

TRIBUNAL OF INQUIRY INTO PROTECTED DISCLOSURES MADE UNDER  
THE PROTECTED DISCLOSURES ACT 2014 AND CERTAIN OTHER  
MATTERS FOLLOWING RESOLUTIONS PASSED BY DÁIL ÉIREANN AND  
SEANAD ÉIREANN ON 16 FEBRUARY 2017

ESTABLISHED BY INSTRUMENT MADE BY THE MINISTER FOR JUSTICE  
AND EQUALITY UNDER THE TRIBUNALS OF INQUIRY (EVIDENCE) ACT  
1921, ON 17 FEBRUARY 2017

SOLE MEMBER: MR. JUSTICE PETER CHARLETON, JUDGE OF THE  
SUPREME COURT

HELD IN DUBLIN CASTLE  
ON TUESDAY, 10TH OCTOBER 2017 - DAY 35

35

Gwen Malone Stenography  
Services certify the  
following to be a  
verbatim transcript of  
their stenographic notes  
in the above-named  
action.

---

GWEN MALONE STENOGRAPHY  
SERVICES

APPEARANCES

SOLE MEMBER: MR. JUSTICE PETER CHARLETON,  
JUDGE OF THE SUPREME COURT

REGISTRAR: MR. PETER KAVANAGH

FOR THE TRIBUNAL: MR. DIARMAID MCGUINNESS SC  
MR. PATRICK MARRINAN SC  
MS. KATHLEEN LEADER BL  
MS. ELIZABETH MULLAN, SOLICITOR

FOR THE COMMISSIONER: MR. MÍCHEÁL P. O'HIGGINS SC  
MR. CONOR DIGNAM SC  
MR. SHANE MURPHY SC  
MR. DONAL MCGUINNESS BL  
MR. NOEL WHELAN BL  
MR. JOHN FITZGERALD BL

INSTRUCTED BY: MS. KATHY DONALD  
CHIEF STATE SOLICITOR'S OFFICE  
OSMOND HOUSE  
LITTLE SHIP STREET  
DUBLIN 8

FOR TUSLA: MR. PAUL ANTHONY McDERMOTT SC  
MS. SARAH MCKECHNIE BL

INSTRUCTED BY: ARTHUR COX  
TEN EARLSFORT TERRACE  
DUBLIN 2

FOR GARDA HARRISON: MR. MARK HARTY SC  
MR. PETER PAUL DALY BL  
MR. ANTHONY QUINN BL

INSTRUCTED BY: KILFEATHER & COMPANY SOLICITORS  
THE HALLS QUAY STREET  
GALWAY

FOR SUPT. ENGLISH: MR. PADRAIG DWYER SC  
MR. BRIAN GAGEBY BL

INSTRUCTED BY: MR. CARTHAGE CONLON  
M.E. HANAHOE SOLICITORS  
SUNLIGHT CHAMBERS  
21 PARLIAMENT STREET  
DUBLIN 2

FOR INSP. SHERIDAN,  
INSP. DURKIN  
& SGT. MCGOWAN:  
INSTRUCTED BY: MR. DESMOND DOCKERY SC  
MR. MICHAEL HEGARTY  
REDDY CHARLTON SOLICITORS  
12 FITZWILLIAM PLACE  
DUBLIN 2

FOR MARISA SIMMS:

INSTRUCTED BY:

MR. HUGH HARTNETT SC  
MR. JOSEPH BARNES BL  
MR. MARK MULLANEY  
MULLANEYS SOLICITORS  
1-2 TEELING STREET  
SLIGO  
IRELAND

FOR C/SUPT. MCGINN:

INSTRUCTED BY:

MR. CONOR POWER SC  
MR. CATHAL Ó BRAONÁIN BL  
DANIEL SPRING & COMPANY  
50 FITZWILLIAM SQUARE  
DUBLIN 2

FOR MS. RITA MCDERMOTT: MR. NIALL O'NEILL BL

INDEX

WITNESS	PAGE
GARDA KARL CAMPBELL .....	6. . . .
CROSS-EXAMINED BY MR. HARTY .....	6 . . .
CROSS-EXAMINED BY MR. O'HIGGINS .....	30. . .
QUESTIONED BY THE CHAIRMAN .....	31. . .
SUPERINTENDENT MICHAEL FINAN .....	32. . .
DIRECTLY EXAMINED BY MS. LEADER .....	32. . .
CROSS-EXAMINED BY MR. HARTY .....	40. . .
RE-EXAMINED BY MS. LEADER .....	51. . .
MR. JOHAN GROENEWALD .....	51. . .
DIRECTLY EXAMINED BY MR. MCGUINNESS .....	51 . .
CROSS-EXAMINED BY MR. DALY .....	56. . .
QUESTIONED BY THE CHAIRMAN .....	62. . .
CROSS-EXAMINED BY MR. DIGNAM .....	63 . .
MR. DARREN WRIGHT .....	65 . . .
EXAMINED BY MR. MCGUINNESS .....	65. . .
CROSS-EXAMINED BY MR. HARTY .....	81 . .
CROSS-EXAMINED BY MR. DIGNAM .....	100. .
RE-EXAMINED BY MR. MCGUINNESS .....	107. .
QUESTIONED BY THE CHAIRMAN .....	110. . .
SERGEANT PAUL WALLACE .....	116. . .
DIRECTLY EXAMINED BY MR. MARRINAN .....	116. .
CROSS-EXAMINED BY MR. HARTY .....	133. . .
CROSS-EXAMINED BY MR. DOCKERY .....	148 . .
QUESTIONED BY THE CHAIRMAN .....	159. . .
CROSS-EXAMINED BY MR. BARNES .....	163. . .

DETECTIVE INSPECTOR PATRICK O'DONNELL . . . . .	164
DIRECTLY EXAMINED BY MS. LEADER . . . . .	164 .
CROSS-EXAMINED BY MR. HARTY . . . . .	170 .
RE-EXAMINED BY MS. LEADER . . . . .	175 .
SUPERINTENDENT MARY MURRAY . . . . .	176 .
SUPERINTENDENT MURRAY . . . . .	193 . .
CROSS-EXAMINED BY MR. HARTY . . . . .	193 .
CROSS-EXAMINED BY MR. DIGNAM . . . . .	211 .
QUESTIONED BY THE CHAIRMAN . . . . .	214 .

1 THE HEARING RESUMED, AS FOLLOWS, ON TUESDAY, 10TH  
2 OCTOBER 2017:

3  
4 MS. LEADER: Garda Campbell, please. Mr. Harty was  
5 just about to cross-examine Garda Campbell. 10:00

6  
7 GARDA KARL CAMPBELL WAS CROSS-EXAMINED BY MR. HARTY:

8 1 Q. MR. HARTY: Morning, Garda Campbell.

9 A. Morning.

10 2 Q. Just can you outline for me again your functions within 10:00  
11 the district office or the divisional office in Donegal  
12 Town?

13 A. Yeah.

14 3 Q. Letterkenny I should say, sorry.

15 A. I manage internal disciplinary files, files relating to 10:01  
16 GSOC complaints, files relating to legal actions and  
17 civil actions and confidential files, which also  
18 includes threat files, you know, threats to people and  
19 so on and so forth.

20 4 Q. So in relation to Garda Harrison, just in relation to 10:01  
21 confidential files, would that have included the  
22 threats? would that have come within the --

23 A. Yes.

24 5 Q. The threats to Garda Harrison would have been included  
25 within those files? 10:01

26 A. Yes.

27 6 Q. When you ordinarily attend, do you ordinarily attend  
28 weekly conferences with the chief superintendent?

29 A. No.

1 7 Q. No?  
2 A. No.  
3 8 Q. Can you tell me who attends weekly conferences with the  
4 chief as notetaker?  
5 A. Usually Sergeant Duffy, he is the divisional clerk. 10:01  
6 9 Q. He is the divisional clerk?  
7 A. Yes.  
8 10 Q. And he would be the person who would ordinarily take  
9 notes of meetings that take place?  
10 A. Yes, yes. Now, if he wasn't available one of the other 10:02  
11 members is usually -- I have never actually taken  
12 notes.  
13 11 Q. Right. Because it would be -- in terms of formal  
14 conferences, it would be the practice that there is  
15 ordinarily a notetaker there, isn't that correct? 10:02  
16 A. Generally, yes.  
17 12 Q. Yes. Can you tell me what you knew about Garda  
18 Harrison before the 8th October?  
19 A. As far as I can recall, the only file that I would have  
20 dealt with would have been the no insurance case back 10:02  
21 in 2012 and then there was a subsequent disciplinary  
22 file relating to it.  
23 13 Q. Right.  
24 A. I was aware of Chief Superintendent Sheridan and I  
25 retired [as heard] his meeting with Garda Harrison I 10:02  
26 think the previous year in 2011, but there was no  
27 actual paperwork on it.  
28 14 Q. You had no paperwork. But you're aware of the import  
29 of that and what that was all about, the Buncrana

1 incident?

2 A. Yes, yes.

3 15 Q. Yes. In relation to the section 102 referral that was  
4 made in May of 2013, that would have come across your  
5 desk as well I take it? 10:03

6 A. Yes, in relation to 102 referrals all we get is  
7 basically notification from GSOC that their  
8 investigation is ongoing and you may get an update  
9 report from them but we have no actual input into any  
10 of the action as GSOC carry out their investigation. 10:03  
11 And they may send you a request looking for information  
12 in relation to it, which you would forward on to the  
13 district office, the relevant district office, and then  
14 you might get a correspondence at the end saying that  
15 they have concluded and whatever their findings were. 10:03  
16 But we would not have any actual sort of formal  
17 dealings with the actual investigation file.

18 16 Q. Yes. But in relation to, I think the section 102  
19 referral in that instance was made by Chief  
20 Superintendent Sheridan -- 10:04

21 A. No, it would have been made by the superintendent in  
22 Letterkenny district, I am not too sure -- I think it  
23 was Vincent O'Brien at the time, I am not 100 percent  
24 sure.

25 17 Q. Right. I think the period we come to in October there 10:04  
26 was no superintendent in the station at that stage?

27 A. Possibly. Yeah, possibly.

28 18 Q. But that section 102 referral didn't across your desk  
29 before it was sent to GSOC?



1 A. No, no, no. We would have got a copy of the referral  
2 once it had been made, just for filing purposes.

3 19 Q. Filing purposes. Now, your recollection, and I think  
4 it coincides with Chief Superintendent McGinn's  
5 recollection, that you weren't present at the start of 10:04  
6 the meeting on 8th of October?

7 A. That's correct.

8 20 Q. And you were asked by the chief superintendent to join  
9 the meeting, and at that point the statement of -- that  
10 had been taken by Inspector Sheridan from Marisa Simms 10:05  
11 was read out to the meeting?

12 A. That's correct.

13 21 Q. In relation to that, you noted the various relevant  
14 points, key points in respect of that, isn't that  
15 correct? 10:05

16 A. That's correct.

17 22 Q. And you took notes in relation to that element?

18 A. No. I didn't take any notes, no.

19 23 Q. Chief Superintendent McGinn said that you did take  
20 notes of the incidents. 10:05

21 A. We all had a copy of the statement and I remember I had  
22 a highlighter marker and I was just highlighting  
23 sections, but I didn't actually make any notes.

24 24 Q. I understand. Okay. What else then was discussed at  
25 that meeting while you were there? 10:06

26 A. Well, they went through the statement, which I can't  
27 remember the exact -- how long it took, but it probably  
28 took quite a while because it was fairly detailed.

29 25 Q. Yes?

1 A. And sort of any of the criminal allegations or  
2 disciplinary matters that would fall within  
3 disciplinary proceedings would -- were highlighted.  
4 And the discussion then went on to the referral to GSOC  
5 and the method that would be done, whether 102 or 10:06  
6 section 85.

7 26 Q. Okay. Now, can I take it that you did have input into  
8 the section 102, section 85 discussion?

9 A. I was asked for my, you know -- well, it was a general  
10 discussion and I was asked for my opinion because I had 10:06  
11 dealt with matters similar before.

12 27 Q. Right. And when you say general discussion, I take it  
13 there were four other people or five other people in  
14 the room, I take it all people were partaking in the  
15 discussion? 10:07

16 A. I don't recall who spoke or --

17 28 Q. Right.

18 A. Mainly it was Superintendent McGovern and the chief. I  
19 don't know if Inspector Sheridan or if Detective  
20 Inspector O'Donnell would have had much input. They 10:07  
21 wouldn't ordinarily deal with referrals because they  
22 are done by the district officer, so I don't recall to  
23 be honest with you. But I think it was just myself and  
24 the chief superintendent and Superintendent Finan -- or  
25 Superintendent McGovern, sorry. 10:07

26 29 Q. And did Superintendent Finan have anything to add on  
27 it?

28 A. I don't recall, to be honest with you.

29 30 Q. The nature of that discussion in respect of section

1 102, perhaps if we come to the conclusion of it first.  
2 How many section 102 referrals have been made from the  
3 Donegal division that have been rejected out of hand?  
4 A. I don't know. I can't answer that figure -- I can't  
5 answer that question. I don't actually know. 10:08  
6 31 Q. Right.  
7 A. Because the referrals are made by the districts, we are  
8 copied on files.  
9 32 Q. I understand.  
10 A. The district would be informed of whether an 10:08  
11 investigation was going to be taken on or whether the  
12 file was going to be closed on it and we would get a  
13 copy of it and it's basically filed in a folder with  
14 102 referrals. I don't have a record. I can't answer  
15 the figure -- or give you a figure, sorry. 10:08  
16 33 Q. Certainly Superintendent McGovern said he had never had  
17 one rejected --  
18 A. Right.  
19 34 Q. -- in this manner. And in relation to section 102, you  
20 are aware of the provisions of section 102? 10:08  
21 A. Yes.  
22 35 Q. And you are aware that section 102 applies where there  
23 -- where a guard -- where the Commissioner believes  
24 that a guard may have caused serious harm?  
25 A. Yes. 10:09  
26 36 Q. And you are aware that serious harm is defined in the  
27 Act?  
28 A. Yes.  
29 37 Q. What was your view that you expressed at the meeting in

1 relation to section 102?

2 A. Well, the merits of both were discussed and it was  
3 decided that given the nature of the allegations and  
4 the threats that were contained in the statement, that  
5 due to the seriousness of it that section 102 was the 10:09  
6 most appropriate avenue to make the referral through.  
7 That section 85 was more suited to more -- not trivial  
8 but more minor complaints and matters.

9 38 Q. And is that your understanding of the distinction  
10 between section 85 and section 102? 10:09

11 A. Well, I deal with section 85 referrals, they come  
12 through our office and they referred on by the chief  
13 superintendent.

14 39 Q. Yes.

15 A. And they are usually, I am not saying trivial but in 10:10  
16 some cases they are trivial.

17 40 Q. Yes.

18 A. They are minor complaints maybe about a guard's  
19 attitude or his being discourteous, or along them  
20 lines, or failing to contact somebody or -- you know, 10:10  
21 they are less serious in nature.

22 41 Q. And they can also be more serious.

23 A. Oh yes.

24 42 Q. I presume there would be section 83 complaints made and  
25 I am not suggesting in any way that they were upheld, 10:10  
26 but I presume there would be section 83 complaints made  
27 by people saying that they had received a clatter in a  
28 Garda station, that you have dealt with?

29 A. Well, a section 85 referral -- there's three methods

1 basically of referring a file or a complaint to GSOC.  
2 One is where the person comes into the station to say  
3 they wish to make a complaint in relation to whatever  
4 it is, and a prescribed form is filled out with all the  
5 details and that is sent off to GSOC. The second one 10:10  
6 is the one, section 85 where I would deal with, is if  
7 somebody wrote in a letter complaining about maybe the  
8 traffic management at an event and they are giving out  
9 that the guard, you know, told them to go away and mind  
10 their own business. And while they mightn't be 10:11  
11 complaining about the actual guard they are complaining  
12 about the management of this event, because there is a  
13 complaint contained in it that then is sent to GSOC.  
14 We are obliged to send it in accordance with 85 because  
15 it contains a complaint. 10:11  
16 43 Q. You are not in fact. And I can get the -- the Garda  
17 Act provides that, you see, section 85 is the mechanism  
18 by which a complaint is forwarded?  
19 A. Correct, yes.  
20 44 Q. And it's where somebody goes to make a complaint under 10:11  
21 section 83 to a Garda station that section 85 is then  
22 applied as to what the Garda station must do?  
23 A. Okay.  
24 45 Q. And so in section 85, the section says that:  
25 10:11  
26 "Where the Commissioner or a member of An Garda  
27 Síochána receives a complaint under Section 83(2) --"  
28  
29 So, in other words, where a complaint is made in a

1           Garda station.

2  
3           "-- he shall immediately record the complaint, the date  
4           and time of its receipt, provide the complainant with a  
5           written acknowledgement of its receipt and forward to     10:12  
6           the Ombudsman Commission a copy of the complaint or if  
7           the complaint was not made in writing a copy of the  
8           record of the complaint.

9  
10          If the complaint is made to a member of the Garda  
11          Síochána at a Garda Síochána station, the member in  
12          charge of the station at the time the complaint is  
13          received shall ensure that the Garda Commissioner is  
14          notified of the complaint, and is sent a copy of the  
15          complaint --"

16  
17          And it goes on then to deal with complaints being made  
18          to chief superintendent.

19  
20          So, section 85 doesn't generate a new mechanism for a     10:12  
21          complaint, it is just simply the way of processing a  
22          complaint made under section 83(2). And section 83(2)  
23          allows for a complaint -- it deals with the situation  
24          whereby complaints to GSOC can be made directly to GSOC  
25          or to a Garda station.     10:13

26          A.    That's correct.

27    46    Q.    And I appreciate that many of the complaints that you  
28           receive under section 83(2), which you are then obliged  
29           to forward under section 85, are minor.

1 A. Yes.

2 47 Q. I can also appreciate that there might be a situation  
3 whereby in an abundance of caution even where somebody  
4 hasn't fortunately said they are making a complaint  
5 under section 83, that it might be forwarded on to GSOC 10:13  
6 and GSOC then weed out.

7 A. That's correct. They are the ones that I would deal  
8 with.

9 48 Q. Yes.

10 A. Because the other ones under section 83 are recorded at 10:13  
11 a station, we will get a copy of it and we basically  
12 forward it to Internal Affairs the copy. the district  
13 officer forwards on the actual complaint itself to  
14 GSOC. So the only ones I would deal with would be  
15 ones, possibly letters, or even phone calls, where you 10:14  
16 would make a note of it or an email, whatever the case;  
17 they are the ones that I would deal with under 85. I  
18 wouldn't -- you know, the ones made at the station are  
19 sort of pre-dealt with before they arrive to us.

20 49 Q. I understand. In other words, you have no paperwork to 10:14  
21 do in relation to the ones --

22 A. No.

23 50 Q. -- because the paperwork is already together.

24 A. Just keep a copy of it, yes.

25 51 Q. In this discussion then, did you support or what did 10:14  
26 you say about the section 102 referral? I am  
27 not asking about the general discussion, I want to know  
28 what opinion you expressed.

29 A. Well, when we were reading through the statement and

1 sort of highlighting the allegations that were  
2 contained in it, I generally agreed that 102 was the  
3 best avenue, that it was too serious a matter to be  
4 sent in accordance with section 85. And I agreed with  
5 Superintendent McGovern that 102 was the best avenue 10:15  
6 and that he would make the referral.

7 52 Q. Did Chief Superintendent McGinn agree with that?  
8 A. Yes.

9 53 Q. Yes. And in relation to the seriousness of the  
10 allegations and the threats, can I ask you, do you 10:15  
11 still hold that view in circumstances where nobody in  
12 the Donegal division investigated those threats  
13 afterwards?  
14 A. Sorry?

15 54 Q. In relation to the threats made against -- allegedly 10:15  
16 made by Garda Keith Harrison --  
17 A. Yes.

18 55 Q. -- nobody in the Donegal division investigated those  
19 threats afterwards.  
20 A. Okay. 10:15

21 56 Q. So do you still hold the view that those threats were  
22 very serious?  
23 A. At the time, I believed they were, yes. At the time of  
24 the meeting, whenever it was being discussed I believe  
25 that they were, yes. 10:15

26 57 Q. But you appreciate that the person who took the  
27 statement, Inspector Sheridan, took no steps to  
28 investigate those threats afterwards?  
29 A. I had no part in the investigation part of it. I



1 managed the office file and I can't -- I don't have an  
2 answer to that.

3 58 Q. Well, you do to a certain extent do more than just  
4 that, because you were asked by, and you were involved  
5 in correspondence afterwards from -- you forwarded the 10:16  
6 disciplinary and were involved in the drafting of the  
7 suspension letter, isn't that correct?

8 A. Yes, that's correct.

9 59 Q. You were involved in corresponding with Inspector  
10 Sheridan to find out for an update in respect of the 10:16  
11 inquiries that had been made in the hotel in westport,  
12 isn't that correct?

13 A. That's correct.

14 60 Q. And that was dealt with in an email on the -- at page  
15 931, if that could be brought up, please, page 931, by 10:17  
16 Mr. Kavanagh. Here it is. And you sent an email on  
17 the 7th November:

18

19 "Goretti has there been any further on the westport  
20 thing? GSOC have reverted and said that Marisa Simms 10:18  
21 has contacted them in reply saying that she would not  
22 be cooperating with their inquiry. So therefore they  
23 are closing their file on the matter. A request will  
24 be forwarded from this office to assistant commissioner  
25 Sligo to appoint a superintendent from outside the 10:18  
26 division to investigate all aspects of this matter, so  
27 we need to gather up as much as we can in anticipation  
28 of such an appointment."

29 A. Yes.

1 61 Q. So you were aware that you hadn't received any further  
2 information from Inspector Sheridan after the 8th  
3 October, isn't that correct?  
4 A. That's correct, yes.

5 62 Q. And not only that, you are aware that there were things 10:19  
6 that were supposed to have been investigated?  
7 A. Yes, I was aware that she was to make inquiries with  
8 Westport.

9 63 Q. She says in her reply to you:  
10  
11 "I have the statements from Westport confirming that he  
12 contact the hotel, etcetera, not posing as a guard but  
13 as a groom."  
14  
15 Now I have cross-examined her in relation to her 10:19  
16 looseness in relation to that.  
17  
18 "In Templemore. Spoke to her last week. She indicated  
19 she might withdraw statement but I advised her to take  
20 time about it." 10:19  
21  
22 Now, why is she telling you that Marisa Simms might  
23 withdraw the statement?  
24 A. Well, possibly because -- well, I don't know why she is  
25 telling me. I was looking for an update in relation to 10:19  
26 the incident in Westport. But I am guessing that she  
27 told me possibly because if the statement was withdrawn  
28 then, if Marisa Simms withdrew her statement, then sort  
29 of like all matters within that statement, which

1 included the westport thing, would be sort of null and  
2 void or would be lessened, I suppose.

3 64 Q. "In class, will ring in a wee while." So I take it she  
4 did ring?

5 A. I don't recall, to be honest with you. I don't recall 10:20  
6 any phone call on this.

7 65 Q. Do you keep an electronic copy of records of calls that  
8 are made to you or a hard copy or --

9 A. I don't -- telephone calls?

10 66 Q. Yeah. 10:20  
11 A. I wouldn't keep a copy unless there was something of  
12 importance in the phone call.

13 67 Q. Do you maintain, just in terms of general practice, do  
14 you maintain a record at your desk, a written record at  
15 your desk of calls that are made to you or a register 10:20  
16 of calls?

17 A. No, there is no such -- there is no register of calls.  
18 If I received a call, like not in relation to this, but  
19 if I received a call where somebody was maybe abusive  
20 or was maybe making allegations, then I would record a 10:21  
21 note of it. But not general calls from maybe  
22 inspectors or supers, no.

23 68 Q. Okay. You see, one thing Goretta Sheridan isn't  
24 dealing with in the email with you is that she is not  
25 saying 'I think she is still in danger, I think there 10:21  
26 is still a risk, I think Keith Harrison is going to  
27 threaten her again', none of that is contained in that.  
28 She doesn't appear to have any interest in the ongoing  
29 safety of Marisa Simms.

1 A. Okay.

2 69 Q. And I accept that you weren't involved in the  
3 investigation, but you do appreciate that the concern  
4 here appears to be about getting a disciplinary file  
5 together against Keith Harrison, rather than the safety 10:22  
6 and well-being of Marisa Simms and her children. Now,  
7 I accept that that might have been what you were tasked  
8 with and nothing else but unfortunately nobody else  
9 seems to be expressing any concern about it either.

10 A. Okay. 10:22

11 70 Q. And what I have to say to you, while things were being  
12 presented to you at a meeting by Inspector Sheridan,  
13 Chief Superintendent McGinn and Superintendent McGovern  
14 to a certain extent I presume, that what was in the  
15 statement was very serious and urgent and a desperate 10:22  
16 situation, in fact nothing was done in relation to it.

17 A. Okay.

18 71 Q. Would that affect your view of what you were told at  
19 that meeting?

20 A. Well, possibly in hindsight. But like, at the time I 10:23  
21 was -- you know, I was of the opinion that it was a  
22 serious matter and that it needed to be referred on.

23 72 Q. And in the same way that Superintendent McGovern was of  
24 the opinion that it was a serious matter and needed to  
25 be dealt with, but the people who were actually called 10:23  
26 to this investigation and led this investigation did  
27 nothing, and they were the people who had their  
28 information, you had your information, there are five  
29 people in the room -- or sorry at this stage now there

1 are six people in the room when you joined the meeting.

2 A. Okay.

3 73 Q. But Inspector Sheridan, Chief Superintendent McGinn,  
4 they are showing a remarkable, shall we say, calm about  
5 the ongoing situation for Marisa Simms and her 10:23  
6 children --

7 A. Okay.

8 74 Q. -- after this meeting. And would you accept that in  
9 retrospect and in hindsight, that insofar as you were  
10 at a meeting and led to believe that it was about 10:24  
11 ongoing concern for the safety of these people, that  
12 clearly that concern seems to have evaporated, shall we  
13 say, within two days?

14 A. No. I wouldn't accept that because like, like I say, I  
15 only dealt with the office file and as far as I was 10:24  
16 concerned the investigation was ongoing, our inquiries  
17 were ongoing and, you know, it's not my part to inquire  
18 into what -- you know, how fast anything is being done.  
19 And, as far as I was concerned, you know, inquiries and  
20 the investigation was ongoing and was taking a certain 10:24  
21 direction.

22 75 Q. Mm-hmm. But you are sending correspondence out in  
23 relation to this on behalf of the chief superintendent,  
24 aren't you?

25 A. Yes. 10:25

26 76 Q. And is she not asking you to correspond with the people  
27 who should be carrying out the inquiries, the  
28 investigation? She is not asking you to find out what  
29 the current situation is in relation to Keith Harrison

1 and Marisa Simms?

2 A. No, no. No. It's just in relation to the  
3 investigation.

4 77 Q. Before we leave the meeting of the 8th October, what  
5 discussion was had in relation to the referral to 10:25  
6 Tusla?

7 A. I don't recall. It may have happened when I was there  
8 but because I would have had, you know, no dealings  
9 with any referrals in relation to Tusla or the HSE I  
10 don't actually recall. So it may have actually 10:26  
11 happened, it may have been one of the first things that  
12 were discussed before I came in, I didn't -- it  
13 certainly doesn't stand out in my mind.

14 78 Q. Okay. You have no recollection in relation to it, you  
15 were present of -- you were present certainly for the 10:26  
16 reading of the statement and the GSOC conversation?

17 A. Yeah, yeah.

18 79 Q. And in relation to the GSOC conversation, do you recall  
19 mention being made of section 105 of the Act?

20 A. No. 10:26

21 80 Q. No. Do you remember what section 105 --

22 A. If you remind me what it is.

23 81 Q. It's the section which basically says that the guards  
24 can still continue with their investigations even if a  
25 matter has been forwarded to GSOC. 10:26

26 A. Okay. I don't recall that, no, I don't recall that  
27 specific --

28 82 Q. Do you recall mention of certain witnesses having to be  
29 interviewed? And I am not asking for specifics, do you

1 recall mention of that?

2 A. You know, I can't answer -- I can't say I do because it  
3 doesn't, again it doesn't -- you know, it doesn't stand  
4 out -- or it doesn't stand out in my mind that certain  
5 people were to be interviewed or spoken to, so I can't 10:27  
6 answer that. I am sorry.

7 83 Q. Okay. The day after this meeting, I take it, or was it  
8 the same day, you drafted up a report, do you recall  
9 when that was done?

10 A. Possibly the next day or started maybe that evening 10:27  
11 but -- you know, within 24 hours, probably.

12 84 Q. Okay. And am I correct in saying that you drafted that  
13 and then forwarded it to the chief for her approval?

14 A. I would have put the bones of it together, if you want  
15 to put it that way. There is a sort of a template to 10:28  
16 be followed if you are considering a suspension so  
17 you -- I sort of populated all those areas and then for  
18 the primary and secondary considerations that would  
19 have been the chief's, she would have dictated what she  
20 wanted in relation to each of those. 10:28

21 85 Q. She would have dictated those?

22 A. Yes.

23 86 Q. Can we come to page 1624 then, please, Mr. Kavanagh?  
24 Now, can you recall in relation to the first paragraph  
25 there: 10:28  
26

27 "I refer to the matter and the attached statements,  
28 indicating that Garda Harrison was going to be shot  
29 tonight. The purpose of this report is to provide as

1 much information as possible."  
2  
3 Did you draft that bit?  
4 A. Yes, I think. Yes, I did.  
5 87 Q. And then the interested parties, if we move down the 10:28  
6 page, please, Garda Keith Harrison, Marisa Simms, those  
7 personal details?  
8 A. Yes.  
9 88 Q. And you put those in?  
10 A. Yes. 10:29  
11 89 Q. Can you tell me where you got those personal details?  
12 A. Well, I would have had Garda Harrison's name and  
13 address and date of birth from his -- there is a  
14 personnel file kept in relation to each member, it's  
15 kept in the divisional office, so those details would 10:29  
16 have been recorded in it. And in relation to -- he was  
17 briefly married and dates there, that came from  
18 Ms. Simms' statement.  
19 90 Q. Okay. And the couple divorced in November 2011?  
20 A. Yeah, that is from Ms. Simms' statement. 10:29  
21 91 Q. Okay. "Garda Harrison has 12 years service and has  
22 been attached to Donegal division since March 2011."  
23 That all came from Ms. Simms' statement?  
24 A. No, well -- his date of birth --  
25 92 Q. Oh sorry, the divisional thing, yes, no. And if we 10:29  
26 move to the next page, you refer to the report of Rita  
27 McDermott?  
28 A. Yes.  
29 93 Q. The complaint of Marisa Simms?



1 A. Yes.

2 94 Q. The section 102 referral?

3 A. Yes.

4 95 Q. And the threat against Garda Harrison?

5 A. Yes, that's correct, yes. 10:30

6 96 Q. So am I to take it that you had those reports?

7 A. I think the threat, yeah, was from Superintendent

8 English, it was a fairly detailed report.

9 97 Q. That is on the earlier page. But in relation to the

10 Rita McDermott reports, the Marisa Simms complaint, you 10:30

11 had a copy of those in front of you?

12 A. I don't know if I had -- I don't know if I had the

13 actual report or if I just had knowledge of it at that

14 stage. I obviously was aware of it. I don't know if I

15 physically had the statement at that stage. 10:30

16 98 Q. Mm-hmm. If we move to the next page, 1626. The

17 primary considerations, did you put that in?

18 A. Well, I would have put the title in, yes. That would

19 have been from the -- the template that we use.

20 99 Q. Sorry, the question on the strength of the evidence, 10:31

21 etcetera --

22 A. Yes.

23 100 Q. -- did you enter all of that?

24 A. I would have typed it, yes.

25 101 Q. Sorry, was that dictated, when you say you typed that? 10:31

26 A. Dictated, yes.

27 102 Q. Sorry. I am not -- I'm interested in the bits that you

28 created yourself, rather than took down.

29 A. Okay. That section would have been dictated by the

1 chief.

2 103 Q. Yes. Yes. And the chief dealt with all of that?

3 A. Yeah, yes, the whole next few sections in relation to  
4 primary and secondary considerations. You know, like  
5 say, there for example, number 3, risk to members of 10:32  
6 the public, that is sort of the title or the heading  
7 that you -- so I would have filled all them in and she  
8 would have dictated.

9 104 Q. Okay. The section then at page 1628: "Other matters:  
10 HSE referral has been made by Sergeant Brigid McGowan." 10:32

11 A. Yes.

12 105 Q. Did you put that in?

13 A. I would have typed it, yes.

14 106 Q. Typed it. When I say put in --

15 A. I apologise. I am not too sure if I was being given 10:32  
16 that information or if I had -- I don't believe I had a  
17 report in relation to that at the time. I don't  
18 actually recall it. So I believe maybe that the chief  
19 informed me whenever we were going through the forms --  
20 or sorry, going through the stuff to be put into the 10:32  
21 report.

22 107 Q. Okay. The question of the matter not being put on  
23 pulse?

24 A. That would have come from the chief. I wouldn't have  
25 been aware of that. 10:33

26 108 Q. Okay. And the question of the safety order?

27 A. Again, I would have been -- that would have been  
28 dictated for me.

29 109 Q. Can I take it that the conclusion was dictated by the

1 chief?

2 A. I believe it was, yes.

3 110 Q. Now, you forwarded that on to Superintendent McGovern  
4 for his approval, isn't that correct?

5 A. I was asked to send it, yeah. well, not so much of 10:33  
6 approval; if he wanted anything additional put into it  
7 or if he had any views or observations that he thought  
8 should have been included.

9 111 Q. Okay. And you then forwarded that on to Chief  
10 Superintendent McLoughlin in Internal Affairs? 10:33

11 A. Correct.

12 112 Q. And at that point Chief Superintendent McLoughlin  
13 replies to the notice asking why was the section 102  
14 referral made, isn't that correct?

15 A. That's correct, yes. 10:34

16 113 Q. And I should pull that up. And that is the -- the  
17 situation is that he was confused as to why you had  
18 made a section 102 referral at all, isn't that right?

19 A. That's correct.

20 114 Q. And that is at page 1622. Now, that was an email sent 10:34  
21 to Chief Superintendent McGinn on 8th, and it had come  
22 back in relation to -- did you see that email on the  
23 8th or were you aware of that?

24 A. No, I wasn't aware of the actual email, no. I was  
25 aware of the office correspondence that came. 10:35

26 115 Q. On the 10th, in response to yours?

27 A. Yes, yes.

28 116 Q. But were you aware on the 8th and 9th that in fact the  
29 section 102 was already being queried?

1 A. I don't think so, to be honest, no.

2 117 Q. And in fact, it's not referred to in your report that  
3 you did to Chief Superintendent McLoughlin that there  
4 was a query over the section 102 referral?

5 A. I don't believe that I was aware at that stage, no. 10:35

6 118 Q. But you were aware when you received the correspondence  
7 relating to it --

8 A. Yes.

9 119 Q. -- asking for an explanation --

10 A. Yes. 10:36

11 120 Q. -- as to why the section 102 referral -- what steps  
12 were taken in the divisional office then in relation to  
13 that query?

14 A. Well, I was asked by the chief to send it to  
15 Superintendent McGovern for basically him to explain 10:36  
16 his rationale in sending the 102 referral, sending it  
17 under 102. So it would have been a short minute to  
18 that effect.

19 121 Q. Yes. The email that you sent to Inspector Sheridan in  
20 November looking for the westport, you say: "We need 10:36  
21 to gather up as much as possible -- as much as we can."

22 A. Yes.

23 122 Q. why?

24 A. Well, I was being asked to draft up a report to send to  
25 the assistant commissioner to look for a superintendent 10:37  
26 from outside the division to investigate the incidents  
27 and what usually happens, we are anticipating that he  
28 would maybe nominate a superintendent in Cavan-Monaghan  
29 or wherever the case may be, Sligo, wherever it was,

1 and the chief would then -- what sort of happens or  
2 what has happened, usually happens is the chief  
3 superintendent would then make the appointment of that  
4 super. But you just don't send down an appointment  
5 paper saying you are appointed to investigate. You 10:37  
6 would have to provide material for him basically to  
7 investigate. So it was to -- if we were making an  
8 appointment so that at that stage we had it mentioned  
9 in Ms. Simms' statement, but we had -- I didn't have  
10 anything concrete, I didn't have the statement or a 10:37  
11 report to put along with the appointment papers to be  
12 sent to whatever superintendent was appointed, or that  
13 I thought was going to be appointed.

14 123 Q. But you knew from the meeting of the 8th that  
15 Superintendent Finan had undertaken to get some 10:38  
16 information in relation to that, do you recall that?  
17 A. Superintendent Finan?

18 124 Q. Yes.  
19 A. I don't recall that. In relation to the Westport  
20 incident? 10:38

21 125 Q. Yes.  
22 A. No, Inspector Sheridan was making the inquiries, I  
23 thought.

24 126 Q. Superintendent Finan in his statement appears to be of  
25 the view that he undertook at the meeting on the 8th to 10:38  
26 look into the Westport incident.  
27 A. Okay. That may well be the case. I don't recall that.  
28 And I was under the impression that Inspector Sheridan  
29 -- and like by her reply, I assumed that it was her and

1           that is why I sent it to her.

2 127 Q.    You were under the impression on the 8th of October  
3           that Inspector Sheridan was the investigating officer  
4           as matters stood?

5           A.    Yes, yes. 10:39

6 128 Q.    And that's why you asked her for whatever further  
7           evidence she had gathered together after that date?

8           A.    Yes.

9 129 Q.    Can you tell me why there was no notetaker at the  
10          meeting on 8th October? 10:39

11          A.    I don't know. Like I say, I was called to the meeting  
12          after it had started. I wasn't asked to come over and  
13          take notes. I was asked to come over because there  
14          were matters being discussed that I potentially would  
15          be dealing with and it was just to make me aware of 10:39  
16          files that, you know, were going to be landing on my  
17          desk and what they contained and what they were about.  
18          MR. HARTY: Okay. Thank you, Garda Campbell.

19

20          MR. BARNES: No questions. Thank you. 10:39

21

22          GARDA CAMPBELL WAS CROSS-EXAMINED BY MR. O'HIGGINS:

23 130 Q.    MR. O'HIGGINS: Garda Campbell, just two matters, if I  
24          may. During your years in the division, can you tell  
25          the Tribunal did you get any impression at any point 10:40  
26          that Garda Harrison was viewed as a major thorn in the  
27          side of Garda management?

28          A.    No, absolutely not. No.

29 131 Q.    And more specifically then, at the meeting of the 8th

1           October 2013, of which mention has been made, at that  
2           meeting did you get any sense that anybody present was  
3           intent on targeting Garda Harrison?

4           A.     No, absolutely -- no, definitely not.

5           MR. O'HIGGINS: Thank you.

10:40

6

7           MS. LEADER: Nothing arising, Chairman.

8

9           GARDA CAMPBELL WAS THEN QUESTIONED BY THE CHAIRMAN:

10   132   Q.     CHAIRMAN: Garda Campbell, most people have been asked  
11           about their career, but did you start out in Donegal  
12           and stay in Donegal?

10:40

13           A.     No. I started in Ballyconnell in County Cavan. I was  
14           there for just over a year and I transferred back to  
15           Buncrana -- to Buncrana first and I was there for  
16           almost ten years.

10:41

17   133   Q.     CHAIRMAN: And did you do a word-processing course?

18           A.     No, it was sort of self-taught.

19   134   Q.     CHAIRMAN: So you didn't even do Mavis Beacon as such?

20           A.     No. I have no formal training. It's all self-taught.

10:41

21   135   Q.     CHAIRMAN: And you became good at it over time? You  
22           would like to think so?

23           A.     Reasonably.

24           CHAIRMAN: I am sure you are right. Thank you very  
25           much.

10:41

26

27           THE WITNESS THEN WITHDREW

28

29

1 MS. LEADER: The next witness, sir, is Superintendent  
2 Michael Finan, his statement is in volume 7 at page  
3 2451.  
4

5 SUPERINTENDENT MICHAEL FINAN, HAVING BEEN SWORN, WAS  
6 DIRECTLY EXAMINED BY MS. LEADER:

10:41

7 136 Q. MS. LEADER: Superintendent Finan, I wonder would you  
8 outline to the Tribunal details of your career in An  
9 Garda Síochána to date?

10 A. I shall. I joined An Garda Síochána in September 1982.  
11 I finished training in Templemore in February 1983 and  
12 my first station was Muff in County Donegal, followed  
13 by Merville and Buncrana. In 1986 I was appointed to  
14 detective branch and transferred to Lifford in County  
15 Donegal. In 1990 I transferred from Lifford to  
16 detective branch in Letterkenny. In 1994 I was  
17 promoted to the rank of sergeant and I spent a year as  
18 sergeant in charge in Dunkineely in County Donegal. In  
19 1995 I was then appointed divisional clerk in  
20 Letterkenny and I moved back to Letterkenny where I  
21 spent six years from 1995 to 2001. In 2001 I was  
22 promoted to the rank of inspector, and I was  
23 transferred to Kevin Street in Dublin. I spent a year  
24 as an inspector in Kevin Street in Dublin, before  
25 moving back to Letterkenny, where I spent three years  
26 as a uniform inspector. I was then appointed regional  
27 traffic inspector for the northern region and I moved  
28 to the regional office in Sligo in 2005. In 2008 I was  
29 appointed detective inspector in Letterkenny, and in

10:42

10:42

10:43

10:43



1 2009 I was promoted to the rank of superintendent and I  
2 transferred to Glenties in County Donegal. On the 23rd  
3 of May 2013, I was transferred from Glenties to  
4 Ballyshannon where I took up as district officer for  
5 Ballyshannon district. On the 25th October of the same 10:44  
6 year, 2013, I was transferred to Letterkenny where I  
7 took up a position as district officer in Letterkenny,  
8 where I remain to date.

