

1 THE INQUIRY RESUMED ON THURSDAY, 19TH MARCH 2026, AS
2 FOLLOWS:

3
4 CHAIRPERSON: Good morning, Mr. Greaney.

10:30

5
6
7 SUBMISSION BY MR. GREANEY:

8
9 MR. GREANEY: Good morning, sir. Before we begin the
10 hearing today there are two preliminary matters to
11 raise. First of all, can we remind everyone that a
12 Restriction Order is in place for this hearing. The
13 effect of that order is that there is a ten minute
14 delay on YouTube broadcast and in relation to those
15 present in this building, whether in this hearing room
16 or in the remote viewing space and in relation to those
17 in the hearing room in Omagh where there is no delay,
18 there can be no publication of anything said in the
19 course of the hearing until the delayed YouTube feed
20 has been broadcast or the transcript published.

10:30

10:31

10:31

21
22 The second preliminary observation is to note, sir,
23 that this is the first hearing at the Inquiry's new
24 permanent home here at Bradford Court in Belfast. The
25 space here has been organised to reflect the
26 requirements of your Inquiry, sir. Within this
27 building there is a dedicated space for bereaved
28 families and survivors as well as space for the Press
29 and an overflow and a viewing space for those who do

10:31

1 not wish to be in the main hearing room and,
2 importantly, there is a designated space for WAVE, who
3 will be available should anyone wish to speak to them
4 today or on any day that the Inquiry sits.

5 Sir, that said, this procedural hearing today will deal 10:32
6 with two broad topics. The first topic will involve
7 the Inquiry Legal Team providing an update to Core
8 Participants and the public on the progress of the
9 Inquiry. So, can we add that this is the topic upon
10 which we consider submissions from the Core 10:32
11 Participants will not be required once we have finished
12 our address.

13
14 The second topic for today will involve consideration
15 of applications for anonymity of witnesses that have 10:32
16 been made on a sample basis by PSNI and HMG.
17 Submissions on those applications will be needed from
18 those Core Participants who have lodged written
19 submissions.

20 10:33
21 Sir, the order we propose for those oral submissions on
22 anonymity is as follows; first, we will make, when we
23 reach that stage, submissions on the general principles
24 and we will introduce, although only very briefly, the
25 individual applications that have been made by the 10:33
26 police and by his Majesty's government.

27
28 Second, once we have done that we will hear from those
29 who make the applications, so that is to say we will

1 hear from PSNI and then we will hear from HMG and so we
2 expect that we will hear from them on both the
3 principles that you should apply in dealing with these
4 applications and that you should hear from them also on
5 the applications to the extent that they can do so in 10:33
6 open today.

7
8 Thirdly, after that we will hear from the bereaved
9 family and survivor Core Participants on those same
10 topics. 10:34

11
12 Sir, as everyone appreciates there is necessarily an
13 open and a closed portion of the applications and the
14 open part only will be dealt with today and so can I,
15 before we go any further, that it appears to me that 10:34
16 all of the microphones within the room are switched on
17 and so when people understandably are opening their
18 papers or folding pieces of paper, that is being
19 broadcast over the speaker system. So, if something
20 can be done about that certainly I would appreciate 10:34
21 that.

22 CHAIRPERSON: Are the microphones individually
23 switched?

24 MR. GREANEY: well, I would have thought that we can
25 deactivate the microphones, save for your microphone or 10:34
26 the microphone of the speaker. Sir, I don't know about
27 you but certainly I will find it distracting. So,
28 Mr. Suter has left in order to try and deal with it.
29 In the meantime I will carry on because time is

1 precious today. Thank you, Mr. Suter.

2
3 So, sir, as I indicated the first topic that we'll deal
4 with today and I anticipate that this will take us to a
5 break at which we will take lunch, is an update by the 10:35
6 Inquiry Legal Team on progress to date.

7 So that first topic, the update has five parts. First
8 of all we'll give some further information on Chapter
9 3, much of which will already be known to Core
10 Participants but will be unknown to the wider public 10:35
11 and it will be convenient at the end of that update
12 also to deal with the issue of scope which had formed a
13 separate item on the agenda for today but which has
14 resolved for now a contentious issue and so our
15 observations on scope will be short. 10:36

16
17 Second, we'll provide an update on the position in
18 relation to the AGS and the government of Ireland.

19
20 Third, we'll deal with the current position on 10:36
21 disclosure and on Inquiry request for witness
22 statements and at that stage, sir, it will be necessary
23 for us to record publicly areas in which real focus
24 needs to be brought to bear by our material providers
25 as otherwise the progress of the Inquiry will be put at 10:36
26 risk.

27
28 Fourth, we'll address the progress of the Closed
29 Material Restriction Order process, in other words the

1 CMRO process and again it will be necessary for us to
2 record publicly areas which the Inquiry Legal Team
3 consider need urgent attention by some of those engaged
4 in the process so as to enable the Inquiry to maintain
5 its momentum which otherwise may be lost or affected. 10:37

6
7 And then fifth and finally, in relation to the first
8 topic, we will set out the position in relation to the
9 Inquiry's closed facilities. The access to and use of
10 these facilities bears directly on the ability of the 10:37
11 Inquiry Legal Team to ensure any closed part of your
12 investigation is moved forward in a timely and
13 comprehensive manner.

14
15 Everyone involved in this process knows that there will 10:37
16 have to be closed hearings and to prepare for those
17 closed hearings the Inquiry needs closed facilities at
18 which it can receive and review closed materials. And,
19 sir, that much seems to us to be and has always been
20 beyond obvious for your Inquiry. 10:37

21
22 So, the topics. Topic one, Chapter 3 and the issue of
23 scope.

24
25 Sir, there were always going to be some teething 10:38
26 difficulties given we have moved into the new building,
27 I am told when the YouTube feed was started today the
28 delay was not applied. It is now being applied so we
29 need to break for 10 minutes in order to catch up. You

1 have my apologies, sir, for that but would you rise for
2 that short period please?

3 CHAIRPERSON: Yes, all right.
4

5 THE HEARING RESUMED AFTER A SHORT ADJOURNMENT AS
6 FOLLOWS:

10:39

7
8 CHAIRPERSON: Mr. Greaney.

9 MR. GREANEY: Sir, thank you very much. As you'll
10 recall I was dealing with the first of the five topics
11 upon which we are updating Core Participants and the
12 public at large. The first of those topics is Chapter
13 3 and the scope issue. As all in this room and indeed
14 beyond will know, this time last year you directed,
15 sir, that the Chapter 3 oral evidence hearings would
16 commence on the 9th of March 2026. The effect of that
17 direction, had it been possible to maintain, would have
18 been that both last week and this week the Inquiry
19 would have been hearing evidence about the bombing of
20 Omagh with a view to establishing, so far as possible,
21 how the attack was carried out and by whom and those,
22 of course, are the principle purposes of Chapter 3.

10:53

10:53

10:53

23
24 As all in this room also know at the end of last year
25 you, sir, directed that the date of the 9th of March be
26 vacated. This was for a number of reasons including
27 the state of disclosure of material from the Republic
28 of Ireland, to which we'll turn, and the judicial
29 review to your Special Advocates ruling which was

10:54

1 heard, as it happens by Mr Justice McALinden last
2 Monday to Thursday and in respect of which judgment is
3 understandably reserved.
4

5 On the 6th of March of this year Core Participants were 10:54
6 informed of the new commencement date for Chapter 3 but
7 today is the first public revelation of that date.
8 Sir, the oral evidence hearings for Chapter 3 will
9 commence on the 21st of September 2026 with an
10 anticipated duration of approximately four weeks. 10:54
11

12 Before moving on to other Chapter 3 related matters I
13 should say something about both parts of that last
14 sentence. As to the first part of that sentence,
15 namely the choice of the 21st of September, that at the 10:55
16 risk of stating the obvious is a date in six months'
17 time. The Inquiry legal team is acutely aware of how
18 disappointing this would be for many people. We
19 understand that reaction, sir, and moreover we
20 sympathise with it because we are disappointed too. 10:55
21 However, we know that most, if not all will understand
22 the importance of your Inquiry not being rushed and
23 being as comprehensive as it can be in addressing the
24 Terms of Reference.
25

26 The reality, sir, is that you are under a statutory
27 duty to conduct a full and fearless investigation and
28 to discharge your Terms of Reference and we know that
29 do so is your determination. Achieving that made a

1 postponement of Chapter 3 unavoidable.

2
3 As has already been communicated to Core Participants,
4 the date of the 21st of September of this year has been
5 selected to ensure that Chapter 3 achieves what it 10:56
6 needs to achieve. As we've said one of the reasons,
7 but we stress not the only reason for adjourning the
8 9th of March date, was due to material originating from
9 the Republic of Ireland not being available. The
10 volume of that material must not be underestimated nor 10:56
11 should its potential bearing on Chapter 3 and the
12 Inquiry's wider work.

13
14 As we will come to in the next part of this update, the
15 volume of that material means that although disclosure 10:56
16 to and by the Inquiry will be on a rolling basis it
17 will not all have been disclosed to the Inquiry until
18 June of this year. Once disclosed to the Inquiry it
19 must be reviewed for relevance by our team and
20 redactions considered and checked because that's our 10:57
21 process and, furthermore, once that material from the
22 government of Ireland is in the hands of Core
23 Participants they, of course, need time to consider it
24 and that's their process. In those circumstances we
25 hope it will be obvious that a date earlier than 10:57
26 September to start Chapter 3 is simply not feasible.

27
28 Furthermore, the first two weeks in September, as has
29 we all know has been allocated to the resolution of the

1 Sample Closed Restriction Order applications and so
2 I'll say more about the CMRO process in the fourth part
3 of this update. Such a resolution, a resolution of the
4 sample CMRO applications, need to take place as soon as
5 possible so as to permit the open, closed divide be 10:58
6 established and work on preparation for later chapters
7 to be progressed. Sir, it was in those circumstances
8 that you have identified the 21st of September 2026 as
9 the earliest possible start date. And we, for our
10 part, entirely agree with your assessment. 10:58

11
12 As for the second part of that sentence, the duration
13 of Chapter 3, the Inquiry will sit on four days each
14 week from the 21st of September until the Chapter 3
15 evidence has been heard. The evidence for the Chapter 10:58
16 3 hearing, as I set out a short time ago, is four
17 weeks. That estimate reflects the Chapter 3 is about
18 understanding what has been established about the
19 methodology of the bombing and the people responsible
20 for the attack. Some of this understanding arises from 10:58
21 the Breslin litigation and, as such, the Inquiry can
22 use those proceedings as a starting point for what has
23 already been established but it's just that, a starting
24 point.

25 10:59
26 During Chapter 3 it will be important for the Inquiry
27 Legal Team and Core Participants, we suggest, to
28 maintain the focus on the objective for Chapter 3
29 rather than moving ahead or seeking to move ahead into

1 issues which bear directly on whether the bombing could
2 have been prevented. Sir, that need for focus is for
3 two reasons. First of all because Chapter 3 will form
4 the bedrock of what will follow. As has been pointed
5 out on many occasions in the past it's only by 10:59
6 understanding who was responsible for the Omagh bombing
7 and how they did it that it will be possible to
8 identify which of the previous incidents referenced in
9 the provisional list of issues were the responsibility
10 of the same people or the same group or groups. In 11:00
11 turn, it will only be then that focus, it will be once
12 that focus has been identified that focus can shift to
13 considering whether those people might have been
14 detected, deterred or disrupted before they attacked
15 Omagh. 11:00

16
17 The second reason to maintain the focus in the way that
18 we have described is because disclosure for Chapter 4
19 will not have been completed by the time we reach
20 September 2026 and start Chapter 3. As has previously 11:00
21 been made clear it will be in Chapter 4 that overt
22 investigative techniques and material in relation to
23 the previous incidents will be examined. As such, both
24 the Inquiry Legal Team and Core Participants will not
25 be across all the evidence which is relevant to the 11:01
26 subsequent chapters when we start Chapter 3. And such
27 circumstances are, in our estimation, only likely to
28 lead to confusion, duplication and a lack of clarity if
29 that, which should properly be confined to Chapter 4,

1 is started upon in Chapter 3. So, at the risk of
2 repetition, the purpose of and the focus of Chapter 3
3 will need to be kept well in mind during that phase,
4 Chapter 3, of your investigation.

5 For all of these reasons, as has been explained in the 11:01
6 past, a huge volume of factual evidence relevant to the
7 bombing itself will be reduced to summary form. Core
8 Participants will have the opportunity to comment on
9 those summaries to ensure that relevant evidence has
10 not been overlooked. We anticipate that the first of 11:02
11 those summaries will be made available to Core
12 Participants at the end of April. And the Inquiry
13 Legal Team is working to ensure that Core Participants
14 have access to all evidence which is referenced in
15 those first drafts. However, as the understanding of 11:02
16 the material from the AGS develops, it may be necessary
17 to revisit those summaries.

18
19 There are two further matters that, sir, we should
20 address in relation to Chapter 3 before coming to, as 11:02
21 we promised we would, the scope issue. In relation to
22 experts, Core Participant engagement with the reports
23 of the experts whose evidence bears upon Chapter 3 has
24 been working well from the Inquiry Legal Team's point
25 of view. The team of forensic scientists, led by 11:02
26 Professor Gallop, is in the process of finalising the
27 first draft of their Chapter 3 report with a view to
28 that being shared with Core Participants for their
29 comments.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

The cell site expert, Dr. Matthew Tart, has completed his Chapter 3 report and relevant comments from Core Participants are in the process of being fed back to him by the Inquiry Legal Team and, sir, we are content with progress in all of those respects. 11:03

We have previously emphasised the need for the core evidence relating to Chapter 3 to be digested into what we've termed and what has been termed in other processes an electronic presentation of evidence or an EPE. That presentation, once completed, will draw together many strands into a coherent whole. 11:03

In relation to the EPE for Chapter 3, as Core Participants are aware, the Inquiry has engaged the services of experts in this field to create a presentation which brings together all of the material from PSNI, from the Republic of Ireland and from the Ministry of Defence together with other material that the Inquiry Legal Team has identified as being relevant and in particular, in that regard, evidence of cell site analysis. So all of those strands are in the process of being drawn together into a coherent whole. 11:04

Sir, Core Participants will have access to this presentation in advance of the Chapter 3 hearing. While its creation is still under way and it will not be possible to finalise it until the review of all the AGS material has been completed, it is intention of the 11:04

1 Inquiry Legal Team to bring a draft of part of that
2 presentation to Omagh and to play it to the family Core
3 Participants who wish to see it in advance of the 21st
4 of September 2026. And the date for that viewing of
5 the draft has yet to be set but our estimation is that 11:05
6 it is likely to be at some time in April, so well ahead
7 of September start date for Chapter 3.

8
9 We turn finally, in this first part of the update, to
10 the issue of scope. This issue, which I'll say a 11:05
11 little more about in a moment, applies across the
12 Inquiry's chapters but we mention it in connection with
13 Chapter 3 because it arose as a potential issue during
14 the preparation for that chapter. The scope issue, as
15 we've described it, simply put is whether or not it is 11:05
16 within the Inquiry's Terms of Reference for you, sir,
17 to investigate anything which touches upon the issue of
18 the evacuation of members of the public in Omagh in
19 response to the so-called warning calls on the 15th of
20 August 1998. It will not be possible, within a short 11:06
21 time today, to do justice to the nuance and complexity
22 of the matters which have been raised. The starting
23 point is that the latest version of the provisional
24 list of issues, which of course is on the Inquiry's
25 website, sets out the approach of the Inquiry Legal 11:06
26 Team to this issue. However, may we say constructively
27 and responsibly, the Fox Law Group of Core Participants
28 have made observations around that approach I have just
29 described. In turn, that has led to all Core

1 Participants having the opportunity to consider and
2 reflect on the approach of the Inquiry Legal Team and
3 the matters raised by Fox Law in relation to scope.
4

5 The Inquiry Legal Team's position was and moreover is, 11:06
6 that to the extent it needs to be resolved, the scope
7 issue resolution should occur by reference to the
8 evidence rather than on a theoretical or hypothetical
9 basis. As such, the Inquiry Legal Team's position was
10 and remains that no ruling was required from you on 11:07
11 scope at this stage. However, there was a suggestion
12 within some subsequent responses from Core Participants
13 that the matter needed ventilation and resolution
14 sooner rather than later. In light of that item two of
15 the original agenda for this hearing today had been 11:07
16 submissions on this point. Namely whether or not
17 directions needed to be given to drive towards an early
18 hearing resolving this issue where required. However,
19 and for this we are for our part extremely grateful for
20 the communication which has taken place between Fox Law 11:08
21 and PSNI, all are now agreed, as we understand it, that
22 submissions at this stage on scope, ahead of Chapter 3,
23 are not required. And on that basis directions are not
24 required.

25 11:08
26 Sir, as a result this issue of scope, to the extent
27 that it needs to be raised again, will await the
28 evidential circumstances in which it may arise in
29 relation to any other subsequent chapter of the

1 Inquiry's oral evidence hearings. And so, sir, this
2 isn't about pushing an issue down the road, it is about
3 identifying the right point in time to resolve the
4 issue if resolution is required.

5 Can we make plain before we move to issue two, and make 11:08
6 plain, sir, there is no misunderstanding, that none of
7 the individual officers who were responsible for the
8 evacuation on the 15th of August 1998 will be called
9 during Chapter 3. To the extent necessary their
10 evidence will be summarised during that chapter. 11:09

11
12 Sir, the second item upon which we are today providing
13 an update relates to the AGS material and the
14 government of Ireland. We've touched already on some
15 of what we are about to say but this is an important 11:09
16 area of work for the Inquiry in which we recognise
17 there is much public interest. A fuller picture than
18 already provided requires to be set out for those
19 reasons.

20 11:09
21 Two key events provide the context for the update
22 today. The first of those the signing of the
23 Memorandum of Understanding between the Inquiry and the
24 Irish government. That occurred on the 15th of April
25 2025. The Memorandum of Understanding itself was 11:10
26 published on the Inquiry website the same day. The
27 Memorandum of Understanding provides the framework
28 within which the government of Ireland will disclose
29 material to the Inquiry which, of course, is the start

1 of the process by which ultimately disclosure is made
2 to the Core Participants.

3
4 The second key event was the decision that you, sir,
5 took to vacate the hearing on the 9th of March due, but 11:10
6 only in part as we have already said, to the fact that
7 you concluded that the material expected from the AGS
8 would not be disclosed to the Inquiry processed and or
9 provided to Core Participants in time for that start
10 date. 11:10

11
12 As all Core Participants now know, the Inquiry has now
13 received a very significant quantity of AGS material
14 from the government of Ireland. This material was
15 prioritised at the Inquiry's request by reference to 11:11
16 schedules which had been provided by the government of
17 Ireland. In excess of 20,000 pages have been disclosed
18 to the Inquiry already by the government of Ireland and
19 some of that material has already been processed by the
20 Inquiry and was disclosed to Core Participants last 11:11
21 week. The mechanics of this disclosure exercise have
22 been the subject of extensive discussion with the
23 government of Ireland in a series of face-to-face
24 meetings. While we are at an early stage of the
25 disclosure process, the Inquiry Legal Team has been 11:11
26 struck by the constructive and positive sentiments
27 which have been expressed in those meetings which
28 sentiments have now received very substantial support
29 from the product the Inquiry has already received from

1 the government of Ireland and received on a continuing
2 basis.

3
4 Inevitably there are matters which require ironing out
5 as issues arise, such as access to sensitive material 11:12
6 under paragraph 25 of the Memorandum of Understanding,
7 and we are still a long way off being able to say that
8 all issues have been dealt with. But it is important
9 that we say that the experience of the Inquiry Legal
10 Team to date, is that those that we are dealing with in 11:12
11 the AGS are responsive to our communications and have
12 kept the necessary deadlines required for the efficient
13 processing of this material from relevance through to
14 the application of redactions.

15 11:12
16 All of this is to say that although the substantial
17 progress we're seeing has only recently begun and
18 although there is still undoubtedly a long way to go,
19 with the completion of disclosure of AGS material to
20 the Inquiry relating to the Omagh bombing expected to 11:13
21 conclude in June it is appropriate, in our view, that
22 we acknowledge the considerable efforts that have been
23 made and the effective progress that is currently being
24 made and the Inquiry Legal Team, we should say publicly
25 is grateful for those efforts by the government of 11:13
26 Ireland and, moreover, is grateful for that progress.
27 But we don't underestimate the size of the request that
28 we've made of the AGS nor indeed the challenging issues
29 which may need to be navigated.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

One such challenging issue is the resolution of disclosure of sensitive third party equity material. Sir, that is to say either material held by the AGS which contains sensitive information which originates from the PSNI or material held by the PSNI which contains sensitive information which originates from the AGS. In neither case would it be appropriate for this material to be simply handed over to the Inquiry without proper handling protocols being put in place and with the respective third party being aware of what was happening. So, sir, we hope that makes sense. We recognise and have experienced that the AGS will be in possession of material contains PSNI equities and vice versa and it is not, we have acknowledged, appropriate for that material simply to be handed over without more ado.

In relation to this issue of third party disclosure, to which a solution needs to be found, at the Inquiry Legal Team's request the government of Ireland and PSNI have provided the following joint statement which they've agreed should be shared at this hearing. So sir, this is very fresh indeed and I quote from that joint statement.

"The PSNI and AGS have developed strong working relationships for the benefit of the Omagh Inquiry. Legal representatives and officers have formed lines of

1 direct communication to allow the relevant teams to
2 meet and discuss pertinent matters that effect both
3 organisations and their roles in serving the needs of
4 the Inquiry. We provide the short note so that all CPs
5 can understand the joint practical steps being taken by 11:15
6 both organisations to ensure that disclosure is
7 progressed as swiftly as possible. Both organisations
8 are committed to transparency and candour in all ways
9 of working. We welcome this opportunity to share this
10 information with CPs and their representatives. 11:16

11 It was expected..."

12

13 **Continues the joint statement:**

14

15 "...and has materialised that both PSNI and AGS would 11:16
16 hold a significant amount of material that was provided
17 by the other. This includes both non-sensitive and
18 sensitive material. Both organisations recognise that
19 in the spirit of joint working relationships there is
20 an important need for each to liaise with the other in 11:16
21 terms of material ownership and disclosure. This is
22 not a new way of working and would also be the case in
23 any other proceedings that involve the disclosure of
24 material that was not owned by the disclosure provider.
25 This is because the only organisation will be best 11:16
26 placed to understand and assess the impact of the
27 disclosure into the wider public domain.

28 Where sensitive material is concerned this will require
29 in person meetings between the officers to view and

1 discuss the material. The ability to share sensitive
2 information digitally via sufficiently secure IT
3 systems does not exist. PSNI and AGS can advise that
4 examples of partnership working in respect of sensitive
5 material have already occurred, such as the progression 11:17
6 of the disclosure of the McVicker Report in a manner
7 that was agreeable to all information owners.
8 At this stage it's apparent..."

9
10 **Continues yet further the joint statement:** 11:17

11
12 "...that the greater volume of material that requires
13 AGS, PSNI co-operation is non-sensitive and is largely
14 held by PSNI. In assessing its disclosure tranches
15 PSNI has identified, at the date of writing, in the 11:18
16 region of 200 to 300 documents that originate from AGS
17 within PSNI's disclosure material. Each of those
18 documents range from a small number of pages to almost
19 100 pages in length. PSNI can advise that it took
20 steps to manually prepare hard copies of almost 200 11:18
21 documents in February 2026 for physical transfer to the
22 AGS. There are regular exchanges of such material and
23 AGS has similar and parallel processes for the review
24 of PSNI material. The PSNI is grateful to the AGS for
25 its co-operation in the collection of those materials 11:18
26 for the purposes of AGS assessment. It may also assist
27 to explain the practical steps required in the sharing
28 of hard copy material. Upon receipt of the hard copy
29 material AGS has commenced a manual review of those

1 documents and will be required to provide the PSNI with
2 commentary on each individual item in terms of whether
3 it may be disclosed with or without redaction.

4 Where redaction is sought the specific areas of
5 redaction will need to be highlighted and explained. 11:19

6 Those assessments then need to be provided to PSNI and
7 PSNI will need to manually input those assessments into
8 the MP platform..."

9
10 **That's material provider platform:** 11:19

11
12 "...of relatively. Those steps will very evidently be
13 resource and time intensive. This is not beneficial to
14 PSNI, AGS, Inquiry or CPs. For that reason in January
15 of 2026, PSNI asked the Inquiry Legal Team to provide a 11:19
16 facility whereby AGS can undertake an MP..."

17
18 **Again material provider:**

19
20 "...review on relatively." 11:20

21
22 **relatively being a database.**

23
24 "Discussions on this proposal have continued..."

25
26 **Continues the joint statement:** 11:20

27
28 "...through February 2026. AGS and PSNI look forward
29 to working with the Inquiry to achieve this joint aim

1 of swifter review while making more efficient use of
2 available IT. However, the protection of material has
3 to be at the forefront of our minds while we attempt to
4 achieve greater efficiencies. "

5 And the joint statement ends with these words:

11:20

6
7 "PSNI and AGS remain committed to developing this joint
8 way of working and will continue to meet regularly to
9 progress these important areas of disclosure. "

10
11:20

10 That concludes the joint statement of the AGS and PSNI.

11
12
13 Sir, we're grateful for this and we will continue to
14 keep under review how well this relationship is working
15 by reference to the material which the Inquiry receives
16 from the AGS and from PSNI.

11:21

17
18 It goes without saying that the disclosure of AGS
19 material is far from the only contribution the Inquiry
20 is expecting from the government of Ireland. There are
21 two particular further areas which we acknowledge at
22 this stage as matters which are in progress and in
23 relation to which work continues, so two further
24 matters relating to the work that we have under way
25 with the government of Ireland.

11:21

26
27 The first of those two matters is disclosure of
28 materials from parts of the Irish State outside of that
29 material that the AGS is currently in the process of

1 disclosing which material is focused on the Omagh bomb
2 investigation itself. The Inquiry continues to raise
3 and brackets disclosure requests for this material and
4 we have already received some of this material, which
5 has been disclosed to Core Participants. Sir, we are 11:22
6 continuing to work with the government of Ireland in
7 relation to this area of its contribution to the work
8 of the Inquiry.

9
10 The second of these further areas relates to witnesses 11:22
11 from the Republic of Ireland giving evidence to your
12 investigation. We don't propose, sir, to say very much
13 about this beyond acknowledging the current state of
14 affairs.

15 11:22
16 Late last year a consultation was opened by the
17 government of Ireland with a proposed framework which
18 amended an existing piece of Irish legislation, namely
19 the International Co-Operation Act 2019. On your
20 behalf the Inquiry Legal Team did provide a response to 11:23
21 the consultation we have just described. We don't
22 intend to rehearse the content of that response for two
23 reasons;

24
25 Firstly, because it was circulated to all Core 11:23
26 Participants in January and so, all who are most
27 directly affected know and can understand your position
28 in response to the proposals of the government of
29 Ireland.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

Second because since then things have moved on. Last week, following the closure of the consultation period, the Irish government published a bill entitled "International Co-Operation Omagh Bombing Inquiry Bill." That Bill sets out the position of the Irish government in relation to this issue. Their position is that the appropriate way for certain categories of witness, namely former ministerial office holders, current or former Irish State officials and current or former members of the AGS, to give evidence to the Inquiry is through that statutory framework. So that is their position.

11:23

11:24

Sir, we can well understand, indeed we know, that the mechanism for evidence to be given to the Inquiry in that Bill does not accord with the expectation or wishes of at least some Core Participants. Nevertheless, having made our submissions to the government of Ireland following a period of negotiations in which the Inquiry's primary position was clearly laid out to the government of Ireland, we do not consider this hearing to be an appropriate occasion for Core Participants to express their views about it.

11:24

11:24

11:24

Sir, the Inquiry has put much work into this issue as we are certain all Core Participants know and currently we are, if we can put it this way, we are where we are.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

Topic three for today's update is, as we indicated, a topic of disclosure and requests for witness statements that have been made by the Inquiry Legal Team. Sir, we'll begin with some headline figures before providing a little more detail and then concluding with an area of particular focus for the Inquiry Legal Team. 11:25

The headline figures are these; the Inquiry holds approaching 450,000 pages of open disclosure. So not far short of half a million pages. All disclosure to the Inquiry has to go through a process before it can be disclosed on to Core Participants, that is absolutely vital. Many will be familiar with what that process is but it's important that we provide a reminder so that the scale of the undertaking and progress against it by the Inquiry Legal Team can be judged fairly. 11:26

All open documents received by the Inquiry need to be assessed for relevance to the Terms of Reference of your investigation, sir, and they need to be checked for duplication. And can I say it isn't at all unusual for the Inquiry to receive a number of copies of the same document and it helps no-one for us to send out the Core Participants many copies of a single document. 11:26

Furthermore, any handwriting needs to be deciphered. The documents need to be considered for redactions

1 mandated by data protection and privacy laws. Your
2 ruling made earlier in this process, sir, in relation
3 to suspects, needs to be applied. The issue of
4 operational sensitivity, which again has been the
5 subject of a ruling by you, sir, needs to be judged and 11:27
6 if required, as sometimes it is, two versions of the
7 document or parts of it need to be created. One for
8 the open database and one for the operationally
9 sensitive database both of which, of course, our Core
10 Participants have access to. 11:27

11
12 After all of that has occurred a dialogue with strict
13 time scales needs to be had with the relevant material
14 provider and, if necessary, any third party with an
15 interest. At the conclusion of the process relevant 11:27
16 and appropriately redacted documents are disclosed to
17 Core Participants and so, sir, anyone that wasn't aware
18 of what the process was will understand that it is
19 complex and time consuming.

20 11:28
21 As matters stand, 18 tranches of disclosure to Core
22 Participants comprising in excess of 100,000 pages of
23 documents have been disclosed by the Inquiry. The
24 process often works well, indeed very well. HMG, his
25 Majesty's government and as we've said, the AGS, are 11:28
26 examples of that.

27
28 In short, sir, what we have to undertake is vast.
29 Notwithstanding, very considerable progress has been

1 made. Of course that progress is not and cannot be
2 progressed for its own sake, rather it is progressed
3 towards the oral evidence hearings, the first of which
4 will be Chapter 3.

5
6 It's of the highest degree of importance that this
7 work, which involves very substantial input from all
8 the Inquiry's material providers, is efficient and
9 constructive. And may we repeat that. It's of the

10 highest degree of importance that this work, the work
11 of disclosure and the process which is undertaken,
12 which involves very substantial input from all the
13 Inquiry's material providers, is efficient and
14 constructive because, if it is not, it will place the
15 Chapter 3 hearing under threat and it will interfere,
16 sir, with your intention to commence the Chapter 4 oral
17 evidence hearings in early 2027. And we will return to
18 the importance of that disclosure work being efficient
19 and constructive when we deal with our final point on
20 this topic of disclosure.

21
22 Before we do so, there is a little more detail to
23 provide. Much of this detail has already been provided
24 to Core Participants but it is important, in our view,
25 that the wider public is aware of it too. Based on the
26 disclosure the Inquiry has received to date, requests
27 for witness statements under Rule 9 of the Inquiry
28 Rules of 2006, have been made. A number of key
29 individuals in the narrative of events before and after

1 the Omagh bombing have been approached and these
2 include, and sir we certainly emphasise that word,
3 "include", John Ware, an award winning journalist whose
4 two Panorama documentaries, the first in 2000 and the
5 2008 can now be seen with the benefit of hindsight as 11:30
6 important points in the journey towards this Inquiry.
7 Martin Bridger, who worked as a lead investigator for
8 PONI in the period after the Omagh bombing and who
9 interviewed Sergeant John White of the AGS and a man
10 going by the name Kevin Fulton, who was an informant 11:31
11 who had access to significant figures within the IRA.
12 It was Mr. Bridger who was involved with PONI at key
13 moments in the process subsequent to Omagh and who was
14 later, of course, the author of what is known as the
15 Bridger Report. Each of the significant figures in the 11:31
16 Omagh bombing narrative, sir, has informed the Inquiry
17 Legal Team of their willingness to contribute to the
18 work of the Inquiry. In addition to those individuals
19 the Inquiry continues to engage with Detective
20 Superintendent Baxter, Norman Baxter, who became the 11:31
21 senior investigating officer of the Omagh bombing
22 investigation in May 2002 and we also continue to
23 engage with his deputy.

24
25 The PSNI has also been the subject of a number of 11:32
26 statement requests, including one relating to the use
27 of what is known as HOLMES, that is to say, Home Office
28 Large and Major Inquiry System, the electronic system
29 by which large and major inquiries were to be conducted

1 by 1996 and a corporate statement setting out the
2 structures which were contained within and surrounded
3 CID at the time with which we're concerned has also
4 been sought from PSNI.

5
6 A number of statement requests addressed to individual
7 officers have also been sent with responses to some of
8 those in the hands of the Inquiry Legal Team and in the
9 process of being disclosed.

10
11 Furthermore, a significant statement recently disclosed
12 to Core Participants, which was prepared by PSNI,
13 identifies those suspected of participation in the
14 Omagh bombing and some of the evidential basis for that
15 suspicion. At the risk of repetition this will form a
16 key element of what we have termed Part 10 of
17 Chapter 3, the purpose of which is to draw together the
18 evidence identifying those who are responsible for the
19 Omagh bombing.

20
21 The Inquiry Legal Team will continue to be relentless
22 in its efforts to identify witnesses who have relevant
23 evidence to give. Sir, we conclude the update in
24 relation to open disclosure and request for statements
25 by returning to the issue of efficient and constructive
26 relationships. Sir, we do so acknowledging that all
27 material providers are working hard in difficult
28 circumstances to comply with substantial and sometimes
29 frequent requests. And in saying what we do next we

1 don't in any way seek to suggest that there are not a
2 very large number of people across a number of
3 organisations who are doing their best to ensure that
4 this Inquiry, your Inquiry, sir, makes the progress
5 that it must.

11:34

6
7 However, all timetables set for any of the Inquiry
8 processes whether disclosure or statement requests are
9 imposed with a view to being achievable. While
10 simultaneously ensuring that momentum is maintained as
11 surely it must be maintained. It's imperative that
12 everyone involved in this Inquiry is working tirelessly
13 towards ensuring it is conducted in both a
14 comprehensive and in a timely way.

11:34

15
16 With all of this in mind, sir, we take this opportunity
17 today to publicly record that it's the view of the
18 Inquiry Legal Team that as the pressure increases it
19 will be vitally important that all material providers
20 are properly resourced to meet the due requirements for
21 this Inquiry of being comprehensive and timely. When
22 deadlines are set by the Inquiry they must be adhered
23 to. If, for good reason they cannot be adhered to,
24 applications for extensions must be sought as soon as
25 that state of affairs is identified. The Inquiry Legal
26 Team simply cannot work effectively if material
27 providers are having to be chased long after deadlines
28 have been missed. And, sir, to use a phrase we used
29 earlier, that seems to us to be beyond obvious.

11:35

11:35

11:35

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

Sir, we judge that this is not the occasion for descending into further material. We have raised that material with those who we consider require an adjustment to their approach and, if necessary, an uplift in resourcing. As matters stand we consider that there is still time for a course correction. And we say to those to whom we have been speaking, this is your chance. However, we do have sufficient concern about the risk of loss of momentum, that if necessary, sir, we will bring this matter back at a procedural hearing in May with a view to a more detailed analysis being conducted, but our hope is that that will not be necessary.

11:36
11:36

Sir, I am going to check because we do, of course, need to have breaks from time to time for the benefit of those who are making a record of what I am saying. I do not think I will conclude my remarks within a period of time that will mean that we don't need to have a break so now would be a convenient moment for a break. I can see nods, sir, so would you rise for 15 minutes or so.

11:37
11:37

THE HEARING RESUMED AFTER A SHORT ADJOURNMENT AS FOLLOWS:

11:37

CHAIRPERSON: Mr. Greaney.

1 MR. GREANEY: Our attention has been drawn to a
2 newspaper report or part of, and I won't identify what
3 newspaper is concerned because there is an opportunity
4 for them to put it right, what we consider to be a
5 serious misreporting, in their report.

11:57

6
7 The report:

8
9 "The hearing of the Omagh Bomb Inquiry will take place
10 six months later than scheduled, the lead counsel to
11 the Inquiry has said..."

11:57

12
13 And a little later in the piece, the, "he" is a
14 reference to me:

15
16 "...said the delay was due to material originating from
17 the Republic of Ireland not being available."

11:57

18
19 Sir, that is not in fact what I said and moreover that
20 is not an accurate reflection of the position. The
21 position is that it became necessary for you to vacate
22 the hearing of the 9th of March for, as I said earlier,
23 several reasons, only one of which was the need to
24 receive from and process the disclosure material
25 originating from the Republic of Ireland. So I hope
26 that position if it hasn't been understood clearly to
27 date is now understood and any reporting, therefore,
28 accurately reflects what has been said today and what
29 the true position is.

11:58

11:58

1 CHAIRPERSON: well, there is no reason for the position
2 to be misunderstood.

3 MR. GREANEY: No, there is not, sir.

4 CHAIRPERSON: It was expressed in entirely plain and
5 clear terms. And it's unacceptable that a report of 11:58
6 the public proceedings should be published in such
7 inaccurate fashion particularly concerning a matter of
8 such sensitivity and importance.

9 MR. GREANEY: So we entirely agree with those remarks
10 and thank you for making them. 11:59
11

12 Sir, after that unfortunate interlude, we'll return to
13 the business at hand, namely, an update for the Core
14 Participants and public about progress to date. And we
15 are now turning to the fourth of our five topics, the 11:59
16 Closed Material Restriction Order Process.

17

18 As the Terms of Reference recognise and as
19 representatives of Core Participants have, on a number
20 of occasions, realistically acknowledged, it is 11:59
21 inevitable that some of the material, which it is
22 necessary to investigate for you, sir, to discharge the
23 Terms of Reference will be as it's termed "closed."
24 And by "closed" we mean it is material that cannot, due
25 to justified national security sensitivity, be 12:00
26 disclosed or explored outside of a narrowly defined
27 group of people.

28

29 Under the Inquiries Act 2005, which takes as its

1 starting point that:

2
3 "Oral evidence in a statutory Inquiry should be
4 publicly heard."

5
6 withholding material from Core Participants and the
7 public requires the legal test under Section 19 of that
8 Act be satisfied. That test requires you, sir, to
9 understand and ultimately rule upon the risk of harm or
10 damage that wider disclosure of that material may give
11 rise to. 12:00

12
13 At the risk of stating the obvious the navigation of
14 these issues is far from straightforward. The
15 motivation behind genuine and justified claims that 12:00
16 material should be closed is the protection of national
17 security. So, in other words, preventing those hostile
18 actors who would wish us harm from learning of things
19 that they would then use to advance that aim.

20 Conversely, for those excluded from access and here we 12:01
21 are thinking particularly, of course, of bereaved
22 families and survivors, not being permitted access to
23 evidence which bears directly upon the answers they
24 seek will, to put it mildly, never be a comfortable or
25 satisfactory position then, can we say we entirely 12:01
26 understand that.

27
28 The duty imposed by the Inquiry's Act 2005 requires
29 sir, you, with the support of us, as your legal team,

1 to test and test robustly claims which are said to give
2 rise to a legitimate exception to the open justice
3 principle.

4
5 In January of this year the Inquiry Legal Team 12:02
6 published three documents which together set out a
7 comprehensive framework for the management of
8 provisionally closed material. All of these documents,
9 the documents we have published, are available on the
10 Inquiry website. Provisionally closed material is 12:02
11 material which has been disclosed to the Inquiry on its
12 closed IT systems and which requires to be a subject of
13 Restriction Order under Section 19 of the Act of 2005
14 if it is to be withheld from other Core Participants.

15 12:02
16 The comprehensive framework which the Inquiry Legal
17 Team set out in the CMRO notes earlier this year, is
18 the scheme by which these restriction orders are to be
19 determined. That scheme takes the same approach as was
20 taken in the operationally sensitive restriction 12:03
21 process, namely, by testing the principles against
22 sample documents falling into particular categories.
23 This sample and category approach has a very
24 substantial benefit. It permits for a ruling from you,
25 sir, against a manageable and defined group of 12:03
26 documents across a range of potentially sensitive
27 issues. That ruling, once given, will then provide the
28 basis for the management of the remainder of the
29 provisionally closed material. Removing the need for

1 what could be potentially thousands of individual
2 Restriction Order applications line by line against
3 paragraphs or pages or whole documents which are
4 currently within the provisionally closed material.
5 Sir, such a process, if we were required to undertake 12:03
6 it, would take years to complete and would be wholly
7 unnecessary.

8
9 Of course, as the CMRO process itself acknowledges,
10 where documents do not fall into categories established 12:04
11 by the ruling then a further ruling, following the same
12 approach, will be required. But the steps identified
13 in the Inquiry Legal Team notes are intended to avoid
14 the need for that as far as is possible. They are also
15 intended to simplify the position in relation to 12:04
16 material providers who have disclosed only a very
17 limited amount of provisionally closed material.
18 In the case of these material providers, the challenge
19 is to establish whether those material providers are
20 asserting that the documents cannot be more widely 12:04
21 disclosed or whether, in fact, the sensitive material
22 belongs to a different organisation and again, the CMRO
23 process accommodates that situation.

