 Further submissions by MR GREANEY

23 MR GREANEY: Sir, I will do. Before I turn to what I had  
24 intended should be the second topic, may I just say this  
25 in response to some of the submissions that have been

68

1 made so far.  
 2 Sir, as you know, and as I hope everyone will  
 3 understand, we make submissions to you from  
 4 an independent position and from that position may we  
 5 therefore please give the bereaved families and the  
 6 public more generally an assurance about three  
 7 particular matters.

8 First of all, that when you follow, as we know you  
 9 will, the approach articulated by Lord Justice Thomas in  
 10 Mohamed, the first question that you will ask and answer  
 11 is: is there a public interest in bringing the material  
 12 for which PII has been claimed into the public domain?

13 May I assure everyone that there is an agreed answer  
 14 to that question -- by which I mean agreed by the  
 15 Secretary of State and Greater Manchester Police -- and  
 16 the answer is that it is agreed that there is a strong  
 17 public interest in bringing that material into the  
 18 public domain and we know, sir, that you will approach  
 19 all of the claims on that basis.

20 Secondly, sir, we can assure all that you have had  
 21 and will continue to have well in mind that it is  
 22 important that you should exercise independent judgment  
 23 in relation to these claims and that you should not  
 24 simply, as it was put in Mohamed, salute a ministerial  
 25 flag.

1 Thirdly, all should understand, sir, as you  
 2 indicated earlier, that the process that has been  
 3 under way since 29 July has not simply been a process in  
 4 which we have received submissions and then set out our  
 5 response, but the process has also involved the asking  
 6 of probing questions of both the Secretary of State and  
 7 Greater Manchester Police by your team, requiring  
 8 answers and indeed receiving answers to those questions.  
 9 So already the process has been a rigorous process and  
 10 we know, sir, that that will continue.

11 Sir, turning, therefore, to the second topic, namely  
 12 the approach that we submit you should adopt to this  
 13 hearing. Two particular issues arise. First of all, as  
 14 Mr Weatherby has indicated, the question of whether you  
 15 need to resolve every aspect of the PII claims of the  
 16 Secretary of State and GMP, and secondly the question of  
 17 whether the possibility of conversion to a statutory  
 18 inquiry is relevant to the Wiley balancing exercise, so  
 19 the fourth of the four Lord Justice Thomas questions.

20 As for the first issue, in certain respects we  
 21 submit it would not be sensible for you to resolve the  
 22 PII claims of the Secretary of State and GMP, and that  
 23 is because the trial of Hashem Abedi may have a material  
 24 bearing on the PII claim in those respects, and so it's  
 25 obviously sensible therefore to defer your decision in

1 relation to those particular matters.

2 So far as the balance is concerned -- and  
 3 undoubtedly there is a balance -- it may not be strictly  
 4 necessary for you to resolve it in its entirety, and  
 5 that is because, sir, you may reach a point before the  
 6 end at which it becomes clear to you that you have  
 7 upheld sufficient to make an Article 2 compliant inquest  
 8 process impossible. So strictly you do not or may not  
 9 need to resolve everything.

10 Nonetheless on reflection we are persuaded that  
 11 there is sense in the Secretary of State's most recent  
 12 submission that you should resolve as much as possible  
 13 today, but ultimately, as Mr Weatherby has submitted,  
 14 that is a case management decision for you.

15 The second issue under this second heading of  
 16 approach is whether, in carrying out the Wiley balancing  
 17 exercise of weighing the public interest in disclosure  
 18 against the real risk of serious harm to national  
 19 security if such disclosure is made, weight should be  
 20 attached to the alternative mechanism afforded by the  
 21 Inquiries Act to convert your investigation into  
 22 a statutory inquiry. Sir, as has been obvious from the  
 23 submissions you have heard already today, there is  
 24 a dispute as to whether that is or is not a relevant  
 25 factor.

1 The Secretary of State, and indeed GMP in writing,  
 2 have argued that it is; we have argued that it is not,  
 3 as of course as Mr Weatherby on behalf of the family  
 4 that he represents as well.

5 Since then the Secretary of State has made further  
 6 detailed submissions, those being the submissions of  
 7 4 September. We remain unpersuaded by those further  
 8 submissions. That is to say, we are unconvinced that  
 9 the possibility of conversion to a statutory inquiry is  
 10 a relevant consideration at this stage. Albeit we can  
 11 see how, in accordance with paragraph 65 of the judgment  
 12 of Lord Justice Goldring in his Litvinenko judgment, it  
 13 may be a relevant factor down the line. In very simple  
 14 terms the principal reason why we submit it is not a  
 15 factor at this stage is because it is to put the cart  
 16 before the horse. Nonetheless, it may be unnecessary  
 17 for you to resolve the issue, although whether you do  
 18 so, sir, is of course entirely a matter for you.

19 It would be possible for you to approach matters in  
 20 the following way: to carry out the Wiley balancing  
 21 exercise in relation to the claims, ignoring the  
 22 possibility of conversion in the first instance. If, on  
 23 adopting that approach, you came to the clear view that  
 24 the PII claim should be upheld, then it would be  
 25 strictly unnecessary for you to consider whether the

1 possibility of conversion was a relevant factor. But  
2 if, however, you were to conclude on that approach that  
3 matters were more finely balanced, at that stage you  
4 would need to determine the issue. So, sir, that is  
5 an approach that is available to you.

6 Finally, on this second issue, as Mr Weatherby has  
7 done, we should publicly acknowledge that the  
8 Secretary of State has made plain in the clearest terms  
9 that if you recommend that there should be a conversion  
10 to a statutory inquiry, she would be minded to follow  
11 that recommendation. For our part, we are grateful that  
12 she has felt able to be as clear as that.

13 So, sir, those are our submissions on the second  
14 topic. It may be that those who wish to make  
15 submissions on them feel they have already done so, but  
16 otherwise we invite submissions in the order that we  
17 suggested earlier.

18 SIR JOHN SAUNDERS: I think everyone probably has addressed  
19 that particular matter and it may be that if you go on  
20 to matter 3, I will then invite people if they want to  
21 come back on things at that stage. I am sorry for  
22 altering the timetable.

23 MR GREANEY: No, you mustn't apologise, sir, it is no one's  
24 fault and in fact all concerned may feel that the  
25 argument and issues have developed in a structured and

73

1 helpful way as a result.

2 Sir, the third issue is one on which we can make our  
3 submissions very shortly, and that issue is the  
4 categories of PII.

5 Understandably, the interested persons want as much  
6 information as possible about the subject matter of the  
7 PII claims. Against that background, the  
8 Secretary of State has been asked whether there is any  
9 further information that can be provided in addition to  
10 that provided in the initial open submissions.

11 In her submissions of 4 September, she has confirmed  
12 that the formulation in the GMP open certificate stands  
13 as an accurate description of the broad categories of  
14 national security harm that would be caused by the  
15 disclosure of PII material. For our part, sir, we  
16 accept that that is as far as she can properly go.

17 Those are our submissions.

18 SIR JOHN SAUNDERS: Sir James, do you want to say anything  
19 else or make any comeback to things that have been said  
20 about the Secretary of State's position?

21 Further submissions by SIR JAMES EADIE

22 SIR JAMES EADIE: Sir, very, very briefly, if I may, on the  
23 submissions that were made by counsel for the families,  
24 I wanted to make three very short points, if I may.

25 Firstly, lest I be misunderstood, it is entirely

74

1 clear and was accepted by me in terms, and I reiterate,  
2 that the open justice principle is a thoroughly  
3 important matter. It is a relevant feature, whether you  
4 are considering PII without a public inquiry. It would  
5 be a relevant feature and an important feature if you  
6 were considering it under Section 19 and this had been  
7 reconstituted as a public inquiry. Let there be no  
8 doubt about my acceptance of that.

9 The point that I was making -- and this is the  
10 second point I wish to make -- is that despite the  
11 importance of that principle, the balancing tests that  
12 are set out in the case law indicate quite plainly that  
13 despite the importance of that principle it does not  
14 require as the price to be paid to protect it the  
15 creation of the very damage which PII seeks to protect.  
16 In other words, putting the public at risk by the  
17 disclosure and revelation of information which might be  
18 of value to terrorists.

19 Thirdly, I wish to emphasise -- and again I made  
20 this point in opening so I can do it very shortly -- the  
21 public interest and the value in the inquirer or the  
22 coroner having access to all of the material. Let that  
23 not be diminished in terms of its importance. It cannot  
24 be in anyone's interests for the functions which you  
25 would have to perform, whether under Article 2 of the

75

1 ECHR or otherwise, particularly perhaps when reviewing  
2 whether organs of the State could have done more, should  
3 have done more, whether there are lessons that can be  
4 learned and should be learned in order to enable them to  
5 seek better to protect the public. It cannot be in  
6 anyone's interest for you, in the performance of your  
7 function as an inquirer or a coroner to have anything  
8 less than the full material.

9 That is the significance of the public inquiry,  
10 because it is only by that route, if we are right about  
11 the damage that might be caused to national security,  
12 that you will be able to perform that function properly  
13 and fully.

14 That's all I wish to say by way of response to that  
15 part of the submissions.

16 You raise, when considering the question whether  
17 there should be some attention paid to the possibility  
18 of a public inquiry, the possibility that this might not  
19 be the same Secretary of State in a few days' time, and  
20 having come from the argument I had in court  
21 yesterday --

22 SIR JOHN SAUNDERS: You know more about it than I do!

23 SIR JAMES EADIE: -- there was the possibility that almost  
24 anything might happen in any period of 24 hours from  
25 here going forward.

76

1 SIR JOHN SAUNDERS: Presumably you wouldn't like that  
2 quoted!  
3 SIR JAMES EADIE: As it stands as present, however, the  
4 position is that you have a statement from the  
5 Home Office, from the Home Secretary, giving  
6 an indication from that, and of course it is right that  
7 in performance of constitutional functions politicians  
8 can change their mind, can review and reach a different  
9 outcome.

10 My only riposte to that is that so can you. It is  
11 positively required of coroners to keep public interest  
12 immunity, and no doubt of inquirers under Section 19, to  
13 keep the decisions they make there under review.

14 That is one of the things that's demonstrated by  
15 paragraph 65 of the Litvinenko judgment and it is trite .  
16 What that means is that if the Secretary of State were  
17 to change the view, and if you were to have taken into  
18 account the possibility of a public inquiry as part of  
19 the PII analysis, you could and no doubt would review  
20 that decision in the light of the fact that that had  
21 been changed and that there would be no longer be  
22 a public inquiry because the Secretary of State had  
23 changed his or her mind. So we respectfully remind you  
24 of that.

25 Mr Weatherby said he was aware of some wholly

77

1 exceptional circumstances in which some form of closed  
2 process had given justice to the families and was only  
3 aware of three of them. I think he is probably right  
4 that in relation to the three he mentioned, those were  
5 the three that went from inquest to public inquiry  
6 directly, as it were, but you will also bear in mind  
7 that there were a series of public inquiries in  
8 Northern Ireland, the Rosemary Nelson one being the  
9 classic example, but there were three or four -- the  
10 Hammond inquiry -- that occurred at the same time. In  
11 relation to all of those, there was a public inquiry,  
12 and in relation to all of those there was secret  
13 material that could only be considered in closed. It  
14 was considered in closed. All of those inquiries were  
15 able to report, they were all able to report on the  
16 basis of a full consideration of all of the evidence,  
17 including the closed material, and it might be thought,  
18 consistently with the third of my points earlier on, it  
19 might be thought that that enabled better justice to be  
20 secured to the loved ones of those who had been killed  
21 because and precisely because the inquiry was able to  
22 look at all of that material, albeit that some of it  
23 could not be made available. It was probed, it was  
24 tested by counsel to the inquiry in those cases, and the  
25 result was a fuller justice, it might be thought, than

78

1 would otherwise have been obtainable.

2 That was precisely why the Inquiries Act 2005 was  
3 brought in, in relevant part, to enable that possibility  
4 to occur in that context.

5 SIR JOHN SAUNDERS: Sir James, just before you sit down, as  
6 part of the preparation for this, I have read your  
7 submissions in relation to the London Bridge inquiry  
8 where PII was upheld but nevertheless the coroner  
9 decided that he had enough information to carry out  
10 an Article 2 inquiry.

11 SIR JAMES EADIE: Yes.

12 SIR JOHN SAUNDERS: Obviously there is a significant balance  
13 which has to be done there. On the one hand, as I think  
14 you cogently put it to the coroner in that case, if you  
15 have PII but still allow the inquest to go on, it means  
16 the families can participate, they can hear everything  
17 which is said, but equally the PII material can't be  
18 taken into account. So there has to be this balance  
19 between what the PII material is, the desirability of  
20 the families hearing absolutely everything, but equally  
21 the overwhelming desirability of me being able to carry  
22 out a proper inquiry.

23 I am afraid this is very fact specific. All I can  
24 do is assure anyone that as far as I am concerned this  
25 will be a rigorous process. PII will not be used, if

79

1 anyone suspects it might, as a device for covering  
2 responsibility and I will do my very best to ensure that  
3 that doesn't happen. If it means that I am carrying out  
4 an investigation on the families' behalf, I am afraid  
5 they will just have to take it from me that I am doing  
6 that properly. If it turns out that they can take part  
7 in it because of the decisions I make, no doubt all the  
8 better. But a rigorous investigation will take place of  
9 whatever nature I decide in the end.

10 SIR JAMES EADIE: And I will not be dissuading you from that  
11 course.

12 SIR JOHN SAUNDERS: I am sure you won't. Right.

13 I think I have probably heard as much as I need to  
14 hear, unless anybody wants to come back specifically on  
15 any particular point, but obviously I don't want to cut  
16 anyone out from anything they do wish to say.