9 137 Q. So as superintendent in the Ballyshannon district you  
10 were responsible for Donegal Town Garda Station? 10:44

11 A. That is correct, I was, yes.

12 138 Q. And as part of your duties being in charge of the  
13 Donegal Town district, I think you received two reports  
14 from Sergeant Durkin, who was at that time stationed in  
15 Donegal Town? 10:44

16 A. That is correct. One in August and one in September.

17 139 Q. Okay. And those two reports, they related to reports  
18 received from Rita McDermott by Sergeant Durkin, is  
19 that correct?

20 A. That is correct, yes. 10:45

21 140 Q. Now, I don't intend opening them because we have  
22 already seen them during the course of Tribunal  
23 hearings but I think you, in your role as  
24 superintendent in Ballyshannon, forwarded those two  
25 reports to the chief superintendent in Letterkenny? 10:45

26 A. That is correct.

27 141 Q. Now, those two reports, I think the first one was  
28 forwarded by you in August 2013, and the letter  
29 forwarding it appears at page 313 of the materials,

1 that should be brought up in front of you,  
2 superintendent. So essentially, you are forwarding  
3 under confidential cover to the chief superintendent in  
4 Letterkenny a report received from Sergeant Durkin  
5 concerning the behaviour of Keith Harrison of Donegal 10:46  
6 Town Garda Station?

7 A. That's correct, yes.

8 142 Q. And I think it's fair to say that you simply summarise  
9 what is in the report and you forward it for the  
10 information and necessary attention of the chief 10:46  
11 superintendent, is that correct?

12 A. That is correct, yes.

13 143 Q. What was your purpose in forwarding or why did you  
14 forward that report to the chief superintendent?

15 A. The purpose was to first of all inform the 10:46  
16 superintendent -- or chief superintendent of the  
17 contents and also to have the information provided to  
18 the district officer at Milford where the alleged  
19 incident occurred. And also it was to -- just in  
20 relation to Letterkenny, there was a talk of an 10:46  
21 incident in Letterkenny and just to get details of that  
22 incident as well.

23 144 Q. Okay. And prior to receiving that report from Sergeant  
24 Durkin what did you know of Garda Harrison?

25 A. I hadn't met Garda Harrison. The only dealings I had 10:47  
26 with or the only paperwork I had in relation to Garda  
27 Harrison, I was originally appointed by Chief  
28 Superintendent Sheridan to investigate the disciplinary  
29 side of the matter where Garda Harrison had been

1 prosecuted in relation to no insurance and that was the  
2 first time I came across Garda Harrison and, as I say,  
3 it was on paper rather than in person.

4 145 Q. Okay. Had you met him?  
5 A. No. 10:47

6 146 Q. Okay. Now, a month later -- in or around a month later  
7 you received a second report from Sergeant Durkin, I  
8 think?  
9 A. That's correct, yes.

10 147 Q. And that report, Sergeant Durkin's report, you 10:47  
11 forwarded to the chief superintendent in Letterkenny  
12 on, I think, it seems to be, 24th September 2013?  
13 A. That's correct. That is the date, I think.

14 148 Q. And that report appears at page 314 of the materials, 10:48  
15 which should be apparent on the screen in front of you.  
16 And it's forwarded to the chief superintendent "re:  
17 Call received at Donegal Town concerning the behaviour  
18 of Garda Keith Harrison, Donegal Town Garda Station".  
19 You refer to the above matter, you attach the report  
20 from Sergeant Durkin and you refer back to the prior 10:48  
21 report?  
22 A. Correct.

23 149 Q. And you point out that Sergeant Durkin requests the  
24 district officers at Milford and Glenties are alerted  
25 to the possibilities. 10:48  
26 A. Correct.

27 150 Q. And those two possibilities I think refer to Ms. Simms  
28 moving -- removing Garda Harrison's belongings from the  
29 house?

1 A. Correct, on 2nd October, I believe, yes.

2 151 Q. On 2nd of October. And the potential for disturbance  
3 at Paula McDermott's wedding on 4th of October?

4 A. Correct, yes.

5 152 Q. Did you speak to Garda Harrison in relation to the 10:49  
6 matters?

7 A. No, I didn't have any conversation with him.

8 153 Q. And did you speak to the chief superintendent in  
9 relation to the contents of the report?

10 A. I don't believe I did, no. 10:49

11 154 Q. Okay. Now, on the 8th October you attended a  
12 conference in Letterkenny Garda Station?

13 A. That's correct, yes.

14 155 Q. Could you explain to the Tribunal how that came about  
15 and who told you about that conference and how you 10:49  
16 arrived at Letterkenny Garda Station?

17 A. I believe on the Monday the 7th I got a phone call from  
18 the divisional office in Letterkenny and I was informed  
19 that this meeting would take place the following day  
20 and that it was explained to me what the meeting would 10:50  
21 be about. And that is how I got to know about it.

22 156 Q. What was explained to you in relation to the meeting?

23 A. It was explained that a statement had been made by  
24 Marisa Simms in relation to alleged conduct by Garda  
25 Harrison and also in relation to the threats in 10:50  
26 relation to threats being made against Garda Harrison.  
27 I was aware previously of the alleged threats to Garda  
28 Harrison. I would have known about them over the  
29 weekend.

1 157 Q. who alerted you as to the threats, can you remember?  
2 A. I can't recall. That weekend I was actually off that  
3 weekend, but there was a very large funeral, a  
4 Republican funeral in the Bundoran/Ballyshannon area  
5 that weekend, so I actually worked that weekend 10:50  
6 policing that event and I believe it was at conferences  
7 or briefings, etcetera, in relation to it and that  
8 operation itself, I believe I became to know about them  
9 at that. who told me, I can't recall.

10 158 Q. And in relation to the phone call you received on the 10:51  
11 7th, can you remember who phoned you to tell you about  
12 the conference?  
13 A. I can't, no.

14 159 Q. So you travelled to Letterkenny to attend at the  
15 conference? 10:51  
16 A. Yes.

17 160 Q. who else was at that meeting, superintendent?  
18 A. The chief superintendent was there, Superintendent  
19 McGovern, Detective Inspector O'Donnell and Inspector  
20 Sheridan were all there. 10:51

21 161 Q. Can you remember what was discussed during the course  
22 of that meeting?  
23 A. I do. The meeting, we started the meeting -- the  
24 meeting started with copies of Ms. Simms' statement  
25 being distributed to each of us and then Inspector 10:51  
26 Sheridan went through the statements and as we went  
27 through it, the chief superintendent, she was making  
28 comments in relation to the different aspects of the  
29 investigation, and then it concluded, and Detective

1 Inspector O'Donnell then also briefed in relation to  
2 the threats that had been made against Garda Harrison.

3 162 Q. Do you remember conversations in relation to a referral  
4 to GSOC, superintendent?

5 A. I do. I recall that there was a conversation in 10:52  
6 relation to the referral and type of referral to be  
7 made. The exact detail I don't recall. But it was --  
8 it centred around the section 85 versus section 102.

9 163 Q. Did you contribute to that discussion?

10 A. My exact contribution, I cannot say, but I would have, 10:52  
11 if it was being discussed I would have been  
12 contributing to it, I would say. My recollection is  
13 that while it was spoken of, that the main conversation  
14 regarding it took place between Chief Superintendent  
15 McGinn and Superintendent McGovern. 10:53

16 164 Q. Did you have any view on the matter, superintendent?

17 A. At that stage, I wouldn't have had an awful lot of  
18 experience in relation to section 102 referrals, but I  
19 do recall that there were convincing arguments put  
20 forward in relation to section 102. 10:53

21 165 Q. Do you recall any conversation or discussion about the  
22 HSE referrals?

23 A. No. I don't recall any conversation in relation to  
24 that.

25 166 Q. And did you become involved subsequently in relation to 10:53  
26 the HSE referrals?

27 A. I had no involvement in that, no.

28 167 Q. Now, I think you were aware of an issue arising in  
29 relation to westport during the course of the meeting?

1 A. Yes.

2 168 Q. And if you could explain to the Tribunal your  
3 involvement in that?

4 A. Yes. I suppose it's probably when the statement was  
5 being gone through, Westport, the allegation that Garda 10:54  
6 Harrison, as a member of An Garda Síochána, had sought  
7 out CCTV footage as it was described, at a hotel in  
8 Westport. From the meeting, I undertook to have  
9 Sergeant Durkin make inquiries in relation to this  
10 alleged incident. And when the meeting concluded, I 10:54  
11 did contact Sergeant Durkin and asked him to travel to  
12 Westport and just to get to the bottom of what had  
13 happened in relation to the inquiries made.

14 169 Q. Did Sergeant Durkin report back to you in relation to  
15 the inquiries he made? 10:54

16 A. He did. I believe I was on leave the next day and he  
17 did email in relation to it and he also -- when I was  
18 talking to him, Inspector Sheridan was in charge of the  
19 investigation from a Garda point of view, and I  
20 instructed that he send anything that he got to 10:54  
21 Inspector Sheridan because of that fact that she was in  
22 charge of it. And he also emailed me a copy of what he  
23 sent to Inspector Sheridan.

24 170 Q. I think in your statement you said that you undertook  
25 to have the Westport matter looked into and any details 10:55  
26 that emerged to be forwarded to Inspector Sheridan?

27 A. Correct, yes.

28 171 Q. And that may well be why the last witness contacted  
29 Inspector Sheridan in relation to the matter?

1 A. I would believe that is what happened, yes.

2 172 Q. Did you make any notes or diary entries in relation to  
3 that meeting?

4 A. I didn't. The only note I have is of actual meeting,  
5 just to say that the meeting -- I have down "chief 10:55  
6 superintendent, meeting chief superintendent" in my  
7 diary and there's no note, I have no note taken at the  
8 meeting.

9 173 Q. Okay. So you have a diary note as to the fact of the  
10 meeting am I correct in that? 10:55

11 A. Yes, yes.

12 174 Q. But no note of what transpired?

13 A. No. Thinking back on it and what I believe probably  
14 happened was, we did get copies of the statement  
15 circulated and if I did take notes, they were probably 10:56  
16 on the statement itself. I did search to see if I  
17 could find that particular statement. I don't have it.

18 175 Q. Okay. And do you remain in Ballyshannon?

19 A. I am in Letterkenny now.

20 176 Q. You are in Letterkenny now? 10:56

21 A. Yes, yes.

22 MS. LEADER: If you'd answer any questions anybody else  
23 might have for you, superintendent.

24

25 SUPERINTENDENT MICHAEL FINAN WAS CROSS-EXAMINED BY 10:56  
26 MR. HARTY:

27 177 Q. MR. HARTY: Thank you, Superintendent Finan. At the  
28 time that is relevant to this Tribunal, you had been a  
29 superintendent for four years, I think?



1 A. Correct, yes.

2 178 Q. And you were moved Glenties and then to Ballyshannon?

3 A. That's correct, yes.

4 179 Q. And in the Ballyshannon district, just because I am bad  
5 on geography, Donegal Town is part of the Ballyshannon 10:56  
6 district, is that correct?

7 A. It is, yes.

8 180 Q. And as a result you would have been the superintendant  
9 responsible for directing Garda Harrison?

10 A. Yes. 10:57

11 181 Q. And also he was part of your assets, your workforce,  
12 the limited resources that you had at the time, every  
13 man counted, isn't that correct?

14 A. Correct.

15 182 Q. And the reports that were received from Rita McDermott, 10:57  
16 my reading of your statement, my understanding of your  
17 statement was that she was afraid that something was  
18 going to happen, was the primary concern in relation to  
19 it, that she was reporting that there were two future  
20 indents that the guards needed to be aware of? 10:57

21 A. That's correct, in August I think, or September.

22 183 Q. The September report?

23 A. Sorry, September, yes.

24 184 Q. That there could be a flash point at Keith Harrison --  
25 at Marisa Simms moving her belongings or moving his 10:58  
26 belongings out of the house was in fact what was  
27 suggested --

28 A. Yes, yes.

29 185 Q. -- on 2nd October. Or there could be a flash point at

1 the wedding?

2 A. Correct.

3 186 Q. And you wanted to notify the superintendents in both  
4 those districts of those potential flashpoints?

5 A. Yes. 10:58

6 187 Q. Now, we have heard no evidence of anybody doing  
7 anything in relation to the forewarning that you gave  
8 them, in that it appears that there was no question of  
9 increased patrols at Garda Harrison's house on 2nd  
10 October, nobody contacted anybody to see was Garda 10:58  
11 Harrison going to be in work on 2nd October, and also,  
12 there was no investigations taken in relation to Garda  
13 Harrison when he wasn't in work on the day of the  
14 wedding, as to where he was going to be. Strictly  
15 speaking, that just wasn't your remit? 10:59

16 A. No, I forwarded my report on.

17 188 Q. You forwarded your report and that's that. In relation  
18 to the conference then that took place on 8th October,  
19 what was the purpose for you attending?

20 A. I was district officer in Ballyshannon and as you have 10:59  
21 pointed out, Garda Harrison was part of my assets, he  
22 was part of my district. And because allegations had  
23 been made against him, I was to attend that meeting.  
24 At that stage I didn't know the exact detail of the  
25 allegations, so my understanding was that it was to 10:59  
26 bring me up to speed in relation to what the  
27 allegations were. Also in relation to the threats  
28 against Garda Harrison, I understood that there would  
29 be updates in relation to those as well. So it was to

1 be informed mostly, I was attending that meeting, I  
2 believe.

3 189 Q. Before that meeting and after you received the reports  
4 from Sergeant Durkin, did you get any other information  
5 or make any other inquiries with the sergeants in Donegal Town? 11:00  
6

7 A. In relation to?

8 190 Q. In relation to Garda Harrison, in relation to his  
9 movements, in relation to the threats, anything?

10 A. No, I don't believe I did. 11:00

11 191 Q. And did they come to you to offer you more information  
12 in relation to it?

13 A. It was in -- the meeting now, I was told about the  
14 meeting and this is where I would receive more  
15 information. 11:00

16 192 Q. Okay. The situation then at that meeting, you have no  
17 recollection of any discussion about the HSE?

18 A. No, I don't believe --

19 193 Q. Which coincides with Garda Campbell's recollection in  
20 relation to the matter? 11:00

21 A. I don't.

22 194 Q. Do recall the statement being read through?

23 A. I do.

24 195 Q. You think that insofar as you took notes, you noted it  
25 on the copy of the statement that you had? 11:01

26 A. And I am not saying that I did, but if I did that is  
27 probably --

28 196 Q. You didn't have a notebook in your hand when you went  
29 in?

1 A. No, no.

2 197 Q. And I think the last time we had notes taken in this --  
3 in a superintendent's office in Donegal or Letterkenny  
4 station was done on the back of a Pulse record. You  
5 didn't do it on the back of a Pulse record? 11:01

6 A. No.

7 198 Q. All right. You say that convincing arguments were made  
8 in respect of the section 102?

9 A. Yes.

10 199 Q. Now, you had been at this point a superintendent for 11:01  
11 four years?

12 A. Correct.

13 200 Q. Had you had occasion yourself to make a section 102  
14 referral?

15 A. I don't believe -- I was trying to think if I had. I 11:01  
16 cannot recall having done one at that stage. I have  
17 done a number since but not up to that point, I don't  
18 recall.

19 201 Q. Yes. They are not entirely common. I mean, there are 11:02  
20 entire divisions that don't make a section 102 referral  
21 in a year, isn't that correct?

22 A. I have made a fair few.

23 202 Q. At this stage?

24 A. At this stage, yes.

25 203 Q. Yes. But over the course of the four years prior to 11:02  
26 that, you don't think you had any reason?

27 A. I don't recall, no.

28 204 Q. Yes. So were you in a position to, shall we say,  
29 assist in relation to the debate as to the section 102

1 from your own experience at that stage?

2 A. As my experience as a police officer, probably in  
3 relation to -- I think it was harm was the  
4 conversation, around what harm was --

5 205 Q. Right. 11:02

6 A. -- and it seemed logical to me at the time that, you  
7 know, there was an argument there in relation to what  
8 harm was, but I accept fully now that the definition  
9 doesn't cover psychological harm.

10 206 Q. Right. Not putting it any further but in terms of the 11:03  
11 facts that you -- the experience that you now have and  
12 the knowledge you now have, you would not have made a  
13 section 102 referral on the basis of this report?

14 A. It's very easy to say that now.

15 207 Q. I appreciate it's in retrospect and I appreciate you 11:03  
16 are not criticising anybody in relation to making it at  
17 the time, but certainly your experience now, having  
18 made section 102 referrals subsequently, that you  
19 wouldn't make one on that factual matrix now?

20 A. No. 11:03

21 208 Q. How many officers in the Ballyshannon district were the  
22 subject-matter of a death threat at the time?

23 A. I believe Garda Harrison was the only one at that time.

24 209 Q. So I take it you noted that in your officers journal?  
25 A. No, I didn't. The reason being, there was a paper 11:04  
26 trail in relation to it. I had received a report from  
27 Superintendent English and I had a record of it.

28 210 Q. Okay. Just in fairness to you because I had to put it  
29 to chief superintendent, you are aware that you are

1 obliged to note things in your officers journal?  
2 A. I am not 100 percent sure that that would go into --  
3 it's not something I would put in, but I accept if  
4 there is a directive there in relation to it, that I  
5 haven't read lately, it may be there. 11:04

6 211 Q. Right. I will just assist you in that. It's directive  
7 120/04, it says:  
8  
9 "The daily record will include the following --"  
10 11:04  
11 It lists various things. And in relation to that:  
12  
13 "All investigations and the reasons for commencing  
14 same --"  
15 11:04  
16 Now you weren't involved in an investigation in  
17 relation to that, so I accept it doesn't come under  
18 that category.  
19  
20 "-- tasks relevant to key operational issues." 11:05  
21  
22 It could, an officer being under a death threat, fall  
23 within that category.  
24 A. But it wouldn't be an operation -- well, I wouldn't be  
25 taken any operational steps. 11:05  
26 212 Q. Okay. "Audits, inspections, visits to stations."  
27 Clearly not. "Absences", not relevant. "All  
28 matters/instances of importance." I think a death  
29 threat against a member is a matter of importance.

1 A. I accept that, yes.

2 213 Q. And while you didn't note it in your officers journal I  
3 think you would accept that it should have been noted  
4 in your officers journal?

5 A. I do, I do. 11:05

6 214 Q. You were then, and where I am confused in relation to  
7 your evidence is: After the meeting of the 8th October  
8 your recollection appears to be that dealing with  
9 Sergeant Durkin in relation to the Westport incident,  
10 you received a report from Sergeant Durkin, I think it 11:05  
11 was either 9th or 10th that he had spoken to the  
12 receptionist and the receptionist had clarified that  
13 there was nothing untoward as such --

14 A. Yes.

15 215 Q. -- or nothing appeared to be untoward. And you asked 11:06  
16 Sergeant Durkin to forward that. Did you forward on  
17 the report yourself as well?

18 A. What I noted was in Sergeant Durkin's email he did say  
19 a hard copy was coming in the post and my recollection  
20 is that I said we'd wait until it arrived and then 11:06  
21 forward that. I don't know if that was done. I cannot  
22 say it was.

23 216 Q. Right.

24 A. But I do know that Sergeant Durkin, he did confirm to  
25 me that he had forwarded the statement to Inspector 11:06  
26 Sheridan and I understand she did forward it straight  
27 away.

28 217 Q. Yes. And you in fact moved, there appears to have been  
29 a shuffle in the last week in October 2013 of the

1           superintendents in the Donegal division?

2           A.    Yes, yes, I was moved to Letterkenny, yes.

3 218 Q.    You moved to Letterkenny on 25th October to occupy the  
4           seat which had been left vacant for a number of months?

5           A.    Months, yes. 11:07

6 219 Q.    But what doesn't appear from your statement is any  
7           direction or any evidence in relation to a direction  
8           that Garda Harrison was to be kept on desk duties?

9           A.    I submitted a report on 24th September to the chief  
10          superintendent in Letterkenny and in my report I 11:07  
11          outlined the fact that Garda Harrison had been  
12          convicted of not having insurance and that it had been  
13          highlighted to me by the sergeants in Donegal Town that  
14          this was causing difficulty for the members in Donegal  
15          Town and also for the locals. I would say Donegal 11:07  
16          Town, the Gardaí in Donegal Town have probably one of  
17          the best relationships with the public that I have ever  
18          encountered, and they were anxious that this would be  
19          maintained. I sent the report to the chief  
20          superintendent, recommending that for Garda Harrison's 11:08  
21          own sake and also for the Donegal area, that he should  
22          be transferred, and I stated on the bottom of that  
23          report that pending a reply, that Garda Harrison would  
24          be confined to indoor duties.

25 220 Q.    And that was the transfer, the proposal had been a 11:08  
26          transfer to Letterkenny, to the comms room, is that  
27          correct?

28          A.    No, I am not sure if that was that time.

29 221 Q.    That certainly appears to be the notes of



1 superintendent Archbold, that there was a comms room in  
2 Letterkenny --

3 A. I'm not sure, yeah. I know that it was mentioned to me  
4 and I did agree to it at some stage, but I don't know  
5 when that was. 11:08

6 222 Q. When was that replied to?

7 A. Not while I was there.

8 223 Q. In relation to the application to the Commissioner to  
9 suspend Garda Harrison made on 10th October, was that  
10 forwarded to you? 11:09

11 A. No.

12 224 Q. Can I suggest to you that it's unusual it's been sent  
13 to the superintendent in the Milford division, with  
14 whom Garda Harrison was not working, and not sent to  
15 the superintendent in the Ballyshannon -- or sorry, 11:09  
16 district, I am afraid I slip up on that. It was sent  
17 to the superintendent in the Milford district but not  
18 to the superintendent in the Ballyshannon district.

19 A. My thoughts on it are that it may not have been in  
20 relation to where we were. Superintendent McGovern has 11:09  
21 an in-depth knowledge of regulations and law and my  
22 thoughts on it are perhaps that is why it was sent to  
23 him.

24 225 Q. Did you ever receive any correspondence in relation to  
25 the directive from chief superintendent Internal 11:10  
26 Affairs that Garda Harrison was to be kept on station  
27 duties in lieu of suspension?

28 A. I don't recall seeing that.

29 226 Q. It is something that you ought to have been forwarded?

1 A. I would imagine so, yes.

2 227 Q. Yes. In relation to Garda Harrison, and leaving aside  
3 the conviction in respect of his no insurance, I think  
4 there were no issues in your time in the district in  
5 relation to how he performed his functions as a member 11:10  
6 of An Garda Síochána?

7 A. When I arrived in Ballyshannon, Garda Harrison had been  
8 involved in a collision in Letterkenny and he was  
9 actually on sick leave.

10 228 Q. Of course. He was out sick for almost all the time 11:11  
11 that you were there.

12 A. Correct.

13 229 Q. I had forgotten that. He was in fact present for, I  
14 think, just for the last couple of weeks, as such.

15 A. That's correct, yes. 11:11

16 230 Q. Yes. And can I ask you, did you submit diaries or  
17 journals to the Tribunal for the purpose of inspection  
18 in relation to any of this?

19 A. I wasn't asked to, no.

20 231 Q. Okay. Thank you very much, superintendent. 11:11

21 A. Thank you.

22

23 MR. BARNES: No questions.

24 MR. DONAL MCGUINNESS: No questions, Chairman.

25

26

27

28

29

1 SUPERINTENDENT MICHAEL FINAN WAS RE-EXAMINED BY

2 MS. LEADER:

3 232 Q. MS. LEADER: Superintendent, just arising out of that,  
4 did you check your diary to see if you had any relevant  
5 entries? 11:11

6 A. I did at the time, yes. I did check my time to see was  
7 there anything of relevance, yes.

8 233 Q. And did you satisfy yourself there were none?

9 A. I did.

10 234 Q. I think you referred to one diary entry in relation to 11:12  
11 the time of the meeting, is that correct?

12 A. That's correct. I entered just the time of the meeting  
13 in my diary, yes.

14 MS. LEADER: Thank you very much.

15  
16 THE WITNESS THEN WITHDREW 11:12

17  
18 MR. MCGUINNESS: Chairman, the next witness is a  
19 Mr. Johan Groenewald. His statement is to be found at  
20 volume 7, page 2453. 11:12

21  
22 MR. JOHAN GROENEWALD, HAVING BEEN SWORN, WAS DIRECTLY  
23 EXAMINED BY MR. MCGUINNESS:

24 235 Q. MR. MCGUINNESS: Mr. Groenewald, I think you are a  
25 designated officer of the Garda Síochána Ombudsman  
26 Commission? 11:13

27 A. That's correct, Judge.

28 236 Q. And I think you are also a senior investigations  
29 officer?

1 A. That's correct, Judge.

2 237 Q. And you are delegated for the purposes of  
3 investigations under section 98 of the Act?

4 A. That's correct, Judge.

5 238 Q. Now, I think in your capacity as such, you were 11:13  
6 assigned to investigate a disclosure made by Garda  
7 Keith Harrison?

8 A. That is correct, Judge, yes.

9 239 Q. And on the 10th July 2015 you met Garda Keith Harrison?

10 A. That is correct, yes. 11:13

11 240 Q. Now, I think the purpose of meeting him was to record a  
12 statement for the purpose of your investigation?

13 A. That is correct, Judge.

14 241 Q. And I think present on that occasion was his solicitor,  
15 Mr. Trevor Collins, and investigating officer, Pauline 11:13  
16 Byrne, from the Commission?

17 A. That's correct.

18 242 Q. And I think a statement was taken from him in writing  
19 and was recorded on a DVD or a number of DVDs?

20 A. On two DVDs, a statement and two DVDs recorded. 11:14

21 243 Q. Contemporaneously?

22 A. Yes.

23 244 Q. And I think Garda Harrison also handed in an affidavit  
24 as part of that interview?

25 A. His affidavit was handed in, in support of his 11:14  
26 statement, yes.

27 245 Q. Now the Tribunal isn't inquiring into the disclosure,  
28 but I think you were asked by the Tribunal to provide a  
29 statement in response to an assertion by Mr. Harrison,

1 Garda Harrison, in one of his statements to the  
2 Tribunal, and could I ask the registrar to put up page  
3 34 of the documents? And in that second paragraph, I  
4 think it's six lines in -- five lines in, there is a  
5 following sentence:

11:15

6  
7 "On 10th July I met with Johan Groenewald, a senior  
8 investigator with GSOC, where I was interviewed in the  
9 presence of my solicitor. At the finish we spoke  
10 openly about what was going on. Mr. Groenewald said he  
11 had serious concerns about how Marisa's statement from  
12 October 2013 had been forced on GSOC by Chief  
13 Superintendent McGinn and the manner in which it was  
14 obtained in the first place, that it was extremely  
15 unusual."

11:15

16  
17 Now, that I think is being attributed to you,  
18 obviously. Do you have any recollection of saying that  
19 or anything similar?

20 A. I have no recollection of saying the words described  
21 there. I have a recollection during the course of the  
22 interview that it was explained to Garda Harrison in  
23 detail section 102 referral and section 85 referral.

24 246 Q. Yes. Well, can I ask you about this? What information  
25 had you had in relation to Marisa Simms' statement?  
26 Had you a copy of that?

11:15

27 A. At the time I was aware of the referral made. I used  
28 it only as background, I didn't rely on any information  
29 from that referral as I wanted to keep an open mind

1 going into the meeting. So I was not aware of the full  
2 contents of her statement made, but I was aware of the  
3 referral.

4 247 Q. And you are aware of the referral in the most general  
5 sense then, is it? 11:16

6 A. In the part of disclosure made about the row, that that  
7 incident of the 28th of September was referred to GSOC,  
8 yes.

9 248 Q. Well, had you carried out any investigation into the  
10 circumstances of the taking of the statement? 11:16

11 A. That was part of the plan but due to injury I received  
12 in November 2016 the investigation was reassigned, I  
13 did not complete my investigation.

14 249 Q. Yes. No, but as of the 10th July 2015, before that  
15 meeting and when you went into that meeting, had you 11:16  
16 carried out any investigation into the taking of Marisa  
17 Simms' statement?

18 A. I obviously requested, as part of my investigation I  
19 had to request information from An Garda Síochána to  
20 assist with the investigation and part of that was 11:17  
21 the -- the information request was the statement and  
22 all the information received from An Garda Síochána in  
23 relation to that referral. And I also had then the  
24 full file of the referral that GSOC had at the time of  
25 the referral. 11:17

26 250 Q. Yes.

27 A. So I have reviewed that. And also, I think it's in  
28 July 2016 I met with Marisa Simms to take a statement  
29 from her.

1 251 Q. In July?  
2 A. July 2016.  
3 252 Q. I am asking about this meeting only --  
4 A. No.  
5 253 Q. -- in July 2015. You understand that? 11:17  
6 A. Yes, I understand that.  
7 254 Q. Yes. And my question to you is: At the time of that  
8 meeting and in the period leading up to that meeting  
9 since you have become involved in investigating Garda  
10 Harrison's Protected Disclosure, had you made or 11:18  
11 conducted any investigation yourself into how Marisa  
12 Simms' statement had been taken?  
13 A. No. Not at that time, no.  
14 255 Q. Did you offer any opinion on 10th July about how her  
15 statement had been taken? 11:18  
16 A. I made no opinion in relation to that.  
17 256 Q. And would you have been in a position to offer an  
18 opinion on the 10th July 2015 about whether there had  
19 been anything untoward in relation to the taking of the  
20 statement? 11:18  
21 A. I didn't offer any opinion. Obviously Garda Harrison  
22 has given his account, but I didn't offer opinion in  
23 relation to that. What I do recall is when I have  
24 explained how GSOC got involved with the 102 referral,  
25 the words I used was that in my opinion that the 11:18  
26 referral was strange. And when I was asked what I mean  
27 about strange, I said that the referral in my opinion  
28 did not fit the criteria of death or serious harm. And  
29 I also explained that there was the matter of the

1 section 85, it could have been referred to, and I have  
2 explained what section 85 was as well.

3 257 Q. So, it was clear that you knew there had been a  
4 referral of her statement, you knew that GSOC I take it  
5 took the view that it probably didn't come within 11:19  
6 section 102 because there wasn't an issue of serious  
7 harm?

8 A. Yeah, I was aware of correspondence between that, yes.

9 258 Q. Yes. And that if it had been made it perhaps could  
10 have been made properly under section 85? 11:19

11 A. Yes.

12 259 Q. Yes.

13 A. Like, it's just that it didn't fit the criteria of  
14 death or serious harm, that is why I have explained the  
15 102 referral to Garda Harrison. 11:19

16 260 Q. Yes. But did you make any statement to the effect that  
17 the referral of her statement had been forced on GSOC  
18 by Chief Superintendent McGinn?

19 A. No.

20 MR. MCGUINNESS: Thank you. 11:19

21

22 MR. JOHAN GROENEWALD WAS THEN CROSS-EXAMINED BY  
23 MR. DALY:

24 261 Q. MR. DALY: Mr. Groenewald, Peter Daly is my name and I  
25 appear on behalf of Garda Harrison. I have a number of 11:20  
26 questions for you in relation to this. Firstly dealing  
27 with the issue highlighted by Mr. McGuinness in the  
28 statement at page 34, and it's quoted:  
29



1 "At the finish we spoke openly about what was going on.  
2 Mr. Groenewald said he had serious concerns about how  
3 Marisa's statement from October 2013 had been forced on  
4 GSOC by Chief Superintendent McGinn and the manner in  
5 which it was obtained in the first place, that it was 11:15  
6 extremely unusual, serious concern what occurred in  
7 Athlone but that it was troubling the actions of Garda  
8 management." [As read]  
9

10 Essentially that paraphrase there, would you agree with 11:20  
11 me that essentially the conversation that you had with  
12 Garda Harrison, be it at the end or throughout the  
13 interview, tallies with the contents of that?

14 A. No. That was not my words I have used, no.

15 262 Q. Well, I think in your direct evidence you referred to 11:20  
16 that it was strange, that it was a strange referral?

17 A. Yes, it was strange that it didn't fit the criteria of  
18 death or serious harm.

19 263 Q. And would you agree with me that strange and, the words  
20 used here are, extremely unusual, are somewhat similar 11:21  
21 if not the same?

22 A. I wouldn't say -- the referral itself is not unusual, I  
23 have dealt with several referrals in the past and I  
24 would not say that the referral was unusual.

25 264 Q. Right. But you would say it was a strange referral? 11:21  
26 A. Strange that it was 102 and not 85, yes.

27 265 Q. And how many referrals would you deal with on an annual  
28 basis?

29 A. Annual basis, it can vary from between 10 and 15 in a

1 year.

2 266 Q. In relation to those as to what, I suppose, break down  
3 would be section 102s compared to section 85s?

4 A. Well, as a senior investigating officer I would not  
5 deal with section 85. Section 85 is sent to our GSOC 11:21  
6 case and our casework section deals with section 85.  
7 As a senior investigating officer we only deal with  
8 section 102 when we receive the phone call from the  
9 superintendent who is making the referral.

10 267 Q. Right. In relation to, could I ask Mr. Kavanagh to put 11:21  
11 up page 1703. I think you said you had sight of the  
12 referral documentation, is that right?

13 A. I had sight of the -- yes. But not this document that  
14 you bring up. It's a document that would have been  
15 filled in by Darren Wright, who had received the 11:22  
16 referral. It is a document that we fill in, it's a  
17 referral document on the file. That is a document that  
18 I had sight of.

19 268 Q. And contained in whatever document that you were  
20 provided with, were you provided with the information 11:22  
21 which refers to the circumstances of the referral?

22 A. At the time of the meeting, no, I did not have this  
23 information.

24 269 Q. Right. And what was your understanding was the basis  
25 of the referral that you were being asked to 11:22  
26 investigate?

27 A. Sorry, can you repeat that?

28 270 Q. What was the basis of the referral? What was the  
29 reasons that there was a section 102?

1 A. My understanding was the incident on the 28th  
2 September, the row between Garda Harrison and Marisa  
3 Simms, that is the reason why the matter was referred  
4 to GSOC.

5 271 Q. And in relation to that, whatever knowledge you had at 11:22  
6 the time in your opinion did you see that there was any  
7 serious harm or injury in relation to what 102 being?

8 A. At the time of the information I had on the file, which  
9 I have only used as background, there was only  
10 described the incident that happened on 28th September 11:23  
11 and there was no mention of any death or serious harm  
12 in that.

13 272 Q. So then you would agree that it was an incorrect  
14 referral, a strange referral or an unusual referral?

15 A. The words I have used, it was strange, but that maybe 11:23  
16 it didn't fit the criteria of 102 and it may be more  
17 appropriate to send it under section 85. That was just  
18 my opinion I gave on that day.

19 273 Q. Have you ever had a referral dealt with where the basis  
20 of it was psychological harm or harm of the mind or a 11:23  
21 chance in the future that there may be injury? Have  
22 you ever dealt with a referral like that before?

23 A. No, not in that words. But we would have dealt with  
24 referrals where there was no injury, because the  
25 referral is a matter for the Gardaí, they decide to 11:23  
26 make the referral to us and what the -- the information  
27 or the basis of that referral, that is a matter for the  
28 Gardaí. We just take the information down.

29 274 Q. Right. And in relation to, would you be surprised

1 knowing that there was no investigation carried out in  
2 relation to the statement taken by Ms. Simms?

3 A. Are you asking me of my opinion now?

4 275 Q. Your own opinion, yeah. Are you surprised that there  
5 was no investigation carried out in relation to the 11:24  
6 statement?

7 A. I had no knowledge of what was done at the time, so I  
8 cannot comment really on that.

9 276 Q. No, but now, at this juncture, are you surprised that  
10 there was no investigation, looking back on it, were 11:24  
11 you surprised?

12 MR. MCGUINNESS: I wonder is that an appropriate  
13 question, because there is an assumption there that the  
14 witness knows everything that might be relevant to  
15 giving a proper answer to that question. It seems to 11:24  
16 be inviting a response which the witness probably can't  
17 give or it shouldn't be asked to give.

18 CHAIRMAN: Yes, Mr. McGuinness, I am not going to  
19 disallow the question. You can carry on, Mr. Daly, and  
20 in due course we are going to get to the Browne v. Dunn 11:25  
21 matter.

22 MR. DALY: May it please you, Judge.

23 277 Q. In relation to it, in hindsight looking back on it and  
24 in relation to what information you have now, are you  
25 surprised that there was no Garda investigation in 11:25  
26 relation to Ms. Simms' statement?

27 A. If there was no investigation carried, yes, I would be  
28 surprised, yes.

29 278 Q. You stated that you would be surprised, in

1 circumstances where the referral was made, can you  
2 comment at all in relation to whether it raised concern  
3 for you regarding the reasons for the referral?

4 A. No, it didn't raise any concerns.

5 MR. DALY: Thank you, Mr. Groenewald.

11:25

6  
7 CHAIRMAN: Well, is it your client's instructions that  
8 this was said?

9 MR. DALY: It is our position in relation to --

10 CHAIRMAN: It doesn't take very long, Mr. Daly, but you  
11 just might ask him.

12 MR. DALY: May it please you.

13 279 Q. Mr. Groenewald, in relation to, and just  
14 one final matter, I have to put it to you that Garda  
15 Harrison has said in his statement and his  
16 understanding of having met with you and discussed  
17 matters at length with you and discussed the section  
18 102 referral and the circumstances around that, that --  
19 and I will read out the quote to you, I have to put it  
20 to you:

11:26

11:26

21  
22 "At the finish we spoke openly about what was going on.  
23 Mr. Groenewald said he had serious concerns about how  
24 Marisa's statement from October 2013 had been forced on  
25 GSOC by Chief Superintendent McGinn and the manner in  
26 which it was obtained in the first place, that it was  
27 extremely unusual, serious concerns over what occurred  
28 in Athlone but that it was troubling the actions of  
29 Garda management towards me and my family since making

11:26

1 my disclosures particularly around the death threats  
2 and the manner they were investigated."

3  
4 I have to put it to you that you had a conversation and  
5 that Garda Harrison took from that conversation that 11:27  
6 understanding.

7 A. No, I reject that. I would have had that conversation  
8 on video.

9 MR. DALY: Thank you. I have no further questions.

10  
11 MR. GROENEWALD WAS THEN QUESTIONED BY THE CHAIRMAN:

12 280 Q. CHAIRMAN: Is there in fact a video of this interview?

13 A. Yes, Judge. I have disclosed it. There is a video.  
14 And if I can just clarify, Chief Superintendent McGinn  
15 was never mentioned as the referral. It was in 11:27  
16 relation to Inspector Sheridan, that was pursuing the  
17 matter because of her connection with Superintendent  
18 Sheridan, so that was my understanding, never Chief  
19 Superintendent McGinn.

20 281 Q. CHAIRMAN: Had you ever heard of Chief Superintendent 11:27  
21 McGinn?

22 A. I knew Chief Superintendent McGinn, yes, personally,  
23 yes.

24 282 Q. CHAIRMAN: You had met her?

25 A. I had met her and I had previous dealings with her, 11:27  
26 yes. But on the day Chief Superintendent McGinn was  
27 not the issue of the referral, the pursuing of the  
28 matter was against Inspector Sheridan.

29 283 Q. CHAIRMAN: So you wouldn't have mentioned her? You

1 didn't know she had anything to do with it?

2 A. The only mention I have made at the time of the  
3 referral is that she was part of the referral made.  
4 But the taking of the statement and the matter was  
5 referred was in relation to Inspector Sheridan, because 11:28  
6 she niece of Chief Superintendent Sheridan, and that is  
7 the information Garda Harrison has provided on the day  
8 of the interview.

9 284 Q. CHAIRMAN: Do you ever kind of comment about Garda  
10 matters in this way, kind of? 11:28

11 A. No, no, Judge. I would not give my opinion. That was  
12 not the purpose of that interview that day, was to get  
13 his disclosure.

14

15 MR. GROENEWALD WAS CROSS-EXAMINED BY MR. DIGNAM: 11:28

16 285 Q. MR. DIGNAM: Mr. Groenewald, my name Conor Dignam. I  
17 appear on behalf of An Garda Síochána. I just have two  
18 questions for you. The first just arises from that  
19 discussion which you just had with the Chairman. I may  
20 have misunderstood you, Mr. Groenewald, but did you say 11:28  
21 that Garda Harrison told you at this meeting that  
22 Inspector Sheridan was the niece of Chief  
23 Superintendent Sheridan?

24 A. That is correct. That is what he said at the meeting  
25 and that is why she was pursuing the matter. 11:28

26 286 Q. And that is why she was pursuing that matter?

27 A. That is correct, that is the information --

28 287 Q. That is what Garda Harrison said to you on the day?

29 A. -- and it is on the DVD, yes.

1 288 Q. I don't think you have been here for the duration of  
2 the hearing?

3 A. No, but I did follow the transcripts, yes.

4 289 Q. And you would have seen that I think both Chief  
5 Superintendent Sheridan and I think Inspector Sheridan 11:29  
6 said that they are not related at all.