24
25 Having set out the overarching structure we don't 12:05
26 propose to rehearse all of the steps set out in the
27 Inquiry Legal Team CMRO notes, but they can be
28 summarised in this way; they are designed and intended
29 to create a situation in which a suitable cohort of

1 sample documents and categories are identified. That
2 the categories are shared with those who are not cited
3 on the closed material content with a view to
4 maximising the opportunity for meaningful contribution
5 by them and that in the course of the first two weeks 12:05
6 of September this year, as we've mentioned already, the
7 applications will be heard. So the first week, a week
8 in open, so the family and survivor Core Participants
9 can make their submissions along with the media and
10 then subsequently the need, as is inevitable, for a 12:05
11 closed hearing.

12
13 Before we leave the subject of the CMRO process, it's
14 appropriate for us to say something further about the
15 need for efficient and constructive engagement from 12:06
16 material providers on the closed side. What we have to
17 say is identical in sentiment to what we said about
18 open disclosure and witness statements just before we
19 took our 15 minute break. It is of a high degree of
20 importance that the CMRO process is resolved in 12:06
21 accordance with the timetable that has been set. That
22 necessitates all material providers working digitally,
23 about which we will say something more in a moment and
24 in a way that is transparent with the Inquiry Legal
25 Team. This requires all material to be scanned in an 12:06
26 appropriate, secure way and transferred to the Inquiry
27 Legal Team on the secure IT system that it's using. It
28 must be catalogued and it must be properly indexed.
29 And nothing must be allowed to fall between the cracks

1 or to delay the Inquiry's progress.

2
3 As with the open disclosure and witness statements,
4 it's not necessary or helpful to descend into further
5 detail at this stage. However, as with that topic we 12:07
6 publicly register our concern that in relation to some
7 of those with whom we have been in correspondence about
8 this issue, a course correction is required. It's well
9 understood, sir, by your team, that this is a
10 challenging and technically difficult area. However, 12:07
11 solutions must be found so that all relevant material
12 responsive to the requests which have already been
13 made, some such requests being well over a year old, is
14 available to the Inquiry.

15 12:08
16 The CMRO process is a key stepping stone to breaking
17 out into open what can be broken out and preparing what
18 remains for the closed hearings. But it will be in the
19 hearings that follow that process that the Terms of
20 Reference will be answered. As we've said before it is 12:08
21 essential that those hearings are comprehensive and
22 timely.

23
24 The fifth and final matter of update before, sir, we'll
25 invite you to break for lunch and hear submissions on 12:08
26 anonymity after lunch. The fifth and final matter in
27 relation to which we are providing an update today,
28 relates to the Inquiry's closed facilities. Ordinarily
29 this would not be a subject which needed to be raised

1 publicly, it's an issue that the Core Participants and
2 the wider public would rightly expect should be
3 resolved efficiently and behind the scenes.
4

5 Furthermore, it's a subject about which, if it is to be 12:09
6 raised, care needs to be taken given the sensitivities
7 which surround sites which provide access to closed
8 facilities.
9

10 Despite all of this the Inquiry Legal Team thought it 12:09
11 was important that this issue be ventilated at this
12 stage because progress has not been as smooth or
13 satisfactory as may have been assumed. And that, in
14 turn, has had an impact on the Inquiry's Legal Team
15 ability to progress the closed side of this Inquiry. 12:09
16

17 Before we go any further we would wish to acknowledge
18 thank the Northern Ireland Office for the position
19 which has recently been secured in London and which we
20 are anticipating will shortly be secured in Northern 12:09
21 Ireland.

22 CHAIRPERSON: That's the Northern Ireland Office acting
23 as the sponsoring department for the Inquiry?

24 MR. GREANEY: Precisely that sir, yes. As all Core
25 Participants will understand, the volume of material, 12:10
26 which is relevant to this Inquiry's Terms of Reference,
27 necessitates digital working. The idea that we might
28 work from hard copies only needs to be stated out loud
29 to realise that it would be ludicrous. And the digital

1 working is a necessity, so despite the fact in 1997 and
2 1998 the digital revolution was, to say the least, not
3 at the stage it has now reached. Digital working on
4 the closed side requires access to a highly secure
5 network which ensures that national security 12:10
6 sensitivity material is securely held. And it will be
7 a surprise to no one, bearing in mind the subject
8 matter, sir, of your Terms of Reference, that the
9 Inquiry has arranged for and last year was given access
10 to such a network. However, the use of that network 12:11
11 requires that terminals, which are only available in
12 accredited environments, can be accessed so that
13 material which is on the network can be viewed, managed
14 and developed in an appropriate way.

15
16 This, we have to say, has not proved to be
17 straightforward. We'll start with the position in
18 Northern Ireland. At an early stage of the work of the
19 Inquiry a location was identified which was intended to
20 give access to the secured system. However, that 12:11
21 facility still has not been completed. As such those
22 members of the Inquiry Legal Team based in or working
23 from Northern Ireland, do not have unfettered access to
24 the secure system while here and arrangements have to
25 be made to be hosted by other organisations. As may be 12:12
26 obvious that situation is not conducive to efficient
27 working.

28
29 The current position, as we understand it, is that the

1 facility in Northern Ireland will be completed by the
2 end of next month, so at the end of April. But there
3 will then be a further period of delay about which we
4 are currently uncertain as to the period, while the IT
5 that we need is installed. That state of affairs is 12:12
6 not satisfactory. The position in London has been
7 better but was still unsatisfactory. A shared
8 arrangement was provided but far too few terminals were
9 there and in circumstances, we were given access in
10 circumstances in which there were permissions and 12:13
11 sometimes constraints which were required for parts of
12 the ordinary working week. We're pleased to report
13 that a solution has been found for this in London,
14 which is due to commence at the end of this month,
15 March. It will provide exclusive access to the 12:13
16 necessary IT system in an environment which is much
17 better suited to the nature of the work of the Inquiry.

18
19 The arrangements, sir, in London, was arrived at as a
20 result of a meeting that you had with the Permanent 12:13
21 Secretary to the Northern Ireland Office last month
22 following concerns being raised by you, sir, over a
23 substantial period of time about the unsatisfactory
24 nature of the arrangements then in place. The Inquiry
25 is grateful that a solution has now been found 12:14
26 particularly as the Closed Material Restriction Order
27 Process, as we have said already, gathers pace towards
28 resolution in September.

29 CHAIRPERSON: And perhaps it should be clearly

1 understood, lest there should be any doubt about it,
2 that although the Secretary of State for Northern
3 Ireland is a Core Participant in these proceedings, my
4 discussions and correspondence with the Permanent
5 Secretary was in her capacity as head of the sponsoring 12:14
6 department.

7 MR. GREANEY: Sir, again, precisely that. Sir, we've
8 nearly completed our update. But before we leave the
9 issue, this fifth issue that we have been dealing with,
10 we should provide one further detail which we hope will 12:14
11 provide reassurance. Recognising that this issue was
12 developing last year, the Inquiry has taken steps to
13 ensure that whatever time has been lost by these
14 unsatisfactory arrangements can be gained back. As a
15 result there will be a surge in the Inquiry Team 12:15
16 resources on the closed side to put us back to where we
17 should have been, that surge has started and will
18 further increase once the new facility in London is
19 available to us at the end of this month.

20
21 Sir, that is all we propose to say by way of update.
22 We hope that it has been helpful and informative both
23 for the Core Participants and for the general public.
24 And as we indicated at the very beginning of our
25 observations, it doesn't seem to us that this part of 12:15
26 the hearing will benefit from submissions or
27 observations from the Core Participants. And assuming
28 that that is so, this would be an appropriate time to
29 take our lunch break for, sir, we suggest, an hour or

1 so, so until about 20 past 1 when we will return and we
2 will make some submissions about the applications for
3 anonymity of witnesses that you have received from his
4 Majesty's government and the Police Service of Northern
5 Ireland.

12:16

6 CHAIRPERSON: All right. Thank you, Mr. Greaney.

7
8 LUNCHEON ADJOURNMENT

9
10
11 THE HEARING CONTINUED AFTER THE LUNCHEON ADJOURNMENT AS
12 FOLLOWS:

13
14 CHAIRPERSON: Mr. Greaney.

15 MR. GREANEY: Good afternoon, at about a quarter to
16 midday today, we took a break from the proceedings, we
17 returned to court at about midday itself. In between
18 those two times the Inquiry Legal Team became aware of
19 some concerning reporting which had started to appear
20 on the Internet. And the reporting was concerning
21 because it was inaccurate and unfair to the government
22 of Ireland that there was an exchange, sir, between you
23 and I during the course of which you expressed some
24 firm views of your own. Unfortunately, for reasons
25 that I am not fully aware of at the moment, that
26 exchange between the two of us was not broadcast on
27 YouTube and it is, therefore, likely that the media is
28 unaware of it. In any event, in the period since
29 midday we have become aware that the problem is more

13:39

13:40

13:40

1 widespread and deeper than we understood at that stage.

2 CHAIRPERSON: Mr. Greaney can I just ask you to pause
3 for a moment.

4 MR. GREANEY: Yes.

5 CHAIRPERSON: My transcript isn't picking up any of
6 your submissions just at the moment, it's possible
7 that --

13:41

8 MR. GREANEY: Mine is.

9 CHAIRPERSON: It's probably something I am doing
10 incorrectly.

13:41

11 MR. GREANEY: Mr. Suter will -- I said there would be
12 teething problems in the new building, here is another
13 one. If you would just bear with us I'm sure Mr. Suter
14 will try and sort it out. It's all up and running now.

15 CHAIRPERSON: Yes.

13:43

16 MR. GREANEY: So the upshot of what I have been told,
17 and I have been told in the last couple of minutes a
18 number of things by a number of people, is that what I
19 said at about midday today about the inaccurate and
20 unfair reporting was not broadcast either on YouTube
21 and/or to the Press room downstairs. In any case there
22 is a realistic possibility that the Press is unaware
23 that there is inaccurate and unfair reporting out
24 there.

13:44

25

13:44

26 So, sir, what I am going to do is just go back to the
27 start, back to midday, explain what it was that has
28 given rise to a concern and then go on to explain why
29 that concern has deepened over the course of the nearly

1 two hours since then.

2
3 So shortly before midday we became aware of a news
4 piece that had been published on the web page of a
5 prominent newspaper in Northern Ireland. And what that 13:44
6 piece said, and I won't name the paper, because there
7 are reasons to believe that the error does not lie with
8 them. What the piece said:

9
10 "The next phase of hearings at the Omagh Bombing 13:45
11 Inquiry will take place six months later than scheduled
12 the Lead Counsel to the Inquiry has said. On Thursday
13 Paul Greaney KC said that they will now begin on
14 September the 21st. He said..."

15 13:45
16 The report continues:

17
18 "The delay was due to material originating from the
19 Republic of Ireland not being available."

20 13:45
21 And so the report, I was going to say gave the
22 impression, it didn't just give the impression, the
23 report effectively stated that our position had been
24 that the reason for the postponement, described as
25 delay, of Chapter 3 was because the Republic of Ireland 13:45
26 had not made material available which would have been
27 bad enough. Since then we have become aware of other
28 reports on other news websites, one of them, again I
29 won't give the name of the website because again there

1 are grounds to believe that the fault may not rest with
2 them but the second report that I'm looking at reads:

3
4 "The next phase of hearings at the Omagh Bombing
5 Inquiry will take place six months later than 13:46
6 scheduled. The delay is being blamed on material from
7 the South not being available."

8
9 So, sir, the position is that I most certainly did not
10 say during the course of my remarks this morning that 13:46
11 there was only one reason why Chapter 3 was being
12 postponed. Still less did I seek to attribute any
13 blame to anyone and certainly not to the Republic of
14 Ireland. What I explained during the course of my
15 submissions to you, sir, was that there were several 13:47
16 reasons why it had proved necessary to postpone
17 Chapter 3.

18
19 So the way in which the reporting has come out is
20 undoubtedly inaccurate. It is undoubtedly unfair to 13:47
21 the government of Ireland, sir, and as you observed in
22 the exchange between us that was not broadcast, that is
23 particularly unfortunate given the sensitivity of
24 issues relating to the government of Ireland and our
25 relationship with them. 13:47

26
27 I am told that it is likely that the problem with the
28 inaccuracy of the reporting emanates from a single
29 source, namely the Press Association. And I have also

1 been told in the last few seconds that the Press
2 Association has corrected its piece in relation to this
3 so that it is to be hoped that there is no further
4 inaccurate reporting of this type.
5 But can we be clear, anyone who has based their 13:48
6 reporting of the proceedings this morning on the basis
7 that we suggested that the government of Ireland was
8 the sole cause for the need for the postponement,
9 anyone who has reported on the basis of the PA report
10 that the government of Ireland was being blamed, has 13:48
11 made a serious error and must correct it.
12 CHAIRPERSON: well it's most disappointing.
13 Mr. Greaney. The arrangements through which the Press
14 Association report on proceedings in inquiries, such as
15 this, are well-known and are relied upon, both by the 13:48
16 tribunals and by fellow journalists, relied upon to the
17 extent that trust is imposed on the Press Association
18 accurately recording what is being said in the
19 proceedings and to provide accurate information to
20 their journalistic colleagues. It is extremely 13:49
21 unfortunate that that hasn't turned out to be the case
22 during the course of today's proceedings and it really
23 mustn't be allowed to repeat itself.
24 MR. GREANEY: Sir, we entirely agree. We'll turn then
25 back to the purpose or purposes for which we are all 13:49
26 here today. As I indicated at the beginning of today,
27 the second broad topic that we are going to be dealing
28 relates to applications that have been made by the
29 Police Service of Northern Ireland and his Majesty's

1 government for anonymity for witnesses whose interests
2 those organisations represent. Sir, to be clear by
3 anonymity, we mean the withholding of a name of the
4 witness from the public and from Core Participants or,
5 in certain cases, only from the public pursuant to a
6 Restriction Order under Section 19 of the Act. 13:50

7 The question of whether a witness should be granted
8 special measures, so in particular screening, whether
9 or not they have anonymity is, in our view, a separate
10 issue that we intend should be dealt with later once 13:50
11 the identity of those witnesses who must give live
12 evidence is known. Because, as is obvious, a witness
13 who is not called to give live evidence does not
14 require a screen. So, the order of these things, the
15 sequence of these things needs to be to address 13:51
16 anonymity first and then separately and subsequently
17 address the issue of any special measures that any
18 witness, whether they have anonymity or not, seeks.

19
20 The Inquiry Legal Team, sir, as you know very well, 13:51
21 published an anonymity protocol as long ago as the
22 11th of July of last year. More recently on the 2nd of
23 February of this year, the Inquiry Legal Team published
24 a note on the Inquiry's process, or at any rate,
25 proposed process for restriction orders for anonymity. 13:51
26 Each of those documents is on the Inquiry website and,
27 sir, we see no value for you or indeed for anyone in us
28 rehearsing the content of either or both of those
29 documents. That is for two particular reasons.

1 First, as we understand it, no-one takes issue with the
2 procedure that we have submitted is the appropriate one
3 of you, sir, ruling on a number of sample applications
4 for anonymity enabling the principles to be established
5 and then applied to subsequent applications. 13:52

6
7 And, second, the note published on the second of
8 February addressed what we, the Inquiry Legal Team
9 consider, to be the relevant legal principles that
10 ought to be applied to applications for anonymity in, 13:52
11 sir, your Inquiry. And that is so whether the relevant
12 principle arises under the duty of fairness at common
13 law and/or under s.17 of the Act of 2005 or under
14 Article 2 or possibly Article 8 of the Convention.

15 13:52
16 In the result, having studied the submissions of
17 others, we sir, don't detect much, if any material
18 difference between the views that we expressed in the
19 note about principles and the views of others who have
20 made submissions in writing. So, going through the 13:53
21 note, let alone going through the detail of the
22 authorities seems to us to have no value for you.

23
24 So, we do though consider it important that we should
25 say the following, which relates to principles; 13:53

26
27 One, open justice is a fundamental principle to which
28 you must have regard in considering these applications.
29 And we know that you will need no persuading of that as

1 a proposition given, sir, that you have made clear on a
2 number of occasions that open justice would be at the
3 forefront of your thinking in your rulings on any
4 relevant issue.

13:53

5
6 Two, however, where the Article 2 rights of an
7 individual are engaged, it is at the very least highly
8 unlikely that they will be trumped by the Article 10
9 rights of the Press.

13:54

10
11 Three, each application made now or in the future must,
12 we accept and agree, be given separate consideration
13 but on the basis of the principles that are established
14 by your ruling.

13:54

15
16 And four, the principles that bear upon the
17 applications apply just as much in Northern Ireland as
18 in any other part of the United Kingdom. So, the legal
19 framework is common across the United Kingdom.

13:54

20
21 However, in relation to that fourth point, what you are
22 being asked to do, as we understand it sir, in
23 particular by the submissions of PSNI, is to apply the
24 principles in the context of Northern Ireland. So the
25 submission made on behalf of PSNI is this and we quote
26 from their submissions:

13:54

27
28 "The law is the same, the factual context is
29 different."

1 So, we know that Mr Henry, on behalf of the police,
2 will develop to the extent that he considers
3 appropriate his arguments set out fully in writing on
4 the issue of context. But it seemed to us that the
5 opening words of the judgment of Lord Carswell in the 13:55
6 very well-known case of Re Officer L, sir, which is at
7 tab 23 of the authorities bundle and the passage we're
8 going to cite is at page 677, it seems to us that those
9 opening words provide a useful starting point. And
10 what Lord Carswell said was this, paragraph three of 13:55
11 his opinion:

12
13 "My Lords, Police officers in Northern Ireland have
14 suffered great hardships over many years as the result
15 of the civil disturbances and their manifold
16 consequences. Some 300 were murdered by paramilitaries
17 and many others sustained serious injuries. Numbers of
18 them had to move home, sometimes at very short notice
19 because of an immediate threat of attack. They
20 regularly kept secret, even from their neighbours and
21 friends, the fact that they served in the police and
22 concealed their occupation in documents wherever
23 possible. They and their families lived under constant
24 threat, and could never feel free completely from
25 fear."

26
27 So, it further seems to the Inquiry Legal Team, that
28 C's application for judicial review, the judgment of
29 the Court of Appeal in that case, which is at tab 44,

1 also contains important passages on the issues of
2 context and indeed on other issues. There are a number
3 of passages that are relevant to context.

4 Paragraph 43, at 1226 of the authorities bundle, may be
5 thought particularly striking in which the Court said 13:57
6 the following:

7
8 "In the context of Northern Ireland which has been
9 subjected to decades of homicidal attacks on
10 individuals by organised terrorists, the threat to life 13:57
11 has been real, therefore the bulk of the population is
12 not a threat directed at them individually so that for
13 most the risk is not present and continuing in the
14 sense of immediate to them."

15
16 This was a case that was decided, I think, in 2012.

17
18
19 "For some..."

20
21 The judgment continued.

22
23 "...such as members of the police force, the level of
24 threat has been and continues to be at a much higher
25 level and it is much more immediate. It cannot be 13:58
26 considered as anything close to fanciful and it is
27 significant."

28
29 Furthermore, sir, our view is that the decision of

1 Mr Justice Humphreys, sitting as a Coroner, in the
2 Coagh Inquest, that's at tab 54, is also likely to be
3 of assistance to you, sir, in determining these
4 applications, bearing in mind it too has much to say on
5 the issue of Northern Ireland context and on what is 13:58
6 described in some of the authorities as the
7 precautionary approach that ought to be adopted to
8 applications such as this. That's all we propose to
9 say about matters of principle so far as they bear upon
10 these applications. 13:59

11
12 As for the actual applications that have been made,
13 they speak for themselves and will be spoken to by
14 counsel representing PSNI and HMG. But all we'll say
15 is this; as for the PSNI applications, by written 13:59
16 submissions at tab 14 of the open bundle, PSNI makes an
17 application for anonymity in respect of five former RUC
18 and PSNI officers. In respect of each of them there is
19 a short gist open witness statement, and a closed
20 witness statement, some of which has exhibits. The 13:59
21 level of anonymity sought by three of the officers is
22 anonymity in respect of both the public at large and
23 Core Participants. The level of anonymity sought for
24 the other two is anonymity from the public but not from
25 Core Participants. 14:00

26
27 The damage assessment on which PSNI relies, is the JTAC
28 for which there is a gest, tab 24 of the open bundle
29 and JTAC, the Joint Terrorism Analysis Centre is the

1 body which has responsibility for making risk or damage
2 assessments of that type. That damage assessment
3 confirms that if the name of a former police officer
4 were to be made available in the public domain it will,
5 to quote from the assessment, likely increase the 14:00
6 dissident Republican intent and capability to target
7 that individual. And, sir, in the closed hearing
8 tomorrow you will be able to have regard to the full
9 JTAC assessment and consideration will need to be given
10 to whether more can be broken out than has been broken 14:01
11 out so far.

12
13 There is concern, we have identified among the family
14 groups, advanced particularly in the submissions of
15 Mr Southey, that the damage assessment is not 14:01
16 adequately individual. And it is suggested that you,
17 sir, will not have sufficient information to resolve
18 the applications and that is something which, it seems
19 to us, it would be helpful for PSNI to address in its
20 submissions today. 14:01

21
22 Furthermore, both the submissions of Mr Southey and
23 Mr Toal draw out the feature that we've just identified
24 of two applicants not seeking anonymity from Core
25 Participants. In its submissions today PSNI should, 14:01
26 it seems to us, explain to what extent it relies on the
27 damage assessment or any other evidence to support its
28 proposition that disclosure to Core Participants under
29 Terms of Confidentiality would not be sufficient to

1 protect the rights of all five former officers, not
2 simply two.

3
4 As for the position of HMG, HMG makes a single
5 application for anonymity for a single person who is to 14:02
6 be the corporate witness for GCHQ and who holds a
7 senior role in that organisation as a deputy director.
8 That application is supported by open and closed
9 witness evidence about the individual's personal
10 circumstances and an open and closed damage assessment. 14:02
11 Sir, we do recognise that in respect of that
12 application a lot of the detail can only be dealt with
13 tomorrow in a closed setting.

14
15 So that's all we propose to say save to set out the 14:03
16 order in which to invite submissions on the issue of
17 anonymity, which is this;

18 First, Mr Henry, on behalf of PSNI.

19 Second, Ms Fee, on behalf of HMG.

20 Third, Mr Southey, on behalf of the families that he 14:03
21 represents.

22 Fourth, Mr Toal, to the extent that he wishes to add
23 anything on behalf of those that he represents.

24 Following the family submissions it seemed to us that
25 it would be fair to permit counsel for PSNI and HMG to 14:03
26 make any short responses strictly in reply and then,
27 finally, we may make some short submissions of our own,
28 although we currently judge that to be unlikely.

29

1 So what I am told it is not necessary for counsel to
2 leave their seats in order to make their submissions
3 but can I indicate that the microphone for each
4 advocate who is to speak should be switched on and I'm
5 sorry to ask but could Mr Henry, first of all, put his 14:04
6 hand in the air or indicate his position so that those
7 who operate the microphones can see where he is.
8 MR. GREANEY: Sir, that's all we propose to say.
9 CHAIRPERSON: Thank you Mr. Greaney.
10 Mr. Henry. 14:04
11
12
13
14 SUBMISSION BY MR. HENRY:
15 14:04
16 MR. HENRY: Good afternoon, my Lord. Mr. Greaney has
17 helpfully indicated that there is no requirement for
18 counsel to leave their seats but just out of the force
19 of habit I wonder if I might be permitted the
20 indulgence to stand whilst making my submissions? 14:05
21 CHAIRPERSON: Of course.
22 MR. HENRY: Your Lordship can hear me okay?
23 CHAIRPERSON: You are just a touch soft.
24 MR. HENRY: I will bear that in mind, my Lord. My Lord,
25 as you have heard helpfully from Mr. Greaney already, 14:05
26 there are five sample applications before you today, on
27 behalf of the PSNI. They all relate to former police
28 officers both with the RUC and the PSNI.
29

1 You will have seen from the table summarising the
2 applications that two of those former officers were
3 Special Branch officers and three of the five were CID
4 officers and, as has also helpfully been indicated by
5 Mr. Greaney, you have two sources of evidence from each 14:05
6 of them which contains individual particulars about
7 their applications or in support of their applications.
8 The first is the open statement. The second is the
9 closed statement. There are then two categories of
10 general evidence, if I may describe it in those terms, 14:06
11 in broad support of all of those applications and they
12 are, first of all, the JTAC assessment, which
13 Mr. Greaney has already made reference to and further
14 the bundle of open source materials which was supplied
15 along with those applications by the PSNI. 14:06

16
17 So I'll come to that evidence in due course, my Lord,
18 but one of the opening observations that we would make
19 at this stage and repeat from our written submissions
20 is that whilst the bulk of the task which the Inquiry 14:06
21 has in front of it is a retrospective examination of
22 events which have already taken place, this exercise is
23 different. It's a predictive exercise, predictive in
24 difficult circumstances. That poses challenges for the
25 decision-maker, my Lord, and arising out of those 14:07
26 challenges in the Northern Ireland context in
27 particular we have arrived at the precautionary
28 principle which is something which myself and no doubt
29 Ms Fee will address you on in due course as well.

1 But just to assist your Lordship from the outset, my
2 submissions will cover the following main topics.
3 Firstly, Article 2 and the test over which there
4 doesn't appear to be any controversy.
5 Secondly, the evidence that we rely on in support of 14:07
6 the applications.
7 Thirdly, I am going to touch a little further on the
8 issue of Northern Ireland context for making this kind
9 of application and its impact on this kind of
10 application. I'll then turn to the common law test and 14:07
11 then, finally, touch briefly upon some of the
12 submissions which have been contained within or set out
13 in the Fox Law submissions.
14
15 So, my Lord, in relation to the first of those issues, 14:08
16 Article 2, everyone is agreed that we are dealing with
17 the operational duty or a limb of the operational duty
18 arising from the significant case of Osman v the UK.
19 And if Article 2 is engaged, insofar as that
20 operational duty sets out, then the duty which arises 14:08
21 for the decision-maker is to take reasonable steps,
22 those reasonable steps are judged in the circumstances
23 of the application and that's again something which
24 I'll come to in due course. But the first question for
25 this Inquiry to decide is; is Article 2 engaged? 14:09
26 Relatively straightforward test now, following on from
27 the decision of Re Officer L.
28
29 The Inquiry will have to decide whether there is a real

1 and immediate risk. A real risk in these circumstances
2 is one which is more than trivial or fanciful. And as
3 has been observed in the Inquiry Legal Team note on
4 legal principles already, that's a relatively modest
5 threshold.

14:09

6
7 The second component of that first part of the test is
8 whether the risk is immediate and by "immediate" what
9 is meant is whether the risk is present and continuing.
10 Secondly then in the context of an anonymity
11 application about giving evidence to the Inquiry, the
12 Inquiry has to decide whether the giving of that
13 evidence either creates or materially increases the
14 risk. Again an uncontroversial statement of principle
15 arising out of Officer L case.

14:10

14:10

16
17 And thirdly and finally, insofar as general principles
18 are concerned for whether Article 2 is engaged, is the
19 nature of the risk and the nature of the risk must be
20 loss of life or death.

14:10

21
22 Now with that in mind, my Lord, I was going to just
23 before turning to the evidence, I was going to quote
24 from paragraph three of the Officer L decision. There
25 is no need to do that, Mr. Greaney has helpfully read
26 that out aloud to you and to those present.

14:10

27
28 So with that in mind, I am going to move on to touching
29 upon the evidence, my Lord, and I am going to begin

1 with the hearing bundle and then after that I'll move
2 to the open source bundle.

3
4 So beginning with the hearing bundle I am going to ask
5 that the Court turns up page 158, please. And whilst 14:11
6 your Lordship is turning that up, what I am inviting
7 you to consider here is the open statement from the
8 first of the five officers who are making applications.
9 This is officer No.1. And I would respectfully invite
10 your Lordship's attention to paragraphs four and five 14:11
11 to begin with, please, on page 158. You will see, my
12 Lord, that under the subtitle "threats both general and
13 specific", beginning of paragraph 4:

14
15 "The threats and risks to my life I experienced in the 14:12
16 early part of my police service had a very serious and
17 demoralising effect on myself and my staff, which
18 consisted on a very small team."

19
20 And we know that Officer No. 1 was one of two Special 14:12
21 Branch officers making the application.

22 At paragraph 5 he continues:

23
24 "A direct and serious threat to my life arose later in
25 my career from North Armagh Provisional IRA and 14:12
26 resulted in significant protection measures having to
27 be taken, which remain to this day."

28
29 Just pausing there for a moment, my Lord, you have five

1 different officers with five different statements
2 setting out five different sets of individual
3 circumstances. Respectfully I am not going to take the
4 Inquiry through all five of those today but they do set
5 out a consistent theme of the officers having 14:13
6 experienced personal difficulties with their security
7 as a result of their service as a police officer.
8 So this officer has described the threats and
9 difficulties that he faced at paragraphs four and five.
10 At six and seven he moves on to talk about the type of 14:13
11 effect that that had on him. At paragraph six he says:

12
13 "As consequence of my sensitive role I have always kept
14 a low profile, avoiding publicity and staying below the
15 radar. I have practically no social life outside close 14:13
16 friends and this has had a huge impact and detrimental
17 effect on my family, which they remind me of to this
18 day."

19
20 Touching, my Lord, on the personal impact and something 14:14
21 which will be more relevant to the subjective fears
22 that we will discuss in due course whenever we come to
23 talk about the common law test. Below paragraph six
24 the officer sets out the observations about the
25 attempted murder of Detective Chief Inspector Caldwell 14:14
26 and also the targeting of some retired officers by
27 Damian Duffy and Shea Reynolds for which they were
28 convicted in July 2025.
29

1 Further, at paragraph seven, this officer describes:

2
3 "I have maintained a high security blanket since my
4 retirement as I wish to avoid publicly confirming my
5 former role, my identity and that I remain part of the 14:14
6 community in Northern Ireland. This has become the
7 norm in my lifestyle. I wish to live without having
8 the fear of my identity being made public to the extent
9 it will lead to the resumption of terrorist targeting."

10
11 And then after that, my Lord, it goes on to talk about
12 the stress that this has placed on him and his family.
13 That gives the Inquiry some insight, a snapshot into
14 what the individual officer has experienced and the
15 effect that it has had on him and his loved ones. 14:15

16
17 I am now respectfully going to ask that the Inquiry
18 switch to a different bundle and look at the open
19 source materials, that's the bundle consisting of some
20 400 pages. 14:15

21 CHAIRPERSON: I think I have got these in two
22 collections, Mr. Henry, is that the same way that you
23 have them?

24 MR. HENRY: In my collection, my Lord, I have a single
25 collection divided by tabs for one through to 45, page 14:16
26 numbers beginning at one through to 415.

27 CHAIRPERSON: Yes.

28 MR. HENRY: And it's that bundle 1 to 415 that I would
29 like to focus on now.

1 CHAIRPERSON: Just bear with me a second. I have got
2 bundle A running from pages 1 to 217 and bundle B
3 running from 1 to 207. Bundle B commencing at tab 26.
4 MR. HENRY: It may be that -- may I ask what the first
5 page of bundle B is please, my Lord? It may be that 14:16
6 there is...
7 CHAIRPERSON: It begins the numbering sequence again at
8 page 1. would it help if I used hard copy?
9 MR. GREANEY: May be if we have a hard copy. I have
10 the same two bundles as the Chairman, Mr. Henry. My 14:17
11 first bundle runs from page 1 to page 217 and tab 1 to
12 tab 25 and my bundle 2 runs from tab 26 page 218. Sir,
13 do you not have in your second bundle page numbering in
14 the bottom right-hand corner?
15 CHAIRPERSON: I do, yes. It begins at page 218. 14:17
16 MR. GREANEY: Yes.
17 MR. HENRY: And at tab 26, my Lord, on page 218.
18 CHAIRPERSON: Yes. If we use those numbers then I'll
19 be able to follow on screen.
20 MR. HENRY: That's very helpful my Lord, thank you. So 14:18
21 unfortunately, my Lord, I am going to go backwards and
22 forwards a little bit through this bundle in an attempt
23 to take you through the entries in a chronological
24 order such as they arose at the time rather than where
25 they appear in the bundle. So with that in mind I am 14:18
26 going to ask you to first turn up page No.345 please. I
27 beg your pardon, just with the new adjustments, my
28 Lord, I think that will be page No.343. Inquiry No.
29 page 343.

1 what your Lordship should be looking at is a news
2 article from the BBC. It begins on the previous page,
3 342 and the title states "Constable Carroll Murder".

4 CHAIRPERSON: Yes, I have that.

5 MR. HENRY: So, my Lord, if you look at the beginning of 14:19
6 page 343 you'll see that it reads in this open source
7 document.

8
9 "Constable Stephen Carroll was murdered in March 2009
10 during a surge in dissident Republican activity. Just 14:19
11 two days before the officer was shot dead two soldiers
12 on duty at Massereene barracks in Antrim, Northern
13 Ireland, were killed by the Real IRA but it was the
14 Continuity IRA which claimed responsibility for the
15 death of the police officer." 14:19

16
17 So pausing there for a moment, my Lord, we have two
18 fatal shootings in close proximity to one another from
19 two different dissident Republican groupings both in
20 2009. And further on down that page, my Lord, you'll 14:20
21 see, I beg your pardon, four paragraphs from the bottom
22 that:

23
24 "The deceased, Constable Carroll was a husband, father
25 and grandfather." 14:20

26
27 And in the following paragraph you'll see that he was
28 starting to talk about retirement. This was a
29 Constable who was in long service coming towards the

1 end of his policing career. And over the page, at the
2 top of 344, you'll see the officer had only
3 one-and-a-half years of service left.
4

5 Now, my Lord, just bear with me one moment until I get 14:20
6 you the correct page number. Page 312 and 313 next,
7 please. What we are going to talk to you about here in
8 terms of this article is a young former police officer,
9 Peadar Heffron, who was seriously injured in 2010. So
10 moving forward a year from the last incident. And 14:21
11 hopefully what your Lordship should have on page 312 is
12 the beginning of BBC article, which references the
13 former officer's name and that he was injured.
14

15 If I may take you then to the top of the next page, 14:21
16 313, it provides some details:
17

18 "A former PSNI officer injured by a dissident
19 republican bomb 14 years ago has said knowing what he
20 knows now he would not have joined the police." 14:22
21

22 It goes on to talk about him being in a wheelchair.
23 The fourth paragraph down you will see his serious
24 injuries as described, his leg was amputated as a
25 result of the bomb exploding underneath his car. And 14:22
26 in the next paragraph below that, you will see that it
27 was in County Antrim in 2010.
28

29 Now just over the page then, my Lord, at 314, you will

1 see some further details that Mr. Heffron was
2 travelling in the car on his own. It was disputed
3 initially that he would travel with his wife on his way
4 to work, he left his home and was travelling to work
5 when the bomb exploded underneath his car, 14:22
6 approximately half a mile from setting off. He goes
7 through, later in this article, to talk about the steps
8 that he took on the day and also you'll see, on the
9 next page, 315, that he had previously been the subject
10 of some threats which were the cause of a move back to 14:23
11 a different area of Northern Ireland in which to
12 discharge his Constable duties. So this is a young
13 Constable in 2010 who was the subject of an
14 assassination attempt using a car bomb.

15
16 Now I am going to ask my Lord that you turn to page
17 359, please. And my Lord what you should hopefully
18 have in front of you is another BBC open source
19 article, title of which refers to Ronan Kerr. And if I
20 may ask then that you turn over the page to 360. The 14:24
21 article begins:

22
23 "The PSNI said it believes there are witnesses in the
24 community who may hold the key to vital evidence."

25
26 Then it goes on to talk about Constable Kerr himself. 14:24
27

28 "Constable Kerr, 25, died in a booby-trap car bomb in
29 Omagh, Co. Tyrone, on the 2nd of April 2011."

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

And as you read through the article later, my Lord, you will see further details about him joining the police in 2010 and that the explosion was, a car bomb had been placed under his car outside his home. And in the final two paragraphs my Lord, at page 360, if I could just direct your attention towards those momentarily, please, you will see reference to Detective Chief Inspector John Caldwell as being the investigating officer, the leading investigating officer, and we will return to his name in due course in these submissions.

My Lord if you would next then turn to page 322 and 323 please. Thank you my Lord. You will see the title of this BBC article refers to David Black. He was a prison officer. If I may direct your attention towards the top of the second page at 323, the article begins:

"Mr. Black was driving to work at Maghaberry Prison when shots were fired at him from inside a passing car on the M1 in County Armagh on the 1st of November 2012."

So here we have, my Lord, a sequence of incidents beginning with Constable Carroll, going on to Constable Heffron, going on to Constable Kerr and now moving away from the police officer but to another civil servant, a prison officer who was targeted by dissident

1 republicans as a result of his employment.

2 You will see in the open source materials, my Lord, I
3 won't take you to a specific page reference just at the
4 moment, but reference to a second prison officer, David
5 Ismay, who was again sadly killed as a result of a bomb 14:27
6 which was placed under his vehicle on his way to work.
7 That was in 2016.

8 CHAIRPERSON: what was the year, sorry?

9 MR. HENRY: 2016. And, my Lord, may I next invite you
10 to go forward then in the bundle to pages 384 and 385, 14:28
11 please. And again you will see another BBC article, my
12 Lord, the title is on 384 as:

13
14 "PSNI murder plot discussion recorded by MI 5."

15
16 The beginning of the article then on page 385 states: 14:28

17
18 "An undercover MI 5 agent has told the court of how
19 recordings were made of three men allegedly discussing
20 a failed murder attempt on police." 14:29

21
22 Now you have the accused's names in the next paragraph,
23 then after that some detail about the actual attempt
24 itself. It says:

25
26 "They face a range of terrorist-related offences
27 connected to a gun attack on the PSNI in 2013. All
28 three men deny preparing directing terrorism and being
29 in the IRA. Mr. Fitzsimmons and Mr. McGrory also deny 14:29

1 attempting to murder police and possession of two AK47
2 assault rifles and ammunition with intent to endanger
3 life. The charges relate to a gun attack on a police
4 convoy in the Crumlin Road area of Belfast on the 5th
5 December 2013. "

14:29

6
7 I am going to ask my Lord that you next turn to the
8 first part of the open source materials, I think bundle
9 A for you and it's a document entitled:

10
11 "Report of the independent reviewer," and it has a page
12 No.71.

14:30

13 CHAIRPERSON: Yes.

14 MR. HENRY: And my Lord on that title page you'll see
15 the following detail, it's the independent reviewer's
16 10th report covering a period August 2016 through to
17 July 2017 and the date of the report itself is April
18 2018. It's quite a substantial document but if I may
19 invite your attention respectfully to internal page
20 No.6, Inquiry page No. 82 and paragraphs 4.1 through to
21 4.3.

14:30

14:31

22 MR. GREANEY: Just in that short interlude, could I
23 indicate that there is a Spanish translation that is
24 taking place for reasons that everyone will understand
25 and we have had a message from the Spanish translator
26 asking if Mr. Henry could speak just a little more
27 slowly. So, it's not the volume, it's just speed.
28 Thank you.

14:31

29 CHAIRPERSON: So we were at paragraphs 4.4 and 4.5,

1 Mr. Henry.

2 MR. HENRY: Yes, thank you my Lord. The title of
3 Chapter 4 is: "Security and Public Order" and then the
4 subtitle immediately below that is "Security". The
5 only detail I would like to draw out of paragraph 4.1 14:32
6 are the reference to the four different dissident
7 republican groups in the first sentence. They, as
8 posing the threat.
9

10 Moving down to paragraph 4.2: 14:32
11
12 "These groups have continued to target and attack
13 police officers, prison officers and members of the
14 armed forces."
15 14:33

16 And then the next series of sentences, my Lord, deal
17 with the general threat assessment at that time. If I
18 may then invite your attention down to paragraph 43,
19 please. I am afraid the print quality is rather poor,
20 my Lord, but it reads that: 14:33
21

22 "During the report period..." So August 16 to July 17.
23

24 "... there were six national security attacks carried
25 out by dissident republicans. They involved a range of 14:33
26 different methods."
27

28 And then in the sub-paragraphs A through to D, we have
29 a description of the type of attacks. So the first of

1 those at: "A. August 2018, pipe bombs were thrown at
2 PSNI." And it refers to that taking place in both
3 "Derry/Londonderry and Belfast".
4

5 At "B" it goes on to refer to: "January 2017. A 14:34
6 police officer was shot and seriously injured in a
7 shooting at a petrol station in the Crumlin Road area
8 of North Belfast, when up to 10 rounds from a military
9 assault rifle were fired at him."
10

11 "C", the top of the next page, deals with February 14:34
12 2017, and it refers to:
13

14 "A PSNI officer on his way to work narrowly having
15 escaped serious injury when an improvised explosive 14:34
16 device, which had been placed under his vehicle, failed
17 to function as he drove off. The device exploded
18 during the subsequent clearance operation but there
19 were no injuries."
20

21 Below that at "D": 14:35
22

23 "In March 2017, dissident republicans in Strabane
24 detonated a roadside device in a residential area as a
25 PSNI vehicle was passing."
26 14:35

27 So my Lord, that gives us a flavour, whilst we are not
28 describing every incident, that gives us a flavour of
29 the period from 2009 through to 2017.

1 I am now going to turn to 2019, if I may, going back to
2 part B of the bundle and page No.368 and 369.

3 CHAIRPERSON: I have that. Thank you.

4 MR. HENRY: Thank you my Lord. Again what you're
5 looking at is a BBC online article. You will see the 14:36
6 date of the article is the 22nd of October 2021 but the
7 date of incident that is referred to within the article
8 is June 2019. And if I may invite your attention then
9 to the top of 369 and the second paragraph you will
10 see: 14:36

11
12 "A viable device was discovered by an off duty officer
13 at Shandon Park Golf Club in East Belfast on the 1st of
14 June the 1st 2019."