(Pause)

17 Either someone has muted Manchester or no one wants  
18 to say anything ...

19 MS CARTWRIGHT: No, nobody wants to say anything, thank you.

20 MR COOPER: No, thank you, sir.

21 MR WEATHERBY: Thank you.

22 SIR JOHN SAUNDERS: We will now adjourn for a short time in  
23 order to decide whether anything was said which  
24 shouldn't be reported.  
25

80

1 The only thing that I noted as we went past -- and  
 2 maybe it can be reported -- was Mr Weatherby's questions  
 3 about what was known about members of the Abedi family  
 4 prior to the bombing taking place and whether they had  
 5 had any contact. Perhaps people would like to consider  
 6 specifically in relation to that whether it would be  
 7 better if that was not reported.  
 8 MR GREANEY: Sir, what we would invite is if Ms Cartwright  
 9 could consult with Catherine Selby of the Crown  
 10 Prosecution Service and we will consult here with  
 11 Greater Manchester Police.  
 12 SIR JOHN SAUNDERS: Shall I come back in 10 minutes?  
 13 MR GREANEY: Ten minutes will be sufficient.  
 14 SIR JOHN SAUNDERS: Very well. I am grateful for the  
 15 submissions.  
 16 (12.00 pm)  
 17 (A short break)  
 18 (12.10 pm)  
 19 MR GREANEY: Sir, I've spoken to the representative of the  
 20 Crown Prosecution Service myself, and I have also spoken  
 21 to the representatives of Greater Manchester Police.  
 22 There is no application for any reporting restriction,  
 23 but the Crown Prosecution Service are understandably  
 24 keen that I should emphasise that there should be no  
 25 reference to any contact between the security services

81

1 and any particular individual. As long as it's kept  
 2 general, the Abedi family, that is fine, which is  
 3 of course the way in which Mr Weatherby put it, but no  
 4 more than that.  
 5 SIR JOHN SAUNDERS: Right, thank you very much. We will go  
 6 into closed session as soon as we can --  
 7 MR COOPER: May I raise two matters before the court rises.  
 8 One is to say the only other report we have alighted  
 9 upon is Max Hill's report. You asked us for that.  
 10 Simply this: can we take the opportunity, as far as  
 11 we can, to have an enquiry as to whether the trial of  
 12 Abedi is still proceeding efficiently towards the  
 13 proposed date.  
 14 SIR JOHN SAUNDERS: I wouldn't have up to date information  
 15 on that, but you do have a representative from the Crown  
 16 Prosecution Service there. Would it be possible for you  
 17 to try and check that with her there rather than me  
 18 trying to do it now?  
 19 MR COOPER: I won't detain you any longer, sir. Thank you.  
 20 SIR JOHN SAUNDERS: No, thank you, Mr Cooper.  
 21 (12.15 pm)  
 22 (The open hearing adjourned)  
 23  
 24  
 25

82

	INDEX	PAGE
3	Housekeeping .....	1
5	Submissions by MR GREANEY .....	10
7	Submissions by SIR JAMES EADIE .....	12
9	Submissions by MR PAYNE .....	35
11	Submissions by MR COOPER .....	36
13	Submissions by MR WEATHERBY .....	50
15	Further submissions by MR GREANEY .....	68
17	Further submissions by SIR JAMES EADIE .....	74
19		84

83

84

<p><b>A</b></p> <p><b>abedi (20)</b> 1:9,10,20,23 2:6,9,13,25 3:2,5,16 4:6,22 55:11 56:3,13 70:23 81:3 82:2,12</p> <p><b>abedis (2)</b> 1:17 3:24</p> <p><b>ability (4)</b> 15:23 25:18 64:9,21</p> <p><b>able (13)</b> 10:9 11:17 13:2 17:17 24:3 33:18 68:18 73:12 76:12 78:15,15,21 79:21</p> <p><b>absolute (1)</b> 47:13</p> <p><b>absolutely (3)</b> 28:1,12 79:20</p> <p><b>academic (1)</b> 64:16</p> <p><b>accept (5)</b> 12:25 19:5 21:2 30:23 74:16</p> <p><b>acceptance (1)</b> 75:8</p> <p><b>accepted (3)</b> 17:8 19:2 75:1</p> <p><b>accepting (1)</b> 44:16</p> <p><b>accepts (1)</b> 24:18</p> <p><b>access (7)</b> 15:20 24:4 26:23 52:14 53:11 58:16 75:22</p> <p><b>accord (1)</b> 27:19</p> <p><b>accordance (2)</b> 11:8 72:11</p> <p><b>accorded (2)</b> 28:20 29:23</p> <p><b>according (1)</b> 17:12</p> <p><b>account (12)</b> 21:15 22:6 23:6,16 24:10 25:11 38:3 48:19 62:17 67:14 77:18 79:18</p> <p><b>accountability (2)</b> 16:4 48:16</p> <p><b>accountable (1)</b> 51:1</p> <p><b>accurate (1)</b> 74:13</p> <p><b>accused (2)</b> 2:19,20</p> <p><b>achieve (1)</b> 50:22</p> <p><b>acknowledge (1)</b> 73:7</p> <p><b>acknowledged (3)</b> 13:23 34:21 39:12</p> <p><b>acquiescence (1)</b> 46:3</p> <p><b>acquire (1)</b> 24:1</p> <p><b>acting (1)</b> 45:16</p> <p><b>action (1)</b> 46:19</p> <p><b>actions (2)</b> 14:5 19:3</p> <p><b>activity (1)</b> 45:15</p> <p><b>actual (4)</b> 24:18 25:13 32:17 33:6</p> <p><b>actually (16)</b> 5:24 6:7 20:20 23:12,15,21 27:3,10 30:13 31:21 32:10 34:7,18 54:7 58:6,10</p> <p><b>acutely (1)</b> 44:10</p> <p><b>adapted (1)</b> 64:5</p> <p><b>add (6)</b> 9:14 16:22 38:2 41:8,25 57:3</p> <p><b>addition (2)</b> 8:7 74:9</p> <p><b>additional (1)</b> 68:15</p> <p><b>address (10)</b> 2:18 5:8 10:9 12:8 21:11 44:1 46:10 60:17,24 68:19</p> <p><b>addressed (5)</b> 33:2 44:21 53:21 57:15 73:18</p> <p><b>addressing (1)</b> 60:10</p> <p><b>adjoining (1)</b> 80:23</p>	<p><b>adjourned (3)</b> 2:23,24 82:22</p> <p><b>administration (1)</b> 4:21</p> <p><b>adopting (1)</b> 72:23</p> <p><b>adopt (2)</b> 10:14 70:12</p> <p><b>advance (1)</b> 36:11</p> <p><b>advantage (1)</b> 22:21</p> <p><b>advice (5)</b> 18:9 26:23,24 48:3 52:15</p> <p><b>advisers (1)</b> 48:3</p> <p><b>advocates (2)</b> 1:5 3:20</p> <p><b>affect (1)</b> 30:11</p> <p><b>affected (3)</b> 16:9 24:10 47:17</p> <p><b>affects (5)</b> 30:12,14 31:14 32:13 64:8</p> <p><b>afforded (1)</b> 71:20</p> <p><b>afraid (4)</b> 58:17 60:18 79:23 80:4</p> <p><b>after (3)</b> 7:23 58:11 60:21</p> <p><b>again (12)</b> 8:23 15:4 16:10 29:4 36:25 44:20,23 45:2 55:15 56:7 65:8 75:19</p> <p><b>against (12)</b> 1:23 2:5,9,13 3:16 4:6,21 13:21 29:13 32:11 71:18 74:7</p> <p><b>age (1)</b> 2:18</p> <p><b>agencies (3)</b> 14:6 22:15,24</p> <p><b>ages (1)</b> 50:22</p> <p><b>ago (1)</b> 67:8</p> <p><b>agree (6)</b> 20:23 21:2 30:14 32:7 62:7,11</p> <p><b>agreed (4)</b> 36:1 69:13,14,16</p> <p><b>agreeing (1)</b> 57:24</p> <p><b>alan (1)</b> 7:3</p> <p><b>alasdair (1)</b> 6:22</p> <p><b>albeit (2)</b> 72:10 78:22</p> <p><b>alert (1)</b> 60:15</p> <p><b>alex (3)</b> 7:14,15 8:3</p> <p><b>alighted (1)</b> 82:8</p> <p><b>alison (1)</b> 7:16</p> <p><b>alive (1)</b> 29:21</p> <p><b>allayed (1)</b> 41:17</p> <p><b>allow (3)</b> 27:6 55:9 79:15</p> <p><b>almost (2)</b> 22:13 76:23</p> <p><b>already (20)</b> 8:11 17:12 21:3 32:12 36:13 37:21 42:1,3 44:6 45:23 46:20 48:20,21 49:5,6,10 56:5 70:9 71:23 73:15</p> <p><b>also (21)</b> 1:24 7:19,19,20,22 8:4,15,23 15:2 26:13 28:24 37:20 49:19 52:18 53:8 54:4 55:8 58:14 70:5 78:6 81:20</p> <p><b>alter (1)</b> 66:6</p> <p><b>altering (1)</b> 73:22</p> <p><b>alternative (1)</b> 71:20</p> <p><b>alternatives (1)</b> 25:17</p> <p><b>although (7)</b> 40:17 43:9 45:25 52:19 56:22 61:13 72:17</p> <p><b>always (6)</b> 20:18 26:5 27:7,11,24 59:17</p> <p><b>amanda (1)</b> 8:5</p>	<p><b>ambulance (1)</b> 8:6</p> <p><b>amin (1)</b> 40:23</p> <p><b>amount (5)</b> 48:21 54:6,8 58:14,16</p> <p><b>amounts (1)</b> 27:9</p> <p><b>analysis (12)</b> 13:7 20:10,16 27:2 29:6 33:22 42:17 47:22 48:4 62:7,11 77:19</p> <p><b>analytical (3)</b> 20:13 25:4,10</p> <p><b>analytically (1)</b> 34:23</p> <p><b>andersons (1)</b> 49:22</p> <p><b>andor (1)</b> 16:6</p> <p><b>angelika (1)</b> 7:11</p> <p><b>another (5)</b> 26:6 54:24 62:6 63:7 64:12</p> <p><b>answer (10)</b> 15:17 20:2,14 26:21 34:12 39:4 68:7 69:10,13,16</p> <p><b>answers (3)</b> 30:7 70:8,8</p> <p><b>anthony (1)</b> 68:1</p> <p><b>anticipate (4)</b> 4:14 41:19 49:14 53:23</p> <p><b>anxious (2)</b> 51:19 56:23</p> <p><b>anybody (2)</b> 8:17 80:14</p> <p><b>anyone (8)</b> 3:7 5:22 6:7 11:24 27:8 79:24 80:1,16</p> <p><b>anyones (2)</b> 75:24 76:6</p> <p><b>anything (15)</b> 2:4 3:8,12,15 4:19 5:22 6:5,15 74:18 76:7,24 80:16,19,20,24</p> <p><b>anyway (1)</b> 24:8</p> <p><b>anywhere (1)</b> 30:19</p> <p><b>apart (1)</b> 46:7</p> <p><b>apologise (1)</b> 73:23</p> <p><b>apparent (1)</b> 27:11</p> <p><b>appear (4)</b> 26:9 53:18,21 57:11</p> <p><b>appears (1)</b> 56:24</p> <p><b>applicable (3)</b> 3:3 11:2 13:11</p> <p><b>application (23)</b> 3:4,6 12:18,20 17:3 18:6 20:1,2 24:24 33:15 43:7 48:19 49:3,11 51:12 53:5 54:24 57:4 61:16 64:2,6 65:1 81:22</p> <p><b>applications (15)</b> 42:10 43:1 51:17 53:25 54:4,5,20 55:4,9,25 57:5,14,19 61:19 68:10</p> <p><b>applied (1)</b> 8:25</p> <p><b>applies (1)</b> 3:12</p> <p><b>apply (1)</b> 53:1</p> <p><b>appreciate (1)</b> 10:8</p> <p><b>appreciation (1)</b> 31:2</p> <p><b>approach (30)</b> 10:13 14:9 15:11,15 16:14,14 23:12 25:10 31:7,12 35:6 38:17 39:17 41:20 44:18 51:19 52:4 53:1 56:24 57:20 60:8,9 69:9,18 70:12 71:16 72:19,23 73:2,5</p> <p><b>approaches (1)</b> 48:23</p> <p><b>approaching (1)</b> 62:20</p> <p><b>appropriate (5)</b> 3:25 11:22 12:4 57:21 66:4</p>	<p>11:22 12:4 57:21 66:4</p> <p><b>appropriately (1)</b> 17:4</p> <p><b>area (3)</b> 20:6,7,13</p> <p><b>arena (2)</b> 41:23 66:22</p> <p><b>arent (1)</b> 59:10</p> <p><b>argue (1)</b> 38:23</p> <p><b>argued (2)</b> 72:2,2</p> <p><b>argument (6)</b> 34:5,15 40:25 65:9 73:25 76:20</p> <p><b>arguments (3)</b> 14:12 32:6 42:21</p> <p><b>arise (3)</b> 13:6 30:3 70:13</p> <p><b>arisen (3)</b> 32:19 64:25 65:3</p> <p><b>arises (2)</b> 5:6 21:13</p> <p><b>arm (2)</b> 16:6,6</p> <p><b>article (5)</b> 59:15 60:1 71:7 75:25 79:10</p> <p><b>articulated (3)</b> 45:11 47:16 69:9</p> <p><b>artificial (5)</b> 23:6 24:11,22 38:21,23</p> <p><b>ask (10)</b> 34:4 36:12,22 37:20 38:2 48:18 49:2,21 68:14 69:10</p> <p><b>asked (3)</b> 51:25 74:8 82:9</p> <p><b>asking (3)</b> 30:20 64:24 70:5</p> <p><b>aspect (10)</b> 2:13 17:15 23:13 31:21,22 32:23,24 47:3 58:7 70:15</p> <p><b>aspects (1)</b> 31:15</p> <p><b>aspiration (1)</b> 65:15</p> <p><b>asserting (1)</b> 67:16</p> <p><b>assertion (1)</b> 47:22</p> <p><b>assessing (1)</b> 27:20</p> <p><b>assessment (6)</b> 17:4,22 18:8 28:3,8,23</p> <p><b>assessments (1)</b> 28:21</p> <p><b>assist (2)</b> 40:4 53:17</p> <p><b>assistance (1)</b> 27:4</p> <p><b>assistant (1)</b> 7:2</p> <p><b>associated (1)</b> 25:15</p> <p><b>assuming (2)</b> 8:17 12:16</p> <p><b>assurance (2)</b> 43:12 69:6</p> <p><b>assure (4)</b> 52:2 69:13,20 79:24</p> <p><b>assured (2)</b> 11:19 43:11</p> <p><b>atkinson (1)</b> 7:10</p> <p><b>attached (2)</b> 35:19 71:20</p> <p><b>attaches (1)</b> 56:18</p> <p><b>attacks (1)</b> 13:21</p> <p><b>attempted (1)</b> 1:12</p> <p><b>attention (3)</b> 61:15 63:21 76:17</p> <p><b>attracts (1)</b> 29:14</p> <p><b>august (6)</b> 9:12,19,20,22 37:22 53:7</p> <p><b>authored (1)</b> 50:8</p> <p><b>authorities (3)</b> 46:8 50:25 62:21</p> <p><b>availability (3)</b> 47:2 64:11 67:18</p> <p><b>available (6)</b> 20:18 24:16 28:23 49:7 73:5 78:23</p>	<p><b>avoid (2)</b> 18:2 19:15</p> <p><b>avoidance (1)</b> 5:4</p> <p><b>avoiding (1)</b> 22:18</p> <p><b>aware (10)</b> 2:3 44:10 45:5 49:22,23 50:1 67:7 68:2 77:25 78:3</p> <p><b>away (3)</b> 55:16,19 61:25</p> <p><b>axiomatic (1)</b> 46:1</p> <p><b>azelle (1)</b> 68:1</p>	<p>54:17 56:12 79:19 81:25</p> <p><b>beyond (2)</b> 3:16 11:16</p> <p><b>bingham (1)</b> 41:2</p> <p><b>binyam (1)</b> 45:9</p> <p><b>bit (1)</b> 55:17</p> <p><b>bite (1)</b> 3:18</p> <p><b>blunt (1)</b> 5:12</p> <p><b>bolted (2)</b> 49:10,12</p> <p><b>bomber (1)</b> 1:10</p> <p><b>bombing (5)</b> 1:12 41:22 56:5,14 81:4</p> <p><b>both (14)</b> 3:21 14:9 16:13 25:17 28:21 32:24 33:19,21 42:6,15 49:17 53:6 58:12 70:6</p> <p><b>boyle (1)</b> 8:2</p> <p><b>breadth (1)</b> 30:24</p> <p><b>break (3)</b> 4:15 34:23 81:17</p> <p><b>brewster (1)</b> 7:10</p> <p><b>bridge (2)</b> 58:9 79:7</p> <p><b>brief (3)</b> 21:1 40:18 50:18</p> <p><b>briefly (5)</b> 13:12 21:12 36:13 40:15 74:22</p> <p><b>bring (1)</b> 64:10</p> <p><b>bringing (3)</b> 11:12 69:11,17</p> <p><b>british (1)</b> 31:19</p> <p><b>broad (4)</b> 29:1,7 52:4 74:13</p> <p><b>brother (1)</b> 1:9</p> <p><b>broudie (2)</b> 7:18 9:13</p> <p><b>brought (5)</b> 28:22 41:14,15 61:14 79:3</p> <p><b>brush (1)</b> 52:4</p> <p><b>bundle (3)</b> 14:15 36:20 37:5</p>	<p><b>cast (2)</b> 51:18 54:4</p> <p><b>categories (4)</b> 10:14 18:12 74:4,13</p> <p><b>category (1)</b> 53:14</p> <p><b>catherine (3)</b> 6:11 8:12 81:9</p> <p><b>cause (2)</b> 1:13 46:20</p> <p><b>caused (3)</b> 51:2 74:14 76:11</p> <p><b>caution (1)</b> 4:1</p> <p><b>central (3)</b> 51:5 54:8 57:17</p> <p><b>centuries (1)</b> 41:4</p> <p><b>certain (6)</b> 1:17 2:14 16:5 46:17,17 70:20</p> <p><b>certificate (4)</b> 18:11 39:9 45:5 74:12</p> <p><b>certificates (3)</b> 9:12,18 11:20</p> <p><b>challenge (1)</b> 5:7</p> <p><b>challenged (1)</b> 11:22</p> <p><b>challenging (1)</b> 10:6</p> <p><b>change (4)</b> 59:23 66:20 77:8,17</p> <p><b>changed (4)</b> 66:23,25 77:21,23</p> <p><b>charged (1)</b> 2:21</p> <p><b>check (2)</b> 50:12 82:17</p> <p><b>chief (3)</b> 7:2 13:9 58:9</p> <p><b>chilling (4)</b> 62:19 63:8,9 67:19</p> <p><b>chloe (1)</b> 8:1</p> <p><b>choice (1)</b> 60:24</p> <p><b>circulated (1)</b> 3:7</p> <p><b>circumstance (1)</b> 47:9</p> <p><b>circumstances (10)</b> 4:1 21:20 38:25 59:16,17,22,23 64:19 66:4 78:1</p> <p><b>cite (2)</b> 40:22 45:9</p> <p><b>cited (2)</b> 45:23 47:20</p> <p><b>claimed (4)</b> 11:13 50:3 52:2 69:12</p> <p><b>claims (14)</b> 9:6 11:8,15,18 35:12,18,23 52:3 69:19,23 70:15,22 72:21 74:7</p> <p><b>classic (1)</b> 78:9</p> <p><b>clear (19)</b> 11:14 14:9 15:14 16:11 19:6 20:2,14 21:21 23:23 29:16 35:22 39:10,21 41:12 65:19 71:6 72:23 73:12 75:1</p> <p><b>clearest (1)</b> 73:8</p> <p><b>clearly (2)</b> 30:2 58:13</p> <p><b>client (2)</b> 36:6 39:20</p> <p><b>clients (1)</b> 49:15</p> <p><b>climate (1)</b> 67:3</p> <p><b>closed (43)</b> 9:17,18,20,21,24 11:5,20,20 17:1,2 18:10 22:1,1,19,22 30:2,18 40:11 42:21 51:22 53:11 54:14 58:6,10,14,15 59:5 60:4 62:17 63:13,25 64:11,21 65:5 67:18,22 68:3,7 78:1,13,14,17 82:6</p> <p><b>closer (2)</b> 30:23 55:19</p> <p><b>cogent (2)</b> 17:3 18:13</p>
<b>B</b>						