7 A. Yes, I saw that evidence, yes.

8 290 Q. And then finally, Mr. Groenewald, in relation to the  
9 question that you were asked by Mr. Daly about your  
10 opinion or whether you were surprised that no 11:29  
11 investigation was carried out, do you have any  
12 knowledge of the steps that were taken, in other words  
13 that Superintendent McGovern was appointed to carry out  
14 an investigation and was then replaced by  
15 Superintendent Murray, were you aware of those two 11:29  
16 steps that are taken?

17 A. I became aware during the course of my investigation  
18 that steps were taken to investigate the matter and it  
19 was my understanding it was Superintendent Murray, that  
20 is when I became aware she was appointed to 11:29  
21 investigate.

22 291 Q. And the Tribunal will hear from Superintendent Murray  
23 and what happened to her investigation.

24 A. Yes.

25 MR. DIGNAM: Thank you, Mr. Groenewald. 11:29  
26

27 MR. MCGUINNESS: Thank you, Mr. Groenewald.  
28

29 THE WITNESS THEN WITHDREW



1 MR. MCGUINNESS: The next witness is Mr. Darren Wright.

2

3

MR. DARREN WRIGHT, HAVING AFFIRMED, WAS DIRECTLY

4

EXAMINED BY MR. MCGUINNESS:

5 292 Q. MR. MCGUINNESS: Mr. Wright, I think you are a 11:30

6 designated officer of the Garda Síochána Ombudsman

7 Commission, and you are currently the Director of

8 Investigations for GSOC, as it's known?

9 A. That's correct, Chair.

10 293 Q. And I think on the 8th October 2013, as a senior 11:31

11 investigating officer, you were on call, as it were, on

12 duty, for receipt of any section 102 referrals from the

13 garda Síochána?

14 A. That's correct.

15 294 Q. And the Tribunal has seen the section and obviously it 11:31

16 authorises the Commissioner and those delegated by the

17 Commissioner to make such referrals, isn't that

18 correct?

19 A. That's correct, yes.

20 295 Q. And such referrals are made frequently over the phone 11:31

21 as a result of some incident, isn't that right?

22 A. They're almost exclusively made over the phone as a

23 result of some incident, yeah.

24 296 Q. And they can be made in circumstances where some 11:31

25 obvious and drastic harm has been caused to a member of

26 the public or death through some actions of a member of

27 An Garda Síochána, whether accidentally, deliberately

28 or negligently, the matter must be referred to GSOC in

29 those circumstances?

1 A. They can be referred in those circumstances, yes.

2 297 Q. Yes. But the obligation is to refer in accordance with  
3 the section, isn't that correct?

4 A. Yes, it is. But I think you said in circumstances  
5 where there has been serious harm, there are 11:32  
6 circumstances referred to us where there has been no  
7 such serious harm, so we get quite a wide range of  
8 referrals.

9 298 Q. Yes, yes. And I think from the point of view of the  
10 receipt of such referrals, GSOC and you would be always 11:32  
11 conscious that the threshold for referral by the Gardaí  
12 is a decision as to whether it appears that there may  
13 have been such, and there may not turn out to have been  
14 serious harm, but you don't criticise the referral in  
15 those circumstances, I think? 11:32

16 A. The position, Chair, is that the decision to refer is  
17 one for the guards and the guards alone. That is both  
18 outlined in the Act and also in their own directive,  
19 internal directive 10/10, which I understand has been  
20 provided to the Tribunal. I have a copy here with me 11:33  
21 today.

22 299 Q. Yes.

23 A. The directive is useful, in that it explains quite  
24 nicely the principle of clear blue water, if I can put  
25 it that way, between the decision to refer being the 11:33  
26 guards and the guards alone and the decisions then  
27 around what happened subsequent to that referral, to be  
28 a matter entirely for GSOC. Now, what it goes on to  
29 say is that neither organisation shall trespass

1           essentially on the remit or responsibilities of the  
2           other. So, yes.

3 300 Q. Now, we are not here to decide obviously on the  
4           legality of the directive, but the directive appears to  
5           have been formulated with a view to ensuring that any 11:33  
6           misconduct alleged against a guard arising out of their  
7           behaviour does get sent to GSOC?

8           A. No, I would not agree.

9 301 Q. You wouldn't agree with that?

10          A. I would not, no. 11:34

11 302 Q. Okay. Well, how do you see that as operating vis-à-vis  
12          GSOC?

13          A. I see that directive as operating where conduct may  
14          have caused death or serious harm, not any misconduct.

15 303 Q. Yes. Well, the terms of the directive, it's not 11:34  
16          exclusively related to section 102?

17          A. No, it covers other matters.

18 304 Q. Yes.

19          A. It covers notifications on the discharge of firearms  
20          and -- I think, I have it with me here if you would 11:34  
21          like me to refer to it.

22 305 Q. Well, it's at page 2495 of our documents.

23          A. This being?

24 306 Q. And you are referring to directive --

25          MR. HARTY: I think there is a cross-purposes. I think 11:34  
26          Mr. Wright is referring to directive 10/10 and  
27          Mr. McGuinness is referring to 50/13, a different  
28          directive.

29 307 Q. MR. MCGUINNESS: Yes, that is true, but you are aware

1 of 50/13, are you?

2 A. May I see it, please?

3 308 Q. Yes. It's 2495.

4 CHAIRMAN: Have you got a hard copy there?

5 A. I can see it on the screen, Chair, thank you. I can't 11:35  
6 honestly say whether I have seen that or not. It  
7 doesn't look familiar, no.

8 309 Q. MR. MCGUINNESS: Okay. Well, it appears to be, as it  
9 were, a supplementary directive, a follow-on from  
10 10/10, number 50/2013 which seems to require 11:36  
11 allegations of misconduct arising out of the behaviour  
12 of a guard to be referred to GSOC.

13 A. Okay. This looks to refer to matters under 85 --

14 310 Q. Yes.

15 A. -- of the Act where a complaint is made under certain 11:36  
16 circumstances as prescribed by the '05 Act, yes.

17 311 Q. Yes. Now, obviously from GSOC's point of view, you do  
18 look at whether matters have been referred in the  
19 prescribed way by a person entitled to make it, and  
20 GSOC then examines it, whether it might be admissible 11:36  
21 under the relevant sections or whether it was properly  
22 referred under section 102. You can and do look at  
23 both of those matters?

24 A. In terms of 85 and the subsequent admissibility  
25 decisions arising from that, there are indeed certain 11:36  
26 criteria that need to be -- we need to be satisfied  
27 with in order to determine that matter admissible. In  
28 respect of a 102 referral, as I have already said, I  
29 think, the decision to refer is one for the guards and

1 it's not one for us to get behind, query in any way,  
2 question the validity or legitimacy of it. What I do  
3 have to do is ensure that I have a sound basis on which  
4 to launch any investigation that we might consider  
5 arising from the referral. 11:37

6 312 Q. Yes. And obviously that's quite reasonable. You have  
7 to decide for yourselves, or the Commission has to  
8 decide for itself --

9 A. Yeah.

10 313 Q. -- whether you are acting then in accordance with and 11:37  
11 within your statutory powers?

12 A. We have to act in accordance with our statutory powers.  
13 I would like the Tribunal to be clear around the --  
14 2005 Act is a highly technical and complex piece of  
15 legislation. It is very difficult to navigate. I have 11:38  
16 been with GSOC for in excess of ten years, and I have  
17 never yet once been involved in a criminal trial  
18 involving a Garda member where we have not been put on  
19 full proofs. And one of the very first things to be of  
20 interest to the Court is the mechanism of referral in 11:38  
21 the case of a 102 incident coming in before the Court.  
22 To that end, what I'm interested in documenting is the  
23 rationale I am given at the time, the reason I am given  
24 at the time, the basis on which the 102 is made rather  
25 than questioning -- I mean, I have been following the 11:38  
26 Tribunal through some of the transcripts.

27 314 Q. Yes.

28 A. I have heard evidence given by various witnesses around  
29 this notion that GSOC can reject or decline to accept

1 or refuse or other vocabularies being used around 102  
2 referrals, that does not arise at all under any  
3 circumstances.

4 315 Q. You accept it and then you have to decide for  
5 yourselves what you are going to do with it?

11:39

6 A. We have to accept it, yes. We have to accept it. If a  
7 referral -- and this has been our position from  
8 commencement in 2007: If the phone rings a, referral  
9 has been made, the decision to refer is one for the  
10 guards, I am repeating myself, but when that referral  
11 is made it's not a notion of whether or not we can  
12 choose to accept it, decline it, whatever. We have to  
13 then take some action and that action is down to us to  
14 determine.

11:39

15 316 Q. And it follows from that, it's a question I was going  
16 to come to in due course on the facts of the case, but  
17 have you ever had an example of An Garda Síochána  
18 trying to, as it were, withdraw a referral or, as it  
19 were, reverse a decision to make a referral? That is I  
20 think not within your experience, is it? There is no  
21 statutory power?

11:39

11:39

22 A. There is certainly no statutory provision. I have had  
23 on a very small number of occasions many, many years  
24 ago, when people were becoming familiar with the Act,  
25 or in for example the case of newly promoted  
26 superintendents who were unfamiliar with making  
27 referrals, the phone has rung, the circumstances have  
28 been given and the decision has been not to refer the  
29 matter.

11:40

1 317 Q. Yes.

2 A. But that decision has been very carefully documented  
3 and forwarded to me.

4 318 Q. Yes.

5 A. Because the phone has rung, essentially. 11:40

6 319 Q. Yes. But I think on a strict statutory basis they have  
7 no power to revoke a referral?

8 A. No.

9 320 Q. And you have no power to require them to do it?

10 A. No, absolutely not. 11:40

11 321 Q. So when the phone rang at 12:35 on 8th October, you  
12 have documented in your statement that you received a  
13 referral from Superintendent McGovern?

14 A. Chairman, may I refer to my notes?

15 322 Q. Yes. 11:40

16 A. This is my daybook, which I have tendered a copy of to  
17 the Tribunal. Yes, on 8th October 2013 I was on call  
18 and I have recorded that referral at 12:35 hours, that  
19 is to say midday.

20 323 Q. Yes. Perhaps we would just look at page 1607 of our 11:41  
21 documents. This is your handwritten notes, 12:35:

22

23 "Call received from Ray Keogh --"

24

25 That is Command and Control. 11:41

26

27 "-- re referral of threats to kill by Garda member to a  
28 female member of the public from Eugene McGovern,  
29 Milford Garda Station, Donegal."

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 then:

"12:45 Called Eugene McGovern back. Garda Keith Harrison, Donegal Town, ongoing relationship, Marisa Simms, separated, ongoing domestic issues, concerns raised by mother and sister, upcoming wedding. KH not invited. Ongoing threats to kill and --"

11:41

I am not sure what the next --

11:41

A. "Burn her out."

324 Q. "-- burn her out. Continuous harassment. 2/3 --" what does that say?

A. "2/10", is that?

325 Q. 2/10?

11:42

A. "First formal statement made to AGS --" An Garda Síochána "-- Rita McDermott".

326 Q. Rita McDermott.

A. Yes.

327 Q. "Keith Harrison had been on sick leave, section 102 referral April 2013. Friday, 4/10 18:50, 999 call received to Letterkenny that he had been subject of punishment shooting. MS --"

11:42

That is Marisa Simms, is that right?

11:42

A. That's correct.

328 Q. "-- sister of Martin McDermott."

A. "killed".

329 Q. "killed a guard in RTA --"



1 A. "RTC".

2 330 Q. And then there is a suspect named?

3 A. There is.

4 331 Q. "Related to McDermotts who was to carry it out." Is  
5 that "Saturday 999 call, got times wrong, was to --" 11:42  
6 what is that?

7 A. "Be Saturday night".

8 332 Q. "-- was to be Saturday night. MS asked --" is it?

9 A. Agreed.

10 333 Q. "-- agreed to go to the Garda station on Sunday 6/10 to 11:43  
11 make statement against KH." And then an arrow  
12 "alleged --"?

13 A. Minor.

14 334 Q. "-- minor assaults and serious harassment in 23-page  
15 statement. Inspector Goretta Sheridan." Her number 11:43  
16 there. "Took statement from MS. Agreed E McGovern to  
17 send through all documents for --" what is that, "MS"?

18 A. "My review asap via email."

19 335 Q. Yes. As what?

20 A. "So GSOC can then decide how best to respond." 11:43

21 336 Q. Okay. "Made it clear to E McGovern that despite any  
22 complaint or referral being made to GSOC, the  
23 protection of life and property is entirely a matter  
24 for An Garda Síochána. So if there is considered any  
25 risk to either KH or MS --" Is that a matter? 11:44

26 A. "Then AGS then need to deal with it."

27 337 Q. "AGS then need to deal with it. EMCG confirmed he  
28 understood this and confirmed he was making a section  
29 102 referral due to psychological harm to MS."

1 A. Yes.

2 338 Q. And then "1300"?

3 A. Yes.

4 339 Q. Does that last bit relate to the end of your  
5 conversation? 11:44

6 A. No, it relates to at 1300 hours, so immediately after  
7 receipt of the referral I called and spoke with acting  
8 deputy director of operations, Brian O'Doherty.

9 340 Q. Just stopping there.

10 A. Sorry. 11:44

11 341 Q. That entry at 1300, that seems to represent the end of  
12 your phone call --

13 A. Yes, sorry.

14 342 Q. -- with Superintendent McGovern?

15 A. Yes. 11:44

16 343 Q. And you then phone the assistant director, is that  
17 right?

18 A. Acting deputy director.

19 344 Q. Acting deputy director. And you spoke with him and:  
20 11:45

21 "Referral discussed. Agreed that it should have been  
22 notified as a complaint to GSOC on receipt of the  
23 statement at the weekend. Agreed to leave the referral  
24 part in section 91 for the time being pending a review  
25 of available docs. Then to possibly designate as 11:45  
26 section 98."

27

28 okay. Can I just pause there? It doesn't appear that  
29 in the course of your phone call that you queried with

1 Superintendent McGovern whether it should be a section  
2 102 referral or whether it should have been a referral  
3 under some other section, is that right?  
4 A. That is not right, no.  
5 345 Q. That is not right? 11:45  
6 A. No.  
7 346 Q. Okay. Sorry, is there a record there of querying  
8 whether there should be another section in your  
9 conversation with Superintendent McGovern?  
10 A. Yes. And apologies for my shorthand, but these notes 11:46  
11 are written contemporaneously. I have a habit in my  
12 daybook of marking significant or important matters  
13 with asterisks.  
14 347 Q. I see an asterisk on page 1609 in the middle?  
15 A. There are two, at the beginning and end of that 11:46  
16 paragraph. Maybe it's cut off the photocopy, I don't  
17 know. But certainly in my book here there are two  
18 asterisks.  
19 348 Q. Yes.  
20 A. And the very final part of that reads: 11:46  
21  
22 "EMCG --" Eugene McGovern "-- confirmed he understood  
23 this and confirmed he was making a section 102 referral  
24 due to psychological harm to Marisa Simms."  
25 11:46  
26 Now, the bulk of this entry relates to the referral  
27 itself. I have had a conversation then with Eugene  
28 clarifying why this has been referred under 102; where  
29 was the death? Where was the serious harm? And that

1 is my entry there. That he has re-confirmed that he  
2 was making a 102 due to psychological harm.

3 349 Q. Okay. Perhaps I hadn't asked you what other discussion  
4 you had, but there is no mention of section 83 or 85?  
5 A. 85, no. 11:47

6 350 Q. None. And that is why I am wondering, did you discuss  
7 that explicitly with him during this phone call prior  
8 to phoning acting director O'Doherty?  
9 A. Did I discuss what?

10 351 Q. The issue of whether it should be under a different 11:47  
11 section?  
12 A. No. I may have done, I don't know. If I did, I didn't  
13 write that down. I would just like to clarify --

14 352 Q. Yes?  
15 A. -- the referral has been made, so whether it should or 11:47  
16 should not have been made under a different section,  
17 the referral was made and it's made, it's accepted, I  
18 then have to deal with it.

19 353 Q. It's accepted, all right, okay. In any event, you then  
20 record later on the day, you terminated duty at that 11:48  
21 point in time?  
22 A. Yes.

23 354 Q. You say in your statement the matter was accepted as a  
24 referral and was examined by you pursuant to section  
25 91, is that right? 11:48  
26 A. That's correct.

27 355 Q. And I think you created a log sheet then, if we look at  
28 page 1611. Was that created by you on the day then?  
29 If we could just call that up, 1611.

1 A. If could you go directly to the end of that document,  
2 please.

3 356 Q. Yes. It goes on to two pages?

4 A. Two pages, yes.

5 357 Q. Two pages. It's signed off as dated 9th? 11:48

6 A. Yes. So that was the following day, yes. I think I  
7 was out of the office when I took the call and when I  
8 returned the following day I completed the log sheet  
9 based on my notes. And that is why it's dated 9th  
10 October, the following day. 11:48

11 358 Q. Yes, yes. I think we have heard from Mr. O'Doherty and  
12 he noted a phone call that he had with you in which you  
13 refer to the referral, if I could refer it that way, do  
14 you recall that conversation?

15 A. I recall an email. 11:49

16 359 Q. Yes.

17 A. I don't recall a phone call. But that may be on the  
18 electronic record of the case back at the office.

19 360 Q. Okay.

20 A. I don't have that in my notes. 11:49

21 361 Q. In any event, you did send an email to Mr. O'Doherty?

22 A. Yes.

23 362 Q. And --

24 A. Asking for the matter to be logged on to the system.

25 363 Q. Yes. Yes. And then you created this form that we are 11:49  
26 looking at here?

27 A. Yes.

28 364 Q. And is there anything of particular relevance that you  
29 want to say about that? You say under heading:

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

"Examination Section 102(2)(a)  
Is the referral one of death or serious harm?"

And you say "no". Would that stop it being considered by GSOC? 11:49

A. No.

365 Q. Okay.

A. No. The duty to account or the rationale for explaining the basis on which the 102 is made is a matter for the guards and I have already highlighted how it's not a matter for us to get behind that or undermine that in any way. So, no, the referral is made and we then have to consider it. 11:50

366 Q. Okay. So even if one takes the view it's perhaps an erroneous one, you still have a duty to consider it? 11:50

A. Absolutely. And we have received, over the years, erroneous, what I would consider to be erroneous 102 referrals.

367 Q. Yes. I think the matter was processed and did you refer to the casework officer or Mr. O'Doherty? 11:50

A. Could you repeat that please?

368 Q. Did you refer the matter to the casework officer or to Mr. O'Doherty?

A. To Mr. O'Doherty. I asked for -- I asked for the referral to be created on our case-management system, our CMS, as a case and for it to be logged as a complaint, given the content of statements received from An Garda Síochána. 11:50

1 369 Q. Yes. Now, is there anything unusual in doing that?  
2 A. No, that would be standard procedure.

3 370 Q. Yes. Now, correct me if I am wrong, there doesn't  
4 appear to be a statutory, as it were, conversion power  
5 to convert a referral into a complaint, is that right? 11:51  
6 A. No, a referral is a referral. I would use the term  
7 "complaint" interchangeably I guess with case or case  
8 file or --

9 371 Q. Yes.  
10 A. We were in receipt of a statement of complaint and I'd 11:51  
11 asked for the matter to be raised as a complaint on the  
12 CMS.

13 372 Q. Yes. And am I correct in saying that it had the  
14 appearance of a complaint in the sense that it was made  
15 by a member of the public in a Garda station related to 11:51  
16 the conduct or misbehaviour of a guard?  
17 A. Absolutely.

18 373 Q. And were the person to have consented to allow GSOC to  
19 deal with it, you could have actually dealt with it in  
20 a substantive way? 11:52  
21 A. Yes.

22 374 Q. Okay. So, the person then who had made the complaint,  
23 it was appropriate to consult them, is that right?  
24 A. Yes. And again that would be standard procedure, when  
25 we receive matters -- referred to us under 85, 11:52  
26 depending on the information we have received, we would  
27 make contact with the complainant and confirm with them  
28 that they wished for this matter to be dealt with by  
29 GSOC.

1 375 Q. And if they say yes or no, GSOC can either go ahead or  
2 not go ahead?

3 A. Yes.

4 376 Q. And that is irrespective of either the wishes or the  
5 views of either Garda management or whoever had 11:52  
6 referred it, whatever superintendent had referred it,  
7 they have no say in that issue?

8 A. No, they have no say in that issue.

9 377 Q. Okay. And I think you were informed and you had a  
10 conversation, did you, with -- you didn't have a 11:53  
11 conversation yourself with Ms. Simms, is that right?

12 A. I had no conversation, Chair, with Ms. Simms, no.

13 378 Q. Or with Ms. Rita McDermott?

14 A. Nor with Ms. Rita McDermott, no.

15 379 Q. But I think you became aware that Ms. Simms confirmed 11:53  
16 by email that she didn't want the matter to be  
17 considered by GSOC?

18 A. I became aware of that, yes.

19 380 Q. Okay. And I think you formally made a report, is that  
20 correct, in relation to the matter, yourself? 11:53

21 A. Yes, Chair. The Act requires me on closure of a 102  
22 referral to report to various parties, one of which  
23 would be the Minister for Justice of the day. And I  
24 created such a report under section 103 of the Act and  
25 forwarded that on to that office. I also made a 11:53  
26 closure report entry on our case-management system,  
27 outlining the reason for the closure of the case.

28 381 Q. And I think you reported, as required, inter alia to  
29 the department and I think you have provided a copy of



1 your closure report at page 1614?

2 A. Yes.

3 382 Q. Perhaps if you would just look at that and confirm  
4 that.

5 A. Yes, Kevin Clarke, who is named at the top of that 11:54  
6 correspondence, was the recipient for reports from us  
7 following 102 referrals that have then been closed.

8 383 Q. Yes. And I think that recites the course of events  
9 that we have discussed in your questions and answers?

10 A. It does, very briefly. We don't go into a large amount 11:54  
11 of detail on these reports, but very briefly, yes.

12 MR. MCGUINNESS: All right. Thank you. Would you  
13 answer any questions anyone else may have?

14 A. Of course.

15

11:54

16 MR. WRIGHT WAS CROSS-EXAMINED BY MR. HARTY:

17 384 Q. MR. HARTY: Thank you, Mr. Wright. I am counsel for  
18 Garda Harrison. And just so that we are clear in  
19 relation to it, ordinarily it's section 83 that  
20 provides for the making of a complaint, and that is, it 11:55  
21 provides who may make a complaint and where they can  
22 make a complaint?

23 A. Yes, it does.

24 385 Q. Then section 85 deals with the specific circumstances  
25 of a complaint being made to An Garda Síochána and what 11:55  
26 An Garda Síochána are to do with it, isn't that  
27 correct?

28 A. It relates to the mechanism of how that is transmitted  
29 to GSOC, yes.

1 386 Q. And acknowledged to the person making the complaint at  
2 the time as well?

3 A. Yes. It requires certain things to be done, let's put  
4 it that way.

5 387 Q. Yes. It makes sure that if a person goes into a Garda 11:55  
6 station that they are handed a receipt in respect of it  
7 in some form and that the steps are then taken to  
8 forward it on up the --

9 A. That's right, yes.

10 388 Q. And then section 102 is in effect -- deals with the 11:55  
11 emergency response unit as such from GSOC. This is  
12 where you receive something, you are phoned in  
13 directly, contacted, and you have to commence an  
14 investigation almost immediately in many section 102  
15 cases, isn't that correct? 11:56

16 A. Well, yes, we have to commence an investigation  
17 immediately. The nature of which is a matter for us  
18 and there are a number of options available to us.  
19 Your comment around the emergency response element,  
20 certainly we are on call 24 hours a day, 365 days a 11:56  
21 year, so if the phone rings at 3:00am then someone is  
22 answering that and dealing with it at 3:00am, yes.

23 389 Q. And that is because it can often be necessary for you  
24 to attend at scenes of accidents as soon as you  
25 possibly can, because there could be relevant evidence 11:56  
26 there that would need to be preserved, and while the  
27 guards have an obligation to preserve it you have an  
28 obligation as well to get as much information as you  
29 can as quickly as you can?

1 A. Yes. We also have obligations to secure and preserve  
2 evidence, yes. So sometimes we would deploy to a scene  
3 immediately and commence scene examination, evidence  
4 recovery, identification of witnesses, CCTV, house to  
5 house, all the usual things you would expect. 11:57

6 390 Q. Yes. And that is why, unlike a section 83 complaint,  
7 which is forwarded on through section 85, which comes  
8 in through a desk, it comes in through post or  
9 electronic, I presume, or somebody has made it  
10 themselves at the offices of GSOC, that is processed 11:57  
11 through and an admissibility decision is made in  
12 relation to those complaints, isn't that correct?

13 A. It is, yes. But I would draw the distinction around,  
14 some of those matters do become what we would call  
15 fast-tracked because of the potential for evidence to 11:57  
16 become, lost, concealed or destroyed, so yes.

17 391 Q. So you can often even in those -- you endeavour to  
18 engage in the admissibility and the decision in  
19 relation to what investigative stream should be  
20 followed -- 11:57

21 A. Yes.

22 392 Q. -- as quickly as possible in relation to all of them?

23 A. Yes, yes.

24 393 Q. When a section 102 referral on the other hand is --  
25 there is no admissibility decision in respect of a 11:58  
26 section 102, isn't that correct?

27 A. That's correct, yes.

28 394 Q. You are obliged, once you receive it, to examine it  
29 under section 91?

1 A. That's correct.

2 395 Q. And under section 91 you are to assess it and say: Has  
3 there been serious harm and death caused? Because it  
4 hasn't been opened before the Tribunal, I just, I am  
5 just going to read it out.

11:58

6

7 "If a complaint concerns the death of, or serious harm  
8 to, a person as a result of Garda operations or while  
9 in the custody or care of the Garda Síochána, the  
10 Ombudsman Commission shall immediately direct a  
11 designated officer to --"

12

13 And that is (a) and (b):

14

15 "(A) examine the complaint for the purpose of  
16 recommending whether the complaint should be  
17 investigated under section 95 or 98, and  
18 (B) report his or her recommendation to the Commission  
19 as soon as practicable."

20

21 Now this, in fact, doesn't fall within section 91  
22 either because that has got to do with Garda custody  
23 and the complaints obviously were off duty. But you  
24 engaged in a section 91 assessment of the matter, isn't  
25 that right?

11:59

26 A. Of this particular 102 referral, yes, I did.

27 396 Q. Yes. And during the course of the conversation with  
28 Superintendent McGovern, you are making it clear that  
29 this does not appear to have resulted in the death and

1 serious harm of anybody?

2 A. There was certainly -- if we can take this in two  
3 parts. There was certainly no death, that was  
4 immediately apparent. The serious harm aspect of this  
5 was the only mechanism that I could see that would be 11:59  
6 available to make a 102 referral. And so, it's  
7 incumbent on me to understand, log exactly what is the  
8 serious harm here. And in fact in other matters one of  
9 the first questions we would ask on receipt of a  
10 referral are what are the nature of the injuries. 12:00

11 397 Q. Yes.

12 A. So in this case, it was not clear to me why it was  
13 being referred, although serious harm would seem to be  
14 the only avenue available.

15 398 Q. Yes. 12:00

16 A. And on that, I did query, it looks from my note here,  
17 what exactly is the serious harm or what exactly is the  
18 rationale for the referral and I was told psychological  
19 harm to MS, Marisa Simms.

20 399 Q. Yes. 12:00

21 A. I should say I have erroneously written down that  
22 earlier in the logbook as Melissa Simms but we are  
23 talking about Marisa Simms, yes.

24 400 Q. Yes. You are receiving this phone call, you certainly  
25 don't appear to have been at your desk I think when you 12:00  
26 took this call?

27 A. I was performing office duties at my home address, I  
28 can see from my logbook, as my wife was away training  
29 and we had young children at the time, so we have

1 remote connectivity into the office, the children were  
2 at school, and I was performing office duties when I  
3 received the call.

4 401 Q. And you were given this psychological harm?  
5 A. I was, yes. 12:01

6 402 Q. Now, would you agree with me that that doesn't come  
7 within your understanding of serious harm means an  
8 injury that creates a substantial risk of death, causes  
9 serious disfigurement or causes substantial loss or  
10 impairment of mobility of the body as a whole or the 12:01  
11 function of any particular bodily member or organ?  
12 A. I would agree with you, the Act is very clear and  
13 defines what serious harm consists of and, in addition,  
14 I think that is further underlined in the Headquarters  
15 directive 10/10 explaining what is serious harm. It's 12:01  
16 a judgement at the end of the day but it's based on  
17 that definition, yes.

18 403 Q. And I think Headquarters 10/10 -- it wasn't open to,  
19 you are referring to it. 10/10 says that may have  
20 caused in relation to that, is that if there is any 12:02  
21 possibility that serious harm was caused and you don't  
22 know yet the extent of it you are not obliged to wait  
23 and receive the medical report to show that the extent  
24 of the injury, which you would obviously if it was a  
25 criminal trial for assault causing serious harm, but 12:02  
26 all you are obliged to do is, once you have that  
27 suspicion that that level of harm has occurred, you  
28 should refer it under section 102 --  
29 A. Yes.

1 404 Q. -- isn't that what 10/10 says?  
2 A. 10/10 does say that and so does the Act. And I would  
3 be clear that the inclusion of the word "may", which I  
4 believe should be underlined and in bold, is extremely  
5 important. The threshold is actually quite low in my 12:02  
6 opinion as to whether there is a clear link between the  
7 conduct of a member and the actual causing of the death  
8 or serious harm. So yes, the serious harm is very  
9 clearly defined but the "may" allows for a degree of  
10 judgement, a causal link between the conduct and the 12:03  
11 harm.

12 405 Q. And you say yourself it sets the threshold quite low in  
13 relation to it. If a guard believes -- Commissioner  
14 believes the conduct of a member may have caused death  
15 or serious harm, they don't need to prove or have 12:03  
16 certain knowledge in relation to either fact, that the  
17 causal factor was the member, the actions of the member  
18 or that the harm itself is in fact serious harm, they  
19 go, once they believe that it may have caused it?

20 A. Chair, at the time of the referral there's no such 12:03  
21 burden of proof on the person referring the matter to  
22 prove, as you say, the conduct has caused the death or  
23 serious harm. It's a very low threshold.

24 406 Q. But you were satisfied at the time of the referral that  
25 psychological harm didn't come within the meaning of 12:03  
26 either section 91 or section 102?

27 A. 102 certainly, I would be satisfied then and I am  
28 satisfied now that psychological harm would not be  
29 covered by the definition in the Act.

1 407 Q. Okay. I think you note in your notes of the call that  
2 you had, and it's at 1609, you made a special point, I  
3 think it's your asterisks is beside it, and this is a  
4 matter which has arisen on a number of occasions  
5 dealing with a number of witnesses, you made clear to 12:04  
6 Superintendent McGovern that despite any complaint or  
7 referral made to GSOC, there is a word that I am  
8 missing, "Despite any complaint or referral --" what is  
9 the next word?  
10 A. Being. 12:05  
11 408 Q. "-- being made to GSOC, the protection of life and  
12 property is entirely a matter for An Garda Síochána."  
13 A. That is what I have written down, yes.  
14 409 Q. You don't have powers to do any of that. You can  
15 investigate events that have occurred; you don't have 12:05  
16 any crime prevention function as such, isn't that  
17 correct?  
18 A. That's correct, we deal with matters that have taken  
19 place rather than what might take place at some point  
20 in the future. 12:05  
21 410 Q. Yes. You go on then and you say that:  
22  
23 "Superintendent McGovern confirmed that he understood  
24 this and that he was making a section 102 referral due  
25 to psychological harm." 12:05  
26  
27 And it is your evidence that you pointed out to him on  
28 the phone on that occasion that you didn't believe it  
29 was a matter which required referral under section 102?



1 A. I don't think I said that.

2 411 Q. Okay.

3 A. AS I have already said in evidence, it's not for me to  
4 query whether or not a referral is made. If it's made,  
5 it's made. It is incumbent upon me to log the 12:06  
6 rationale that I am given at the time, whether or not  
7 it's clear, and in this case it wasn't entirely clear  
8 to me what was being referred exactly and that is why I  
9 have made a note of it and that is why I have  
10 highlighted it in my book with asterisks. 12:06

11 412 Q. You -- and if we go to 1612, because this is where you  
12 deal with the action taken by you. Yes, this  
13 paragraph, "Action taken by GSOC SIO".

14 A. Yes.

15 413 Q. And this is dated 9th October. 12:06

16 A. Yes.

17 414 Q. So this is the fast response. This is your -- you  
18 have either gone back into the office or, yet again,  
19 you are doing this on remote working --

20 A. Yes. 12:07

21 415 Q. -- that day.

22

23 "It is clear from the available information that the  
24 matter should have been notified to GSOC pursuant to  
25 section 85 of the Act on their receipt of the complaint 12:07  
26 from Ms. Simms."

27

28 Now, just in relation to that, the evidence is that  
29 nobody ever mentioned GSOC or a complaint to GSOC, to

1 Ms. Simms. Ms. Simms never mentioned a complaint to  
2 GSOC and no member of An Garda who took the statement  
3 from her said that she ever was -- the issue of GSOC  
4 was raised with her. So while you come to the  
5 suggestion that there was a complaint received from 12:07  
6 Ms. Simms, in fact there never was a complaint made  
7 vis-á-vis GSOC from Ms. Simms. But I take it you were  
8 just assuming at that stage that it was a complaint  
9 made under section 83?

10 A. No, I don't agree with anything you have just said. An 12:07  
11 Garda Síochána were in receipt of a statement of  
12 complaint containing allegations, serious allegations  
13 against a Garda member, and I think they also had a  
14 witness statement from an individual with similar  
15 matters contained within. They had a complaint against 12:08  
16 a Garda member, and it was my view, and the view of  
17 others within GSOC at that time, that that matter  
18 should have been referred to GSOC under 85 in that they  
19 were in receipt of a complaint against a serving member  
20 of An Garda Síochána. 12:08

21 416 Q. You accept that the Garda Act, and you said yourself  
22 it's a highly technical piece of legislation?

23 A. Yes, I do.

24 417 Q. And that, in that regard, a complaint is a matter which  
25 is dealt with under Section 83, as to how a complaint 12:08  
26 can be made, and in -- within the meaning of Part 4 of  
27 the Act, that a complaint has the meaning that arises  
28 from section -- Part 4 of the Act and, in particular,  
29 from section 83. So a complaint within the meaning of

1 the Act is one which commences under section 83, isn't  
2 that correct?

3 A. May I refer to section 83?

4 418 Q. Yes, absolutely.

5 A. I have a copy here. Yes, section 83 deals with how 12:09  
6 complaints are made by members of the public and  
7 outlines a number of scenarios through which those  
8 complaints may be received, either to An Garda Síochána  
9 or directly to GSOC.

10 419 Q. Yes. And then section 85 deals with how it's 12:09  
11 forwarded?

12 A. The transmission of that complaint to GSOC.

13 420 Q. Yes. Section 87 then deals with admissibility of a  
14 complaint, isn't that right?

15 A. Yes, it does, yes. 12:10

16 421 Q. And that includes that the complaint is made by  
17 somebody who is authorised to make it?

18 A. Yes.

19 422 Q. And time limits?

20 A. Yes. 12:10

21 423 Q. And then it has to be -- it ought ordinarily, unless it  
22 deals with matters which could bring An Garda Síochána  
23 into disrepute, it should refer to a garda carrying out  
24 their role as a member of An Garda Síochána, not their  
25 private life, unless that would be of such seriousness 12:10  
26 that it would bring An Garda Síochána into disrepute?

27 A. That's correct, yes.

28 424 Q. But the situation is, is that a person has to want to  
29 make a complaint to GSOC, isn't that correct?

1 A. Well, 83 talks about making a complaint against a  
2 member of the Garda Síochána that is alleged to  
3 constitute misbehaviour may be made to the Ombudsman  
4 commission, but it goes on to say --

5 425 Q. Well, it may also be made to the Garda Commissioner for 12:11  
6 forwarding to the Ombudsman Commission?

7 A. Thank you, yes.

8 426 Q. But the point is that, somebody making a complaint  
9 under Part 4, you don't deal with complaints where  
10 people -- the guards randomly send things in, without 12:11  
11 seeing whether or not the person who has made the  
12 complaint wants you to look into it?

13 A. We deal with referrals under 85 where sometimes it's  
14 not entirely clear at all where the person providing  
15 the information wishes GSOC to deal with it or not. 12:11

16 427 Q. Exactly.

17 A. And that is why we go back to them as a matter of  
18 course and confirm and satisfy ourselves that they are  
19 content for matters to be dealt with by us.

20 428 Q. And if they don't wish -- and because of the, shall we 12:12  
21 say, the space between what is officially a complaint  
22 under section 83, as in somebody wishes to make it or  
23 whether -- to GSOC or not, you check and you confirm  
24 with the person that they did, in fact, want a  
25 complaint to be made to GSOC, and, if they do, you 12:12  
26 proceed forward, and, other than that, you don't  
27 proceed with the matter, isn't that correct?

28 A. Not entirely correct, Chair, no. That would be the  
29 normal course, certainly. There are other avenues

1 available to the Commission, and I am specifically  
2 referencing section 102(4), which allows for the  
3 Commission to launch an investigation of their own  
4 volition in the absence of a complaint where they  
5 consider matters are sufficiently serious to have a  
6 public interest element attached to them. 12:12

7 CHAIRMAN: Sorry, can I just clarify on this,  
8 Mr. Harty. I agree it may be important. Let's suppose  
9 you have a situation where a member of the Garda

10 Síochána has interacted with a member of the public who 12:13  
11 has, for instance, paid over money in relation to a  
12 fine but has pocketed the money and, in consequence of  
13 that, the person receives a notification saying, your  
14 fine for whatever it is has not been paid. Now, leave  
15 aside the fact that I don't think Gardaí ever accept 12:13  
16 money, but just leave that aside for the moment. And  
17 the person goes into a Garda station and says, I want  
18 to complain about that, I want the Gardaí to  
19 investigate it and I don't want it to go anywhere near  
20 GSOC. Do you see the example I am giving you? 12:13

21 A. Yes.

22 CHAIRMAN: Yes. Are the Gardaí still obliged to refer  
23 that matter to GSOC because it is misconduct by a garda  
24 as a garda?

25 A. No, they can deal with that themselves. If such 12:13  
26 information came to our notice in some way or other,  
27 then we still have the authority to launch an  
28 investigation of our own volition under 102(4) if we  
29 wish.

1 CHAIRMAN: So that they could keep it internally?

2 A. Yes, and indeed they do, Chair, yes.

3 429 Q. MR. HARTY: That is the situation, which is that if a  
4 person wishes to make a complaint under Part 4 of the  
5 Act, it must be forwarded to you. If there is a clear 12:14  
6 and unambiguous situation in relation to it, somebody  
7 says 'I want to make a complaint about a garda', they  
8 should then be referred to, is this a complaint? Do  
9 you want it to be dealt with by GSOC? Here is the  
10 form, fill it out, or, I will take it down now, I don't 12:14  
11 have a form, and I will forward it under section 85.

12 A. Yes.

13 430 Q. In relation to other matters, there is no requirement  
14 for the Garda Commissioner, where it comes to light  
15 that a complaint has been made such as that example of 12:14  
16 improper conduct by a garda, there is no requirement in  
17 such circumstances for the Commissioner to forward it  
18 on. It's only section 102 where there is a mandatory  
19 requirement for the Commissioner to bring matters to  
20 the attention, if somebody doesn't wish to make a 12:14  
21 complaint to GSOC?

22 A. I would --

23 431 Q. Sorry, to be clear, and I got lost. If somebody comes  
24 to a sergeant in a Garda station saying, I want to  
25 complain about that guard, I want you to deal with it 12:15  
26 internally, I don't want to make any more fuss about  
27 it, there is no requirement for the Garda Síochána to  
28 forward that to you as a matter of law, is there?

29 A. No, I would accept there is no requirement. I would

1 say in cases where, and I can think of a couple of  
2 examples recently, in cases where the matters coming to  
3 notice are of such public import, that they would have  
4 a duty to make us aware of that. If you are asking me  
5 to point to the section of the Act where it says that, 12:15  
6 I couldn't very readily, but if there is a  
7 public-interest concern, matters of high profile or  
8 gravity, then certainly I would expect information  
9 around that so that we can then base a decision on  
10 whether or not to launch a 102(4). 12:16

11 432 Q. Yes. In relation to section 102, on the other hand, it  
12 is mandatory?

13 A. Yes.

14 433 Q. If they believe a member of An Garda Síochána may have  
15 caused death or serious harm through his actions, 12:16  
16 either on duty or off duty, they must refer it so as to  
17 ensure, in those circumstances, that there is a  
18 completely independent investigation?

19 A. That's correct, Chair, yes.

20 434 Q. You received and you noted on the 9th of October: 12:16

21  
22 "The superintendent said it was due to the  
23 psychological-harm element of the incident. The chief  
24 superintendent has stated that the referral was made as  
25 they believed there is a chance that Harrison might 12:16  
26 other -- cause death or serious harm to Simms at some  
27 point in the future."

28  
29 where did you get that from?