15 14:37
16 It goes on to describe Peter Granaghan of Belleek as
17 being charged with the attempted murder of the serving
18 police officer. It gives further details about the
19 suspect and in the sixth paragraph you will see, the
20 article reads: 14:37

21
22 "The police officer noticed the device attached to the
23 underside of his vehicle when he returned from a round
24 of golf." 14:37

25
26 And that's something that I am going to respectfully
27 invite the Inquiry to consider in due course that as a
28 result of these kinds of threats, the reality for both
29 the serving officers and the former officers is that

1 they have a very different security protocol. They are
2 routinely checking underneath their cars. They are
3 vigilant about the members of the public who are around
4 them at all times. They are careful about their
5 personal information. They are careful about who knows 14:37
6 their name, who knows where they live, who knows who
7 their family are and so forth and very conscious to
8 protect that they are or were serving police officers.

9 CHAIRPERSON: You mean very different from members of
10 the public? 14:38

11 MR. HENRY: That's correct. It's a different situation
12 for them and also a different mindset. So a member of
13 the public, thankfully, doesn't have to operate in that
14 same kind of security conscious world as a serving or
15 former police officer. 14:38

16
17 Next, my Lord, I am going to respectfully invite you to
18 turn to page No.191. I beg your pardon my Lord, at
19 page 190. The title of the document that you are
20 looking for is: 14:39

21
22 "Dissident Republican attacks and attempted attacks in
23 2021."

24
25 CHAIRPERSON: Yes. 14:39

26 MR. HENRY: You have those attacks as summarised in a
27 table below the title my Lord. The first attack was on
28 16th of March. You will see on the third column the
29 location described as "Enniskeen". The third column

1 "attempted shooting attack" and in the fourth column:

2
3 "Report of shots being fired at PSNI, Enniskillen, as
4 well as deployment of an improvised explosive device.
5 No improvised explosive device was located and an 14:39
6 improvised firearm was located which was assessed to
7 have been used to fire a shot and thankfully no
8 casualties reported as a result."

9
10 So that's the first of the two incidents. 14:40

11
12 Secondly then, the date was the 9th of April, the
13 location was Dungiven, the type of incident was an IED
14 attack at the home of a police officer. You will see in
15 the description summary: 14:40

16
17 "A crude improvised explosive device had been deployed
18 to the rear of an off-duty police officer's vehicle in
19 Dungiven and thankfully it failed to function as
20 intended." 14:40

21
22 If your Lordship would then scroll down a couple of
23 pages to the summary section for 2022, you will see a
24 similar table. It contains one incident. The date
25 being the 15th of August. The location is described as 14:41
26 "Londonderry". The incident type, a shooting at
27 police. And then you will see in the final column:

28
29 "The New IRA fired seven shots at police close to an

1 anti-internment bonfire in the Creggan area of Derry
2 City. "

3
4 That's 2022 my Lord. Coming forward then to 2023. May
5 I ask that you turn up page 393 please. 14:41

6 CHAIRPERSON: I have that, thank you.

7 MR. HENRY: The title of this BBC article:

8
9 "Dissident republican group warns PSNI families are
10 targets." 14:42

11
12 The date of the article itself is 9th of March 2023.
13 The body of the article reads:

14
15 "A dissident republican group has warned that relatives 14:42
16 of Northern Ireland police officers are considered
17 targets."

18
19 You will see that threat was made in a statement to the
20 Irish News. The group responsible is referred to as 14:42
21 ANP and in the fourth paragraph of that page, my Lord,
22 you will see:

23
24 "ANP is a small group that was behind an attempted boom
25 attack outside the police station in Londonderry last 14:42
26 November."

27
28 so the previous year, 2022.
29

1 You may also, my Lord, have seen reference to the bomb
2 attack on the Bishop Street courthouse in January 2019,
3 again in Derry City.

4
5 My Lord, if I just before I turn back to the other 14:43
6 bundle, if I might take you to one further entry, a
7 little further towards the back beginning on page 409.
8 And you will see again a BBC article, my Lord, the
9 title of which is:

10
11 "Man admits recording vehicles at police station." 14:43
12

13 The date of the article is 16th September 2024. The
14 body of the article reads:

15
16 "A 33 year-old man has admitted recording details of 14:43
17 vehicles parked within Lurgan Police Station on his
18 mobile phone."
19

20 And this is a detail, my Lord, I hadn't drawn out in 14:44
21 detail in the previous entries but you will see the
22 defence lawyer's name in the final paragraph on that
23 page. You will not see the prosecutor's name, and that
24 is not an unusual situation for that kind of reporting
25 within this jurisdiction. Something I will return to 14:44
26 in due course.

27 CHAIRPERSON: So that's a commonly reflected feature of
28 courtroom news reporting, is it?

29 MR. HENRY: It is, my Lord, but only in respect of

1 terrorist offending. It's perfectly normal to see a
2 prosecutor's name published in a news article for a
3 non-terrorist offence.

4 CHAIRPERSON: Sorry, Mr. Henry, the point you are
5 making is that contrasts with what one would find in 14:45
6 other reports in the United Kingdom?

7 MR. HENRY: Indeed, my Lord. It was a point I was going
8 to come to within my skeleton argument and perhaps we
9 can deal with it now. The types of security

10 arrangements which are the norm in this jurisdiction do 14:45
11 not, are not replicated in other parts of the United
12 Kingdom or indeed in the South of Ireland. Take, for

13 instance our judiciary, they are routinely flanked by
14 two armed body guards and transported accordingly in a
15 protected vehicle. Other high ranking officials within 14:45

16 the criminal justice system and in the public sector,
17 again are assessed as requiring those kinds of security
18 arrangements, those kinds of precautions. That

19 distinguishes this jurisdiction and the security
20 arrangements which are the norm and are required, 14:46
21 assessed as required, from other parts of the United

22 Kingdom.

23
24 So my Lord, may I ask you, before we leave this article
25 just to look at the next page, page 410. You will see 14:46
26 in the second paragraph that the accused pleaded guilty

27 and below the sub title "CCTV Footage" it reads:

28
29 "He was further charged..."

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

This being the accused.

"... that on the same date he published information about two people who are or have been members of his Majesty's forces, namely vehicle details of two individuals who are members of the Police Service of Northern Ireland which was likely to be useful to a terrorist."

14:46

14:47

So here we have someone proactively seeking information in and around a police station, vehicle registration details, recording them and then publishing those details in such a way that they would be useful to terrorists.

14:47

My Lord, I wonder then if I might ask you to go back to the hearing or trial bundle please and I'll round off reference now to the open source material, just by reference to a couple of further news articles. At page 189 and 190 to begin with. And what your Lordship should hopefully have in front of you is BBC article which has the title:

14:47

"Omagh Police Attack: John Caldwell has suffered life-changing injuries."

14:48

CHAIRPERSON: Sorry Mr. Henry, I am looking in the wrong bundle.

1 MR. HENRY: That's quite all right, my Lord.
2 CHAIRPERSON: Yes, I have it. Thank you.
3 MR. HENRY: Thank you, my Lord. So this is the officer
4 that I mentioned as the investigating officer in one of
5 the previous newspaper articles or online articles that 14:49
6 we've gone through. Detective Chief Inspector John
7 Caldwell, as he was during the course of his service,
8 operated in an MIT or Major Investigation Team and was
9 the lead officer in many investigations into terrorist
10 offences. 14:49
11
12 with that in mind or that context in mind, my Lord, I
13 would invite you to look at the top of the second page,
14 190, where it reads:
15 14:49
16 "Detective Chief Inspector John Caldwell was shot by
17 two gunmen after coaching children at football on
18 Wednesday. Police said he was with his son putting
19 balls into the boot of his car when he was shot at
20 20:00 hours." 14:50
21
22 Mercifully, my Lord, Mr Caldwell survived his injuries.
23 It goes on down through the article to describe him as
24 being in a critical but stable condition at that stage
25 and he had to retire from service shortly thereafter as 14:50
26 a result of those injuries.
27
28 So, pausing there for a moment, my Lord, from the open
29 source materials that you have seen so far you have

1 quite young Constables, starting at the beginning of
2 their career, who have been targeted in assassination
3 attempts. You have senior officers right at the top of
4 the Major Investigation Team being targeted in
5 assassination attempts. It is self-evident from the 14:51
6 short description of those attacks that they were
7 planned attacks, that information had been gained and
8 gathered perhaps systematically in relation to the
9 targets of those attacks.

10
11 There was no discrimination between the particular role
12 that the officer played or the seniority of the
13 officer. So, my Lord, just remaining with Detective
14 Chief Inspector Caldwell at the moment, if I can ask
15 you to go to page 167 and 168 of the bundle and the 14:51
16 title of this BBC article:

17
18 "Controversial bonfires are lit in Londonderry admit
19 criticism."

20
21 And I would ask your Lordship just to note the date
22 below the image of the bonfire on the first page,
23 that's the 15th of August 2025. So this is
24 approximately two years after Detective Chief Inspector
25 Caldwell has been shot and seriously injured and he has 14:52
26 retired. And as you read through the article you will
27 see reference to both a serving officer's name and also
28 John Caldwell's name appearing, painted onto a pallet
29 placed on the side of the bonfire before it was set

1 alight.

2
3 If your Lordship looks overleaf at page 169, you will
4 see an image of what appeared on the side of the
5 bonfire. You will see John Caldwell's name, which was 14:52
6 previously known. A serving officer's name has
7 obviously been blurred out below that and you will see
8 the rather menacing crosshairs of the target beside
9 those names.

10
11 So my Lord that's a threat that exists to Mr. Caldwell 14:53
12 some period of time after he has already been shot and
13 after he has retired and also for that serving officer
14 whose name is pixilated.

15
16 The last open source item that I am going to ask you to 14:53
17 look at is an article on page 173 and 174, again in the
18 same bundle: if I can orientate you through this, my
19 Lord, on the first page you will see the date of the
20 article, the 4th of July 2025, just above the image of 14:54
21 the wildlife camera. What you are about to read is two
22 dissident republicans who had placed, secreted a
23 wildlife camera in the driveway of a retired police
24 officer with a view to gaining information about his
25 pattern of life on which to mount an assassination 14:54
26 attempt.

27
28 So just to bring you through some of the core detail of
29 this article, my Lord, below the image you will see it

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

reads:

"Two men were found guilty today of terrorist offences including targeting a retired police officer."

14:55

That's the first paragraph. The third paragraph gives the names of the defendants, Damian Duffy and Shea Reynolds, and that they were convicted of six joint offences committed over a time frame, 3rd to the 21st September 2016.

14:55

"They were convicted of offences of preparation of terrorist acts, two counts of possessing articles for use in terrorism and two counts of attempting to collect or make records of information likely to be useful to a person committing or preparing an act of terrorism."

14:55

The paragraph below that you will see reference to the wildlife camera that the two of them secreted in the hedge of the driveway. You will see reference to the driveway in the next paragraph at the top of page 174. It reads:

14:56

"It was then deployed in the driveway of a home of a retired police officer referred to by the judge as Mr X."

14:56

And, my Lord, I made the observation in relation to a

1 description of the prosecutor versus the description of
2 the defence barrister in relation to one of the
3 previous articles. You will see that borne out in this
4 Belfast Live article, in the penultimate paragraph of
5 the second page, that's page 174. I beg your pardon, 14:56
6 the third and second last paragraphs.

7
8 So, my Lord, just before I turn to the JTAC assessment
9 document, I am respectfully going to make some
10 observations in relation to that material. First of 14:57
11 all we know from the Article 2 test that it must be a
12 risk of death, otherwise Article 2 cannot be engaged.

13 You can see readily from the open source materials that
14 I have rehearsed to you, they are all shooting and bomb
15 attacks or preparation for such attacks. So the 14:57

16 consequence, if successful and tragically they were
17 successful on a number of occasions, is the loss of
18 life. So we know that we're dealing with a risk of
19 loss of life. It didn't matter whether the officer was
20 on duty or off duty. It doesn't matter whether the 14:58

21 officer is serving or retired. It doesn't matter
22 whether the officer is young or old. It doesn't matter
23 which role within the police service in which the
24 officer discharges their duties. They are all
25 potential targets of shooting or car bomb attacks. 14:58

26 And what we respectfully suggest to the Inquiry, on the
27 basis of that material, is before we come to the JTAC
28 assessment there is obviously a real risk to the lives
29 of both serving and former police officers. The reason

1 that I have gone somewhat laboriously through the
2 chronology, my Lord, in Terms of Reference year by
3 year, is to illustrate to this Inquiry that it is both
4 an historic threat with reference back to the 300
5 deaths described by Lord Carswell in Re Officer L, 14:59
6 right through from the period of time beginning 2009 to
7 2025 that I've just taken you through. It's a threat
8 which has existed throughout that entire period and
9 continues to exist. And, my Lord, just in case the
10 court has any reservations on reliance on those kind of 14:59
11 open source materials, I am going to ask that you turn
12 up page 114 of the hearing bundle please. And what I
13 am going to take you to is a portion of the PSNI's
14 written submission and, in particular, paragraph 72.
15 Page 114, paragraph 72. And the reason I have taken 15:00
16 you to this, is below that paragraph you will see a
17 quotation from the Ballymurphy Inquest decision of
18 Mrs. Justice Keegan, as she was then, now our Lady
19 Chief Justice. And this was made in the context of the
20 anonymity applications by the former police officers 15:00
21 and soldiers in that Inquest. So if your Lordship has
22 that available to you, at paragraph 23 of Mrs. Justice
23 Keegan's findings stated as follows:

24
25 "Of course the present evidence relates to an ongoing 15:00
26 dissident threat that has been evidenced by a number of
27 incidents in Northern Ireland and I was provided with
28 press briefings in which that threat was very
29 definitely described as real, continuing and present.

1 So it was clear that Article 2 is engaged in these
2 cases in addition there are common law powers to
3 protect witnesses where appropriate which I utilise
4 particularly when dealing with medical probability."

15:01

5
6 The point I am respectfully making to the Inquiry is
7 this, on the open source materials alone the Article 2
8 test of real and immediate threat or risk to both loss
9 of life is made out. I respectfully now turn to the
10 JTAC assessment, Mr. Greaney has already touched upon
11 this.

15:01

12 MR. GREANEY: I wonder if I could interrupt, Mr. Henry,
13 for a moment. So, as we did this morning we will need
14 a short break so the stenographer can have a rest. So
15 could we break now, if that suits Mr. Henry as I think
16 it will, for 15 minutes?

15:01

17
18
19
20 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS:

15:02

21
22
23 CHAIRPERSON: Mr. Greaney.

24 MR. GREANEY: Bearing in mind the submissions that you
25 still have to hear on this important issue, it's plain
26 that we will not conclude the hearing by a reasonable
27 time this evening, we know that you will be very keen
28 that no-one should feel rushed in the submissions that
29 they make, and it seems to us in the circumstances that

15:28

1 bearing in mind that we all have to come back tomorrow
2 to conclude this hearing now, the sensible point at
3 which to stop, the sensible point at which to stop is
4 once you have heard from Ms. Fee. So, you will have
5 heard from the state Core Participants and we will 15:28
6 start tomorrow morning with the submissions on behalf
7 of the family Core Participants who have lodged written
8 submissions, subject to your better view, sir.

9 CHAIRPERSON: well, I see the sense of that suggestion
10 Mr. Greaney, but let's just leave it open until we see 15:29
11 what time it actually is.

12 MR. GREANEY: Of course, I see the sense in that.
13 Thank you.

14 CHAIRPERSON: Mr. Henry. All right, Mr. Henry, thank
15 you for your patience. Would you mind just commencing 15:30
16 your submissions again?

17 MR. HENRY: Thank you, my Lord. I am taking you to the
18 JTAC assessment, I won't open a separate document to
19 you but I will just flag up, at page 152, which is the
20 statement of the Detective Chief Superintendent of 15:31
21 intelligence branch in the PSNI who provides the
22 Inquiry with some background information about how
23 these assessments come to be compliant.

24
25 And just for the benefit of the Core Participants, I 15:31
26 know the Inquiry tomorrow or some subsequent day will
27 see the closed version of the JTAC assessment which
28 contains all of the formalities with such a document
29 that one would expect. What the CPs are seeing is the

1 extraction of open data or information which is capable
2 of being shared in open and simply put on to an A4
3 page. I know some of the Core Participants have made
4 the observations about the lack of signatures,
5 statements of truth and so forth in relation to the 15:32
6 assessments and I hope that goes some way to reassure
7 them that there is more formality to the closed version
8 and there is an explanation as to why they are seeing
9 it in this format.

10
11 So if I could ask that you look at the top of page 210
12 please. What you have here, my Lord, is the 15:32
13 overarching Northern Ireland related terrorism threat
14 level in Northern Ireland and it's currently assessed
15 as substantial and that translates to meaning that an 15:32
16 attack is likely or an attack is probable. One of the
17 things that I am going to ask the Inquiry to consider
18 in due course is the likely target of that attack or
19 attacks and it's going to become, if it hasn't already,
20 going to become quite plain that members of the 15:33
21 security forces including and perhaps, in particular,
22 police officers and former police officers are the
23 target or intended likely targets of those attacks.
24

25 So below that, my Lord, we see an intelligence summary 15:33
26 and incidents section. And it states:

27
28 "Dissident republican groups have never conducted an
29 attack against a witness in an Inquiry or Inquest in

1 Northern Ireland."

2
3 An obvious point to make in an assessment such as this
4 and one in which some of the Core Participants have
5 picked up on within their written submissions. One of 15:33
6 the respectful observations we make about that my Lord,
7 is whilst not every single application is granted, it
8 is not infrequent that members of the Security Services
9 and former members of the Security Services are granted
10 anonymity in Inquest and Inquiry proceedings in this 15:34
11 jurisdiction and, therefore, the absence of attacks
12 against those individuals, we say respectfully, is in
13 part due to the fact that they are frequently granted
14 anonymity.

15 CHAIRPERSON: Mr. Henry just sometimes you let your 15:34
16 voice drop a little. Can I encourage you, given the
17 distance we are apart.

18 MR. HENRY: Certainly, my Lord, I understand. So if I
19 may move onto the final sub category then of the JTAC
20 document. The title is: 15:34

21
22 "Dissident republican intent and capability."

23
24 And it begins by stating:

25
26 "If a witness, who is the former member of the RUC or 15:34
27 PSNI, has their identity made available in the public
28 domain, this will likely increase dissident republican
29 intent and capability to target that individual."

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

So we know so far in this conclusion section that the intent and capability of those who pose a threat to the former officers will increase if their identity is made known. Continuing with what it states in the assessment:

15:35

"Due to the extensive media coverage dissident republicans likely have an awareness of the Inquiry and there is a realistic possibility that dissident republicans will speculate on the identities of certain witnesses."

15:35

Another way of describing that is that there is a real possibility that they will attempt to identify those former police officers involved.

15:35

The assessment continues then:

"Dissident republicans have proven that when they are able to successfully identify an individual and obtain sufficient targeting information..."

15:36

Just pausing there to emphasise that it is not just the pattern of life type movements where the individual lives, what kind of car they drive, where they socialise, where they work, also their name which is useful to subversive elements in trying to tie together those details and perhaps research further in the

15:36

1 modern world of social media and lots of electronic
2 databases.

3
4 "So dissident republicans have proven that when they
5 are able to successfully identify an individual and 15:36
6 obtain sufficient targeting information, such as home
7 address, vehicle details or pattern of life..." POL.
8 "...they possess the capability to successfully
9 translate this into an attack."

10 15:37
11 And my Lord we respectfully refer back to the variety
12 of open source materials which make good that statement
13 within the assessment.

14
15 The penultimate paragraph reads: 15:37

16
17 "Dissident republicans highly likely view former
18 members of the RUC and PSNI and, therefore, former RUC
19 and PSNI witnesses at the Inquiry as legitimate targets
20 for attack." 15:37

21
22 So we lay emphasis on three elements, first of all it
23 is former RUC and PSNI officers. Secondly, they may be
24 seen as legitimate targets for an attack and the
25 Inquiry so far has heard multiple examples of such 15:37
26 attacks, sometimes fatal, thankfully other times not.
27 And the third observation we lay emphasis on here, is
28 that it is highly likely that those individuals would
29 be seen as legitimate targets. A high degree of

1 probability.

2
3 The final paragraph reads:

4
5 "Should any former RUC or PSNI witnesses at the Inquiry 15:38
6 be denied requested measures, such as anonymity and
7 screening, there is a realistic possibility that the
8 Northern Ireland related-terrorism threat to those
9 individuals will increase."

10
11 Just pausing there for a moment, that is a material 15:38
12 increase, we respectfully suggest my Lord, or rather
13 that is evidence of a material increase.

14
15 One could say that the threat is pre-existing, the test 15:38
16 is whether the giving of evidence creates the risk or
17 materially increases the risk. Here we have objective
18 evidence that there will be a material increase in risk
19 if the former officer gives evidence without anonymity.

20
21 And finally then the assessment concludes with: 15:39

22
23 "However, any increase in the level of threat is
24 dependent on the receipt and nature of any subsequent
25 intelligence." 15:39

26
27 And my Lord just before I move on to address some of
28 the queries that you raised, or Mr. Greaney raised,
29 from his helpful observations earlier, I am going to

1 invite the Inquiry to take the following submission
2 into account. There is an institutional competence
3 within this assessment. It has been undertaken by
4 those who have expertise in judging what the actual
5 threat is. And they have drawn on the appropriate 15:39
6 sources of information to make that assessment.
7 I made the observation earlier on that Inquiry may be
8 satisfied on the open materials alone that the
9 Article 2 test was met in relation to the officers. We
10 respectfully suggest to the Inquiry JTAC assessments 15:40
11 dispels any suggestion that the test could not or is
12 not met in the case of all five officers. An attack is
13 likely, they are the likely targets of such an attack.
14 The attack, if successful, will be fatal. And there is
15 a material increase in the risk to the retired officers 15:40
16 as a result of giving evidence to this Inquiry without
17 anonymity.

18
19 Now one of the queries raised was, this is a general
20 threat assessment covering all former or retired police 15:41
21 officers within Northern Ireland. It does not deal
22 with the individual, it does not deal with Officer 1,
23 2, 3, 5 or 7. And our respectful submissions in
24 response to that are as follows; firstly, it is by its
25 very nature a general assessment. It covers all five 15:41
26 of those officers as a result of them being former
27 officers. There is no requirement for an individual
28 assessment to arrive at the same conclusion in relation
29 to them. It is setting a base level or baseline

1 assessment in relation to former officers.

2 Some of those individuals or some of the officers may
3 be at high risk, some may be in comparison to one
4 another, some may be at lower risk in comparison to one
5 another but what we respectfully say is that, on the 15:42
6 basis of this JTAC assessment alone or coupled with the
7 open source materials, the test is met in respect of
8 them whether they are at the top end of the risk
9 spectrum or slightly lower down, but it's covering a
10 range of different officers. 15:42

11
12 The second observation I have to make in relation to
13 the suggestion of individual assessments is this; you
14 have the benefit of individual open and closed witness
15 statements from each of the officers who are setting 15:42
16 out both their personal experiences in relation to
17 their service and the security issues which have arisen
18 from that. And also the effects, perhaps more
19 pertinent to the common law tests but the effects that
20 fear has had on them and their lifestyles. So you are 15:42
21 not deprived of individualised evidence in respect of
22 each of the five sample applicants. You have an
23 overarching general threat assessment and then you have
24 individual detail about each of the five.

25
26 One of the other queries that was raised, my Lord, was
27 to deal with the issue of why or the significance
28 rather of some officers requesting anonymity and others
29 not at all and some requesting anonymity to the public 15:43

1 at large but not the Core Participants. So what we say
2 in relation to that, my Lord, is as follows; firstly,
3 it is a personal choice, on behalf of each of the
4 individuals involved, as to whether or not they ask for
5 anonymity and whether they ask for it against the 15:44
6 public at large and the Core Participants or only the
7 broader general public.

8
9 Their own personal decisions will be informed by their
10 circumstances. It may be informed by things such as 15:44
11 their profile, such as their own personal risk
12 tolerance or some other reasons specific to them or
13 combinations of reasons to them. Whatever the reasons
14 for their choices my Lord, we say respectfully they are
15 largely irrelevant. If the Article 2 test is met, and 15:44
16 they ask for anonymity, we respectfully say that they
17 are entitled to it. Some may chose not to but if the
18 test is satisfied and they apply, they are entitled to
19 it.

20 CHAIRPERSON: If the Article 2 test was met there would 15:45
21 be an obligation on me to take steps of some sort.
22 would I then be bound to shape those tests around the
23 individual preferences of the witness or might I, in
24 fact, conclude that the steps which ought reasonably be
25 taken were greater than they had suggested? 15:45

26 MR. HENRY: You would be so entitled my Lord.

27 CHAIRPERSON: Pardon?

28 MR. HENRY: You would be entitled to reach that
29 conclusion.

1 CHAIRPERSON: Because it's for me to assess what the
2 reasonable steps require to be.

3 MR. HENRY: I don't disagree at all with that my Lord.
4 One of the respectful submissions I am going to make to
5 you is this; when we come, and I appreciate that there 15:46
6 is some nuance to this which the court will wish to
7 address in relation to individuals in due course, when
8 we come to the decision of Mr Justice Humphreys in the
9 Coagh Inquest, he talks about the grant of anonymity as
10 being the minimum reasonable step in response to 15:46
11 Article 2 being engaged. We respectfully endorse that
12 approach to that test and we invite the Inquiry to
13 adopt it as well.

14 CHAIRPERSON: I think it's the same approach that
15 Mr. Justice Horner took in Jordan case as well. 15:46

16 MR. HENRY: Yes, and he was taking his lead from the
17 decision of Mr. Justice Carswell in Re Officer L as
18 well and interpreting his comments in paragraph 29 as
19 anonymity being the baseline as Mr. Justice Horner
20 described. 15:47

21
22 So, unless your Lordship has any further queries just
23 in relation to those discrete issues, what I am going
24 do now is move on to what we have referred to in the
25 written submission as the Northern Ireland context. I 15:47
26 have deliberately taken the Inquiry through the
27 evidential materials, first of all, in order to build
28 up for your benefit the factual background in which to
29 understand how the judicial review court, the Coroners

1 within this jurisdiction and, most importantly the
2 Court of Appeal, have arrived at their respectful
3 decisions in anonymity cases.

4
5 As you may have noticed from the written submissions 15:48
6 and authorities bundle, my Lord, there are a huge
7 number of anonymity decisions emanating from this
8 jurisdiction from all different types of cases. We
9 have attempted to summarise some of them in that table
10 which is annexed at the end of our written submission. 15:48
11 I don't intend to go through that with you, but it is
12 just to demonstrate quite how often this issue arises
13 within the Northern Ireland context and also quite how
14 often the anonymity applications are successful because
15 of the factual context in Northern Ireland and, in 15:48
16 particular, the security situation.

17
18 My Lord, I am next going to ask you to turn to my
19 written submissions, please, if you just bear with me
20 one moment. Page 127 of the hearing bundle. You will 15:48
21 forgive me, my Lord, if I touch upon some of the
22 territory that Mr. Greaney has helpfully outlined
23 already but I will do so in as brief a manner as I can.

24
25 So paragraph 114 of the written submission has a 15:49
26 subtitle above this, Northern Ireland context. We have
27 described this is an issue which has plainly exercised
28 the Court of Appeal in multiple different cases in
29 relation to the application of the Article 2 test when

1 former members of the Security Services, in particular
2 police officers who apply for anonymity.

3 what we have said in the second half of paragraph 114,
4 is that:

5
6
7 "Whilst it is imperative that each application is
8 considered on its particular facts, the two recent
9 judgments..."

10
11 This in reference to the Court of Appeal decision in C,
12 in 2012.

13
14 "...the two recent judgments made it clear that such
15 applications were likely to succeed as a result of the
16 security situation in Northern Ireland and the
17 particular risk placed by members and former members of
18 the security forces."

19
20 Over the page my Lord, what we touch upon, and this
21 resonates with the summary that Mr. Greaney gave
22 earlier. The security situation in Northern Ireland is
23 different to other parts of the UK. The laws that
24 applies is exactly the same. What changes is the
25 factual context. That's why we observe that in
26 practical terms what that results in are differences in
27 the security arrangements. So the security around
28 courtrooms, the security around judges, the security
29 around public officials, the security around high

1 ranking members of the criminal justice system and
2 indeed some prosecuting counsel as well.

3
4 we observe at the bottom of paragraph 115, my Lord,
5 that those types of security arrangements are not 15:51
6 commonplace, in fact largely non-existence in other
7 parts of the UK. It is because the security situation
8 here is different. The consequence of that in terms of
9 anonymity applications is that they are frequently
10 granted. 15:51

11
12 I am going to ask the Court to respectfully look down
13 at paragraph 117 of the written submissions where we
14 have quoted from Lord Justice Girvan's judgment in the
15 C decision, 2012. And Mr. Greaney has helpfully 15:52
16 identified this as a pertinent paragraph already. What
17 I would like to draw out with some emphasis, my Lord,
18 is in the latter half of that paragraph in the written
19 submissions you will see it highlighted in bold. After
20 talking about the threat to the general public from 15:52
21 dissident republican attacks, Mr Justice Girvan or Lord
22 Justice Girvan, went on to say:

23
24 "For some, such as members of the police force, the
25 level of threat has been and continues to be at a much 15:52
26 higher level and is much more immediate. It cannot be
27 considered as anything close to fanciful and it is
28 significant."
29

1 So in simple terms, my Lord, what the court is
2 conveying there is the real and immediate test is
3 satisfied. The Court goes on to say:

4
5 "The requirement to give evidence..."

15:53

6
7 CHAIRPERSON: Mr. Henry, can we just pause there for a
8 second. I am just slightly confused about something,
9 give me a moment.

10 MR. HENRY: Certainly.

15:53

11 CHAIRPERSON: The quotation from Lord Justice Girvan's
12 opinion which appears there, is said to come from
13 paragraph 43 of his decision. In the reports that I
14 have, it seems to come from paragraph 71.

15 MR. HENRY: If we have made an error my Lord, in our
16 drafting we apologise for that, perhaps that's
17 something I can address at the end of the submissions
18 and Mr. McCartan will assist me with that and make sure
19 we have given you the correct paragraph number at the
20 end.

15:54

15:54

21 CHAIRPERSON: Unless I am looking at a report in a
22 different publication than the one that you have quoted
23 from.

24 MR. HENRY: It may be that your Lordship is looking from
25 the Northern Ireland Law Reports rather than the
26 neutral citation judgment but it is something that we
27 can easily resolve.

15:54

28 CHAIRPERSON: Anyway, I have located the precise
29 comments in my copy that you are relying on.

1 MR. HENRY: Thank you. I apologise for any confusion
2 arising there.

3 CHAIRPERSON: No, it's perhaps me that's looking at a
4 different version of the opinion.

5 MR. HENRY: My Lord, I normally wouldn't take a court 15:54
6 or decision-maker through authorities within the body
7 of a written submission but the authorities bundle was
8 so substantial I thought it might just be easier.

9 CHAIRPERSON: Yes, it is.

10 MR. HENRY: So, my Lord, where I left off was at the 15:55
11 word "significant" five lines from the bottom of that
12 paragraph.

13 CHAIRPERSON: Yes.

14 MR. HENRY: Lord Justice Girvan as he was then
15 continued: 15:55

16
17 "The requirement to give evidence imposed on officers
18 involved in this Inquest will, according to the
19 evidence..."

20 15:55

21 So the assessments that were given in that case,
22 including a general threat assessment.

23
24 "...will increase a present threat."

25 15:55

26 Pausing there, that is sufficient to satisfy the second
27 limb of the test, present and continuing. But the
28 court goes on to say:

29

1 "It may increase possibly significantly, depending on
2 the nature of the evidence and other unknown
3 contingencies, arising out of the inquest. The risk
4 accordingly must qualify as real, continuous and
5 present."

15:56

6
7 I think the point the court was making there is that
8 one witness's evidence may be more controversial than
9 another but the threats to the applicants in that case
10 was real and immediate. So more than trivial or
11 fanciful, first point, and present and continuing, the
12 second.

15:56

13
14 Similar comments my Lord are made, what I hope is
15 paragraph 46 of that judgment, you will see it in the
16 second half of page 129 of my written submissions. And
17 if I could draw your attention to the first six lines
18 of that please. This is a quotation which appears
19 below paragraph 118 within the written submissions. It
20 reads:

15:56

21
22 "Against that fluid and unpredictable background and in
23 the context of an ongoing terrorist campaign in which
24 police officers very much remain as higher risk targets
25 compared to the general population, the evidence points
26 in the words of Soering..."

15:57

27
28 That's the Soering v. UK case.
29

1 "...to substantial grounds for believing that they face
2 real risks of a murderous attack. The risk could not
3 be dismissed as fanciful, trivial or the product of
4 fevered imagination."

15:57

5
6 A crossover, my Lords, as we can see there between the
7 Article 2 and the common law test with the type of
8 language that was used. But the point is the court was
9 stating in very clear terms that the risk was real.

15:57

10
11 As your Lordship will know, from having reviewed the
12 authorities already, there were three judgments of the
13 Court of Appeal in that case. There was Lord Justice
14 Girvan's reasoned judgment, there was Lord Chief
15 Justice Morgan's reasoned judgment, the two agreed with 15:58
16 one another and then there was Lord Justice Higgins as
17 well, I believe, who agreed with both in a much more
18 concise judgment.

19
20 I am going to touch upon Lord Chief Justice Morgan's 15:58
21 decision, if I may, and paragraph 27. Again I am going
22 to take you through that in the written submission. So
23 at the bottom of page 130 of the written submission
24 please. The point I am about to make respectfully to
25 the Inquiry is, this is a second Court of Appeal 15:58
26 judgment stating that in the security situation within
27 Northern Ireland it is unsurprising that anonymity
28 applications are frequently granted for former officers
29 because in this case they were dealing with former

1 police officers as well.

2
3 So at paragraph 27 of Lord Chief Justice Morgan's
4 judgment, he stated:

5
6 "In Northern Ireland there is however a particular
7 context. Police officers have been subject to threats,
8 targeting and attacks by well organised and resourced
9 terrorist organisations using lethal force for many
10 years. It is hardly surprising, therefore, that where 15:59
11 the threat emanates from such a group the Osman test
12 should be more frequently satisfied."

13
14 I'll make a few further observations about the Northern
15 Ireland context, if I may, through the Coagh judgment 15:59
16 which you will see is the next case listed within the
17 written submissions. Really the value to the Inquiry,
18 we say, from that judgment is, firstly, it shows the
19 application in real terms of the guidance provided in
20 C. So, Lord Justice Girvan and Lord Chief Justice 16:00
21 Morgan's recent decisions. And, secondly, we see a
22 reputation of the precautionary principle being applied
23 which emanated from a couple of inquests prior to the
24 Jordan Inquest but ultimately arrived in the written
25 judgment of Mr Justice Stephens as he was then in the 16:00
26 Jordan Inquest.

27
28 So with that, my Lord, I respectfully ask that you turn
29 the written submission over to page 133 and at the

1 bottom of page 133 you will see the beginning of what
2 Mr Justice Stephens said in Jordan. And in particular
3 at paragraph 118 of his decision in that case. It was
4 a judicial review of the inquest, the Coroner's
5 decision. And it reads as follows:

16:01

6
7 "In carrying out a balance, a precautionary approach
8 was adopted by Mr Justice Weir in his decision dated
9 29th of October 2013 in the inquest into the death of
10 Roseanne Mallon, the 20th of 5th '05. A similar
11 approach was adopted by Mr. Justice Deeny in his
12 judgment dated 17th and 18th September 2012..."

16:01

13
14 And the citation is given, at paragraph 101. And
15 here's the important information:

16:01

16
17 "A precautionary approach is not acting without
18 evidence or good reason but rather involves recognition
19 that;

16:01

20
21 A) on one side of the balance, the public authority is
22 dealing with the potential for a catastrophic loss of
23 life, and/or;

24 B) the public authority is having to anticipate
25 respectively in circumstances where events at the
26 inquest and the consequences of a result may not be
27 predictable from all of the subjective perspectives in
28 play including those who would carry out murderous
29 attacks. So in simple terms it is difficult to

16:02

1 anticipate precisely what will happen during the course
2 of the proceedings, it's also difficult to predict what
3 the dissident republicans, who are posing the threat,
4 will do. And we respectfully observe that it is
5 perfectly understandable why the precautionary 16:02
6 principle has worked its way into the jurisprudence
7 within Northern Ireland given the significant
8 consequences of what can result."

9
10 The second and final thing I would like to draw out of 16:02
11 the Coagh judgment my Lord, is below, at paragraph 135
12 of the written submission and it's paragraph 16 of
13 Mr Justice Humphreys ruling in Coagh. He delivered two
14 rulings on anonymity applications in that inquest, one
15 was do with former soldiers, and one was to do with 16:03
16 former police officers. This was the decision in the
17 application relating to the police officers. I am
18 going to draw your attention in particular to 16(i) but
19 I'll read out what comes before that first:

20 16:03
21 "I have taken all of the generic evidence into account
22 in the respective individual applications. I have
23 applied the precautionary approach in analysing each
24 and I am cognisant of the following; if either the
25 common law test is satisfied or Article 2 is engaged, 16:03
26 then anonymity is the minimum protection which the
27 court should afford."

28
29 Your Lordship queried a moment ago about the duty of

1 Article 2 is engaged, the duty being to adopt
2 reasonable steps to protect life. What Mr Justice
3 Humphreys is saying is, the grant of anonymity is the
4 minimum reasonable step that should be granted. There
5 may be further derogations in individual cases, which 16:04
6 is appropriate, by that I mean derogations from the
7 principle of open justice, so things like screening and
8 so forth, but we haven't reached that point in this
9 Inquiry yet. He is saying the name, anonymity is the
10 minimum reasonable protection. And, as your Lordship 16:04
11 observed earlier, that's been repeated by Mr Justice
12 Horner in the Jordan Inquest findings as well.

13
14 I am going to leave -- and my Lord, my submissions in
15 relation to common law, the common law test will be 16:05
16 much briefer, but just summing-up in relation to
17 Article 2. As I have said already, there must be a
18 real risk, that is a risk that is more than fanciful or
19 trivial, we say that is obviously satisfied on general
20 open source information, general threat assessment and 16:05
21 the individual circumstances and that risk must be
22 immediate, namely present and continuing, again readily
23 and made out. We point out that attack is likely, that
24 attack if successful is lethal, the police are the
25 likely targets of that attack and the refusal of 16:05
26 anonymity increases materially the risk of such an
27 attack to the individuals.

28
29 Just before I touch on the common law test. One issue

1 that I know the Inquiry will be interested in is some
2 of the officers or former officers having given
3 evidence under their own names previously. And in due
4 course, whilst I won't read it out to the court now, I
5 would invite your attention to what Mr Justice Deeny 16:06
6 had said about that in the first instance decision of
7 the C case, and in particular at paragraph 90.

8
9 My respectful observation at this stage is more basic
10 than that of Mr Justice Deeny. If the Article 2 test 16:06
11 is satisfied, if you are satisfied there is a real and
12 immediate risk and that the giving of evidence without
13 anonymity would either create or materially increase
14 the risk, the test is satisfied and the application
15 should be granted. If the officer has given evidence 16:06
16 before under their own name, he or she may have
17 increased the risk to them as a result of that but the
18 Article 2 test, we respectfully say, can be considered
19 separately. And where the giving of evidence under
20 one's own name previously may have more purchase in the 16:07
21 Inquiry's mind is under the common law test when
22 arriving at the appropriate balance of fairness.

23
24 So, my Lord, the common law test then. We know and
25 there doesn't seem to be any controversy in relation to 16:07
26 this, but at its core is the issue of fairness and that
27 includes fairness to everyone involved including the
28 former officer who is seeking anonymity. Officer L,
29 paragraph 22, explained that where such applications

1 are made and involve fears of the individual officers,
2 the requirement is to apply anxious scrutiny to the
3 application. And there arises a balancing exercise
4 between fairness to the individual versus the fairness
5 to the Inquiry and the others involved in the Inquiry. 16:08

6
7 One of the most prominent considerations in that
8 balancing exercise, not the only but one of the most
9 prominent would be the subjective fears of the
10 individual. We are relying in particular on the words 16:08
11 of Lord Chief Justice Woolf in the Saville decision
12 from 2000.

13
14 Now, what about those subjective fears in respect of
15 officers, the five officers who are making the 16:08
16 application in this Inquiry? The first thing this
17 Inquiry will need to consider is; are they

18 well-founded? We rely on the open source material, the
19 threat assessment and individual statements of the
20 officers to demonstrate compellingly that they are 16:09
21 well-founded concerns. Each of those officers have

22 spent their entire career under a general degree of
23 fear and that has continued into their retirement. And
24 other considerations that the Inquiry will be taking
25 into account are the speed and ease with which 16:09
26 information is shared in the modern world, in

27 particular social media but not exclusively. And in
28 our skeleton argument we refer to paragraph 19 of
29 Mrs Justice Keegan's decision in the Ballymurphy

1 Inquest where she talked about that as being a relevant
2 consideration in the common law context.

3
4 The Inquiry will want to take into account how
5 significantly, if at all, a grant of anonymity, 16:09
6 particularly when ciphers are applied, that would
7 impede the Inquiry fulfilling its Terms of Reference.
8 We say quite simply it wouldn't.