**cogently (1)** 79:14  
**coherence (1)** 34:16  
**cold (1)** 55:22  
**come (6)** 26:7 66:16  
 73:21 76:20 80:14  
 81:12  
**comeback (1)** 74:19  
**comes (2)** 17:19,23  
**coming (3)** 32:11 62:5  
 65:13  
**command (1)** 46:3  
**commensurately (1)**  
 29:25  
**comments (1)** 26:22  
**commitment (1)** 1:19  
**committed (1)** 1:14  
**committee (2)** 49:24  
 50:10  
**common (1)** 33:3  
**commons (1)** 49:25  
**compared (1)** 47:6  
**competence (1)** 28:22  
**complete (1)** 10:4  
**completed (1)** 1:10  
**compliance (2)** 10:4  
 63:14  
**compliant (1)** 71:7  
**complied (2)** 10:6 59:15  
**comply (1)** 3:10  
**comprehensively (1)**  
 51:8  
**concern (3)** 21:11,13  
 47:23  
**concerned (16)** 13:8  
 18:24 38:2,22 43:23  
 44:9 45:1,9 48:15  
 49:16 60:23 63:17  
 64:17 71:2 73:24  
 79:24  
**concerning (1)** 48:22  
**concerns (2)** 44:4 62:15  
**conclude (2)** 30:21 73:2  
**concludes (1)** 45:17  
**conclusion (7)** 4:12  
 16:13 18:23 30:17  
 32:5 33:7 34:4  
**conclusions (1)** 35:13  
**condition (1)** 12:18  
**conducive (1)** 24:2  
**conduct (2)** 22:24 41:15  
**conducting (1)** 63:10  
**confirm (1)** 9:8  
**confirmed (1)** 74:11  
**connected (1)** 2:1  
**consequence (3)** 19:18  
 62:5 66:11  
**consequences (1)** 42:18  
**consider (16)** 19:5  
 22:19,23 31:21 33:15  
 42:19 57:9,13,16,19  
 58:24 59:3 64:4 66:12  
 72:25 81:5  
**considerable (4)** 9:15  
 48:9,12,21  
**consideration (20)** 4:16  
 13:22 16:25 17:25  
 18:20 19:7,21 21:5  
 22:15,16 35:11 38:19  
 40:2,21 41:23 52:13  
 54:21 68:9 72:10  
 78:16  
**considerations (3)**  
 16:23 54:22 60:1

**considered (10)** 8:23  
 18:8 25:16 29:19  
 30:19 34:11 54:7 63:3  
 78:13,14  
**considering (16)** 3:8  
 12:15 13:5 17:19 25:2  
 35:18 38:4,11 48:19  
 51:11 54:25 62:25  
 64:2 75:4,6 76:16  
**considers (3)** 31:20  
 42:10 64:3  
**consistent (2)** 26:6 28:1  
**consistently (2)** 13:23  
 78:18  
**conspiracy (1)** 1:13  
**constable (1)** 7:2  
**constitutional (6)** 16:1  
 52:17,20,24 67:6 77:7  
**consult (2)** 81:9,10  
**consultation (3)** 4:16,18  
 6:17  
**contact (4)** 56:10,12  
 81:5,25  
**contain (1)** 50:1  
**contempt (4)** 1:24  
 2:7,15 5:6  
**context (7)** 14:4 16:4  
 42:15 45:17,25 46:19  
 79:4  
**continue (2)** 69:21  
 70:10  
**contributed (1)** 51:1  
**contributing (1)** 49:17  
**controversy (2)** 20:6,8  
**convenient (1)** 62:14  
**convention (2)** 63:15  
 64:10  
**conversion (6)** 60:11  
 70:17 72:9,22 73:1,9  
**convert (2)** 23:8 71:21  
**conway (2)** 14:14,20  
**cooper (30)** 7:14 8:9  
 36:3,4,7,9,19,21  
 37:2,8,14,18,25  
 39:7,14,20 43:6,13  
 46:5,9 49:21  
 50:7,11,15 55:15  
 80:21 82:7,19,20  
 83:11  
**corollary (2)** 52:17,20  
**coroner (23)** 15:15  
 16:14 21:6 22:23 23:4  
 24:3,23 25:12 28:7  
 29:11 30:24 31:19,24  
 58:9 61:10,10,13,15  
 64:10 75:22 76:7  
 79:8,14  
**coroners (1)** 77:11  
**coronial (5)** 17:17  
 63:12,23 65:2 68:5  
**correct (1)** 52:11  
**correction (1)** 43:15  
**counsel (24)** 2:21  
 4:16,18 6:4,17,20  
 7:1,1,3,14,18 9:21,24  
 13:1 34:14 38:17  
 39:24 40:17 43:17  
 50:4 51:8,23 74:23  
 78:24  
**counterterrorism (5)**  
 35:10 54:10,17  
 56:2,13  
**countervailing (1)** 12:25

**country (1)** 41:2  
**couple (2)** 54:12 55:8  
**course (41)** 2:5,7 3:13  
 4:10 8:19 12:16  
 16:22,25 21:11,21  
 22:2 24:25 29:4,14  
 33:8,20 34:12 38:6  
 41:8 42:6 43:9,13,14  
 44:4 49:22,23 52:14  
 53:9,11 54:13,20  
 58:20 60:20 65:19  
 66:21 67:4 72:3,18  
 77:6 80:11 82:3  
**courtney (1)** 8:2  
**courtroom (1)** 6:23  
**courts (8)** 13:23 14:8  
 15:11,14,20 16:14  
 26:16 27:17  
**covered (3)** 19:25 21:15  
 22:16  
**covering (3)** 49:4,4 80:1  
**covert (1)** 56:8  
**create (3)** 2:4 4:20  
 66:21  
**creates (1)** 4:5  
**creating (2)** 18:25 22:7  
**creation (1)** 75:15  
**critical (3)** 2:3 42:18  
 65:25  
**criticised (3)** 43:3  
 61:13,15  
**criticism (2)** 42:5 51:1  
**crown (9)** 3:4 4:16  
 6:8,12 8:11 81:9,20,23  
 82:15  
**cti (5)** 1:14 3:11 57:23  
 60:16 62:20  
**culpability (2)** 42:15  
 46:21  
**culpable (1)** 41:14  
**cure (1)** 65:16  
**current (5)** 59:16,17,21  
 66:3 67:3  
**currently (1)** 1:21  
**curry (1)** 8:1  
**custody (1)** 2:25  
**cut (2)** 25:5 80:15

---

**D**

---

**damage (20)** 12:23 13:4  
 14:10 15:16,22 16:24  
 17:5,13 18:2,9,12 19:1  
 20:4 21:22 22:7 23:18  
 30:5 64:19 75:15  
 76:11  
**date (3)** 2:24 82:13,14  
**dated (2)** 36:15 37:22  
**day (1)** 10:2  
**days (2)** 67:8 76:19  
**deal (11)** 1:6 9:2 18:22  
 32:8 55:4 58:12 59:13  
 60:3,7,8,19  
**dealing (6)** 10:10 13:24  
 15:8,21 58:7 65:3  
**deals (1)** 39:3  
**dealt (1)** 60:25  
**deaths (2)** 41:4 51:2  
**debate (1)** 24:22  
**debating (1)** 31:7  
**deceased (1)** 41:7  
**decide (5)** 17:17 25:18  
 28:13 80:9,24  
**decided (2)** 32:12 79:9

**decision (12)** 14:14  
 26:24 31:18 32:1  
 45:19 57:25 59:19  
 65:12 67:11 70:25  
 71:14 77:20  
**decisions (8)** 16:5 29:1  
 48:22 58:4 59:18  
 61:15 77:13 80:7  
**defer (1)** 70:25  
**deference (4)** 52:12,20  
 53:2,2  
**defers (1)** 45:15  
**degree (1)** 29:15  
**delay (2)** 5:2,4  
**delaying (1)** 5:23  
**deliberate (1)** 41:16  
**demands (1)** 41:24  
**democratic (1)** 16:3  
**demonstrated (2)** 29:20  
 77:14  
**demonstrates (2)**  
 24:17,21  
**deny (2)** 33:8,16  
**departing (1)** 18:15  
**department (1)** 6:25  
**depend (1)** 26:6  
**depending (1)** 58:16  
**depth (1)** 40:16  
**description (2)** 46:12  
 74:13  
**designed (2)** 9:6 19:15  
**desirability (5)** 14:24,25  
 39:10 79:19,21  
**despite (5)** 30:24  
 63:14,17 75:10,13  
**detail (4)** 5:9 11:18  
 52:3 58:15  
**detailed (6)** 12:5 18:13  
 58:6,6,10 72:6  
**details (1)** 3:5  
**detaim (1)** 82:19  
**determinative (1)** 45:8  
**determine (5)** 11:8,14  
 25:19 58:25 73:4  
**determined (5)** 9:8 54:6  
 61:17,20,22  
**determines (1)** 66:5  
**detrimentally (1)** 16:9  
**developed (3)** 39:5 44:7  
 73:25  
**device (1)** 80:1  
**di (1)** 7:15  
**didnt (2)** 39:16 63:21  
**differ (1)** 58:15  
**difference (6)** 22:9  
 24:5,6,9,9,23  
**different (9)** 16:12  
 33:12 34:25 54:24,24  
 56:18 59:21 67:8 77:8  
**difficult (3)** 37:13 55:16  
 58:8  
**difficulty (3)** 12:9 38:6  
 55:14  
**diminished (1)** 75:23  
**diplomatic (1)** 15:8  
**direct (1)** 4:7  
**directed (6)** 4:7  
 9:12,19,20,22,25  
**directions (2)** 9:5 10:4  
**directly (1)** 78:6  
**disagree (1)** 28:3  
**disagreement (2)** 28:11  
 29:24

**discerned (1)** 20:11  
**disclose (1)** 26:14  
**disclosed (10)** 17:15  
 23:21 34:8,21  
 35:15,20 53:13 61:20  
 64:3,4  
**disclosing (1)** 61:25  
**disclosure (21)** 12:23  
 13:24 15:7,10  
 16:19,19,21 17:6  
 21:24 23:11 24:19,25  
 26:10 27:6 32:11  
 51:16 62:24 71:17,19  
 74:15 75:17  
**discreditable (1)** 41:14  
**discussing (1)** 52:24  
**discussions (1)** 51:12  
**disposal (1)** 24:3  
**dispute (5)** 11:2 12:19  
 13:8 20:13 71:24  
**dissemination (2)**  
 47:2,10  
**dissolve (1)** 67:9  
**dissuading (1)** 80:10  
**distance (1)** 51:10  
**distinct (1)** 61:18  
**distinction (3)** 27:18  
 31:11 33:20  
**distinguished (1)** 26:4  
**distorted (8)** 47:8,12  
 48:9 59:2,7 61:14  
 67:3,15  
**distortion (2)** 55:17,23  
**distracted (1)** 33:25  
**divider (1)** 36:20  
**document (13)** 14:22  
 15:7 36:17 37:1,19  
 38:13,13,14 41:22  
 44:20,21 45:10 50:8  
**documentation (3)**  
 36:10 39:3 42:2  
**documents (12)** 36:13  
 37:22 49:25 50:5,7  
 53:15,16 58:18,21  
 61:21 62:1,24  
**does (12)** 6:4 21:17,17  
 27:21 28:8 33:6 52:21  
 60:6 65:16 66:6,20  
 75:13  
**doesnt (8)** 30:14  
 31:3,4,5 33:3,19 34:18  
 80:3  
**doing (4)** 14:1 24:15  
 65:20 80:5  
**domain (20)** 11:13  
 15:25 18:22 23:15  
 25:14 39:1 40:9  
 42:3,24,25 43:2,19  
 44:2,2 48:20,22 49:5  
 50:2 69:12,18  
**dominic (1)** 50:8  
**done (14)** 23:2 26:25  
 29:3 31:25 37:11 40:2  
 51:24 53:8 66:3  
 73:7,15 76:2,3 79:13  
**dont (25)** 5:16 15:21  
 20:12,14 27:24  
 30:14,18 33:8,16,23  
 46:9 51:9 53:13,14,21  
 54:14 55:21 56:11  
 57:18 58:17,20,21,23  
 59:4 80:15  
**doubt (9)** 5:4 11:11

24:1 43:12 67:7 75:8  
 77:12,19 80:7  
**down (11)** 17:20,23  
 34:23 37:14 45:10  
 50:22 60:13 63:6 68:8  
 72:13 79:5  
**draw (1)** 27:17  
**drive (1)** 24:13  
**drury (1)** 8:5  
**du (1)** 8:3  
**due (5)** 50:25 52:12,20  
 53:2,2  
**duplicate (1)** 50:19  
**during (6)** 3:13 4:10,15  
 42:5 49:2 60:19  
**duty (1)** 41:3