1 A. I have been going through my notes to try and recall  
2 where I got that from. I can't recall whether it was a  
3 phone call or an email or some other communication, but  
4 it came to my notice at some stage, quite an early  
5 stage, by the looks of it, that there was a difference 12:17  
6 of opinion, if I can put it that way, as to the reason  
7 the matter was being referred under 102. The  
8 superintendent, and I have noted this in my log so it  
9 must have come into play on the 8th or 9th, and it may  
10 even have been when the statements were forwarded to me 12:17  
11 at my request of Marisa Simms and Rita McDermott, that  
12 a different, seemingly different rationale was being  
13 given as to the reasons for the referral, with one  
14 being psychological harm, and that was at the time of  
15 the referral. 12:17

16 435 Q. Mm-hmm.

17 A. And then, later, the chance that something may happen  
18 in the future of significance. So both were being put  
19 into the mix, as it were. I should say for clarity,  
20 Chair, and you may have covered this already - if you 12:18  
21 have, I apologise - in evidence, but the responsibility  
22 to refer a matter under 102 of the Act rests with the  
23 Garda Commissioner, and he or she then delegates that  
24 authority, and there is a written delegation of that  
25 authority to -- they have chosen the level of 12:18  
26 superintendent. It's very important that the Tribunal  
27 understands that that is superintendent and  
28 superintendent alone. That does not include chief  
29 superintendents, it does not include acting



1           superintendents or acting district officers. It is  
2           superintendents. And I make the point because what was  
3           important to me is the rationale given by the  
4           superintendent, not what came in subsequent to that.  
5           So the superintendent makes the referral, regardless of 12:19  
6           the views of anybody else. And the views of the  
7           superintendent at the time of making the referral, I  
8           have noted down as being due to psychological harm to  
9           Marisa Simms.

10 436 Q.    Sorry, and I wasn't aware, and that is very helpful to 12:19  
11           know, that chief superintendents have not been  
12           delegated the function of section 102 referrals.

13           A.    No, they have not.

14 437 Q.    I had assumed when I was told it was a delegated  
15           function that it was -- 12:19

16           A.    Supers and above.

17 438 Q.    Superintendents and above.

18           A.    And so would I. But the matter has arisen in various  
19           trials where the, and this is what I referred to  
20           earlier, on being put on full proofs for trials and the 12:19  
21           technical and complex nature of navigating the Act.  
22           The validity of the written delegated authority by the  
23           Garda Commissioner has been called into question at  
24           criminal trials that we have been involved in and that  
25           is where the clarity has arisen around the delegation, 12:19  
26           only extends to superintendents. In fact, when  
27           superintendents are off division for some reason,  
28           sickness, holiday, whatever it might be, and an acting  
29           district officer is appointed, which is an inspector

1 acting up one rank in the role of a superintendent for  
2 the duration of that vacancy, that if they make a  
3 referral, the first thing we ask them to do is get a  
4 superintendent to ring us, because otherwise the  
5 referral is not sound. 12:20

6 439 Q. It doesn't exist?  
7 A. Yes.

8 440 Q. That is -- it perhaps explains why Superintendent  
9 McGovern in this instance was -- sorry, it does explain  
10 why he was tasked with doing the referral by Chief 12:20  
11 Superintendent -- in consultation with Chief  
12 Superintendent McGinn?  
13 A. That would seem to be the case, yes.

14 441 Q. There, in fact, was no alternative person?  
15 A. No, other than another superintendent, yes. 12:20

16 442 Q. Yes. You then forwarded the matter effectively to  
17 Mr. Doherty to see whether or not Ms. Simms wished to  
18 proceed with this, isn't that correct?  
19 A. Mr. O'Doherty, that's right.

20 443 Q. Mr. O'Doherty. 12:21  
21 A. I am not being pedantic, but there is a Mr. Doherty  
22 also on the form, so just to distinguish between the  
23 two. Yes.

24 444 Q. And he rang her and she confirmed that she hadn't --  
25 didn't wish for GSOC to investigate the matter? 12:21  
26 A. Yes, and she later confirmed that in writing via email.

27 445 Q. In relation to your experience of section 102s, can you  
28 just tell me, in terms of commonness, how common are  
29 section 102 referrals invoking psychological harm?

1 A. Very uncommon. In fact, I don't think -- I have been  
2 with GSOC since before it opened its doors in 2007, I  
3 helped set the organisation up, I wrote many of the  
4 policies that we currently adhere to, and I have  
5 taken -- I was trying to think about this before today, 12:22  
6 how many 102s over the last 10 years. It has to exceed  
7 100, I would think, particularly in the early years  
8 when many, many 102s were being made, many more than  
9 there are now. I can't recall a situation where I have  
10 ever taken a 102 referral for psychological harm. It's 12:22  
11 always physical harm. And there are certainly  
12 instances where the level of harm, in my view, would  
13 not constitute what you might consider serious or in  
14 terms of the definition of harm provided for in the  
15 Act, but, that aside, I have never experienced a 12:22  
16 referral, that I can recall anyway, around  
17 psychological harm.

18 446 Q. Yes. And in relation to section 102 referrals for harm  
19 sometime in the future, a potential threat to kill and  
20 that being carried out in the future, how many section 12:22  
21 102 referrals have you had of that nature?

22 A. None, Chair. And, in fact, I think that may have been  
23 part of the reason certainly where I have emphasised in  
24 my notes the understanding of Superintendent McGovern  
25 and the conversation we had. I wanted to be absolutely 12:23  
26 clear that the protection of life and property is not a  
27 matter for GSOC, it's a matter for An Garda Síochána,  
28 and I have written that down and I have written down  
29 that he confirmed he understood this, and I have

1 highlighted that with two asterisks in my daybook.

2 447 Q. Finally, just in relation to one or two points. In  
3 relation to the -- what the Gardaí can or cannot do  
4 once a GSOC investigation is started, I think you would  
5 be familiar with section 105 of the Act, this is the 12:23  
6 power for prosecutions to still continue with the  
7 consent of the DPP, even if a GSOC referral has taken  
8 place?

9 A. Yes, I had to remind myself of it because it's not  
10 something that has arisen very frequently, but I am 12:24  
11 familiar with 105, yes.

12 448 Q. But there is nothing in the Garda Act to stop the  
13 Gardaí from continuing whatever they need to do while  
14 GSOC were doing what GSOC need to do?

15 A. No, there is nothing that prevents them from doing 12:24  
16 that, and further, there is a positive obligation  
17 placed upon them in 89 for the securing and preserving  
18 of evidence. So the principle in practice is that  
19 simply because a matter has been referred to GSOC, you  
20 don't then just stand back and do nothing. There are 12:24  
21 steps to be taken and we would expect those steps to be  
22 taken.

23 MR. HARTY: Okay. Thank you very much.

24 A. Thank you.

25 CHAIRMAN: Is there any other questions? 12:24  
26 MR. BARNES: No questions.

27 MR. DIGNAM: I just have a few questions, Chairman.

28

29 MR. WRIGHT WAS CROSS-EXAMINED BY MR. DIGNAM:

1 449 Q. MR. DIGNAM: Mr. Wright, I appear on behalf of An Garda  
2 Síochána and I just wanted to ask you a few questions.  
3 A. Good afternoon.  
4 450 Q. You said in your evidence that you get -- and my  
5 understanding of how things are structured in GSOC is 12:25  
6 that you deal with section 102 referrals, or at least  
7 you did at that time deal with section 102 referrals.  
8 Section 85 notifications or referrals come in, I think,  
9 to the office and they are dealt with by caseworkers, I  
10 think is how it was explained by Mr. Groenewald. Is 12:25  
11 that correct?  
12 A. It is correct, but I would emphasise just for absolute  
13 clarity that in those 85 matters that are -- where some  
14 fast-track or urgent action is required, there would be  
15 very close communication between the two units, with 12:25  
16 the matter being rendered admissible and then  
17 investigative steps taken very shortly thereafter.  
18 451 Q. Of course. And you said in your evidence that you have  
19 received, I think the phrase you used was a wide range  
20 of referrals, and you then, later in your evidence, 12:25  
21 said that you have received erroneous referrals. Do I  
22 take it you are talking about section 102 -- erroneous  
23 section 102 referrals?  
24 A. Yes, what appeared to me to be erroneous as in not  
25 meeting the definition of serious harm. But I repeat 12:26  
26 what I said earlier on many times in my evidence, that  
27 it's not for me to question that. If the referral is  
28 made, it's made, that is it, I have to deal with it.  
29 452 Q. And I think in fairness to you, Mr. Wright, the phrase

1 you used was that there has to be clear blue water  
2 between the role of An Garda Síochána in making the  
3 referral and your statutory role in deciding whether it  
4 was a referral that you should deal with as a matter  
5 under section 102 or not, and that is a matter entirely 12:26  
6 within your discretion and your judgement, isn't that  
7 right?

8 A. No, that is not right. If the referral is made, I have  
9 to deal with it under 102. There can be no decision as  
10 to whether or not -- and I would like to be very clear 12:26  
11 on this. I have said earlier on that I have read  
12 evidence where there seemed to be some notion creeping  
13 in that we can pick and choose here or we can accept or  
14 decline or refuse. That has never arisen and can never  
15 arise. We have to deal with it when it's referred. 12:26

16 453 Q. Sorry, Mr. Wright, what I meant -- sorry, that was  
17 looseness in my language and I apologise for that.  
18 What I meant was that you decide whether it is a  
19 correct -- whether it is a matter which discloses the  
20 serious risk or the necessary ingredients of a section 12:27  
21 102 referral, is that right?

22 A. That is not right, no. All we decide is what  
23 mechanism, we will then pursue the matter, and there  
24 are three options available to me for investigation or  
25 discontinuance. So if the referral is made, it's made. 12:27  
26 I don't decide whether it's good, bad or indifferent,  
27 but I do log and record the reasons I am given, lest I  
28 be asked about that at some future date by a court.

29 454 Q. And if you are satisfied that the necessary ingredients

1 aren't met, you don't carry out any further  
2 investigation, is that right?

3 A. That is not right, either, no, no.

4 455 Q. I may be misunderstanding you. Sorry.

5 A. You are. The referral is made. The ingredients may or 12:27  
6 may not have been met, but the referral is made, the  
7 decision to refer is made. I then have to conduct  
8 either an investigation under Section 98, which is  
9 commonly referred to as a criminal investigation; an  
10 investigation under Section 95, which is an 12:28  
11 investigation that does not involve matters that appear  
12 to involve offences, i.e. non-criminal; or I can  
13 discontinue the matter under 93, in that further  
14 investigation is not necessary or reasonably  
15 practicable. I make no judgement around the virtues, 12:28  
16 or otherwise, of the 102 referral, other than log the  
17 reason I am given.

18 456 Q. And what did do you in this case?

19 A. I logged the reasons I was given.

20 457 Q. And, in conclusion, how did you conclude the matter? 12:28

21 A. The 102 aspect of this was concluded under 93. It  
22 never got out of 91. It remained in 91 where it was  
23 discontinued as further investigation not necessary or  
24 reasonably practicable. The complaint matter was  
25 processed in the usual way, and that is the evidence I 12:28  
26 have put in my statement here, that Ms. Simms was  
27 contacted around admissibility and those sort of  
28 things, and that was processed in the usual way.

29 458 Q. Sorry. Now, in relation then to, was it -- when this

1 comes in to you, when this is referred to you, it's on  
2 foot of a statement of complaint, as you know, made by  
3 Ms. Simms. Was it likely that you were going to  
4 discuss this matter with Ms. Simms, in any event?  
5 A. In any event? 12:29  
6 459 Q. Sorry, this matter has come in to you, you have to  
7 accept it, you have been very clear in your evidence --  
8 A. The 102?  
9 460 Q. The 102 referral, yes, you have to accept the 102  
10 referral. That is on foot of a statement of complaint 12:29  
11 from Ms. Simms?  
12 A. Mm-hmm.  
13 461 Q. So Ms. Simms is the alleged injured party or the  
14 complainant. Is it likely that you are going to speak  
15 to Ms. Simms before bringing this matter to a 12:29  
16 conclusion?  
17 A. Someone in the office was going to speak to Ms. Simms,  
18 and in fact that is what happened, she was spoken to  
19 and she confirmed she didn't wish to proceed.  
20 462 Q. Yes. It has been suggested that one of the reasons why 12:30  
21 section 102 was used by An Garda Síochána in this case  
22 was to circumvent the need to even tell Ms. Simms that  
23 this was being sent to GSOC, but it was -- if there was  
24 a malicious motivation behind that, I have to suggest  
25 that it was an ineffective one, because it was always 12:30  
26 something which was going to be told to Ms. Simms, that  
27 a referral had been made. Do you feel able to comment  
28 on that?  
29 A. All I can comment is, there is no provision in 102 to



1 use it to circumvent anything else. 102 is very clear  
2 about the circumstances in which a referral can be  
3 made. I have outlined what they are, and quite -- what  
4 other way 102 may be used to circumvent things, I  
5 couldn't comment on that.

12:30

6 463 Q. Yes. Now, in relation then to, as I understood -- as I  
7 understood your evidence, Mr. Wright, this -- your view  
8 is that the matters contained in the statement of  
9 complaint were matters which should be brought to the  
10 attention of GSOC, and I think you expressed the view  
11 in your evidence, and indeed in the log that we have  
12 seen, that it should have been done under section 85  
13 rather than 102. But do I take it from that that you  
14 are satisfied that this is a matter which should have  
15 been brought to the attention of -- these are matters  
16 which should have been brought to the attention of  
17 GSOC?

12:31

12:31

18 A. Yes, I think the matters contained within the statement  
19 of complaint were serious, that these were matters that  
20 I would expect to be brought to our attention, just not  
21 in the mechanism that they were, that's all, and, in  
22 fact, that wasn't just my opinion, that was also the  
23 opinion of the acting deputy director at the time we  
24 discussed it. I have noted down here the contents of  
25 that discussion. And I have also discussed that with  
26 George O'Doherty at the time.

12:31

12:32

27 464 Q. Yes. And I think Mr. O'Doherty gave that evidence and  
28 expressed that opinion also when he gave evidence to  
29 the Tribunal.

1 A. Yes.

2 465 Q. Just in relation, finally, Mr. Wright, you were asked  
3 about section 83 and 85, and it was put to you that not  
4 all matters need -- not all matters of misconduct or  
5 allegations of misconduct against members of An Garda 12:32  
6 Síochána have to be put to the -- are to be sent to  
7 GSOC. I am not sure whether you are familiar with  
8 Directive 50/13, I think that is the one that was  
9 mentioned earlier on in your examination, so if I could  
10 just ask you to turn to that, page 2495. You will see 12:32  
11 section 85 is mentioned about halfway down the page,  
12 and then there is a paragraph referring to the Garda  
13 Síochána Act and then a paragraph beginning "All  
14 complaints made by a member of the public". Now,  
15 whether that is correct or incorrect, that is the 12:33  
16 directive that is -- on foot of which -- or which was  
17 known to Superintendent McGovern and indeed Chief  
18 Superintendent McGinn, and it says:  
19  
20 "All complaints made by a member of the public 12:33  
21 concerning the conduct of a member of An Garda Síochána  
22 will immediately be forwarded in writing to the Garda  
23 Síochána Ombudsman Commission with a copy submitted to  
24 Chief Superintendent Internal Affairs complaints."  
25 12:33  
26 So that is the directive that was -- that has been  
27 given to members of An Garda Síochána. And you are  
28 satisfied that this is a complaint by a member of the  
29 public in relation to members -- sorry, by a member of

1 the public in relation to misconduct or the conduct of  
2 a member of An Garda Síochána?

3 A. That was very clear to me from the contents of the  
4 statement, that it was a complaint, serious allegations  
5 being made against a serving member of An Garda  
6 Síochána. 12:33

7 MR. DIGNAM: Thank you, Mr. Wright.

8  
9 THE WITNESS WAS RE-EXAMINED BY MR. MCGUINNESS:

10  
11 466 Q. MR. MCGUINNESS: Mr. Wright, just two further 12:34  
12 questions. I think that view that you have expressed  
13 to Mr. Dignam, that was the view you had on the date  
14 that you got the referral, and could you please confirm  
15 that by looking at page 2323. And I think this 12:34  
16 represents the email that Chief Superintendent McGinn  
17 sent to you following the referral on the 8th October,  
18 she forwarded the draft typed version of the statements  
19 there.

20 A. Just one moment. 12:34

21 467 Q. And I think that was directed to you.

22 A. I am struggling to read that on the screen. It's very  
23 faint, but yes.

24 468 Q. It says:

25  
26 "Dear Darren, please find attached statement of 12:34  
27 complaint of Marisa Simms and her mother Rita  
28 McDermott. The statements are not being proofread.  
29 There are a few words that have yet to be deciphered

1 from the original handwritten statement. Once this has  
2 been attended to, I will forward you the statements in  
3 complete format."

4 A. Yes, that is what it says, yes.

5 469 Q. And then at the top of the page, this seems to record 12:35  
6 that you did characterise it in the way suggested by  
7 Mr. Dignam as a complaint and also as a referral. You  
8 said:

9  
10 "George, can you please register the attached on CMS as 12:35  
11 a complaint. It will also need to be put on as a  
12 section 102 referral and I will send the details of  
13 this on to you tomorrow when I am back in the office."

14  
15 And you saw it in that way as a complaint concerning a 12:35  
16 misbehaviour of a member An Garda Síochána by a member  
17 of the public?

18 A. Yes, we had two, and this wouldn't be uncommon either,  
19 we had two avenues into the office, if you like, on  
20 this: we had the referral itself and we were now in 12:35  
21 receipt of a statement of complaint and a witness  
22 statement.

23 470 Q. Yes. And then at page 2346, this was Mr. O'Doherty's  
24 note which he gave evidence about, but it relates to a  
25 note which is dated the 11th, but at the first 12:36  
26 paragraph it says:

27  
28 "Following discussion with Darren Wright, SIO, and Ray  
29 Leonard, Acting Director of Operations, concerning the

1 case, I contacted Ms. Marisa Simms by telephone on  
2 Wednesday 9th October 2013."

3  
4 And were you aware of Mr. O'Doherty's intention to do  
5 that then, as a result of your discussion with him? 12:36

6 A. Yeah, I would say I was, and I would say probably  
7 further: I probably would have asked him to do that or  
8 we would have agreed a course of action, in receipt of  
9 a complaint, that she should be contacted and asked how  
10 she wished to proceed. 12:36

11 471 Q. Yes. And then going to the bottom of page 1615, your  
12 conclusion in your report, there are two paragraphs at  
13 the bottom of page 1615. And this addresses, it seems,  
14 both issues, whether there was sufficient or any  
15 serious harm within it to be regarded as a section 102 12:37  
16 referral, and then how it was dealt with as a statement  
17 of complaint from a member of the public in relation to  
18 behaviour of a garda?

19 A. Yes.

20 472 Q. Dependent upon the consent of Marisa Simms, isn't that 12:37  
21 right?

22 A. That's right, yes.

23 473 Q. And she wouldn't consent or didn't consent to it being  
24 dealt with by GSOC?

25 A. She, I believe, said that both in a phone conversation 12:37  
26 and then later confirmed in writing by email to  
27 Mr. O'Doherty.

28 474 Q. Yes. So though although this avenue of having an  
29 independent statutory investigation into her complaint,

1 she chose not to consent to that course of action?

2 A. She chose not to consent to that course of action,  
3 Chair, yes.

4 MR. MCGUINNESS: Okay. Thank you.

5

12:37

6 MR. WRIGHT WAS QUESTIONED BY THE CHAIRMAN:

7 475 Q. CHAIRMAN: I have just two things. And we have been, I  
8 suppose, around the trees in relation to the  
9 interpretation of this Act, but just to try and get a  
10 few things clear in my head. You have no power, when a 12:38  
11 complaint comes in, to say no, we are not receiving  
12 that?

13 A. No power not to receive something, no. We don't, no.

14 476 Q. CHAIRMAN: No. But it could be that something comes  
15 in, for instance, and it's about a retired garda, in 12:38  
16 which case it's none of your business, and you  
17 presumably tell people that?

18 A. If the person complained of was a serving member at the  
19 time of the alleged conduct, then that is our business.

20 477 Q. CHAIRMAN: well, I mean something that the person had 12:38  
21 done after they retired?

22 A. No, that is none of our business.

23 478 Q. CHAIRMAN: And under those circumstances do you have to  
24 go to Section 93 and determine it or do you look into  
25 it or do you just write to the person and say, look, 12:38  
26 this is nothing to do with GSOC?

27 A. No, it would be deemed as an inadmissible complaint in  
28 that it didn't meet the criteria of 87, I think, Chair,  
29 without consulting the Act here, but there is a list of

1 criteria and it wouldn't meet at least one of those,  
2 the circumstances you have described, so it wouldn't be  
3 discontinued in 93, it would never progress as an  
4 admissible complaint, it would never be admitted.

5 479 Q. CHAIRMAN: If a complaint is made and it's sent in 12:39  
6 under the wrong rubric, in other words the wrong  
7 heading, it comes in under 85 and it's really 102 or it  
8 comes in under 102 and it's really 85, do you have any  
9 power to say, oh, you have got the wrong section, we  
10 are not dealing with this? 12:39

11 A. It places us in a difficult position if it's referred  
12 incorrectly. It does not prevent us from launching a  
13 102(4) of our own volition in the public interest on  
14 the circumstances reported. So it causes difficulties.  
15 I wouldn't say it's a simple case of we can refuse to 12:40  
16 accept or turn it down, or whatever. We would wish for  
17 the statutory footing on which any subsequent  
18 investigation was launched to be sound right from the  
19 very beginning.

20 480 Q. CHAIRMAN: Sure. No, I understand that, and you may 12:40  
21 have trouble at criminal trials, or whatever, in the  
22 event that you get to that position. But if I am  
23 construing what you are saying correctly, and I am just  
24 having difficulty understanding the ins and outs of  
25 this, once, in any way, you get a complaint from a 12:40  
26 member of the public about the conduct of a Garda  
27 Síochána as a garda, you have to deal with it?

28 A. We have to take an admissibility decision, firstly, as  
29 to whether or not it satisfies the criteria under the

1 Act as being a complaint and then we proceed from  
2 there.

3 481 Q. CHAIRMAN: All right. So if it comes in under section  
4 102 and it's not section 102, what your understanding  
5 is, you then deal with it under section 85 by  
6 contacting the complainant and saying, is this  
7 something you want us to proceed with?

12:41

8 A. No, not if a complaint has not been made. We may  
9 instead look at 102(4), if the 102(1) referral is  
10 unsound for any reason or incorrect, then -- and it  
11 should have been 85, we may look at 102(4), for  
12 example, as --

12:41

13 482 Q. CHAIRMAN: You could do that, I suppose. But let's  
14 just take this case and because it's the best thing to  
15 do. A complaint comes in under section 102 but it does  
16 say all of this serious stuff happened, this person is  
17 a garda, but, as you say, psychological harm isn't --  
18 doesn't appear to be there under the section, so then  
19 do you treat it as a section 85 and contact the person  
20 concerned, is that what is going to happen?

12:41

12:41

21 A. I am not following you, Chair, I am afraid. A  
22 complaint would not come in under 102. A 102 is a  
23 referral and so it would be --

24 483 Q. CHAIRMAN: Well, I know, I appreciate it's a referral.  
25 But at the end of the day, what is actually written on  
26 the document, if you look at Marisa Simms' statement,  
27 is, "I am complaining about Keith Harrison and he did  
28 the following". Now, leave aside any question as to  
29 whether that was a genuine statement or not, it is a

12:42



1 complaint, isn't it?

2 A. It is, absolutely, yes.

3 484 Q. CHAIRMAN: But it came in as a referral. So having  
4 come in as a referral, do you rule it out as  
5 inadmissible as a complaint or do you deal with it as a 12:42  
6 complaint?

7 A. No, we would deal with it as a complaint, yes.

8 485 Q. CHAIRMAN: That is fine. Thanks. That clarifies that.  
9 And I know people have made attempts to clarify that  
10 for me before. It's my fault for not understanding it. 12:42  
11 Now, the second thing that I wanted to understand was  
12 this: You possibly have followed the transcript to  
13 some degree?

14 A. Some of them, Chair, yes.

15 486 Q. CHAIRMAN: And you will recall it has been put that 12:42  
16 you, apparently, are the person who is said to have  
17 rung back Superintendent McGovern. Now, did you ring  
18 back Superintendent McGovern? Was there one phone call  
19 or was there two phone calls?

20 A. Yes, I did, and we always would. The mechanism for 12:43  
21 referral is that the superintendents who are referring  
22 matters don't call us directly, they call their own  
23 Command and Control in the DMR, the Dublin Metropolitan  
24 Region, the Command and Control centre. They are the  
25 people who have the phone number for the on-call phone, 12:43  
26 and in this instance it was Ray Keogh. I have recorded  
27 that. The person from DMR who is notifying us of the  
28 referral would give us very, very basic details known  
29 to them, along with the mobile phone number of the

1 superintendent referring the matter, who is essentially  
2 requesting a call-back. We would take those notes and  
3 then call back the superintendent to get further  
4 details and decide how we are then going to respond.  
5 So there were two calls, if you like -- 12:43

6 CHAIRMAN: I do understand. So the interval between  
7 the two is possibly 10 minutes?

8 A. Or less, yes.

9 487 Q. CHAIRMAN: So how quick was this? Because it's been  
10 said to be 10 minutes, it's been said to be 20 minutes. 12:44  
11 I am not sure it matters, but --

12 A. This was 10 minutes. So I have it recorded the call  
13 was received by DMR by me at 12:35 and I called  
14 Superintendent McGovern back at 12:45. That may be  
15 rounded up by one minute, but it was ten minutes. 12:44

16 488 Q. CHAIRMAN: Thank you. This may be capable of a yes or  
17 no answer but if you need to qualify it please do, but  
18 did you, on phoning him, say, this is not a section 102  
19 referral?

20 A. I don't recall saying that. It's not something that I 12:44  
21 would say, Chair, no. I may have queried what exactly  
22 is being referred here.

23 489 Q. CHAIRMAN: And you had a discussion about psychological  
24 harm?

25 A. Certainly we did, and that is what I have noted down. 12:44

26 490 Q. CHAIRMAN: But did you say to him, look, you can't do  
27 this?

28 A. I don't think so, no.

29 491 Q. CHAIRMAN: Would you have done that? Is that your

1 style?

2 A. No, it's not my style, Chair, no.

3 492 Q. CHAIRMAN: You would have just seen the documentation  
4 and examined it further, is that it?

5 A. Yes.

12:45

6 493 Q. CHAIRMAN: Is that your way of working?

7 A. Yes, I have taken in excess of 100 102 referrals over  
8 the last 10 years, I would estimate, and I have never  
9 said to a superintendent, that I can recall, this is  
10 not a 102 referral. I am very clear there is no  
11 decision to be made by me around whether or not I  
12 accept this. It's accepted the referral is made, and  
13 that has always been our position.

12:45

14 CHAIRMAN: All right. Thanks for your help,  
15 Mr. Wright.

12:45

16

17 THE WITNESS THEN WITHDREW

18

19 CHAIRMAN: It's now after quarter to, so let's break  
20 for an hour. Thank you.

12:45

21

22 THE HEARING ADJOURNED FOR LUNCH

23

24

25

26

27

28

29

1 THE HEARING RESUMED, AS FOLLOWS, AFTER LUNCH:

2  
3 MR. MARRINAN: Sergeant Paul Wallace, please. This is  
4 at page 1065 of the materials.

5  
6 SERGEANT PAUL WALLACE, HAVING BEEN SWORN, WAS DIRECTLY  
7 EXAMINED BY MR. MARRINAN:

8 494 Q. MR. MARRINAN: would you just give a history of your  
9 career in An Garda Síochána to date, please.

10 A. I can, Mr. Chairman. I joined An Garda Síochána in  
11 August 1985, completing training in January 1986, went  
12 to my first station on allocation to Monaghan Town. I  
13 remained there until November 1993, when I was promoted  
14 to the rank of sergeant and I was transferred up to  
15 Glencolmcille, a small coastal village in west Donegal.  
16 I remained there until 1997, and I transferred then as  
17 unit sergeant to Letterkenny Garda station in August  
18 1997. I remained there for about 18 months, and I  
19 transferred out to Carrigans, on the border, as  
20 sergeant in charge. I was there for approximately 18  
21 months, moving back into Letterkenny. And then in 2002  
22 I was appointed to my current role, which is divisional  
23 crime prevention community relations officer for  
24 Donegal, and I have remained there since.

25 495 Q. And I think in that capacity, on the 7th October 2013  
26 at approximately 5:30pm you received a telephone call  
27 from Sergeant Fergus McGroary, is that right?

28 A. That's correct, Chairman.

29 496 Q. I think he's attached to Milford Garda Station?

1 A. That's correct.

2 497 Q. Now, he informed you that a threat had been made on the  
3 life of Garda Keith Harrison, who was then attached to  
4 Donegal Town Garda Station, and that he had called to  
5 Garda Harrison's home in the townland of Drumacadoo in 13:49  
6 Churchill on the 5th October 2013, isn't that right?

7 A. That's correct.

8 498 Q. Now, we know that a statement was taken by Sergeant  
9 McGroary, that is at page 1956. And, sir, I should  
10 indicate at this juncture that I have spoken to 13:50  
11 Mr. Harty and Sergeant McGroary isn't required to give  
12 evidence in relation to his visit on the 5th October  
13 2013. But he alerted you to the fact that he had  
14 called and visited with Garda Harrison, isn't that  
15 right? 13:50

16 A. That's correct.

17 499 Q. Now, he then made a request of you to carry out an  
18 assessment of the existing security arrangements at  
19 Garda Harrison's home in Churchill. What does that  
20 entail? 13:50

21 A. It normally entails making an appointment to meet the  
22 person concerned, then I go out, meet with them and I  
23 conduct a security assessment of the house, look at the  
24 security around it, if there's any there, like  
25 electronic security, lighting, the quality of the 13:51  
26 doors, windows, the location of it, items like that.  
27 It runs along on a checklist, as such.

28 500 Q. Now, I think you also around about the same time  
29 received a telephone from Chief Superintendent McGinn,

1 is that right?

2 A. That's correct.

3 501 Q. And what was she inquiring about?

4 A. Well, she just asked was I aware of the threat against  
5 Garda Harrison, and I said that I was, and she just 13:51  
6 said -- asked me would I -- could I deal with it as a  
7 matter of urgency because it was a member of the force.

8 502 Q. Now, I think that you then went to Churchill, to Garda  
9 Harrison's home, isn't that right?

10 A. That's correct. 13:51

11 503 Q. Now, you prepared a report the following day in  
12 relation to this matter, which was sent to your  
13 superintendent in Milford, and if we could have page  
14 1382 on the screen, please. This report was compiled  
15 as a result of your visit with Garda Harrison and your 13:52  
16 recollection of it, the following day, when you  
17 prepared your report?

18 MR. HARTY: Sorry, sir, the screens appear to be down  
19 on my side of the room. Yes.

20 504 Q. MR. MARRINAN: You also made notes during the course of 13:52  
21 the meeting that I will come to in a moment, all right?

22 A. That's correct.

23 505 Q. We will just bring you through the report that you  
24 made. It's headed "Re Alleged Threat to Kill Garda  
25 Keith Harrison", and then you say that you met by 13:53  
26 appointment with Garda Harrison at his rented home in  
27 Churchill on the evening of the 7th October 2013. Did  
28 you know Garda Harrison prior to this?

29 A. No, I didn't, Chairman.

1 506 Q. Had you ever met him before?  
2 A. I had never met him.  
3 507 Q. Had you heard of him?  
4 A. No.  
5 508 Q. No. Then under "Residence" you describe the residence. 13:53  
6 This is part of your walk through the property with a  
7 view to ascertaining --  
8 A. That's correct.  
9 509 Q. -- any potential security risks that there may be?  
10 A. Risks or deficiencies that would be apparent. 13:53  
11 510 Q. Well, we can skip over that. And you then go on to  
12 deal with the meeting. And you say that Garda Harrison  
13 was alone in the house at the time and appeared quite  
14 agitated and nervous.  
15 A. That's correct. 13:53  
16 511 Q. Is that how you found him to be?  
17 A. Yes.  
18 512 Q. "He informed me that he had been in telephone mobile  
19 contact with his partner, Ms. Melissa Simms, and she  
20 had just informed him that she had been in court in 13:54  
21 Letterkenny earlier seeking a safety order against  
22 him."  
23  
24 Is that what he said to you?  
25 A. Yes, that's correct. 13:54  
26 513 Q. And was that one of the first things that he said to  
27 you?  
28 A. It obviously was, yeah, when I put it in the early part  
29 of the meeting of the report, when describing the

1 meeting, which is normal, which is just the normal  
2 course in the way that you prepare the report.

3 514 Q. He then went on to tell you that she wanted him out of  
4 the house and she had made a statement to the guards  
5 two days ago about his treatment of her. Is that what 13:54  
6 he told you?

7 A. Yeah, that's correct.

8 515 Q. And then in brackets you say:  
9 "(He did not disclose any specific allegations.)"

10 A. That's correct. 13:54

11 516 Q. And then you go on to say:  
12  
13 "During the course of the statement Chief  
14 Superintendent McGinn had spoken to her and advised her  
15 that 'no guard will treat a woman like that, I will see 13:55  
16 to that'."

17  
18 And you have that in quotation marks as having been  
19 said by Melissa - I think it's Marisa Simms - to Garda  
20 Harrison, is that right? 13:55

21 A. Well, Garda Harrison said it to me --

22 517 Q. Yes.

23 A. -- quoting Marisa Simms.

24 518 Q. So I will return to that in a moment and to your note  
25 in relation to that. But is that your recollection, 13:55  
26 when you were doing the report, of what he had said to  
27 you about his conversation --

28 A. Yes.

29 519 Q. -- with his partner?



1 A. Yes, and I noted it down in my handwritten notes.

2 520 Q. You then go on to say:

3

4 "He asked me if I knew if this was true. I replied  
5 that I had no knowledge of this development. I asked  
6 him where and to whom the statement was made."

13:55

7

8 That is a reference to the statement that he had  
9 referred to that had been made by his partner,  
10 Ms. Simms, is that right?

13:56

11 A. Yeah, that's correct, Chairman.

12 521 Q. "He replied that Ms. Simms did not disclose this. I  
13 advised him that I did not think that Chief  
14 Superintendent McGinn would present herself at the  
15 taking of a statement from a witness and he was  
16 inclined to agree."

13:56

17

18 So that was a matter that was canvassed, was discussed.  
19 You expressed your opinion in relation to the  
20 likelihood of the chief superintendent attending at a  
21 meeting where a witness statement was being taken, and  
22 you express your view that this was very unlikely, is  
23 that right

13:56

24 A. That's correct, Chairman.

25 522 Q. And he agreed with you that it was?

13:56

26 A. He was inclined to agree as well. Something I had  
27 never come across before.

28 523 Q. He then asked you why Ms. Simms would do this to him  
29 and why, "I replied perhaps she was not feeling the

1 best and that was the reason".

2 A. That's correct, Chairman.

3 524 Q. Did you know anything about their relationship prior to  
4 your arrival at the home of Garda Harrison?

5 A. No. And when Garda Harrison asked me, you know, why 13:57  
6 would she do that, I didn't know the lady, so how could  
7 I speculate? Just, I suppose, the comment is a bit  
8 innocent, that she wasn't feeling the best, just that  
9 was as much as I could put to it.

10 525 Q. You then go on to report that Garda Harrison: 13:57  
11  
12 "He feels the origin in the alleged complaint to the  
13 Gardaí by Ms. Simms is based on a comment he made to  
14 her in the course of a verbal disagreement when he  
15 stated 'you will get burnt there', using it as a figure 13:57  
16 of speech which Ms. Simms, he alleges, took up the  
17 wrong way."  
18  
19 Can you expand on that in any way from your  
20 recollection of what was said? 13:58

21 A. I can't really. He was explaining the situation as he  
22 seen it to me, that they had a verbal disagreement. I  
23 didn't know anything about this, I didn't know anything  
24 about the comments that were made, or anything like  
25 that. And he was impressing upon me that this was a 13:58  
26 figure of speech that he used and that she brought it  
27 up the wrong way. That was basically it.

28 526 Q. You then go on:  
29

1 "She asked him when he was working next and he said  
2 Friday, 11th October at 5:00pm."

3  
4 Then he alleged that Ms. Simms said "'I don't think you  
5 will be working'", and that's in quotation marks, is 13:58  
6 that right?

7 A. That's correct.

8 527 Q. You then go on to deal with contact with Ms. Simms, and  
9 you record:

10  
11 "Garda Harrison had 21 contacts with Ms. Simms during  
12 the day, commencing at approximately 9:20am and  
13 continuing to just before I met him. There was no  
14 contact with or by Ms. Simms while I was there. He  
15 received just one call from Mr. Jim Quinn." 13:58

16  
17 Is that right?

18 A. That's correct, Chairman.

19 528 Q. If I could just have page 1067 on the screen, please.  
20 This is the statement that you made to the Tribunal. 13:59  
21 And at the top of that page dealing with this aspect of  
22 your conversation with Garda Harrison, you say:

23  
24 "He told me that she had been in Letterkenny Garda  
25 station making a statement and, while there, had rung 13:59  
26 him about 21 times."

27 CHAIRMAN: 1067.

28 529 Q. MR. MARRINAN: "He said that during the course of one  
29 of the telephone conversations she told him that the

1 chief had come into the room while the statement was  
2 being taken and commented 'no guard's to treat woman  
3 like that, I'll see to that'. This is recorded in my  
4 notes."

5  
6 I will come to your notes in a moment. But just in  
7 relation to this, it would appear that there is a  
8 reference to Marisa Simms contacting Garda Harrison on  
9 21 occasions. The reference in your statement would  
10 tend to indicate that that was whilst she was making  
11 the statement in Letterkenny Garda Station. Do you  
12 understand?

13 A. I understand that, yeah.

14 530 Q. whilst the reference that you have here, it seems  
15 pretty clear that what you are referring to there is  
16 that Garda Harrison is telling you that he has had 21  
17 contacts with Marisa Simms during the day?

18 A. Yeah.

19 531 Q. Namely, the day that you called?

20 A. I would think that would be the correct --

21 532 Q. That is correct?

22 A. Yeah, that would be the correct interpretation.

23 533 Q. So can we take it that he wasn't, in fact, asserting at  
24 that point in time -- in fairness to Garda Harrison, he  
25 wasn't asserting that he had 21 phone contacts with  
26 Marisa Simms on the day that she was making her  
27 statement?

28 A. That would be correct.

29 534 Q. That's correct. You then go on with a paragraph in

1 relation to some security advice that you gave. Then  
2 you got a general background, in the next paragraph. I  
3 think that he discussed his relationship again with  
4 Ms. Simms and discussed that, in fact, they had broken  
5 up in September 2011, and then he had another 14:01  
6 relationship with somebody else, but he indicated to  
7 you that Ms. Simms wanted to get back with him. You  
8 then go on to deal with your observation in relation to  
9 his financial position, and then under the heading  
10 "Rental Arrangements" you deal with the position in 14:02  
11 relation to his home. And then further you deal with  
12 his background and you have an observation there in  
13 relation to the fact that he's the eldest of his  
14 family, his father was employed by the HSE as an  
15 addiction counsellor and his mother a community-based 14:02  
16 psychiatric nurse in County Galway. You note that  
17 Garda Harrison works in a voluntary capacity with  
18 Mr. Jim Quinn, who is originally from Bunrana, and now  
19 residing in Pluck, assisting people who are suicidal,  
20 and he drives Mr. Quinn around Donegal to meet with 14:02  
21 people seeking help. You then note that he had a --  
22 appears to have a close relationship with retired Garda  
23 Tom Fahy, who he worked with in Donegal Town, and has  
24 regular telephone contact with Mr. Fahy and had met him  
25 earlier in the day, I think it was, in the Clanree 14:03  
26 Hotel to offer support, is that right?

27 A. That's correct.

28 535 Q. These would all be matters that would be of concern to  
29 you as the community officer, is that right?

1 A. That's correct.

2 536 Q. And then under "Threat: I asked Garda Harrison if he  
3 attached any credibility to the threat as it was issued  
4 and stands, and he stated in his statement to Sergeant  
5 McGroary, Martin is capable of anything. He also spoke 14:03  
6 of the issue relating to the mobile phone in the cell."  
7  
8 That refers to the cell of Mr. McDermott, is that  
9 right?

10 A. That's correct. 14:03

11 537 Q. "And the alleged paramilitary connections."  
12  
13 And those were matters that were dealt with by Garda  
14 Harrison in his statement that he had made to Sergeant  
15 McGroary, is that right? 14:04

16 A. That's correct, Chairman.

17 538 Q. And you'd have had a copy of that statement with you?

18 A. I would.

19 539 Q. You went through it with Garda Harrison. And you sent  
20 that to your superintendent and also for the 14:04  
21 information of the divisional officer, is that right?

22 A. That's correct.

23 540 Q. Your notes in relation to the meeting are at page 1069.  
24 Perhaps we will just go through the relevant parts of  
25 it where we may have some difficulty with your 14:04  
26 handwriting, because we don't have a typed copy of  
27 this. It's headed:  
28  
29 "Keith Harrison, 7th October 2013 at 6:40pm."

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

You note that he has 13 years service, on the right, is that right?

A. That's correct.

541 Q. And you deal with his first house. And then you deal with "safety order". Will you just read that out. 14:05

A. It says: "Safety order in court."  
On the second line there. "Out by Thursday."

542 Q. And that's a reference to what Garda Harrison had said to you about his partner obtaining a safety order in Letterkenny courthouse, is that right? 14:05

A. That's correct, Chairman.

543 Q. And then "statement two days ago", that's a reference to what you've already told us about. And then you have noted "chief came in" and then "no guard"? 14:05

A. That's correct.

544 Q. And that's a prompt for you to recall what had actually been said, is that right?

A. Yeah. And I wrote it then further down, because I went back on that. 14:05

545 Q. Then you have a note here: "How do you retract statement/HSE?"

what was that about?