9
10 And we also respectfully make two further submissions, 16:10
11 firstly, if the officers are not in fear, the Inquiry
12 may well feel that the quality of their evidence is
13 likely to be better. And, secondly, we rely on the
14 chilling effect on others if anonymity is not granted
15 and in particular the Chief Superintendent's statement 16:10
16 at page 152, or page 153, where he comments on the
17 effect on others, other police officers and the
18 difficulties in recruiting them to engage in sensitive
19 roles if anonymity is not granted.

20 16:11
21 So, my Lord, drawing to a close in relation to the
22 common law test. We respectfully say the court
23 doesn't, the Inquiry doesn't necessarily need to
24 consider it. There is ample evidence upon which to be
25 satisfied that Article 2, the Article 2 test is met in 16:11
26 relation to all five applicants. But if the Court did
27 have recourse to the common law test, the correct
28 balance would fall in favour to granting anonymity to
29 the extent that each officer requests.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

And relevant to that my Lord is an observation made in one of the CP's written submissions, the Fox Law submissions and the issue that has been raised is the value in a name. So we know that Lord Chief Justice Woolf in the Saville Inquiry decision queried the value to the Inquiry and the participants in the Inquiry of a name of an individual if they are ciphered versus the value to the individual of a grant of anonymity and the fear that would be caused to them relevant to the common law test.

And Fox Law submissions quote a number of cases in which they talk about the value of a name being included in press reporting of court proceedings. What we would respectfully invite the Inquiry to do when analysing those decisions is think about the context. The cases quoted are talking about Article 8 rights and Article 10 rights, they are not talking about fear of death, they are not talking about the fears arising in the context of an Article 2/common law application for anonymity.

CHAIRPERSON: Indeed in Guardian, Lord Rodgers specifically separated the two out.

MR. HENRY: And therefore, the appropriate guidance to follow we respectfully say is in the Saville decision.

So my Lord, drawing to a close I'll just make a couple more observations about the Fox Law submissions as

1 briefly as I can. The submission was made that the
2 fear of the police officers was irrational, the five
3 officers who are requesting anonymity.

4 CHAIRPERSON: Give me a second, I didn't quite catch
5 that. 16:13

6 MR. HENRY: The submission was made that the fear was
7 irrational.

8 CHAIRPERSON: This is the Fox Law submission?

9 MR. HENRY: That's correct. And we say simply in light
10 of the evidence which I have taken some time and care 16:13
11 to go through with you this afternoon and the time for
12 which we are grateful, that submission simply cannot
13 stand.

14
15 The second submission arising from that in the Fox Law 16:13
16 document is that because the fear is irrational the
17 PSNI should reassure the police applicants or former
18 officers that they are not actually at threat and we
19 fundamentally disagree with that. We say the evidence
20 paints a compelling picture that there is a threat. 16:14

21
22 The suggestion has been made my Lord that what if the
23 details are only disclosed or the name of the officer
24 is only disclosed to the CPs or only disclosed to the
25 CP's lawyers. And whilst that is sufficient in many 16:14
26 respects for non-sensitive materials, the protection
27 which is in place is the undertaking and to some extent
28 professional obligations as well my Lord. When you're
29 dealing with an Article 2 risk that is not an adequate

1 protection.

2
3 And again we point to the difference in behaviour
4 between individuals who are security, routinely
5 security conscious and those who are not. Nobody is 16:15
6 making any suggestion that information would be
7 deliberately disclosed, that suggestion is not made for
8 a second, but inadvertent mistakes happen. Papers can
9 be lost, papers can be set aside, somebody can say the
10 wrong thing in the wrong company not realising who is 16:15
11 listening, there is an infinite number of possibilities
12 but the undertaking itself doesn't provide that.

13
14 So my Lord, you have been very generous as with my
15 friends with the time afforded this afternoon and we 16:16
16 are grateful for that, but those are my respectful
17 submissions.

18 CHAIRPERSON: Thank you very much Mr. Henry.

19 MR. GREANEY: My Lord, next we have scheduled Ms. Fee,
20 on behalf of his Majesty's government. We are not far 16:16
21 short of 4.30, but I don't know for certain by what
22 time Ms. Fee thinks she would finish if she started
23 now. That may determine whether you hear from her now.

24 CHAIRPERSON: well Ms. Fee, first of all would you be
25 content to make submissions this afternoon? 16:16

26 MS. FEE: Mr. Chairman I think I will be about 10
27 minutes. I am conscious that Mr. Henry has covered
28 much of the ground that I might otherwise have covered
29 and Mr. Greaney similarly has covered much of the legal

1 principle that I might otherwise have covered so I am
2 in your hands, Mr Chairman, I estimate it will be
3 around 10 minutes.

4 CHAIRPERSON: I am very happy to hear your submissions
5 if you are content to present them today. 16:17

6 MS. FEE: Thank you, Mr Chairman.

7
8
9 SUBMISSION BY MS. FEE:

10 16:17
11 MS. FEE: Mr Chairman, you have the detailed written
12 submissions on behalf of HMG and they appear starting
13 at page 211 of the bundle. And those submissions are
14 accompanied by, following immediately afterwards in the
15 same bundle at page 229, an open witness statement from 16:17
16 a GCHQ witness and starting at 232 an open damage
17 assessment in respect of UK intelligence community or
18 UKIC witnesses. So those are the open documents
19 Mr Chairman.

20 16:17
21 HMG welcomes the Chairman's approach of seeking to give
22 early decisions and directions to Core Participants and
23 appreciate the opportunity to make a representative
24 anonymity application. As is set out in the written
25 submissions, the government anticipate that almost all 16:18
26 current and former UKIC, UK Intelligence Community,
27 staff and those in other parts of HMG with similarly
28 sensitive roles will seek protection of their names and
29 designations including cover names and other personal

1 identifying information. The Inquiry's helpful
2 approach in facilitating representative anonymity
3 applications will allow these issues to be explored in
4 the context of UKIC witness from GCHQ which have
5 provided the statement which I have referred to.

16:18

6
7 HMG envisages that the issues raised in this
8 representative application will be common to many
9 individuals in a similar position and dealings with
10 issues common to multiple perspective applicants will
11 result in significant advantages in terms of avoiding
12 delay and unnecessary duplication of extremely similar
13 arguments. The reason, Mr. Chairman, that many of the
14 issues raised in the representative application will be
15 common across UKIC is because of the similar
16 sensitivities inherent in how these jobs are performed
17 and the similar risks that attach.

16:19

16:19

18
19 The cohort based representative approach formulated by
20 the Inquiry has significant advantages over a witness
21 by witness individualised and fact-specific approach.
22 So while, Mr Chairman, you will have the benefit of
23 witness-specific information and a closed statement has
24 also been served, the general concerns are common
25 across the UKIC witnesses.

16:19

16:19

26
27 I won't, Mr. Chairman, take any time in relation to the
28 legal principles and the public interest test which can
29 be found at page 213 to 216 of the bundle in HMG's

1 submissions but I would simply draw your attention,
2 Mr. Chairman, to the fact that the HMG submissions at
3 paragraph 15, which is at page 216 of the bundle,
4 highlight the important recent Supreme Court decision
5 in a matter which arose from the Thompson Inquest and 16:20
6 that authority, I won't open it Mr. Chairman, unless
7 you wish me to, but it's at page 1065 to 1106 of the
8 authorities bundle. The Supreme Court carefully
9 explained the role of the Secretary of State in making
10 assessments in relation to national security. That's 16:20
11 at paragraph 38 of the judgment. And we set that out
12 in the submissions at paragraph 15, Mr. Chairman.

13
14 It stated:

15
16 "Further, the Secretary of State has been political 16:21
17 authority and responsibility to make that assessment.
18 In assessing national security it is the Secretary of
19 State who has the democratic authority and
20 institutional confidence to make the relevant 16:21
21 assessment and the degree of respect due to be given to
22 his assessment by a court has to take account of this."

23
24 As you will be aware, Mr. Chairman, it's in a slightly
25 different context in that that arose out of a matter 16:21
26 from the Thompson Inquest involving whether or not a
27 gist should be disclosed but you may feel that there
28 is, nonetheless, some helpful parallels which can be
29 drawn.

1 In the same judgment at paragraphs 49 to 52, that's at
2 page 1081 of the authorities bundle and set out at
3 paragraph 16 of HMG's submission, the court considered
4 the minister's assessment of whether disclosure, in
5 that case a gist, would cause a real risk of serious 16:22
6 harm to important public interest which is of course,
7 the PII test. The court noted:

8
9 "The minister's assessment of the threat from terrorism
10 was that for a number of years there had been in the 16:22
11 United Kingdom and, in particular in Northern Ireland,
12 a very serious threat posed by terrorist organisations
13 actively engaged in campaigns of violence. The
14 minister recognised that the majority of these
15 terrorist organisations in Northern Ireland were 16:22
16 observing ceasefires but, nevertheless, he asserted
17 that the threat of terrorist violence remained and
18 residual terrorist groups continued to regard violence
19 as a way of furthering their objective. He assessed
20 that any disclosure of the identities of any 16:22
21 individuals working to counter terrorism, as well as
22 any disclosure of tactics, techniques or procedures
23 used, would damage capabilities for countering
24 terrorism in Northern Ireland."

25
26 So I simply draw that to your attention, Chairman, as a
27 recent decision, which might be of some assistance.

28
29 I won't take, Mr. Chairman, you through HMG's

1 submission about Article 2 and the common law. Those
2 largely echo what has already been heard from both of
3 my learned friends in relation to the Re Jordan
4 application, Re C's application and other cases,
5 particularly in Northern Ireland context.

16:23

6
7 The precautionary approach similarly, Mr. Chairman has
8 already heard about in detail, that also is referenced
9 in the HMG submissions.

10
11 Moving on from the Article 2 arguments, Chairman, you
12 will find starting at page 221 of the bundle and
13 paragraph 26 of HMG's submissions:

16:23

14
15 "HMG has sought to draw out..."

16
17 At paragraph 28.

18
19 "... the principle competing public interest factors for
20 consideration..."

16:24

21
22 If, Chairman, you get to the balancing exercise stage.
23 And some of those are listed in the Inquiry's Act
24 itself under section 19 and those include the need to
25 allay public concern. The need to avoid or reduce a
26 risk of harm to the relevant staff and the risk of
27 damage to national security. But you will see,
28 Mr. Chairman, that HMG's submissions, while they deal
29 with those matters, for example public concern is dealt

16:24

1 with starting at paragraph 32, they also have sought to
2 draw out other interests which may be relevant. So
3 it's recognised that the interests of the families will
4 be something that you will wish to consider, Chair, and
5 that is dealt with at paragraph 35.

16:25

6
7 One matter which has arisen in some of the Core
8 Participant submission has been the extent to which
9 alternatives to restriction orders have been
10 considered. That is dealt with starting at page 227 of
11 the bundle, at paragraph 55 under:

16:25

12
13 "Alternative to restriction orders."

14
15 HMG's position is that the sensitivities attached to
16 the names, designations and cover names of UKIC staff
17 and those in other parts of HMG with similarly
18 sensitive roles are such that there is no alternative
19 mechanism which can provide adequate protection and
20 Mr. Henry has already made submissions about in
21 advertent disclosure and I simply adopt those.

16:25

16:25

22
23 I don't propose, Mr. Chairman, unless it would be of
24 assistance to go through the risk of harm and danger
25 under the public interest balancing exercise. We have
26 dealt with that starting at page 223 of the HMG
27 submissions but there are certainly overlapping
28 considerations as between the Article 2 risks and the
29 environment to Northern Ireland and the risk of harm

16:26

1 and danger that might be considered under the balancing
2 test, if necessary, in a slightly different context.

3
4 HMG acknowledges that some of the Core Participants
5 have expressly recognised the different and special 16:26
6 operational context within which intelligence personnel
7 operate and while I don't propose to take you through
8 the witness statement and open damage assessment in any
9 detail, Mr Chairman, you will see the reference in the
10 witness statement at paragraph 8 to the fact that the 16:26
11 witness indicates:

12
13 "We live our lives carefully, conscious of the need to
14 protect our identities."

15 16:27
16 By definition these are people who protect their
17 identities on a daily basis.

18
19 It's not possible to substantively address in open all
20 of the points which are raised in submissions made by 16:27
21 other Core Participants, it will be possible to deal in
22 further detail with some of those points in closed
23 Mr. Chairman. But unless there is any point on which I
24 can specifically assist you, I think much of the ground
25 has been covered by my learned friends. 16:27

26 CHAIRPERSON: Yes, thank you very much Ms. Fee. Well,
27 Mr. Greaney.

28 MR. GREANEY: That would seem a convenient moment to
29 stop for the day and to restart again please, sir, at

1 10.30 tomorrow morning.

2

3

4

5

THE HEARING WAS THEN ADJOURNED

6

TO FRIDAY, 20TH MARCH 2026 AT 10.30 AM

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

I N D E X

PAGE

SUBMISSION BY MR. GREANEY:	1
LUNCHEON ADJOURNMENT	43
THE HEARING CONTINUED AFTER LUNCH	43
SUBMISSION BY MR. HENRY:	56
THE HEARING ADJOURNED BRIEFLY	85
SUBMISSION BY MS. FEE:	113
THE HEARING WAS THEN ADJOURNED	120

	82:22, 83:5 17th [1] - 104:12 18 [1] - 26:21 189 [1] - 78:21 18th [1] - 104:12 19 [5] - 34:7, 35:13, 48:6, 108:28, 117:24 190 [3] - 73:19, 78:21, 79:14 1996 [1] - 29:1 1997 [1] - 40:1 1998 [3] - 13:20, 15:8, 40:2 19TH [1] - 1:1 1st [3] - 67:21, 72:13, 72:14	2021 [2] - 72:6, 73:23 2022 [3] - 74:23, 75:4, 75:28 2023 [2] - 75:4, 75:12 2024 [1] - 76:13 2025 [5] - 15:25, 61:28, 80:23, 81:20, 84:7 2026 [10] - 1:1, 6:16, 7:9, 9:8, 10:20, 13:4, 20:21, 21:15, 21:28, 120:6 2027 [1] - 27:17 207 [1] - 63:3 20:00 [1] - 79:20 20TH [1] - 120:6 20th [1] - 104:10 210 [1] - 87:11 211 [1] - 113:13 213 [1] - 114:29 216 [2] - 114:29, 115:3 217 [2] - 63:2, 63:11 218 [3] - 63:12, 63:15, 63:17 21st [8] - 7:9, 7:15, 8:4, 9:8, 9:14, 13:3, 45:14, 82:9 22 [1] - 107:29 221 [1] - 117:12 223 [1] - 118:26 227 [1] - 118:10 229 [1] - 113:15 22nd [1] - 72:6 23 [2] - 51:7, 84:22 232 [1] - 113:16 24 [1] - 53:28 25 [3] - 17:6, 63:12, 66:28 26 [4] - 63:3, 63:12, 63:17, 117:13 27 [2] - 102:21, 103:3 28 [1] - 117:17 29 [1] - 95:18 29th [1] - 104:9 2nd [2] - 48:22, 66:29	14:22, 15:9, 27:4, 27:15, 29:17, 45:25, 46:11, 46:17, 92:23 300 [3] - 20:16, 51:16, 84:4 312 [2] - 65:6, 65:11 313 [2] - 65:6, 65:16 314 [1] - 65:29 315 [1] - 66:9 32 [1] - 118:1 322 [1] - 67:13 323 [2] - 67:13, 67:17 33 [1] - 76:16 342 [1] - 64:3 343 [2] - 63:29, 64:6 344 [1] - 65:2 35 [1] - 118:5 359 [1] - 66:17 360 [2] - 66:20, 67:6 369 [2] - 72:2, 72:9 38 [1] - 115:11 384 [2] - 68:10, 68:12 385 [2] - 68:10, 68:16 393 [1] - 75:5 3rd [1] - 82:9	6 677 [1] - 51:8 6th [1] - 7:5
'05 [1] - 104:10				7 7 [1] - 92:23 71 [1] - 99:14 72 [2] - 84:14, 84:15
1	2			8 8 [3] - 49:14, 110:18, 119:10 82 [1] - 69:20 85 [1] - 121:8
1 [10] - 43:1, 60:20, 62:28, 63:2, 63:3, 63:8, 63:11, 92:22, 121:4 10 [7] - 5:29, 29:16, 50:8, 71:8, 110:19, 112:26, 113:3 10.30 [2] - 120:1, 120:6 100 [1] - 20:19 100,000 [1] - 26:22 101 [1] - 104:14 1065 [1] - 115:7 1081 [1] - 116:2 10th [1] - 69:16 1106 [1] - 115:7 113 [1] - 121:9 114 [4] - 84:12, 84:15, 96:25, 97:3 115 [1] - 98:4 117 [1] - 98:13 118 [2] - 101:19, 104:3 11th [1] - 48:22 120 [1] - 121:10 1226 [1] - 52:4 127 [1] - 96:20 129 [1] - 101:16 130 [1] - 102:23 133 [2] - 103:29, 104:1 135 [1] - 105:11 14 [2] - 53:16, 65:19 15 [5] - 31:22, 37:19, 85:16, 115:3, 115:12 152 [2] - 86:19, 109:16 153 [1] - 109:16 158 [2] - 60:5, 60:11 15th [5] - 13:19, 15:8, 15:24, 74:25, 80:23 16 [3] - 70:22, 105:12, 116:3 16(i) [1] - 105:18 167 [1] - 80:15 168 [1] - 80:15 169 [1] - 81:3 16th [2] - 73:28, 76:13 17 [1] - 70:22 173 [1] - 81:17 174 [3] - 81:17,	2 [30] - 49:14, 50:6, 58:3, 58:16, 58:19, 58:25, 59:18, 63:12, 83:11, 83:12, 85:1, 85:7, 92:9, 92:23, 94:15, 94:20, 95:11, 96:29, 102:7, 105:25, 106:1, 106:17, 107:10, 107:18, 109:25, 111:29, 117:1, 117:11, 118:28 2/common [1] - 110:21 20 [1] - 43:1 20,000 [1] - 16:17 200 [2] - 20:16, 20:20 2000 [2] - 28:4, 108:12 2002 [1] - 28:22 2005 [4] - 33:29, 34:28, 35:13, 49:13 2006 [1] - 27:28 2008 [1] - 28:5 2009 [4] - 64:9, 64:20, 71:29, 84:6 2010 [4] - 65:9, 65:27, 66:13, 67:4 2011 [1] - 66:29 2012 [4] - 52:16, 67:22, 97:12, 98:15 2012.. [1] - 104:12 2013 [3] - 68:27, 69:5, 104:9 2016 [4] - 68:7, 68:9, 69:16, 82:10 2017 [5] - 69:17, 71:5, 71:12, 71:23, 71:29 2018 [2] - 69:18, 71:1 2019 [5] - 23:19, 72:1, 72:8, 72:14, 76:2	3 3 [42] - 4:9, 5:22, 6:13, 6:15, 6:22, 7:6, 7:8, 7:12, 8:1, 8:5, 8:11, 8:26, 9:13, 9:14, 9:16, 9:17, 9:26, 9:28, 10:3, 10:20, 10:26, 11:1, 11:2, 11:4, 11:20, 11:23, 11:27, 12:3, 12:9, 12:14, 12:26, 13:7, 13:13,	4 4 [6] - 10:18, 10:21, 10:29, 27:16, 60:13, 70:3 4.1 [2] - 69:20, 70:5 4.2 [1] - 70:10 4.3 [1] - 69:21 4.30 [1] - 112:21 4.4 [1] - 69:29 4.5 [1] - 69:29 400 [1] - 62:20 409 [1] - 76:7 410 [1] - 77:25 415 [2] - 62:26, 62:28 43 [5] - 52:4, 70:18, 99:13, 121:5, 121:6 44 [1] - 51:29 45 [1] - 62:25 450,000 [1] - 25:10 46 [1] - 101:15 49 [1] - 116:1 4th [1] - 81:20	9 9 [1] - 27:27 90 [1] - 107:7 9th [7] - 6:16, 6:25, 8:8, 16:5, 32:22, 74:12, 75:12
			4	A A4 [1] - 87:2 ability [3] - 5:10, 20:1, 39:15 able [5] - 17:7, 54:8, 63:19, 89:21, 90:5 absence [1] - 88:11 absolutely [1] - 25:14 accept [1] - 50:12 access [15] - 5:9, 11:14, 12:25, 17:5, 26:10, 28:11, 34:20, 34:22, 39:7, 40:4, 40:9, 40:20, 40:23, 41:9, 41:15 accessed [1] - 40:12 accommodates [1] - 36:23 accompanied [1] - 113:14 accord [1] - 24:17 accordance [1] - 37:21 according [1] - 100:18 accordingly [2] - 77:14, 101:4 account [5] - 92:2, 105:21, 108:25, 109:4, 115:22
			5 5 [2] - 60:22, 92:23 52 [1] - 116:1 54 [1] - 53:2 55 [1] - 118:11 56 [1] - 121:7 5th [2] - 69:4, 104:10	

<p>accredited [1] - 40:12</p> <p>accurate [2] - 32:20, 47:19</p> <p>accurately [2] - 32:28, 47:18</p> <p>accused [2] - 77:26, 78:2</p> <p>accused's [1] - 68:22</p> <p>achievable [1] - 30:9</p> <p>achieve [3] - 8:6, 21:29, 22:4</p> <p>achieves [1] - 8:5</p> <p>achieving [1] - 7:29</p> <p>acknowledge [3] - 17:22, 22:21, 39:17</p> <p>acknowledged [2] - 18:15, 33:20</p> <p>acknowledges [2] - 36:9, 119:4</p> <p>acknowledging [2] - 23:13, 29:26</p> <p>act [1] - 82:16</p> <p>Act [8] - 23:19, 33:29, 34:8, 34:28, 35:13, 48:6, 49:13, 117:23</p> <p>acting [2] - 39:22, 104:17</p> <p>actively [1] - 116:13</p> <p>activity [1] - 64:10</p> <p>actors [1] - 34:18</p> <p>acts [1] - 82:13</p> <p>actual [3] - 53:12, 68:23, 92:4</p> <p>acutely [1] - 7:17</p> <p>add [2] - 2:9, 55:22</p> <p>addition [2] - 28:18, 85:2</p> <p>address [12] - 2:12, 4:28, 11:20, 48:15, 48:17, 54:19, 57:29, 90:7, 91:27, 95:7, 99:17, 119:19</p> <p>addressed [2] - 29:6, 49:8</p> <p>addressing [1] - 7:23</p> <p>adequate [2] - 111:29, 118:19</p> <p>adequately [1] - 54:16</p> <p>adhered [2] - 30:22, 30:23</p> <p>ADJOURNED [4] - 85:20, 120:5, 121:8, 121:10</p> <p>adjourning [1] - 8:7</p> <p>ADJOURNMENT [5] - 6:5, 31:25, 43:8, 43:11, 121:5</p> <p>adjustment [1] - 31:5</p>	<p>adjustments [1] - 63:27</p> <p>admit [1] - 80:18</p> <p>admits [1] - 76:11</p> <p>admitted [1] - 76:16</p> <p>ado [1] - 18:17</p> <p>adopt [3] - 95:13, 106:1, 118:21</p> <p>adopted [3] - 53:7, 104:8, 104:11</p> <p>advance [3] - 12:26, 13:3, 34:19</p> <p>advanced [1] - 54:14</p> <p>advantages [2] - 114:11, 114:20</p> <p>advent [1] - 118:21</p> <p>advise [2] - 20:3, 20:19</p> <p>advocate [1] - 56:4</p> <p>Advocates [1] - 6:29</p> <p>affairs [3] - 23:14, 30:25, 41:5</p> <p>affected [2] - 5:5, 23:27</p> <p>afford [1] - 105:27</p> <p>afforded [1] - 112:15</p> <p>afraid [1] - 70:19</p> <p>AFTER [4] - 6:5, 31:25, 43:11, 121:6</p> <p>afternoon [5] - 43:15, 56:16, 111:11, 112:15, 112:25</p> <p>afterwards [1] - 113:14</p> <p>agenda [2] - 4:13, 14:15</p> <p>agent [1] - 68:18</p> <p>ago [4] - 9:16, 48:21, 65:19, 105:29</p> <p>agree [4] - 9:10, 33:9, 47:24, 50:12</p> <p>agreeable [1] - 20:7</p> <p>agreed [5] - 14:21, 18:23, 58:16, 102:15, 102:17</p> <p>AGS [33] - 4:18, 11:16, 12:29, 15:13, 16:7, 16:13, 17:11, 17:19, 17:28, 18:4, 18:8, 18:13, 18:27, 19:15, 20:3, 20:13, 20:16, 20:22, 20:23, 20:24, 20:26, 20:29, 21:14, 21:16, 21:28, 22:7, 22:11, 22:16, 22:18, 22:29, 24:11, 26:25, 28:9</p> <p>ahead [4] - 9:29, 13:6, 14:22</p> <p>aim [2] - 21:29, 34:19</p>	<p>air [1] - 56:6</p> <p>AK47 [1] - 69:1</p> <p>alight [1] - 81:1</p> <p>allay [1] - 117:25</p> <p>allegedly [1] - 68:19</p> <p>allocated [1] - 8:29</p> <p>allow [2] - 19:1, 114:3</p> <p>allowed [2] - 37:29, 47:23</p> <p>almost [3] - 20:18, 20:20, 113:25</p> <p>alone [4] - 49:21, 85:7, 92:8, 93:6</p> <p>aloud [1] - 59:26</p> <p>Alternative [1] - 118:13</p> <p>alternative [1] - 118:18</p> <p>alternatives [1] - 118:9</p> <p>AM [1] - 120:6</p> <p>amended [1] - 23:18</p> <p>ammunition [1] - 69:2</p> <p>amount [2] - 19:16, 36:17</p> <p>ample [1] - 109:24</p> <p>amputated [1] - 65:24</p> <p>analysing [2] - 105:23, 110:17</p> <p>analysis [2] - 12:22, 31:12</p> <p>Analysis [1] - 53:29</p> <p>AND [1] - 85:20</p> <p>annexed [1] - 96:10</p> <p>anonymity [56] - 2:15, 2:22, 38:26, 43:3, 48:1, 48:3, 48:9, 48:16, 48:18, 48:21, 48:25, 49:4, 49:10, 53:17, 53:21, 53:22, 53:23, 53:24, 54:24, 55:5, 55:17, 59:10, 84:20, 88:10, 88:14, 91:6, 91:19, 92:17, 93:28, 93:29, 94:5, 94:16, 95:9, 95:19, 96:3, 96:7, 96:14, 97:2, 98:9, 102:27, 105:14, 105:26, 106:3, 106:9, 106:26, 107:13, 107:28, 109:5, 109:14, 109:19, 109:28, 110:9, 110:22, 111:3, 113:24, 114:2</p> <p>ANP [2] - 75:21, 75:24</p> <p>answered [1] - 38:20</p>	<p>answers [1] - 34:23</p> <p>anti [1] - 75:1</p> <p>anti-internment [1] - 75:1</p> <p>anticipate [5] - 4:4, 11:10, 104:24, 105:1, 113:25</p> <p>anticipated [1] - 7:10</p> <p>anticipating [1] - 39:20</p> <p>Antrim [2] - 64:12, 65:27</p> <p>anxious [1] - 108:2</p> <p>anyway [1] - 99:28</p> <p>apart [1] - 88:17</p> <p>apologies [1] - 6:1</p> <p>apologise [2] - 99:16, 100:1</p> <p>apparent.. [1] - 20:8</p> <p>Appeal [6] - 51:29, 96:2, 96:28, 97:11, 102:13, 102:25</p> <p>appear [4] - 43:19, 58:4, 63:25, 113:12</p> <p>appeared [1] - 81:4</p> <p>appearing [1] - 80:28</p> <p>applicants [6] - 54:24, 93:22, 101:9, 109:26, 111:17, 114:10</p> <p>application [26] - 17:14, 50:11, 51:28, 53:17, 55:5, 55:8, 55:12, 58:9, 58:10, 58:23, 59:11, 60:21, 88:7, 96:29, 97:7, 103:19, 105:17, 107:14, 108:3, 108:16, 110:21, 113:24, 114:8, 114:14, 117:4</p> <p>applications [42] - 2:15, 2:17, 2:25, 2:29, 3:4, 3:5, 3:13, 9:1, 9:4, 30:24, 36:2, 37:7, 43:2, 47:28, 49:3, 49:5, 49:10, 49:28, 50:17, 53:4, 53:8, 53:10, 53:12, 53:15, 54:18, 56:26, 57:2, 57:7, 57:11, 57:15, 58:6, 60:8, 84:20, 96:14, 97:15, 98:9, 102:28, 105:14, 105:22, 107:29, 114:3</p> <p>applied [8] - 5:28, 26:3, 49:5, 49:10, 103:22, 105:23, 109:6</p> <p>applies [2] - 13:11, 97:24</p> <p>apply [6] - 3:3,</p>	<p>50:17, 50:23, 94:18, 97:2, 108:2</p> <p>appreciate [3] - 3:20, 95:5, 113:23</p> <p>appreciates [1] - 3:12</p> <p>approach [19] - 13:25, 13:28, 14:2, 31:5, 35:19, 35:23, 36:12, 53:7, 95:12, 95:14, 104:7, 104:11, 104:17, 105:23, 113:21, 114:2, 114:19, 114:21, 117:7</p> <p>approached [1] - 28:1</p> <p>approaching [1] - 25:10</p> <p>appropriate [16] - 17:21, 18:8, 18:15, 24:8, 24:23, 37:14, 37:26, 40:14, 42:28, 49:2, 51:3, 85:3, 92:5, 106:6, 107:22, 110:25</p> <p>appropriately [1] - 26:16</p> <p>April [7] - 11:12, 13:6, 15:24, 41:2, 66:29, 69:17, 74:12</p> <p>area [9] - 15:16, 23:7, 25:6, 38:10, 66:11, 69:4, 71:7, 71:24, 75:1</p> <p>areas [6] - 4:23, 5:2, 21:4, 22:9, 22:21, 23:10</p> <p>argument [2] - 77:8, 108:28</p> <p>arguments [3] - 51:3, 114:13, 117:11</p> <p>arise [2] - 14:28, 17:5</p> <p>arisen [2] - 93:17, 118:7</p> <p>arises [5] - 9:20, 49:12, 58:20, 96:12, 108:3</p> <p>arising [7] - 57:25, 58:18, 59:15, 100:2, 101:3, 110:20, 111:15</p> <p>Armagh [2] - 60:25, 67:21</p> <p>armed [2] - 70:14, 77:14</p> <p>arose [5] - 13:13, 60:24, 63:24, 115:5, 115:25</p> <p>arranged [1] - 40:9</p> <p>arrangement [1] - 41:8</p> <p>arrangements [10] -</p>
--	--	--	--	---

<p>40:24, 41:19, 41:24, 42:14, 47:13, 77:10, 77:18, 77:20, 97:27, 98:5</p> <p>arrive [1] - 92:28</p> <p>arrived [4] - 41:19, 57:27, 96:2, 103:24</p> <p>arriving [1] - 107:22</p> <p>Article [33] - 49:14, 50:6, 50:8, 58:3, 58:16, 58:19, 58:25, 59:18, 83:11, 83:12, 85:1, 85:7, 92:9, 94:15, 94:20, 95:11, 96:29, 102:7, 105:25, 106:1, 106:17, 107:10, 107:18, 109:25, 110:18, 110:19, 110:21, 111:29, 117:1, 117:11, 118:28</p> <p>article [31] - 64:2, 65:8, 65:12, 66:7, 66:19, 66:21, 67:2, 67:15, 67:17, 68:11, 68:16, 72:5, 72:6, 72:7, 72:20, 75:7, 75:12, 75:13, 76:8, 76:13, 76:14, 77:2, 77:24, 78:22, 79:23, 80:16, 80:26, 81:17, 81:20, 81:29, 83:4</p> <p>articles [5] - 78:20, 79:5, 82:13, 83:3</p> <p>AS [5] - 1:1, 6:5, 31:25, 43:11, 85:20</p> <p>aside [1] - 112:9</p> <p>assassination [4] - 66:14, 80:2, 80:5, 81:25</p> <p>assault [2] - 69:2, 71:9</p> <p>asserted [1] - 116:16</p> <p>asserting [1] - 36:20</p> <p>assess [2] - 19:26, 95:1</p> <p>assessed [6] - 25:21, 74:6, 77:17, 77:21, 87:14, 116:19</p> <p>assessing [2] - 20:14, 115:18</p> <p>assessment [39] - 9:10, 20:26, 53:27, 54:2, 54:5, 54:9, 54:15, 54:27, 55:10, 57:12, 70:17, 83:8, 83:28, 85:10, 86:18, 86:27, 88:3, 89:6, 89:18, 90:13, 91:21, 92:3, 92:6, 92:20, 92:25, 92:28, 93:1, 93:6, 93:23, 100:22,</p>	<p>106:20, 108:19, 113:17, 115:17, 115:21, 115:22, 116:4, 116:9, 119:8</p> <p>assessments [9] - 21:6, 21:7, 54:2, 86:23, 87:6, 92:10, 93:13, 100:21, 115:10</p> <p>assist [4] - 20:26, 58:1, 99:18, 119:24</p> <p>assistance [3] - 53:3, 116:27, 118:24</p> <p>Association [4] - 46:29, 47:2, 47:14, 47:17</p> <p>assumed [1] - 39:13</p> <p>assuming [1] - 42:27</p> <p>AT [1] - 120:6</p> <p>attach [1] - 114:17</p> <p>attached [2] - 72:22, 118:15</p> <p>attack [26] - 6:21, 9:20, 51:19, 68:27, 69:3, 70:12, 73:27, 74:1, 74:14, 75:25, 76:2, 87:16, 87:18, 87:29, 90:9, 90:20, 90:24, 92:12, 92:13, 92:14, 102:2, 106:23, 106:24, 106:25, 106:27</p> <p>Attack [1] - 78:25</p> <p>attacked [1] - 10:14</p> <p>attacks [19] - 52:9, 70:24, 70:29, 73:22, 73:26, 80:6, 80:7, 80:9, 83:15, 83:25, 87:19, 87:23, 88:11, 90:26, 98:21, 103:8, 104:29</p> <p>attempt [7] - 22:3, 63:22, 66:14, 68:20, 68:23, 81:26, 89:15</p> <p>attempted [6] - 61:25, 72:17, 73:22, 74:1, 75:24, 96:9</p> <p>attempting [2] - 69:1, 82:14</p> <p>attempts [2] - 80:3, 80:5</p> <p>attention [13] - 5:3, 32:1, 60:10, 67:7, 67:16, 69:19, 70:18, 72:8, 101:17, 105:18, 107:5, 115:1, 116:26</p> <p>attribute [1] - 46:12</p> <p>August [7] - 13:20, 15:8, 69:16, 70:22, 71:1, 74:25, 80:23</p> <p>author [1] - 28:14</p> <p>authorities [10] -</p>	<p>49:22, 51:7, 52:4, 53:6, 96:6, 100:6, 100:7, 102:12, 115:8, 116:2</p> <p>authority [5] - 104:21, 104:24, 115:6, 115:17, 115:19</p> <p>available [15] - 2:3, 8:9, 11:11, 22:2, 32:17, 35:9, 38:14, 40:11, 42:19, 45:19, 45:26, 46:7, 54:4, 84:22, 88:27</p> <p>avoid [3] - 36:13, 62:4, 117:25</p> <p>avoiding [2] - 61:14, 114:11</p> <p>await [1] - 14:27</p> <p>award [1] - 28:3</p> <p>aware [11] - 7:17, 12:15, 18:11, 26:17, 27:25, 43:18, 43:25, 43:29, 45:3, 45:27, 115:24</p> <p>awareness [1] - 89:9</p>	<p>44:13, 50:16, 53:9, 56:24, 63:1, 65:5, 96:19</p> <p>bearing [5] - 8:11, 40:7, 53:4, 85:24, 86:1</p> <p>bears [3] - 5:10, 11:23, 34:23</p> <p>became [4] - 28:20, 32:21, 43:18, 45:3</p> <p>become [5] - 43:29, 45:27, 62:6, 87:19, 87:20</p> <p>bedrock [1] - 10:4</p> <p>beg [4] - 63:27, 64:21, 73:18, 83:5</p> <p>begin [6] - 1:9, 25:5, 45:13, 59:29, 60:11, 78:21</p> <p>beginning [13] - 42:24, 47:26, 60:4, 60:13, 62:26, 64:5, 65:12, 67:26, 68:16, 76:7, 80:1, 84:6, 104:1</p> <p>begins [6] - 63:7, 63:15, 64:2, 66:21, 67:17, 88:24</p> <p>begun [1] - 17:17</p> <p>behalf [12] - 23:20, 50:25, 51:1, 55:18, 55:19, 55:20, 55:23, 56:27, 86:6, 94:3, 112:20, 113:12</p> <p>behaviour [1] - 112:3</p> <p>behind [3] - 34:15, 39:3, 75:24</p> <p>Belfast [5] - 1:24, 69:4, 71:8, 72:13, 83:4</p> <p>Belfast" [1] - 71:3</p> <p>believes [1] - 66:23</p> <p>Belleek [1] - 72:16</p> <p>belongs [1] - 36:22</p> <p>below [15] - 61:14, 61:23, 65:26, 70:4, 71:21, 73:27, 77:27, 80:22, 81:7, 81:29, 82:19, 84:16, 87:25, 101:19, 105:11</p> <p>beneficial [1] - 21:13</p> <p>benefit [9] - 18:28, 28:5, 31:17, 35:24, 42:26, 86:25, 93:14, 95:28, 114:22</p> <p>bereaved [3] - 1:27, 3:8, 34:21</p> <p>beside [1] - 81:8</p> <p>best [2] - 19:25, 30:3</p> <p>better [4] - 41:7, 41:17, 86:8, 109:13</p>	<p>between [14] - 14:20, 15:23, 19:29, 37:29, 43:17, 43:22, 43:26, 46:22, 49:18, 80:11, 102:6, 108:4, 112:4, 118:28</p> <p>beyond [4] - 5:20, 6:14, 23:13, 30:29</p> <p>bill [1] - 24:4</p> <p>Bill [3] - 24:6, 24:17</p> <p>Bishop [1] - 76:2</p> <p>bit [1] - 63:22</p> <p>Black [2] - 67:15, 67:19</p> <p>blame [1] - 46:13</p> <p>blamed [2] - 46:6, 47:10</p> <p>blanket [1] - 62:3</p> <p>blurred [1] - 81:7</p> <p>body [5] - 54:1, 75:13, 76:14, 77:14, 100:6</p> <p>bold [1] - 98:19</p> <p>bomb [11] - 23:1, 65:19, 65:25, 66:5, 66:14, 66:28, 67:4, 68:5, 76:1, 83:14, 83:25</p> <p>Bomb [1] - 32:9</p> <p>Bombing [3] - 24:5, 45:10, 46:4</p> <p>bombing [12] - 6:19, 9:19, 10:1, 10:6, 11:7, 17:20, 28:1, 28:8, 28:16, 28:21, 29:14, 29:19</p> <p>bombs [1] - 71:1</p> <p>bonfire [4] - 75:1, 80:22, 80:29, 81:5</p> <p>bonfires [1] - 80:18</p> <p>booby [1] - 66:28</p> <p>booby-trap [1] - 66:28</p> <p>boom [1] - 75:24</p> <p>boot [1] - 79:19</p> <p>borne [1] - 83:3</p> <p>bottom [6] - 63:14, 64:21, 98:4, 100:11, 102:23, 104:1</p> <p>bound [1] - 94:22</p> <p>brackets [1] - 23:3</p> <p>Bradford [1] - 1:24</p> <p>branch [1] - 86:21</p> <p>Branch [2] - 57:3, 60:21</p> <p>break [10] - 4:5, 5:29, 31:21, 37:19, 38:25, 42:29, 43:16, 85:14, 85:15</p> <p>breaking [1] - 38:16</p> <p>breaks [1] - 31:17</p>
B				
		<p>background [3] - 86:22, 95:28, 101:22</p> <p>backwards [1] - 63:21</p> <p>bad [1] - 45:27</p> <p>balance [4] - 104:7, 104:21, 107:22, 109:28</p> <p>balancing [5] - 108:3, 108:8, 117:22, 118:25, 119:1</p> <p>balls [1] - 79:19</p> <p>Ballymurphy [2] - 84:17, 108:29</p> <p>barracks [1] - 64:12</p> <p>barrister [1] - 83:2</p> <p>base [1] - 92:29</p> <p>based [4] - 27:25, 40:22, 47:5, 114:19</p> <p>baseline [2] - 92:29, 95:19</p> <p>basic [1] - 107:9</p> <p>basis [13] - 2:16, 8:16, 14:9, 14:23, 17:2, 29:14, 35:28, 47:6, 47:9, 50:13, 83:27, 93:6, 119:17</p> <p>Baxter [2] - 28:20</p> <p>BBC [10] - 64:2, 65:12, 66:18, 67:15, 68:11, 72:5, 75:7, 76:8, 78:22, 80:16</p> <p>bear [9] - 4:24, 10:1,</p>		