---

**E**

---

**eadie (25)** 6:25  
 12:3,4,13 14:17 20:25  
 21:8 26:8 27:16 30:16  
 31:4 32:22 33:1,8,12  
 34:2,10 74:21,22  
 76:23 77:3 79:11  
 80:10 83:7,18  
**earlier (3)** 70:2 73:17  
 78:18  
**echr (1)** 76:1  
**effect (10)** 15:3 21:17  
 41:3 43:16 44:13  
 62:19,23 63:9,9 67:19  
**effective (4)** 47:7 63:1  
 64:14,18  
**effectively (3)** 16:13  
 30:25 43:19  
**efficiently (1)** 82:12  
**efforts (1)** 10:5  
**eighth (1)** 3:3  
**eildih (1)** 7:12  
**either (3)** 6:4 42:2  
 80:18  
**elaine (1)** 7:12  
**elegant (1)** 26:18  
**element (1)** 41:10  
**elements (1)** 13:12  
**else (3)** 11:24 68:20  
 74:19  
**elsewhere (1)** 64:21  
**emanating (2)** 43:19,20  
**embarrassing (1)** 48:1  
**eminent (2)** 42:4 48:25  
**empathic (1)** 35:14  
**emphasise (7)** 11:7 40:1  
 41:5 42:8 45:24 75:19  
 81:24  
**emphasised (1)** 11:10  
**enable (3)** 35:21 76:4  
 79:3  
**enabled (1)** 78:19  
**enabling (1)** 13:19  
**end (14)** 6:16 10:17  
 13:17,17 25:9 26:7  
 30:8 37:11 54:5 61:2  
 62:5 64:11 71:6 80:9  
**endorse (1)** 35:6  
**engage (2)** 20:12,23  
**engaged (3)** 2:22 15:13  
 18:14  
**engine (2)** 24:12,15  
**english (1)** 8:7  
**enormously (1)** 50:6  
**enough (2)** 48:13 79:9  
**enquiry (1)** 82:11

**ensure (7)** 3:10 4:4 9:6  
 10:6 41:13 49:3 80:2  
**ensuring (2)** 1:14 13:2  
**entails (1)** 21:25  
**entertain (1)** 55:4  
**entirely (15)** 21:2  
 23:5,18 24:11 26:5  
 29:21 34:1 39:9 52:10  
 65:20 66:2,4 67:6  
 72:18 74:25  
**entirety (2)** 57:13 71:4  
**entitled (3)** 45:7 46:2  
 67:8  
**equally (6)** 14:8 15:14  
 52:25 57:21 79:17,20  
**equipment (1)** 36:5  
**error (1)** 28:18  
**essence (1)** 24:23  
**essential (1)** 15:11  
**essentially (1)** 12:16  
**established (2)** 18:12  
 20:3  
**europe (1)** 8:9  
**even (7)** 1:5 20:15 30:9  
 34:19,20 53:13 64:4  
**event (4)** 25:5 32:3,18  
 41:21  
**events (1)** 40:3  
**eventuality (1)** 25:2  
**ever (4)** 23:14 24:19  
 25:12,12  
**every (2)** 58:7 70:15  
**everybody (3)** 1:11 51:4  
 68:19  
**everyone (10)** 3:25 5:11  
 6:20 10:8 37:16 55:15  
 67:7 69:2,13 73:18  
**everything (5)** 25:17  
 55:13 71:9 79:16,20  
**evidence (8)** 17:18  
 22:19 23:2 33:6  
 63:13,24 65:5 78:16  
**exactly (1)** 26:11  
**examination (1)** 19:22  
**examined (1)** 22:24  
**examining (1)** 19:25  
**example (15)** 15:23  
 16:9 18:3 28:12  
 54:18,25 55:2,25  
 56:4,8 58:9 65:21,24  
 66:24 78:9  
**examples (2)** 54:13  
 56:20  
**except (1)** 33:5  
**exceptional (6)** 16:17  
 17:14 47:13 67:24  
 68:2 78:1  
**exceptionality (1)** 28:10  
**excluded (4)** 19:20  
 32:7,7 63:20  
**excluding (1)** 27:9  
**exclusion (2)** 24:2,9  
**exclusionary (2)** 19:23  
 22:12  
**exclusive (1)** 54:2  
**executive (2)** 45:13,18  
**exercise (12)** 4:1 18:4  
 25:4 26:20 44:17,18  
 45:1 49:3 69:22 70:18  
 71:17 72:21  
**exercised (2)** 43:10  
 66:10  
**exist (3)** 4:2 16:2 27:21

existence (4) 15:22  
 16:16 21:17 55:1  
 exists (2) 12:22 13:18  
 expedition (1) 1:9  
 experience (2) 15:20  
 52:15  
 experienced (1) 3:19  
 expert (5) 26:23,23  
 28:3 29:11 30:9  
 expertbased (1) 17:4  
 expertise (8) 15:20  
 27:12,20 28:22 35:9  
 48:3,9,12  
 explain (1) 30:4  
 explained (2) 11:3 17:1  
 explanation (1) 18:14  
 explosions (1) 1:13  
 exposed (2) 30:6 41:15  
 express (3) 5:12  
 63:14,17  
 expressed (1) 65:16  
 expressing (1) 3:9  
 expression (3) 42:14  
 46:14,15  
 expressly (2) 22:21  
 47:12  
 extant (3) 65:6 66:7,21  
 extent (9) 11:17 15:22  
 16:16 27:21 35:11  
 50:23 53:15 58:22  
 60:10  
 extraordinarily (2)  
 28:2,5  
 extremely (1) 13:22  
 extremism (1) 13:21

**F**

facilitating (1) 19:9  
 factor (8) 28:13  
 33:9,16,21 71:25  
 72:13,15 73:1  
 factored (2) 23:13  
 24:20  
 factors (1) 32:11  
 factual (1) 53:9  
 failings (1) 54:23  
 fair (1) 39:8  
 fairness (2) 1:16 3:24  
 fall (1) 54:7  
 familiar (1) 59:10  
 families (25)  
 7:10,16,20,23,24 9:12  
 10:21 26:11 33:17  
 39:25 42:25 44:3  
 46:13 47:11 48:16  
 51:17 54:3 59:7 62:15  
 69:5 74:23 78:2  
 79:16,20 80:4  
 family (10) 7:20,25  
 8:1,4 55:11 56:3,13  
 72:3 81:3 82:2  
 far (24) 13:7 30:16,17  
 36:9 38:1,22 40:20  
 41:13 43:23 44:8  
 45:1,9 47:5,7 48:14,15  
 49:15 61:8 64:16 69:1  
 71:2 74:16 79:24  
 82:10  
 fault (4) 12:13 60:18  
 68:18 73:24  
 fawell (1) 7:10  
 fear (3) 51:17 54:3  
 62:22

feature (4) 33:3  
 75:3,5,5  
 features (3) 23:4 28:9  
 41:19  
 feel (3) 46:9 73:15,24  
 felt (1) 73:12  
 few (2) 45:4 76:19  
 fifth (1) 2:22  
 filed (1) 36:14  
 finally (4) 4:3 31:13  
 48:18 73:6  
 find (2) 27:9 57:17  
 fine (3) 37:11 55:20  
 82:2  
 finely (1) 73:3  
 fineness (1) 25:9  
 finish (1) 67:21  
 finished (2) 5:24 58:11  
 finishing (1) 59:12  
 firing (1) 43:22  
 firm (1) 14:9  
 firmly (1) 42:22  
 first (28) 2:2,17  
 10:12,19,25 12:7,22  
 14:11 15:19 18:7  
 25:15 27:18,23 32:1  
 35:6 36:1,14 43:24  
 45:4 54:1 61:25 65:23  
 66:19 69:8,10  
 70:13,20 72:22  
 firstly (1) 74:25  
 flag (10) 26:17 27:1,15  
 31:3,4,5,9,10 46:7  
 69:25  
 flagrant (1) 28:19  
 flavour (1) 14:13  
 flippant (1) 59:5  
 flow (3) 1:25 17:6 25:21  
 focuses (1) 17:16  
 follow (5) 30:1 56:24  
 63:23 69:8 73:10  
 following (2) 9:10 72:20  
 follows (4) 1:22 10:3,12  
 64:1  
 forgive (2) 39:7 40:23  
 forgotten (1) 63:2  
 form (5) 28:10 33:17  
 35:12 64:5 78:1  
 formally (2) 4:24 9:2  
 formulation (1) 74:12  
 fortified (1) 65:10  
 forward (1) 76:25  
 four (3) 11:8 70:19 78:9  
 fourth (5) 2:21 4:3  
 66:13 68:2 70:19  
 fourthly (1) 10:21  
 framework (2) 13:9,11  
 francesco (1) 7:15  
 frankly (2) 34:20 55:5  
 Friday (1) 1:1  
 friends (1) 39:15  
 front (3) 40:23 51:4  
 52:21  
 fulfil (1) 24:3  
 full (7) 22:25 25:20  
 35:21 41:13 50:23  
 76:8 78:16  
 fuller (1) 78:25  
 fully (4) 12:25 17:1  
 18:10 76:13  
 function (6) 24:4  
 31:6,8,10 76:7,12  
 functions (4) 13:3 23:9  
 62:22

75:24 77:7  
 further (18) 5:8 11:10  
 44:8 45:10 46:10  
 55:16,19 59:1,12  
 61:23,24 68:22 72:5,7  
 74:9,21 83:15,17  
 future (4) 19:13 58:5,14  
 59:19

**G**

game (1) 19:20  
 gateway (1) 12:18  
 gave (1) 58:10  
 general (3) 15:6 38:8  
 82:2  
 generally (1) 69:6  
 generic (1) 38:8  
 georgina (1) 8:4  
 get (6) 23:14 30:18  
 47:4 55:15,17,19  
 gist (2) 18:3 64:6  
 gisting (1) 18:22  
 give (9) 4:15 30:7,12  
 52:12 53:2 54:20 58:6  
 63:12 69:5  
 given (21) 10:9 12:6  
 14:11 15:2 16:10  
 17:25 18:1,21  
 21:4,10,13 22:8 23:19  
 24:8 27:4,12 30:9  
 35:10 41:3 54:22 78:2  
 giving (1) 77:5  
 gmp (13) 4:18  
 9:11,17,19,23 11:21  
 35:6,8,17 70:16,22  
 72:1 74:12  
 goes (3) 33:7 49:16  
 64:3  
 going (21) 10:10 20:25  
 26:7,13 30:18  
 32:3,6,13 36:12  
 45:4,21 47:17 48:5,13  
 54:11 58:3 60:7,24  
 61:24 62:2 76:25  
 goldring (1) 72:12  
 gone (2) 18:4 31:25  
 good (8) 12:13 14:7  
 19:11 20:5 47:16,16  
 48:13 65:21  
 gordon (2) 7:15 9:13  
 government (7) 16:6,7  
 28:23,24 29:12 31:19  
 67:9  
 grainger (1) 68:1  
 grant (1) 20:21  
 grateful (12) 8:21 10:5  
 35:1 39:14 49:21  
 50:13 52:7,8 66:14  
 68:12 73:11 81:14  
 greaney (23) 1:3,5,9  
 5:16 6:19 9:2 10:24,25  
 37:4 60:5,21,23 61:2  
 68:16,18,22,23 73:23  
 81:8,13,19 83:5,15  
 great (2) 35:23 48:11  
 greater (8) 7:2 9:7  
 10:20 24:13 69:15  
 70:7 81:11,21  
 greatest (3) 44:14,23  
 59:6  
 green (1) 12:14  
 grenfell (1) 65:21  
 grieve (1) 50:8

group (1) 43:20  
 guarantee (1) 58:8

**H**

hadnt (1) 27:10  
 hair (1) 28:15  
 halt (1) 66:17  
 hammond (1) 78:10  
 hampered (1) 41:11  
 hand (12) 14:15 19:7  
 26:14,16 27:24  
 46:13,17,23 49:9  
 51:14,16 79:13  
 hands (1) 28:24  
 happen (3) 6:16 76:24  
 80:3  
 happened (2) 26:12  
 49:18  
 happy (1) 61:3  
 hard (1) 48:4  
 harm (5) 14:1 15:6  
 16:19 71:18 74:14  
 harrison (1) 8:5  
 hashem (15)  
 1:9,17,20,23  
 2:6,9,13,25  
 3:2,5,16,24 4:6,22  
 70:23  
 havent (4) 33:1 51:22  
 53:11 66:3  
 having (15) 5:2 12:9  
 21:25 25:15 26:10  
 27:12 29:3,18 31:24  
 38:18 61:20 62:19  
 66:1 75:22 76:20  
 heading (3) 37:2,3  
 71:15  
 hear (15) 8:16,18 12:12  
 33:6,18 36:7 37:13  
 48:5 58:3,4 61:1 63:13  
 65:5 79:16 80:14  
 heard (6) 31:23 36:9  
 47:5 63:24 71:23  
 80:13  
 hearing (26) 2:11,12  
 3:11,14,23 4:5,8,10  
 5:24 6:16,16 8:24  
 9:5,8 10:14 11:4 12:9  
 14:12 22:22 42:6  
 43:23 57:5 62:17  
 70:13 79:20 82:22  
 hearings (14) 3:13 47:4  
 54:7 60:4  
 63:13,18,18,25  
 64:12,21 67:18,22  
 68:3,7  
 heavily (2) 14:25 57:1  
 heavy (2) 42:5 55:22  
 heightened (1) 44:4  
 held (1) 67:1  
 help (4) 26:1 27:12 30:9  
 50:5  
 helped (2) 26:22 61:13  
 helpful (5) 6:14 36:10  
 38:3 66:17 74:1  
 helpfully (3) 26:3 37:8  
 39:22  
 henderson (1) 6:22  
 here (25) 3:20,21 5:15  
 6:4,22,24 11:5  
 13:15,24 17:17 18:6  
 21:14 23:7 40:19  
 50:13,20 51:7,11

52:14,24 54:15 56:22  
 68:8 76:25 81:10  
 hett (1) 7:13  
 hierarchy (1) 18:17  
 high (1) 26:3  
 highest (2) 41:24,25  
 highlight (1) 38:16  
 highly (5) 5:7 24:22  
 38:21 67:24 68:2  
 hills (1) 82:9  
 hillsborough (1) 65:23  
 hogan (1) 8:3  
 hold (1) 46:16  
 holding (1) 46:12  
 holdings (1) 8:9  
 holds (2) 19:7 41:9  
 home (8) 2:18 6:25  
 23:8 25:8 58:18 65:11  
 77:5,5  
 hope (6) 5:10 35:25  
 36:4 59:4 67:17 69:2  
 hopefully (1) 36:16  
 horse (4) 34:14 49:9,11  
 72:16  
 hour (2) 4:14 5:5  
 hours (1) 76:24  
 house (3) 15:4,5 49:25  
 housekeeping (2) 1:4  
 83:3  
 howe (1) 7:16  
 however (7) 11:18 24:5  
 45:25 52:17 66:19  
 73:2 77:3  
 hudgett (1) 7:22  
 human (1) 63:15  
 humanly (1) 33:18  
 humiliation (1) 47:24  
 hurdle (1) 16:23  
 hurley (1) 7:11  
 husband (2) 7:13,25  
 hypothetical (2) 32:5  
 34:1