A. My recollection is, Garda Harrison asked me if a statement was made to the HSE, how would you retract it. And I didn't know, you know, I wouldn't be aware of how you would do that. 14:06

546 Q. Do you recall in what context that came up?

1 A. I think that he thought that she made the statement to  
2 somebody in the HSE and that's obviously why the HSE  
3 reference is there. I thought a lot about this, but  
4 that's the only explanation I can offer there. Because  
5 you would know how to retract a statement from the 14:06  
6 guards.

7 547 Q. And then you have a note here "wouldn't say". Is that  
8 a reference to that you wouldn't venture an opinion in  
9 relation to the retraction of the statement?

10 A. I can't -- I can't recall about that, sorry. 14:06

11 548 Q. Then you have a note "won't be working", is that  
12 "Thursday"?

13 A. "Thursday", yeah.

14 549 Q. And what's that a reference to?

15 A. I suppose these notes were jotted down as a result of 14:07  
16 the conversation that myself and Garda Harrison was  
17 having, and he had said, and it's expanded upon in my  
18 report, where he kind of outlined the structure of the  
19 meeting as, for want of a better word, and he had said  
20 that she had made a statement, Garda Harrison had said 14:07  
21 that Ms. Simms had made a statement, and he went on to  
22 say then that she had contacted him and asked him when  
23 would he be working next, to which he replied Thursday.

24 550 Q. All right. And then on the right-hand side there you  
25 will see a reference, I think it's to what Garda 14:07  
26 Harrison said that Marisa Simms had said to him about  
27 the chief superintendent. Could you just read that  
28 out?

29 A. Yeah. It's just qualifying the note further:



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

"No guard treat a woman like that, I'll see to that. Allegation of a criminal nature, going to be arrested."

That's kind of all covered in inverted commas.

14:08

551 Q. All right.

A. It would have been an expansion on what he had said to me earlier, what Garda Harrison had said to me earlier.

552 Q. Is that altogether right, down to "going to be arrested"? Because if we just look across, we can see "below won't be working Thursday, threatened to burn her", that's a reference, you've already dealt with that. "Left last Saturday the 28th", that is a reference to Garda Harrison -- or Marisa Simms leaving their home. And then "the wedding on the 4th October". And then you can see there "wedding 4th October" and then across you have got "various texts" and then after that you have got "going to be arrested". So is that in reference to the various texts?

14:08

14:09

A. I think it must have been the texts or the phone calls, that Ms. Simms had said to ask Garda Harrison when would he be working next, and he said five o'clock on the Thursday, and she had said -- allegedly said to him "'I don't think you're going to be working, you're going to be arrested'." And I just obviously noted that down, and there was allegations of a criminal nature. So the notes would be capturing what was going on in the conversation between the two of us in the kitchen.

14:09

14:09

- 1 553 Q. Then below that you have got in quotation marks "badly  
2 burnt" and then you have "two-and-a-half years nothing  
3 to do with family, no". What is that a reference to,  
4 do you recall?
- 5 A. Well, Garda Harrison had outlined the allegation that 14:10  
6 was made about burning or badly burnt, and obviously I  
7 noted it that way. And the two-and-a-half years, I  
8 think they were two-and-a-half years together in the  
9 relationship, but he had nothing to do with Ms. Simms'  
10 family or they had nothing to do with him, either/or. 14:10
- 11 554 Q. So this note ties in with the reference that you have  
12 in your report to Garda Harrison indicating that the  
13 statement that Marisa Simms had made, that he believes  
14 that she had misinterpreted what he had said, whilst he  
15 had said that she would get burnt, in the context of a 14:10  
16 reference to her and her family, is that how we can  
17 take that?
- 18 A. Yeah, I think that would be fair enough. He had said  
19 in the course of a verbal disagreement "you'll get  
20 burnt there", using it as a figure of speech, but he 14:11  
21 was of the opinion she took it up the wrong way and he  
22 was qualifying that to me.
- 23 555 Q. And then below on the right there, midway down, "21  
24 calls from 9:15", and we've now established that's on  
25 the date on which you had called to see him, is that 14:11  
26 right?
- 27 A. Yeah, that's correct. That was that date. It wasn't  
28 the date of the statement.
- 29 556 Q. You then go through some details in relation to the

1 background. None of that seems to be particularly  
2 important. You deal with the children, Andrew Simms'  
3 access, and the lease on the house, is that right?  
4 A. Yeah, just general stuff. Garda Harrison was telling  
5 me where he had resided over the different addresses 14:12  
6 and the periods of time that he was there.  
7 557 Q. And then if you just go over the page at 1070, again  
8 you're dealing with some of the background information  
9 that doesn't appear to be of any significance  
10 whatsoever. Then in the centre there, do you see again 14:12  
11 you've got, it looks like, is it "asking child"?  
12 A. Yeah, it's "asking child" and then "going to burn" in  
13 inverted commas, and there's two question marks after  
14 it.  
15 558 Q. Do you recall what that was about? 14:13  
16 A. I don't recall. Honestly, I don't recall exactly  
17 what -- whether it was another reference in the  
18 conversation we were having.  
19 559 Q. All right. Then you have "Gone a week on Saturday,  
20 wants you out of home". 14:13  
21 A. Yeah, that's a reference to Ms. Simms, that she was  
22 gone a week on Saturday and she wanted him out.  
23 560 Q. All right. And there's then some more background  
24 information that we needn't go into and a reference, I  
25 think, to Marisa Simms' mother and 'winning streak' and 14:13  
26 also Jim Quinn?  
27 A. That's correct.  
28 561 Q. So that concluded your meeting with Garda Harrison.  
29 How long did it go on for, approximately?

1 A. I was there, I think it was -- I probably left  
2 Letterkenny around six o'clock, and I think I was  
3 actually there about 6:30, "6:40pm" at the heading of  
4 those notes. Sergeant McGroary had rang me at 5:30,  
5 that is on another note, and just asked me to call out 14:14  
6 to him, so he gave me the contact number and I  
7 contacted Garda Harrison and he was there and it suited  
8 him that I would call out. So I know I was there until  
9 around eight o'clock, so an hour and twenty minutes.  
10 He made me coffee. 14:14

11 562 Q. And obviously you covered a lot of topics there in  
12 relation to his background, his relationship, his  
13 concerns at that time. Did he express any concern to  
14 you at that time or during that meeting about Marisa  
15 Simms and whether or not she had been forced into 14:14  
16 making a statement in Letterkenny Garda Station?

17 A. No. My recollection is that he -- that Garda Harrison  
18 didn't know where he made -- where Ms. Simms made the  
19 statement or to whom, but that she had made a  
20 statement, and that was initially. And then he made 14:15  
21 the comment that was passed on to him about Chief  
22 Superintendent McGinn, and we discussed that. So, you  
23 know, when you go on these calls, when I go out, it's a  
24 routine call for me to go to people who are subject to  
25 threat. You normally sit and talk to them for a while 14:15  
26 and establish different facts around the threat and  
27 their living arrangements, and all of that. Then you  
28 do a walk-through of the house, have a look. And it's  
29 difficult for somebody who is in rented accommodation

1 to what we call target-harden their house, which would  
2 be the installation of an alarm or CCTV, upgrade doors,  
3 that sort of thing. But what you would do is that you  
4 would just talk to them about the routine, and a guard,  
5 I suppose, has a certain knowledge around all of that. 14:15  
6 But you would look where they sleep, you know, how they  
7 would be alert if somebody was to basically storm the  
8 house at night, or whatever. And I was aware that  
9 there were patrols, Sergeant McGroary had told me there  
10 was extra patrols directed to the area. So I suppose 14:16  
11 all of that takes some time. And he made me coffee.  
12 He did take a phone call from Jim Quinn while I was  
13 there. So I would have been just sitting at the table  
14 taking, writing them notes that are on the screen.  
15 MR. MARRINAN: All right. Would you answer any 14:16  
16 questions.

17  
18 SERGEANT WALLACE WAS CROSS-EXAMINED BY MR. HARTY:

- 19 563 Q. MR. HARTY: Sergeant Wallace, can you explain to me  
20 what is done when a credible threat is made to the 14:16  
21 safety of somebody in terms of when you're brought into  
22 play? How is that done?
- 23 A. How is it done, yeah, well, it's -- there was two HQ  
24 directives came out, I think it might have been out of  
25 the recommendations of the Morris Tribunal, to 14:17  
26 formalise process and put in place protocols on how  
27 this would be handled and documented. The first one  
28 was HQ 200/07, 2007, and that was superseded then by  
29 the current one that we have. And we have initially,

1 it's documented by way of what they call a GIM Form 1,  
2 which is basically, if you are under threat, it would  
3 be written down what the nature of the threat is and  
4 you're given a copy of it so that you know. And I  
5 would handle Form GIM 2, is where the person is offered 14:17  
6 advice in relation to their security.

7 564 Q. Okay.

8 A. I go out, we discuss all that, and I take a note of  
9 that. They sign it. I keep the original. Then there  
10 is a 2A, a form GIM 2A, which is a tracking form, which 14:17  
11 basically tracks the process of the documentation, so  
12 it is just to formalise the process.

13 565 Q. Yeah.

14 A. I would go then and arrange to meet the person. I  
15 normally don't go on a phone call; I wait until I get 14:18  
16 some form of a file or a statement or a report or  
17 something, so I have the background.

18 566 Q. Okay.

19 A. And I go then and, as I said, you carry out an  
20 inspection or an assessment of the residence and see 14:18  
21 what -- you know, a lot of things have bearing: is it  
22 urban/rural, is it isolated, is there neighbouring  
23 houses, you know, the condition of the house, trees,  
24 you know, where someone could secrete themselves, that  
25 sort of thing, lighting. The physical parts of the 14:18  
26 house then, windows, doors, is there an electronic  
27 alarm, is there CCTV, is there a level of access  
28 control, all of that. And I prepare a report then with  
29 recommendations and I normally send it to whatever

1 superintendent, that's why that went to Milford, even  
2 though I'm based in Letterkenny, because Garda Harrison  
3 was based in Milford district.

4 567 Q. Yeah.

5 A. And because of the nature it, that it's a threat to a 14:18  
6 guard, it's copied to the chief superintendent as well  
7 because the divisional officer has to be made aware.  
8 And that's basically it.

9 568 Q. And in relation to the GIM 1 form, do you fill that out  
10 and give it to somebody even if they report to you the 14:19  
11 threat themselves?

12 A. If they report the threat themselves, no, because  
13 they're aware of it. It's where we would come on the  
14 information from a third party or picked up somewhere,  
15 intelligence, that sort of thing. 14:19

16 569 Q. But a GIM 2 form will be filled out by you regardless?

17 A. I always fill out a GIM 2 form because on the bottom of  
18 it it acknowledges that they have been given crime  
19 prevention advice. And part of that is, I give  
20 documentary -- Sergeant McGroary, he had furnished 14:19  
21 Garda Harrison with the document guidelines in relation  
22 to a threat, so he had that.

23 570 Q. Yeah.

24 A. So I didn't give him that, but would I have given him 14:19  
25 stuff about alarms and stuff. But bearing in mind that  
26 when somebody is renting a property, it's difficult for  
27 them to, what I said, target-harden, spend money. But  
28 on some occasions if there's a threat on a guard,  
29 depending on the severity, and all that, and location,

1 my report may be used to install equipment on a  
2 permanent residence.

3 571 Q. Sorry, can I just be clear in relation to that, the GIM  
4 forms aren't restricted to threats to Gardaí; they can  
5 be threats to members of the public as well? 14:20

6 A. Everybody. It covers everybody.

7 572 Q. But if it is at a conclusion of your GIM 2 assessment,  
8 and I don't know if I am using the correct phrase on  
9 that, that a guard, by virtue of the threat, requires  
10 to have upgraded security put in place for the house, 14:20  
11 that GIM 2 form can be used to requisition funds, to  
12 get funds from the division --

13 A. Yes.

14 573 Q. -- to install those procedures?

15 A. Well, it's done, it's done from Garda Headquarters. 14:20

16 574 Q. Right.

17 A. Yeah.

18 575 Q. You had a conversation with Sergeant McGroary at 5:30  
19 on the 7th October, and it was as a result of that that  
20 you went to speak to Garda Harrison or was it as a 14:21  
21 result of the second conversation?

22 A. It would have been as a result of the request from  
23 Sergeant McGroary.

24 576 Q. Yeah.

25 A. Because, as you say, it was at 5:30, it was in the 14:21  
26 office, it was in Letterkenny, he rang me and he said  
27 'I will email you through stuff', so that I --  
28 background information material, which he did. Because  
29 I had no knowledge of any background in relation to



1 this.

2 577 Q. Did you receive the reports, the 999 reports of the  
3 threats, or did you just have Sergeant McGroary's --

4 A. No, there was a consolidated report from Sergeant  
5 McGroary. I didn't have any of the other, wouldn't 14:21  
6 have either, normally, because they normally  
7 encapsulate all.

8 578 Q. Yes. And then Chief Superintendent McGinn rang you?

9 A. She did, that's correct.

10 579 Q. But it wasn't to detail you to go out. Did she already 14:22  
11 know you were going out?

12 A. I'm not sure about that. But she was obviously  
13 checking to make sure that I would go out or that I was  
14 aware that there was a threat. She wouldn't normally  
15 ring me about threats, but she just asked me was I 14:22  
16 aware of the threat on Garda Harrison. I said I was,  
17 and she said will you deal with that as a matter of  
18 urgency, and I replied to her, I said in fact I'm  
19 basically on my way now, I think he's there. Because I  
20 think maybe Garda Harrison was in Dublin or Galway 14:22  
21 or -- first of all, we weren't too sure where he was --

22 580 Q. Yes.

23 A. -- you know, but he was at the house.

24 581 Q. Did Chief Superintendent McGinn not tell you about  
25 Marisa Simms the day before -- 14:22

26 A. No.

27 582 Q. -- making a statement. And she didn't tell you about  
28 the threats made, alleged to have been made against  
29 Marisa Simms?

1 A. No.

2 583 Q. So the first you learned of them was your conversation  
3 with Garda Harrison?

4 A. With Garda Harrison, yeah.

5 584 Q. You then did a comprehensive assessment of Garda 14:23  
6 Harrison's safety in relation to it. You weren't the  
7 person assessing the seriousness of the threats as  
8 such, because you weren't assessing that evidence, you  
9 were assessing the safety of Garda Harrison, isn't that  
10 correct? 14:23

11 A. Yeah. I assess -- my job -- I carried out my training  
12 with the police in Scotland, and my job is to look at  
13 the physical infrastructure that's there, to  
14 target-harden. In relation to the category of the  
15 nature of the threat, whether it's low, moderate or 14:23  
16 high, that would normally be done by a detective  
17 inspector in consultation with the superintendent, and  
18 it may, you may be aware of it, but it would have been  
19 treated fairly seriously, but Sergeant McGroary  
20 contacted me to give me the information about where the 14:24  
21 threat was -- the nature of the threat, and that was  
22 at --

23 585 Q. Yes. But you were contacted because the threat is  
24 believed or it is believed there is a real threat,  
25 shall we say? 14:24

26 A. Yeah, well, once there's a threat on any guard, it's  
27 not maybe proper to use the phrase 'run of the mill',  
28 but it is the standard practice that I would go out.

29 586 Q. Okay. In terms of your conversation with Keith

1 Harrison in relation to Marisa Simms, why did you note  
2 that?

3 A. why did I note what?

4 587 Q. The detail in relation to the question, what Marisa  
5 Simms had said to him on the phone? 14:24

6 A. well, that's what we do. we're policemen. I note  
7 things. I would be known as a notetaker.

8 588 Q. You'd be surprised how many policemen haven't noted  
9 things in the last two-and-a-half weeks or three weeks.

10 A. well, to qualify, I was at college, I did electronic 14:24  
11 engineering, and from that point on I became a  
12 notetaker, and that's it, I write.

13 589 Q. So that is why you noted these things down?

14 A. It would be nothing new. You could pull any file of  
15 mine and there would be two pages of notes, there might 14:25  
16 be only one page of a report, but, you know, I just  
17 write down things.

18 590 Q. You don't -- but you would agree that insofar as your  
19 notes detail the relationship with Marisa Simms and her  
20 making the statement, that's not relevant to what your 14:25  
21 function was going out there on the day?

22 A. No, no relevance at all.

23 591 Q. And you -- whereas the information concerning family  
24 connections, income, all these various sort of things,  
25 were directly relevant to what you were doing because 14:25  
26 you were working out where the threat could be  
27 exercised, who there were people to contact, who you  
28 were in contact with and everything else, would that be  
29 correct?

1 A. Yeah, that'd be correct, Chairman, and, you know, the  
2 notations in relation to the rental and all that.  
3 Garda Harrison was more or less saying to me that he  
4 was finished in that house, that he would be moving on.  
5 So putting in physical infrastructure really wasn't 14:26  
6 going to be an option.

7 592 Q. Yeah. When you completed the meeting -- and just one  
8 thing I need to put to you in relation to your notes.  
9 Garda Harrison is happy that most of it records or  
10 appears to notate matters which he does recall saying. 14:26  
11 The only thing he doesn't understand, and similarly  
12 you're of the view that he would have known how to  
13 retract a statement from An Garda Síochána, he is  
14 satisfied in relation to that. He doesn't recall  
15 mentioning anything to do with the retraction of the 14:26  
16 statement and he doesn't recall -- I have to put it to  
17 you, he said nothing about the HSE?

18 A. Well, I wouldn't have recorded it if it didn't happen.

19 593 Q. I appreciate that. That is your --

20 A. You know, that is my recollection, yeah. 14:27

21 594 Q. I am formally putting that to you because, as I say,  
22 it's clear in relation to Garda Harrison's recollection  
23 of the meeting, he was agitated, he was distressed, he  
24 was the subject-matter of two direct threats on his  
25 life, it would appear that he was the subject-matter of 14:27  
26 a threat on his job vis-à-vis the statement taken from  
27 Marisa Simms, and he was aware of that, and there was  
28 also the suggestion of whether there might be some form  
29 of criminal investigation as a result of it. So, in

1 the circumstances, I think you appreciate why he was  
2 agitated?

3 A. Oh, without doubt. He was very courteous to me.

4 595 Q. Yes.

5 A. I would have to say, in response to your comment, I 14:27  
6 took the notes in front of Garda Harrison. They were  
7 taken at the table. The originals are here. There's  
8 actually a coffee stain still on them.

9 596 Q. I am putting that to you because he has no recollection  
10 of saying anything in relation to it. 14:28

11 A. Yeah, well, I would be rebutting back and saying why  
12 would I write that, "how would you retract the  
13 statement/HSE?", if it wasn't said? And it's at the  
14 early part of the notes as well.

15 597 Q. Who did you report this to, your meeting with Garda 14:28  
16 Harrison? You reported it to Milford on the night?

17 A. I would have possibly rang Sergeant McGroary back and  
18 said I have met Garda Harrison, that's done.

19 598 Q. Right.

20 A. But I think the report would have been done the 14:28  
21 following day. I'm not sure what time I finished.  
22 Normally, probably maybe around ten o'clock. I might  
23 have done it that evening. But I certainly did it the  
24 next day, because I normally do them fairly quickly  
25 while things are fresh. 14:28

26 599 Q. And when did you speak to Inspector Sheridan about it?

27 A. I don't think I ever spoke to her about it.

28 600 Q. Well, you see, Inspector Sheridan texted Marisa Simms  
29 saying that Garda Harrison was sussing out what had

1           happened with the statement, so it wasn't --

2           A.    No.

3 601 Q.    You never spoke to her?

4           A.    I can't answer that.

5 602 Q.    Did you speak to the chief superintendent afterwards? 14:29

6           A.    I don't -- I don't recall speaking to her either.

7           Because I cover the division of Donegal, and it's a

8           fairly big area, there's just one of me, and I have a

9           number of different portfolios. So normally when I do

10          my report, I'll send a hard copy by post and possibly 14:29

11          I'll send one by email. In this case, I'd say I did.

12          And that's sort of it, I move on to the next thing. So

13          if they want me, they'll make contact. I send in my

14          report and my views and sometimes they come back

15          looking for ancillary stuff, other times that's all you 14:30

16          hear. And in this case, really that was it.

17 603 Q.    Okay. Sorry, I need to correct myself. I had mixed up

18          the order of messages from -- between Inspector

19          Sheridan and Ms. Simms. In fact, her message doesn't

20          suggest that she knew from you at the time that the 14:30

21          statement, that he was inquiring about the statement.

22          So where I put to you that you had spoke to Inspector

23          Sheridan about it, that simply isn't correct?

24          A.    Yeah, I have no recollection anyway.

25 604 Q.    Still, I shouldn't leave it hanging out there. It was 14:30

26          simply my mistake in relation to it.

27          A.    But Inspector Sheridan could have been in Milford when

28          that report came in, I don't know.

29 605 Q.    In any event, you don't recall speaking with Chief

1 Superintendent McGinn about this at all?

2 A. No, I don't, no. And that wouldn't be unusual,  
3 because, as I said, I move on to the next gig and I  
4 mightn't have met chief superintendent -- I mightn't  
5 even have been in Letterkenny, you know, for a number 14:31  
6 of days, depending on where I was at and where I was.

7 606 Q. You were literally moving from --

8 A. I just work out of Letterkenny literally, you know.

9 607 Q. In circumstances where there is a -- sorry, there is a  
10 situation where Inspector Sheridan was aware that you 14:31  
11 had been out with him on the night, in that she says by  
12 text message at 8:50 on the 7th October, that's at page  
13 1588, Inspector Sheridan texted Marisa Simms at  
14 20:51:38 or 20:51 -- 20:50 on the 7th October:  
15  
16 "He might be trying to suss things out and get info."  
17  
18 This is the bit I missed and I was correcting myself.  
19  
20 "One of the lads out there with him for over two 14:32  
21 hours."  
22 A. Where's that on the page?

23 608 Q. That's -- it's the second block of text.

24 A. Oh, yeah. Yeah, I see it now, yeah.

25 609 Q. How did Inspector Sheridan know that? 14:32  
26 A. I don't know.

27 610 Q. You don't know?

28 A. No.

29 611 Q. You spoke to Sergeant McGroary after you --

1 A. That would be the commonplace thing you would do.  
2 whoever tasks you, you would ring them back and say --  
3 or send them a text or an email. I wouldn't even trust  
4 an email. I would probably follow it up with a phone  
5 call.

14:32

6 612 Q. Is it possible that in view of the fact that you were  
7 tasked by Chief Superintendent McGinn, that you rang  
8 her?

9 CHAIRMAN: That's a possibility, of course, but I  
10 understand that Fergus McGroary, Sergeant, was out with  
11 him, what, two days prior.

14:32

12 MR. HARTY: No, but this is out there with him for over  
13 two hours, that's on the 7th October.

14 CHAIRMAN: Yes.

15 MR. HARTY: He wasn't out with him for --

14:33

16 CHAIRMAN: Again, it may be that the phone is on the  
17 wrong time. 20:50:35. I thought you said you left  
18 about ten in the evening or something like that?

19 A. No, Chairman, I left -- I was gone around eight  
20 o'clock.

14:33

21 CHAIRMAN: You were gone. Okay. Well, then, it may  
22 make sense, yes.

23 A. Yeah.

24 613 Q. MR. HARTY: And in circumstances whereby this is the  
25 text being sent in relation to the question of whether  
26 or not she'd made a statement, Fergus McGroary was out  
27 before the statement was made on the 5th October, so  
28 that couldn't be the explanation in relation to this.  
29 It has to refer to you, I think, you would accept that?

14:33



1 A. No, I would say it refers to me, yeah.

2 614 Q. Is it possible that you phoned Chief Superintendent  
3 McGinn? She had phoned you just before?

4 A. Yeah, but I don't think -- I don't think I would have.  
5 I would say, I would think that I probably -- I do a 14:33  
6 lot of business on the phone --

7 615 Q. Yeah.

8 A. -- so I probably rang Fergus McGroary on my way back  
9 in, either on his mobile or to the station.

10 616 Q. And either Fergus McGroary rang Inspector Sheridan or 14:34  
11 Chief Superintendent McGinn, or it's possible that you  
12 rang Chief Superintendent McGinn and said 'I've gone  
13 from there, I've dealt with it'?

14 A. It wouldn't be the usual thing that I would bother  
15 really ringing about. Because she asked me to go, I 14:34  
16 went. Job done.

17 617 Q. Okay. But in any event --

18 A. I've no recollection of -- I have no -- I have a  
19 recollection of ringing Sergeant McGroary, but I have  
20 no recollection of ringing anybody else. 14:34

21 618 Q. Okay. In any event, at most, an hour after you finish  
22 the meeting with Garda Harrison, Inspector Sheridan  
23 knows -- you certainly would have had no reason to  
24 contact Inspector Sheridan?

25 A. No, because I wouldn't know what -- that she had 14:34  
26 anything to do with anything, for want of a convoluted  
27 way of saying it. I just wouldn't, no.

28 619 Q. Insofar as your statement and your report and your  
29 conversation with Garda Harrison was very relevant to

1 something that was then discussed the following morning  
2 at a conference in Letterkenny Garda Station, did  
3 anyone ask you about that, about your conversation with  
4 Garda Harrison?

5 A. No, I've no recollection of that either, no. 14:35

6 620 Q. No. Nobody told you that they needed a report from you  
7 now in relation to it?

8 A. No, there was no follow-up report, just the report that  
9 has appeared on the screen. And as I say, that was the  
10 routine way of dealing with it. 14:35

11 621 Q. The reason why I say that is, there was a meeting the  
12 next day to deal with the threats against Garda  
13 Harrison, and that was -- the high-level meeting that  
14 was convened by Chief Superintendent McGinn was to deal  
15 with threats made by Garda Harrison and threats to 14:35  
16 Garda Harrison. Can I put it to you that it's  
17 surprising that in assessing the threats to Garda  
18 Harrison, nobody came and spoke to the person who had  
19 just done the assessment of the threats against Garda  
20 Harrison. You were the person who had done the 14:36  
21 assessment of the threats on the ground, isn't that  
22 right?

23 A. That's correct.

24 622 Q. And nobody came and spoke to you about them?

25 A. No. Now, I may have been asked to do the report, but I 14:36  
26 just can't remember. I wasn't aware of any meeting in  
27 relation to it.

28 623 Q. Well, your report is dated 8th October?

29 A. It is.

1 624 Q. The meeting took place at 10:00 in the morning?  
2 A. Yeah. I doubt if I would have had that report done at  
3 10:00 in the morning.  
4 625 Q. Yeah. And you would agree that your report would be  
5 very relevant to people who are assessing how to deal 14:37  
6 with the threats made against Garda Harrison?  
7 A. I would hope it would be.  
8 626 Q. Yeah.  
9 A. What was the reason for sending me out there?  
10 627 Q. Yeah. 14:37  
11 A. But there you are.  
12 628 Q. The question in relation to people, other people  
13 against whom threats were made, where they report  
14 threats themselves, the appropriate procedure is that  
15 GIM 2 would then be carried out, isn't that correct? 14:37  
16 A. Yeah, I would have completed GIM 2 and Garda Harrison  
17 signed it. I actually have it. It's probably there.  
18 629 Q. There are two people in the Donegal division who  
19 exercise your function, is that correct? Did I get  
20 your evidence correct? Or are you the only person? 14:37  
21 A. No, me.  
22 630 Q. Just you?  
23 A. Yeah.  
24 631 Q. So in relation to the threats against Marisa Simms,  
25 were you ever contacted? 14:38  
26 A. No.  
27 632 Q. In relation to the threats against the life of the  
28 children of Marisa Simms, were you ever contacted?  
29 A. No.

1 MR. HARTY: Thank you very much.

2 A. Thank you.

3 MR. DOCKERY: If I might ask a few brief questions,  
4 sir.

5 CHAIRMAN: Sorry, Mr. Barnes, do you have any 14:38  
6 questions?

7 MR. BARNES: I beg your pardon. I have no questions.  
8

9 SERGEANT WALLACE WAS CROSS-EXAMINED BY MR. DOCKERY:

10 633 Q. MR. DOCKERY: Sergeant Wallace, just a few quick 14:38  
11 questions. As you know, I represent Inspector Sheridan  
12 and Sergeant McGowan and two other members. I just  
13 want to ask you, if I might, with regard to your  
14 meeting on the 7th October at Garda Harrison's house, I  
15 think your evidence is that he told you that he was 14:38  
16 aware that a statement of complaint had been made about  
17 him by Marisa Simms a day or two previously?

18 A. That's correct, yeah.

19 634 Q. He was clearly aware of it then, isn't that so?

20 A. That's correct. 14:39

21 635 Q. And I think he expressed the view to you that, and you  
22 have noted it, that the origin of the complaint as he  
23 understood it was what he described as a misunderstood  
24 threat?

25 A. That's correct. 14:39

26 636 Q. Yeah. And in your contemporaneous report you have used  
27 the phrase that his understanding was that that was the  
28 origin of the complaint, was this issue of a threat,  
29 isn't that so?

1 A. Sorry, can you repeat that? I can't hear you.

2 637 Q. I think you recorded in your contemporaneous memo that  
3 his understanding, as communicated to you, was that the  
4 allegation of a threat was the central cause of the  
5 complaint that had been made against him? 14:39

6 A. That's correct.

7 638 Q. Yeah. And he gave you an explanation for how that  
8 arose or what -- he explained to you that that had been  
9 a misunderstanding, isn't that so?

10 A. Yes. He said it was based on a comment during a verbal 14:40  
11 disagreement.

12 639 Q. Yes. He told you, I think, that immediately before  
13 your arrival at the house, he had been in telephone  
14 contact with Marisa Simms, and that had been one of 21  
15 telephone contacts between them that day? 14:40

16 A. That's correct.

17 640 Q. And can I put it to you, therefore, that he was  
18 indicating to you that Marisa Simms was the source of  
19 whatever information or knowledge she had about -- he  
20 had about the statement, isn't that so? 14:40

21 A. Yeah, that would be correct.

22 641 Q. Yeah. And he knew, didn't he, that it was a statement  
23 in the form of a complaint and that it had been made  
24 against him, isn't that right?

25 A. That's right. 14:40

26 642 Q. Yeah.

27 A. That's correct.

28 643 Q. And we have already established that he knew it was  
29 about a threat that he had allegedly made in essence to

1 her, isn't that so?

2 A. That's correct.

3 644 Q. He told you that Marisa Simms had conveyed to him that  
4 the chief superintendent had appeared at the interview  
5 room at some stage and made a remark, which, had it 14:41  
6 been made, might have been a source of concern to him,  
7 isn't that so?

8 A. That's correct.

9 645 Q. He was able to tell you that Marisa Simms had conveyed  
10 to him that she had been at Letterkenny District Court 14:41  
11 earlier that day to seek a safety order against him,  
12 isn't that right?

13 A. That's correct, Chairman.

14 646 Q. And that she had conveyed to him that he would not be  
15 working the following Friday as he was anticipating, 14:41  
16 isn't that so?

17 A. That's correct, that's what he told me.

18 647 Q. And he told you that she had even gone so far as to  
19 tell him that he was likely to be arrested, isn't that  
20 right? 14:41

21 A. That's correct, and I noted that in my notes.

22 648 Q. Can I take it that we would agree, Sergeant, that any  
23 person receiving the information that you were  
24 receiving would understand that the woman who is giving  
25 this -- the person or the woman who is giving him this 14:42  
26 information was a woman who understood and was able to  
27 convey to him that she had made a complaint about him  
28 which was likely to instigate a criminal investigation  
29 which could give rise to his arrest?

1 A. Yeah, that would be correct. But I would feel that was  
2 part of his demeanour, that was part of his demeanour,  
3 that he was nervous and agitated because there was  
4 things coming at him from a number of angles, the  
5 threat.

14:42

6 649 Q. Yes.

7 A. And then this information that had been relayed to him,  
8 that he relayed to me and I noted down.

9 650 Q. To put it another way: he wasn't, it would appear,  
10 suggesting to you that Marisa Simms had told him that  
11 she had had a chat with a Gardaí, that she didn't know  
12 what it was going to lead to, that she wasn't sure what  
13 she had done, that she needed his help, that she was  
14 distressed by anything the Gardaí had done to her?

14:42

15 A. At the time when I was in the house I felt that  
16 Ms. Simms was conveying to Garda Harrison that she had  
17 made a statement. As I said earlier, I don't think he  
18 was aware of, had she made one or two or was it one to  
19 the guards and one to the HSE or both. But basically,  
20 she was conveying to him that she had made a statement.  
21 He was asking me did I know anything about the making  
22 of a statement, which I didn't.

14:43

23 651 Q. Yeah.

24 A. And I didn't know that there was statements made for a  
25 considerable time afterwards.

14:43

26 652 Q. So therefore, not only was he giving you a lot of  
27 information about what he knew of the statement, but he  
28 was asking you -- he was seeking information from you  
29 as to whether you knew anything about the circumstances

1 of the taking of the statement?

2 A. That's correct, Chairman. He was giving me a lot of  
3 information, information that I hadn't anticipated  
4 getting. It wasn't of a lot of use to me. It probably  
5 set the context for the whole meeting, as such. He was 14:44  
6 nervous and agitated because, I suppose, he could see  
7 doors were closing, for want of a better word, all  
8 around him. And I wasn't aware of any of this. I  
9 didn't know who -- that a statement had been made by  
10 Ms. Simms or if it actually had been made or where it 14:44  
11 was made or to whom it was made.

12 653 Q. And you've noted that he even brought up with you the  
13 question of whether the statement, or if he thought  
14 there were two statements, one of the statements could  
15 be retracted? 14:44

16 A. Yeah, I think that he thought there was two statements  
17 made. I just have that mind -- I have that in my mind,  
18 you know, and it's subject -- it's just my view, my  
19 opinion.

20 654 Q. Beside your note in regard to that query you have 14:44  
21 written the letters "HSE".

22 A. Yes. Because I can recall that he said how would you  
23 retract a statement if it was made to the HSE, or if a  
24 statement was made to the HSE, how would you retract  
25 it. And I didn't -- I had no knowledge. 14:45

26 655 Q. Do you recall whether he made any reference to being  
27 aware of a referral to the HSE arising from the  
28 statement of complaint?

29 A. No, I don't. I've no memory of that now.



1 656 Q. Yeah. Can I ask you about his state of nervousness,  
2 agitation. He was alone in the house. Was it your  
3 impression that that state of mind related to these  
4 matters I'm discussing with you now, or did they  
5 relate, do you think, to the threats that had been made 14:45  
6 against him?

7 A. I would feel that -- my feeling or my opinion would  
8 have been that there was a lot happening in his life in  
9 the previous couple of days. Ms. Simms had left, the  
10 kids were gone. 14:46

11 657 Q. Yeah.

12 A. The threats had come. From my memory of it and my  
13 feelings about it, that he was more concerned about  
14 what was happening with Ms. Simms and the statements  
15 and was he going to be arrested and did the chief come 14:46  
16 in and say all this. We discussed all that. The  
17 threats nearly became the second part of the whole  
18 thing, if you can understand what I am trying to  
19 articulate to you --

20 658 Q. Yeah. 14:46

21 A. -- because he was of the opinion they came from  
22 Ms. Simms' brother and, you know, he said he would be  
23 capable of anything, and he referred to, that he had  
24 access to a phone and that he had paramilitary  
25 connections and all of that. But in my mind's eye, 14:46  
26 looking back, the emphasis was on what was happening  
27 with his partner and the kids and what was going to  
28 happen into the future.

29 659 Q. And correct me if I am wrong, but my impression from

1 your evidence is that you went out to the house to  
2 fulfil a particular function, but that after you  
3 arrived there, that he was preoccupied by these  
4 particular issues and was discussing all of these and  
5 aspects of his personal life with you as you sat at the 14:47  
6 kitchen table?

7 A. Yeah, and I found it very strange, because I would know  
8 most of the guards in the division but I didn't know  
9 Garda Harrison. I hadn't met him. He was very  
10 courteous to me. As I said, he made me coffee. But he 14:47  
11 was very preoccupied. He volunteered all this  
12 information to me. The number of calls that had  
13 happened, even the times from I think it was 9:05 to  
14 before I -- just before I came on the day, and the  
15 whole emphasis was on relaying that information to me. 14:48  
16 That I suppose in the context of why I was there, and  
17 it's not to trivialise it, was irrelevant really, and  
18 it wasn't information that I had knowledge of, or  
19 anything like that. He volunteered all that  
20 information to me. He told -- and it was like if he 14:48  
21 wanted to get it off his chest or to talk to somebody.

22 660 Q. Yeah.

23 A. Because I was concerned, because I spoke to him  
24 about -- which I normally possibly wouldn't, about did  
25 he access welfare and did he have somebody, because I 14:48  
26 was conscious that he was living up in Donegal on his  
27 own, and you can see there in my report I refer to his  
28 home circumstances, his mum and his dad, and that sort  
29 of thing. And I think I advised him, I think it's

1 covered in the report, to maybe take a few days and go  
2 down to Galway, just to clear his head and get away out  
3 of the way, for want of a better word, because he  
4 didn't seem to be too sure at that time whether they  
5 were going to be staying in the house. They had moved 14:49  
6 around a lot. And if Ms. Simms was going to be gone,  
7 he really couldn't afford it, and he spoke about his  
8 circumstances in Roscommon and the economic crash and  
9 all of that.

10 661 Q. So he was concerned as well about his finances at the 14:49  
11 time?

12 A. Yes.

13 662 Q. Did you get any impression from talking to him, that 14:49  
14 arising from the statement of complaint, the alleged  
15 presence of the chief superintendent in the room at one  
16 point, and so on, that he was concerned about his  
17 career?

18 A. Well, he possibly was, because he said, you know, he  
19 said to me about the chief being present there, and I  
20 think I started to laugh, you know, basically, and we 14:49  
21 had a joke, kind of, around it, and I said I don't  
22 think that would happen. I have never ever seen or  
23 heard of that happening in my life.

24 663 Q. Yeah.

25 A. But I can't say because I don't know, I wasn't there. 14:49  
26 And I didn't know where there was, where the statement  
27 was taken or made. But I would say there was concern  
28 around, you know, as I said, there was a lot of doors,  
29 perceived doors closing on him and there was a lot of

1 pressure on him, and, as an individual, I felt sorry  
2 for him.

3 664 Q. It would appear that he was very upset, and that  
4 evidence you've given would appear to be corroborated  
5 by other evidence that the Tribunal has heard. I want 14:50  
6 to just put one piece of it to you. A telephone  
7 exchange by text, which occurred on the 7th October,  
8 the same day, later that evening, it would seem, at  
9 20:48 the time is recorded, the text was an exchange  
10 between Marisa Simms and Inspector Sheridan, and it 14:50  
11 appears at page 1588 of the materials.

12  
13 "Inspector Sheridan opened the conversation by texting  
14 Marisa 'Just wondering did you tell Keith you made a  
15 complaint? He mentioned to a guard about you looking 14:51  
16 for a safety order, etcetera. Just wondering.  
17 Thanks.'"

18  
19 And Marisa Simms' reply:

20  
21 "Hi. He told me that he was talking to Dave Kelly this  
22 morning and that he thought that he was off with him on  
23 the phone and asked if I had been talking to anyone. I  
24 asked him to stop calling or I would get a safety  
25 order. He calling me crying all day. Seems in a bad 14:51  
26 way."

27  
28 That would be broadly consistent with your impression,  
29 that he was agitated, distracted, upset, isn't that so?

1 A. Yes, that'd be correct, and that was probably 48  
2 minutes, obviously, or around three quarters of an hour  
3 after I had left.

4 665 Q. Yeah. And I suggest to you that it's consistent with  
5 your evidence that what he was upset and preoccupied 14:51  
6 and agitated about was his relationship with Marisa  
7 Simms and the twist it had taken within the previous 24  
8 to 48 hours?

9 A. Yeah, that'd be correct, because I do recall that it  
10 took me a while to get him to do the walk through 14:51  
11 around the house, which was normally the first thing  
12 you would do, because all of this other information was  
13 now coming on the table, as such.

14 666 Q. Did he see that you were taking a note? I think you  
15 have told the Tribunal this afternoon that you were 14:52  
16 sitting at the kitchen table while he spoke?

17 A. Yeah. And I sat at the kitchen table and I had my  
18 folder and the papers I have with me here now, and I  
19 would have written the notes in front of him, and I  
20 remember at one stage I probably added in the bits that 14:52  
21 needed to be added in while he was on the phone to  
22 Mr. Quinn, because he rang sort of about a half an hour  
23 or so after I had gone in.

24 667 Q. You wouldn't have known at the time, of course, but the  
25 evidence you've given about the impression you took 14:52  
26 from the information you received about the state of  
27 mind of Marisa Simms, would appear to be corroborated  
28 by the fact that the following day, on the 8th October,  
29 she revisited Letterkenny Garda Station to hand in her

1 mobile phone. Did you learn of that or hear about that  
2 afterwards?