<p>Breslin [1] - 9:21 Bridger [3] - 28:7, 28:12, 28:15 brief [1] - 96:23 briefe [1] - 106:16 briefings [1] - 84:28 briefly [3] - 2:24, 58:11, 111:1 BRIEFLY [2] - 85:20, 121:8 bring [3] - 13:1, 31:11, 81:28 brings [1] - 12:17 broad [3] - 2:6, 47:27, 57:11 broadcast [6] - 1:14, 1:20, 3:19, 43:26, 44:20, 46:22 broader [1] - 94:7 broken [3] - 38:17, 54:10 brought [1] - 4:24 build [1] - 95:27 building [4] - 1:15, 1:27, 5:26, 44:12 bulk [2] - 52:11, 57:20 bundle [40] - 51:7, 52:4, 53:16, 53:28, 57:14, 60:1, 60:2, 60:4, 62:18, 62:19, 62:28, 63:2, 63:3, 63:5, 63:11, 63:12, 63:13, 63:22, 63:25, 68:10, 69:8, 72:2, 76:6, 78:18, 78:29, 80:15, 81:18, 84:12, 96:6, 96:20, 100:7, 113:13, 113:15, 114:29, 115:3, 115:8, 116:2, 117:12, 118:11 bundles [1] - 63:10 business [1] - 33:13 BY [6] - 1:7, 56:14, 113:9, 121:4, 121:7, 121:9</p>	<p>116:13 candour [1] - 19:8 cannot [9] - 27:1, 30:23, 30:26, 33:24, 36:20, 52:25, 83:12, 98:26, 111:12 capabilities [1] - 116:23 capability [5] - 54:6, 88:22, 88:29, 89:3, 90:8 capable [1] - 87:1 capacity [1] - 42:5 car [11] - 65:25, 66:2, 66:5, 66:14, 66:28, 67:4, 67:5, 67:20, 79:19, 83:25, 89:26 care [2] - 39:6, 111:10 career [4] - 60:25, 65:1, 80:2, 108:22 careful [2] - 73:4, 73:5 carefully [2] - 115:8, 119:13 carried [2] - 6:21, 70:24 Carroll [4] - 64:3, 64:9, 64:24, 67:26 carry [2] - 3:29, 104:28 carrying [1] - 104:7 cars [1] - 73:2 Carswell [4] - 51:5, 51:10, 84:5, 95:17 case [22] - 18:8, 19:22, 36:18, 44:21, 47:21, 51:6, 51:29, 52:16, 58:18, 59:15, 84:9, 92:12, 95:15, 100:21, 101:9, 101:28, 102:13, 102:29, 103:16, 104:3, 107:7, 116:5 cases [9] - 48:5, 85:2, 96:3, 96:8, 96:28, 106:5, 110:13, 110:18, 117:4 casualties [1] - 74:8 catalogued [1] - 37:28 catastrophic [1] - 104:22 catch [2] - 5:29, 111:4 categories [6] - 24:8, 35:22, 36:10, 37:1, 37:2, 57:9 category [2] - 35:23, 88:19 caused [1] - 110:10</p>	<p>CCTV [1] - 77:27 ceasefires [1] - 116:16 cell [2] - 12:2, 12:21 Centre [1] - 53:29 certain [5] - 24:8, 24:28, 48:5, 89:11, 112:21 certainly [8] - 3:20, 3:27, 28:2, 46:9, 46:13, 88:18, 99:10, 118:27 Chair [1] - 118:4 Chairman [22] - 63:10, 112:26, 113:2, 113:6, 113:11, 113:19, 114:13, 114:22, 114:27, 115:2, 115:6, 115:12, 115:24, 116:26, 116:29, 117:7, 117:11, 117:22, 117:28, 118:23, 119:9, 119:23 Chairman's [1] - 113:21 CHAIRPERSON [59] - 1:4, 3:22, 6:3, 6:8, 31:29, 33:1, 33:4, 39:22, 41:29, 43:6, 43:14, 44:2, 44:5, 44:9, 44:15, 47:12, 56:9, 56:21, 56:23, 62:21, 62:27, 63:1, 63:7, 63:15, 63:18, 64:4, 68:8, 69:13, 69:29, 72:3, 73:9, 73:25, 75:6, 76:27, 77:4, 78:28, 79:2, 85:23, 86:9, 86:14, 88:15, 94:20, 94:27, 95:1, 95:14, 99:7, 99:11, 99:21, 99:28, 100:3, 100:9, 100:13, 110:23, 111:4, 111:8, 112:18, 112:24, 113:4, 119:26 challenge [1] - 36:18 challenges [2] - 57:24, 57:26 challenging [3] - 17:28, 18:2, 38:10 chance [1] - 31:9 changes [1] - 97:24 changing [1] - 78:26 chapter [3] - 13:14, 14:29, 15:10 Chapter [46] - 4:8, 5:22, 6:12, 6:15, 6:22, 7:6, 7:8, 7:12, 8:1, 8:5, 8:11, 8:26, 9:13, 9:14, 9:15, 9:17, 9:26,</p>	<p>9:28, 10:3, 10:18, 10:20, 10:21, 10:26, 10:29, 11:1, 11:2, 11:4, 11:20, 11:23, 11:27, 12:3, 12:9, 12:14, 12:26, 13:7, 13:13, 14:22, 15:9, 27:4, 27:15, 27:16, 29:17, 45:25, 46:11, 46:17, 70:3 chapters [3] - 9:6, 10:26, 13:12 charged [1] - 72:17 charged.. [1] - 77:29 charges [1] - 69:3 chased [1] - 30:27 check [1] - 31:16 checked [2] - 8:20, 25:22 checking [1] - 73:2 Chief [15] - 61:25, 67:8, 79:6, 79:16, 80:14, 80:24, 84:19, 86:20, 102:14, 102:20, 103:3, 103:20, 108:11, 109:15, 110:5 children [1] - 79:17 chilling [1] - 109:14 choice [2] - 7:15, 94:3 choices [1] - 94:14 chose [1] - 94:17 chronological [1] - 63:23 chronology [1] - 84:2 CID [2] - 29:3, 57:3 ciphered [1] - 110:8 ciphers [1] - 109:6 circulated [1] - 23:25 circumstances [16] - 8:24, 9:7, 10:27, 14:28, 29:28, 41:9, 41:10, 55:10, 57:24, 58:22, 59:1, 61:3, 85:29, 94:10, 104:25, 106:21 citation [2] - 99:26, 104:14 cite [1] - 51:8 cited [1] - 37:2 City [2] - 75:2, 76:3 civil [2] - 51:15, 67:28 claimed [1] - 64:14 claims [2] - 34:15, 35:1 clarity [1] - 10:28 clear [8] - 10:21, 33:5, 47:5, 48:2, 50:1,</p>	<p>85:1, 97:14, 102:9 clearance [1] - 71:18 clearly [3] - 24:22, 32:26, 41:29 close [7] - 52:26, 61:15, 64:18, 74:29, 98:27, 109:21, 110:28 Closed [4] - 4:28, 9:1, 33:16, 41:26 closed [37] - 3:13, 5:9, 5:11, 5:16, 5:17, 5:18, 9:5, 33:23, 33:24, 34:16, 35:8, 35:10, 35:12, 35:29, 36:4, 36:17, 37:3, 37:11, 37:16, 38:18, 38:28, 39:7, 39:15, 40:4, 42:16, 53:19, 54:7, 55:8, 55:10, 55:13, 57:9, 86:27, 87:7, 93:14, 114:23, 119:22 closure [1] - 24:3 Club [1] - 72:13 CMRO [10] - 5:1, 9:2, 9:4, 35:17, 36:9, 36:22, 36:27, 37:13, 37:20, 38:16 co [2] - 20:13, 20:25 Co [3] - 23:19, 24:5, 66:29 co-operation [2] - 20:13, 20:25 Co-Operation [2] - 23:19, 24:5 coaching [1] - 79:17 Coagh [5] - 53:2, 95:9, 103:15, 105:11, 105:13 cognisant [1] - 105:24 coherent [2] - 12:13, 12:23 cohort [2] - 36:29, 114:19 colleagues [1] - 47:20 collect [1] - 82:15 collection [3] - 20:25, 62:24, 62:25 collections [1] - 62:22 column [4] - 73:28, 73:29, 74:1, 74:27 combinations [1] - 94:13 comfortable [1] - 34:24 coming [3] - 11:20, 64:29, 75:4 commence [4] -</p>
<p style="text-align: center;">C</p> <p>C's [2] - 51:28, 117:4 Caldwell [9] - 61:25, 67:9, 78:25, 79:7, 79:16, 79:22, 80:14, 80:25, 81:11 Caldwell's [2] - 80:28, 81:5 camera [3] - 81:21, 81:23, 82:20 campaign [1] - 101:23 campaigns [1] -</p>				

<p>6:16, 7:9, 27:16, 41:14</p> <p>commenced [1] - 20:29</p> <p>commencement [1] - 7:6</p> <p>commencing [2] - 63:3, 86:15</p> <p>comment [1] - 11:8</p> <p>commentary [1] - 21:2</p> <p>comments [6] - 11:29, 12:3, 95:18, 99:29, 101:14, 109:16</p> <p>committed [3] - 19:8, 22:7, 82:9</p> <p>committing [1] - 82:16</p> <p>common [22] - 49:12, 50:19, 58:10, 61:23, 85:2, 93:19, 102:7, 105:25, 106:15, 106:29, 107:21, 107:24, 109:2, 109:22, 109:27, 110:11, 114:8, 114:10, 114:15, 114:24, 117:1</p> <p>commonly [1] - 76:27</p> <p>commonplace [1] - 98:6</p> <p>communicated [1] - 8:3</p> <p>communication [2] - 14:20, 19:1</p> <p>communications [1] - 17:11</p> <p>Community [1] - 113:26</p> <p>community [3] - 62:6, 66:24, 113:17</p> <p>company [1] - 112:10</p> <p>compared [1] - 101:25</p> <p>comparison [2] - 93:3, 93:4</p> <p>compelling [1] - 111:20</p> <p>compellingly [1] - 108:20</p> <p>competence [1] - 92:2</p> <p>competing [1] - 117:19</p> <p>complete [1] - 36:6</p> <p>completed [7] - 10:19, 12:2, 12:12, 12:29, 40:21, 41:1, 42:8</p>	<p>completely [1] - 51:24</p> <p>completion [1] - 17:19</p> <p>complex [1] - 26:19</p> <p>complexity [1] - 13:21</p> <p>compliant [1] - 86:23</p> <p>comply [1] - 29:28</p> <p>component [1] - 59:7</p> <p>comprehensive [7] - 5:13, 7:23, 30:14, 30:21, 35:7, 35:16, 38:21</p> <p>comprising [1] - 26:22</p> <p>concealed [1] - 51:22</p> <p>concern [7] - 31:9, 38:6, 44:28, 44:29, 54:13, 117:25, 117:29</p> <p>concerned [4] - 19:28, 29:3, 32:3, 59:18</p> <p>concerning [3] - 33:7, 43:19, 43:20</p> <p>concerns [3] - 41:22, 108:21, 114:24</p> <p>concise [1] - 102:18</p> <p>conclude [6] - 17:21, 29:23, 31:19, 85:26, 86:2, 94:24</p> <p>concluded [1] - 16:7</p> <p>concludes [2] - 22:11, 91:21</p> <p>concluding [1] - 25:6</p> <p>conclusion [4] - 26:15, 89:2, 92:28, 94:29</p> <p>condition [1] - 79:24</p> <p>conductive [1] - 40:26</p> <p>conduct [1] - 7:27</p> <p>conducted [4] - 28:29, 30:13, 31:13, 87:28</p> <p>confidence [1] - 115:20</p> <p>Confidentiality [1] - 54:29</p> <p>confined [1] - 10:29</p> <p>confirming [1] - 62:4</p> <p>confirms [1] - 54:3</p> <p>confused [1] - 99:8</p> <p>confusion [2] - 10:28, 100:1</p> <p>connected [1] - 68:27</p> <p>connection [1] - 13:12</p>	<p>conscious [5] - 73:7, 73:14, 112:5, 112:27, 119:13</p> <p>consequence [3] - 61:13, 83:16, 98:8</p> <p>consequences [3] - 51:16, 104:26, 105:8</p> <p>consider [16] - 2:10, 5:3, 8:23, 14:1, 24:23, 31:4, 31:6, 32:4, 49:9, 49:24, 60:7, 72:27, 87:17, 108:17, 109:24, 118:4</p> <p>considerable [2] - 17:22, 26:29</p> <p>consideration [4] - 2:14, 50:12, 54:9, 109:2</p> <p>consideration.. [1] - 117:20</p> <p>considerations [3] - 108:7, 108:24, 118:28</p> <p>considered [10] - 8:20, 25:29, 52:26, 75:16, 97:8, 98:27, 107:18, 116:3, 118:10, 119:1</p> <p>considering [2] - 10:13, 49:28</p> <p>considers [1] - 51:2</p> <p>consisted [1] - 60:18</p> <p>consistent [1] - 61:5</p> <p>consisting [1] - 62:19</p> <p>Constable [11] - 64:3, 64:9, 64:24, 64:29, 66:12, 66:13, 66:26, 66:28, 67:26, 67:27</p> <p>Constables [1] - 80:1</p> <p>constant [1] - 51:23</p> <p>constraints [1] - 41:11</p> <p>constructive [6] - 16:26, 27:9, 27:14, 27:19, 29:25, 37:15</p> <p>constructively [1] - 13:26</p> <p>consultation [3] - 23:16, 23:21, 24:3</p> <p>consuming [1] - 26:19</p> <p>contained [2] - 29:2, 58:12</p> <p>contains [7] - 18:5, 18:7, 18:14, 52:1, 57:6, 74:24, 86:28</p> <p>content [6] - 12:5, 23:22, 37:3, 48:28, 112:25, 113:5</p>	<p>contentious [1] - 4:14</p> <p>context [29] - 15:21, 50:24, 50:28, 51:4, 52:2, 52:3, 52:8, 53:5, 57:26, 58:8, 59:10, 79:12, 84:19, 95:25, 96:13, 96:15, 96:26, 97:25, 101:23, 103:7, 103:15, 109:2, 110:17, 110:21, 114:4, 115:25, 117:5, 119:2, 119:6</p> <p>contingencies [1] - 101:3</p> <p>continue [4] - 22:8, 22:13, 28:22, 29:21</p> <p>CONTINUED [2] - 43:11, 121:6</p> <p>continued [5] - 52:21, 70:12, 100:15, 108:23, 116:18</p> <p>continued.. [1] - 21:24</p> <p>continues [11] - 19:13, 20:10, 22:23, 23:2, 28:19, 45:16, 52:24, 60:22, 84:9, 89:18, 98:25</p> <p>Continues [1] - 21:26</p> <p>continuing [9] - 17:1, 23:6, 52:13, 59:9, 84:29, 89:5, 100:27, 101:11, 106:22</p> <p>Continuity [1] - 64:14</p> <p>continuous [1] - 101:4</p> <p>contrasts [1] - 77:5</p> <p>contribute [1] - 28:17</p> <p>contribution [3] - 22:19, 23:7, 37:4</p> <p>controversial [2] - 80:18, 101:8</p> <p>controversy [2] - 58:4, 107:25</p> <p>convenient [3] - 4:11, 31:21, 119:28</p> <p>Convention [1] - 49:14</p> <p>conversely [1] - 34:20</p> <p>conveying [1] - 99:2</p> <p>convicted [3] - 61:28, 82:8, 82:12</p> <p>convoy [1] - 69:4</p> <p>copies [4] - 20:20, 25:24, 25:26, 39:28</p>	<p>copy [5] - 20:28, 63:8, 63:9, 99:29</p> <p>core [3] - 12:8, 81:28, 107:26</p> <p>Core [65] - 2:7, 2:10, 2:18, 3:9, 4:9, 6:11, 7:5, 8:3, 8:22, 9:27, 10:24, 11:7, 11:11, 11:13, 11:22, 11:28, 12:3, 12:14, 12:25, 13:2, 13:27, 13:29, 14:12, 16:2, 16:9, 16:12, 16:20, 23:5, 23:25, 24:18, 24:24, 24:28, 25:13, 25:26, 26:9, 26:17, 26:21, 27:24, 29:12, 33:13, 33:19, 34:6, 35:14, 37:8, 39:1, 39:24, 42:3, 42:23, 42:27, 48:4, 53:23, 53:25, 54:24, 54:28, 86:5, 86:7, 86:25, 87:3, 88:4, 94:1, 94:6, 113:22, 118:7, 119:4, 119:21</p> <p>coroner [1] - 63:14</p> <p>Coroner [1] - 53:1</p> <p>Coroner's [1] - 104:4</p> <p>Coroners [1] - 95:29</p> <p>corporate [2] - 29:1, 55:6</p> <p>correct [6] - 47:11, 65:6, 73:11, 99:19, 109:27, 111:9</p> <p>corrected [1] - 47:2</p> <p>correction [2] - 31:7, 38:8</p> <p>correspondence [2] - 38:7, 42:4</p> <p>counsel [6] - 32:10, 53:14, 55:25, 56:1, 56:18, 98:2</p> <p>Counsel [1] - 45:12</p> <p>counter [1] - 116:21</p> <p>countering [1] - 116:23</p> <p>counts [2] - 82:13, 82:14</p> <p>County [2] - 65:27, 67:21</p> <p>couple [5] - 44:17, 74:22, 78:20, 103:23, 110:28</p> <p>coupled [1] - 93:6</p> <p>course [35] - 1:19, 6:22, 8:23, 13:24, 15:29, 26:9, 27:1, 28:14, 31:7, 31:16, 34:21, 36:9, 37:5, 38:8, 43:23, 44:29,</p>
--	---	---	--	---

<p>46:10, 46:14, 47:22, 56:21, 57:17, 57:29, 58:24, 61:22, 67:11, 72:27, 76:26, 79:7, 84:25, 86:12, 87:18, 95:7, 105:1, 107:4, 116:6</p> <p>court [17] - 43:17, 68:18, 84:10, 95:6, 95:29, 99:1, 100:5, 100:28, 101:7, 102:8, 105:27, 107:4, 109:22, 110:15, 115:22, 116:3, 116:7</p> <p>Court [14] - 1:24, 51:29, 52:5, 60:5, 96:2, 96:28, 97:11, 98:12, 99:3, 102:13, 102:25, 109:26, 115:4, 115:8</p> <p>courthouse [1] - 76:2</p> <p>courtroom [1] - 76:28</p> <p>courtrooms [1] - 97:28</p> <p>cover [3] - 58:2, 113:29, 118:16</p> <p>coverage [1] - 89:8</p> <p>covered [5] - 112:27, 112:28, 112:29, 113:1, 119:25</p> <p>covering [3] - 69:16, 92:20, 93:9</p> <p>covers [1] - 92:25</p> <p>CP's [2] - 110:3, 111:25</p> <p>CPs [5] - 19:4, 19:10, 21:14, 86:29, 111:24</p> <p>cracks [1] - 37:29</p> <p>create [3] - 12:16, 36:29, 107:13</p> <p>created [1] - 26:7</p> <p>creates [2] - 59:13, 91:16</p> <p>creation [1] - 12:27</p> <p>Creggan [1] - 75:1</p> <p>criminal [2] - 77:16, 98:1</p> <p>critical [1] - 79:24</p> <p>criticism [1] - 80:19</p> <p>crosshairs [1] - 81:8</p> <p>crossover [1] - 102:6</p> <p>crude [1] - 74:17</p> <p>Crumlin [2] - 69:4, 71:7</p> <p>current [6] - 4:20, 23:13, 24:10, 40:29, 113:26</p>	<p style="text-align: center;">D</p> <p>daily [1] - 119:17</p> <p>damage [11] - 34:10, 53:27, 54:1, 54:2, 54:15, 54:27, 55:10, 113:16, 116:23, 117:27, 119:8</p> <p>Damian [2] - 61:27, 82:7</p> <p>danger [2] - 118:24, 119:1</p> <p>data [2] - 26:1, 87:1</p> <p>database [3] - 21:22, 26:8, 26:9</p> <p>databases [1] - 90:2</p> <p>date [27] - 4:6, 6:25, 7:6, 7:7, 7:16, 8:4, 8:8, 8:25, 9:9, 13:4, 13:7, 16:10, 17:10, 20:15, 27:26, 32:27, 33:14, 69:17, 72:6, 72:7, 74:12, 74:24, 75:12, 76:13, 78:4, 80:21, 81:19</p> <p>dated [2] - 104:8, 104:12</p> <p>David [2] - 67:15, 68:4</p> <p>days [2] - 9:13, 64:11</p> <p>deactivate [1] - 3:25</p> <p>dead [1] - 64:11</p> <p>deadlines [3] - 17:12, 30:22, 30:27</p> <p>deal [13] - 2:5, 3:28, 4:3, 4:12, 4:20, 27:19, 70:16, 77:9, 92:21, 92:22, 93:27, 117:28, 119:21</p> <p>dealing [11] - 3:3, 6:10, 17:10, 42:9, 47:27, 58:16, 83:18, 85:4, 102:29, 104:22, 111:29</p> <p>dealings [1] - 114:9</p> <p>deals [1] - 71:11</p> <p>dealt [8] - 3:14, 17:8, 48:10, 55:12, 117:29, 118:5, 118:10, 118:26</p> <p>death [5] - 59:20, 64:15, 83:12, 104:9, 110:20</p> <p>deaths [1] - 84:5</p> <p>decades [1] - 52:9</p> <p>deceased [1] - 64:24</p> <p>December [1] - 69:5</p> <p>decide [3] - 58:25, 58:29, 59:12</p> <p>decided [1] - 52:16</p> <p>deciphered [1] -</p>	<p>25:28</p> <p>decision [25] - 16:4, 52:29, 57:25, 58:21, 58:27, 59:24, 84:17, 95:8, 95:17, 97:11, 98:15, 99:13, 100:6, 102:21, 104:3, 104:5, 104:8, 105:16, 107:6, 108:11, 108:29, 110:6, 110:26, 115:4, 116:27</p> <p>decision-maker [3] - 57:25, 58:21, 100:6</p> <p>decisions [6] - 94:9, 96:3, 96:7, 103:21, 110:17, 113:22</p> <p>dedicated [1] - 1:27</p> <p>Deeny [3] - 104:11, 107:5, 107:10</p> <p>deepened [1] - 44:29</p> <p>deeper [1] - 44:1</p> <p>defence [2] - 76:22, 83:2</p> <p>Defence [1] - 12:19</p> <p>defendants [1] - 82:7</p> <p>defined [2] - 33:26, 35:25</p> <p>definitely [1] - 84:29</p> <p>definition [1] - 119:16</p> <p>degree [6] - 27:6, 27:10, 37:19, 90:29, 108:22, 115:21</p> <p>delay [10] - 1:14, 1:17, 5:28, 32:16, 38:1, 41:3, 45:18, 45:25, 46:6, 114:12</p> <p>delayed [1] - 1:19</p> <p>deliberately [2] - 95:26, 112:7</p> <p>delivered [1] - 105:13</p> <p>democratic [1] - 115:19</p> <p>demonstrate [2] - 96:12, 108:20</p> <p>demoralising [1] - 60:17</p> <p>denied [1] - 91:6</p> <p>deny [2] - 68:28, 68:29</p> <p>department [2] - 39:23, 42:6</p> <p>dependent [1] - 91:24</p> <p>deployed [2] - 74:17, 82:25</p> <p>deployment [1] - 74:4</p> <p>deprived [1] - 93:21</p> <p>deputy [2] - 28:23,</p>	<p>55:7</p> <p>derogations [2] - 106:5, 106:6</p> <p>Derry [2] - 75:1, 76:3</p> <p>Derry/Londonderry [1] - 71:3</p> <p>descend [1] - 38:4</p> <p>descending [1] - 31:3</p> <p>describe [3] - 57:10, 72:16, 79:23</p> <p>described [14] - 10:18, 13:15, 13:29, 23:21, 45:24, 53:6, 61:8, 65:24, 73:29, 74:25, 84:5, 84:29, 95:20, 96:27</p> <p>describes [1] - 62:1</p> <p>describing [2] - 71:28, 89:14</p> <p>description [5] - 70:29, 74:15, 80:6, 83:1</p> <p>designated [1] - 2:2</p> <p>designations [2] - 113:29, 118:16</p> <p>designed [1] - 36:28</p> <p>despite [2] - 39:10, 40:1</p> <p>detail [17] - 25:6, 27:22, 27:23, 38:5, 42:10, 49:21, 55:12, 68:23, 69:15, 70:5, 76:20, 76:21, 81:28, 93:24, 117:8, 119:9, 119:22</p> <p>detailed [2] - 31:12, 113:11</p> <p>details [11] - 65:16, 66:1, 67:3, 72:18, 76:16, 78:6, 78:13, 78:14, 89:29, 90:7, 111:23</p> <p>detect [1] - 49:17</p> <p>detected [1] - 10:14</p> <p>Detective [7] - 28:19, 61:25, 67:8, 79:16, 80:13, 80:24, 86:20</p> <p>detective [1] - 79:6</p> <p>determination [1] - 7:29</p> <p>determine [1] - 112:23</p> <p>determined [1] - 35:19</p> <p>determining [1] - 53:3</p> <p>deterred [1] - 10:14</p> <p>detonated [1] - 71:24</p> <p>detrimental [1] - 61:16</p>	<p>develop [1] - 51:2</p> <p>developed [2] - 18:27, 40:14</p> <p>developing [2] - 22:7, 42:12</p> <p>develops [1] - 11:16</p> <p>device [8] - 71:16, 71:17, 71:24, 72:12, 72:22, 74:4, 74:5, 74:17</p> <p>dialogue [1] - 26:12</p> <p>died [1] - 66:28</p> <p>difference [2] - 49:18, 112:3</p> <p>differences [1] - 97:26</p> <p>different [25] - 36:22, 50:29, 57:23, 61:1, 61:2, 62:18, 64:19, 66:11, 70:6, 70:26, 73:1, 73:9, 73:11, 73:12, 93:10, 96:8, 96:28, 97:23, 98:8, 99:22, 100:4, 115:25, 119:2, 119:5</p> <p>difficult [5] - 29:27, 38:10, 57:24, 104:29, 105:2</p> <p>difficulties [4] - 5:26, 61:6, 61:9, 109:18</p> <p>digested [1] - 12:9</p> <p>digital [4] - 39:27, 39:29, 40:2, 40:3</p> <p>digitally [2] - 20:2, 37:22</p> <p>direct [4] - 19:1, 60:24, 67:7, 67:16</p> <p>directed [3] - 6:14, 6:25, 52:12</p> <p>direction [1] - 68:28</p> <p>direction [1] - 6:17</p> <p>directions [3] - 14:17, 14:23, 113:22</p> <p>directly [4] - 5:10, 10:1, 23:27, 34:23</p> <p>director [1] - 55:7</p> <p>disagree [2] - 95:3, 111:19</p> <p>disappointed [1] - 7:20</p> <p>disappointing [2] - 7:18, 47:12</p> <p>discharge [3] - 7:28, 33:22, 66:12</p> <p>discharges [1] - 83:24</p> <p>disclose [1] - 15:28</p> <p>disclosed [21] - 8:17, 8:18, 16:8, 16:17, 16:20, 21:3, 23:5, 25:13, 26:16, 26:23,</p>
--	--	---	---	--

<p>29:9, 29:11, 33:26, 35:11, 36:16, 36:21, 111:23, 111:24, 112:7, 115:27</p> <p>disclosing [1] - 23:1</p> <p>disclosure [41] - 4:21, 6:27, 8:15, 10:18, 16:1, 16:21, 16:25, 17:19, 18:3, 18:19, 19:6, 19:21, 19:23, 19:24, 19:27, 20:6, 20:14, 20:17, 22:9, 22:18, 22:27, 23:3, 25:3, 25:10, 25:11, 26:21, 27:11, 27:18, 27:20, 27:26, 29:24, 30:8, 32:24, 34:10, 37:18, 38:3, 54:28, 116:4, 116:20, 116:22, 118:21</p> <p>discovered [1] - 72:12</p> <p>discrete [1] - 95:23</p> <p>discrimination [1] - 80:11</p> <p>discuss [3] - 19:2, 20:1, 61:22</p> <p>discussing [1] - 68:19</p> <p>discussion [2] - 16:22, 68:14</p> <p>discussions [2] - 21:24, 42:4</p> <p>dismissed [1] - 102:3</p> <p>dispels [1] - 92:11</p> <p>disputed [1] - 66:2</p> <p>disrupted [1] - 10:14</p> <p>dissident [22] - 54:6, 64:10, 64:19, 65:18, 67:29, 70:6, 70:25, 71:23, 75:9, 75:15, 81:22, 84:26, 87:28, 88:22, 88:28, 89:8, 89:10, 89:20, 90:4, 90:17, 98:21, 105:3</p> <p>Dissident [1] - 73:22</p> <p>distance [1] - 88:17</p> <p>distinguishes [1] - 77:19</p> <p>distracting [1] - 3:27</p> <p>disturbances [1] - 51:15</p> <p>divide [1] - 9:5</p> <p>divided [1] - 62:25</p> <p>document [12] - 25:25, 25:26, 26:7, 64:7, 69:9, 69:18, 73:19, 83:9, 86:18, 86:28, 88:20, 111:16</p> <p>documentaries [1] -</p>	<p>28:4</p> <p>documents [21] - 20:16, 20:18, 20:21, 21:1, 25:20, 25:29, 26:16, 26:23, 35:6, 35:8, 35:9, 35:22, 35:26, 36:3, 36:10, 36:20, 37:1, 48:26, 48:29, 51:22, 113:18</p> <p>domain [3] - 19:27, 54:4, 88:28</p> <p>done [2] - 2:28, 3:20</p> <p>doubt [2] - 42:1, 57:28</p> <p>down [9] - 15:2, 64:20, 65:23, 70:10, 70:18, 74:22, 79:23, 93:9, 98:12</p> <p>downstairs [1] - 44:21</p> <p>Dr [1] - 12:2</p> <p>draft [3] - 11:27, 13:1, 13:5</p> <p>drafting [1] - 99:16</p> <p>drafts [1] - 11:15</p> <p>draw [12] - 12:12, 29:17, 54:23, 70:5, 98:17, 101:17, 105:10, 105:18, 115:1, 116:26, 117:15, 118:2</p> <p>drawing [2] - 109:21, 110:28</p> <p>drawn [5] - 12:23, 32:1, 76:20, 92:5, 115:29</p> <p>drive [2] - 14:17, 89:26</p> <p>driveway [4] - 81:23, 82:21, 82:22, 82:25</p> <p>driving [1] - 67:19</p> <p>drop [1] - 88:16</p> <p>drove [1] - 71:17</p> <p>due [20] - 8:8, 16:5, 30:20, 32:16, 33:24, 41:14, 45:18, 57:17, 57:29, 58:24, 61:22, 67:11, 72:27, 76:26, 87:18, 88:13, 89:8, 95:7, 107:3, 115:21</p> <p>Duffy [2] - 61:27, 82:7</p> <p>Dungiven [2] - 74:13, 74:19</p> <p>duplication [3] - 10:28, 25:23, 114:12</p> <p>duration [2] - 7:10, 9:12</p> <p>during [14] - 9:26, 11:3, 13:13, 15:9, 15:10, 43:23, 46:10,</p>	<p>46:14, 47:22, 64:10, 70:22, 71:18, 79:7, 105:1</p> <p>duties [2] - 66:12, 83:24</p> <p>duty [14] - 7:27, 34:28, 49:12, 58:17, 58:20, 64:12, 72:12, 74:18, 83:20, 105:29, 106:1</p>	<p>E</p>	<p>earliest [1] - 9:9</p> <p>early [6] - 14:17, 16:24, 27:17, 40:18, 60:16, 113:22</p> <p>ease [1] - 108:25</p> <p>easier [1] - 100:8</p> <p>easily [1] - 99:27</p> <p>East [1] - 72:13</p> <p>echo [1] - 117:2</p> <p>effect [9] - 1:13, 6:16, 19:2, 60:17, 61:11, 61:17, 62:15, 109:14, 109:17</p> <p>effective [1] - 17:23</p> <p>effectively [2] - 30:26, 45:23</p> <p>effects [2] - 93:18, 93:19</p> <p>efficiencies [1] - 22:4</p> <p>efficient [8] - 17:12, 22:1, 27:8, 27:13, 27:18, 29:25, 37:15, 40:26</p> <p>efficiently [1] - 39:3</p> <p>efforts [3] - 17:22, 17:25, 29:22</p> <p>either [6] - 18:4, 44:20, 48:28, 59:13, 105:24, 107:13</p> <p>electronic [3] - 12:11, 28:28, 90:1</p> <p>element [1] - 29:16</p> <p>elements [2] - 89:28, 90:22</p> <p>emanated [1] - 103:23</p> <p>emanates [2] - 46:28, 103:11</p> <p>emanating [1] - 96:7</p> <p>emphasis [3] - 90:22, 90:27, 98:17</p> <p>emphasise [2] - 28:2, 89:24</p> <p>emphasised [1] - 12:8</p> <p>employment [1] - 68:1</p>	<p>enable [1] - 5:4</p> <p>enabling [1] - 49:4</p> <p>encourage [1] - 88:16</p> <p>end [12] - 4:11, 6:24, 11:12, 41:2, 41:14, 42:19, 65:1, 93:8, 96:10, 99:17, 99:20</p> <p>endanger [1] - 69:2</p> <p>endorse [1] - 95:11</p> <p>ends [1] - 22:5</p> <p>engage [3] - 28:19, 28:23, 109:18</p> <p>engaged [12] - 5:3, 12:15, 50:7, 58:19, 58:25, 59:18, 83:12, 85:1, 95:11, 105:25, 106:1, 116:13</p> <p>engagement [2] - 11:22, 37:15</p> <p>Enniskillen [1] - 74:3</p> <p>Enniskillen" [1] - 73:29</p> <p>ensure [7] - 5:11, 8:5, 11:9, 11:13, 19:6, 30:3, 42:13</p> <p>ensures [1] - 40:5</p> <p>ensuring [2] - 30:10, 30:13</p> <p>entire [2] - 84:8, 108:22</p> <p>entirely [5] - 9:10, 33:4, 33:9, 34:25, 47:24</p> <p>entitled [6] - 24:4, 69:9, 94:17, 94:18, 94:26, 94:28</p> <p>entries [2] - 63:23, 76:21</p> <p>entry [1] - 76:6</p> <p>environment [2] - 41:16, 118:29</p> <p>environments [1] - 40:12</p> <p>envisages [1] - 114:7</p> <p>EPE [2] - 12:12, 12:14</p> <p>equities [1] - 18:14</p> <p>equity [1] - 18:3</p> <p>error [3] - 45:7, 47:11, 99:15</p> <p>escaped [1] - 71:15</p> <p>essential [1] - 38:21</p> <p>establish [1] - 36:19</p> <p>established [6] - 9:6, 9:18, 9:23, 36:10, 49:4, 50:13</p> <p>establishing [1] - 6:20</p> <p>estimate [2] - 9:17,</p>	<p>113:2</p> <p>estimation [2] - 10:27, 13:5</p> <p>evacuation [2] - 13:18, 15:8</p> <p>evening [1] - 85:27</p> <p>event [2] - 16:4, 43:28</p> <p>events [4] - 15:21, 27:29, 57:22, 104:25</p> <p>evidence [59] - 6:15, 6:19, 7:8, 9:15, 10:25, 11:6, 11:9, 11:14, 11:23, 12:9, 12:11, 12:21, 14:8, 15:1, 15:10, 23:11, 24:11, 24:16, 27:3, 27:17, 29:18, 29:23, 34:3, 34:23, 48:12, 48:13, 54:27, 55:9, 57:5, 57:10, 57:17, 58:5, 59:11, 59:13, 59:23, 59:29, 66:24, 84:25, 91:13, 91:16, 91:18, 91:19, 92:16, 93:21, 100:17, 101:2, 101:8, 101:25, 104:18, 105:21, 107:3, 107:12, 107:15, 107:19, 109:12, 109:24, 111:10, 111:19</p> <p>evidence.. [2] - 99:5, 100:19</p> <p>evidenced [1] - 84:26</p> <p>evident [1] - 80:5</p> <p>evidential [3] - 14:28, 29:14, 95:27</p> <p>evidently [1] - 21:12</p> <p>exactly [1] - 97:24</p> <p>examination [1] - 57:21</p> <p>examined [1] - 10:23</p> <p>example [1] - 117:29</p> <p>examples [3] - 20:4, 26:26, 90:25</p> <p>exception [1] - 35:2</p> <p>excess [2] - 16:17, 26:22</p> <p>exchange [3] - 43:22, 43:26, 46:22</p> <p>exchanges [1] - 20:22</p> <p>excluded [1] - 34:20</p> <p>exclusive [1] - 41:15</p> <p>exclusively [1] - 108:27</p> <p>exercise [7] - 16:21, 57:22, 57:23, 108:3, 108:8, 117:22, 118:25</p>
---	---	---	-----------------	--	---	---

<p>exercised [1] - 96:27 exhibits [1] - 53:20 exist [2] - 20:3, 84:9 existed [1] - 84:8 existence [1] - 98:6 existing [2] - 23:18, 91:15 exists [1] - 81:11 expect [3] - 3:2, 39:2, 86:29 expectation [1] - 24:17 expected [2] - 16:7, 17:20 expected.. [1] - 19:11 expecting [1] - 22:20 experience [1] - 17:9 experienced [4] - 18:13, 60:15, 61:6, 62:14 experiences [1] - 93:16 expert [1] - 12:2 expertise [1] - 92:4 experts [3] - 11:22, 11:23, 12:16 explain [4] - 20:27, 44:27, 44:28, 54:26 explained [5] - 11:5, 21:5, 46:14, 107:29, 115:9 explanation [1] - 87:8 exploded [2] - 66:5, 71:17 exploding [1] - 65:25 explored [2] - 33:26, 114:3 explosion [1] - 67:4 explosive [4] - 71:15, 74:4, 74:5, 74:17 express [1] - 24:24 expressed [4] - 16:27, 33:4, 43:23, 49:18 expressly [1] - 119:5 extensions [1] - 30:24 extensive [2] - 16:22, 89:8 extent [12] - 3:5, 14:6, 14:26, 15:9, 47:17, 51:2, 54:26, 55:22, 62:8, 109:29, 111:27, 118:8 extraction [1] - 87:1 extremely [3] - 14:19, 47:20, 114:12</p>	<p style="text-align: center;">F</p> <p>face [4] - 16:23, 68:26, 102:1 face-to-face [1] - 16:23 faced [1] - 61:9 facilitating [1] - 114:2 facilities [5] - 5:9, 5:10, 5:17, 38:28, 39:8 facility [4] - 21:16, 40:21, 41:1, 42:18 fact [11] - 16:6, 32:19, 36:21, 40:1, 51:21, 88:13, 94:24, 98:6, 114:21, 115:2, 119:10 fact-specific [1] - 114:21 factors [1] - 117:19 facts [1] - 97:8 factual [5] - 11:6, 50:28, 95:28, 96:15, 97:25 failed [3] - 68:20, 71:16, 74:19 fair [1] - 55:25 fairly [1] - 25:18 fairness [6] - 49:12, 107:22, 107:26, 107:27, 108:4 fall [3] - 36:10, 37:29, 109:28 falling [1] - 35:22 familiar [1] - 25:14 families [6] - 1:28, 34:22, 51:23, 55:20, 75:9, 118:3 family [9] - 3:9, 13:2, 37:8, 54:13, 55:24, 61:17, 62:12, 73:7, 86:7 fanciful [6] - 52:26, 59:2, 98:27, 101:11, 102:3, 106:18 far [12] - 6:20, 22:19, 25:11, 34:14, 36:14, 41:8, 53:9, 54:11, 79:29, 89:2, 90:25, 112:20 fashion [1] - 33:7 fatal [3] - 64:18, 90:26, 92:14 father [1] - 64:24 fault [1] - 46:1 favour [1] - 109:28 feat [10] - 51:25, 62:8, 93:20, 108:23,</p>	<p>109:11, 110:10, 110:19, 111:2, 111:6, 111:16 fearless [1] - 7:27 fears [5] - 61:21, 108:1, 108:9, 108:14, 110:20 feasible [1] - 8:26 feature [2] - 54:23, 76:27 February [5] - 20:21, 21:28, 48:23, 49:8, 71:11 fed [1] - 12:4 FEE [5] - 112:26, 113:6, 113:9, 113:11, 121:9 Fee [7] - 55:19, 57:29, 86:4, 112:19, 112:22, 112:24, 119:26 feed [2] - 1:19, 5:27 fellow [1] - 47:16 fevered [1] - 102:4 few [3] - 41:8, 47:1, 103:14 field [1] - 12:16 fifth [4] - 5:7, 38:24, 38:26, 42:9 figures [4] - 25:5, 25:9, 28:11, 28:15 final [9] - 27:19, 38:24, 38:26, 67:6, 74:27, 76:22, 88:19, 91:3, 105:10 finalise [1] - 12:28 finalising [1] - 11:26 finally [6] - 5:7, 13:9, 55:27, 58:11, 59:17, 91:21 findings [2] - 84:23, 106:12 finish [1] - 112:22 finished [1] - 2:11 fire [1] - 74:7 firearm [1] - 74:6 fired [4] - 67:20, 71:9, 74:3, 74:29 firm [1] - 43:24 first [54] - 1:11, 1:23, 2:6, 2:22, 4:3, 4:7, 5:7, 6:10, 6:12, 7:7, 7:14, 8:28, 10:3, 11:10, 11:15, 11:27, 13:9, 15:22, 22:27, 27:3, 28:4, 37:5, 37:7, 48:16, 49:1, 55:18, 56:5, 57:8, 57:12, 58:15, 58:24, 59:7, 60:8, 63:4, 63:11, 63:26, 69:8, 70:7,</p>	<p>70:29, 73:27, 74:10, 80:22, 81:19, 82:6, 83:10, 90:22, 95:27, 101:11, 101:17, 105:19, 107:6, 108:16, 112:24 firstly [6] - 23:25, 58:3, 92:24, 94:2, 103:18, 109:11 Fitzsimmons [1] - 68:29 five [22] - 4:7, 6:10, 33:15, 53:17, 55:1, 56:26, 57:3, 60:8, 60:10, 60:29, 61:1, 61:2, 61:4, 61:9, 92:12, 92:25, 93:22, 93:24, 100:11, 108:15, 109:26, 111:2 flag [1] - 86:19 flanked [1] - 77:13 flavour [2] - 71:27, 71:28 fluid [1] - 101:22 focus [10] - 4:23, 9:28, 10:2, 10:11, 10:12, 10:17, 11:2, 25:7, 62:29 focused [1] - 23:1 folding [1] - 3:18 follow [4] - 10:4, 38:19, 63:19, 110:26 following [15] - 18:22, 24:3, 24:20, 36:11, 41:22, 49:25, 52:6, 55:24, 58:2, 58:26, 64:27, 69:15, 92:1, 105:24, 113:14 follows [5] - 2:22, 84:23, 92:24, 94:2, 104:5 FOLLOWS [5] - 1:2, 6:6, 31:26, 43:12, 85:20 Footage [1] - 77:27 football [1] - 79:17 force [4] - 52:23, 56:18, 98:24, 103:9 forces [4] - 70:14, 78:6, 87:21, 97:18 forefront [2] - 22:3, 50:3 forensic [1] - 11:25 forgive [1] - 96:21 form [3] - 10:3, 11:7, 29:15 formalities [1] - 86:28 formality [1] - 87:7 format [1] - 87:9 formed [2] - 4:12,</p>	<p>18:29 former [39] - 24:9, 24:10, 24:11, 53:17, 54:3, 55:1, 56:27, 57:2, 62:5, 65:8, 65:13, 65:18, 72:29, 73:15, 83:29, 84:20, 87:22, 88:9, 88:26, 89:4, 89:16, 90:17, 90:18, 90:23, 91:5, 91:19, 92:20, 92:26, 93:1, 97:1, 97:17, 102:28, 102:29, 105:15, 105:16, 107:2, 107:28, 111:17, 113:26 formulated [1] - 114:19 forth [3] - 73:7, 87:5, 106:8 forward [5] - 5:12, 21:28, 65:10, 68:10, 75:4 forwards [1] - 63:22 founded [2] - 108:18, 108:21 four [8] - 7:10, 9:13, 9:16, 50:16, 60:10, 61:9, 64:21, 70:6 fourth [8] - 4:28, 9:2, 33:15, 50:21, 55:22, 65:23, 74:1, 75:21 Fox [9] - 13:27, 14:3, 14:20, 58:13, 110:3, 110:13, 110:29, 111:8, 111:15 frame [1] - 82:9 framework [6] - 15:27, 23:17, 24:12, 35:7, 35:16, 50:19 free [1] - 51:24 frequent [1] - 29:29 frequently [4] - 88:13, 98:9, 102:28, 103:12 fresh [1] - 18:24 FRIDAY [1] - 120:6 friends [5] - 51:21, 61:16, 112:15, 117:3, 119:25 front [3] - 57:21, 66:18, 78:22 fulfilling [1] - 109:7 full [2] - 7:27, 54:8 fuller [1] - 15:17 fully [2] - 43:25, 51:3 Fulton [1] - 28:10 function [2] - 71:17, 74:19 fundamental [1] - 49:27</p>
--	---	--	---	---