**I**

identified (3) 2:14,16  
 3:17  
 identify (2) 1:5 7:6  
 identity (2) 2:17 55:1  
 ie (1) 22:22  
 ignore (2) 23:24 24:11  
 ignoring (1) 72:21  
 im (20) 8:21 20:25  
 26:13 30:16 31:19  
 32:10,15 36:12 37:6,8  
 49:21 51:20 52:7  
 54:11,14 62:9 65:9,13  
 67:17 68:1  
 immediately (2) 27:7  
 38:15  
 imminent (1) 1:25  
 immunity (18) 12:19  
 19:19,23 20:2 45:18  
 49:11 51:7 52:1 53:24  
 54:4,19 57:5,14  
 59:14,19 61:16,19  
 77:12  
 impact (1) 55:5  
 impede (1) 14:2  
 impeded (1) 2:6  
 imperatives (1) 64:17  
 imperfect (1) 68:7  
 implications (2) 27:5,13  
 implicitly (1) 43:20

import (1) 59:6  
 importance (18) 2:3,8  
 13:5 17:11,24 18:17  
 33:17 35:19 38:18  
 39:21 40:2 42:9 45:1  
 46:25 47:1  
 75:11,13,23  
 important (15) 5:3 23:2  
 26:4 27:3 33:21 38:24  
 39:3 44:22 49:15  
 52:9,25 62:4 69:22  
 75:3,5  
 importantly (2) 39:1  
 63:3  
 impossible (3) 57:18  
 66:6 71:8  
 impression (1) 47:4  
 inaudible (8) 47:8,12  
 48:9 59:2,7 61:13  
 67:3,14  
 inaudiblydistorted (1)  
 8:10  
 include (1) 22:16  
 including (4) 3:14 18:22  
 47:18 78:17  
 inconceivable (3) 14:23  
 16:20 59:18  
 incumbent (1) 67:6  
 incursion (1) 5:2  
 independent (6) 41:6  
 43:10 52:22 53:1  
 69:4,22  
 index (1) 47:22  
 index (1) 83:1  
 indicate (6) 4:11 6:15  
 8:21 40:3 49:1 75:12  
 indicated (23) 6:1,6  
 8:12 9:10 13:1 17:12  
 19:5 20:5,20 23:7,8  
 25:8 28:21 37:21  
 38:14 40:13 44:5  
 48:25 60:6 66:14,15  
 70:2,14  
 indicates (1) 28:6  
 indicating (1) 58:23  
 indication (3) 52:8  
 66:20 77:6  
 indications (1) 24:7  
 individual (2) 52:3 82:1  
 inelegant (1) 49:8  
 inelegantly (1) 43:22  
 influence (1) 62:6  
 influenced (1) 43:9  
 inform (2) 19:21 50:4  
 information (16) 12:20  
 13:25 17:6 30:5,9  
 31:23 35:11,15 38:10  
 43:18 56:8 74:6,9  
 75:17 79:9 82:14  
 informer (1) 55:1  
 initial (1) 74:10  
 inquest (33) 3:13,20  
 6:21 9:21,24 13:1  
 16:15 19:24 20:18  
 21:14,16 22:2,11  
 23:10 26:11 31:22  
 32:8 33:14 40:7,10  
 43:25 57:17 58:11,25  
 60:1 61:22,24  
 65:20,24 66:6 71:7  
 78:5 79:15  
 inquests (8) 1:15 19:21  
 22:18 34:15 47:20,21

65:22 66:16  
 inquirer (2) 75:21 76:7  
 inquirers (1) 77:12  
 inquiries (7) 22:3 65:22  
 66:23 71:21 78:7,14  
 79:2  
 inquiring (1) 32:9  
 inquiry (67) 20:9,16,18  
 21:6,18,20  
 22:3,5,20,23  
 23:10,13,19,25  
 24:16,19 25:3,16  
 26:13 31:14  
 32:3,13,24 33:7,14  
 34:2,6,10 40:8,11  
 43:25 50:4 51:8,24  
 59:21,25 60:11 61:7,9  
 65:4,18,21,24  
 66:2,10,16,22,25 67:1  
 70:18 71:22 72:9  
 73:10 75:4,7 76:9,18  
 77:18,22  
 78:5,10,11,21,24  
 79:7,10,22  
 instance (1) 72:22  
 institute (1) 66:9  
 instituted (1) 65:18  
 institutionally (1) 28:25  
 instructed (4) 3:20  
 7:15,18 8:3  
 intelligence (3) 14:6  
 49:24 50:9  
 intend (1) 4:12  
 intended (1) 68:24  
 intent (1) 14:1  
 interest (46) 2:2 5:3  
 11:12 12:18,23,25  
 13:13,14 15:6 16:24  
 17:15,16 18:19  
 19:19,23 20:2 25:25  
 26:10 29:17 35:19  
 39:10 44:11 45:18  
 49:10 51:7 52:1 53:24  
 54:3,19 55:10 56:3,6  
 57:4,14 59:14,19  
 61:16,18,25 62:1  
 69:11,17 71:17 75:21  
 76:6 77:11  
 interested (7) 1:6 7:4  
 10:5,22 11:19 63:19  
 74:5  
 interesting (3) 20:13,24  
 30:3  
 interests (4) 7:23 56:1  
 64:13 75:24  
 interpret (1) 47:15  
 interrupt (3) 51:20 60:5  
 65:9  
 interrupting (1) 39:7  
 intervene (1) 30:25  
 interviewed (1) 3:5  
 into (27) 2:25 5:3 11:13  
 15:24 18:21,25 21:15  
 22:6 23:15,16 24:10  
 25:11,13 30:2 34:23  
 38:3 40:25 48:18 50:2  
 62:17 67:14 69:12,17  
 71:21 77:17 79:18  
 82:6  
 introduced (1) 28:13  
 introduction (2) 6:19  
 28:5  
 introductions (1) 6:18

investigate (1) 41:3  
 investigated (1) 41:5  
 investigation (6) 35:21  
 41:12 42:13 71:21  
 80:4,8  
 investigations (1) 56:4  
 investigative (1) 49:6  
 invitation (1) 5:13  
 invite (6) 7:5 10:18  
 11:24 73:16,20 81:8  
 invited (1) 60:19  
 inviting (1) 11:14  
 involved (6) 47:19  
 50:23 51:6,11 58:24  
 70:5  
 involves (1) 13:4  
 involving (1) 14:4  
 ireland (1) 78:8  
 irrational (1) 28:13  
 irrationality (1) 31:1  
 irrelevant (3) 52:23  
 64:12 66:11  
 isat (1) 67:11  
 issues (29) 10:9,11 13:6  
 17:17,19,22 19:3,4,22  
 25:18 40:7,13  
 45:11,16 51:7 53:21  
 54:1,9,10,17,23 55:7  
 58:25 59:14,25 63:17  
 68:19 70:13 73:25  
 item (1) 52:1  
 its (53) 5:11 6:1 13:3,17  
 14:15,17,23 20:24  
 21:24 23:18 25:24,25  
 27:21,22 28:16,25  
 29:7,23 30:3 31:2  
 32:4,13,18,19  
 33:7,13,14,20 36:20  
 37:11 39:8 44:25  
 51:23 52:21,25  
 53:13,15,15 57:12,24  
 59:17 62:4,8  
 63:2,7,17,20 67:12  
 68:18 70:24 71:4  
 75:23 82:1  
 itself (3) 3:6 13:17,18  
 ive (4) 22:8,11 44:4  
 81:19

43:6 46:5 49:21  
 50:9,14 51:20  
 55:12,20 58:1 59:8  
 60:18 61:1 62:7,10  
 65:8,14 68:12,17  
 73:18 74:18 76:22  
 77:1 79:5,12 80:12,23  
 81:12,14 82:5,14,20  
 jones (1) 7:11  
 joseph (1) 8:9  
 judge (6) 2:18 23:1  
 26:17 44:22 45:11,25  
 judgement (3) 15:21  
 28:17 43:11  
 judgements (2) 16:8,16  
 judges (1) 26:4  
 judgment (13) 4:23  
 27:8 58:6,7,13,14,15  
 59:6 61:7 69:22  
 72:11,12 77:15  
 judicial (5) 17:16 41:6  
 45:7 52:23 65:23  
 judicially (1) 63:7  
 judiciary (2) 45:13,15  
 july (9) 2:11 3:12 9:5  
 11:4,11 36:15,17 53:6  
 70:3  
 jurisdiction (12) 42:15  
 62:5,6,18 63:5,12,13  
 64:2,12,24 67:24 68:6  
 justification (1) 22:6  
 justified (1) 45:19  
 justly (1) 13:2

41:8 42:4,11,12  
 44:14,24 46:11 48:7  
 53:7 76:4,4  
 learning (3) 19:10,11,14  
 least (4) 25:25 43:20  
 44:7 49:4  
 leave (2) 23:6 60:20  
 leczkowski (1) 7:20  
 led (2) 44:6,7  
 lees (2) 7:13,17  
 leeway (1) 44:18  
 left (1) 27:24  
 lefthand (1) 27:25  
 legal (6) 11:2 35:7 48:2  
 51:6 56:22 65:17  
 legally (1) 63:8  
 legislation (1) 3:3  
 legislative (1) 16:6  
 legislature (5)  
 63:11,16,21,24 68:6  
 legs (1) 61:24  
 length (1) 11:3  
 less (4) 24:2 32:15 56:7  
 76:8  
 lesser (1) 29:15  
 lessons (6) 19:10,12,15  
 22:25 25:19 76:3  
 lest (1) 74:25  
 let (4) 20:17 45:23  
 75:7,22  
 leveson (1) 66:25  
 liam (1) 8:1  
 lie (1) 29:1  
 lies (3) 22:9 26:25 28:23  
 light (6) 12:14 25:19  
 32:2 41:14 50:23  
 77:20  
 lightly (1) 45:20  
 like (9) 1:14 5:24 20:19  
 45:2 46:19,25 60:21  
 77:1 81:5  
 likelihood (1) 67:12  
 likely (1) 62:18  
 limited (4) 4:4 8:9 10:8  
 11:16  
 line (4) 43:22 63:6 68:8  
 72:13  
 lines (2) 40:25 45:4  
 26:12 27:24 40:23  
 42:1,19 44:6 50:4  
 53:7,12,13,14 54:14  
 55:14 56:11 58:20,22  
 64:19 69:2,8,18 70:10  
 76:22  
 knowing (1) 26:11  
 knowledge (2) 38:9  
 54:15  
 known (2) 56:9 81:3  
 knows (1) 1:11

41:8 42:4,11,12  
 44:14,24 46:11 48:7  
 53:7 76:4,4  
 learning (3) 19:10,11,14  
 least (4) 25:25 43:20  
 44:7 49:4  
 leave (2) 23:6 60:20  
 leczkowski (1) 7:20  
 led (2) 44:6,7  
 lees (2) 7:13,17  
 leeway (1) 44:18  
 left (1) 27:24  
 lefthand (1) 27:25  
 legal (6) 11:2 35:7 48:2  
 51:6 56:22 65:17  
 legally (1) 63:8  
 legislation (1) 3:3  
 legislative (1) 16:6  
 legislature (5)  
 63:11,16,21,24 68:6  
 legs (1) 61:24  
 length (1) 11:3  
 less (4) 24:2 32:15 56:7  
 76:8  
 lesser (1) 29:15  
 lessons (6) 19:10,12,15  
 22:25 25:19 76:3  
 lest (1) 74:25  
 let (4) 20:17 45:23  
 75:7,22  
 leveson (1) 66:25  
 liam (1) 8:1  
 lie (1) 29:1  
 lies (3) 22:9 26:25 28:23  
 light (6) 12:14 25:19  
 32:2 41:14 50:23  
 77:20  
 lightly (1) 45:20  
 like (9) 1:14 5:24 20:19  
 45:2 46:19,25 60:21  
 77:1 81:5  
 likelihood (1) 67:12  
 likely (1) 62:18  
 limited (4) 4:4 8:9 10:8  
 11:16  
 line (4) 43:22 63:6 68:8  
 72:13  
 lines (2) 40:25 45:4  
 26:12 27:24 40:23  
 42:1,19 44:6 50:4  
 53:7,12,13,14 54:14  
 55:14 56:11 58:20,22  
 64:19 69:2,8,18 70:10  
 76:22  
 knowing (1) 26:11  
 knowledge (2) 38:9  
 54:15  
 known (2) 56:9 81:3  
 knows (1) 1:11

labouring (1) 55:22  
 lacuna (1) 65:17  
 large (3) 27:9 31:2 47:8  
 larger (1) 29:25  
 last (7) 4:8 6:14 8:24  
 13:9 25:24 45:24  
 55:24  
 late (1) 49:11  
 lawyers (1) 63:20  
 lead (1) 16:13  
 learned (18) 22:25 23:1  
 25:19 39:2,4,15 40:12

41:8 42:4,11,12  
 44:14,24 46:11 48:7  
 53:7 76:4,4  
 learning (3) 19:10,11,14  
 least (4) 25:25 43:20  
 44:7 49:4  
 leave (2) 23:6 60:20  
 leczkowski (1) 7:20  
 led (2) 44:6,7  
 lees (2) 7:13,17  
 leeway (1) 44:18  
 left (1) 27:24  
 lefthand (1) 27:25  
 legal (6) 11:2 35:7 48:2  
 51:6 56:22 65:17  
 legally (1) 63:8  
 legislation (1) 3:3  
 legislative (1) 16:6  
 legislature (5)  
 63:11,16,21,24 68:6  
 legs (1) 61:24  
 length (1) 11:3  
 less (4) 24:2 32:15 56:7  
 76:8  
 lesser (1) 29:15  
 lessons (6) 19:10,12,15  
 22:25 25:19 76:3  
 lest (1) 74:25  
 let (4) 20:17 45:23  
 75:7,22  
 leveson (1) 66:25  
 liam (1) 8:1  
 lie (1) 29:1  
 lies (3) 22:9 26:25 28:23  
 light (6) 12:14 25:19  
 32:2 41:14 50:23  
 77:20  
 lightly (1) 45:20  
 like (9) 1:14 5:24 20:19  
 45:2 46:19,25 60:21  
 77:1 81:5  
 likelihood (1) 67:12  
 likely (1) 62:18  
 limited (4) 4:4 8:9 10:8  
 11:16  
 line (4) 43:22 63:6 68:8  
 72:13  
 lines (2) 40:25 45:4  
 26:12 27:24 40:23  
 42:1,19 44:6 50:4  
 53:7,12,13,14 54:14  
 55:14 56:11 58:20,22  
 64:19 69:2,8,18 70:10  
 76:22  
 knowing (1) 26:11  
 knowledge (2) 38:9  
 54:15  
 known (2) 56:9 81:3  
 knows (1) 1:11

labouring (1) 55:22  
 lacuna (1) 65:17  
 large (3) 27:9 31:2 47:8  
 larger (1) 29:25  
 last (7) 4:8 6:14 8:24  
 13:9 25:24 45:24  
 55:24  
 late (1) 49:11  
 lawyers (1) 63:20  
 lead (1) 16:13  
 learned (18) 22:25 23:1  
 25:19 39:2,4,15 40:12

lords (1) 15:4  
 lose (1) 50:21  
 lot (1) 34:18  
 loved (2) 49:18 78:20  
 lovells (1) 8:3