3 A. Can you come at that again, please?

4 668 Q. The following -- I'll shorten the question, I'm sorry.  
5 You've given evidence that you had the firm impression 14:53  
6 from what you were told by Keith Harrison that Marisa  
7 Simms had been conveying to him that she had made a  
8 statement of complaint which would initiate a criminal  
9 investigation and had told him that he might be  
10 arrested, all right? 14:53

11 A. Yeah.

12 669 Q. You wouldn't have known at the time that the following  
13 day, on the 8th October, she went back to Letterkenny  
14 Garda Station to assist in that advancement of the  
15 investigation by handing in her mobile phone, isn't 14:53  
16 that so?

17 A. No, I didn't know that.

18 MR. DOCKERY: Yes. All right. Thank you very much.

19 A. Thank you.

20 CHAIRMAN: Mr. Barnes, did you want to ask any 14:53  
21 questions arising out of that? If you want to ask any  
22 questions, please feel free to do so. I'm not saying  
23 you have to or you should, but I'm saying that has come  
24 along now, so --

25 MR. BARNES: Yes. I've simply asked Ms. Simms to keep 14:53  
26 a careful watch on what was going on and I haven't any  
27 further instructions at this point in time.

28 CHAIRMAN: Do you want a few minutes?

29 MR. BARNES: well, I take it that the witness --

1 CHAIRMAN: Do you want to consult for five minutes and  
2 we will come back? I mean, ask her if you wish.  
3 MR. BARNES: I think that we can proceed with the next  
4 witness and I'll take instructions as we go along.  
5 CHAIRMAN: Would you mind hanging on -- 14:54  
6 A. No problem.  
7 CHAIRMAN: -- until we finish today?  
8 MR. BARNES: That is perhaps the best way to do it.  
9 CHAIRMAN: I am sorry, did you have any further  
10 questions? 14:54  
11 MR. DIGNAM: I have no questions, Chairman.  
12 MR. MARRINAN: No questions.  
13  
14 SERGEANT WALLACE WAS THEN QUESTIONED BY THE CHAIRMAN:  
15 670 Q. CHAIRMAN: There are two things I want to ask you. As 14:54  
16 you may appreciate if you have read any of the  
17 transcripts, I don't want to drag people into this who  
18 are not in it already, and one of those certainly is  
19 Martin McDermott. Now, the statement that was made to  
20 sergeant McGroary the previous day, presumably you read 14:54  
21 that or read it at some stage?  
22 A. I did, yeah.  
23 671 Q. CHAIRMAN: Yes. And if that is so, it seems to  
24 indicate that Keith Harrison, by virtue of being on the  
25 receiving end of a threat, made an assumption, which 14:55  
26 may be completely incorrect and I'm certainly not going  
27 to conclude that it came from a family member and in  
28 particular Martin McDermott, but that seems to have  
29 been what his conclusion was, that this was the person

1           who might have it in for him, so to speak?

2           A.    Yeah, that'd be correct, Chairman.

3 672 Q.    CHAIRMAN: Yes. And all I know about that individual  
4           is the manslaughter. But was there other -- would  
5           there be cause, possible, potential cause for concern? 14:55  
6           I mean, whether it's correct or incorrect is neither  
7           here nor there, but would it be something you might be  
8           concerned about?

9           A.    I couldn't really comment because I would know very  
10          little about Martin McDermott -- 14:55

11 673 Q.    CHAIRMAN: All right. That is fair enough.

12          A.    -- other than that he was involved in the road traffic  
13          accident, that was it.

14 674 Q.    CHAIRMAN: But did he seem to be taking it seriously as  
15          a credible threat? 14:55

16          A.    Yeah, I would think he probably was, yeah. You know,  
17          he said he just -- his words to me was that Martin is  
18          capable of anything. Now, whether that was getting a  
19          phone call made or getting somebody to do something, I  
20          don't know. 14:56

21 675 Q.    CHAIRMAN: Yes, yes.

22          A.    Because I would know -- I wouldn't have any knowledge  
23          about the individual.

24 676 Q.    CHAIRMAN: All right. Now, the second thing I wanted  
25          to ask you about was: Your particular specialty is in 14:56  
26          relation to -- well, I mean, you have other things to  
27          do as well, but one of the things you do is this whole  
28          thing about death threats and giving people advice and  
29          firming up on the target, etcetera. Do you deal with



1 domestic violence, as such?

2 A. No, no, Chairman, no.

3 677 Q. CHAIRMAN: Yes. What advice can you give to someone  
4 who, let's say, has an on/off relationship with  
5 somebody who, to get him away from this case and just 14:56  
6 to mention another case that many years ago I was  
7 involved in, was beating up his wife with a flex of a  
8 kettle, I mean what advice can you give such a person  
9 if they go back to the individual? Can you give them  
10 any safety advice of any kind? 14:57

11 A. Not really. You know, it's a very, very difficult one.  
12 That whole area of domestic dispute and domestic  
13 violence, there are the protections that you're well  
14 aware of in legislation, but to get a quick fix is  
15 probably get out and stay out. It's like dealing with 14:57  
16 a fire, and ring 999, you know. There's nothing -- as  
17 I would often say to young guards going into domestic  
18 violence, I always think -- I've 32 years done in the  
19 guards now, and I often think that the most dangerous  
20 call that you will ever do is a domestic violence 14:57  
21 dispute and the most dangerous room in the house is the  
22 kitchen, because you have ample ammunition, be it a  
23 frying pan, boiling water, knives, you know. And it's  
24 something you would never think in the ordinary day to  
25 day. But to go back to your question, it's very 14:57  
26 difficult, and it's amazing how the people go back to  
27 that type of -- I suppose, children and everybody has  
28 the -- you know, there's different factors at work  
29 there, but it's very, very dangerous -- very, very

1 difficult, I should say. In relation to domestic  
2 violence incidents, there was a few times that I was  
3 asked or tasked to go, and I actually would have said I  
4 was one of -- I'd be one of the worst people to go  
5 there because I wouldn't have an up-to-date knowledge 14:58  
6 on the laws because I don't be in court now too much.  
7 My role is more specialist, and it's really all about  
8 infrastructure, it's going to somebody. And if you go  
9 to someone, go a lady or a male, who is in a disruptive  
10 relationship, who are in a rented house, they don't 14:58  
11 have the means nor the financial means to really  
12 target-harden, which is basically the heavy end of the  
13 type of work I do.

14 CHAIRMAN: Yes.

15 A. And the threats go right across society, whether it's 14:59  
16 drug related or financially related, or whatever.

17 678 Q. CHAIRMAN: I know in Dublin there's a women's refuge, I  
18 think it's in Rathmines, opposite the church there. Is  
19 there any such place, is there any such help in  
20 Donegal? I have heard simply talk of a committee. 14:59  
21 That is as much as I have --

22 A. No, we have a women's refuge in Letterkenny.

23 679 Q. CHAIRMAN: You do?

24 A. Yeah. They actually moved into a new premises, and I  
25 would have done out security or the -- yeah, well, call 14:59  
26 it, for want of better word, the security plan for it -  
27 cameras, access, control, all that sort of thing - so  
28 that someone literally can't come up and -- and you  
29 would ensure that doors are capable of withstanding

1 robust criminal attack.

2 680 Q. CHAIRMAN: Yes.

3 A. And access control cameras and that.

4 681 Q. CHAIRMAN: Is that there long now?

5 A. God, it must be five or six years. But there was 14:59

6 always a women's refuge, but it was basically -- it was

7 in a semi-detached house in a nondescript location.

8 And they moved now to a more -- a purpose-built place.

9 682 Q. CHAIRMAN: And is that a kind of a HSE-type funded

10 thing or is it voluntary? You possibly don't know? 15:00

11 A. I don't -- I'm not sure. There would be a HSE

12 involvement, I would think, all right, and probably

13 fundraising and all that.

14 CHAIRMAN: That kind of stuff, yes. Thanks, Sergeant.

15 A. Thank you. 15:00

16 MR. BARNES: I'm sorry, Chairman. Yes, I do have one

17 question.

18 CHAIRMAN: Sorry, Sergeant, if you wouldn't mind

19 waiting.

20 15:00

21 SERGEANT WALLACE WAS CROSS-EXAMINED BY MR. BARNES:

22 683 Q. MR. BARNES: In the phrasing of Mr. Dockery's question,

23 he referred, Mr. Dockery referred to a statement of

24 complaint, and I'd just like you to confirm that -- if

25 you can, for us, that Garda Harrison, as far as you 15:00

26 knew, did not know, in fact, what type of statement

27 Marisa had made?

28 A. Yeah, that's correct. You know, can I quote from my

29 report?

1 684 Q. By all means.

2 A. Yeah. "He spoke about Chief Superintendent McGinn  
3 coming into the room and he said she had made a  
4 statement to the guards two days ago about his  
5 treatment of her and he didn't disclose any specific 15:01  
6 allegations. He asked me if I knew it was true and I  
7 replied I had no knowledge of this development. I  
8 asked him where and to whom the statement was made and  
9 he replied that Ms. Simms did not disclose this."

10

11 I don't know, does that answer your question? 15:01

12 MR. BARNES: Thank you very much.

13 CHAIRMAN: Great. Thank you, Sergeant.

14

15 THE WITNESS THEN WITHDREW 15:02

16

17 MS. LEADER: The next witness, sir, is Detective  
18 Inspector Patrick O'Donnell. His statement is at page  
19 1073 of the materials.

20

21 DETECTIVE INSPECTOR PATRICK O'DONNELL, HAVING BEEN  
22 SWORN, WAS DIRECTLY EXAMINED BY MS. LEADER: 15:02

23 685 Q. MS. LEADER: Detective Inspector O'Donnell, if you  
24 wouldn't mind telling the Tribunal about your career in  
25 An Garda Síochána to date? 15:02

26 A. Yes, I entered Templemore on the 18th August '82. I  
27 completed my training on the 21st January '83. On that  
28 date I was transferred to Castlefinn, where I remained  
29 on border duty until 12/9/'97, where I was transferred

1 to the traffic unit in Letterkenny. I remained there  
2 until the 2/4/'98, when I was promoted to rank of  
3 sergeant and transferred to Burnfoot, again back on the  
4 border. I remained in Burnfoot on a unit until I was  
5 transferred back to a unit in Letterkenny, on the 15:03  
6 24/6/'99. I remained on unit in Letterkenny there  
7 until I applied for a job in the divisional office, and  
8 on 22/1/'02 I was successful, I was appointed  
9 divisional clerk to superintendent. I was divisional  
10 clerk then until 15/2/'05, when I was promoted to the 15:03  
11 rank of inspector. At that time I was transferred to  
12 Glenties, taking up duty as acting superintendent for a  
13 number of months until the 31st August '05 when I was  
14 transferred back into Letterkenny, to act as a duty  
15 inspector performing duty in the courts and various 15:04  
16 portfolios. I then applied for the position of  
17 detective inspector in 2010. On 10th December 2010 I  
18 was appointed detective inspector for Donegal division,  
19 with responsibility for crime, ordinary and subversive  
20 crime, covering the whole division. 15:04

21 686 Q. I think on 4th October Superintendent English, who was  
22 the duty superintendent, informed you about a threat  
23 that had been made to Garda Harrison?

24 A. Yes. I was off duty that evening and I got a call from  
25 Superintendent English to inform me that this threat 15:04  
26 had been made, yes. I was actually working the  
27 weekend, so it was well of him to ring me to inform me  
28 what was going on.

29 687 Q. And did you take any steps at that time?

1 A. Oh, no, I was at my home at that stage, it was late in  
2 the evening, and Superintendent English was taking care  
3 of matters. I was on duty the next day. I was on duty  
4 for the weekend. I didn't take any steps. He was  
5 taking care of matters that night.

15:05

6 688 Q. Okay. And the next day you spoke to Mary O'Donnell,  
7 who has given evidence to the Tribunal, in relation to  
8 calls received to An Chuir Hotel where there was a  
9 wedding on?

10 A. Yes. When I arrived at work the next day, I normally  
11 call into the communications room. I was informed by  
12 the guard on communications that Mary O'Donnell had  
13 called and said that a number of calls had been made to  
14 An Chuir Hotel. I rang Mary O'Donnell and I asked her  
15 was she working and I told her I would be sending out a  
16 detective just to speak to her in terms of what  
17 happened or getting some context on those calls. I  
18 then contacted Detective Garda Moore, who covered that  
19 area. I briefed him on what had occurred, and he  
20 undertook to go to the hotel and speak to  
21 Ms. O'Donnell.

15:05

15:05

15:06

22 689 Q. And later on that day I think you were contacted by  
23 Garda Conway, who was on duty in the communications  
24 room, who told you about a second phone call that had  
25 been made in relation to a threat to Garda Harrison?

15:06

26 A. That's correct. I was in my office and Garda Conway  
27 contacted me and informed me that the caller who had  
28 made the call the previous evening had repeated the  
29 call and repeated the threat. At that stage I

1 contacted Superintendent English. I informed him of  
2 the renewed threat. He gave me a number of  
3 instructions to carry out in relation to informing  
4 Garda Harrison, in relation to putting some security in  
5 place. I was in charge of detective branch, armed 15:06  
6 security around Garda Harrison's premises and putting  
7 various -- contacting the regional support unit, and I  
8 went out to Garda Harrison's house at around 5:00pm  
9 that day to meet with him. He wasn't there. I  
10 subsequently learned that he was actually in Milford 15:07  
11 making a statement at the time. At around four o'clock  
12 that day I also got a report from Detective Garda Moore  
13 outlining what occurred in the hotel in Gweedore. I  
14 think that's in the documents before the Tribunal.

15 690 Q. I think you subsequently conducted an investigation 15:07  
16 into the threats that were made to Garda Harrison, and  
17 the documentation in relation to that investigation is  
18 in the Tribunal documents?

19 A. Well, the threats were basically a person rang up and  
20 gave us information -- 15:07

21 691 Q. Yes.

22 A. -- that he had overheard people talking about taking  
23 action against Garda Harrison, in a pub in Northern  
24 Ireland, in Strabane. I wasn't actually investigating  
25 them; I was assisting the investigation. I deal with 15:08  
26 intelligence and I have contact with people who deal  
27 with telephones. And it was a detective sergeant who  
28 was dealing with the investigation. So I was dealing  
29 with the technical end of things, making applications

1 to crime and security, in terms of getting phone data  
2 and trying to identify this caller so he could be  
3 interviewed.

4 692 Q. Okay. So you took charge of the tracing phone?  
5 A. The technical end of things, yes. 15:08

6 693 Q. Okay. Now, subsequently you attended at a meeting in  
7 Letterkenny Garda Station in relation to Garda  
8 Harrison?  
9 A. Yes. As I said, I was working that weekend, but I was  
10 off Sunday, Monday, Tuesday. 15:08

11 694 Q. Yes.  
12 A. And I was called in to brief the meeting, what occurred  
13 at the weekend. I don't believe that Superintendent  
14 English was available. So I was called in as the duty  
15 inspector on the weekend, I just happened to be on. 15:08

16 695 Q. Who called you in?  
17 A. The office of the chief superintendent's office, a  
18 member of staff there called me in to brief the  
19 meeting. I called in and outlined what happened during  
20 the weekend in terms of both calls we received, the 15:09  
21 intelligence we received and the incident at the hotel.  
22 That was my function there.

23 696 Q. Did you make any notes or retain any notes in relation  
24 to that meeting?  
25 A. No, no. 15:09

26 697 Q. What did you understand was your purpose in attending  
27 that meeting, before you actually attended it,  
28 Detective Inspector?  
29 A. To brief the meeting what occurred at the weekend. I



1 was the man on the ground at the weekend, I had  
2 firsthand knowledge of what went on. Superintendent  
3 English wasn't available, obviously. So I was called  
4 in to brief the meeting what occurred. To bring the  
5 meeting up to speed on what had occurred and what had 15:09  
6 been put in place in terms of the security of Garda  
7 Harrison at his house.

8 698 Q. When did you find out about that meeting?  
9 A. It would be on the Monday, I believe. Just I was off  
10 Sunday, Monday, Tuesday. 15:09

11 699 Q. Okay. And the Monday was what date, can you remember?  
12 A. The 7th.

13 700 Q. The 7th. In relation to anything else that was  
14 discussed at that meeting, can you tell the Tribunal  
15 have you any memory of anything else that was 15:10  
16 discussed.

17 A. We were discussing a statement which, the first time I  
18 saw the statement from -- that was made Marisa Simms, I  
19 was obviously looking at the statement in terms of what  
20 possible crimes were committed. I know I wouldn't have 15:10  
21 any dealings with GSOC or Tusla, that wouldn't be my  
22 area of specialisation. But I would have knowledge of  
23 the law in terms of what possible -- so I would have  
24 gave my view on that, but not in relation to GSOC or  
25 Tusla. 15:10

26 701 Q. Do you remember anything else about the meeting, how  
27 long it went on for?  
28 A. No.

29 702 Q. And in relation to Tusla, do you have any memory -- did



1 journals relates to all operational officers and  
2 inspectors, isn't that correct?

3 A. Yes, that's correct.

4 707 Q. And it covers you?

5 A. It does, yeah. I have a journal. 15:11

6 708 Q. But you didn't enter, in relation to any of this,  
7 anything in your officers journal?

8 A. I didn't, I don't put everything into the journal in  
9 terms of --

10 709 Q. Yes. In relation to the threats against Garda Keith 15:12  
11 Harrison they identified -- the caller identified  
12 Martin McDermott as being the potential source of the  
13 threat in the second call, isn't that correct?

14 A. Well, he mentioned Martin McDermott and some of his  
15 associates, yes. 15:12

16 710 Q. Yes. But he said it was in relation to Martin  
17 McDermott, I think is what is contained --

18 A. Yes.

19 711 Q. -- in the initial report in relation to it. And that's  
20 how the name Martin McDermott came to be associated 15:12  
21 with these threats, because in fact the person who  
22 reported it used his name?

23 A. I think, from memory, it's basically stated that  
24 because of the way Keith Harrison was allegedly  
25 treating Marisa -- 15:12

26 712 Q. Yes.

27 A. -- that Martin McDermott had an issue with it.

28 713 Q. There was a suggestion in relation to that?

29 A. Yes.

1 714 Q. The phone call on the 5th October from Mary O'Donnell,  
2 from the hotel, she was told -- given a number by Rita  
3 McDermott of a female garda to ring, but it obviously  
4 was the number for Letterkenny Garda Station that came  
5 through to you, is that how that happened? 15:13

6 A. It would appear, yeah. There was a female garda on  
7 duty in Communications, so she may have spoke to her.

8 715 Q. No, I think she was given a specific number, was her  
9 evidence in relation to it, and I think she understood  
10 it to be a female garda. But obviously it was a 15:13  
11 landline into Letterkenny Garda Station that came in to  
12 you?

13 A. Yeah, yeah.

14 716 Q. And that she was slightly surprised that a detective  
15 inspector or that a detective was sent out to her to 15:13  
16 take a statement in relation to it, that was her  
17 evidence to the Tribunal?

18 A. Yes.

19 717 Q. She was uncomfortable with it, she felt something was  
20 up? 15:14

21 A. Yes, I heard that, yes.

22 718 Q. What was the nature of the phone call and your note of  
23 what she said to you on the phone on the 5th October?

24 A. That basically she was the receptionist on duty, that a  
25 person called and said they were Garda Keith Harrison. 15:14  
26 There also had been a call to another person who worked  
27 for the hotel, and no name was given.

28 719 Q. Sorry?

29 A. And no name was given, the first caller. And she

1 was -- basically, she was concerned about the call.  
2 Obviously, she rang the station, so she was concerned.  
3 I didn't go into great detail on the phone with her  
4 because I was intending to send somebody out to speak  
5 to her in person. I informed her -- I asked her was 15:14  
6 she on duty in the hotel and she said she was. I  
7 informed her that I would be sending somebody out to  
8 speak to her.

9 720 Q. So what notes did you take of that?  
10 A. What notes did I take at the time? 15:15

11 721 Q. Yes?  
12 A. I have notes in my journal -- or not in my journal, but  
13 in my diary. Now, I didn't make the notes on the day;  
14 I made the notes when I was doing the report.

15 722 Q. Right. Well, no, somebody is talking to you on the 15:15  
16 phone, surely --  
17 A. No, I didn't make any notes when I was speaking to her  
18 on the phone, no.

19 723 Q. No. You didn't make any notes?  
20 A. No, because I acted on it straightaway, I rang 15:15  
21 Detective Garda Moore straightaway.

22 724 Q. Mary O'Donnell was of the view, and her evidence is  
23 very clear, that there was nothing particularly odd  
24 about these phone calls, that she had been put pressure  
25 on by Rita McDermott to call the guards in relation to 15:15  
26 it?  
27 A. That was outlined in Garda Moore's report, and I accept  
28 that, yeah.

29 725 Q. Did she say that to you?

1 A. No, she didn't, no. That was a subsequent report I  
2 received. I didn't actually -- nothing happened with  
3 that in terms of --

4 726 Q. Except that you were called into the meeting on the 8th  
5 October because of the threat to Garda Harrison and 15:16  
6 because of the hotel incident. That was your  
7 evidence-in-chief.

8 A. Well, no, I was called in, I gave a briefing on the  
9 threats and the hotel incident. I don't believe they  
10 knew about the hotel incident until I briefed them on 15:16  
11 it. They knew about the threats, all right. That is  
12 the reason I was called in, to outline what action was  
13 taken on the threats. But myself and D/Garda Moore  
14 were the only two guards who knew about the phone  
15 calls, and I included that in my briefing. 15:16

16 727 Q. Were you present at that part of the meeting where the  
17 HSE and Tusla were discussed?

18 A. I have no recollection of it.

19 728 Q. You have no recollection of it?

20 A. No. 15:17

21 729 Q. Do you recall the conversation regarding GSOC?

22 A. No. I recall looking through the statement in terms of  
23 what particular offences possibly, allegedly were  
24 committed and giving my view on those. Because those  
25 are areas that I would be involved in day-to-day. I 15:17  
26 wouldn't have any involvement with GSOC or Tusla. I  
27 have no interest in those organisations.

28 730 Q. Would you have left the meeting before GSOC was  
29 discussed?

1 A. It's possible, yes. I've no recollection. It's  
2 unlikely, but --

3 731 Q. You're aware that you're the third person now who  
4 attended that meeting who has no recollection of the  
5 HSE or Tusla being discussed? 15:17

6 A. I wasn't here for all of the Tribunal, I don't know. I  
7 accept that, yeah, if that is what you are saying.

8 732 Q. You didn't take any notes of that meeting?

9 A. No. I was just there to brief the meeting. I possibly  
10 was expecting to get some jobs out of it, because when 15:18  
11 I go to a meeting with senior management I have a list  
12 of things to do. I didn't get any jobs. There was  
13 nothing more forward for me, so I just left after that.

14 733 Q. If you had gotten jobs, would it not have been useful  
15 to have notes of what went on at the meeting? 15:18

16 A. Oh, if I had got jobs, I would have taken notes.

17 734 Q. But the job mightn't be highlighted to you until the  
18 end, surely you would need to have notes of what went  
19 on in the meeting so you could make sense of the job?

20 A. Well, if I got a job then I could take notes in terms 15:18  
21 of what I heard at the meeting and then follow on from  
22 that. But, I mean, I only basically take notes if I  
23 have something to do in terms of going forward.

24 MR. HARTY: Thank you very much, Detective Inspector.

25 MR. BARNES: No questions, Chairman. 15:18

26 MR. DOCKERY: Nothing arising.

27 MR. DIGNAM: No questions, Chairman.

28

29 SERGEANT WALLACE WAS RE-EXAMINED BY MS. LEADER:

1 735 Q. MS. LEADER: One thing I should have asked you,  
2 Detective Inspector O'Donnell. You actually did make  
3 diary entries, which is attached to your statement, in  
4 relation to what happened on the 5th October, is that  
5 correct? 15:19

6 A. Yes. I made an entry, but it wasn't at the time. When  
7 I was making my report a few days later, I did a report  
8 for the chief super.

9 736 Q. Yes.

10 A. So I wrote in that what happened that day, yeah, but 15:19  
11 not at the time.

12 737 Q. That's what appears at page 1076 of the materials  
13 attached to your statement.

14 A. Mm-hmm.

15 MS. LEADER: Thanks very much. 15:19

16 A. Okay.

17 CHAIRMAN: Thanks, Detective Inspector.

18

19 THE WITNESS THEN WITHDREW

20 15:19

21 MS. LEADER: The next witness, sir, is Superintendent  
22 Mary Murray of Sligo Garda Station, and her statement  
23 is at page 2090 of the materials and there's a short  
24 supplemental statement at page 2550.

25 15:19

26 SUPERINTENDENT MARY MURRAY, HAVING BEEN SWORN, WAS  
27 DIRECTLY EXAMINED BY MS. LEADER:

28 738 Q. MS. LEADER: Superintendent Murray, if you would  
29 outline your career in An Garda Síochána to date for



1 the Tribunal, please.

2 A. I joined An Garda Síochána in April of 1981, and in  
3 October of '81 I was transferred to Manorhamilton Garda  
4 Station in County Leitrim where I was engaged on  
5 operational and border duties. In 1988 then I 15:20  
6 transferred into Sligo Garda Station where again I  
7 became engaged in general policing and operational  
8 duties. In 1990 I was promoted to the rank of sergeant  
9 and I transferred out to Blacklion in County Cavan,  
10 where I remained there until 1996. And whilst I was in 15:21  
11 Blacklion, I performed duty with the UN in Cambodia for  
12 six months in 1993. In 1996 then I transferred into  
13 Sligo as the training sergeant for the Sligo-Leitrim  
14 division. And in 2003, in December 2003, I got  
15 promoted to the rank of inspector and I was transferred 15:21  
16 to Pearse Street Garda Station. And in September 2004  
17 I returned to Sligo Garda Station, where I started work  
18 as the regional inspector in the office of the  
19 assistant commissioner northern region, and I remained  
20 there until June of 2010, when I was promoted to the 15:21  
21 rank of superintendent and transferred to Ballymote  
22 Garda Station. And in December 2010 I was transferred  
23 back into Sligo Garda Station, where I took up the  
24 position of superintendent, and that's where I remain  
25 today. 15:22

26 739 Q. Now, on the 10th February 2014 Chief Superintendent  
27 McGinn appointed you as an investigating officer under  
28 regulation 23 of the Garda Síochána Disciplinary  
29 Regulations in relation to Garda Keith Harrison, is

1           that correct?

2           A.    That's correct.

3 740 Q.    And, in particular, you were to investigate -- you were  
4           to conduct both a disciplinary and criminal  
5           investigation, is that correct?

15:22

6           A.    That's correct.

7 741 Q.    And essentially you were asked to investigate two  
8           things, which are set out at page 2095 in the  
9           appointment document, that Garda Harrison allegedly  
10          verbally and physically abused, assaulted, harassed and  
11          threatened to kill/harm Ms. Marisa Simms on various  
12          dates throughout their relationship, and secondly,  
13          Garda Harrison accessed details on Ms. Simms' vehicle  
14          on Pulse on 25 different occasions between the 26th  
15          August 2009 and the 27th April 2013.

15:23

16          A.    That's correct.

17 742 Q.    Now, when you were appointed I think you met with Chief  
18          Superintendent McGinn in order to discuss the  
19          appointment, and materials that she had gathered, is  
20          that correct?

15:23

21          A.    Yeah.  while Chief Superintendent McGinn had appointed  
22          me and the date of my appointment was 10th February  
23          2014, that appointment had arrived in the post  
24          separately.  But there was relevant papers, for example  
25          the statement of Ms. Simms, and other documentation  
26          that were relevant to my investigation.  And on the  
27          19th February I met Chief Superintendent McGinn at  
28          Blacklion, where she handed me the document which I  
29          have outlined as Appendix 1 in my statement.

15:24

1 743 Q. So in the post you got a letter informing you of your  
2 appointment and the actual formal document which  
3 appointed you, which is at page 2095 of materials, is  
4 that correct?

5 A. Yeah, form IA31. 15:24

6 744 Q. And thereafter, you met with Chief Superintendent  
7 McGinn and she gave you a variety of different  
8 documentation, is that correct?

9 A. Yes. Which I have identified or labelled as Appendix 1  
10 in my statement. 15:24

11 745 Q. And I won't open the individual documents, but I will  
12 just go through them so as you can confirm to me that  
13 that is what you got. First of all, you got Ms. Simms'  
14 two statements, the statement of withdrawal and the  
15 statement of complaint, is that correct? 15:24

16 A. That's correct.

17 746 Q. The second thing then that it would appear that you  
18 got, which is at page 2120 of the materials, is Rita  
19 McDermott's statement of the 2nd October 2013?

20 A. That's correct. 15:25

21 747 Q. Then you got, at page 2122 of the materials, the report  
22 that Chief Superintendent McGinn had completed, which  
23 is dated 12th November 2013, which is her request to  
24 appoint somebody to investigate the matter, is that  
25 correct? 15:25

26 A. That's correct.

27 748 Q. That basically summarises the situation with regard to  
28 Garda Harrison?

29 A. Correct.

1 749 Q. The next thing that would appear in the documentation  
2 at page 2127 is the appointment -- is the referral  
3 which was made by Superintendent Eugene McGovern to  
4 GSOC pursuant to section 102 of the Garda Síochána Act,  
5 is that correct? 15:25

6 A. That's correct.

7 750 Q. And that would be at 2127 of the materials. The next  
8 separate documents would appear to be the report that  
9 Superintendent English completed on the 7th October  
10 2013 in relation to the threats made to Garda Harrison, 15:26  
11 and the first page of that would appear to be at page  
12 2131 of the materials?

13 A. That's correct.

14 751 Q. The next relevant matter I think is at page 2136 of the  
15 materials, and it is the documentation connected with 15:26  
16 what we are referring to as the Bogle incident on the  
17 1st April 2013?

18 A. That's correct.

19 752 Q. So there was Sergeant Doherty's report of that date, is  
20 that correct? 15:26

21 A. That's correct.

22 753 Q. And then we have, from page 2139 onwards, Sergeant  
23 Durkin's report in relation to Rita McDermott's calls  
24 to Donegal Town Garda Station?

25 A. That's correct. 15:27

26 754 Q. There were two reports there in relation to the matter.  
27 You then have various correspondence which attaches to  
28 those reports, I think, and you then at page 2148 of  
29 the materials, relates to the anonymous-letter

1 material, the anonymous letter of February 2012?

2 A. That's correct.

3 755 Q. And Sergeant McGowan's reports emanating from that, is  
4 that correct?

5 A. Correct. 15:27

6 756 Q. Then at page 2153 of the materials there is Chief  
7 Superintendent Sheridan's material generated as a  
8 result of Garda Harrison's accessing of Pulse in  
9 relation to Marisa Simms?

10 A. That's correct. 15:28

11 757 Q. That is nothing to do with the car accessing of Pulse,  
12 am I correct about that?

13 A. That's correct, yeah. That was personal checks.

14 758 Q. Yes. And then we have in relation to -- the next  
15 associated documentation would appear to be from page 15:28  
16 2158 of the materials onwards, and that relates to the  
17 alleged threats made to Marisa Simms and Keith Harrison  
18 by Andrew Simms, dating from May 2011?

19 A. That's correct.

20 759 Q. And there are various reports connected with those 15:28  
21 matters, is that correct?

22 A. That's correct.

23 760 Q. Now, I think that essentially was the fairly  
24 comprehensive file that Chief Superintendent McGinn  
25 handed you to go along with the appointment -- 15:29

26 A. Yes.

27 761 Q. -- in relation --

28 A. And it was appropriate to hand it to me personally as  
29 opposed to sending it through the normal channels of

1 post.

2 762 Q. And normally would it have been put through the post?

3 A. Well, sometimes. I mean, there's a lot of confidential  
4 information in that, a lot of sensitive information in  
5 it, and it was appropriate to -- I believe, to 15:29  
6 hand-deliver it to me.

7 763 Q. Did you speak to Chief Superintendent McGinn about it  
8 or have any conversation?

9 A. On the 19th February when I met Chief Superintendent  
10 McGinn in Blacklion she handed me that document which 15:29  
11 we've just gone through there.

12 764 Q. Yes.

13 A. She just went through the statement of Ms. Simms and  
14 the -- the two statements of Ms. Simms and the  
15 statement of Ms. Simms' mother. She explained to me a 15:29  
16 very brief background on the fact that threats had been  
17 made to Garda Harrison. And she also explained to me  
18 that the HSE, the matter had been reported to the HSE,  
19 the HSE had been involved, but that it was understood  
20 that both Mr. Harrison and Marisa Simms were back 15:30  
21 living together again. And if my memory serves me  
22 right, that possibly the HSE had concluded their  
23 inquiries and their investigations at that time.  
24 Possibly. I believe that that might be the case.

25 765 Q. Do you actually have a memory of that? 15:30

26 A. I know Tusla and the HSE were mentioned --

27 766 Q. Yes.

28 A. -- in the conversation, in particular the referral and  
29 the fact that they were back together again.

1 767 Q. And that was in January, am I correct? Was this in  
2 January or February, sorry?

3 A. Oh, this is in the course of my meeting with Chief  
4 Superintendent McGinn.

5 768 Q. Yes.

15:30

6 A. When she was just going through the statements.

7 769 Q. Yes.

8 A. And she just explained to me that the matter had been  
9 reported to Tusla and that it was understood that both  
10 Mr. Harrison and Ms. Simms were now living back  
11 together again.

15:30

12 770 Q. Okay. We know, Superintendent Murray, that no  
13 investigation was ultimately conducted by you, and if  
14 you would explain to the Tribunal how that came about,  
15 please?

15:31

16 A. Well, I most certainly never set out not to carry out  
17 an investigation into either the criminal aspects or  
18 the disciplinary aspects. I suppose the first part of  
19 an investigation or commencing an investigation is to  
20 notify the party involved, and in this case it was  
21 Garda Keith Harrison. And in the course of March and  
22 April, I made contact with Sergeant Durkin in Donegal  
23 Town Garda Station, inquiring about when Garda Harrison  
24 may be working. And I was having difficulties in that,  
25 because in that period I was being informed that he  
26 was -- he was off sick or he was on rest days or he was  
27 on leave, so I was having quite a difficulty in trying  
28 to get him. Plus, I suppose that was complicated by  
29 the fact that I wanted to -- I availed of leave myself

15:31

15:31

1 in April, 14 days in April. But I wanted to meet Garda  
2 Harrison personally because I noted from reading the  
3 file and reading the statements there's a lot of issues  
4 going on here and I felt he deserved the courtesy of  
5 meeting me in person, which is what I would normally do 15:32  
6 anyway for any investigation that I am doing. Then in  
7 May of 2014 I became aware, through media, I suppose,  
8 national and local media, that Garda Harrison had  
9 entered the Confidential Recipient process, and at that  
10 point, I knew straightaway, I believed straightaway 15:32  
11 myself, that it was inappropriate for me to approach  
12 him because he may feel that -- and I appreciate that I  
13 am assuming here and I'm thinking here, but I did  
14 rationalise it, that I took on board, or I was of the  
15 belief that if I approached him at that particular 15:33  
16 point, once he had entered the Confidential Recipient  
17 process, that it may be seen as a form of harassment or  
18 it may be seen as an effort on the part, on my part, on  
19 the part of chief superintendent in Donegal, on the  
20 part of the Garda organisation in general, to hinder 15:33  
21 him or prevent him from engaging with the process.  
22 771 Q. Okay. Did you speak to any of your superior officers  
23 about that view that you formed?  
24 A. I did not, I did not. However, I do notice in the  
25 affidavit of Ms. Simms dated 7th March 2017, at page 15:33  
26 47, she actually reflects what I was thinking. She  
27 says that my -- that we have --  
28  
29 "Garda Síochána have vindictively attempted to



1 prosecute Keith for breaches of discipline and commence  
2 a criminal investigation with the statement that I have  
3 been forced to make some 14 months previously and that  
4 I had later taken back. This was clearly an attempt to  
5 put further pressure on me." 15:34

6  
7 And in Garda Harrison's statement of the 1/3, which is  
8 at page 32, he identifies:

9  
10 "On 1st December 2014 I received a letter from 15:34  
11 Superintendent Mary Murray of Sligo Garda Station  
12 stating she had been appointed by Chief Superintendent  
13 Terry McGinn to conduct both a criminal and a  
14 disciplinary investigation into the argument between  
15 Marisa and I some 14 months earlier. This was clearly 15:34  
16 a malicious investigation to cause further upset and  
17 stress to me and my family and to discredit me and  
18 exert further pressure on me to desist with my  
19 allegations."

20 772 Q. So you thought you would avoid that type of situation 15:34  
21 by leaving the matter for May?

22 A. Yes. And I didn't want to, I suppose, burden Garda  
23 Harrison with the extra stress of having a discipline  
24 and I suppose a criminal investigation, albeit that  
25 there were going to be difficulties with the criminal 15:35  
26 investigation anyway in terms of the withdrawal of the  
27 statement. But that wasn't the only difficulty. But I  
28 felt that by not approaching him at that time, it was  
29 appropriate not to do that.

1 773 Q. Okay. And the letter that you referred to, that you  
2 sent to Garda Harrison, I think it appears at page 2169  
3 of the materials. It should be in front of you,  
4 Superintendent, on the screen?

5 A. Yes. When I felt -- so this was -- I was appointed in 15:35  
6 February. Garda Harrison entered the Confidential  
7 Recipient process mid-May, reportedly, and I felt that  
8 a reasonable time had elapsed when December came along.  
9 The investigation was still on my books, I was still  
10 the appointed person, it had to be done, it required to 15:36  
11 be done, and so I decided on the 1st December that I  
12 would write to Garda Harrison -- I was aware that Garda  
13 Harrison was still off sick, because obviously I had  
14 made an inquiry in the interim, was he back, at  
15 different times between May and December, I did make 15:36  
16 inquiries was he back, I was told he wasn't, and at  
17 that point I decided I would send the letter that you  
18 referred to.

19 774 Q. Okay. Essentially that letter, you're notifying Garda  
20 Harrison that you had been appointed as investigating 15:36  
21 officer to investigate the alleged breaches of  
22 discipline as set out in the attached copy of a form  
23 which was with the letter, and you also were telling  
24 him that you had been appointed to conduct a criminal  
25 investigation into the matters detailed on the attached 15:36  
26 form?

27 CHAIRMAN: Yes. Would you mind giving a page number,  
28 because I think we are on a completely different page.

29 MS. LEADER: Sorry, 2169.

1 A. That is the letter.

2 775 Q. Is that your letter?

3 A. That is the letter I sent, yes.

4 776 Q. And you asked him to contact you with a view to, it's  
5 the third paragraph of the letter, "for a meeting to 15:37  
6 discuss the investigative process", and you also  
7 requested "that you acknowledge receipt of form 1A32 in  
8 the section provided at the bottom of the document and  
9 return same to me in the envelope provided."  
10 And you gave him your phone number, your email address 15:37  
11 and your landline number, is that correct?

12 A. Yes, that's correct.

13 777 Q. Now, if we could just turn to the next page,  
14 Superintendent, at page 2170 of the materials, it sets  
15 out the appointment -- your appointment pursuant to the 15:37  
16 regulation, it's identified on it, and that you were  
17 investigating Garda Keith Harrison, and the details are  
18 set out, that he allegedly verbally and physically  
19 abused, assaulted, harassed and threatened to kill/harm  
20 Ms. Marisa Simms on various dates and that he accessed 15:38  
21 details on Ms. Simms' vehicle on 25 different occasions  
22 between the 26/8/2009 and 2013?

23 A. That's correct.

24 778 Q. And then in the notification of the investigation, it  
25 replicates that information to a huge extent, but I 15:38  
26 think there was one matter that you made an error on in  
27 relation to that, and if you could explain that to the  
28 Tribunal, please.

29 A. That's correct.

1 779 Q. That's at page 2171 of the materials.

2 A. Point 1, the allegation was in relation to physical  
3 abuse, assault, harassment and threats on various dates  
4 throughout their relationship. And unfortunately I  
5 picked the beginning of the relationship, the date at 15:38  
6 the beginning of the relationship, which, as per  
7 Ms. Simms' statement, was in 1998, whereas, in reality,  
8 you know, it was really only from February 2011 when  
9 Ms. Simms and Garda Harrison resumed their relationship  
10 and Garda Harrison was a member of the Garda Síochána 15:39  
11 at that time. I wasn't permitted and I shouldn't have  
12 picked the date 1st October 1998. Garda Harrison  
13 wasn't a member of the Garda Síochána at that time, so  
14 therefore that date was not relevant.

15 780 Q. Okay. And I think the next thing you did then on the 15:39  
16 16th December was you wrote to Marisa Simms, and that  
17 letter appears at page 2173 of the materials. And  
18 you're essentially telling Ms. Simms that you had been  
19 appointed by Chief Superintendent McGinn to carry out a  
20 criminal investigation into allegations of assault and 15:39  
21 harassment made by her in her statement to Inspector  
22 Sheridan, is that correct?

23 A. That's correct.

24 781 Q. And you also told her that you had been appointed to  
25 conduct an investigation into the above matters under 15:40  
26 the auspices of the disciplinary regulations, the Garda  
27 Síochána disciplinary regulations?

28 A. That's correct.

29 782 Q. And you also asked her to contact you and gave her your

1 contact details?

2 A. That's correct.

3 783 Q. Now, I think you were then advised through Chief  
4 Superintendent McGinn that Garda Harrison had sought to  
5 review your appointment in the High Court, and that 15:40  
6 letter appears at page 2175 of the materials.

7 A. That's correct.

8 784 Q. And you were asked to put a stay on all matters  
9 relating to the investigation until further notice?