<p>fundamentally ^[1] - 111:19</p> <p>furthering ^[1] - 116:19</p> <p>furthermore ^[7] - 8:21, 8:28, 25:28, 29:11, 39:5, 52:29, 54:22</p> <p>future ^[1] - 50:11</p>	<p>Granaghan ^[1] - 72:16</p> <p>grandfather ^[1] - 64:25</p> <p>grant ^[4] - 95:9, 106:3, 109:5, 110:9</p> <p>granted ^[10] - 48:7, 88:7, 88:9, 88:13, 98:10, 102:28, 106:4, 107:15, 109:14, 109:19</p> <p>granting ^[1] - 109:28</p> <p>grateful ^[8] - 14:19, 17:25, 17:26, 20:24, 22:13, 41:25, 111:12, 112:16</p> <p>Greaney ^[23] - 1:4, 6:8, 31:29, 43:6, 43:14, 44:2, 45:13, 47:13, 56:9, 56:16, 56:25, 57:5, 57:13, 59:25, 85:10, 85:23, 86:10, 91:28, 96:22, 97:21, 98:15, 112:29, 119:27</p> <p>GREANEY ^[25] - 1:7, 1:9, 3:24, 6:9, 32:1, 33:3, 33:9, 39:24, 42:7, 43:15, 44:4, 44:8, 44:11, 44:16, 47:24, 56:8, 63:9, 63:16, 69:22, 85:12, 85:24, 86:12, 112:19, 119:28, 121:4</p> <p>great ^[1] - 51:14</p> <p>greater ^[3] - 20:12, 22:4, 94:25</p> <p>ground ^[2] - 112:28, 119:24</p> <p>grounds ^[2] - 46:1, 102:1</p> <p>group ^[8] - 10:10, 33:27, 35:25, 75:9, 75:15, 75:20, 75:24, 103:11</p> <p>Group ^[1] - 13:27</p> <p>groupings ^[1] - 64:19</p> <p>groups ^[6] - 10:10, 54:14, 70:7, 70:12, 87:28, 116:18</p> <p>Guardian ^[1] - 110:23</p> <p>guards ^[1] - 77:14</p> <p>guidance ^[2] - 103:19, 110:25</p> <p>guilty ^[2] - 77:26, 82:3</p> <p>gun ^[2] - 68:27, 69:3</p> <p>gunmen ^[1] - 79:17</p>	<p style="text-align: center;">H</p> <p>habit ^[1] - 56:19</p> <p>half ^[6] - 25:11, 65:3, 66:6, 97:3, 98:18, 101:16</p> <p>hand ^[3] - 33:13, 56:6, 63:14</p> <p>handed ^[2] - 18:9, 18:16</p> <p>handling ^[1] - 18:10</p> <p>hands ^[3] - 8:22, 29:8, 113:2</p> <p>handwriting ^[1] - 25:28</p> <p>happy ^[1] - 113:4</p> <p>hard ^[7] - 20:20, 20:28, 29:27, 39:28, 63:8, 63:9</p> <p>hardly ^[1] - 103:10</p> <p>hardships ^[1] - 51:14</p> <p>harm ^[6] - 34:9, 34:18, 116:6, 117:26, 118:24, 118:29</p> <p>head ^[1] - 42:5</p> <p>headline ^[2] - 25:5, 25:9</p> <p>hear ^[11] - 2:28, 3:1, 3:2, 3:4, 3:8, 38:25, 56:22, 85:25, 112:23, 113:4</p> <p>heard ^[10] - 7:1, 9:15, 34:4, 37:7, 56:25, 86:4, 86:5, 90:25, 117:2, 117:8</p> <p>hearing ^[30] - 1:10, 1:12, 1:15, 1:17, 1:19, 1:23, 2:1, 2:5, 6:19, 9:16, 12:26, 14:15, 14:18, 16:5, 18:23, 24:23, 27:15, 31:12, 32:9, 32:22, 37:11, 42:26, 54:7, 60:1, 60:4, 78:18, 84:12, 85:26, 86:2, 96:20</p> <p>HEARING ^[8] - 6:5, 31:25, 43:11, 85:20, 120:5, 121:6, 121:8, 121:10</p> <p>hearings ^[12] - 5:16, 5:17, 6:15, 7:8, 15:1, 27:3, 27:17, 38:18, 38:19, 38:21, 45:10, 46:4</p> <p>hedge ^[1] - 82:21</p> <p>Heffron ^[3] - 65:9, 66:1, 67:27</p> <p>held ^[4] - 18:4, 18:6, 20:14, 40:6</p> <p>help ^[1] - 63:8</p> <p>helpful ^[7] - 38:4, 42:22, 54:19, 63:20, 91:29, 114:1, 115:28</p> <p>helpfully ^[6] - 56:17, 56:25, 57:4, 59:25, 96:22, 98:15</p> <p>helps ^[1] - 25:25</p> <p>Henry ^[19] - 51:1, 55:18, 56:5, 56:10, 62:22, 63:10, 69:26, 70:1, 77:4, 78:28, 85:12, 85:15, 86:14, 88:15, 99:7, 112:18, 112:27, 118:20</p> <p>HENRY ^[2] - 56:14, 121:7</p> <p>HENRY ^[36] - 56:16, 56:22, 56:24, 62:24, 62:28, 63:4, 63:17, 63:20, 64:5, 68:9, 69:14, 70:2, 72:4, 73:11, 73:26, 75:7, 76:29, 77:7, 79:1, 79:3, 86:17, 88:18, 94:26, 94:28, 95:3, 95:16, 99:10, 99:15, 99:24, 100:1, 100:5, 100:10, 100:14, 110:25, 111:6, 111:9</p> <p>Higgins ^[1] - 102:16</p> <p>high ^[6] - 37:19, 62:3, 77:15, 90:29, 93:3, 97:29</p> <p>higher ^[3] - 52:24, 98:26, 101:24</p> <p>highest ^[2] - 27:6, 27:10</p> <p>highlight ^[1] - 115:4</p> <p>highlighted ^[2] - 21:5, 98:19</p> <p>highly ^[4] - 40:4, 50:7, 90:17, 90:28</p> <p>himself ^[1] - 66:26</p> <p>hindsight ^[1] - 28:5</p> <p>historic ^[1] - 84:4</p> <p>HMG ^[18] - 2:16, 3:1, 26:24, 53:14, 55:4, 55:19, 55:25, 113:12, 113:21, 113:27, 114:7, 115:2, 117:9, 117:15, 118:17, 118:26, 119:4</p> <p>HMG's ^[6] - 114:29, 116:3, 116:29, 117:13, 117:28, 118:15</p> <p>hold ^[2] - 19:16, 66:24</p> <p>holders ^[1] - 24:9</p> <p>holds ^[2] - 25:9, 55:6</p> <p>HOLMES ^[1] - 28:27</p> <p>home ^[7] - 1:24, 51:18, 66:4, 67:5, 74:14, 82:25, 90:6</p> <p>Home ^[1] - 28:27</p> <p>homicidal ^[1] - 52:9</p> <p>hope ^[8] - 8:25, 18:12, 31:13, 32:25, 42:10, 42:22, 87:6, 101:14</p> <p>hoped ^[1] - 47:3</p> <p>hopefully ^[3] - 65:11, 66:17, 78:22</p> <p>Horner ^[3] - 95:15, 95:19, 106:12</p> <p>hosted ^[1] - 40:25</p> <p>hostile ^[1] - 34:17</p> <p>hour ^[1] - 42:29</p> <p>hours ^[2] - 45:1, 79:20</p> <p>huge ^[3] - 11:6, 61:16, 96:6</p> <p>Humphreys ^[4] - 53:1, 95:8, 105:13, 106:3</p> <p>husband ^[1] - 64:24</p> <p>hypothetical ^[1] - 14:8</p>	<p style="text-align: center;">I</p> <p>idea ^[1] - 39:27</p> <p>identical ^[1] - 37:17</p> <p>identified ^[11] - 9:8, 10:12, 12:20, 20:15, 30:25, 36:12, 37:1, 40:19, 54:13, 54:23, 98:16</p> <p>identifies ^[1] - 29:13</p> <p>identify ^[6] - 10:8, 29:22, 32:2, 89:15, 89:21, 90:5</p> <p>identifying ^[3] - 15:3, 29:18, 114:1</p> <p>identities ^[4] - 89:11, 116:20, 119:14, 119:17</p> <p>identity ^[5] - 48:11, 62:5, 62:8, 88:27, 89:4</p> <p>IED ^[1] - 74:13</p> <p>illustrate ^[1] - 84:3</p> <p>image ^[4] - 80:22, 81:4, 81:20, 81:29</p> <p>imagination ^[1] - 102:4</p> <p>immediate ^[12] - 51:19, 52:14, 52:25, 59:1, 59:8, 85:8, 98:26, 99:2, 101:10, 106:22, 107:12</p> <p>immediately ^[2] - 70:4, 113:14</p>
--	--	---	--

<p>impact [5] - 19:26, 39:14, 58:9, 61:16, 61:20</p> <p>impede [1] - 109:7</p> <p>imperative [2] - 30:11, 97:7</p> <p>importance [6] - 7:22, 27:6, 27:10, 27:18, 33:8, 37:20</p> <p>important [16] - 9:26, 15:15, 17:8, 19:20, 22:9, 25:15, 27:24, 28:6, 30:19, 39:11, 49:24, 52:1, 85:25, 104:15, 115:4, 116:6</p> <p>importantly [2] - 2:2, 96:1</p> <p>imposed [4] - 30:9, 34:28, 47:17, 100:17</p> <p>impression [2] - 45:22</p> <p>improvised [5] - 71:15, 74:4, 74:5, 74:6, 74:17</p> <p>inaccuracy [1] - 46:28</p> <p>inaccurate [6] - 33:7, 43:21, 44:19, 44:23, 46:20, 47:4</p> <p>inadvertent [1] - 112:8</p> <p>incident [6] - 65:10, 71:28, 72:7, 74:13, 74:24, 74:26</p> <p>incidents [6] - 10:8, 10:23, 67:25, 74:10, 84:27, 87:26</p> <p>include [3] - 28:2, 28:3, 117:24</p> <p>included [1] - 110:15</p> <p>includes [2] - 19:17, 107:27</p> <p>including [8] - 6:26, 28:26, 82:4, 87:21, 100:22, 104:28, 107:27, 113:29</p> <p>incorrectly [1] - 44:10</p> <p>increase [13] - 42:18, 54:5, 88:28, 89:4, 91:9, 91:12, 91:13, 91:18, 91:23, 92:15, 100:24, 101:1, 107:13</p> <p>increased [1] - 107:17</p> <p>increases [4] - 30:18, 59:13, 91:17, 106:26</p> <p>indeed [11] - 6:13, 17:28, 18:24, 24:15, 26:24, 48:27, 52:2,</p>	<p>77:7, 77:12, 98:2, 110:23</p> <p>independent [2] - 69:11, 69:15</p> <p>INDEX [1] - 121:1</p> <p>indexed [1] - 37:28</p> <p>indicate [3] - 56:3, 56:6, 69:23</p> <p>indicated [6] - 4:3, 25:2, 42:24, 47:26, 56:17, 57:4</p> <p>indicates [1] - 119:11</p> <p>individual [30] - 2:25, 15:7, 21:2, 29:6, 36:1, 50:7, 54:7, 54:16, 57:6, 61:2, 62:14, 88:29, 89:21, 89:25, 90:5, 92:22, 92:27, 93:13, 93:14, 93:24, 94:23, 105:22, 106:5, 106:21, 108:1, 108:4, 108:10, 108:19, 110:8, 110:9</p> <p>individual's [1] - 55:9</p> <p>individualised [2] - 93:21, 114:21</p> <p>individually [2] - 3:22, 52:12</p> <p>individuals [14] - 27:29, 28:18, 52:10, 78:7, 88:12, 90:28, 91:9, 93:2, 94:4, 95:7, 106:27, 112:4, 114:9, 116:21</p> <p>indulgence [1] - 56:20</p> <p>inevitable [2] - 33:21, 37:10</p> <p>inevitably [1] - 17:4</p> <p>infinite [1] - 112:11</p> <p>informant [1] - 28:10</p> <p>information [24] - 4:8, 18:5, 18:7, 19:10, 20:2, 20:7, 47:19, 54:17, 73:5, 78:4, 78:11, 80:7, 81:24, 82:15, 86:22, 87:1, 90:6, 92:6, 104:15, 106:20, 108:26, 112:6, 114:1, 114:23</p> <p>information.. [1] - 89:22</p> <p>informative [1] - 42:22</p> <p>informed [4] - 7:6, 28:16, 94:9, 94:10</p> <p>infrequent [1] - 88:8</p> <p>inherent [1] - 114:16</p> <p>injured [5] - 65:9,</p>	<p>65:13, 65:18, 71:6, 80:25</p> <p>injuries [6] - 51:17, 65:24, 71:19, 78:26, 79:22, 79:26</p> <p>injury [1] - 71:15</p> <p>input [3] - 21:7, 27:7, 27:12</p> <p>inquest [5] - 101:3, 104:4, 104:9, 104:26, 105:14</p> <p>Inquest [13] - 53:2, 84:17, 84:21, 87:29, 88:10, 95:9, 100:18, 103:24, 103:26, 106:12, 109:1, 115:5, 115:26</p> <p>inquests [1] - 103:23</p> <p>Inquiries [1] - 33:29</p> <p>inquiries [2] - 28:29, 47:14</p> <p>inquiry [1] - 63:28</p> <p>INQUIRY [1] - 1:1</p> <p>Inquiry [165] - 1:26, 2:4, 2:7, 2:9, 4:6, 4:21, 4:25, 5:2, 5:4, 5:11, 5:17, 5:20, 6:18, 7:17, 7:22, 8:16, 8:17, 8:18, 9:13, 9:21, 9:26, 10:24, 11:12, 11:24, 12:5, 12:15, 12:20, 13:1, 13:25, 14:2, 14:5, 14:9, 15:16, 15:23, 15:26, 15:29, 16:8, 16:12, 16:18, 16:20, 16:25, 16:29, 17:9, 17:20, 17:24, 18:9, 18:20, 18:28, 19:4, 21:14, 21:15, 21:29, 22:15, 22:19, 23:2, 23:8, 23:20, 24:5, 24:12, 24:16, 24:27, 25:4, 25:7, 25:9, 25:12, 25:17, 25:20, 25:24, 26:23, 27:26, 27:27, 28:6, 28:16, 28:18, 28:19, 28:28, 29:8, 29:21, 30:4, 30:7, 30:12, 30:18, 30:21, 30:22, 30:25, 32:9, 32:11, 34:3, 35:5, 35:10, 35:11, 35:16, 36:13, 36:27, 37:24, 37:26, 38:14, 39:10, 39:15, 39:23, 40:9, 40:19, 40:22, 41:17, 41:24, 42:12, 42:15, 43:18, 45:11, 45:12, 46:5, 48:20, 48:23, 48:26, 49:8, 49:11, 51:27, 57:20, 58:25, 58:29,</p>	<p>59:3, 59:11, 59:12, 61:4, 62:13, 62:17, 69:20, 72:27, 83:26, 84:3, 85:6, 86:22, 86:26, 87:17, 87:29, 88:10, 89:9, 90:19, 90:25, 91:5, 92:1, 92:7, 92:10, 92:16, 95:12, 95:26, 102:25, 103:17, 106:9, 107:1, 108:5, 108:16, 108:17, 108:24, 109:4, 109:7, 109:11, 109:23, 110:6, 110:7, 110:16, 114:20</p> <p>Inquiry's [20] - 1:23, 5:9, 8:12, 13:12, 13:16, 13:24, 15:1, 16:15, 24:21, 27:8, 27:13, 34:28, 38:1, 38:28, 39:14, 39:26, 48:24, 107:21, 114:1, 117:23</p> <p>inside [1] - 67:20</p> <p>insight [1] - 62:13</p> <p>insofar [2] - 58:19, 59:17</p> <p>Inspector [6] - 61:25, 67:9, 79:6, 79:16, 80:14, 80:24</p> <p>installed [1] - 41:5</p> <p>instance [2] - 77:13, 107:6</p> <p>institutional [2] - 92:2, 115:20</p> <p>intelligence [5] - 86:21, 87:25, 91:25, 113:17, 119:6</p> <p>Intelligence [1] - 113:26</p> <p>intend [3] - 23:22, 48:10, 96:11</p> <p>intended [6] - 36:13, 36:15, 36:28, 40:19, 74:20, 87:23</p> <p>intensive [1] - 21:13</p> <p>intent [5] - 54:6, 69:2, 88:22, 88:29, 89:3</p> <p>intention [2] - 12:29, 27:16</p> <p>interest [6] - 15:17, 26:15, 114:28, 116:6, 117:19, 118:25</p> <p>interested [1] - 107:1</p> <p>interests [3] - 48:1, 118:2, 118:3</p> <p>interfere [1] - 27:15</p> <p>interlude [2] - 33:12, 69:22</p> <p>internal [1] - 69:19</p>	<p>International [2] - 23:19, 24:5</p> <p>Internet [1] - 43:20</p> <p>internment [1] - 75:1</p> <p>interpreting [1] - 95:18</p> <p>interrupt [1] - 85:12</p> <p>interviewed [1] - 28:9</p> <p>introduce [1] - 2:24</p> <p>investigate [2] - 13:17, 33:22</p> <p>investigating [4] - 28:21, 67:9, 67:10, 79:4</p> <p>investigation [7] - 5:12, 7:27, 11:4, 23:2, 23:12, 25:22, 28:22</p> <p>Investigation [2] - 79:8, 80:4</p> <p>Investigations [1] - 79:9</p> <p>investigative [1] - 10:22</p> <p>investigator [1] - 28:7</p> <p>invite [14] - 38:25, 55:16, 60:9, 68:9, 69:19, 70:18, 72:8, 72:27, 73:17, 79:13, 92:1, 95:12, 107:5, 110:16</p> <p>inviting [1] - 60:6</p> <p>involve [4] - 2:6, 2:14, 19:23, 108:1</p> <p>involved [9] - 5:15, 28:12, 30:12, 70:25, 89:16, 94:4, 100:18, 107:27, 108:5</p> <p>involves [3] - 27:7, 27:12, 104:18</p> <p>involving [1] - 115:26</p> <p>IRA [6] - 28:11, 60:25, 64:13, 64:14, 68:29, 74:29</p> <p>Ireland [78] - 4:18, 6:28, 8:9, 8:22, 12:18, 15:14, 15:28, 16:14, 16:17, 16:18, 16:23, 17:1, 17:26, 18:21, 22:20, 22:25, 23:6, 23:11, 23:17, 23:29, 24:20, 24:22, 32:17, 32:25, 39:18, 39:21, 39:22, 40:18, 40:23, 41:1, 41:21, 42:3, 43:5, 43:22, 45:5, 45:19, 45:25, 46:14, 46:21, 46:24, 47:7, 47:10, 47:29, 50:17,</p>
--	--	--	---	---

<p>50:24, 51:13, 52:8, 53:5, 57:26, 58:8, 62:6, 64:13, 66:11, 75:16, 77:12, 78:8, 84:27, 87:13, 87:14, 88:1, 91:8, 92:21, 95:25, 96:13, 96:15, 96:26, 97:16, 97:22, 99:25, 102:27, 103:6, 103:15, 105:7, 116:11, 116:15, 116:24, 117:5, 118:29</p> <p>Irish [7] - 15:24, 22:28, 23:18, 24:4, 24:6, 24:10, 75:20</p> <p>ironing [1] - 17:4</p> <p>irrational [3] - 111:2, 111:7, 111:16</p> <p>irrelevant [1] - 94:15</p> <p>is.. [1] - 63:6</p> <p>Ismay [1] - 68:5</p> <p>issue [44] - 4:12, 4:14, 5:22, 6:13, 11:21, 13:10, 13:13, 13:14, 13:17, 13:26, 14:7, 14:18, 14:26, 15:2, 15:4, 15:5, 18:2, 18:19, 24:7, 24:27, 26:3, 29:25, 38:8, 39:1, 39:11, 42:9, 42:11, 48:10, 48:17, 49:1, 50:4, 51:4, 53:5, 55:16, 58:8, 85:25, 93:27, 96:12, 96:27, 106:29, 107:26, 110:4</p> <p>issues [18] - 10:1, 10:9, 13:24, 17:5, 17:8, 17:28, 34:14, 35:27, 46:24, 52:1, 52:2, 58:15, 93:17, 95:23, 114:3, 114:7, 114:10, 114:14</p> <p>IT [6] - 20:2, 22:2, 35:12, 37:27, 41:4, 41:16</p> <p>item [5] - 4:13, 14:14, 15:12, 21:2, 81:16</p> <p>itself [11] - 11:7, 15:25, 23:2, 36:9, 43:17, 47:23, 68:24, 69:17, 75:12, 112:12, 117:24</p>	<p>67:9, 78:25, 79:6, 79:16, 80:28, 81:5</p> <p>joined [1] - 65:20</p> <p>joining [1] - 67:3</p> <p>joint [12] - 18:22, 18:25, 19:5, 19:13, 19:19, 20:10, 21:26, 21:29, 22:5, 22:7, 22:11, 82:8</p> <p>Joint [1] - 53:29</p> <p>Jordan [6] - 95:15, 103:24, 103:26, 104:2, 106:12, 117:3</p> <p>journalist [1] - 28:3</p> <p>journalistic [1] - 47:20</p> <p>journalists [1] - 47:16</p> <p>journey [1] - 28:6</p> <p>JTAC [12] - 53:27, 53:29, 54:9, 57:12, 83:8, 83:27, 85:10, 86:18, 86:27, 88:19, 92:10, 93:6</p> <p>judge [3] - 31:2, 55:28, 82:26</p> <p>judged [3] - 25:18, 26:5, 58:22</p> <p>judges [1] - 97:28</p> <p>judging [1] - 92:4</p> <p>judgment [19] - 7:2, 51:5, 51:28, 52:21, 98:14, 99:26, 101:15, 102:14, 102:15, 102:18, 102:26, 103:4, 103:15, 103:18, 103:25, 104:12, 105:11, 115:11, 116:1</p> <p>judgments [2] - 97:14, 102:12</p> <p>judgments.. [1] - 97:9</p> <p>judicial [4] - 6:28, 51:28, 95:29, 104:4</p> <p>judiciary [1] - 77:13</p> <p>July [5] - 48:22, 61:28, 69:17, 70:22, 81:20</p> <p>June [4] - 8:18, 17:21, 72:8, 72:14</p> <p>jurisdiction [6] - 76:25, 77:10, 77:19, 88:11, 96:1, 96:8</p> <p>jurisprudence [1] - 105:6</p> <p>justice [7] - 13:21, 35:2, 49:27, 50:2, 77:16, 98:1, 106:7</p> <p>Justice [33] - 7:1, 53:1, 84:18, 84:19,</p>	<p>84:22, 95:8, 95:15, 95:17, 95:19, 98:14, 98:21, 98:22, 99:11, 100:14, 102:13, 102:15, 102:16, 102:20, 103:3, 103:20, 103:25, 104:2, 104:8, 104:11, 105:13, 106:2, 106:11, 107:5, 107:10, 108:11, 108:29, 110:5</p> <p>justified [2] - 33:25, 34:15</p>	<p>largely [4] - 20:13, 94:15, 98:6, 117:2</p> <p>last [18] - 6:14, 6:18, 6:24, 7:1, 7:13, 16:20, 23:16, 24:2, 40:9, 41:21, 42:12, 44:17, 47:1, 48:22, 65:10, 75:25, 81:16, 83:6</p> <p>late [1] - 23:16</p> <p>latest [1] - 13:23</p> <p>latter [1] - 98:18</p> <p>Law [10] - 13:27, 14:3, 14:20, 58:13, 99:25, 110:3, 110:13, 110:29, 111:8, 111:15</p> <p>law [19] - 49:13, 50:28, 58:10, 61:23, 85:2, 93:19, 102:7, 105:25, 106:15, 106:29, 107:21, 107:24, 109:2, 109:22, 109:27, 110:11, 110:21, 117:1</p> <p>laws [2] - 26:1, 97:23</p> <p>lawyer's [1] - 76:22</p> <p>lawyers [1] - 111:25</p> <p>lay [2] - 90:22, 90:27</p> <p>lead [7] - 10:28, 28:7, 32:10, 45:12, 62:9, 79:9, 95:16</p> <p>leading [1] - 67:10</p> <p>learned [2] - 117:3, 119:25</p> <p>learning [1] - 34:18</p> <p>least [3] - 24:18, 40:2, 50:7</p> <p>leave [7] - 37:13, 42:8, 56:2, 56:18, 77:24, 86:10, 106:14</p> <p>led [2] - 11:25, 13:29</p> <p>left [4] - 3:28, 65:3, 66:4, 100:10</p> <p>leg [1] - 65:24</p> <p>legal [9] - 7:17, 18:29, 34:7, 34:29, 49:9, 50:18, 59:4, 112:29, 114:28</p> <p>Legal [44] - 2:7, 4:6, 5:2, 5:11, 9:27, 10:24, 11:13, 11:24, 12:5, 12:20, 13:1, 13:25, 14:2, 14:5, 14:9, 16:25, 17:9, 17:24, 18:21, 21:15, 23:20, 25:4, 25:7, 25:17, 28:17, 29:8, 29:21, 30:18, 30:25, 35:5, 35:16, 36:13, 36:27, 37:24, 37:27, 39:10, 39:14, 40:22, 43:18, 48:20, 48:23, 49:8,</p>	<p>51:27, 59:3</p> <p>legislation [1] - 23:18</p> <p>legitimate [4] - 35:2, 90:19, 90:24, 90:29</p> <p>length [1] - 20:19</p> <p>less [1] - 46:12</p> <p>lest [1] - 42:1</p> <p>lethal [2] - 103:9, 106:24</p> <p>level [9] - 52:23, 52:25, 53:21, 53:23, 87:14, 91:23, 92:29, 98:25, 98:26</p> <p>liaise [1] - 19:20</p> <p>lie [1] - 45:7</p> <p>life [14] - 52:10, 59:20, 60:15, 60:24, 61:15, 69:3, 78:26, 81:25, 83:18, 83:19, 85:9, 89:25, 104:23, 106:2</p> <p>life-changing [1] - 78:26</p> <p>life.. [1] - 90:7</p> <p>lifestyle [1] - 62:7</p> <p>lifestyles [1] - 93:20</p> <p>light [2] - 14:14, 111:9</p> <p>likely [21] - 10:27, 13:6, 43:27, 46:27, 53:2, 54:5, 78:8, 82:15, 87:16, 87:18, 87:23, 88:28, 89:9, 90:17, 90:28, 92:13, 97:15, 106:23, 106:25, 109:13</p> <p>limb [2] - 58:17, 100:27</p> <p>limited [1] - 36:17</p> <p>line [2] - 36:2</p> <p>lines [3] - 18:29, 100:11, 101:17</p> <p>list [2] - 10:9, 13:24</p> <p>listed [2] - 103:16, 117:23</p> <p>listening [1] - 112:11</p> <p>lit [1] - 80:18</p> <p>litigation [1] - 9:21</p> <p>live [5] - 48:11, 48:13, 62:7, 73:6, 119:13</p> <p>Live [1] - 83:4</p> <p>lived [1] - 51:23</p> <p>lives [3] - 83:28, 89:26, 119:13</p> <p>located [3] - 74:5, 74:6, 99:28</p> <p>location [4] - 40:19, 73:29, 74:13, 74:25</p> <p>lodged [2] - 2:18,</p>
<p style="text-align: center;">J</p> <p>January [5] - 21:14, 23:26, 35:5, 71:5, 76:2</p> <p>jobs [1] - 114:16</p> <p>John [8] - 28:3, 28:9,</p>	<p>joined [1] - 65:20</p> <p>joining [1] - 67:3</p> <p>joint [12] - 18:22, 18:25, 19:5, 19:13, 19:19, 20:10, 21:26, 21:29, 22:5, 22:7, 22:11, 82:8</p> <p>Joint [1] - 53:29</p> <p>Jordan [6] - 95:15, 103:24, 103:26, 104:2, 106:12, 117:3</p> <p>journalist [1] - 28:3</p> <p>journalistic [1] - 47:20</p> <p>journalists [1] - 47:16</p> <p>journey [1] - 28:6</p> <p>JTAC [12] - 53:27, 53:29, 54:9, 57:12, 83:8, 83:27, 85:10, 86:18, 86:27, 88:19, 92:10, 93:6</p> <p>judge [3] - 31:2, 55:28, 82:26</p> <p>judged [3] - 25:18, 26:5, 58:22</p> <p>judges [1] - 97:28</p> <p>judging [1] - 92:4</p> <p>judgment [19] - 7:2, 51:5, 51:28, 52:21, 98:14, 99:26, 101:15, 102:14, 102:15, 102:18, 102:26, 103:4, 103:15, 103:18, 103:25, 104:12, 105:11, 115:11, 116:1</p> <p>judgments [2] - 97:14, 102:12</p> <p>judgments.. [1] - 97:9</p> <p>judicial [4] - 6:28, 51:28, 95:29, 104:4</p> <p>judiciary [1] - 77:13</p> <p>July [5] - 48:22, 61:28, 69:17, 70:22, 81:20</p> <p>June [4] - 8:18, 17:21, 72:8, 72:14</p> <p>jurisdiction [6] - 76:25, 77:10, 77:19, 88:11, 96:1, 96:8</p> <p>jurisprudence [1] - 105:6</p> <p>justice [7] - 13:21, 35:2, 49:27, 50:2, 77:16, 98:1, 106:7</p> <p>Justice [33] - 7:1, 53:1, 84:18, 84:19,</p>	<p style="text-align: center;">K</p> <p>KC [1] - 45:13</p> <p>Keegan [1] - 84:18</p> <p>Keegan's [2] - 84:23, 108:29</p> <p>keen [1] - 85:27</p> <p>keep [1] - 22:14</p> <p>kept [4] - 11:3, 17:12, 51:20, 61:13</p> <p>Kerr [4] - 66:19, 66:26, 66:28, 67:27</p> <p>Kevin [1] - 28:10</p> <p>key [7] - 15:21, 16:4, 27:28, 28:12, 29:16, 38:16, 66:24</p> <p>killed [2] - 64:13, 68:5</p> <p>kind [6] - 58:8, 58:9, 73:14, 76:24, 84:10, 89:26</p> <p>kinds [3] - 72:28, 77:17, 77:18</p> <p>Kingdom [6] - 50:18, 50:19, 77:6, 77:12, 77:22, 116:11</p> <p>knowing [1] - 65:19</p> <p>known [8] - 4:9, 28:14, 28:27, 47:15, 48:12, 51:6, 81:6, 89:5</p> <p>knows [5] - 5:15, 65:20, 73:5, 73:6</p>	<p style="text-align: center;">L</p> <p>laboriously [1] - 84:1</p> <p>lack [2] - 10:28, 87:4</p> <p>Lady [1] - 84:18</p> <p>laid [1] - 24:22</p> <p>language [1] - 102:8</p> <p>Large [1] - 28:28</p> <p>large [6] - 6:12, 28:29, 30:2, 53:22, 94:1, 94:6</p>	<p style="text-align: center;">L</p> <p>laboriously [1] - 84:1</p> <p>lack [2] - 10:28, 87:4</p> <p>Lady [1] - 84:18</p> <p>laid [1] - 24:22</p> <p>language [1] - 102:8</p> <p>Large [1] - 28:28</p> <p>large [6] - 6:12, 28:29, 30:2, 53:22, 94:1, 94:6</p>

<p>86:7 London [5] - 39:19, 41:6, 41:13, 41:19, 42:18 Londonderry [2] - 75:25, 80:18 Londonderry" [1] - 74:26 look [8] - 21:28, 62:18, 64:5, 77:25, 79:13, 81:17, 87:11, 98:12 looking [8] - 46:2, 64:1, 72:5, 73:20, 78:28, 99:21, 99:24, 100:3 looks [1] - 81:3 Lord [118] - 51:5, 51:10, 56:16, 56:24, 57:17, 57:25, 58:15, 59:22, 59:29, 60:12, 60:29, 61:20, 62:11, 62:24, 63:5, 63:17, 63:20, 63:21, 63:28, 64:5, 64:17, 64:20, 65:5, 65:29, 66:16, 66:17, 67:2, 67:6, 67:13, 67:14, 67:25, 68:2, 68:9, 68:12, 69:7, 69:14, 70:2, 70:16, 70:20, 71:27, 72:4, 73:17, 73:18, 73:27, 75:4, 75:21, 76:1, 76:5, 76:8, 76:20, 76:29, 77:7, 77:24, 78:17, 79:1, 79:3, 79:12, 79:22, 79:28, 80:13, 81:11, 81:19, 81:29, 82:29, 83:8, 84:2, 84:5, 84:9, 86:17, 87:12, 87:25, 88:6, 88:18, 90:11, 91:12, 91:27, 93:26, 94:2, 94:14, 94:26, 95:3, 96:6, 96:18, 96:21, 97:20, 98:4, 98:14, 98:17, 98:21, 99:1, 99:11, 99:15, 100:5, 100:10, 100:14, 101:14, 102:13, 102:14, 102:16, 102:20, 103:3, 103:20, 103:28, 105:11, 106:14, 107:24, 108:11, 109:21, 110:2, 110:5, 110:23, 110:28, 111:22, 111:28, 112:14, 112:19 Lords [2] - 51:13, 102:6</p>	<p>Lordship [15] - 56:22, 58:1, 60:6, 64:1, 65:11, 74:22, 78:21, 80:21, 81:3, 84:21, 95:22, 99:24, 102:11, 105:29, 106:10 Lordship's [1] - 60:10 loss [6] - 31:10, 59:20, 83:17, 83:19, 85:8, 104:22 lost [3] - 5:5, 42:13, 112:9 loud [1] - 39:28 loved [1] - 62:15 low [1] - 61:14 lower [2] - 93:4, 93:9 ludicrous [1] - 39:29 lunch [4] - 4:5, 38:25, 38:26, 42:29 LUNCH [1] - 121:6 LUNCHEON [3] - 43:8, 43:11, 121:5 Lurgan [1] - 76:17</p>	<p>MARCH [2] - 1:1, 120:6 March [11] - 6:16, 6:25, 7:5, 8:8, 16:5, 32:22, 41:15, 64:9, 71:23, 73:28, 75:12 Martin [1] - 28:7 Massereene [1] - 64:12 material [93] - 4:24, 6:27, 8:8, 8:10, 8:15, 8:21, 10:22, 11:16, 12:17, 12:19, 12:29, 15:13, 15:29, 16:7, 16:13, 16:14, 16:19, 17:5, 17:13, 17:19, 18:3, 18:4, 18:6, 18:9, 18:14, 18:16, 19:16, 19:18, 19:21, 19:24, 19:28, 20:1, 20:5, 20:12, 20:17, 20:22, 20:24, 20:28, 20:29, 21:10, 21:18, 22:2, 22:15, 22:19, 22:29, 23:1, 23:3, 23:4, 26:13, 27:8, 27:13, 29:27, 30:19, 30:26, 31:3, 31:4, 32:16, 32:24, 33:21, 33:24, 34:6, 34:10, 34:16, 35:8, 35:10, 35:11, 35:29, 36:4, 36:16, 36:17, 36:18, 36:19, 36:21, 37:3, 37:16, 37:22, 37:25, 38:11, 39:25, 40:6, 40:13, 45:18, 45:26, 46:6, 49:17, 78:19, 83:10, 83:27, 91:11, 91:13, 91:18, 92:15, 108:18 Material [3] - 4:29, 33:16, 41:26 materialised [1] - 19:15 materially [4] - 59:13, 91:17, 106:26, 107:13 materials [16] - 5:18, 20:25, 22:28, 57:14, 62:19, 68:2, 69:8, 79:29, 83:13, 84:11, 85:7, 90:12, 92:8, 93:7, 95:27, 111:26 matter [13] - 14:13, 31:11, 33:7, 38:24, 38:26, 40:8, 83:19, 83:20, 83:21, 83:22, 115:5, 115:25, 118:7 matters [14] - 1:10, 7:12, 11:19, 13:22, 14:3, 17:4, 19:2, 22:22, 22:24, 22:27,</p>	<p>26:21, 31:6, 53:9, 117:29 Matthew [1] - 12:2 maximising [1] - 37:4 McAlinden [1] - 7:1 McCartan [1] - 99:18 McGrory [1] - 68:29 McVicker [1] - 20:6 mean [5] - 31:20, 33:24, 48:3, 73:9, 106:6 meaning [1] - 87:15 meaningful [1] - 37:4 means [1] - 8:15 meant [1] - 59:9 meantime [1] - 3:29 measures [4] - 48:8, 48:17, 60:26, 91:6 mechanics [1] - 16:21 mechanism [2] - 24:16, 118:19 media [5] - 37:9, 43:27, 89:8, 90:1, 108:27 medical [1] - 85:4 meet [3] - 19:2, 22:8, 30:20 meeting [1] - 41:20 meetings [3] - 16:24, 16:27, 19:29 member [2] - 73:12, 88:26 members [18] - 13:18, 24:11, 40:22, 52:23, 70:13, 73:3, 73:9, 78:5, 78:7, 87:20, 88:8, 88:9, 90:18, 97:1, 97:17, 98:1, 98:24 Memorandum [4] - 15:23, 15:25, 15:27, 17:6 men [3] - 68:19, 68:28, 82:3 menacing [1] - 81:8 mention [1] - 13:12 mentioned [2] - 37:6, 79:4 mercifully [1] - 79:22 message [1] - 69:25 met [6] - 92:9, 92:12, 93:7, 94:15, 94:20, 109:25 methodology [1] - 9:19 methods [1] - 70:26 Mi5 [2] - 68:14, 68:18 microphone [3] - 3:25, 3:26, 56:3</p>	<p>microphones [4] - 3:16, 3:22, 3:25, 56:7 midday [6] - 43:16, 43:17, 43:29, 44:19, 44:27, 45:3 might [11] - 10:13, 39:27, 56:19, 76:6, 78:17, 94:23, 100:8, 112:28, 113:1, 116:27, 119:1 mildly [1] - 34:24 mile [1] - 66:6 military [1] - 71:8 million [1] - 25:11 mind [14] - 11:3, 30:16, 40:7, 53:4, 56:24, 59:22, 59:28, 63:25, 79:12, 85:24, 86:1, 86:15, 107:21 minds [1] - 22:3 mindset [1] - 73:12 mine [1] - 44:8 minimum [4] - 95:10, 105:26, 106:4, 106:10 minister [1] - 116:14 minister's [2] - 116:4, 116:9 ministerial [1] - 24:9 Ministry [1] - 12:19 minute [2] - 1:13, 37:19 minutes [6] - 5:29, 31:22, 44:17, 85:16, 112:27, 113:3 misreporting [1] - 32:5 missed [1] - 30:28 mistakes [1] - 112:8 misunderstanding [1] - 15:6 misunderstood [1] - 33:2 MIT [1] - 79:8 mobile [1] - 76:18 modern [2] - 90:1, 108:26 modest [1] - 59:4 moment [18] - 13:11, 31:21, 37:23, 43:25, 44:3, 44:6, 60:29, 64:17, 65:5, 68:4, 79:28, 80:14, 85:13, 91:11, 96:20, 99:9, 105:29, 119:28 momentarily [1] - 67:7 moments [1] - 28:13 momentum [3] - 5:5, 30:10, 31:10 Monday [1] - 7:2 month [4] - 41:2,</p>
M				
	<p>M1 [1] - 67:21 Maghaberry [1] - 67:19 main [2] - 2:1, 58:2 maintain [4] - 5:4, 6:17, 9:28, 10:17 maintained [3] - 30:10, 30:11, 62:3 Majesty's [6] - 2:26, 26:25, 43:4, 47:29, 78:6, 112:20 Major [3] - 28:28, 79:8, 80:4 major [1] - 28:29 majority [1] - 116:14 maker [3] - 57:25, 58:21, 100:6 Mallon [1] - 104:10 man [2] - 28:9, 76:16 Man [1] - 76:11 manageable [1] - 35:25 managed [1] - 40:13 management [2] - 35:7, 35:28 mandated [1] - 26:1 manifold [1] - 51:15 manner [3] - 5:13, 20:6, 96:23 manual [1] - 20:29 manually [2] - 20:20, 21:7</p>			