**M**

macleod (1) 7:12  
 maintain (1) 44:10  
 maintains (1) 43:16  
 makes (7) 16:11 19:6  
 34:22 37:12 39:9 52:9  
 55:16  
 making (8) 28:16 35:23  
 38:8 43:1 60:16 61:15  
 67:11 75:9  
 managed (3) 2:10 21:22  
 68:3  
 management (5) 25:20  
 57:13,25 66:18 71:14  
 manchester (23)  
 1:12,18 3:22 5:18  
 6:4,6,11,22 7:2,5,9  
 8:14 9:7 10:20 35:25  
 40:20 41:23 68:15  
 69:15 70:7 80:18  
 81:11,21  
 many (2) 14:17 47:18  
 marcin (1) 7:12  
 margin (7) 29:2,5,7,9,24  
 30:24 31:2  
 18:22 19:8 22:9 54:25  
 56:7 59:23 67:11  
 75:17 76:11,18,24  
 78:17,19,25 80:1  
 military (1) 47:21  
 mind (8) 27:14 42:23  
 46:6 66:20 69:21  
 77:8,23 78:6  
 minded (3) 66:15,20  
 73:10  
 minds (2) 66:23,25  
 minimised (1) 64:20  
 minister (6) 14:21 18:8  
 26:22 45:6 46:2 61:11  
 ministerial (2) 17:20  
 69:24  
 ministers (3) 15:19  
 66:22,24  
 minute (1) 55:12  
 minutes (2) 81:12,13  
 mirror (1) 39:17  
 mistake (1) 31:24  
 misunderstanding (1)  
 33:11  
 misunderstood (4)  
 38:20 43:13 57:10  
 74:25  
 mohamed (6) 11:9  
 13:10 45:9 64:7  
 69:10,24  
 moment (3) 36:24 65:6  
 66:8  
 months (1) 1:22  
 more (21) 4:14 5:5 12:5  
 18:21,25 24:1 26:18  
 34:22 37:13 40:16,20  
 42:2 55:16 58:7 62:23  
 69:6 73:3 76:2,3,22  
 82:4  
 moreover (3) 9:25  
 11:10 67:2  
 morning (2) 52:19 57:7

mciver (1) 7:12  
 mean (9) 28:12 31:3,4,5  
 32:22 52:21 63:24  
 64:5 69:14  
 meaning (1) 1:23  
 means (6) 33:5 42:3  
 66:10 77:16 79:15  
 80:3  
 mechanism (1) 71:20  
 media (3) 3:9 4:9 53:20  
 meet (1) 64:9  
 meeting (1) 67:23  
 megan (1) 7:11  
 member (2) 5:14,17  
 members (3) 55:11 56:2  
 81:3  
 mentioned (3) 57:7,7  
 78:4  
 mentioning (1) 46:6  
 mere (1) 47:3  
 merely (1) 21:24  
 merits (1) 40:18  
 message (1) 68:16  
 met (3) 40:10 64:14  
 67:23  
 method (2) 56:8 65:2  
 mi5 (1) 27:9  
 mic (2) 37:12 55:16  
 michelle (1) 7:25  
 microphone (1) 12:14  
 might (17) 17:6,18  
 18:22 19:8 22:9 54:25  
 56:7 59:23 67:11  
 75:17 76:11,18,24  
 78:17,19,25 80:1  
 military (1) 47:21  
 mind (8) 27:14 42:23  
 46:6 66:20 69:21  
 77:8,23 78:6  
 minded (3) 66:15,20  
 73:10  
 minds (2) 66:23,25  
 minimised (1) 64:20  
 minister (6) 14:21 18:8  
 26:22 45:6 46:2 61:11  
 ministerial (2) 17:20  
 69:24  
 ministers (3) 15:19  
 66:22,24  
 minute (1) 55:12  
 minutes (2) 81:12,13  
 mirror (1) 39:17  
 mistake (1) 31:24  
 misunderstanding (1)  
 33:11  
 misunderstood (4)  
 38:20 43:13 57:10  
 74:25  
 mohamed (6) 11:9  
 13:10 45:9 64:7  
 69:10,24  
 moment (3) 36:24 65:6  
 66:8  
 months (1) 1:22  
 more (21) 4:14 5:5 12:5  
 18:21,25 24:1 26:18  
 34:22 37:13 40:16,20  
 42:2 55:16 58:7 62:23  
 69:6 73:3 76:2,3,22  
 82:4  
 moreover (3) 9:25  
 11:10 67:2  
 morning (2) 52:19 57:7

morris (2) 14:13,20  
 most (7) 16:17 18:20  
 20:7 35:10 54:20 57:1  
 71:11  
 mother (2) 7:12 8:2  
 move (3) 44:8 55:21  
 60:3  
 moved (1) 60:25  
 ms (13) 5:19 6:1,6,9,11  
 7:6,8 8:14,15,19 12:9  
 80:20 81:8  
 much (18) 6:13 8:13  
 9:2 25:4 30:22 33:18  
 35:24 50:14,18,19  
 51:10 62:13 67:5  
 68:12 71:12 74:5  
 80:13 82:5  
 muckier (1) 34:17  
 murder (2) 1:11,13  
 must (10) 3:9 44:10  
 50:21 53:1,2 58:13  
 60:15 63:2,3,23  
 mustnt (1) 73:23  
 muted (1) 80:18  
 myself (2) 47:18 81:20

**N**

name (2) 2:17,18  
 namely (2) 19:15 70:11  
 names (1) 2:21  
 naming (1) 46:23  
 narrower (3) 29:6,9,23  
 national (63)  
 13:14,15,16,18 14:10  
 15:8,12,17  
 16:8,17,20,22,25  
 17:5,9,13,22  
 18:2,9,16,23 19:6 20:4  
 21:19,22,23 22:4,7,14  
 23:23 24:13 25:14,21  
 27:6,14,20,25  
 28:4,14,18 29:6,14  
 30:5,11,14 44:12  
 45:14 46:12,16  
 47:6,17,20,23,24  
 49:19 52:16 55:6  
 56:16,17 64:20 71:18  
 74:14 76:11  
 nature (6) 10:10 15:22  
 16:16 27:22 30:20  
 80:9  
 near (3) 30:19 58:5,13  
 necessarily (1) 14:6  
 necessary (4) 4:17 5:11  
 20:24 71:4  
 need (15) 4:1,4 13:16  
 20:12,14 24:12,14  
 30:16 39:25 46:9  
 57:18 70:15 71:9 73:4  
 80:13  
 needs (3) 20:23 21:8  
 67:2  
 neil (1) 7:1  
 neither (1) 43:25  
 nell (1) 7:11  
 nelson (1) 78:8  
 neutral (1) 33:3  
 never (2) 31:9 32:19  
 nevertheless (1) 79:8  
 next (1) 64:8  
 nobody (1) 80:20  
 nondisclosure (1) 32:12  
 none (1) 68:16

nonetheless (4) 3:25  
 46:14 71:10 72:16  
 nor (2) 33:6 43:25  
 normal (1) 67:6  
 north (1) 8:6  
 northern (1) 78:8  
 note (1) 58:8  
 noted (1) 81:1  
 nothing (5) 1:15 3:23  
 6:6 38:2 39:2  
 notification (1) 41:15  
 novel (1) 20:22  
 november (1) 1:21  
 number (6) 1:25 2:1  
 42:4 48:24,25 53:8

**O**

objection (1) 57:21  
 observations (2) 46:18  
 47:15  
 obtainable (1) 79:1  
 obvious (7) 11:16 17:1  
 22:22 27:7 28:19 38:6  
 71:22  
 obviously (9) 5:20  
 23:16 50:3 51:22  
 55:13 56:14 70:25  
 79:12 80:15  
 occupation (1) 2:19  
 occur (1) 79:4  
 occurred (2) 5:2 78:10  
 occurs (2) 1:15 25:2  
 offence (1) 2:19  
 offences (1) 2:20  
 office (1) 77:5  
 officer (1) 52:23  
 officers (3) 35:9 48:8,12  
 often (2) 17:19,23  
 oh (1) 65:14  
 okay (6) 6:10 33:10  
 35:24 39:19 58:1  
 68:17  
 olivia (1) 7:24  
 once (4) 14:17 25:10  
 34:20 61:17  
 ones (3) 49:18 73:23  
 78:20  
 open (37) 3:14 5:3 9:11  
 10:1 11:17 17:2  
 18:7,25 20:6,8 26:11  
 27:8 29:21 30:13  
 42:17 44:11 47:2,6,7  
 48:16,16 50:21  
 53:18,19 54:7,16  
 58:12 62:2,2,25 63:3  
 64:13,17 74:10,12  
 75:2 82:22  
 opening (2) 23:22 75:20  
 openly (1) 10:9  
 opens (1) 23:24  
 operates (1) 22:11  
 opportunity (4) 12:7  
 37:21 41:6 82:10  
 opposite (1) 64:22  
 option (2) 21:21 24:16  
 oral (1) 4:13  
 orally (2) 3:23 57:7  
 order (16) 2:12  
 3:7,10,12,17 5:8,23  
 6:5 11:25 14:23 16:21  
 35:20 58:19 73:16  
 76:4 80:24  
 ordered (3) 21:6,8 22:3

ordering (1) 21:24  
ore (1) 33:23  
organisations (1) 43:21  
organs (1) 76:2  
original (2) 8:24 31:25  
others (7) 1:13 2:2  
46:23 50:12 56:9,21  
59:10  
otherwise (8) 4:10,11  
27:14 57:22 65:7  
73:16 76:1 79:1  
ought (4) 4:13 52:12  
57:8 64:10  
outcome (2) 3:6 77:9  
outlined (2) 35:7 51:23  
outrage (2) 50:24 51:3  
outrageous (2) 41:22  
46:19  
outset (2) 32:16 60:6  
outweigh (2) 13:3 14:25  
outweighed (1) 64:18  
over (2) 35:25 66:25  
overplayed (1) 46:24  
overstate (1) 43:7  
overwhelming (1) 79:21  
own (2) 27:14 28:16

P

paid (3) 19:13 75:14  
76:17  
paradigm (1) 16:9  
paragraph (19)  
14:13,19 15:3 16:10  
37:3 40:22 41:1,18  
44:20 45:3,12,22,23  
61:5,11,12 62:11  
72:11 77:15  
paragraphs (4) 36:16,22  
39:6 40:4  
parameters (1) 30:4  
parliamentary (1) 53:19  
part (15) 13:4 15:7  
27:23 34:15 44:7 52:5  
53:24 56:15 73:11  
74:15 76:15 77:18  
79:3,6 80:6  
participate (2) 41:7  
79:16  
participation (4) 41:10  
63:1 64:14,18  
particular (21) 4:1  
10:23 13:5 14:14  
15:18,19 17:24 24:6  
30:4 35:9 36:16 42:9  
50:25 52:1,2 69:7  
70:13 71:1 73:19  
80:15 82:1  
particularly (17) 12:6  
24:17 25:10 29:20  
39:17 40:5 41:25  
42:3,25 44:2,22  
47:9,10,19,21 52:7  
76:1  
partly (1) 49:4  
parts (1) 23:3  
passage (1) 40:22  
passing (1) 41:8  
past (2) 19:10 81:1  
pause (4) 12:11  
37:10,15 80:17  
pay (1) 63:21  
payne (8) 7:3 35:2,3,4,6  
48:7,11 83:9

pays (1) 17:23  
pending (1) 24:25  
people (9) 42:4,23  
43:1,3,21 49:1 68:14  
73:20 81:5  
perform (3) 13:3 75:25  
76:12  
performance (2) 76:6  
77:7  
performed (1) 23:9  
perhaps (11) 14:3,8  
21:3 26:18 32:19  
39:20 46:10 49:9  
57:10 76:1 81:5  
period (1) 76:24  
permissible (1) 63:8  
person (3) 2:19 10:22  
65:11  
persons (6) 1:6 7:4 10:5  
11:19 63:19 74:5  
perspective (1) 66:18  
persuaded (1) 71:10  
pertain (1) 68:8  
pertaining (1) 38:25  
philip (1) 7:21  
phrase (2) 28:6 46:5  
pick (1) 57:6  
picked (1) 36:4  
picking (2) 50:20 55:24  
picture (2) 23:3 25:20  
piece (1) 30:5  
pii (56) 8:25 9:6  
10:12,15,25  
11:8,12,18,23 12:6  
20:10,16 21:15  
22:11,17 23:5 24:8,24  
25:1 31:20  
32:1,6,18,24 33:14  
34:4 35:12,18,23 40:9  
44:9 45:5 48:19 49:3  
50:2 55:25 62:20 64:2  
65:1 68:9 69:12  
70:15,22,24 72:24  
74:4,7,15 75:4,15  
77:19  
79:8,15,17,19,25  
place (6) 2:11,24 59:25  
65:22 80:8 81:4  
placed (5) 42:20,21,24  
44:1 47:25  
plain (2) 11:5 73:8  
plainly (2) 23:5 75:12  
play (3) 14:4 20:10  
52:21  
please (5) 7:6 37:19  
50:4 55:21 69:5  
pleased (1) 57:11  
pm (3) 81:16,18 82:21  
pointing (1) 54:1  
pointless (2) 25:4 38:23  
points (5) 18:7 19:18  
35:4 74:24 78:18  
police (16) 7:3 9:7  
10:20 27:5 42:7,12,16  
43:17 46:22 48:23  
53:22 57:15 69:15  
70:7 81:11,21  
policing (4) 54:10,18  
56:2,13  
political (1) 16:6  
politicians (1) 77:7  
portion (1) 3:14  
position (13) 3:11 9:4

52:11,22 54:15 57:22  
59:2 66:7 68:4 69:4,4  
74:20 77:4  
positively (1) 77:11  
possibility (29) 18:1  
19:10,14 20:9,15,17  
22:6 23:11,19,22  
24:18,20 25:3,7,16,25  
34:6,7 60:10 67:12  
70:17 72:9,22 73:1  
76:17,18,23 77:18  
79:3  
possible (20) 8:17  
21:14,18,21,23 22:2,2  
32:10 33:7,18 39:1  
41:13 54:16 63:5,6  
65:20 71:12 72:19  
74:6 82:16  
possibly (1) 39:11  
posted (1) 11:9  
postponing (1) 2:12  
potential (7) 20:6,7  
42:17 43:23 54:23  
56:16 64:19  
potentially (5) 20:13  
38:5 43:3,22 44:6  
power (8) 5:4 22:20  
63:13 65:4  
66:7,9,11,21  
powerful (2) 13:22  
46:18  
powers (5) 16:2,3 21:4  
52:10,25  
practice (1) 27:3  
precedent (3) 65:19,22  
66:22  
precise (1) 38:10  
precisely (8) 21:14 23:7  
24:3,15 31:5 47:16  
78:21 79:2  
preclude (1) 15:9  
predecessor (1) 65:18  
predecessors (1) 66:3  
preface (2) 38:15 40:6  
preinquest (2) 9:4 11:3  
prejudice (3) 4:5,20  
6:15  
prejudiced (1) 2:6  
prejudicing (1) 3:24  
preparation (2) 1:16  
79:6  
prepared (1) 31:20  
present (8) 3:20 5:17  
6:7,11 7:4 32:23 68:14  
77:3  
press (6) 2:2  
5:15,17,21,22 6:2  
pressure (1) 62:18  
presumably (2) 65:8  
77:1  
prevention (1) 47:24  
prevents (1) 19:24  
previously (1) 46:6  
price (2) 19:13 75:14  
primary (1) 20:10  
principal (1) 72:14  
principle (15) 14:4  
19:23 21:12 22:12  
26:4 30:21 37:2,3,20  
38:14 51:13 52:24  
75:2,11,13  
principles (21) 8:25  
10:12 11:1,2,7,24

12:6,16 16:2 18:6  
25:23 29:22 35:7 38:9  
51:6,11 53:5 56:22  
57:4 63:11 67:6  
prior (3) 56:4,14 81:4  
probably (4) 37:4 73:18  
78:3 80:13  
probed (1) 78:23  
probing (2) 47:22 70:6  
problem (2) 44:1 63:22  
problems (1) 67:23  
procedure (1) 52:5  
proceed (1) 61:23  
proceeding (2) 65:1  
82:12  
proceedings (14) 1:23  
2:5,13,22,23 3:1,16  
4:6,21 5:1 49:17  
65:2,6 67:20  
process (27) 9:16  
17:16,17 22:1,1 30:20  
57:18 58:25 59:11  
61:22,24 62:3  
63:2,4,7,9 64:9,11,15  
70:2,3,5,9,9 71:8 78:2  
79:25  
producing (1) 18:3  
production (3)  
14:21,24,24  
pronounce (1) 31:16  
proper (5) 16:5 30:22  
45:7 57:16 79:22  
properly (6) 25:15,20  
38:8 74:16 76:12 80:6  
propose (3) 1:6 11:4,23  
proposed (3) 5:23 6:5  
82:13  
proposing (1) 57:23  
prosecution (8) 4:17  
6:8,12 8:11  
81:10,20,23 82:16  
prospect (1) 67:10  
protect (8) 13:20 15:23  
19:12 21:23 25:17  
75:14,15 76:5  
protection (6)  
13:15,17,18 18:18,19  
45:14  
provide (1) 35:8  
provided (9) 3:2 13:9,11  
18:25 36:10 45:6  
56:21 74:9,10  
providing (1) 48:2  
provision (3) 25:13 43:2  
63:18  
public (141) 5:3  
11:12,13  
12:8,18,23,25  
13:13,14,21 14:1,3,22  
15:6,23,24 16:24  
17:15 18:18,18,21  
19:12,16,19,23  
20:2,9,15,18  
21:6,18,20  
22:3,5,20,23  
23:9,13,15,19,24  
24:15,19  
25:2,14,16,22  
26:10,12 30:6 31:13  
32:3,13,21,21,22,23,23,24  
33:6,13 34:2,6,10  
35:13,19 38:18  
39:1,10,11