10 A. Yes. Within a short period of receiving my letter, it 15:40  
11 appears Garda Harrison, which was within his right to  
12 do, went to the High Court seeking to, I suppose, stop  
13 or prevent or put a stay on the disciplinary  
14 proceedings, which I had informed him about.

15 CHAIRMAN: Is there a date on that letter? I just 15:41  
16 can't see it at the moment.

17 MS. LEADER: I think the date of Chief Superintendent  
18 McGinn's letter is 26th January 2015.

19 A. That's correct.

20 785 Q. It's underneath Chief Superintendent McGinn's 15:41  
21 signature. Yes, 2175. Now, I think there matters lay  
22 until March when you then got another letter from Chief  
23 Superintendent McGinn asking had Garda Harrison  
24 consented to all discipline matters being placed in  
25 abeyance pending the outcome of the High Court 15:41  
26 proceedings?

27 A. Yes. Chief superintendent Internal Affairs had had  
28 queried if Garda Harrison had consented to all  
29 discipline matters being put in abeyance pending the

1 outcome of these High Court proceedings.

2 786 Q. And Chief Superintendent McLoughlin's query, which is  
3 dated 11th February 2015, appears at page 2178 of the  
4 materials. And that would appear to have prompted  
5 Chief Superintendent McGinn's query to you, is that 15:42  
6 correct?

7 A. Yes. Even though, you know, no action had been taken  
8 once Garda Harrison had entered the High Court process.

9 787 Q. And you were clear that that was the correct way to  
10 proceed once the High Court had put a stay on the 15:42  
11 matter?

12 A. Yeah. Chief superintendent had directed that I was to  
13 put a stay on all matters, and that's what I did.

14 788 Q. Okay. But I think just to satisfy yourself in relation  
15 to, that that was the correct way to proceed, you 15:42  
16 actually wrote to Garda Harrison's solicitors, I am not  
17 sure of the -- I think it's May 2015, is that correct?

18 A. Yes, that's correct.

19 789 Q. That letter appears at page 2180 of the materials,  
20 asking them to confirm that Garda Harrison was 15:43  
21 consenting to placing your investigation in abeyance  
22 pending the High Court, is that correct?

23 A. That's correct.

24 790 Q. And I think Garda Harrison's solicitors replied to you  
25 and confirmed that that was the correct way to proceed? 15:43  
26 A. Yeah, and they were surprised that the question was  
27 being asked but, they were obviously aware that it was  
28 ceased, yeah.

29 791 Q. Now, I think ultimately you swore an affidavit in

1 relation to the High Court proceedings explaining what  
2 you have explained to this Tribunal, why you didn't  
3 proceed in relation to your appointment, your  
4 disciplinary investigation and criminal investigation,  
5 as soon as Chief Superintendent McGinn had appointed 15:43  
6 you, is that correct?

7 A. That's correct.

8 792 Q. And the High Court placed a permanent stay on your  
9 investigation due to that delay, is that correct?

10 A. Yeah, due to inordinate delay. 15:44

11 793 Q. Yes.

12 A. And that -- you know, that wouldn't be unusual, delay  
13 in discipline investigations, quite a number of cases  
14 stated in relation to delay, and the regulations would  
15 say to inform the person as soon as practicable about 15:44  
16 your appointment, and obviously it was deemed that I  
17 hadn't done that on this occasion.

18 794 Q. I think you took responsibility for that, is that  
19 correct?

20 A. Absolutely. 15:44

21 795 Q. Yes. Now, I think you had received a number of  
22 reminders via Chief Superintendent McGinn in July 2014,  
23 is that correct?

24 A. That's correct.

25 796 Q. I think on the 8th July 2014 Chief Superintendent 15:44  
26 McGinn forwarded you a letter from the chief  
27 superintendent Internal Affairs looking for a status  
28 report on the progress of the investigation?

29 A. That's correct.

1 797 Q. And that letter appears at page 2556 of the materials,  
2 is that correct, Superintendent?

3 A. That's correct.

4 798 Q. Now, the letter from Chief Superintendent McLoughlin is  
5 dated 30th June 2014. That appears at page 2557 of the 15:45  
6 materials?

7 A. That's correct, that's correct.

8 799 Q. And there also had been a reminder from Chief  
9 Superintendent McLoughlin on the 24th April 2014, and  
10 that was sent to you on the 29th April 2014? 15:45

11 A. That's correct.

12 800 Q. I suppose really I would like to ask you, why at that  
13 stage didn't you act on foot of those reminders?

14 A. Yeah, in hindsight I should really have. Rather than  
15 taking the responsibility for ceasing or not starting 15:45  
16 or not commencing the investigation myself in May of  
17 2014, in hindsight I should have written to chief  
18 superintendent Internal Affairs seeking guidance as to  
19 whether I should carry on, given the circumstances or  
20 given the developments, or whether I should seek or put 15:46  
21 a stay on my appointment. I didn't do that. I  
22 probably should have done that.

23 801 Q. Other than those reminders, which have been opened to  
24 the Tribunal, did you have any discussions with anybody  
25 else in relation to your appointment to investigate 15:46  
26 Garda Harrison?

27 A. No, I did not.

28 MS. LEADER: If you would answer any questions anybody  
29 else might have for you, Superintendent.



1

2

SUPERINTENDENT MURRAY WAS CROSS-EXAMINED BY MR. HARTY:

3

802 Q. MR. HARTY: Superintendent Murray, firstly can I ask you what notes you kept in your officers journal in relation to this?

15:46

6

A. I have a note in relation to -- in my diary, in relation to my meeting with Chief Superintendent McGinn on the 19th February 2014 when she gave me the relevant papers.

10

803 Q. I'm asking about your officers journal.

15:47

11

A. Yeah. I don't have a note of that in my officers journal, but I do have that meeting recorded in two areas: my personal diary and my work diary.

14

804 Q. What details do you have in your personal diary in relation to it?

15:47

16

A. Same, same thing.

17

805 Q. What does it say?

18

A. Judge, can I refer to my personal diary? Okay, there's an issue on that date, I obviously was doing other duty in relation to the coroner's court in Sligo, I have a short note on that. And then I have "Met T McGinn re Harrison file at 3:00pm Blacklion".

15:47

23

806 Q. And what entry -- is it a similar entry in your work diary?

25

A. Yes. I have it here.

15:47

26

807 Q. I take it to be appointed as investigating officer under the discipline regulations is a matter of importance?

29

A. Yes. All appointments under, be they discipline or

1 criminal, are important, yes.

2 808 Q. And therefore, it is an appointment which, in  
3 accordance with the directives, ought to be entered in  
4 your officers journal?

5 A. That may well be the case, but I did not. I don't 15:48  
6 think one would be realistically recording the  
7 appointment to do something, because the paperwork is  
8 there, there's a paperwork trail there in relation to  
9 it. I wouldn't be writing down "appointed by Chief  
10 Superintendent McGinn on the" -- whatever date, early 15:48  
11 February, it was the 10th February. I had received --  
12 you know, shortly after that I had received the  
13 appointment, the form IA31, so I wouldn't be recording  
14 that I had received it.

15 809 Q. And your notes of the meeting with Chief Superintendent 15:48  
16 McGinn?

17 A. I have recorded that I had the meeting. I have a very  
18 clear reflection -- or recollection of the meeting  
19 itself.

20 810 Q. And your notes of the decision to hold off on the 15:49  
21 disciplinary investigation following the Confidential  
22 Recipient being contacted by Garda Harrison?

23 A. I don't have a note of that. But that date is very  
24 clearly embellished in my mind as being approximately  
25 the 14th and 15th May when that matter hit the media 15:49  
26 headlines, and I knew straightaway that I was going to  
27 have a difficulty in relation to the investigation that  
28 I was appointed to carry out.

29 811 Q. And where did you note that?

1 A. I didn't note that.

2 812 Q. And when you were written to twice asking for updates  
3 in relation to it, you didn't note any of this?

4 A. I didn't record or I didn't report up the line, so to  
5 speak, that on account of the -- I suppose the 15:50  
6 processes that Garda Harrison had entered into, that I  
7 felt that my investigation should be put on hold or put  
8 in abeyance, I did not do that.

9 813 Q. Who did you contact about Garda Harrison being on duty  
10 or off duty? 15:50

11 A. I rang Sergeant Durkin, because I knew he was on Unit B  
12 in Donegal Town, I knew Sergeant Durkin was his  
13 supervisor, and I rang Sergeant Durkin from time to  
14 time.

15 814 Q. Where did you note those calls? 15:50

16 A. I didn't note those calls.

17 815 Q. If Sergeant Durkin had said that Garda Harrison was  
18 absent for four days or ten days in a particular month,  
19 surely it would have been useful to note that down so  
20 that you would know what day Garda Harrison would be 15:50  
21 back?

22 A. I knew when he was expected back, I was always told  
23 when he was expected back, and I would have made a call  
24 maybe within the next group of six working days that he  
25 would have been due to be there. But I know that Garda 15:50  
26 Harrison was on a lot of -- a lot is the wrong -- is  
27 the incorrect word, but approximately there's 85 days  
28 between the 19th February, when I receive my  
29 investigation file, and the 14th or 15th May when the

1 development in relation to Garda Harrison was reported.  
2 And out of those 85 days, roughly 56 of them Garda  
3 Harrison wasn't there, through rest days, through  
4 annual leave and through sick leave, so that didn't  
5 leave me with very many days. 15:51

6 816 Q. How did you establish that, Superintendent Murray?  
7 A. I know that --

8 817 Q. That's rather precise?  
9 A. I know that from -- obviously from the records that  
10 have been produced here to the Tribunal. 15:51

11 818 Q. No.  
12 A. And I know that from the roster.

13 819 Q. Sorry, Superintendent Murray, no --  
14 A. No, they are.

15 820 Q. There was no records produced in relation, certainly 15:51  
16 not for the consumption generally, it might have been  
17 produced through the Garda Síochána, but certainly  
18 there was no records produced to me indicating Garda  
19 Harrison's --

20 A. I refer you to my affidavit. 15:52

21 821 Q. Right.  
22 A. I think it's Appendix 8.

23 822 Q. Yes. How did you get those dates?  
24 CHAIRMAN: well, let's hear about the affidavit first.  
25 MR. HARTY: It's contained in her affidavit in the High 15:52  
26 Court.  
27 CHAIRMAN: No, but let's hear about the affidavit  
28 please, Mr. Harty.

29 823 Q. MR. HARTY: Page 2185.

1 A. In my affidavit, I highlighted the dates that Garda  
2 Harrison was on sick leave and on annual leave, within  
3 the period of the 19th February to the 14th/15th May.

4 824 Q. And did you highlight in any space in your affidavit  
5 the days on which you attempted to make contact? 15:52

6 A. No, I did not.

7 825 Q. No?

8 A. I haven't kept a record, but I was aware when Garda  
9 Harrison should be back. I was informed he's sick this  
10 week, or he's on leave this week, he should be due 15:53  
11 back. I would be very familiar with the roster system,  
12 and in particular the roster dates for Unit B, all  
13 units, members have four days off together, they work  
14 six and they're off four, so it's very easy to  
15 calculate around that. 15:53

16 826 Q. Now, there is no requirement under the Garda Síochána  
17 discipline regulations for anything to be served on  
18 anyone personally, isn't that correct?

19 A. My understanding is that you have to notify the member  
20 against whom the discipline has been initiated -- a 15:53  
21 discipline investigation, I should say, has been  
22 initiated. You have got to notify that member, plus  
23 the member is required to acknowledge receipt. My  
24 Appendix 2 and the form attached to that refers. Form  
25 IA32 "I acknowledge receipt of this notice". 15:54

26 827 Q. Well, in fact, there's nothing in the regulations that  
27 require the member to acknowledge it. Regulations  
28 provide that you must notify them as soon as is  
29 reasonably practical of your appointment, isn't that

1 correct?

2 A. That's correct, yeah. But good practice would say  
3 that, or would dictate that the member needs to  
4 acknowledge in writing, and hence that is the purpose  
5 of form IA32. 15:54

6 828 Q. Now, if we look at page 2171, which is the notice of  
7 investigation, firstly you possibly have an original  
8 copy there, can you tell me what date is on that?

9 A. Yeah, the first -- I signed that on the 1st December  
10 2014, which is the date that I sent the letter to Garda 15:54  
11 Harrison. I kept the original.

12 829 Q. Yes. You had no difficulty sending it by post on that  
13 date?

14 A. I did not.

15 830 Q. No. 15:55

16 A. Because Garda Harrison was still on sick leave and  
17 there was no word as to when he might be back. So I  
18 didn't know when I was going to meet him, but I gave  
19 him every opportunity in my letter to come back to me.  
20 I was anxious to meet him to discuss the investigative 15:55  
21 process, and that's very clear in my letter, and that I  
22 wanted to arrange a meeting with him to discuss it.  
23 And I gave him all my personal mobile and all the  
24 contact details I could, plus a stamped-addressed  
25 envelope to facilitate his contact with me. 15:55

26 831 Q. That form, and you want to correct it because you know  
27 that you can't, in fact, discipline a garda for when he  
28 wasn't in the force, you do appreciate what you are  
29 saying in that form is that I am going to discipline

1 you for every row or disagreement or whatever else  
2 you've had with your partner for 15 years?

3 CHAIRMAN: Okay, we appreciate it's a mistake,  
4 Mr. Harty. It is there.

5 A. Yeah.

15:56

6 MR. HARTY: No, the mistake that was indicated was that  
7 because he wasn't a garda at the time in 1998. I'm  
8 talking about the oppressive nature, even if he had  
9 been a garda, of saying that this is at the time in  
10 1998.

15:56

11 MR. MCGUINNESS: Chairman, I'm wondering how far this  
12 is outside the terms of reference.

13 CHAIRMAN: It's completely outside the terms of  
14 reference, Mr. McGuinness.

15 MR. MCGUINNESS: The other issue is one of --

15:56

16 MR. HARTY: Sorry, I must ask --

17 CHAIRMAN: Mr. Harty, it's usually courteous not to  
18 interrupt people when they are making a submission.  
19 That is what I always learned. Just plain ordinary  
20 courtesy. So what submission do you want to make,  
21 Mr. McGuinness?

15:56

22 MR. MCGUINNESS: Well, a large amount of the  
23 cross-examination to date so far has been to, as it  
24 were, deal with the issue of how or why this witness  
25 delayed. Now, it's the most relevant fact that  
26 Mr. Harty's client in the judicial review proceedings  
27 made that point and succeeded on that point and turned  
28 the witness's delay to his great advantage in stopping  
29 the inquiries that this officer was appointed to

15:57

1 achieve. Now, that is just as may be. But I can't see  
2 how any examination on the question he's being asked  
3 now is in any way relevant to Term of Reference (N).  
4 CHAIRMAN: As I understood the questions put so far in  
5 relation to this issue, it was that the investigation 15:57  
6 should be regarded by the Tribunal as a sham because  
7 there was an appointment but nothing happened.  
8 MR. HARTY: Mm-hmm.  
9 CHAIRMAN: Now an explanation has been given as to why  
10 nothing happened, and essentially the reason was that 15:57  
11 there was an appointment, the papers were there, the  
12 papers needed to be studied then and the date is 15th  
13 May 2014, there was a confidential communication to the  
14 Garda Confidential Recipient. And this officer felt,  
15 well, I can't be seen as harassing this individual so 15:58  
16 I'm going to wait some time and then I'm going to  
17 write, and then she wrote on the 1st December to him  
18 and 16th December to Marisa Simms. Now, that may or  
19 may not be reasonable, but that, I suppose, is an  
20 explanation in the context of effectively her handling 15:58  
21 this matter being called into question. That seems to  
22 be where we are at. So, Mr. Harty, that seems to be  
23 where we are at. Now, if I am getting that wrong, I am  
24 here to be corrected.  
25 MR. HARTY: well, if the Tribunal is satisfied with the 15:58  
26 explanation given by Superintendent Murray, then  
27 certainly cross-examination would serve no purpose.  
28 CHAIRMAN: But sure how do I know? How could I  
29 possibly know? Unless you want to ask the questions,



1 because you certainly raised the issue so far.  
2 Mr. McGuinness's objection was, I'm wondering are we  
3 actually getting to that point. That is all Mr. Harty,  
4 you know.

5 MR. HARTY: We will get to that point. It is a 15:59  
6 relevant matter in relation to the bona fides in  
7 relation to the disciplinary investigation. This is  
8 what arrived on Garda Harrison's desk -- at Garda  
9 Harrison's home on the 1st December, that he was to be  
10 investigated for breach of discipline over a 15-year 15:59  
11 period.

12 CHAIRMAN: Right.

13 MR. HARTY: That is --

14 CHAIRMAN: Let's appreciate that anybody can make a  
15 mistake. But let's suppose, if you wish to put the 15:59  
16 question that this extension back to university days  
17 was malicious, I mean you're perfectly entitled to do  
18 that.

19 MR. HARTY: Yes.

20 CHAIRMAN: But at the moment I think, I suppose, being 15:59  
21 human, one might imagine that other people can make  
22 mistakes as well. But, Mr. Harty you're very welcome  
23 to come to the point because it is very much out there  
24 as to whether this was a malicious investigation and as  
25 to whether Superintendent Murray was taking part in 16:00  
26 that maliciously and effectively didn't take it  
27 seriously at all and that it was just another means of  
28 harassment. That is what I thought the line of  
29 questioning so far was.

1 MR. HARTY: That is where I am going to.

2 832 Q. But in terms of the level of maliciousness in relation  
3 to it, there was nothing in the statement between --  
4 that you read from Marisa Simms --

5 A. No. 16:00

6 833 Q. -- to suggest that there was any behaviour between 1998  
7 and 2010 which could possibly have come within a  
8 disciplinary investigation?

9 A. That's correct.

10 834 Q. But you put in the date -- 16:00

11 A. Yes.

12 835 Q. -- 1998.

13 A. Accidentally. Because I read through Ms. Simms'  
14 statement and read it and read it and I was trying to  
15 find a commencement date and an end date. And 16:00  
16 unfortunately, I selected when the relationship  
17 appeared to have started, which was in 1998.  
18 Unfortunately, that's the date I selected, as opposed  
19 to the date which appeared to be 2010, when the  
20 relationship -- or 2011, when Garda Harrison moved to 16:01  
21 Donegal, when the relationship was rekindled. So it  
22 was incorrect of me to put the 1st October 1998 on  
23 that, and I regret that.

24 836 Q. The situation in relation to your appointment, these  
25 reports which had to be delivered to you by hand had 16:01  
26 been winging their way around Donegal from district to  
27 divisional headquarters and between district on a  
28 fairly frequent basis over the previous two years,  
29 2012/2013; were you aware of that?

1 A. No, I was not.

2 837 Q. They weren't transferred by hand. While they were  
3 marked "confidential", some of them, they were all sent  
4 in the ordinary manner?

5 A. I don't know that. 16:02

6 838 Q. But that is -- that is the case. They were marked  
7 "confidential" but they were all sent in the ordinary  
8 manner.

9 CHAIRMAN: How do you mean in the ordinary manner?

10 MR. HARTY: As in marked "confidential" from one Garda 16:02  
11 station to another. I'm not sure whether that is done  
12 by delivery or whether it is done by post. I presume  
13 it's done by some form of delivery. Certainly it  
14 wasn't a situation whereby when one superintendent was  
15 reporting his confidential report to another, that that 16:02  
16 superintendent felt it necessary to hand-deliver it  
17 himself.

18 CHAIRMAN: Well, I don't know about that, that hasn't  
19 been gone into, but Superintendent Murray knows nothing  
20 about how people in Donegal communicate with each 16:02  
21 other.

22 MR. HARTY: Well, except that --

23 CHAIRMAN: I have heard nothing about it so far.

24 MR. HARTY: I think it would have been perfectly clear,  
25 because the words used by people, that they sent 16:02  
26 things, would suggest that they themselves did not  
27 transport and that was the evidence, and the issue was  
28 to arise in relation to that, and it is an issue in  
29 relation to the evidence of Superintendent Murray, that

1 Chief Superintendent McGinn arranged a one-to-one  
2 meeting in relation to this, and your evidence is  
3 because these were confidential reports.

4 A. Well, there is a lot of sensitive information in the  
5 file and I noticed that when I received it, yes. 16:03

6 839 Q. And there's a lot of irrelevant material in the file,  
7 isn't there?

8 A. There was background material on the file.

9 840 Q. A lot of irrelevant material in the file?

10 A. Well, it -- before I got my appointment, I knew nothing 16:03  
11 about Garda Harrison.

12 841 Q. I appreciate you knew nothing about it.

13 A. And I knew nothing about the issues here. So the  
14 documents in the file related to the threats, related  
15 to the threats on Mr. Harrison. 16:03

16 842 Q. Garda Harrison?

17 A. Garda Harrison and Ms. Simms, by her -- by Mr. Simms,  
18 and it related to identify the threats on Garda  
19 Harrison and the action that was taken on foot of that,  
20 identify the referral to Tusla and the statements from 16:04  
21 Ms. Simms, the two statements from Ms. Simms and her  
22 mother. So they were important --

23 CHAIRMAN: No, I understand. Forgive me for just  
24 coming in again, but in relation to any mention of  
25 Marisa Simms' husband, there were two views taken as to 16:04  
26 that, as to whether there ever was a threat, and the  
27 Gardaí formed the view that it was just a domestic  
28 upset, so it's just best I mention that there, because  
29 I don't want him to be pulled into this. He was simply

1 an upset husband, as far as I can see.

2 843 Q. MR. HARTY: How long was your meeting with Chief  
3 Superintendent McGinn?

4 A. Roughly about 25 minutes, because she had come from  
5 another event. I was after leaving an event in Sligo. 16:04  
6 She was heading towards another, another event  
7 afterwards, so there was a very tight time-line, so  
8 roughly about 25 minutes.

9 844 Q. So I take it you didn't read Ms. Simms' statement?

10 A. No. Chief Superintendent McGinn just opened it up and 16:05  
11 said there's a number of different incidents here, over  
12 a number of different months, they're very much  
13 domestic related, there's children involved. She  
14 didn't go into the whole ins and outs of the statement  
15 because we didn't have time to do that. 16:05

16 845 Q. Did she go through the individual documents as they  
17 came up to point out to you what they were?

18 A. Not them all.

19 846 Q. Not them all?

20 A. No. 16:05

21 847 Q. Because amongst the documents that she handed to you  
22 was the anonymous letter of January 2012?

23 A. That was in the file, yes.

24 848 Q. Yeah.

25 A. But I can't say there was any discussion about that 16:05  
26 anonymous letter, because we were looking at a  
27 20-something page statement of Ms. Simms.

28 849 Q. It's just that Chief Superintendent McGinn gave  
29 evidence that she didn't see that anonymous letter

1 before March of this year.

2 A. She may not have seen it on that file either, you know.  
3 I don't know. But we went there that 20-something page  
4 statement, not every line of it, not every page. But  
5 quite a number of the pages. 16:06

6 850 Q. So Chief Superintendent McGinn didn't know what she was  
7 handing to you?

8 A. Well, I presume that the file was prepared by personnel  
9 in her office and presented to her for delivery to me.  
10 I'm sure she didn't prepare the file, she didn't 16:06  
11 prepare all the documents herself and staple them and  
12 deliver them. I assume that was done by her staff.

13 851 Q. So she didn't determine what was to be in the document,  
14 she was just the courier?

15 A. Pardon? 16:06

16 852 Q. She was just the courier, is that it?

17 A. Well, I cannot say that. She delivered the file to me  
18 in Blacklion on 19th February at 3:00pm.

19 853 Q. And you made no note in your officers journal in  
20 relation to it? 16:07

21 A. I recorded the meeting as taking place.

22 854 Q. But not in your officers journal, in your diary?

23 A. In my diary.

24 855 Q. You then received two reminders, in relation to it, to  
25 which you didn't reply. Did you see Chief 16:07  
26 Superintendent McGinn at all between February and  
27 December of 2014?

28 A. I would have met Chief Superintendent McGinn at  
29 different regional meetings or conferences, possibly on

1 maybe three occasions in that period of time.

2 856 Q. Did she raise this matter with you?

3 A. To be fair to the chief superintendent she did.

4 Because she was conscious, I suppose, that she had

5 received the reminders from chief superintendent 16:07

6 Internal Affairs and she had sent them on to me

7 obviously for a response and she asked me how I was

8 getting on. So I --

9 857 Q. What did you say?

10 A. I had said well, I haven't managed to serve the 16:08

11 paperwork on Garda Harrison yet, in particular since

12 14th May and the fact that he was still off sick.

13 858 Q. Did you mention the 14th May as being an issue?

14 A. I did. Yeah. But it was common knowledge, the 14th

15 May issue was common knowledge. 16:08

16 859 Q. And --

17 A. You know, and I'm not sure that there is a process that

18 sits alongside somebody who has entered the

19 confidential recipient process and the management of

20 any disciplinary or criminal investigations relative to 16:08

21 that individual.

22 860 Q. You are aware that the criminal investigation was

23 entered on the Pulse as closed in the summer of 2014?

24 A. I was not aware of that until this Tribunal.

25 861 Q. Did Chief Superintendent McGinn tell you that at any 16:08

26 stage?

27 A. No, I wasn't aware of that.

28 862 Q. So when you were being asked to carry out a criminal

29 investigation that was already closed?

1 A. I wasn't aware of that. The criminal investigation,  
2 the investigation I was given, I could see clearly the  
3 rationale for it. When I received it, I did identify a  
4 number of difficulties with it, in terms of some of  
5 the -- I received my appointment in February, 10th 16:09  
6 February, some of the incidents recorded in that  
7 statement were five months old at that point, and if  
8 we're looking at section 2 assault that has a six month  
9 statutory timeframe on it. There was the incident in  
10 Athlone as well in 2012 I think, in June 2012. There 16:09  
11 was an incident in Athlone.

12 863 Q. After Athlone is in 2012?

13 A. Yes. But that incident is, that incident is recorded.  
14 There's an incident in June 2012 recorded in that  
15 statement that would need to have been looked at, but 16:10  
16 that might possibly have been maybe statute barred at  
17 that time. I was conscious of the fact that Ms. Simms  
18 had made a statement of withdrawal as well, and that  
19 Ms. Simms had also decided not to, I suppose, engage  
20 with GSOC and she had withdrawn her, I suppose, 16:10  
21 cooperation with the Gardaí. But at the same time I  
22 was conscious that Garda Harrison, that the allegations  
23 in Ms. Simms' statement, that Garda Harrison needed to  
24 know about them, needed to be aware of them and  
25 obviously needed to give his version of events, in 16:10  
26 whatever process or whatever way he wished to do that.

27 864 Q. In fact, in relation to most of the criminal matters  
28 contained in the statement effectively, aside from the  
29 threats, which might have been, if seriously taken,



1 indictable, I think many of the incidents were in fact  
2 summary, isn't that correct?

3 A. There were a number of -- I extracted the incidents --  
4 865 Q. We won't go through them.  
5 A. -- from the statement. 16:11

6 866 Q. We won't go through them in detail.  
7 A. But some of them were still live, for want of a better  
8 word --

9 867 Q. Yes?  
10 A. -- and were still valid. 16:11

11 868 Q. Mm-hmm.  
12 A. The Rock Bar incident.

13 869 Q. What are you looking at there?  
14 A. I just said, I extracted from Ms. Simms' statement, I  
15 listed -- 16:11

16 870 Q. When did you extract that?  
17 A. I beg your pardon?

18 871 Q. When did you extract that?  
19 A. Just in the last few days.

20 872 Q. Oh well, we don't need to be referring to that, thank  
21 you. 16:11

22 A. Okay. Well, I don't need to refer to it --

23 873 Q. No.  
24 A. -- in terms of some of the incidents there were still  
25 live and some of them would appear to have been outside 16:11  
26 the statutory timeframe.

27 874 Q. Would it be the practice in the Sligo-Leitrim division  
28 where there are serious live threats to kill out  
29 against a person for them not to be investigated

1 immediately?  
2 CHAIRMAN: Which now are these? The once against  
3 or by?  
4 MR. HARTY: No, either.  
5 875 Q. No, I'm talking about in Sligo-Leitrim, is it the 16:12  
6 practice not to investigate threats to kill?  
7 A. Sorry, I missed the last part.  
8 876 Q. Is it the practice in the Sligo-Leitrim division not to  
9 investigate threats immediately?  
10 A. No, it's not. 16:12  
11 877 Q. I take it in the Sligo-Leitrim division if a threat to  
12 kill has any credence attached to it, it would be  
13 investigated immediately?  
14 A. Well, obviously you just don't launch into a full-blown  
15 investigation straightaway, you make your inquiries, 16:12  
16 with this one, whoever has relevant information and the  
17 threat is assessed --  
18 878 Q. Yes?  
19 A. -- before a full scale investigation takes place, if it  
20 is necessary. 16:12  
21 879 Q. No, you assess the threat, if the threat is believed to  
22 be real and credible you then --  
23 A. Substantial.  
24 880 Q. And substantial.  
25 A. Substantial. 16:12  
26 881 Q. Substantial is perhaps a good word. You would take it  
27 seriously and investigate it quickly, I take it?  
28 A. Yes.  
29 MR. HARTY: I don't think I have any further questions

1 thank you, Superintendent Murray.

2 MR. BARNES: Sorry, I have no questions, thank you.

3 MR. MCDERMOTT: No questions.

4 MR. DOCKERY: No questions, Judge.

5 MR. DIGNAM: I just have a few brief questions,  
6 Chairman, and I will be very brief.

16:13

7

8 SUPERINTENDANT MURRAY WAS CROSS-EXAMINED BY MR. DIGNAM

9 AS FOLLOWS:

10 882 Q. MR. DIGNAM: Superintendent Murray, you've clearly  
11 thought a lot about this case and the investigation  
12 that you were asked to carry out and your failure to  
13 carry out the investigation, you've thought about that  
14 a lot I presume?

16:13

15 A. Yes.

16:13

16 883 Q. And I think you have accepted, both in affidavit and  
17 indeed at the Tribunal you have accepted responsibility  
18 for not having carried it out within a reasonable  
19 practicable timeframe?

20 A. Yes. Despite my thought process and my rationale at  
21 the time, you know, I really should have written to  
22 Garda Harrison in the very -- really within the first  
23 two or three days of receiving my appointment. And the  
24 difficulties I suppose that ensued or the circumstances  
25 which ensued later on, which appear to me to cause a  
26 difficulty, they would not have arisen at that point.  
27 Because I appreciate it did look to Garda Harrison when  
28 he received my documentation that Chief McGinn was  
29 possibly only after initiating this, appointing me to

16:14

16:14

1 do this investigation, whereas in reality she had  
2 appointed me in February.

3 884 Q. Yes.

4 A. Before he entered the confidential recipient process.

5 885 Q. And you've not only had to account to this Tribunal for 16:14  
6 the delay and the failure to carry out the  
7 investigation, but you also had to account to the High  
8 Court in the context of those judicial review  
9 proceedings, isn't that right?

10 A. That's correct, yes. 16:14

11 886 Q. Yes.

12 A. The application was conceded on the grounds of  
13 inordinate delay.

14 887 Q. And in answer to Mr. Harty's questions about where 16:14  
15 you're getting the information about the number of days  
16 that Garda Harrison had worked in that period of time,  
17 in February, March and April, into May, you had  
18 provided that information by way of affidavit in the  
19 High Court, isn't that right?

20 A. That's correct. 16:15

21 888 Q. Yes. Just to go back to that period very briefly, why  
22 did you want to meet Garda Harrison? Because I think  
23 you said that you could have simply written to him to  
24 tell him of your appointment.

25 A. Well, that's normally what I do, you know. Because 16:15  
26 telling somebody or just receiving a letter in the post  
27 to say that you're now subject to a disciplinary  
28 investigation, in particular criminal, it's a bit  
29 impersonal and invariably the member who is being

1 investigated has a lot of questions to ask, they have a  
2 lot of concerns, they are worried, how it's going to  
3 affect their job, how it's going to affect their  
4 family, so I always like to personally meet the Garda  
5 member. And all the more so in this particular 16:15  
6 instance, because I was in possession of the statements  
7 from Ms. Simms, I knew there were difficulties in the  
8 home and I couldn't very well land at the home and say  
9 to Garda Harrison -- I felt, say to Garda Harrison  
10 actually Ms. Simms has made a statement and I have been 16:16  
11 appointed to investigate it from a criminal perspective  
12 and, by the way, here's a form IA32, I have also been  
13 appointed to investigate it from a discipline  
14 perspective. I felt in all reasonableness that that  
15 was not the appropriate approach for me to take. 16:16  
16 889 Q. Yes. Now I think the Tribunal has been furnished with  
17 a copy of the order in the judicial review proceedings,  
18 but am I correct in saying that the ground upon which  
19 the judicial review stopped proceedings was delay and  
20 only delay? 16:16  
21 A. That's correct, yes.  
22 890 Q. And then finally, when you wrote to Marisa Simms I  
23 think on the 15th?  
24 A. On the 16th I think it was.  
25 891 Q. 16th December? 16:16  
26 A. Of December, yes.  
27 892 Q. The judicial review proceedings had been launched the  
28 previous day, is that correct?  
29 A. Yeah, that's correct. But I wasn't aware of that.

1 893 Q. Yes. That's what I was going to ask you; you weren't  
2 aware of it?

3 A. I wasn't aware of that. If I was, obviously I wouldn't  
4 have written the letter to Ms. Simms.

5 MR. DIGNAM: Thank you superintendent Murray. 16:17  
6

7 MS. LEADER: Nothing arising, so thank you,  
8 superintendent.

9 A. Okay. 16:17  
10

11 SUPERINTENDANT MURRAY WAS THEN QUESTIONED BY THE  
12 CHAIRMAN, AS FOLLOWS:

13 894 Q. CHAIRMAN: Sorry, superintendant, one of the questions  
14 you were asked, was reading the statement did you think  
15 that the threats to kill were substantial or not; did 16:17  
16 you have a view on that?

17 A. I did read the file, the statements, and it was clear  
18 that -- I felt myself that there were threats there,  
19 that they were clear threats, that there was a bit of  
20 harassment in the statement, that there was assaults in 16:17  
21 the statement, and I felt that my appointment was  
22 appropriate. But the threats, I felt, yeah, that there  
23 was a threat there. I mean, we know now in hindsight  
24 when everything has been clarified the wording that was  
25 used about burning, you know that that maybe is not 16:17  
26 what the person meant to say or understood that that is  
27 what the person said. But, you know, when you read the  
28 statement and you're relying -- which is all I had to  
29 rely on, was the statement from Ms. Simms and her

1 mother.

2 895 Q. CHAIRMAN: Yes.

3 A. It seemed to me as if there was a threat there.

4 896 Q. CHAIRMAN: And if people had explained things to you,  
5 you would have taken that into account, I suppose. 16:18  
6 Like, if the explanation had a been given in relation  
7 to the burning, whether you accepted it or not, you  
8 would at least have considered it?

9 A. Yeah. Well, I suppose that was Garda Harrison's  
10 opportunity, when I wrote to him, it was his 16:18  
11 opportunity to come back to me and explain to me in  
12 whatever format he wanted to do that, I was open to it,  
13 to say 'well, actually that's not what I said' or  
14 'that's not what I meant', you know.

15 CHAIRMAN: Very well. Thank you very much. 16:18

16 A. Thank you Chairman.

17

18 THE WITNESS THEN WITHDREW

19

20 MR. MCGUINNESS: Chairman, that is the last witness 16:18  
21 that we have scheduled for today. Arising from some  
22 inquiries which we were making we may have an  
23 additional document or perhaps two additional documents  
24 to circulate just by way of disclosure. So, I was  
25 going to suggest, Chairman, that you would rise and sit 16:19  
26 at normal way in the normal way at 10:00 in the  
27 morning.

28 CHAIRMAN: Are they important, do you think ?

29 MR. MCGUINNESS: It's difficult to say.

1 CHAIRMAN: All right. We have will a look at it.  
2 Let's just think about submissions then. Who would  
3 like to make submissions first?  
4 MR. HARTY: I must admit my general opinion of  
5 submissions is much the same as the Tribunal's; in that 16:19  
6 the Tribunal has heard the evidence and submissions on  
7 the evidence are perhaps of limited value. Certainly  
8 if the Tribunal wishes me to make submissions I can but  
9 I don't know that I need to make an oral submission to  
10 the Tribunal. And certainly, if I was, I wouldn't 16:19  
11 propose to go into any detail in relation to it.  
12 CHAIRMAN: All right. Thanks, Mr. Harty. I will come  
13 back, but just when I have heard from everybody else  
14 and, Mr. Barnes, would you want to make a submission?  
15 MR. BARNES: I am in a similar position but I will 16:20  
16 consider the position overnight.  
17 CHAIRMAN: Yes. And then, Mr. McDermott --  
18 MR. BARNES: Thank you.  
19 CHAIRMAN: -- did you want to make a brief submission?  
20 MR. MCDERMOTT: I think can I make one in two minutes 16:20  
21 about the position of Tusla.  
22 CHAIRMAN: Yes. And then --  
23 MR. DOCKERY: Well, I understand that you would like a  
24 submission, Chairman, but I would appreciate a chance  
25 to just prepare one overnight and be very brief in the 16:20  
26 morning.  
27 CHAIRMAN: Yes. And Mr. Power, I'm sorry  
28 Mr. Ó Braonáin?  
29 MR. Ó BRAONÁIN: I would think about two minutes.



1 CHAIRMAN: Yeah. And similarly the Garda  
2 Commissioner's team.

3 MR. DIGNAM: Similarly, Chairman. We would only  
4 propose to make submissions if they be of assistance to  
5 the Tribunal or if the Tribunal would feel they would 16:20  
6 be of assistance, but if they are to be made, I think  
7 the Tribunal has made its view very clear in relation  
8 to the length they should be and we will keep them very  
9 short.

10 CHAIRMAN: Yes. And I think we have said in our 16:20  
11 explanation that it has never happened in a tribunal  
12 that counsel for the tribunal actually makes a  
13 submissions, so we wouldn't be. Maybe it would just  
14 help at the moment, we have a little bit of time, just  
15 to briefly run through what might turn out to be 16:21  
16 turning points.

17  
18 So as I understand it, January 2011, Keith Harrison and  
19 Marisa Simms start a relationship and then in February  
20 2011 Keith Harrison applies for a swap transfer and 16:21  
21 goes to Buncrana on 15th March 2011. And then on 23rd  
22 May 2011 there is the incident, the Simms upset husband  
23 at Churchill. And then on the Buncrana Gardaí learn of  
24 the connection between Keith Harrison and Marisa Simms  
25 and the connection to Martin McDermott. Now, an issue 16:21  
26 that might arise there is as to whether or not that was  
27 genuine or not genuine and as to whether or not Keith  
28 Harrison should have notified of this connection prior  
29 to going to Buncrana.

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

Then on the 30th May he was transferred to Donegal Town; so an issue which might arise there is whether that was a genuine matter or was in some way maliciously engineered by the Gardaí.

16:22

On the 11th November, again we're in 2011, he applied for a transfer to Letterkenny and this was refused by Chief Superintendent Terry McGinn; an issue again which may arise there is whether that was done bona fide, pursuant to the proper organisation of the force or was part of a plan to annoy him.

16:22

In Donegal Town then during this period of time he claims that he was being bullied, and whether that happened or not would seem to feed into whether or not people had a problem with him and sought, therefore, to pursue the powers which they had for a purpose for which they were not given.

16:22

Then on the 9th February 2012 the anonymous letter comes to the HSE and is passed over to Sergeant McGowan. There seems to be an issue there as to whether she was right to take a copy of it and whether this anonymous letter was gathered in and was being used in relation to a head of malice, as I think has been put earlier on, probably by me, that was allegedly building up in relation to Keith Harrison.

16:22

16:23

1 Then on the 13th February 2012 there is the searching  
2 of Marisa Simms' address on Pulse - 17 inquiries. I  
3 understand there was others as well, which have only  
4 been mentioned tangentially, in relation to the actual  
5 car registration number as opposed to her or her 16:23  
6 address. As to whether that was wise, whether  
7 discipline should have resulted from that or not, is an  
8 issue. And specifically 24th April 2012, whether Chief  
9 Superintendent Sheridan and Keith Harrison met in  
10 relation to that Pulse matter. I understand it's 16:23  
11 accepted that there was a meeting, the allegation by  
12 Garda Keith Harrison is that was an angry meeting but  
13 that the issue of Pulse was never met. So I have to  
14 resolve that fact one way or another. And if was an  
15 angry meeting and it wasn't one which mentioned Pulse, 16:24  
16 was it evidence of again this malice building up.

17  
18 And then we come to June 2012, and I understand Marisa  
19 Simms was actually in a house with Keith Harrison, and  
20 then there is the issue as to what happened in relation 16:24  
21 to the Junior Certificate - if I have things right, it  
22 is the Junior Certificate - exam paper, alleged threat  
23 about smoke or burning, there are various things on  
24 this and I have to resolve these one way or the other.  
25 There's some witnesses on that. 16:24  
26

27 1st April 2013, the Jim Bogle incident has been  
28 referred to. This is the first time, it is alleged,  
29 that Marisa Simms was asked to leave the house, if I

1 can put that as neutrally as possible. Was there two  
2 trips by Jim Bogle in those circumstances or was there  
3 only one? What was the involvement of Rita McDermott  
4 in Mayo? Was this genuine or was too much made out of  
5 it?