<p>41:14, 41:21, 42:19 months [3] - 32:10, 45:11, 46:5 months' [1] - 7:16 moreover [4] - 7:19, 14:5, 17:26, 32:19 Morgan's [4] - 102:15, 102:20, 103:3, 103:21 morning [7] - 1:4, 1:9, 46:10, 47:6, 85:13, 86:6, 120:1 most [8] - 7:21, 23:26, 46:9, 47:12, 52:13, 96:1, 108:7, 108:8 motivation [1] - 34:15 mount [1] - 81:25 move [9] - 9:29, 15:5, 51:18, 59:28, 60:1, 66:10, 88:19, 91:27, 95:24 moved [3] - 5:12, 5:26, 24:2 movements [1] - 89:25 moves [1] - 61:10 moving [6] - 7:12, 9:29, 65:10, 67:27, 70:10, 117:11 MP [1] - 21:8 MP.. [1] - 21:16 MR [63] - 1:7, 1:9, 3:24, 6:9, 32:1, 33:3, 33:9, 39:24, 42:7, 43:15, 44:4, 44:8, 44:11, 44:16, 47:24, 56:8, 56:14, 56:16, 56:22, 56:24, 62:24, 62:28, 63:4, 63:9, 63:16, 63:17, 63:20, 64:5, 68:9, 69:14, 69:22, 70:2, 72:4, 73:11, 73:26, 75:7, 76:29, 77:7, 79:1, 79:3, 85:12, 85:24, 86:12, 86:17, 88:18, 94:26, 94:28, 95:3, 95:16, 99:10, 99:15, 99:24, 100:1, 100:5, 100:10, 100:14, 110:25, 111:6, 111:9, 112:19, 119:28, 121:4, 121:7 MS [5] - 112:26, 113:6, 113:9, 113:11, 121:9 multiple [3] - 90:25, 96:28, 114:10 murder [5] - 61:25, 68:14, 68:20, 69:1,</p>	<p>72:17 Murder" [1] - 64:3 murdered [2] - 51:16, 64:9 murderous [2] - 102:2, 104:28 must [19] - 8:10, 8:19, 30:5, 30:11, 30:22, 30:24, 37:28, 37:29, 38:11, 47:11, 48:11, 49:28, 50:11, 59:19, 83:11, 101:4, 106:17, 106:21 mustn't [1] - 47:23</p> <p style="text-align: center;">N</p> <p>name [24] - 28:10, 45:6, 45:29, 48:3, 54:3, 65:13, 67:11, 73:6, 76:22, 76:23, 77:2, 80:27, 80:28, 81:5, 81:6, 81:14, 89:27, 106:9, 107:16, 107:20, 110:5, 110:8, 110:14, 111:23 namely [9] - 7:15, 14:16, 23:18, 24:9, 33:13, 35:21, 46:29, 78:6, 106:22 names [8] - 68:22, 81:9, 82:7, 107:3, 113:28, 113:29, 118:16 narrative [2] - 27:29, 28:16 narrowly [2] - 33:26, 71:14 national [7] - 33:25, 34:16, 40:5, 70:24, 115:10, 115:18, 117:27 nature [7] - 41:17, 41:24, 59:19, 91:24, 92:25, 101:2 navigated [1] - 17:29 navigation [1] - 34:13 nearly [2] - 42:8, 44:29 necessarily [2] - 3:12, 109:23 necessary [16] - 4:22, 5:1, 11:16, 15:9, 17:12, 26:14, 31:5, 31:10, 31:14, 32:21, 33:22, 38:4, 41:16, 46:16, 56:1, 119:2 necessitates [2] - 37:22, 39:27 necessity [1] - 40:1</p>	<p>need [34] - 5:3, 5:29, 8:23, 9:4, 10:2, 11:3, 12:8, 17:29, 19:20, 21:5, 21:6, 21:7, 25:20, 25:22, 25:29, 26:7, 31:16, 31:20, 32:23, 35:29, 36:14, 37:10, 37:15, 41:5, 47:8, 49:29, 54:9, 59:25, 85:13, 108:17, 109:23, 117:24, 117:25, 119:13 needed [4] - 2:17, 14:13, 14:17, 38:29 needs [14] - 4:24, 5:17, 8:6, 14:6, 14:27, 18:20, 19:3, 25:28, 26:3, 26:5, 26:13, 39:6, 39:28, 48:15 negotiations [1] - 24:21 neighbours [1] - 51:20 network [4] - 40:5, 40:10, 40:13 neutral [1] - 99:26 never [3] - 34:24, 51:24, 87:28 nevertheless [2] - 24:19, 116:16 New [1] - 74:29 new [7] - 1:23, 5:26, 7:6, 19:22, 42:18, 44:12, 63:27 news [6] - 45:3, 45:28, 64:1, 76:28, 77:2, 78:20 News [1] - 75:20 newspaper [4] - 32:2, 32:3, 45:5, 79:5 next [2] - 8:14, 29:29, 41:2, 45:10, 46:4, 65:6, 65:15, 65:26, 66:9, 67:13, 68:9, 68:22, 69:7, 70:16, 71:11, 73:17, 77:25, 82:22, 96:18, 103:16, 112:19 no-one [3] - 25:25, 49:1, 85:28 No.1 [1] - 60:9 No.191 [1] - 73:18 No.343 [1] - 63:28 No.345 [1] - 63:26 No.368 [1] - 72:2 No.6 [1] - 69:20 No.71 [1] - 69:12 nobody [1] - 112:5 non [5] - 19:17, 20:13, 77:3, 98:6, 111:26</p>	<p>non-existence [1] - 98:6 non-sensitive [3] - 19:17, 20:13, 111:26 non-terrorist [1] - 77:3 none [1] - 15:6 nonetheless [1] - 115:28 norm [3] - 62:7, 77:10, 77:20 normal [1] - 77:1 normally [1] - 100:5 Norman [1] - 28:20 North [2] - 60:25, 71:8 Northern [45] - 39:18, 39:20, 39:22, 40:18, 40:23, 41:1, 41:21, 42:2, 43:4, 45:5, 47:29, 50:17, 50:24, 51:13, 52:8, 53:5, 57:26, 58:8, 62:6, 64:12, 66:11, 75:16, 78:8, 84:27, 87:13, 87:14, 88:1, 91:8, 92:21, 95:25, 96:13, 96:15, 96:26, 97:16, 97:22, 99:25, 102:27, 103:6, 103:14, 105:7, 116:11, 116:15, 116:24, 117:5, 118:29 note [8] - 1:22, 19:4, 48:24, 49:7, 49:19, 49:21, 59:3, 80:21 noted [1] - 116:7 notes [3] - 35:17, 36:13, 36:27 nothing [1] - 37:29 notice [1] - 51:18 noticed [2] - 72:22, 96:5 notwithstanding [1] - 26:29 November [2] - 67:21, 75:26 nuance [2] - 13:21, 95:6 number [22] - 6:26, 20:18, 25:24, 27:28, 28:25, 29:6, 30:2, 33:19, 44:18, 49:3, 50:2, 52:2, 65:6, 83:17, 84:26, 96:7, 99:19, 110:13, 112:11, 116:10 numbering [2] - 63:7, 63:13 numbers [2] - 62:26, 63:18</p>	<p>Numbers [1] - 51:17</p> <p style="text-align: center;">O</p> <p>objective [3] - 9:28, 91:17, 116:19 obligation [1] - 94:21 obligations [1] - 111:28 observation [7] - 1:22, 82:29, 90:27, 92:7, 93:12, 107:9, 110:2 observations [12] - 4:15, 13:28, 42:25, 42:27, 57:18, 61:24, 83:10, 87:4, 88:6, 91:29, 103:14, 110:29 observe [3] - 97:25, 98:4, 105:4 observed [3] - 46:21, 59:3, 106:11 observing [1] - 116:16 obtain [2] - 89:21, 90:6 obvious [8] - 5:20, 7:16, 8:25, 30:29, 34:13, 40:26, 48:12, 88:3 obviously [3] - 81:7, 83:28, 106:19 occasion [2] - 24:24, 31:2 occasions [4] - 10:5, 33:20, 50:2, 83:17 occupation [1] - 51:22 occur [1] - 14:7 occurred [3] - 15:24, 20:5, 26:12 October [2] - 72:6, 104:9 off-duty [1] - 74:18 offence [1] - 77:3 offences [5] - 68:26, 79:10, 82:3, 82:9, 82:12 offending [1] - 77:1 office [1] - 24:9 Office [4] - 28:27, 39:18, 39:22, 41:21 Officer [9] - 51:6, 58:27, 59:15, 59:24, 60:20, 84:5, 92:22, 95:17, 107:28 officer [44] - 28:21, 54:3, 60:9, 61:7, 61:8, 61:24, 62:1, 62:14, 64:11, 64:15, 65:2, 65:8, 65:18, 67:10,</p>
--	---	--	---	---

<p>67:16, 67:28, 67:29, 68:4, 71:6, 71:14, 72:12, 72:18, 72:22, 73:15, 74:14, 79:3, 79:4, 79:9, 80:12, 80:13, 81:13, 81:24, 82:4, 82:26, 83:19, 83:21, 83:22, 83:24, 91:19, 107:15, 107:28, 109:29, 111:23</p> <p>officer's [4] - 65:13, 74:18, 80:27, 81:6</p> <p>officers [62] - 15:7, 18:29, 19:29, 29:7, 51:13, 53:18, 53:21, 55:1, 56:28, 57:2, 57:3, 57:4, 60:8, 60:21, 61:1, 61:5, 61:26, 70:13, 72:29, 73:8, 75:16, 80:3, 83:29, 84:20, 87:22, 89:4, 89:16, 90:23, 92:9, 92:12, 92:15, 92:21, 92:26, 92:27, 93:1, 93:2, 93:10, 93:15, 93:28, 97:2, 100:17, 101:24, 102:28, 103:1, 103:7, 105:16, 105:17, 107:2, 108:1, 108:15, 108:20, 108:21, 109:11, 109:17, 111:2, 111:3, 111:18</p> <p>officials [3] - 24:10, 77:15, 97:29</p> <p>often [3] - 26:24, 96:12, 96:14</p> <p>old [3] - 38:13, 76:16, 83:22</p> <p>Omagh [22] - 1:17, 6:20, 10:6, 10:15, 13:2, 13:18, 17:20, 18:28, 23:1, 24:5, 28:1, 28:8, 28:13, 28:16, 28:21, 29:14, 29:19, 32:9, 45:10, 46:4, 66:29, 78:25</p> <p>ON [1] - 1:1</p> <p>once [10] - 2:11, 2:28, 8:18, 8:21, 10:11, 12:12, 35:27, 42:18, 48:10, 86:4</p> <p>one [52] - 5:22, 8:6, 18:2, 25:25, 26:7, 26:8, 28:26, 32:23, 40:7, 42:10, 44:13, 45:28, 46:11, 49:1, 49:2, 49:27, 57:18, 59:2, 60:20, 62:25, 62:26, 64:18, 65:3, 65:5, 74:24, 76:6,</p>	<p>77:5, 79:4, 83:2, 85:28, 86:29, 87:16, 88:4, 88:5, 91:15, 92:19, 93:3, 93:4, 93:26, 95:4, 96:20, 99:22, 101:8, 102:16, 104:21, 105:14, 105:15, 106:29, 108:7, 108:8, 110:3, 118:7</p> <p>one's [1] - 107:20</p> <p>one-and-a-half [1] - 65:3</p> <p>ones [1] - 62:15</p> <p>ongoing [2] - 84:25, 101:23</p> <p>online [2] - 72:5, 79:5</p> <p>open [52] - 3:6, 3:13, 3:14, 9:5, 25:10, 25:20, 26:8, 29:24, 35:2, 37:8, 37:18, 38:3, 38:17, 49:27, 50:2, 53:16, 53:19, 53:28, 55:8, 55:10, 57:8, 57:14, 60:2, 60:7, 62:18, 64:6, 66:18, 68:2, 69:8, 78:19, 79:28, 81:16, 83:13, 84:11, 85:7, 86:10, 86:18, 87:1, 87:2, 90:12, 92:8, 93:7, 93:14, 106:7, 106:20, 108:18, 113:15, 113:16, 113:18, 115:6, 119:8, 119:19</p> <p>opened [1] - 23:16</p> <p>opening [4] - 3:17, 51:5, 51:9, 57:18</p> <p>operate [3] - 56:7, 73:13, 119:7</p> <p>operated [1] - 79:8</p> <p>operation [3] - 20:13, 20:25, 71:18</p> <p>Operation [2] - 23:19, 24:5</p> <p>operational [5] - 26:4, 58:17, 58:20, 119:6</p> <p>operationally [2] - 26:8, 35:20</p> <p>opinion [3] - 51:11, 99:12, 100:4</p> <p>opportunity [7] - 11:8, 14:1, 19:9, 30:16, 32:3, 37:4, 113:23</p> <p>oral [7] - 2:21, 6:15, 7:8, 15:1, 27:3, 27:16, 34:3</p> <p>Order [9] - 1:12,</p>	<p>4:29, 9:1, 33:16, 35:13, 36:2, 41:26, 48:6, 70:3</p> <p>order [9] - 1:13, 2:21, 3:28, 5:29, 48:14, 55:16, 56:2, 63:24, 95:27</p> <p>orders [4] - 35:18, 48:25, 118:9, 118:13</p> <p>ordinarily [1] - 38:28</p> <p>ordinary [1] - 41:12</p> <p>organisation [3] - 19:25, 36:22, 55:7</p> <p>organisations [10] - 19:3, 19:6, 19:7, 19:18, 30:3, 40:25, 48:2, 103:9, 116:12, 116:15</p> <p>organised [3] - 1:25, 52:10, 103:8</p> <p>orientate [1] - 81:18</p> <p>original [1] - 14:15</p> <p>originate [1] - 20:16</p> <p>originates [2] - 18:5, 18:7</p> <p>originating [4] - 8:8, 32:16, 32:25, 45:18</p> <p>Osman [2] - 58:18, 103:11</p> <p>otherwise [5] - 4:25, 5:5, 83:12, 112:28, 113:1</p> <p>ought [3] - 49:10, 53:7, 94:24</p> <p>out.. [1] - 117:15</p> <p>outlined [1] - 96:22</p> <p>outset [1] - 58:1</p> <p>outside [5] - 22:28, 33:26, 61:15, 67:5, 75:25</p> <p>overarching [3] - 36:25, 87:13, 93:23</p> <p>overflow [1] - 1:29</p> <p>overlapping [1] - 118:27</p> <p>overleaf [1] - 81:3</p> <p>overlooked [1] - 11:10</p> <p>overt [1] - 10:21</p> <p>own [9] - 27:2, 43:24, 55:27, 66:2, 94:9, 94:11, 107:3, 107:16, 107:20</p> <p>owned [1] - 19:24</p> <p>owners [1] - 20:7</p> <p>ownership [1] - 19:21</p>	<p>pace [1] - 41:27</p> <p>page [79] - 45:4, 51:8, 60:5, 60:11, 62:25, 63:5, 63:8, 63:11, 63:12, 63:13, 63:15, 63:17, 63:26, 63:28, 63:29, 64:2, 64:6, 64:20, 65:1, 65:6, 65:11, 65:15, 65:29, 66:9, 66:16, 66:20, 67:6, 67:13, 67:17, 68:3, 68:16, 69:11, 69:14, 69:19, 69:20, 71:11, 72:2, 73:18, 73:19, 75:5, 75:21, 76:7, 76:23, 77:25, 78:21, 79:13, 80:15, 80:22, 81:3, 81:17, 81:19, 82:22, 83:5, 84:12, 84:15, 86:19, 87:3, 87:11, 96:20, 97:20, 101:16, 102:23, 103:29, 104:1, 109:16, 113:13, 113:15, 114:29, 115:3, 115:7, 116:2, 117:12, 118:10, 118:26</p> <p>PAGE [1] - 121:2</p> <p>pages [11] - 16:17, 20:18, 20:19, 25:10, 25:11, 26:22, 36:3, 62:20, 63:2, 68:10, 74:23</p> <p>painted [1] - 80:28</p> <p>paints [1] - 111:20</p> <p>pallet [1] - 80:28</p> <p>Panorama [1] - 28:4</p> <p>paper [2] - 3:18, 45:6</p> <p>papers [3] - 3:18, 112:8, 112:9</p> <p>paragraph [64] - 17:6, 51:10, 52:4, 59:24, 60:13, 60:22, 61:11, 61:23, 62:1, 64:27, 65:23, 65:26, 68:22, 70:5, 70:10, 70:18, 72:9, 72:19, 75:21, 76:22, 77:26, 82:6, 82:19, 82:22, 83:4, 84:14, 84:15, 84:16, 84:22, 90:15, 91:3, 95:18, 96:25, 97:3, 98:4, 98:13, 98:16, 98:18, 99:13, 99:14, 99:19, 100:12, 101:15, 101:19, 102:21, 103:3, 104:3, 104:14, 105:11, 105:12, 107:7, 107:29, 108:28, 115:3, 115:11,</p>	<p>115:12, 116:3, 117:13, 117:17, 118:1, 118:5, 118:11, 119:10</p> <p>paragraphs [10] - 36:3, 60:10, 61:9, 64:21, 67:6, 69:20, 69:29, 70:28, 83:6, 116:1</p> <p>parallel [1] - 20:23</p> <p>parallels [1] - 115:28</p> <p>paramilitaries [1] - 51:16</p> <p>pardon [5] - 63:27, 64:21, 73:18, 83:5, 94:27</p> <p>Park [1] - 72:13</p> <p>parked [1] - 76:17</p> <p>part [20] - 3:14, 5:11, 7:14, 8:14, 9:2, 9:10, 9:12, 13:1, 13:9, 14:19, 16:6, 32:2, 42:25, 50:18, 59:7, 60:16, 62:5, 69:8, 72:2, 88:13</p> <p>Part [1] - 29:16</p> <p>Participant [3] - 11:22, 42:3, 118:8</p> <p>Participants [62] - 2:8, 2:11, 2:18, 3:9, 4:10, 6:11, 7:5, 8:3, 8:23, 9:27, 10:24, 11:8, 11:12, 11:13, 11:28, 12:4, 12:15, 12:25, 13:3, 13:27, 14:1, 14:12, 16:2, 16:9, 16:12, 16:20, 23:5, 23:26, 24:18, 24:24, 24:28, 25:13, 25:26, 26:10, 26:17, 26:22, 27:24, 29:12, 33:14, 33:19, 34:6, 35:14, 37:8, 39:1, 39:25, 42:23, 42:27, 48:4, 53:23, 53:25, 54:25, 54:28, 86:5, 86:7, 86:25, 87:3, 88:4, 94:1, 94:6, 113:22, 119:4, 119:21</p> <p>participants [1] - 110:7</p> <p>participation [1] - 29:13</p> <p>particular [23] - 12:21, 22:21, 25:7, 35:22, 48:8, 48:29, 50:23, 57:27, 80:11, 84:14, 87:21, 96:16, 97:1, 97:8, 97:17, 103:6, 104:2, 105:18, 107:7, 108:10, 108:27, 109:15,</p>
P				
PA [1] - 47:9				

<p>116:11 particularly [9] - 33:7, 34:21, 41:26, 46:23, 52:5, 54:14, 85:4, 109:6, 117:5 particulars [1] - 57:6 partnership [1] - 20:4 parts [11] - 4:7, 7:13, 22:28, 26:7, 41:11, 77:11, 77:21, 97:23, 98:7, 113:27, 118:17 party [4] - 18:3, 18:11, 18:19, 26:14 passage [1] - 51:7 passages [2] - 52:1, 52:3 passing [2] - 67:20, 71:25 past [3] - 10:5, 11:6, 43:1 patience [1] - 86:15 pattern [3] - 81:25, 89:25, 90:7 Paul [1] - 45:13 pause [2] - 44:2, 99:7 pausing [6] - 60:29, 64:17, 79:28, 89:24, 91:11, 100:26 Peadar [1] - 65:9 penultimate [2] - 83:4, 90:15 people [10] - 3:17, 7:18, 9:19, 10:10, 10:13, 30:2, 33:27, 44:18, 78:5, 119:16 perfectly [2] - 77:1, 105:5 performed [1] - 114:16 perhaps [8] - 41:29, 77:8, 80:8, 87:21, 89:29, 93:18, 99:16, 100:3 period [14] - 6:2, 24:3, 24:20, 28:8, 31:19, 41:3, 41:4, 41:23, 43:28, 69:16, 71:29, 81:12, 84:6, 84:8 period.. [1] - 70:22 permanent [1] - 1:24 Permanent [2] - 41:20, 42:4 permissions [1] - 41:10 permit [2] - 9:5, 55:25 permits [1] - 35:24 permitted [2] -</p>	<p>34:22, 56:19 person [3] - 19:29, 55:5, 82:16 personal [9] - 55:9, 61:6, 61:20, 73:5, 93:16, 94:3, 94:9, 94:11, 113:29 personnel [1] - 119:6 perspective [1] - 114:10 perspectives [1] - 104:27 persuading [1] - 49:29 pertinent [3] - 19:2, 93:19, 98:16 Peter [1] - 72:16 petrol [1] - 71:7 phase [3] - 11:3, 45:10, 46:4 phone [1] - 76:18 phrase [1] - 30:28 physical [1] - 20:21 picked [1] - 88:5 picking [1] - 44:5 picture [2] - 15:17, 111:20 piece [6] - 23:18, 32:13, 45:4, 45:6, 45:8, 47:2 pieces [1] - 3:18 Pll [1] - 116:7 pipe [1] - 71:1 pixilated [1] - 81:14 place [13] - 1:12, 9:4, 14:20, 18:10, 27:14, 32:9, 41:24, 45:11, 46:5, 57:22, 69:24, 71:2, 111:27 placed [8] - 19:26, 62:12, 67:5, 68:6, 71:16, 80:29, 81:22, 97:17 plain [5] - 15:5, 15:6, 33:4, 85:25, 87:20 plainly [1] - 96:27 planned [1] - 80:7 platform [1] - 21:10 platform.. [1] - 21:8 play [2] - 13:2, 104:28 played [1] - 80:12 pleaded [1] - 77:26 pleased [1] - 41:12 plot [1] - 68:14 point [24] - 9:22, 9:24, 11:24, 13:23, 14:16, 15:3, 27:19, 34:1, 50:21, 51:9, 77:4, 77:7, 85:6, 86:2, 86:3, 88:3, 101:7,</p>	<p>101:11, 102:8, 102:24, 106:8, 106:23, 112:3, 119:23 pointed [1] - 10:4 points [4] - 28:6, 101:25, 119:20, 119:22 POL [1] - 90:7 police [52] - 2:26, 51:1, 51:21, 52:23, 54:3, 56:27, 60:16, 61:7, 64:15, 65:8, 65:20, 67:3, 67:28, 68:20, 69:1, 69:3, 70:13, 71:6, 72:18, 72:22, 73:8, 73:15, 74:14, 74:18, 74:27, 74:29, 75:16, 75:25, 76:11, 78:12, 79:18, 81:23, 82:4, 82:26, 83:23, 83:29, 84:20, 87:22, 89:16, 92:20, 97:2, 98:24, 101:24, 103:1, 103:7, 105:16, 105:17, 106:24, 109:17, 111:2, 111:17 Police [6] - 43:4, 47:29, 51:13, 76:17, 78:7, 78:25 policing [1] - 65:1 political [1] - 115:16 PONI [2] - 28:8, 28:12 poor [1] - 70:19 population [2] - 52:11, 101:25 portion [2] - 3:13, 84:13 pose [1] - 89:3 posed [1] - 116:12 poses [1] - 57:24 posing [2] - 70:8, 105:3 position [27] - 4:17, 4:20, 5:8, 14:5, 14:9, 23:27, 24:6, 24:7, 24:13, 24:21, 32:20, 32:21, 32:26, 32:29, 33:1, 34:25, 36:15, 39:18, 40:17, 40:29, 41:6, 45:23, 46:9, 55:4, 56:6, 114:9, 118:15 positive [1] - 16:26 possess [1] - 90:8 possessing [1] - 82:13 possession [2] - 18:14, 69:1 possibilities [1] - 112:11</p>	<p>possibility [4] - 44:22, 89:10, 89:15, 91:7 possible [13] - 6:17, 6:20, 9:5, 9:9, 10:7, 12:28, 13:20, 19:7, 36:14, 44:6, 51:23, 119:19, 119:21 possibly [2] - 49:14, 101:1 postpone [1] - 46:16 postponed [1] - 46:12 postponement [3] - 8:1, 45:24, 47:8 potential [4] - 8:11, 13:13, 83:25, 104:22 potentially [2] - 35:26, 36:1 powers [1] - 85:2 practical [3] - 19:5, 20:27, 97:26 practically [1] - 61:15 pre [1] - 91:15 pre-existing [1] - 91:15 precautionary [8] - 53:7, 57:27, 103:22, 104:7, 104:17, 105:5, 105:23, 117:7 precautions [1] - 77:18 precious [1] - 4:1 precise [1] - 99:28 precisely [3] - 39:24, 42:7, 105:1 predict [1] - 105:2 predictable [1] - 104:27 predictive [2] - 57:23 preferences [1] - 94:23 preliminary [2] - 1:10, 1:22 preparation [4] - 9:6, 13:14, 82:12, 83:15 prepare [2] - 5:16, 20:20 prepared [1] - 29:12 preparing [3] - 38:17, 68:28, 82:16 present [12] - 1:15, 52:13, 59:9, 59:26, 84:25, 84:29, 100:24, 100:27, 101:5, 101:11, 106:22, 113:5 presentation [5] - 12:11, 12:12, 12:17, 12:26, 13:2 press [2] - 84:28,</p>	<p>110:15 Press [8] - 1:28, 44:21, 44:22, 46:29, 47:1, 47:13, 47:17, 50:9 pressure [1] - 30:18 prevented [1] - 10:2 preventing [1] - 34:17 previous [7] - 10:8, 10:23, 64:2, 75:28, 76:21, 79:5, 83:3 previously [6] - 10:20, 12:8, 66:9, 81:6, 107:3, 107:20 primary [1] - 24:21 principle [12] - 6:22, 35:3, 49:12, 49:27, 53:9, 57:28, 59:14, 103:22, 105:6, 106:7, 113:1, 117:19 principles [13] - 2:23, 3:3, 35:21, 49:4, 49:9, 49:19, 49:25, 50:13, 50:16, 50:24, 59:4, 59:17, 114:28 print [1] - 70:19 prioritised [1] - 16:15 prison [4] - 67:16, 67:29, 68:4, 70:13 Prison [1] - 67:19 privacy [1] - 26:1 proactively [1] - 78:11 probability [2] - 85:4, 91:1 probable [1] - 87:16 problem [2] - 43:29, 46:27 problems [1] - 44:12 procedural [2] - 2:5, 31:11 procedure [1] - 49:2 procedures [1] - 116:22 proceedings [12] - 9:22, 19:23, 33:6, 42:3, 43:16, 47:6, 47:14, 47:19, 47:22, 88:10, 105:2, 110:15 Process [2] - 33:16, 41:27 process [33] - 4:29, 5:1, 5:4, 5:15, 8:21, 8:24, 9:2, 11:26, 12:4, 12:23, 16:1, 16:25, 22:29, 25:12, 25:15, 26:2, 26:15, 26:18, 26:24, 27:11, 28:13, 29:9, 32:24, 35:21,</p>
---	---	---	---	--

<p>36:5, 36:9, 36:23, 37:13, 37:20, 38:16, 38:19, 48:24, 48:25 processed [2] - 16:8, 16:19 processes [3] - 12:11, 20:23, 30:8 processing [1] - 17:13 product [2] - 16:29, 102:3 professional [1] - 111:28 Professor [1] - 11:26 profile [2] - 61:14, 94:11 progress [18] - 2:8, 4:6, 4:25, 4:28, 12:6, 17:17, 17:23, 17:26, 22:9, 22:22, 25:17, 26:29, 27:1, 30:4, 33:14, 38:1, 39:12, 39:15 progressed [4] - 9:7, 19:7, 27:2 progression [1] - 20:5 prominent [3] - 45:5, 108:7, 108:9 promised [1] - 11:21 proper [1] - 18:10 properly [3] - 10:29, 30:20, 37:28 proposal [1] - 21:24 proposals [1] - 23:28 propose [9] - 2:21, 23:12, 36:26, 42:21, 53:8, 55:15, 56:8, 118:23, 119:7 proposed [2] - 23:17, 48:25 proposition [2] - 50:1, 54:28 prosecuting [1] - 98:2 prosecutor [1] - 83:1 prosecutor's [2] - 76:23, 77:2 protect [6] - 55:1, 73:8, 85:3, 106:2, 119:14, 119:16 protected [1] - 77:15 protection [10] - 22:2, 26:1, 34:16, 60:26, 105:26, 106:10, 111:26, 112:1, 113:28, 118:19 protocol [2] - 48:21, 73:1 protocols [1] - 18:10 proved [2] - 40:16,</p>	<p>46:16 proven [2] - 89:20, 90:4 provide [16] - 4:17, 15:21, 19:4, 21:1, 21:15, 23:20, 25:15, 27:23, 35:27, 39:7, 41:15, 42:10, 42:11, 47:19, 51:9, 112:12 provided [12] - 15:18, 16:9, 16:16, 18:22, 19:16, 21:6, 27:23, 41:8, 84:27, 103:19, 114:5, 118:19 provider [4] - 19:24, 21:10, 21:18, 26:14 providers [11] - 4:24, 27:8, 27:13, 29:27, 30:19, 30:27, 36:16, 36:18, 36:19, 37:16, 37:22 provides [3] - 15:27, 65:16, 86:21 providing [4] - 2:7, 15:12, 25:5, 38:27 Provisional [1] - 60:25 provisional [2] - 10:9, 13:23 provisionally [5] - 35:8, 35:10, 35:29, 36:4, 36:17 proximity [1] - 64:18 PSNI [59] - 2:16, 3:1, 12:18, 14:21, 18:6, 18:14, 18:21, 18:27, 19:15, 20:3, 20:13, 20:14, 20:15, 20:19, 20:24, 21:1, 21:6, 21:7, 21:14, 21:15, 21:28, 22:7, 22:11, 22:16, 28:25, 29:4, 29:12, 50:23, 50:25, 53:14, 53:15, 53:16, 53:18, 53:27, 54:19, 54:25, 55:18, 55:25, 56:27, 56:28, 57:15, 65:18, 66:23, 68:14, 68:27, 71:2, 71:14, 71:25, 74:3, 75:9, 86:21, 88:27, 90:18, 90:19, 90:23, 91:5, 111:17 PSNI's [2] - 20:17, 84:13 Public [1] - 70:3 public [37] - 2:8, 4:10, 6:12, 7:7, 13:18, 15:17, 19:27, 27:25, 33:6, 33:14, 34:7, 39:2, 42:23, 48:4, 48:5, 53:22, 53:24,</p>	<p>54:4, 62:8, 73:3, 73:10, 73:13, 77:16, 88:27, 93:29, 94:6, 94:7, 97:29, 98:20, 104:21, 104:24, 114:28, 116:6, 117:19, 117:25, 117:29, 118:25 publication [2] - 1:18, 99:22 publicity [1] - 61:14 publicly [8] - 4:23, 5:2, 17:24, 30:17, 34:4, 38:6, 39:1, 62:4 published [12] - 1:20, 15:26, 24:4, 33:6, 35:6, 35:9, 45:4, 48:21, 48:23, 49:7, 77:2, 78:4 publishing [1] - 78:13 purchase [1] - 107:20 purpose [3] - 11:2, 29:17, 47:25 purposes [3] - 6:22, 20:26, 47:25 pursuant [1] - 48:5 pushing [1] - 15:2 put [10] - 4:25, 13:15, 18:10, 24:27, 24:29, 32:4, 34:24, 42:16, 56:5, 87:2 putting [1] - 79:18</p>	<p style="text-align: center;">R</p> <p>radar [1] - 61:15 raise [2] - 1:11, 23:2 raised [15] - 13:22, 14:3, 14:27, 31:3, 38:29, 39:6, 41:22, 91:28, 92:19, 93:26, 110:4, 114:7, 114:14, 119:20 range [5] - 20:18, 35:26, 68:26, 70:25, 93:10 ranking [2] - 77:15, 98:1 rate [1] - 48:24 rather [11] - 9:29, 14:8, 14:14, 27:2, 63:24, 70:19, 81:8, 91:12, 93:28, 99:25, 104:18 Re [6] - 51:6, 58:27, 84:5, 95:17, 117:3, 117:4 reach [3] - 2:23, 10:19, 94:28 reached [2] - 40:3, 106:8 reaction [1] - 7:19 read [6] - 59:25, 67:2, 80:26, 81:21, 105:19, 107:4 readily [2] - 83:13, 106:22 reads [14] - 46:2, 64:6, 70:20, 72:20, 75:13, 76:14, 77:27, 79:14, 82:1, 82:23, 90:15, 91:3, 101:20, 104:5 real [17] - 4:23, 52:11, 58:29, 59:1, 83:28, 84:29, 85:8, 89:14, 99:2, 101:4, 101:10, 102:2, 102:9, 103:19, 106:18, 107:11, 116:5 Real [1] - 64:13 realise [1] - 39:29 realising [1] - 112:10 realistic [3] - 44:22, 89:10, 91:7 realistically [1] - 33:20 reality [2] - 7:26, 72:28 really [2] - 47:22, 103:17 rear [1] - 74:18 reason [11] - 8:7, 10:17, 21:14, 30:23,</p>	<p>33:1, 45:24, 46:11, 83:29, 84:15, 104:18, 114:13 reasonable [8] - 58:21, 58:22, 85:26, 95:2, 95:10, 106:2, 106:4, 106:10 reasonably [1] - 94:24 reasoned [2] - 102:14, 102:15 reasons [15] - 6:26, 8:6, 10:3, 11:5, 15:19, 23:23, 32:23, 43:24, 45:7, 46:16, 48:29, 69:24, 94:12, 94:13 reassurance [1] - 42:11 reassure [2] - 87:6, 111:17 receipt [2] - 20:28, 91:24 receive [3] - 5:18, 25:24, 32:24 received [8] - 16:13, 16:28, 16:29, 17:1, 23:4, 25:20, 27:26, 43:3 receives [1] - 22:15 recent [5] - 97:8, 97:14, 103:21, 115:4, 116:27 recently [4] - 17:17, 29:11, 39:19, 48:22 recognise [5] - 15:16, 18:13, 19:18, 33:18, 55:11 recognised [3] - 116:14, 118:3, 119:5 recognising [1] - 42:11 recognition [1] - 104:18 record [4] - 4:23, 5:2, 30:17, 31:18 recorded [1] - 68:14 recording [4] - 47:18, 76:11, 76:16, 78:13 recordings [1] - 68:19 records [1] - 82:15 recourse [1] - 109:27 recruiting [1] - 109:18 redacted [1] - 26:16 redaction [3] - 21:3, 21:4, 21:5 redactions [3] - 8:20, 17:14, 25:29 reduce [1] - 117:25</p>
Q			<p>qualify [1] - 101:4 quality [2] - 70:19, 109:12 quantity [1] - 16:13 quarter [1] - 43:15 queried [2] - 105:29, 110:6 queries [4] - 91:28, 92:19, 93:26, 95:22 quite [8] - 69:18, 79:1, 80:1, 87:20, 96:12, 96:13, 109:8, 111:4 quotation [3] - 84:17, 99:11, 101:18 quote [5] - 18:24, 50:25, 54:5, 59:23, 110:13 quoted [3] - 98:14, 99:22, 110:18</p>	