40:2,9,14,14 41:15  
42:3,24 43:2,19,25  
44:2,11,12 45:14,18  
46:1 47:2,2,8 48:20,22  
49:5,10 50:2,25 51:7  
52:1 53:24 54:3,19  
57:4,14  
59:13,18,21,25  
61:6,9,16,18,25  
62:1,25 63:19 64:13  
65:4,18  
66:1,10,16,22,23  
69:6,11,12,17,18  
71:17 75:4,7,16,21  
76:5,9,18 77:11,18,22  
78:5,7,11  
publicity (1) 47:7  
publicly (4) 35:22  
41:4,5 73:7  
pure (1) 34:4  
purity (1) 34:13  
purpose (5) 3:1 13:19  
14:12 19:11 34:5  
purposes (1) 41:12  
pursuant (1) 2:14  
puts (2) 31:9 62:18  
putting (4) 19:15 38:12  
50:2 75:16

Q

queens (5)  
7:1,1,3,14,18  
question (19) 12:17  
13:15 15:24 25:9  
30:7,20 31:7,10,13  
32:15 46:10 62:20  
64:7,8 69:10,14  
70:14,16 76:16  
questions (8) 11:9 14:5  
15:15 51:25 70:6,8,19  
81:2  
quite (7) 3:19 20:24  
27:3 37:12 38:8 64:21  
75:12  
quotation (4) 14:19  
16:11 26:15 46:8  
quoted (1) 77:2

R

radically (2) 54:24  
56:18  
raise (3) 54:12 76:16  
82:7  
raised (7) 4:24 53:6,8  
54:19 59:9 61:7 67:18  
ramifications (1) 43:4  
rare (3) 24:7 28:2,5  
rather (6) 5:12 52:3  
53:10 55:23 62:6  
82:17  
reach (4) 32:5 34:24  
71:5 77:8  
reached (2) 21:4 35:13  
reaches (1) 34:3  
reaching (1) 33:7  
read (12) 8:22 9:10  
26:1 37:24 40:25  
41:11 45:4,21 48:24  
49:23 58:19 79:6  
reading (2) 37:22 61:5  
real (17) 12:22 13:3  
14:10 15:16 16:19,24

17:5,13 18:9 20:3  
23:17,18 25:5,7 33:16  
55:5 71:18  
really (7) 24:5 32:8  
33:3,19 39:5 51:21  
67:13  
reason (11) 8:16 13:22  
17:1 19:9 20:5 29:9  
47:13,16,16 60:24  
72:14  
reasonable (2) 28:17  
66:2  
reasonably (1) 40:9  
reasoned (1) 17:4  
reasoning (1) 11:19  
reasons (5) 11:16 14:7  
18:10 21:13 22:8  
reassurance (2) 35:9  
51:22  
reassure (1) 58:1  
reassured (4) 39:20  
47:14 48:5,7  
receive (1) 21:15  
received (5) 9:3,9 43:15  
68:16 70:4  
receiving (1) 70:8  
recent (2) 66:24 71:11  
recognised (1) 47:1  
recognising (3) 28:9,9  
33:20  
recommend (1) 73:9  
recommendation (1)  
73:11  
recommendations (1)  
23:1  
reconsidered (2) 32:2  
59:24  
reconstituted (1) 75:7  
record (1) 40:25  
red (2) 12:14 28:15  
redaction (1) 64:6  
refer (8) 3:9 36:12  
40:15,22 44:19  
45:2,10,21  
reference (9) 4:24 11:6  
36:17 40:18 61:4,9,10  
63:14 81:25  
referred (5) 26:3,15,17  
40:15 50:8  
referring (1) 36:23  
reflect (1) 28:19  
reflection (1) 71:10  
refuse (1) 24:24  
refused (1) 32:1  
refusing (1) 14:24  
regard (4) 15:18 16:1  
17:24 64:24  
regarding (2) 54:9  
55:10  
regularly (1) 13:23  
reiterate (2) 58:20 75:1  
rejoinder (1) 9:23  
related (1) 47:21  
relates (2) 12:20 55:25  
relating (5) 40:8,13  
52:16 61:21 63:18  
relation (14) 12:5 27:23  
29:2 33:21 35:14  
51:25 69:23 71:1  
72:21 78:4,11,12 79:7  
81:6  
relative (3) 13:5

17:11,24  
relatively (2) 56:7,22  
relatives (2) 33:5 41:7  
relaxed (1) 62:24  
released (2) 15:24 23:15  
relevant (21) 12:17,20  
23:5 26:2 33:9,13,19  
35:20 40:24 46:8  
60:4,11 67:19 70:18  
71:24 72:10,13 73:1  
75:3,5 79:3  
rely (1) 57:1  
remain (1) 72:7  
remains (1) 65:20  
remanded (1) 2:25  
remind (2) 3:25 77:23  
reminded (2) 37:8 39:22  
reminding (2) 13:16  
40:6  
repeat (3) 11:4 54:11  
67:21  
report (6) 49:24 50:10  
78:15,15 82:8,9  
reported (4) 5:1 80:25  
81:2,7  
reporting (10) 1:7  
2:4,12 3:8 4:5,9  
5:5,23 53:20 81:22  
reports (5) 42:4 48:24  
49:5,23 53:19  
represent (7) 38:7,22  
40:19 41:11 48:13  
49:14 52:8  
representation (1) 3:2  
representations (2)  
5:21 6:2  
representative (2)  
81:19 82:15  
representatives (3) 8:14  
51:15 81:21  
represented (14) 6:25  
7:3,5,9,14,17,21  
8:2,4,7,8,10,12 9:13  
representing (2) 7:19  
59:7  
represents (1) 72:4  
request (1) 20:21  
require (5) 23:25  
25:12,12 47:15 75:14  
required (1) 77:11  
requirements (1) 64:10  
requires (1) 27:1  
requiring (4) 14:25  
40:20 41:4 70:7  
resolve (6) 70:15,21  
71:4,9,12 72:17  
respect (26) 16:15  
27:19 28:20  
29:2,5,15,23 44:14,23  
45:7 46:2 48:11 49:8  
52:10,13,18 54:8 57:8  
59:4,20 61:4 62:16  
66:11,23 67:14 68:20  
respectable (1) 53:20  
respected (1) 48:25  
respectfully (3) 40:6  
42:9 77:23  
respects (2) 70:20,24  
responded (1) 9:14  
response (4) 9:22 68:25  
70:5 76:14  
responsibility (5) 13:20  
16:7 28:25 31:18 80:2

responsible (3) 14:21  
45:6,13  
restraint (1) 51:15  
restrict (3) 42:23  
43:1,18  
restriction (1) 81:22  
result (7) 4:6 23:21  
26:7 34:24 56:24 74:1  
78:25  
revelation (3) 19:16  
25:22 75:17  
review (5) 9:4 11:3  
77:8,13,19  
reviewing (1) 76:1  
revisiting (1) 61:17  
rightly (1) 31:16  
rights (1) 63:15  
rigorous (3) 70:9 79:25  
80:8  
rimmer (1) 14:20  
riposte (1) 77:10  
rise (1) 36:4  
rises (1) 82:7  
risk (26) 2:4 4:5,20  
12:22 13:4 14:10  
15:16 16:17,19,24  
17:5,13 18:9 19:1,16  
20:3,4 22:7 23:17  
24:14 27:20 28:14  
29:14 56:17 71:18  
75:16  
risks (4) 18:23 21:25  
25:14,21  
rodney (1) 68:1  
role (2) 14:5 22:15  
room (2) 1:18 29:24  
root (1) 49:16  
rose (1) 7:16  
rosemary (1) 78:8  
round (2) 34:23 65:23  
roussos (1) 7:16  
route (2) 34:25 76:10  
rude (1) 67:17  
ruled (1) 4:24  
russian (3) 31:21,22  
61:21  
rutherford (1) 8:1

---

**S**

---

safe (1) 14:3  
safety (3) 14:22 45:14  
46:1  
saffie (1) 7:16  
salford (1) 8:8  
salman (1) 1:10  
salute (1) 69:24  
same (8) 10:1 15:3  
16:13 17:21 24:4  
34:24 76:19 78:10  
satisfy (1) 48:15  
saunders (71) 1:3,8  
5:14,17,20 6:3,7,10,13  
7:7 8:13,15,20 12:2  
14:16 20:17 21:7  
26:1,9 30:1 31:2,13  
32:25 33:5,10,25 34:9  
35:1,5,24  
36:7,18,20,25  
37:6,9,17,24 39:7,19  
43:6 46:5 49:21  
50:9,14 51:20  
55:12,20 58:1 59:8  
60:18 61:1 62:7,10

65:8,14 68:12,17  
73:18 74:18 76:22  
77:1 79:5,12 80:12,23  
81:12,14 82:5,14,20  
sautoy (1) 8:3  
save (6) 2:13 11:5  
16:17 38:5 46:10 68:3  
saying (13) 24:24  
30:3,11 31:17 32:17  
34:13 49:9 51:17  
55:13 62:10,16,23  
67:17  
scales (1) 22:11  
scenario (1) 34:7  
scene (1) 50:20  
schedule (1) 53:11  
scheduled (1) 1:21  
schedules (2) 9:18  
11:20  
scrutiny (2) 51:19 56:23  
second (20) 2:9,18  
10:13 25:1 29:3,8,9  
35:8 60:7,8,16 61:18  
64:23 68:24 70:11  
71:15,15 73:6,13  
75:10  
secondly (6) 10:20  
12:24 16:1 18:20  
69:20 70:16  
secret (3) 14:7 25:13  
78:12  
secretary (66) 4:19 6:24  
9:7,11,17,19,23  
10:1,19 11:21 12:7  
20:20 21:9,9 23:8 25:8  
29:18,20 38:17  
39:5,9,12,16,18,24  
40:12,17 41:9 42:11  
43:8,18 44:15,24  
46:11 51:14 52:11  
53:4 56:25 57:9,24  
62:16,22 64:23  
65:11,16,17  
66:1,14,19 67:4,5,10  
69:15 70:6,16,22  
71:11 72:1,5 73:8  
74:8,20 76:19  
77:5,16,22  
secrets (1) 15:9  
section (10) 2:15 3:6  
4:25 5:6 59:20 61:8  
63:15 65:7 75:6 77:12  
secured (1) 78:20  
security (85)  
13:14,15,16,18  
14:2,5,11 15:8,13,17  
16:8,17,20,22,25  
17:5,9,13,22  
18:2,10,16,23 19:4,6  
20:4 21:19,22,23  
22:4,7,14 23:23 24:14  
25:14,21  
27:4,6,14,21,25  
28:4,14,18 29:6,14  
30:5,10,11,15  
32:21,23 35:16 40:14  
42:6,16 43:8 44:12  
45:14 46:12,16,22  
47:6,17,20,23 48:23  
49:24 50:9 52:16  
53:3,22 54:9,18 55:6  
56:1,12,16,17 57:1  
64:20 71:19 74:14

76:11 81:25  
see (11) 14:18 25:18  
30:8,10 34:13,16  
49:17 56:15 58:5 61:8  
72:11  
seek (4) 13:20 19:12  
33:16 76:5  
seeking (1) 42:23  
seeks (1) 75:15  
seem (1) 55:15  
seems (5) 4:3 26:5,20  
27:2 38:18  
seen (6) 16:18 20:11  
23:1 38:7 42:2 51:22  
seized (1) 67:11  
selby (3) 6:11 8:12 81:9  
selfevident (1) 15:9  
selfevidently (1) 45:19  
sense (5) 5:10 34:18,22  
47:24 71:11  
sensible (2) 70:21,25  
sentence (1) 45:24  
separate (1) 61:18  
separation (4) 16:2,3  
52:10,25  
september (4) 1:1 9:25  
72:7 74:11  
sequence (1) 31:17  
serially (1) 65:23  
series (3) 9:5 53:20 78:7  
serious (11) 12:23 13:4  
14:10 15:12,16 16:24  
17:5 18:9 20:3 22:14  
71:18  
seriously (2) 2:6 14:1  
served (7)  
9:11,17,20,21,23 10:1  
42:2  
service (12) 4:17 6:8,12  
8:6,11 14:2 19:4 43:8  
81:10,20,23 82:16  
services (16) 27:5 30:10  
42:6,16 46:22  
48:1,2,23 53:3,22  
54:9,18 56:1,12 57:2  
81:25  
session (4) 40:11 42:22  
65:5 82:6  
set (14) 2:15 11:19  
18:10 19:22 30:4 51:8  
61:16 62:20,21  
66:1,16 68:6 70:4  
75:12  
setting (1) 63:23  
settled (1) 56:23  
seven (1) 40:25  
seventh (1) 3:1  
severe (3) 42:17,18 49:1  
severely (2) 41:11 43:3  
shall (3) 37:14 44:25  
81:12  
shape (1) 33:17  
share (2) 1:18 15:21  
shared (1) 18:24  
sheldon (1) 7:1  
shining (1) 50:22  
short (9) 4:15 10:11  
18:7 35:4 48:8 50:13  
74:24 80:23 81:17  
shortcomings (1) 49:2  
shortly (2) 74:3 75:20  
should (54) 1:16  
4:7,8,15 10:13,16 11:7