<p>reduced [1] - 11:7</p> <p>refer [3] - 71:5, 90:11, 108:28</p> <p>reference [18] - 14:7, 16:15, 22:15, 32:14, 57:13, 67:8, 68:3, 68:4, 70:6, 76:1, 78:19, 78:20, 80:27, 82:19, 82:21, 84:4, 97:11, 119:9</p> <p>Reference [11] - 7:24, 7:28, 13:16, 25:21, 33:18, 33:23, 38:20, 39:26, 40:8, 84:2, 109:7</p> <p>referenced [3] - 10:8, 11:14, 117:8</p> <p>references [1] - 65:12</p> <p>referred [5] - 72:7, 75:20, 82:26, 95:24, 114:5</p> <p>refers [4] - 66:19, 67:15, 71:2, 71:12</p> <p>reflect [2] - 1:25, 14:2</p> <p>reflected [1] - 76:27</p> <p>reflection [1] - 32:20</p> <p>reflects [2] - 9:17, 32:28</p> <p>refusal [1] - 106:25</p> <p>regard [4] - 12:21, 49:28, 54:8, 116:18</p> <p>region [1] - 20:16</p> <p>register [1] - 38:6</p> <p>registration [1] - 78:12</p> <p>regular [1] - 20:22</p> <p>regularly [2] - 22:8, 51:20</p> <p>rehearse [2] - 23:22, 36:26</p> <p>rehearsed [1] - 83:14</p> <p>rehearsing [1] - 48:28</p> <p>relate [2] - 56:27, 69:3</p> <p>related [4] - 7:12, 68:26, 87:13, 91:8</p> <p>related-terrorist [1] - 91:8</p> <p>relates [6] - 15:13, 23:10, 38:28, 47:28, 49:25, 84:25</p> <p>relating [6] - 12:9, 17:20, 22:24, 28:26, 46:24, 105:17</p> <p>relation [45] - 1:14, 1:16, 4:18, 5:7, 5:8, 10:22, 11:20, 11:21, 12:14, 14:3, 14:29,</p>	<p>18:19, 22:23, 23:7, 24:7, 26:2, 29:24, 36:15, 38:6, 38:27, 47:2, 50:21, 58:15, 80:8, 82:29, 83:2, 83:10, 87:5, 92:9, 92:28, 93:1, 93:12, 93:16, 94:2, 95:7, 95:23, 96:29, 106:15, 106:16, 107:25, 109:21, 109:26, 114:27, 115:10, 117:3</p> <p>relationship [2] - 22:14, 46:25</p> <p>relationships [3] - 18:28, 19:19, 29:26</p> <p>relatively [5] - 21:12, 21:20, 21:22, 58:26, 59:4</p> <p>relatives [1] - 75:15</p> <p>relentless [1] - 29:21</p> <p>relevance [3] - 8:19, 17:13, 25:21</p> <p>relevant [22] - 10:25, 11:6, 11:9, 12:3, 12:20, 19:1, 26:13, 26:15, 29:22, 38:11, 39:26, 49:9, 49:11, 50:4, 52:3, 61:21, 109:1, 110:2, 110:10, 115:20, 117:26, 118:2</p> <p>reliance [1] - 84:10</p> <p>relied [2] - 47:15, 47:16</p> <p>relies [2] - 53:27, 54:26</p> <p>rely [3] - 58:5, 108:18, 109:13</p> <p>relying [2] - 99:29, 108:10</p> <p>remain [4] - 22:7, 60:27, 62:5, 101:24</p> <p>remainder [1] - 35:28</p> <p>remained [1] - 116:17</p> <p>remaining [1] - 80:13</p> <p>remains [2] - 14:10, 38:18</p> <p>remarks [3] - 31:19, 33:9, 46:10</p> <p>remind [2] - 1:11, 61:17</p> <p>reminder [1] - 25:16</p> <p>remote [1] - 1:16</p> <p>removing [1] - 35:29</p> <p>repeat [3] - 27:9, 47:23, 57:19</p> <p>repeated [1] - 106:11</p> <p>repetition [2] - 11:2, 29:15</p>	<p>replicated [1] - 77:11</p> <p>reply [1] - 55:26</p> <p>Report [3] - 20:6, 28:15, 69:11</p> <p>report [18] - 11:27, 12:3, 32:2, 32:5, 32:7, 33:5, 41:12, 45:16, 45:21, 45:23, 46:2, 47:9, 47:14, 69:16, 69:17, 70:22, 74:3, 99:21</p> <p>reported [2] - 47:9, 74:8</p> <p>reporting [12] - 32:27, 43:19, 43:20, 44:20, 44:23, 46:19, 46:28, 47:4, 47:6, 76:24, 76:28, 110:15</p> <p>Reports [1] - 99:25</p> <p>reports [4] - 11:22, 45:28, 77:6, 99:13</p> <p>represent [1] - 48:2</p> <p>representative [5] - 113:23, 114:2, 114:8, 114:14, 114:19</p> <p>representatives [3] - 18:29, 19:10, 33:19</p> <p>representing [1] - 53:14</p> <p>represents [2] - 55:21, 55:23</p> <p>Republic [9] - 6:27, 8:9, 12:18, 23:11, 32:17, 32:25, 45:19, 45:25, 46:13</p> <p>republican [8] - 65:19, 70:7, 75:9, 75:15, 87:28, 88:22, 88:28, 98:21</p> <p>Republican [4] - 54:6, 64:10, 64:19, 73:22</p> <p>republicans [10] - 68:1, 70:25, 71:23, 81:22, 89:9, 89:11, 89:20, 90:4, 90:17, 105:3</p> <p>reputation [1] - 103:22</p> <p>request [5] - 4:21, 16:15, 17:27, 18:21, 29:24</p> <p>requested [1] - 91:6</p> <p>requesting [3] - 93:28, 93:29, 111:3</p> <p>requests [10] - 23:3, 25:3, 27:26, 28:26, 29:6, 29:29, 30:8, 38:12, 38:13, 109:29</p> <p>require [5] - 17:4, 19:28, 31:4, 48:14,</p>	<p>95:2</p> <p>required [16] - 2:11, 14:10, 14:18, 14:23, 14:24, 15:4, 17:12, 20:27, 21:1, 26:6, 36:5, 36:12, 38:8, 41:11, 77:20, 77:21</p> <p>requirement [5] - 56:17, 92:27, 99:5, 100:17, 108:2</p> <p>requirements [2] - 1:26, 30:20</p> <p>requires [9] - 15:18, 20:12, 34:7, 34:8, 34:28, 35:12, 37:25, 40:4, 40:11</p> <p>requiring [1] - 77:17</p> <p>research [1] - 89:29</p> <p>reservations [1] - 84:10</p> <p>reserved [1] - 7:3</p> <p>residential [1] - 71:24</p> <p>residual [1] - 116:18</p> <p>resolution [8] - 8:29, 9:3, 14:7, 14:13, 15:4, 18:2, 41:28</p> <p>resolve [3] - 15:3, 54:17, 99:27</p> <p>resolved [4] - 4:14, 14:6, 37:20, 39:3</p> <p>resolving [1] - 14:18</p> <p>resonates [1] - 97:21</p> <p>resource [1] - 21:13</p> <p>resourced [2] - 30:20, 103:8</p> <p>resources [1] - 42:16</p> <p>resourcing [1] - 31:6</p> <p>respect [12] - 7:2, 20:4, 53:17, 53:18, 53:22, 55:11, 76:29, 93:7, 93:21, 108:14, 113:17, 115:21</p> <p>respectful [6] - 88:6, 92:23, 95:4, 96:2, 107:9, 112:16</p> <p>respectfully [27] - 60:9, 61:3, 62:17, 69:19, 72:26, 73:17, 83:9, 83:26, 85:6, 85:9, 88:12, 90:11, 91:12, 92:10, 93:5, 94:14, 94:16, 95:11, 98:12, 102:24, 103:28, 105:4, 107:18, 109:10, 109:22, 110:16, 110:26</p> <p>respective [2] - 18:11, 105:22</p> <p>respectively [1] -</p>	<p>104:25</p> <p>respects [2] - 12:6, 111:26</p> <p>response [6] - 13:19, 23:20, 23:22, 23:28, 92:24, 95:10</p> <p>responses [3] - 14:12, 29:7, 55:26</p> <p>responsibility [4] - 10:9, 54:1, 64:14, 115:17</p> <p>responsible [5] - 9:19, 10:6, 15:7, 29:18, 75:20</p> <p>responsibly [1] - 13:27</p> <p>responsive [2] - 17:11, 38:12</p> <p>rest [2] - 46:1, 85:14</p> <p>restart [1] - 119:29</p> <p>Restriction [8] - 1:12, 4:29, 9:1, 33:16, 35:13, 36:2, 41:26, 48:6</p> <p>restriction [5] - 35:18, 35:20, 48:25, 118:9, 118:13</p> <p>result [19] - 14:26, 41:20, 42:15, 49:16, 51:14, 61:7, 65:25, 68:1, 68:5, 72:28, 74:8, 79:26, 92:16, 92:26, 97:15, 104:26, 105:8, 107:17, 114:11</p> <p>resulted [1] - 60:26</p> <p>results [1] - 97:26</p> <p>RESUMED [4] - 1:1, 6:5, 31:25, 85:20</p> <p>resumption [1] - 62:9</p> <p>retire [1] - 79:25</p> <p>retired [9] - 61:26, 80:26, 81:13, 81:23, 82:4, 82:26, 83:21, 92:15, 92:20</p> <p>retirement [3] - 62:4, 64:28, 108:23</p> <p>retrospective [1] - 57:21</p> <p>return [5] - 27:17, 33:12, 43:1, 67:11, 76:25</p> <p>returned [2] - 43:17, 72:23</p> <p>returning [1] - 29:25</p> <p>revelation [1] - 7:7</p> <p>review [11] - 5:18, 6:29, 12:28, 20:23, 20:29, 21:20, 22:1, 22:14, 51:28, 95:29, 104:4</p>
--	---	---	---	--

<p>reviewed [2] - 8:19, 102:11</p> <p>reviewer [1] - 69:11</p> <p>reviewer's [1] - 69:15</p> <p>revisit [1] - 11:17</p> <p>revolution [1] - 40:2</p> <p>Reynolds [2] - 61:27, 82:8</p> <p>rifle [1] - 71:9</p> <p>rifles [1] - 69:2</p> <p>right-hand [1] - 63:14</p> <p>rightly [1] - 39:2</p> <p>rights [5] - 50:6, 50:9, 55:1, 110:18, 110:19</p> <p>rise [5] - 6:1, 31:22, 34:11, 35:2, 44:28</p> <p>risk [46] - 4:26, 7:16, 11:1, 29:15, 31:10, 34:9, 34:13, 52:13, 54:1, 59:1, 59:8, 59:9, 59:14, 59:19, 83:12, 83:18, 83:28, 85:8, 91:16, 91:17, 91:18, 92:15, 93:3, 93:4, 93:8, 94:11, 97:17, 101:3, 101:24, 102:2, 102:9, 106:18, 106:21, 106:26, 107:12, 107:14, 107:17, 111:29, 116:5, 117:26, 118:24, 118:29</p> <p>risks [4] - 60:15, 102:2, 114:17, 118:28</p> <p>road [1] - 15:2</p> <p>Road [2] - 69:4, 71:7</p> <p>roadside [1] - 71:24</p> <p>robustly [1] - 35:1</p> <p>Rodgers [1] - 110:23</p> <p>role [6] - 55:7, 61:13, 62:5, 80:11, 83:23, 115:9</p> <p>roles [4] - 19:3, 109:19, 113:28, 118:18</p> <p>rolling [1] - 8:16</p> <p>Ronan [1] - 66:19</p> <p>room [7] - 1:15, 1:17, 2:1, 3:16, 6:13, 6:24, 44:21</p> <p>Roseanne [1] - 104:10</p> <p>round [2] - 72:23, 78:18</p> <p>rounds [1] - 71:8</p> <p>routinely [3] - 73:2, 77:13, 112:4</p> <p>RUC [7] - 53:17,</p>	<p>56:28, 88:26, 90:18, 90:23, 91:5</p> <p>rule [1] - 34:9</p> <p>Rule [1] - 27:27</p> <p>Rules [1] - 27:28</p> <p>ruling [11] - 6:29, 14:10, 26:2, 26:5, 35:24, 35:27, 36:11, 49:3, 50:14, 105:13</p> <p>rulings [2] - 50:3, 105:14</p> <p>running [3] - 44:14, 63:2, 63:3</p> <p>runs [2] - 63:11, 63:12</p> <p>rushed [2] - 7:22, 85:28</p>	<p>91:7, 106:7</p> <p>scroll [1] - 74:22</p> <p>scrutiny [1] - 108:2</p> <p>seats [2] - 56:2, 56:18</p> <p>second [37] - 1:22, 2:14, 2:28, 4:17, 9:12, 10:17, 15:12, 16:4, 23:10, 24:2, 46:2, 47:27, 49:7, 55:19, 57:8, 59:7, 63:1, 63:13, 67:17, 68:4, 72:9, 77:26, 79:13, 83:5, 83:6, 93:12, 97:3, 99:8, 100:26, 101:12, 101:16, 102:25, 105:10, 111:4, 111:15, 112:8</p> <p>secondly [6] - 58:5, 59:10, 74:12, 90:23, 103:21, 109:13</p> <p>seconds [1] - 47:1</p> <p>secret [1] - 51:20</p> <p>Secretary [6] - 41:21, 42:2, 42:5, 115:9, 115:16, 115:18</p> <p>secreted [2] - 81:22, 82:20</p> <p>section [3] - 74:23, 87:26, 89:2</p> <p>Section [4] - 34:7, 35:13, 48:6, 117:24</p> <p>sector [1] - 77:16</p> <p>secure [5] - 20:2, 37:26, 37:27, 40:4, 40:24</p> <p>secured [3] - 39:19, 39:20, 40:20</p> <p>securely [1] - 40:6</p> <p>security [30] - 33:25, 34:17, 40:5, 61:6, 62:3, 70:24, 73:1, 73:14, 77:9, 77:17, 77:19, 87:21, 93:17, 96:16, 97:16, 97:18, 97:22, 97:27, 97:28, 97:29, 98:5, 98:7, 102:26, 112:4, 112:5, 115:10, 115:18, 117:27</p> <p>Security [4] - 70:3, 88:8, 88:9, 97:1</p> <p>Security" [1] - 70:4</p> <p>see [57] - 13:3, 31:22, 48:27, 56:7, 60:11, 64:6, 64:21, 64:27, 65:2, 65:23, 65:26, 66:1, 66:8, 67:3, 67:8, 67:14, 68:2, 68:11, 69:14, 72:5, 72:10, 72:19, 73:28, 74:14, 74:23,</p>	<p>74:27, 75:19, 75:22, 76:8, 76:21, 76:23, 77:1, 77:25, 80:27, 81:4, 81:5, 81:7, 81:19, 81:29, 82:19, 82:21, 83:3, 83:13, 84:16, 86:9, 86:10, 86:12, 86:27, 87:25, 98:19, 101:15, 102:6, 103:16, 103:21, 104:1, 117:27, 119:9</p> <p>seeing [3] - 17:17, 86:29, 87:8</p> <p>seek [4] - 30:1, 34:24, 46:12, 113:28</p> <p>seeking [5] - 9:29, 54:24, 78:11, 107:28, 113:21</p> <p>seeks [1] - 48:18</p> <p>seem [3] - 42:25, 107:25, 119:28</p> <p>selected [1] - 8:5</p> <p>self [1] - 80:5</p> <p>self-evident [1] - 80:5</p> <p>send [1] - 25:25</p> <p>senior [3] - 28:21, 55:7, 80:3</p> <p>seniority [1] - 80:12</p> <p>sense [4] - 18:12, 52:14, 86:9, 86:12</p> <p>sensible [2] - 86:2, 86:3</p> <p>sensitive [19] - 17:5, 18:3, 18:5, 18:7, 19:17, 19:18, 19:28, 20:1, 20:4, 20:13, 26:9, 35:20, 35:26, 36:21, 61:13, 109:18, 111:26, 113:28, 118:18</p> <p>sensitivities [3] - 39:6, 114:16, 118:15</p> <p>sensitivity [5] - 26:4, 33:8, 33:25, 40:6, 46:23</p> <p>sent [1] - 29:7</p> <p>sentence [4] - 7:14, 9:12, 70:7</p> <p>sentences [1] - 70:16</p> <p>sentiment [1] - 37:17</p> <p>sentiments [2] - 16:26, 16:28</p> <p>separate [4] - 4:13, 48:9, 50:12, 86:18</p> <p>separated [1] - 110:24</p> <p>separately [2] - 48:16, 107:19</p> <p>September [16] - 7:9,</p>	<p>7:15, 8:4, 8:26, 8:28, 9:8, 9:14, 10:20, 13:4, 13:7, 37:6, 41:28, 45:14, 76:13, 82:10, 104:12</p> <p>sequence [3] - 48:15, 63:7, 67:25</p> <p>Sergeant [1] - 28:9</p> <p>series [2] - 16:23, 70:16</p> <p>serious [9] - 32:5, 47:11, 51:17, 60:16, 60:24, 65:23, 71:15, 116:5, 116:12</p> <p>seriously [3] - 65:9, 71:6, 80:25</p> <p>servant [1] - 67:28</p> <p>served [2] - 51:21, 114:24</p> <p>Service [3] - 43:4, 47:29, 78:7</p> <p>service [8] - 60:16, 61:7, 64:29, 65:3, 79:7, 79:25, 83:23, 93:17</p> <p>Services [3] - 88:8, 88:9, 97:1</p> <p>services [1] - 12:16</p> <p>servicing [10] - 19:3, 72:17, 72:29, 73:8, 73:14, 80:27, 81:6, 81:13, 83:21, 83:29</p> <p>set [20] - 5:8, 9:16, 13:5, 15:18, 30:7, 30:22, 35:6, 35:17, 36:25, 36:26, 37:21, 51:3, 55:15, 58:12, 61:4, 80:29, 112:9, 113:24, 115:11, 116:2</p> <p>sets [5] - 13:25, 24:6, 58:20, 61:2, 61:24</p> <p>setting [6] - 29:1, 55:13, 61:2, 66:6, 92:29, 93:15</p> <p>seven [3] - 61:10, 62:1, 74:29</p> <p>several [2] - 32:23, 46:15</p> <p>Shandon [1] - 72:13</p> <p>shape [1] - 94:22</p> <p>share [2] - 19:9, 20:1</p> <p>shared [6] - 11:28, 18:23, 37:2, 41:7, 87:2, 108:26</p> <p>sharing [1] - 20:27</p> <p>Shea [2] - 61:27, 82:7</p> <p>shift [1] - 10:12</p> <p>shooting [5] - 71:7, 74:1, 74:26, 83:14, 83:25</p>
S				
	<p>s.17 [1] - 49:13</p> <p>sadly [1] - 68:5</p> <p>said.. [2] - 32:11, 45:14</p> <p>sake [1] - 27:2</p> <p>Sample [1] - 9:1</p> <p>sample [8] - 2:16, 9:4, 35:22, 35:23, 37:1, 49:3, 56:26, 93:22</p> <p>satisfactory [3] - 34:25, 39:13, 41:6</p> <p>satisfied [11] - 34:8, 92:8, 94:18, 99:3, 103:12, 105:25, 106:19, 107:11, 107:14, 109:25</p> <p>satisfy [1] - 100:26</p> <p>save [2] - 3:25, 55:15</p> <p>Saville [3] - 108:11, 110:6, 110:26</p> <p>scale [1] - 25:16</p> <p>scales [1] - 26:13</p> <p>scanned [1] - 37:25</p> <p>scenes [1] - 39:3</p> <p>scheduled [4] - 32:10, 45:11, 46:6, 112:19</p> <p>schedules [1] - 16:16</p> <p>scheme [2] - 35:18, 35:19</p> <p>scientists [1] - 11:25</p> <p>scope [12] - 4:12, 4:15, 5:23, 6:13, 11:21, 13:10, 13:14, 14:3, 14:6, 14:11, 14:22, 14:26</p> <p>screen [2] - 48:14, 63:19</p> <p>screening [3] - 48:8,</p>			

<p>shootings [1] - 64:18 SHORT [2] - 6:5, 31:25 short [15] - 4:15, 6:2, 9:16, 13:20, 19:4, 25:11, 26:28, 51:18, 53:19, 55:26, 55:27, 69:22, 80:6, 85:14, 112:21 shortly [3] - 39:20, 45:3, 79:25 shot [7] - 64:11, 71:6, 74:7, 79:16, 79:19, 80:25, 81:12 shots [3] - 67:20, 74:3, 74:29 shows [1] - 103:18 side [7] - 37:16, 39:15, 40:4, 42:16, 80:29, 81:4, 104:21 signatures [1] - 87:4 significance [1] - 93:27 significant [13] - 16:13, 19:16, 28:11, 28:15, 29:11, 52:27, 58:18, 60:26, 98:28, 100:11, 105:7, 114:11, 114:20 significantly [2] - 101:1, 109:5 signing [1] - 15:22 similar [8] - 20:23, 74:24, 101:14, 104:10, 114:9, 114:12, 114:15, 114:17 similarly [4] - 112:29, 113:27, 117:7, 118:17 simple [2] - 99:1, 104:29 simplify [1] - 36:15 simply [13] - 8:26, 13:15, 18:9, 18:16, 30:26, 55:2, 87:2, 109:8, 111:9, 111:12, 115:1, 116:26, 118:21 simultaneously [1] - 30:10 single [6] - 25:26, 46:28, 55:4, 55:5, 62:24, 88:7 sit [1] - 9:13 site [2] - 12:2, 12:22 sites [1] - 39:7 sits [1] - 2:4 sitting [1] - 53:1 situation [10] - 36:23, 36:29, 40:26, 73:11, 76:24, 96:16,</p>	<p>97:16, 97:22, 98:7, 102:26 six [10] - 7:16, 32:10, 45:11, 46:5, 61:10, 61:11, 61:23, 70:24, 82:8, 101:17 sixth [1] - 72:19 size [1] - 17:27 skeleton [2] - 77:8, 108:28 slightly [4] - 93:9, 99:8, 115:24, 119:2 slowly [1] - 69:27 small [3] - 20:18, 60:18, 75:24 smooth [1] - 39:12 snapshot [1] - 62:13 so-called [1] - 13:19 social [3] - 61:15, 90:1, 108:27 socialise [1] - 89:27 Soering [1] - 101:28 Soering.. [1] - 101:26 soft [1] - 56:23 soldiers [3] - 64:11, 84:21, 105:15 sole [1] - 47:8 solution [3] - 18:20, 41:13, 41:25 solutions [1] - 38:11 some.. [1] - 52:19 someone [1] - 78:11 sometimes [6] - 26:6, 29:28, 41:11, 51:18, 88:15, 90:26 somewhat [1] - 84:1 son [1] - 79:18 soon [2] - 9:4, 30:24 sooner [1] - 14:14 sorry [4] - 56:5, 68:8, 77:4, 78:28 sort [2] - 44:14, 94:21 sought [7] - 21:4, 29:4, 30:24, 53:21, 53:23, 117:15, 118:1 source [18] - 46:29, 57:14, 60:2, 62:19, 64:6, 66:18, 68:2, 69:8, 78:19, 79:29, 81:16, 83:13, 84:11, 85:7, 90:12, 93:7, 106:20, 108:18 sources [2] - 57:5, 92:6 South [2] - 46:7, 77:12 Southey [3] - 54:15, 54:22, 55:20 space [6] - 1:16,</p>	<p>1:25, 1:27, 1:28, 1:29, 2:2 Spanish [2] - 69:23, 69:25 speaker [2] - 3:19, 3:26 speaking [1] - 31:8 special [3] - 48:8, 48:17, 119:5 Special [3] - 6:29, 57:3, 60:20 specific [6] - 21:4, 60:13, 68:3, 94:12, 114:21, 114:23 specifically [2] - 110:24, 119:24 spectrum [1] - 93:9 speculate [1] - 89:11 speed [2] - 69:27, 108:25 spent [1] - 108:22 spirit [1] - 19:19 spoken [1] - 53:13 sponsoring [2] - 39:23, 42:5 stable [1] - 79:24 staff [4] - 60:17, 113:27, 117:26, 118:16 stage [16] - 2:23, 4:22, 14:11, 14:22, 16:24, 20:8, 22:22, 38:5, 39:12, 40:3, 40:18, 44:1, 57:19, 79:24, 107:9, 117:22 stand [4] - 26:21, 31:6, 56:20, 111:13 start [10] - 8:26, 9:9, 10:20, 10:26, 13:7, 15:29, 16:9, 40:17, 44:27, 86:6 started [5] - 5:27, 11:1, 42:17, 43:19, 112:22 starting [13] - 9:22, 9:23, 13:22, 34:1, 51:9, 64:28, 80:1, 113:12, 113:16, 117:12, 118:1, 118:10, 118:26 State [6] - 22:28, 24:10, 42:2, 115:9, 115:16, 115:19 state [5] - 6:27, 23:13, 30:25, 41:5, 86:5 statement [27] - 18:22, 18:25, 19:13, 20:10, 21:26, 22:5, 22:11, 28:26, 29:1, 29:6, 29:11, 30:8,</p>	<p>53:19, 53:20, 57:8, 57:9, 59:14, 60:7, 75:19, 86:20, 90:12, 109:15, 113:15, 114:5, 114:23, 119:8, 119:10 statements [10] - 4:22, 25:3, 27:27, 29:24, 37:18, 38:3, 61:1, 87:5, 93:15, 108:19 states [4] - 64:3, 68:16, 87:26, 89:5 stating [5] - 7:16, 34:13, 88:24, 102:9, 102:26 Station [1] - 76:17 station [4] - 71:7, 75:25, 76:11, 78:12 statutory [3] - 7:26, 24:12, 34:3 staying [1] - 61:14 stenographer [1] - 85:14 step [2] - 95:10, 106:4 Stephen [1] - 64:9 Stephens [2] - 103:25, 104:2 stepping [1] - 38:16 steps [14] - 19:5, 20:20, 20:27, 21:12, 36:12, 36:26, 42:12, 58:21, 58:22, 66:7, 94:21, 94:24, 95:2, 106:2 still [8] - 12:27, 17:7, 17:18, 31:7, 40:21, 41:7, 46:12, 85:25 stone [1] - 38:16 stop [3] - 86:3, 119:29 Strabane [1] - 71:23 straightforward [3] - 34:14, 40:17, 58:26 strands [2] - 12:13, 12:22 Street [1] - 76:2 stress [2] - 8:7, 62:12 strict [1] - 26:12 strictly [1] - 55:26 striking [1] - 52:5 strong [1] - 18:27 struck [1] - 16:26 structure [1] - 36:25 structures [1] - 29:2 studied [1] - 49:16 sub [3] - 70:28, 77:27, 88:19 sub-paragraphs [1] -</p>	<p>70:28 subject [12] - 16:22, 26:5, 28:25, 35:12, 37:13, 38:29, 39:5, 40:7, 66:9, 66:13, 86:8, 103:7 subjected [1] - 52:9 subjective [4] - 61:21, 104:27, 108:9, 108:14 SUBMISSION [6] - 1:7, 56:14, 113:9, 121:4, 121:7, 121:9 submission [19] - 50:25, 84:14, 92:1, 95:25, 96:10, 96:25, 100:7, 102:22, 102:23, 103:29, 105:12, 111:1, 111:6, 111:8, 111:12, 111:15, 116:3, 117:1, 118:8 submissions [70] - 2:10, 2:17, 2:19, 2:21, 2:23, 14:16, 14:22, 24:19, 37:9, 38:25, 42:26, 43:2, 44:6, 46:15, 49:16, 49:20, 50:23, 50:26, 53:16, 54:14, 54:20, 54:22, 54:25, 55:16, 55:24, 55:27, 56:2, 56:20, 57:19, 58:2, 58:12, 58:13, 67:11, 85:24, 85:28, 86:6, 86:8, 86:16, 88:5, 92:23, 95:4, 96:5, 96:19, 98:13, 98:19, 99:17, 101:16, 101:19, 103:17, 106:14, 109:10, 110:3, 110:4, 110:13, 110:29, 112:17, 112:25, 113:4, 113:12, 113:13, 113:25, 115:1, 115:2, 115:12, 117:9, 117:13, 117:28, 118:20, 118:27, 119:20 submitted [1] - 49:2 subsequent [8] - 10:26, 14:12, 14:29, 28:13, 49:5, 71:18, 86:26, 91:24 subsequently [2] - 37:10, 48:16 substantial [11] - 16:28, 17:16, 27:7, 27:12, 29:28, 35:24, 41:23, 69:18, 87:15, 100:8, 102:1 substantively [1] -</p>
--	---	---	--	--

<p>119:19 subtitle [3] - 60:12, 70:4, 96:26 subversive [1] - 89:28 succeed [1] - 97:15 successful [5] - 83:16, 83:17, 92:14, 96:14, 106:24 successfully [3] - 89:21, 90:5, 90:8 suffered [2] - 51:14, 78:25 sufficient [7] - 31:9, 54:17, 54:29, 89:22, 90:6, 100:26, 111:25 sufficiently [1] - 20:2 suggest [6] - 9:27, 30:1, 42:29, 83:26, 91:12, 92:10 suggested [3] - 47:7, 54:16, 94:25 suggestion [7] - 14:11, 86:9, 92:11, 93:13, 111:22, 112:6, 112:7 suitable [1] - 36:29 suited [1] - 41:17 suits [1] - 85:15 summaries [3] - 11:9, 11:11, 11:17 summarise [1] - 96:9 summarised [3] - 15:10, 36:28, 73:26 summarising [1] - 57:1 summary [5] - 11:7, 74:15, 74:23, 87:25, 97:21 summing [1] - 106:16 summing-up [1] - 106:16 Superintendent [2] - 28:20, 86:20 Superintendent's [1] - 109:15 supplied [1] - 57:14 support [6] - 16:28, 34:29, 54:27, 57:7, 57:11, 58:5 supported [1] - 55:8 Supreme [2] - 115:4, 115:8 surely [1] - 30:11 surge [3] - 42:15, 42:17, 64:10 surprise [1] - 40:7 surprising [1] - 103:10 surround [1] - 39:7</p>	<p>surrounded [1] - 29:2 survived [1] - 79:22 survivor [2] - 3:9, 37:8 survivors [2] - 1:28, 34:22 suspect [1] - 72:19 suspected [1] - 29:13 suspects [1] - 26:3 suspicion [1] - 29:15 sustained [1] - 51:17 Suter [3] - 3:28, 4:1, 44:13 suter [1] - 44:11 swifter [1] - 22:1 swiftly [1] - 19:7 switch [1] - 62:18 switched [3] - 3:16, 3:23, 56:4 sympathise [1] - 7:20 system [8] - 3:19, 28:28, 37:27, 40:20, 40:24, 41:16, 77:16, 98:1 System [1] - 28:28 systematically [1] - 80:8 systems [2] - 20:3, 35:12</p>	<p>11:25, 34:29, 38:9, 60:18 Team [43] - 2:7, 4:6, 5:2, 5:11, 9:27, 10:24, 11:13, 12:5, 12:20, 13:1, 13:26, 14:2, 16:25, 17:10, 17:24, 21:15, 23:20, 25:4, 25:7, 25:17, 28:17, 29:8, 29:21, 30:18, 30:26, 35:5, 35:17, 36:13, 36:27, 37:25, 37:27, 39:10, 39:14, 40:22, 42:15, 43:18, 48:20, 48:23, 49:8, 51:27, 59:3, 79:8, 80:4 Team's [4] - 11:24, 14:5, 14:9, 18:21 teams [1] - 19:1 technically [1] - 38:10 techniques [2] - 10:22, 116:22 teething [2] - 5:25, 44:12 ten [1] - 1:13 termed [4] - 12:10, 29:16, 33:23 terminals [2] - 40:11, 41:8 Terms [12] - 7:24, 7:28, 13:16, 25:21, 33:18, 33:23, 38:19, 39:26, 40:8, 54:29, 84:2, 109:7 terms [12] - 19:21, 21:2, 33:5, 57:10, 65:8, 97:26, 98:8, 99:1, 102:9, 103:19, 104:29, 114:11 territory [1] - 96:22 Terrorism [1] - 53:29 terrorism [8] - 68:28, 82:14, 82:17, 87:13, 91:8, 116:9, 116:21, 116:24 terrorist [14] - 62:9, 68:26, 77:1, 77:3, 78:9, 79:9, 82:3, 82:13, 101:23, 103:9, 116:12, 116:15, 116:17, 116:18 terrorist-related [1] - 68:26 terrorists [2] - 52:10, 78:15 test [39] - 34:7, 34:8, 35:1, 58:3, 58:10, 58:26, 59:7, 61:23, 83:11, 85:8, 91:15, 92:9, 92:11, 93:7,</p>	<p>94:15, 94:18, 94:20, 95:12, 96:29, 99:2, 100:27, 102:7, 103:11, 105:25, 106:15, 106:29, 107:10, 107:14, 107:18, 107:21, 107:24, 109:22, 109:25, 109:27, 110:11, 114:28, 116:7, 119:2 testing [1] - 35:21 tests [2] - 93:19, 94:22 thankfully [4] - 73:13, 74:7, 74:19, 90:26 THE [10] - 1:1, 6:5, 31:25, 43:11, 85:20, 120:5, 121:6, 121:8, 121:10 theme [1] - 61:5 themselves [1] - 53:13 THEN [2] - 120:5, 121:10 theoretical [1] - 14:8 thereafter [1] - 79:25 therefore [7] - 32:27, 43:27, 52:11, 88:11, 90:18, 103:10, 110:25 they've [1] - 18:23 thinking [2] - 34:21, 50:3 thinks [1] - 112:22 third [11] - 4:20, 18:3, 18:11, 18:19, 26:14, 55:20, 73:28, 73:29, 82:6, 83:6, 90:27 thirdly [3] - 3:8, 58:7, 59:17 Thompson [2] - 115:5, 115:26 thousands [1] - 36:1 threat [37] - 27:15, 51:19, 51:24, 52:10, 52:12, 52:24, 60:24, 70:8, 70:17, 75:19, 81:11, 84:4, 84:7, 84:26, 84:28, 85:8, 87:13, 89:3, 91:8, 91:15, 91:23, 92:5, 92:20, 93:23, 98:20, 98:25, 100:22, 100:24, 103:11, 105:3, 106:20, 108:19, 111:18, 111:20, 116:9, 116:12, 116:17 threats [7] - 60:12, 60:15, 61:8, 66:10,</p>	<p>72:28, 101:9, 103:7 three [11] - 25:2, 35:6, 50:11, 51:10, 53:21, 57:3, 59:24, 68:19, 68:28, 90:22, 102:12 threshold [1] - 59:5 throughout [1] - 84:8 thrown [1] - 71:1 THURSDAY [1] - 1:1 Thursday [2] - 7:2, 45:12 tie [1] - 89:28 timely [4] - 5:12, 30:14, 30:21, 38:22 timetable [1] - 37:21 timetables [1] - 30:7 tirelessly [1] - 30:12 title [14] - 64:3, 66:19, 67:14, 68:12, 69:14, 70:2, 73:19, 73:27, 75:7, 76:9, 77:27, 78:23, 80:16, 88:20 TO [1] - 120:6 Toal [2] - 54:23, 55:22 today [28] - 1:10, 2:4, 2:5, 2:14, 3:6, 3:14, 4:1, 4:4, 4:13, 5:27, 7:7, 13:21, 14:15, 15:12, 15:22, 30:17, 32:28, 38:27, 43:16, 44:19, 47:26, 54:20, 54:25, 56:26, 61:4, 82:3, 113:5 today's [2] - 25:2, 47:22 together [7] - 12:13, 12:17, 12:19, 12:23, 29:17, 35:6, 89:28 tolerance [1] - 94:12 tomorrow [6] - 54:8, 55:13, 86:1, 86:6, 86:26, 120:1 took [6] - 16:5, 20:19, 37:19, 43:16, 66:8, 95:15 top [10] - 65:2, 65:15, 67:17, 71:11, 72:9, 79:13, 80:3, 82:22, 87:11, 93:8 topic [12] - 2:6, 2:9, 2:14, 4:3, 4:7, 5:8, 5:22, 25:2, 25:3, 27:20, 38:5, 47:27 topics [7] - 2:6, 3:10, 5:22, 6:10, 6:12, 33:15, 58:2 touch [7] - 56:23, 58:7, 58:11, 96:21,</p>
T				
	<p>tab [10] - 51:7, 51:29, 53:2, 53:16, 53:28, 63:3, 63:11, 63:12, 63:17 table [4] - 57:1, 73:27, 74:24, 96:9 tabs [1] - 62:25 tactics [1] - 116:22 talks [1] - 95:9 target [6] - 54:6, 70:12, 81:8, 87:18, 87:23, 88:29 targeted [3] - 67:29, 80:2, 80:4 targeting [6] - 61:26, 62:9, 82:4, 89:22, 90:6, 103:8 targets [11] - 75:10, 75:17, 80:9, 83:25, 87:23, 90:19, 90:24, 90:29, 92:13, 101:24, 106:25 Tart [1] - 12:2 task [1] - 57:20 team [6] - 7:17, 8:19,</p>			

<p>97:20, 102:20, 106:29 touched [2] - 15:14, 85:10 touches [1] - 13:17 touching [2] - 59:28, 61:20 towards [9] - 14:17, 27:3, 28:6, 30:13, 41:27, 64:29, 67:7, 67:16, 76:7 tragically [1] - 83:16 tranches [2] - 20:14, 26:21 transcript [2] - 1:20, 44:5 transfer [1] - 20:21 transferred [1] - 37:26 translate [1] - 90:9 translates [1] - 87:15 translation [1] - 69:23 translator [1] - 69:25 transparency [1] - 19:8 transparent [1] - 37:24 transported [1] - 77:14 trap [1] - 66:28 travel [1] - 66:3 travelling [2] - 66:2, 66:4 trial [1] - 78:18 tribunals [1] - 47:16 trivial [4] - 59:2, 101:10, 102:3, 106:19 true [1] - 32:29 trumped [1] - 50:8 trust [1] - 47:17 truth [1] - 87:5 try [2] - 3:28, 44:14 trying [1] - 89:28 turn [21] - 6:28, 10:11, 13:9, 13:29, 39:14, 47:24, 58:10, 63:26, 66:16, 66:20, 67:13, 69:7, 72:1, 73:18, 75:5, 76:5, 83:8, 84:11, 85:9, 96:18, 103:28 turned [1] - 47:21 turning [3] - 33:15, 59:23, 60:6 turns [1] - 60:5 two [51] - 1:10, 2:6, 8:28, 10:3, 11:19, 14:14, 15:5, 15:21, 22:21, 22:23, 22:27, 23:22, 26:6, 28:4, 37:5, 43:18, 43:26,</p>	<p>45:1, 48:29, 50:6, 53:24, 54:24, 55:2, 57:2, 57:5, 57:9, 60:20, 62:21, 63:10, 64:11, 64:17, 64:19, 67:6, 69:1, 74:10, 77:14, 78:5, 78:6, 79:17, 80:24, 81:21, 82:13, 82:14, 82:20, 97:8, 97:14, 102:15, 105:13, 109:10, 110:24 Two [1] - 82:3 type [8] - 47:4, 54:2, 61:10, 70:29, 74:13, 74:26, 89:25, 102:7 types [3] - 77:9, 96:8, 98:5 Tyrone [1] - 66:29</p>	<p>understandably [2] - 3:17, 7:3 understood [5] - 32:26, 32:27, 38:9, 42:1, 44:1 undertake [3] - 21:16, 26:28, 36:5 undertaken [2] - 27:11, 92:3 undertaking [3] - 25:16, 111:27, 112:12 undoubtedly [3] - 17:18, 46:20 unfair [4] - 43:21, 44:20, 44:23, 46:20 unfettered [1] - 40:23 unfortunate [3] - 33:12, 46:23, 47:21 unfortunately [2] - 43:24, 63:21 United [6] - 50:18, 50:19, 77:6, 77:11, 77:21, 116:11 unknown [2] - 4:10, 101:2 unless [5] - 95:22, 99:21, 115:6, 118:23, 119:23 unlikely [2] - 50:8, 55:28 unnecessary [2] - 36:7, 114:12 unpredictable [1] - 101:22 unsatisfactory [3] - 41:7, 41:23, 42:14 unsurprising [1] - 102:27 unusual [2] - 25:23, 76:24 up [13] - 5:29, 44:5, 44:14, 60:5, 60:6, 63:26, 71:8, 75:5, 84:12, 86:19, 88:5, 95:28, 106:16 update [17] - 2:7, 4:5, 4:7, 4:11, 4:17, 8:14, 9:3, 13:9, 15:13, 15:21, 25:2, 29:23, 33:13, 38:24, 38:27, 42:8, 42:21 updating [1] - 6:11 uplift [1] - 31:6 upshot [1] - 44:16 urgent [1] - 5:3 useful [5] - 51:9, 78:8, 78:14, 82:16, 89:28 utilise [1] - 85:3</p>	<p style="text-align: center;">V</p> <p>vacate [2] - 16:5, 32:21 vacated [1] - 6:26 value [7] - 48:27, 49:22, 103:17, 110:5, 110:6, 110:9, 110:14 variety [1] - 90:11 vast [1] - 26:28 vehicle [9] - 68:6, 71:16, 71:25, 72:23, 74:18, 77:15, 78:6, 78:12, 90:7 vehicles [2] - 76:11, 76:17 ventilated [1] - 39:11 ventilation [1] - 14:13 versa [1] - 18:15 version [4] - 13:23, 86:27, 87:7, 100:4 versions [1] - 26:6 versus [3] - 83:1, 108:4, 110:8 via [1] - 20:2 viable [1] - 72:12 vice [1] - 18:14 view [15] - 6:20, 11:25, 11:27, 17:21, 19:29, 27:24, 30:9, 30:17, 31:12, 37:3, 48:9, 52:29, 81:24, 86:8, 90:17 viewed [1] - 40:13 viewing [3] - 1:16, 1:29, 13:4 views [4] - 24:24, 43:24, 49:18, 49:19 vigilant [1] - 73:3 violence [3] - 116:13, 116:17, 116:18 vital [2] - 25:14, 66:24 vitality [1] - 30:19 voice [1] - 88:16 volume [6] - 8:10, 8:15, 11:6, 20:12, 39:25, 69:27</p> <p style="text-align: center;">W</p> <p>Ware [1] - 28:3 warned [1] - 75:15 warning [1] - 13:19 warns [1] - 75:9 WAS [2] - 120:5, 121:10 WAVE [1] - 2:2</p>	<p>ways [1] - 19:8 web [1] - 45:4 website [5] - 13:25, 15:26, 35:10, 45:29, 48:26 websites [1] - 45:28 Wednesday [1] - 79:18 week [8] - 6:18, 9:14, 16:21, 24:3, 37:7, 41:12 weeks [4] - 7:10, 8:28, 9:17, 37:5 Weir [1] - 104:8 welcome [1] - 19:9 welcomes [1] - 113:21 well-founded [2] - 108:18, 108:21 well-known [2] - 47:15, 51:6 wheelchair [1] - 65:22 whereby [1] - 21:16 Whilst [1] - 97:7 whilst [7] - 56:20, 57:20, 60:5, 71:27, 88:7, 107:4, 111:25 White [1] - 28:9 whole [3] - 12:13, 12:23, 36:3 wholly [1] - 36:6 widely [1] - 36:20 wider [6] - 4:10, 8:12, 19:27, 27:25, 34:10, 39:2 widespread [1] - 44:1 wife [1] - 66:3 wildlife [3] - 81:21, 81:23, 82:20 willingness [1] - 28:17 winning [1] - 28:3 wish [10] - 2:1, 2:3, 13:3, 34:18, 39:17, 62:4, 62:7, 95:6, 115:7, 118:4 wishes [2] - 24:18, 55:22 withheld [1] - 35:14 withholding [2] - 34:6, 48:3 witness [27] - 4:21, 24:9, 25:3, 27:27, 37:18, 38:3, 48:4, 48:7, 48:12, 48:18, 53:19, 53:20, 55:6, 55:9, 87:29, 88:26, 93:14, 94:23, 113:15, 113:16, 114:4,</p>
--	--	--	---	--

114:20, 114:21,
114:23, 119:8,
119:10, 119:11
witness's ^[1] - 101:8
witness-specific ^[1]
- 114:23
witnesses ^[13] -
2:15, 23:10, 29:22,
43:3, 48:1, 48:11,
66:23, 85:3, 89:12,
90:19, 91:5, 113:18,
114:25
wonder ^[3] - 56:19,
78:17, 85:12
Woof ^[2] - 108:11,
110:6
word ^[2] - 28:2,
100:11
words ^[7] - 4:29,
22:5, 34:17, 51:5,
51:9, 101:26, 108:10
works ^[1] - 26:24
world ^[3] - 73:14,
90:1, 108:26
writing ^[3] - 20:15,
49:20, 51:3
written ^[25] - 2:18,
53:15, 57:19, 84:14,
86:7, 88:5, 95:25,
96:5, 96:10, 96:19,
96:25, 98:13, 98:18,
100:7, 101:16,
101:19, 102:22,
102:23, 103:17,
103:24, 103:29,
105:12, 110:3,
113:11, 113:24

Y

year ^[20] - 6:14, 6:24,
7:5, 8:4, 8:18, 23:16,
35:5, 35:17, 37:6,
38:13, 40:9, 42:12,
48:22, 48:23, 65:10,
68:8, 75:28, 76:16,
84:2, 84:3
year-old ^[1] - 76:16
years ^[7] - 36:6,
51:14, 65:3, 65:19,
80:24, 103:10, 116:10
young ^[4] - 65:8,
66:12, 80:1, 83:22
YouTube ^[5] - 1:14,
1:19, 5:27, 43:27,
44:20