12:14 14:4,19 15:15  
16:7,15,22 17:7 20:9  
22:13 25:5,19 28:17  
29:1,13,22 31:7,25  
38:25 41:19 42:22  
46:23 47:13 48:4 51:3  
55:9 57:1 62:17,23  
67:13 68:7,8,24  
69:22,23 70:1,12  
71:12,19 72:24 73:7,9  
76:2,4,17 81:24,24  
shouldnt (2) 67:13  
80:25  
showing (1) 56:2  
shows (1) 63:12  
shut (1) 60:13  
siac (1) 27:8  
side (12) 17:9,10 21:19  
22:4,10,10 23:25,25  
27:25 28:1 34:2 38:12  
sight (1) 50:21  
significance (6) 16:3  
17:21 19:3 20:9,22  
76:9  
significant (6) 29:17  
35:18 40:21 43:4  
56:15 79:12  
significantly (1) 29:23  
similar (4) 14:17 26:18  
27:1 60:2  
simple (2) 56:20 72:13  
since (2) 70:3 72:5  
sir (184) 1:3,5,8,14  
3:7,19 4:3,7,12  
5:4,10,13,14,16,17,19,20  
6:1,3,7,9,10,13,19,20,25  
7:7,8 8:13,15,19,20  
9:2,9 10:3,13,16,25  
11:6,13,23  
12:2,2,3,4,4,13,15  
14:16,17 17:9 18:6  
19:18 20:17,25,25  
21:7,8 25:23 26:1,8,9  
27:16 30:1,16  
31:2,4,13 32:22,25  
33:1,5,8,10,12,25  
34:2,9,10  
35:1,4,5,7,24  
36:4,7,12,18,20,25  
37:4,6,8,9,17,20,24  
39:5,7,19,21 40:4,15  
41:8,18,20 42:1,8,19  
43:6,13 44:13 45:22  
46:5,6,9 47:1,14 48:24  
49:2,13,21 50:7,9,14  
51:20 52:9 55:12,20  
58:1 59:8 60:18,19,25  
61:1 62:7,10 65:8,14  
68:12,17,23  
69:2,18,20 70:1,10,11  
71:5,22 72:18  
73:4,13,18,23  
74:2,15,18,18,21,22,22  
76:22,23 77:1,3  
79:5,11,12  
80:10,12,21,23  
81:8,12,14,19  
82:5,14,19,20 83:7,17  
sit (2) 37:14 79:5  
situation (2) 29:11  
40:10  
six (1) 40:24  
sixth (1) 2:24

skeleton (4) 14:12 15:2  
16:10 34:15  
slater (2) 7:15 9:13  
slightly (5) 12:5 16:12  
33:12 34:17 43:6  
slow (2) 55:3,9  
small (1) 54:8  
smg (1) 8:9  
social (2) 3:9 4:9  
solicitors (3) 2:21 7:22  
8:5  
someone (2) 28:14  
80:18  
something (6) 8:20  
15:12 32:17 34:1  
56:14 63:1  
somewhat (4) 33:25  
44:24 58:1 65:9  
somewhere (2) 58:19  
63:6  
soon (2) 8:17 82:6  
sophie (1) 6:21  
sorrell (1) 7:20  
sort (2) 19:16 28:15  
sorts (1) 28:20  
sought (3) 21:10 42:5  
53:12  
source (2) 53:19 54:16  
speak (2) 5:24 36:2  
speaking (1) 54:15  
specific (3) 11:6 51:24  
79:23  
specifically (3) 22:21  
80:14 81:6  
spoken (2) 81:19,20  
stage (15) 4:14 21:3  
23:14 25:1 27:18  
29:3,8,9,10 32:6 60:17  
72:10,15 73:3,21  
stages (3) 27:16,18  
34:24  
stands (2) 74:12 77:3  
start (3) 1:21 13:14  
50:20  
starting (3) 38:14 51:3  
62:14  
stated (1) 14:21  
statement (3) 15:4  
26:18 77:4  
statements (3) 14:17  
26:3 53:22  
states (9) 21:9 39:9,24  
41:9 46:11 51:14  
56:25 71:11 74:20  
statutory (8) 2:10 22:20  
64:9 67:1 70:17 71:22  
72:9 73:10  
steps (2) 4:4 18:2  
still (8) 15:3  
29:16,17,22 31:6  
43:19 79:15 82:12  
stop (1) 55:12  
stress (2) 54:13 56:11  
strictly (3) 71:3,8 72:25  
stripping (1) 34:5  
strips (1) 20:15  
strong (3) 11:11 13:1  
69:16  
structure (1) 13:7  
structured (1) 73:25  
subject (3) 17:7 35:12  
74:6  
subjects (1) 56:3

submit (30) 4:7 10:13  
16:21 19:19 23:4  
24:11 38:15 39:23  
40:1,19,24 42:9,14,22  
43:25 44:19,19 45:3,3  
46:4,13,16,18 47:10  
48:2,18 55:9 70:12,21  
72:14  
submits (1) 44:17  
submitted (5) 39:2  
41:18 46:20 53:23  
71:13  
subsidiary (2) 42:13  
47:3  
substantial (4) 2:4 4:20  
5:1 20:7  
substantive (2) 36:14  
43:24  
succinctly (1) 39:5  
sufficient (5) 13:3 32:9  
58:24 71:7 81:13  
sufficiently (1) 64:14  
suggest (2) 10:16 23:20  
suggested (2) 12:1  
73:17  
suggesting (1) 23:20  
suite (1) 64:6  
summary (3) 2:20 18:3  
64:5  
supplemental (1) 8:23  
supplementary (3)  
37:22 38:1,12  
supplemented (1) 9:18  
suppose (1) 30:6  
sure (4) 3:19 8:15 30:16  
80:12  
surmounted (1) 16:23  
surrounding (2) 19:3  
40:3  
suspects (1) 80:1  
suspension (1) 41:16  
sway (1) 41:10  
sweeney (2) 2:11 3:17  
systematic (1) 54:17  
systems (4) 54:17,23,23  
55:4

---

**T**

---

tab (9) 14:15  
37:4,6,8,19,25 38:13  
53:7,7  
tacitly (2) 44:16 47:25  
taken (13) 4:4 15:12  
23:16 25:24 35:23  
39:17 43:12 45:20  
48:6 62:17 67:14  
77:17 79:18  
takes (3) 25:11 59:5,25  
taking (4) 24:10 38:16  
65:22 81:4  
talk (1) 32:20  
talking (2) 28:15,16  
team (1) 70:7  
ten (3) 53:15 58:21  
81:13  
tendered (1) 48:17  
tenor (1) 43:14  
terms (23) 5:12 7:9 8:6  
12:15 16:13 18:17  
26:18 32:20 35:6  
51:6,10,15 52:15,19  
53:1,5 56:16 57:3 68:5  
72:14 73:8 75:1,23

terrible (1) 49:19  
territory (1) 30:23  
terrorism (1) 2:10  
terrorist (1) 45:15  
terrorists (1) 75:18  
terry (1) 7:21  
test (5) 4:25 13:4 24:5  
28:6 67:19  
tested (2) 11:22 78:24  
tests (2) 31:12 75:11  
thank (41) 1:8 5:14,20  
6:3,13,17 7:7,8  
8:13,25 9:2 12:2,12,13  
14:16 30:1 35:1,5,24  
36:7,9,21 37:6,7,24,25  
46:9 50:11,14,14,18  
55:17 61:2 62:13  
68:12 80:20,21,22  
82:5,19,20  
thats (23) 12:12  
17:9,25 25:3,23 28:15  
29:7 32:6,17 33:1,10  
37:11 46:13,15 50:9  
55:17 57:3,8 61:4  
63:14 66:17 76:14  
77:14  
themselves (2) 56:14  
57:2  
theoretical (2) 25:25  
38:21  
theory (6) 23:22,24  
24:1,25 25:1 30:17  
thereafter (1) 9:14  
therefore (22) 1:21  
10:3,25 18:18 23:4  
28:10 29:13,24 52:23  
53:23 55:3 56:6,20  
63:4 64:25 65:4 66:9  
67:9,12 69:5 70:11,25  
theyre (2) 26:7 54:2  
thing (7) 19:11,14  
28:15 29:8 34:22 45:4  
81:1  
thinking (1) 34:15  
third (6) 2:19 35:17  
64:7 65:15 74:2 78:18  
thirdly (6) 3:19  
10:14,20 19:2 70:1  
75:19  
thomas (4) 11:9 13:10  
69:9 70:19  
thorough (1) 35:21  
thoroughly (1) 75:2  
thought (5) 19:8 22:9  
78:17,19,25  
threaten (1) 1:16  
three (10) 18:7 19:18  
35:4 60:7 69:6 74:24  
78:3,4,5,9  
through (5) 18:5 19:16  
49:5 53:3 56:20  
time (13) 6:14,19 50:13  
58:5,11,16 59:3,5  
65:19 67:10 76:19  
78:10 80:23  
timelimited (1) 5:8  
times (1) 65:10  
timetable (2) 10:6  
73:22  
today (22) 3:14,15,21  
4:13 7:19,23 8:7 9:8  
10:11 11:5 36:10  
39:2,15,24 51:12

57:5,9 60:17 63:10  
 66:12 71:13,23  
**together (1)** 6:21  
**tone (2)** 39:14,23  
**too (3)** 49:11 54:4 59:4  
**took (2)** 2:11 61:24  
**tools (1)** 49:6  
**topic (9)** 10:18,23  
 60:7,8,9,14 68:24  
 70:11 73:14  
**topics (2)** 10:17 60:7  
**totally (1)** 25:4  
**touch (1)** 13:12  
**touchstone (1)** 41:20  
**towards (2)** 38:18 82:12  
**town (1)** 19:20  
**tragedy (3)** 44:7 46:19  
 49:20  
**tragic (3)** 38:24 40:3  
 41:21  
**tranche (1)** 62:1  
**transcribed (1)** 55:14  
**transparency (1)** 41:24  
**tree (1)** 18:17  
**trial (6)** 1:17,20,24 3:24  
 70:23 82:11  
**tribunal (4)** 13:2 19:24  
 25:11 41:6  
**tried (3)** 1:11 53:17  
 67:9  
**trite (1)** 77:15  
**tron (1)** 7:21  
**true (2)** 13:5 28:10  
**truly (1)** 24:10  
**trump (1)** 52:21  
**trumps (1)** 20:4  
**truth (2)** 23:11 24:22  
**try (2)** 50:19 82:17  
**trying (4)** 18:1 26:20  
 60:13 82:18  
**turn (4)** 10:17 36:22  
 37:9 68:23  
**turning (1)** 70:11  
**turns (1)** 80:6  
**tweddle (1)** 7:25  
**twitter (1)** 4:9  
**types (1)** 33:21

**U**

**ultimate (1)** 29:10  
**ultimately (5)** 28:7 29:3  
 31:6 34:3 71:13  
**unavailable (1)** 23:3  
**uncertain (1)** 65:10  
**unconvinced (1)** 72:8  
**underplay (1)** 40:1  
**understand (14)** 1:20  
 5:11 13:8 18:24 31:17  
 32:4,14 34:9 57:23  
 58:17 59:8 67:25 69:3  
 70:1  
**understandably (2)** 74:5  
 81:23  
**understanding (3)**  
 49:18,19 61:12  
**undervalued (1)** 44:25  
**undisclosed (1)** 56:6  
**undoubted (1)** 19:2  
**undoubtedly (3)** 19:11  
 66:17 71:3  
**unfortunate (1)** 46:14  
**unfortunately (1)** 47:4  
**unique (2)** 20:19 21:3

**university (1)** 8:8  
**unjustified (1)** 41:16  
**unlawfully (1)** 45:16  
**unless (5)** 23:12 45:16  
 47:12 66:5 80:14  
**unlikely (1)** 55:5  
**unnecessarily (1)** 21:12  
**unnecessary (3)** 23:18  
 72:16,25  
**unpersuaded (1)** 72:7  
**unquestioning (1)** 46:3  
**unsurprising (3)** 14:3,8  
 19:8  
**until (6)** 4:10 5:23  
 23:13,15 24:19 66:5  
**unusual (2)** 21:3 46:25  
**upheld (5)** 22:13 64:7  
 71:7 72:24 79:8  
**uphold (2)** 31:20 65:1  
**upholding (1)** 68:9  
**upon (3)** 4:24 42:2 82:9  
**urge (4)** 51:4,18 55:3  
 56:23  
**urging (1)** 51:15  
**used (3)** 46:15 68:9  
 79:25  
**utmost (2)** 2:8 46:2

**V**

**v (1)** 14:20  
**value (4)** 9:15 13:25  
 75:18,21  
**variety (1)** 55:7  
**viable (1)** 21:20  
**victims (1)** 1:12  
**views (4)** 45:6 46:1 53:3  
 57:1  
**virtually (2)** 16:20 44:17  
**voice (1)** 55:23  
**volume (1)** 37:9

**W**

**wants (5)** 5:22 35:8  
 80:14,18,20  
**wasnt (5)** 56:9 61:7,14  
 63:16,16  
**wave (1)** 26:25  
**waving (6)** 26:17 27:15  
 31:3,4,5 46:7  
**way (27)** 21:21 22:18,22  
 27:2 29:18 31:12 32:9  
 34:17,19,19,20 37:12  
 44:13 50:21 51:2 54:2  
 62:14,20 64:5,20  
 65:25 67:22 70:3  
 72:20 74:1 76:14 82:3  
**ways (1)** 18:22  
**weatherby (33)**  
 7:17,19,22  
 50:16,17,18 51:21  
 52:7 55:13,19,22  
 58:20 59:9  
 60:5,13,20,23 61:3  
 62:9,10,13 65:8,13,15  
 68:13 70:14 71:13  
 72:3 73:6 77:25 80:22  
 82:3 83:13  
**weatherbys (1)** 81:2  
**webster (1)** 8:5  
**weigh (2)** 12:21 29:4  
**weighed (1)** 29:13  
**weighing (1)** 71:17

**weight (7)** 17:21 24:1  
 27:19 30:12 33:16  
 35:18 71:19  
**wendy (1)** 7:10  
**went (2)** 78:5 81:1  
**west (1)** 8:6  
**whatever (5)** 22:6 23:12  
 40:10 48:3 80:9  
**whats (2)** 8:16 27:3  
**whilst (2)** 33:20 44:16  
**whip (5)** 19:7  
 46:12,16,23 49:9  
**white (9)** 26:17 27:1,15  
 31:3,4,5,9,9 46:7  
**whole (6)** 15:7 24:21  
 45:4,22 53:20 55:7  
**wholly (3)** 17:14 67:8  
 77:25  
**whose (1)** 14:6  
**wide (2)** 51:18 54:4  
**widely (1)** 3:7  
**wider (1)** 49:19  
**wilcox (1)** 7:21  
**wiley (5)** 15:4 60:12  
 70:18 71:16 72:20  
**williams (1)** 8:10  
**willingness (2)** 23:8  
 24:13  
**wish (9)** 6:4 10:18  
 35:17 36:1 73:14  
 75:10,19 76:14 80:16  
**wishes (3)** 10:22 11:25  
 60:14  
**wont (2)** 80:12 82:19  
**work (6)** 14:2,6 26:20  
 29:22 35:10 58:22  
**works (2)** 24:8 27:2  
**world (1)** 21:24  
**worried (1)** 52:6  
**worth (2)** 62:8,12  
**wouldnt (4)** 32:9 34:21  
 77:1 82:14  
**write (1)** 27:8  
**writing (8)** 8:22 9:14  
 54:12 56:21 57:8,10  
 61:10 72:1  
**written (3)** 20:11 36:14  
 53:6  
**wrong (4)** 37:6 40:1  
 44:19 64:25  
**wrongdoing (1)** 41:16

**Y**

**year (3)** 36:18,19 37:23  
**yesterday (1)** 76:21  
**yours (2)** 31:6,10  
**yourself (1)** 9:9  
**youve (1)** 68:18

**I**

**1 (1)** 83:3  
**10 (3)** 45:3 81:12 83:5  
**1000 (1)** 1:2  
**10000 (2)** 53:15 58:21  
**11 (3)** 1:21 14:18 63:18  
**12 (3)** 9:12,19 83:7  
**1200 (1)** 81:16  
**1210 (1)** 81:18  
**1215 (1)** 82:21  
**13 (2)** 36:20 53:7  
**14 (1)** 53:7  
**15 (4)** 37:4,8,19 38:13

**16 (2)** 9:20 37:25  
**19 (7)** 36:15,17 53:6  
 59:20 65:7 75:6 77:12  
**1981 (1)** 1:24

**2**

**2 (6)** 59:15 60:1 66:25  
 71:7 75:25 79:10  
**2005 (1)** 79:2  
**2009 (1)** 63:16  
**2019 (2)** 1:1 36:15  
**21 (1)** 14:15  
**22 (4)** 1:12 2:11 3:6  
 37:22  
**23 (1)** 53:7  
**24 (1)** 76:24  
**25 (1)** 61:11  
**25a (1)** 14:19  
**25b (1)** 14:13  
**27 (1)** 16:10  
**29 (5)** 3:12 9:5 11:4,11  
 70:3

**3**

**3 (1)** 73:20  
**30 (2)** 9:22 15:3  
**31 (1)** 41:1  
**35 (1)** 83:9  
**36 (1)** 83:11

**4**

**4 (3)** 9:25 72:7 74:11  
**42 (3)** 2:15 4:25 5:6  
**44 (1)** 45:12  
**46 (1)** 45:23

**5**

**5 (1)** 63:15  
**50 (1)** 83:13  
**510 (1)** 44:20  
**53 (7)** 36:16,23 37:2,3  
 39:6 40:4,22  
**54 (1)** 41:18  
**55 (2)** 39:6 40:4

**6**

**6 (1)** 1:1  
**65 (5)** 61:5,12 62:11  
 72:11 77:15  
**68 (1)** 83:15

**7**

**74 (1)** 83:17