16:25

6  
7 Now, in May 2013 I understand that Keith Harrison  
8 pleaded guilty in Manorhamilton District Court to a  
9 charge of no insurance, as to whether that is part of  
10 the bullying alleged against Sergeant Durkin or is not,  
11 is an issue that has to be looked at.

16:25

12  
13 Then we go to the 17th May 2013, there was a car crash.  
14 And again, it is not to be blamed on Keith Harrison.  
15 He goes sick and works only one day up to being put on  
16 indoor duties on his return, which is then after the  
17 statement. I'm not sure that that is in any way  
18 relevant.

16:25

19  
20 As I understand it then we have the unfortunate ectopic  
21 pregnancy, it is not something to be gone into, but it  
22 is part of the strain, in June 2013.

16:25

23  
24 In July, on 6th July 2013, there is the winning streak  
25 matter.

16:26

26  
27 On Wednesday, 21st August Rita McDermott picks up  
28 Marisa Simms in her pyjamas. The texts there may be  
29 relevant. As to what happened there perhaps needs to

1 be resolved.

2  
3 There is a proposal then, as I understand it, reported  
4 at least in the Gardaí, that Marisa Simms put his  
5 belongings outside the house, as to how and whether  
6 that happened may be relevant. 16:26

7  
8 On the 23rd August 2013 there is a video of Keith  
9 Harrison standing with his arms folded in relation to  
10 the car. As to what interpretation is to be put on 16:26  
11 that is a matter that may be of interest.

12  
13 24th August 2013, the phone call by Rita McDermott to  
14 Donegal Town.

15 16:26  
16 30th/31st August was the hen night in Westport and as  
17 to whether anything is to be made of that or any Garda  
18 inquiries I don't know.

19  
20 24th September 2013, Rita McDermott again goes to 16:27  
21 Donegal Town and speaks to Sergeant Durkin.

22  
23 27th September, Chief Superintendent McGinn appoints  
24 Inspector Sheridan to investigate these matters, having  
25 had a report from Sergeant Durkin on the Bogle incident 16:27  
26 and the September incident as well.

27  
28 And the next matter is the 28th September. I'd like to  
29 know whether I have to resolve exactly what happened in

1 relation to the alleged burn threat.

2  
3 And then 30th September, Paula McDermott came to  
4 Letterkenny and Marisa Simms is supposed to have gone  
5 to the house where she had left and spoke to Keith 16:27  
6 Harrison, who is supposed to be agitated and begged her  
7 not to proceed with a report.

8  
9 On the 1st October Rita McDermott and Sergeant Durkin  
10 spoke on the phone. 16:28

11  
12 On 2nd October 2013 Inspector Sheridan and Sergeant  
13 Collins took a statement from Rita McDermott. The  
14 issue there seems to be whether that was genuinely  
15 taken or not genuinely taken and whether the contents 16:28  
16 of that statement can be relied on in the context of  
17 the evidence. Whether there was an ulterior motive  
18 perhaps by family members in relation to the wedding  
19 which was forthcoming. On the 4th October 2013 there's  
20 the wedding of Paula McDermott and death threat to 16:28  
21 Keith Harrison. How seriously these were taken may be  
22 an issue. But how, it is difficult to say at this  
23 point.

24  
25 The 6th October is the statement of Marisa Simms in 16:28  
26 Letterkenny. Now as to whether Chief Superintendent  
27 McGinn, Inspector Sheridan and Sergeant McGowan  
28 engineered a situation where that statement was to be  
29 taken from her, whether pressure was put by Inspector

1 Sheridan in terms of getting her into the Garda station  
2 and taking the statement, how the statement was taken,  
3 the extent to which it is her words or words put into  
4 her mouth or whether she was suggestible is an issue  
5 which arises from that day.

16:29

6  
7 Then on the 7th October Sergeant Wallace spoke to Keith  
8 Harrison in Churchill and we have evidence in relation  
9 to that and what was said, in particular whether  
10 certain notes that he made in relation to the HSE can  
11 be relied on or not.

16:29

12  
13 On the 8th October there's the business meeting in  
14 Letterkenny. Marisa Simms is then in hospital. As I  
15 understand it, the issue that will arise there is  
16 whether or not the referrals made to GSOC, made to the  
17 HSE, which is now Tusla, and the various steps in  
18 investigation were taken in good faith or were not  
19 taken in good faith.

16:29

20  
21 Then on the 9th October we have the GSOC contact with  
22 Marisa Simms. By that stage I think Keith Harrison had  
23 been put on indoor duties. He may have worked I think  
24 the next day, 10th October. Chief Superintendent  
25 McGinn wrote on that day to headquarters suggesting  
26 suspension of Keith Harrison or a transfer of him out  
27 of Donegal, and the reply and the genuineness of any of  
28 that is in issue before the Tribunal.

16:30

1 On the 11th October Marisa Simms asks GSOC can she  
2 stop, and, as I understand it, Superintendent McGovern  
3 notes in his diary from Sergeant McGowan that it is  
4 possible that the couple are back together.

16:30

5  
6 On the 15th October, this is the email to stop GSOC  
7 from Marisa Simms, perhaps the issue arises as to why  
8 there was that delay in relation to that week or so  
9 before doing it. It could be explicable in a number of  
10 ways perhaps.

16:30

11  
12 On 6th November Mr. Wright of GSOC rings Superintendent  
13 McGovern to say the GSOC matter is over. So that feeds  
14 into whether this GSOC referral was genuine, as to  
15 whether Marisa Simms knew that it might be made.

16:31

16  
17 On the 11th January 2014 Marisa Simms withdraws the  
18 statement to Inspector Sheridan and the issue there  
19 seems to be whether there was a pre-prepared statement,  
20 which is the allegation in her statement to the  
21 Tribunal, which was not quite given in evidence before  
22 me, but it seems to have turned now into an issue as to  
23 whether or not words were made up, and, to use the  
24 colourful phrase put to Inspector Sheridan in  
25 cross-examination, whether this Garda prose is to be  
26 attributed to her or whether the substance of it is  
27 what she wanted to do.

16:31

16:31

28  
29 Then in February Sergeant Mary Murray, Sligo, was



1 instructed to investigate and as I understand it the  
2 precise date of that 19th February. As to whether that  
3 was a genuine matter or whether it was a charade is  
4 something which comes into being.

16:32

5  
6 Then going onto the Tusla matter, there is of course  
7 the letter from Tusla on the 2nd February. Now  
8 skipping over that, as I understand it, the allegation  
9 that has been made before the Tribunal is as to whether  
10 or not the Tusla matter had literally ground to a halt  
11 but was revived in some way by the Gardaí for improper  
12 purposes. The evidence in that regard will have to be  
13 sorted out in the context of the documents. If anyone  
14 wants to make a comment on that they may.

16:32

15  
16 Then on the 7th February there's the office encounter  
17 with Donna McTeague; certain things were put, perhaps  
18 certain things weren't understood, but there are notes  
19 there, the extent to which they can be relied on is  
20 important.

16:32

21  
22 On 24th February Donna McTeague rings to arrange a home  
23 visit with Keith Harrison and the extent to which that  
24 was genuine or was motivated by Garda pressure is an  
25 issue, and if people want to make that case they should  
26 perhaps explicitly make that case, but that is what I  
27 have been concentrating on.

16:32

28  
29 Then on the 19th February there's the home visit. Now

1 what is important about that is that Donna McTeague  
2 came in, introduced to the children as a friend, she  
3 was there in friendly circumstances but it is alleged,  
4 it's still alleged, that she claimed she didn't want to  
5 be there and that pressure was put on her higher 16:33  
6 officers in order to force her to be there by the  
7 Gardaí and she saw no necessity to be there. And that  
8 allegation is maintained, I'm going to have to resolve  
9 that one way or the other.

10  
11 Then on 9th May there is discussions with Sergeant  
12 Durkin by Keith Harrison in relation to his state of  
13 happiness or unhappiness in Donegal Town.

14  
15 On 15th May Keith Harrison became a whistleblower. 16:33  
16 Now, to my mind that is irrelevant. If someone is  
17 ordained a priest that doesn't necessarily mean that  
18 they're a person of the highest virtue. It's simply an  
19 example. But the point is that it happened at that  
20 particular point, how that feeds into anything I don't 16:34  
21 know.

22  
23 Then we have heard the evidence of Superintendent Mary  
24 Murray as to why she delayed. We have heard that the  
25 interim there were a number of letters in relation to 16:34  
26 that matter, we have heard her evidence in relation to  
27 that.

28  
29 Then on 10th February 2017 there is the very explicit

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

letter to Minister Zappone, which is at page 1579 of the documents, which makes allegations which it seems to me at the very least I should resolve.

So that has been the course of evidence over the Tribunal and those seem to me to be the various things that I am interested in. If people want to add to that or make a brief submission that you should resolve a particular fact a particular way, I would be very glad to hear that. But maybe the right thing to do is to go on to that in the morning unless anybody has anything to say. All right. Thank you.

THE TRIBUNAL THEN ADJOURNED UNTIL WEDNESDAY, 11TH  
OCTOBER 2017 AT 10:00AM

	99:21, 101:6, 101:7, 101:22, 101:23, 102:5, 102:9, 102:21, 103:16, 103:21, 104:8, 104:9, 104:21, 104:29, 105:1, 105:4, 105:13, 108:12, 109:15, 111:7, 111:8, 112:4, 112:15, 112:22, 114:18, 115:7, 115:10, 180:4	<b>13th</b> [1] - 219:1 <b>14</b> [3] - 184:1, 185:3, 185:15 <b>148</b> [1] - 4:30 <b>14th</b> [5] - 194:25, 195:29, 207:12, 207:13, 207:14 <b>14th/15th</b> [1] - 197:3 <b>15</b> [2] - 57:29, 199:2 <b>15-year</b> [1] - 201:10 <b>15/2/05</b> [1] - 165:10 <b>1579</b> [1] - 227:1 <b>1588</b> [2] - 143:13, 156:11 <b>159</b> [1] - 4:31 <b>15th</b> [7] - 194:25, 195:29, 200:12, 213:23, 217:21, 224:6, 226:15 <b>16</b> [1] - 1:6 <b>1607</b> [1] - 71:20 <b>1609</b> [2] - 75:14, 88:2 <b>1611</b> [2] - 76:28, 76:29 <b>1612</b> [1] - 89:11 <b>1614</b> [1] - 81:1 <b>1615</b> [2] - 109:11, 109:13 <b>1622</b> [1] - 27:20 <b>1624</b> [1] - 23:23 <b>1626</b> [1] - 25:16 <b>1628</b> [1] - 26:9 <b>163</b> [1] - 4:32 <b>164</b> [2] - 5:1, 5:2 <b>16th</b> [4] - 188:16, 200:18, 213:24, 213:25 <b>17</b> [2] - 1:10, 219:2 <b>170</b> [1] - 5:3 <b>1703</b> [1] - 58:11 <b>175</b> [1] - 5:4 <b>176</b> [1] - 5:6 <b>17th</b> [1] - 220:13 <b>18</b> [2] - 116:18, 116:20 <b>18:50</b> [1] - 72:21 <b>18th</b> [1] - 164:26 <b>1921</b> [1] - 1:10 <b>193</b> [2] - 5:7, 5:8 <b>1956</b> [1] - 117:9 <b>1981</b> [1] - 177:2 <b>1982</b> [1] - 32:10 <b>1983</b> [1] - 32:11 <b>1985</b> [1] - 116:11 <b>1986</b> [2] - 32:13, 116:11 <b>1988</b> [1] - 177:5 <b>1990</b> [2] - 32:15, 177:8	<b>1993</b> [2] - 116:13, 177:12 <b>1994</b> [1] - 32:16 <b>1995</b> [2] - 32:19, 32:21 <b>1996</b> [2] - 177:10, 177:12 <b>1997</b> [2] - 116:16, 116:18 <b>1998</b> [8] - 188:7, 188:12, 199:7, 199:10, 202:6, 202:12, 202:17, 202:22 <b>19th</b> [8] - 178:27, 182:9, 193:8, 195:28, 197:3, 206:18, 225:2, 225:29 <b>1A32</b> [1] - 187:7 <b>1st</b> [10] - 180:17, 185:10, 186:11, 188:12, 198:9, 200:17, 201:9, 202:22, 219:27, 222:9	217:20, 217:21, 217:22, 218:7 <b>2012</b> [11] - 7:21, 181:1, 205:22, 208:10, 208:12, 208:14, 218:21, 219:1, 219:8, 219:18 <b>2012/2013</b> [1] - 202:29 <b>2013</b> [35] - 8:4, 31:1, 33:3, 33:6, 33:28, 35:12, 47:29, 53:12, 57:3, 61:24, 65:10, 71:17, 72:21, 109:2, 116:25, 117:6, 117:13, 118:27, 126:29, 178:15, 179:19, 179:23, 180:10, 180:17, 187:22, 219:27, 220:7, 220:13, 220:22, 220:24, 221:8, 221:13, 221:20, 222:12, 222:19 <b>2014</b> [17] - 1:4, 177:26, 178:23, 184:7, 185:10, 191:22, 191:25, 192:5, 192:9, 192:10, 192:17, 193:8, 198:10, 200:13, 206:27, 207:23, 224:17 <b>2015</b> [7] - 52:9, 54:14, 55:5, 55:18, 189:18, 190:3, 190:17 <b>2016</b> [3] - 54:12, 54:28, 55:2 <b>2017</b> [7] - 1:6, 1:10, 1:18, 6:2, 184:25, 226:29, 227:15 <b>2090</b> [1] - 176:23 <b>2095</b> [2] - 178:8, 179:3 <b>20:48</b> [1] - 156:9 <b>20:50</b> [1] - 143:14 <b>20:50:35</b> [1] - 144:17 <b>20:51</b> [1] - 143:14 <b>20:51:38</b> [1] - 143:14 <b>21</b> [8] - 2:25, 123:11, 123:26, 124:9, 124:16, 124:25, 130:23, 149:14 <b>211</b> [1] - 5:9 <b>2120</b> [1] - 179:18 <b>2122</b> [1] - 179:21 <b>2127</b> [2] - 180:2, 180:7 <b>2131</b> [1] - 180:12
<hr/> <b>1</b> <hr/>	98:27, 99:6, 99:8 <b>103</b> [1] - 80:24 <b>105</b> [4] - 22:19, 22:21, 100:5, 100:11 <b>1065</b> [1] - 116:4 <b>1067</b> [2] - 123:19, 123:27 <b>1069</b> [1] - 126:23 <b>107</b> [1] - 4:24 <b>1070</b> [1] - 131:7 <b>1073</b> [1] - 164:19 <b>1076</b> [1] - 176:12 <b>10:00</b> [3] - 147:1, 147:3, 215:26 <b>10:00AM</b> [1] - 227:15 <b>10TH</b> [2] - 1:18, 6:1 <b>10th</b> [15] - 27:26, 47:11, 49:9, 52:9, 53:7, 54:14, 55:14, 55:18, 165:17, 177:26, 178:22, 194:11, 208:5, 223:24, 226:29 <b>110</b> [1] - 4:25 <b>116</b> [2] - 4:27, 4:28 <b>11TH</b> [1] - 227:14 <b>11th</b> [6] - 108:25, 123:2, 190:3, 218:7, 224:1, 224:17 <b>12</b> [2] - 2:30, 24:21 <b>12/9/97</b> [1] - 164:29 <b>120/04</b> [1] - 46:7 <b>12:35</b> [4] - 71:11, 71:18, 71:21, 114:13 <b>12:45</b> [2] - 72:4, 114:14 <b>12th</b> [1] - 179:23 <b>13</b> [1] - 127:2 <b>1300</b> [3] - 74:2, 74:6, 74:11 <b>133</b> [1] - 4:29 <b>1382</b> [1] - 118:14	<b>1</b> [5] - 134:1, 135:9, 178:29, 179:9, 188:2 <b>1-2</b> [1] - 3:5 <b>1/3</b> [1] - 185:7 <b>10</b> [6] - 57:29, 99:6, 114:7, 114:10, 114:12, 115:8 <b>10/10</b> [8] - 66:19, 67:26, 68:10, 86:15, 86:18, 86:19, 87:1, 87:2 <b>100</b> [5] - 4:23, 8:23, 46:2, 99:7, 115:7 <b>102</b> [112] - 8:3, 8:6, 8:18, 8:28, 10:5, 10:8, 11:1, 11:2, 11:14, 11:19, 11:20, 11:22, 12:1, 12:5, 12:10, 15:26, 16:2, 16:5, 25:2, 27:13, 27:18, 27:29, 28:4, 28:11, 28:16, 28:17, 38:8, 38:18, 38:20, 44:8, 44:13, 44:20, 44:29, 45:13, 45:18, 53:23, 55:24, 56:6, 56:15, 57:26, 58:8, 58:29, 59:7, 59:16, 61:18, 65:12, 67:16, 68:22, 68:28, 69:21, 69:24, 70:1, 72:20, 73:29, 75:2, 75:23, 75:28, 76:2, 78:10, 78:18, 80:21, 81:7, 82:10, 82:14, 83:24, 83:26, 84:26, 85:6, 86:28, 87:26, 87:27, 88:24, 88:29, 94:18, 95:11, 96:7, 96:22, 97:12, 98:29, 99:10, 99:18,	<hr/> <b>2</b> <hr/>	
		<b>2</b> [13] - 2:17, 2:26, 2:30, 3:9, 134:5, 135:16, 135:17, 136:7, 136:11, 147:15, 147:16, 197:24, 208:8 <b>2/10</b> [2] - 72:14, 72:15 <b>2/3</b> [1] - 72:12 <b>2/4/98</b> [1] - 165:2 <b>20</b> [1] - 114:10 <b>20-something</b> [2] - 205:27, 206:3 <b>200/07</b> [1] - 133:28 <b>2001</b> [2] - 32:21 <b>2002</b> [1] - 116:21 <b>2003</b> [2] - 177:14 <b>2004</b> [1] - 177:16 <b>2005</b> [2] - 32:28, 69:14 <b>2007</b> [3] - 70:8, 99:2, 133:28 <b>2008</b> [1] - 32:28 <b>2009</b> [2] - 33:1, 178:15 <b>2010</b> [6] - 165:17, 177:20, 177:22, 202:7, 202:19 <b>2011</b> [12] - 7:26, 24:19, 24:22, 125:5, 181:18, 188:8, 202:20, 217:18,		

**2136** [1] - 180:14  
**2139** [1] - 180:22  
**214** [1] - 5:10  
**2148** [1] - 180:28  
**2153** [1] - 181:6  
**2158** [1] - 181:16  
**2169** [2] - 186:2, 186:29  
**2170** [1] - 187:14  
**2171** [2] - 188:1, 198:6  
**2173** [1] - 188:17  
**2175** [2] - 189:6, 189:21  
**2178** [1] - 190:3  
**2180** [1] - 190:19  
**2185** [1] - 196:29  
**21st** [2] - 164:27, 220:27  
**22/1/02** [1] - 165:8  
**23** [1] - 177:28  
**23-page** [1] - 73:14  
**2323** [1] - 107:15  
**2346** [1] - 108:23  
**23rd** [3] - 33:2, 217:21, 221:8  
**24** [3] - 23:11, 82:20, 157:7  
**24/6/99** [1] - 165:6  
**2451** [1] - 32:3  
**2453** [1] - 51:20  
**2495** [3] - 67:22, 68:3, 106:10  
**24th** [7] - 35:12, 48:9, 192:9, 219:8, 221:13, 221:20, 225:22  
**25** [4] - 178:14, 187:21, 205:4, 205:8  
**2550** [1] - 176:24  
**2556** [1] - 192:1  
**2557** [1] - 192:5  
**25th** [2] - 33:5, 48:3  
**26/8/2009** [1] - 187:22  
**26th** [2] - 178:14, 189:18  
**27th** [2] - 178:15, 221:23  
**28th** [5] - 54:7, 59:1, 59:10, 129:13, 221:28  
**29th** [1] - 192:10  
**2A** [2] - 134:10  
**2nd** [8] - 36:1, 36:2, 41:29, 42:9, 42:11, 179:19, 222:12, 225:7

### 3

**3** [1] - 26:5  
**30** [1] - 4:6  
**30th** [3] - 192:5, 218:2, 222:3  
**30th/31st** [1] - 221:16  
**31** [1] - 4:7  
**313** [1] - 33:29  
**314** [1] - 35:14  
**31st** [1] - 165:13  
**32** [4] - 4:9, 4:10, 161:18, 185:8  
**34** [2] - 53:3, 56:28  
**35** [1] - 1:18  
**365** [1] - 82:20  
**3:00am** [2] - 82:21, 82:22  
**3:00pm** [2] - 193:22, 206:18

### 4

**4** [4] - 90:26, 90:28, 92:9, 94:4  
**4/10** [1] - 72:21  
**40** [1] - 4:11  
**47** [1] - 184:26  
**48** [2] - 157:1, 157:8  
**4th** [5] - 36:3, 129:15, 129:16, 165:21, 222:19

### 5

**50** [1] - 3:9  
**50/13** [3] - 67:27, 68:1, 106:8  
**50/2013** [1] - 68:10  
**51** [3] - 4:12, 4:14, 4:15  
**56** [2] - 4:16, 196:2  
**5:00pm** [2] - 123:2, 167:8  
**5:30** [3] - 132:4, 136:18, 136:25  
**5:30pm** [1] - 116:26  
**5th** [6] - 117:6, 117:12, 144:27, 172:1, 172:23, 176:4

### 6

**6** [2] - 4:4, 4:5  
**6/10** [1] - 73:10  
**62** [1] - 4:17

**63** [1] - 4:18  
**65** [2] - 4:20, 4:21  
**6:30** [1] - 132:3  
**6:40pm** [2] - 126:29, 132:3  
**6th** [3] - 220:24, 222:25, 224:12

### 7

**7** [2] - 32:2, 51:20  
**7th** [18] - 17:17, 36:17, 37:11, 116:25, 118:27, 126:29, 136:19, 143:12, 143:14, 144:13, 148:14, 156:7, 169:12, 169:13, 180:9, 184:25, 223:7, 225:16

### 8

**8** [2] - 2:14, 196:22  
**81** [1] - 4:22  
**83** [17] - 12:24, 12:26, 13:21, 15:5, 15:10, 76:4, 81:19, 83:6, 90:9, 90:25, 90:29, 91:1, 91:3, 91:5, 92:1, 92:22, 106:3  
**83(2)** [3] - 13:27, 14:22, 14:28  
**83(2)** [1] - 14:22  
**85** [49] - 10:6, 10:8, 12:7, 12:10, 12:11, 12:29, 13:6, 13:14, 13:17, 13:21, 13:24, 14:20, 14:29, 15:17, 16:4, 38:8, 53:23, 56:1, 56:2, 56:10, 57:26, 58:5, 58:6, 59:17, 68:13, 68:24, 76:4, 76:5, 79:25, 81:24, 83:7, 89:25, 90:18, 91:10, 92:13, 94:11, 101:8, 101:13, 105:12, 106:3, 106:11, 111:7, 111:8, 112:5, 112:11, 112:19, 195:27, 196:2  
**85s** [1] - 58:3  
**87** [2] - 91:13, 110:28  
**89** [1] - 100:17  
**8:50** [1] - 143:12  
**8th** [26] - 7:18, 9:6, 18:2, 22:4, 27:21, 27:23, 27:28, 29:14,

29:25, 30:2, 30:10, 30:29, 36:11, 42:18, 47:7, 65:10, 71:11, 71:17, 96:9, 107:17, 146:28, 157:28, 158:13, 174:4, 191:25, 223:13

### 9

**91** [9] - 74:24, 76:25, 83:29, 84:2, 84:21, 84:24, 87:26, 103:22  
**93** [4] - 103:13, 103:21, 110:24, 111:3  
**931** [2] - 17:15  
**95** [2] - 84:17, 103:10  
**98** [4] - 52:3, 74:26, 84:17, 103:8  
**999** [4] - 72:21, 73:5, 137:2, 161:16  
**9:05** [1] - 154:13  
**9:15** [1] - 130:24  
**9:20am** [1] - 123:12  
**9th** [11] - 27:28, 47:11, 77:5, 77:9, 89:15, 95:20, 96:9, 109:2, 218:21, 223:21, 226:11

### A

**abeyance** [4] - 189:25, 189:29, 190:21, 195:8  
**able** [3] - 104:27, 150:9, 150:26  
**above-named** [1] - 1:27  
**absence** [1] - 93:4  
**absences** [1] - 46:27  
**absent** [1] - 195:18  
**absolute** [1] - 101:12  
**absolutely** [9] - 30:28, 31:4, 71:10, 78:17, 79:17, 91:4, 99:25, 113:2, 191:20  
**abundance** [1] - 15:3  
**abuse** [1] - 188:3  
**abused** [2] - 178:10, 187:19  
**abusive** [1] - 19:19  
**accept** [25] - 20:2, 20:7, 21:8, 21:14, 45:8, 46:3, 46:17, 47:1, 47:3, 69:29, 70:4, 70:6, 70:12, 90:21, 93:15, 94:29, 102:13, 104:7, 104:9,

111:16, 115:12, 144:29, 173:27, 175:7  
**accepted** [8] - 76:17, 76:19, 76:23, 115:12, 211:16, 211:17, 215:7, 219:11  
**access** [6] - 131:3, 134:27, 153:24, 154:25, 162:27, 163:3  
**accessed** [2] - 178:13, 187:20  
**accessing** [2] - 181:8, 181:11  
**accident** [1] - 160:13  
**accidentally** [2] - 65:27, 202:13  
**accidents** [1] - 82:24  
**accommodation** [1] - 132:29  
**accordance** [6] - 13:14, 16:4, 66:2, 69:10, 69:12, 194:3  
**account** [6] - 55:22, 78:9, 195:5, 212:5, 212:7, 215:5  
**achieve** [1] - 200:1  
**acknowledge** [5] - 187:7, 197:23, 197:25, 197:27, 198:4  
**acknowledged** [1] - 82:1  
**acknowledgement** [1] - 14:5  
**acknowledges** [1] - 135:18  
**act** [5] - 52:3, 69:12, 86:12, 165:14, 192:13  
**Act** [29] - 11:27, 13:17, 22:19, 66:18, 68:15, 68:16, 69:14, 70:24, 80:21, 80:24, 87:2, 87:29, 89:25, 90:21, 90:27, 90:28, 91:1, 94:5, 95:5, 96:22, 97:21, 99:15, 100:5, 100:12, 106:13, 110:9, 110:29, 112:1, 180:4  
**ACT** [2] - 1:4, 1:9  
**acted** [1] - 173:20  
**acting** [11] - 69:10, 74:7, 74:18, 74:19, 76:8, 96:29, 97:1, 97:28, 98:1, 105:23, 165:12  
**Acting** [1] - 108:29  
**action** [13] - 1:28, 8:10, 70:13, 89:12, 101:14, 109:8, 110:1, 110:2, 167:23,

174:12, 190:7, 204:19  
**Action** [1] - 89:13  
**actions** [7] - 6:16, 6:17, 57:7, 61:28, 65:26, 87:17, 95:15  
**actual** [12] - 7:27, 8:9, 8:16, 8:17, 13:11, 15:13, 25:13, 27:24, 40:4, 87:7, 179:2, 219:4  
**add** [2] - 10:26, 227:7  
**added** [2] - 157:20, 157:21  
**addiction** [1] - 125:15  
**addition** [1] - 86:13  
**additional** [3] - 27:6, 215:23  
**address** [5] - 24:13, 85:27, 187:10, 219:2, 219:6  
**addressed** [1] - 198:24  
**addresses** [2] - 109:13, 131:5  
**adhere** [1] - 99:4  
**ADJOURNED** [2] - 115:22, 227:14  
**admissibility** [7] - 68:24, 83:11, 83:18, 83:25, 91:13, 103:27, 111:28  
**admissible** [4] - 68:20, 68:27, 101:16, 111:4  
**admit** [1] - 216:4  
**admitted** [1] - 111:4  
**advancement** [1] - 158:14  
**advantage** [1] - 199:28  
**advice** [7] - 125:1, 134:6, 135:19, 160:28, 161:3, 161:8, 161:10  
**advised** [5] - 18:19, 120:14, 121:13, 154:29, 189:3  
**Affairs** [8] - 15:12, 27:10, 49:26, 106:24, 189:27, 191:27, 192:18, 207:6  
**affect** [3] - 20:18, 213:3  
**affidavit** [12] - 52:23, 52:25, 184:25, 190:29, 196:20, 196:24, 196:25, 196:27, 197:1, 197:4, 211:16, 212:18  
**AFFIRMED** [1] - 65:3  
**afford** [1] - 155:7  
**afraid** [3] - 41:17, 49:16, 112:21  
**AFTER** [1] - 116:1  
**afternoon** [2] - 101:3, 157:15  
**afterwards** [8] - 16:13, 16:19, 16:28, 17:5, 142:5, 151:25, 158:2, 205:7  
**again** [1] - 19:27  
**agitated** [8] - 119:14, 140:23, 141:2, 151:3, 152:6, 156:29, 157:6, 222:6  
**agitation** [1] - 153:2  
**ago** [5] - 70:24, 120:5, 127:13, 161:6, 164:4  
**agree** [16] - 16:7, 49:4, 57:10, 57:19, 59:13, 67:8, 67:9, 86:6, 86:12, 90:10, 93:8, 121:16, 121:26, 139:18, 147:4, 150:22  
**agreed** [9] - 16:2, 16:4, 73:9, 73:10, 73:16, 74:21, 74:23, 109:8, 121:25  
**AGS** [3] - 72:16, 73:26, 73:27  
**ahead** [2] - 80:1, 80:2  
**alarm** [2] - 133:2, 134:27  
**alarms** [1] - 135:25  
**albeit** [1] - 185:24  
**alert** [1] - 133:7  
**alerted** [3] - 35:24, 37:1, 117:13  
**alia** [1] - 80:28  
**allegation** [9] - 39:5, 129:3, 130:5, 149:4, 188:2, 219:11, 224:20, 225:8, 226:8  
**allegations** [20] - 10:1, 12:3, 16:1, 16:10, 19:20, 42:22, 42:25, 42:27, 68:11, 90:12, 106:5, 107:4, 120:9, 129:26, 164:6, 185:19, 188:20, 208:22, 227:2  
**Alleged** [1] - 118:24  
**alleged** [22] - 34:18, 36:24, 36:27, 39:10, 67:6, 73:12, 92:2, 104:13, 110:19, 122:12, 123:4, 126:11, 137:28, 155:14, 181:17, 186:21, 219:22, 219:28, 220:10, 222:1, 226:3, 226:4  
**allegedly** [8] - 16:15, 129:23, 149:29, 171:24, 174:23, 178:9, 187:18, 218:27  
**alleges** [1] - 122:16  
**allocation** [1] - 116:12  
**allow** [1] - 79:18  
**allows** [3] - 14:23, 87:9, 93:2  
**almost** [4] - 31:16, 50:10, 65:22, 82:14  
**alone** [5] - 66:17, 66:26, 96:28, 119:13, 153:2  
**alongside** [1] - 207:18  
**alternative** [1] - 98:14  
**altogether** [1] - 129:9  
**amazing** [1] - 161:26  
**ammunition** [1] - 161:22  
**amount** [2] - 81:10, 199:22  
**ample** [1] - 161:22  
**ancillary** [1] - 142:15  
**AND** [3] - 1:4, 1:5, 1:9  
**Andrew** [2] - 131:2, 181:18  
**angles** [1] - 151:4  
**angry** [2] - 219:12, 219:15  
**annoy** [1] - 218:12  
**annual** [4] - 57:27, 57:29, 196:4, 197:2  
**anonymous** [7] - 180:29, 181:1, 205:22, 205:26, 205:29, 218:21, 218:25  
**anonymous-letter** [1] - 180:29  
**answer** [16] - 11:4, 11:5, 11:14, 17:2, 23:2, 23:6, 40:22, 60:15, 81:13, 114:17, 133:15, 142:4, 164:11, 170:5, 192:28, 212:14  
**answering** [1] - 82:22  
**answers** [1] - 81:9  
**ANTHONY** [2] - 2:15, 2:20  
**anticipated** [1] - 152:3  
**anticipating** [2] - 28:27, 150:15  
**anticipation** [1] - 17:27  
**anxious** [2] - 48:18, 198:20  
**anyway** [4] - 99:16, 142:24, 184:6, 185:26  
**apologies** [1] - 75:10  
**apologise** [3] - 26:15, 96:21, 102:17  
**apparent** [3] - 35:15, 85:4, 119:10  
**appear** [28] - 19:28, 48:6, 56:25, 63:17, 74:28, 79:4, 84:29, 85:25, 101:1, 103:11, 112:18, 118:18, 124:7, 131:9, 140:25, 151:9, 156:3, 156:4, 157:27, 172:6, 179:17, 180:1, 180:8, 180:11, 181:15, 190:4, 209:25, 211:25  
**appearance** [1] - 79:14  
**APPEARANCES** [1] - 2:1  
**appeared** [7] - 47:15, 101:24, 119:13, 146:9, 150:4, 202:17, 202:19  
**Appendix** [4] - 178:29, 179:9, 196:22, 197:24  
**application** [2] - 49:8, 212:12  
**applications** [1] - 167:29  
**applied** [4] - 13:22, 165:7, 165:16, 218:7  
**applies** [2] - 11:22, 217:20  
**appoint** [2] - 17:25, 179:24  
**appointed** [33] - 29:5, 29:12, 29:13, 32:13, 32:19, 32:26, 32:29, 34:27, 64:13, 64:20, 97:29, 116:22, 165:8, 165:18, 177:27, 178:17, 178:21, 179:3, 185:12, 186:5, 186:10, 186:20, 186:24, 188:19, 188:24, 191:5, 193:26, 194:9, 194:28, 199:29, 212:2, 213:11, 213:13  
**appointing** [1] - 211:29  
**appointment** [33] - 17:28, 29:3, 29:4, 29:8, 29:11, 117:21, 118:26, 178:9, 178:19, 178:22, 178:23, 179:2, 180:2, 181:25, 187:15, 189:5, 191:3, 191:16, 192:21, 192:25, 194:2, 194:7, 194:13, 197:29, 200:7, 200:11, 202:24, 204:10, 208:5, 211:23, 212:24, 214:21  
**appointments** [1] - 193:29  
**appoints** [1] - 221:23  
**appreciate** [17] - 14:27, 15:2, 16:26, 20:3, 45:15, 112:24, 140:19, 141:1, 159:16, 184:12, 198:28, 199:3, 201:14, 204:12, 211:27, 216:24  
**approach** [2] - 184:11, 213:15  
**approached** [1] - 184:15  
**approaching** [1] - 185:28  
**appropriate** [10] - 12:6, 59:17, 60:12, 79:23, 147:14, 181:28, 182:5, 185:29, 213:15, 214:22  
**approval** [3] - 23:13, 27:4, 27:6  
**April** [12] - 72:21, 177:2, 178:15, 180:17, 183:22, 184:1, 192:9, 192:10, 212:17, 219:8, 219:27  
**Archbold** [1] - 49:1  
**area** [7] - 37:4, 48:21, 133:10, 142:8, 161:12, 166:19, 169:22  
**areas** [3] - 23:17, 174:25, 193:13  
**argument** [2] - 45:7,

185:14  
**arguments** [2] - 38:19, 44:7  
**arise** [7] - 70:2, 102:15, 203:28, 217:26, 218:3, 218:10, 223:15  
**arisen** [6] - 88:4, 97:18, 97:25, 100:10, 102:14, 211:26  
**arises** [4] - 63:18, 90:27, 223:5, 224:7  
**arising** [13] - 31:7, 38:28, 51:3, 67:6, 68:11, 68:25, 69:5, 152:27, 155:14, 158:21, 175:26, 214:7, 215:21  
**armed** [1] - 167:5  
**arms** [1] - 221:9  
**arose** [1] - 149:8  
**arrange** [3] - 134:14, 198:22, 225:22  
**arranged** [1] - 204:1  
**arrangements** [2] - 117:18, 132:27  
**Arrangements** [1] - 125:10  
**arrest** [1] - 150:29  
**arrested** [5] - 129:3, 129:10, 150:19, 153:15, 158:10  
**arrested"** [1] - 129:18  
**arrested'** [1] - 129:25  
**arrival** [2] - 122:4, 149:13  
**arrive** [1] - 15:19  
**arrived** [7] - 36:16, 47:20, 50:7, 154:3, 166:10, 178:23, 201:8  
**arrow** [1] - 73:11  
**ARTHUR** [1] - 2:16  
**articulate** [1] - 153:19  
**AS** [4] - 6:1, 116:1, 211:9, 214:12  
**asap** [1] - 73:18  
**ascertaining** [1] - 119:7  
**aside** [6] - 50:2, 93:15, 93:16, 99:15, 112:28, 208:28  
**aspect** [3] - 85:4, 103:21, 123:21  
**aspects** [5] - 17:26, 37:28, 154:5, 183:17, 183:18  
**assault** [4] - 86:25, 188:3, 188:20, 208:8

**assaulted** [2] - 178:10, 187:19  
**assaults** [2] - 73:14, 214:20  
**asserting** [2] - 124:23, 124:25  
**assertion** [1] - 52:29  
**assess** [3] - 84:2, 138:11, 210:21  
**assessed** [1] - 210:17  
**assessing** [5] - 138:7, 138:8, 138:9, 146:17, 147:5  
**assessment** [8] - 84:24, 117:18, 117:23, 134:20, 136:7, 138:5, 146:19, 146:21  
**assets** [2] - 41:11, 42:21  
**assigned** [1] - 52:6  
**assist** [4] - 44:29, 46:6, 54:20, 158:14  
**assistance** [2] - 217:4, 217:6  
**assistant** [4] - 17:24, 28:25, 74:16, 177:19  
**assisting** [2] - 125:19, 167:25  
**associated** [2] - 171:20, 181:15  
**associates** [1] - 171:15  
**assume** [1] - 206:12  
**assumed** [2] - 29:29, 97:14  
**assuming** [2] - 90:8, 184:13  
**assumption** [2] - 60:13, 159:25  
**asterisk** [1] - 75:14  
**asterisks** [5] - 75:13, 75:18, 88:3, 89:10, 100:1  
**AT** [1] - 227:15  
**Athlone** [5] - 57:7, 61:28, 208:10, 208:11, 208:12  
**attach** [1] - 35:19  
**attached** [14] - 23:27, 24:22, 93:6, 107:26, 108:10, 116:29, 117:3, 126:3, 176:3, 176:13, 186:22, 186:25, 197:24, 210:12  
**attaches** [1] - 180:27  
**attack** [1] - 163:1  
**attained** [1] - 170:26

**attempt** [1] - 185:4  
**attempted** [2] - 184:29, 197:5  
**attempts** [1] - 113:9  
**attend** [5] - 6:27, 37:14, 42:23, 82:24  
**attended** [5] - 36:11, 108:2, 168:6, 168:27, 175:4  
**attending** [4] - 42:19, 43:1, 121:20, 168:26  
**attends** [1] - 7:3  
**attention** [6] - 34:10, 94:20, 105:10, 105:15, 105:16, 105:20  
**attitude** [1] - 12:19  
**attributed** [2] - 53:17, 224:26  
**audits** [1] - 46:26  
**August** [12] - 33:16, 33:28, 41:21, 116:11, 116:17, 164:26, 165:13, 178:15, 220:27, 221:8, 221:13, 221:16  
**auspices** [1] - 188:26  
**authorised** [1] - 91:17  
**authorises** [1] - 65:16  
**authority** [4] - 93:27, 96:24, 96:25, 97:22  
**available** [10] - 7:10, 74:25, 82:18, 85:6, 85:14, 89:23, 93:1, 102:24, 168:14, 169:3  
**availed** [1] - 183:29  
**avenue** [5] - 12:6, 16:3, 16:5, 85:14, 109:28  
**avenues** [2] - 92:29, 108:19  
**avoid** [1] - 185:20  
**aware** [66] - 7:24, 7:28, 11:20, 11:22, 11:26, 18:1, 18:5, 18:7, 25:14, 26:25, 27:23, 27:24, 27:25, 27:28, 28:5, 28:6, 30:15, 36:27, 38:28, 41:20, 45:29, 53:27, 54:1, 54:2, 54:4, 56:8, 64:15, 64:17, 64:20, 67:29, 80:15, 80:18, 95:4, 97:10, 109:4, 118:4, 127:27, 133:8, 135:7, 135:13, 137:14, 137:16,

138:18, 140:27, 143:10, 146:26, 148:16, 148:19, 151:18, 152:8, 152:27, 161:14, 175:3, 184:7, 186:12, 190:27, 197:8, 202:29, 207:22, 207:24, 207:27, 208:1, 208:24, 213:29, 214:2, 214:3  
**awful** [1] - 38:17

## B

**background** [13] - 53:28, 59:9, 125:2, 125:12, 131:1, 131:8, 131:23, 132:12, 134:17, 136:28, 136:29, 182:16, 204:8  
**bad** [3] - 41:4, 102:26, 156:25  
**badly** [2] - 130:1, 130:6  
**Ballyconnell** [1] - 31:13  
**Ballymote** [1] - 177:21  
**Ballyshannon** [13] - 33:4, 33:5, 33:9, 33:24, 40:18, 41:2, 41:4, 41:5, 42:20, 45:21, 49:15, 49:18, 50:7  
**bar** [1] - 209:12  
**barnes** [1] - 216:14  
**Barnes** [2] - 148:5, 158:20  
**BARNES** [18] - 3:3, 4:32, 30:20, 50:23, 100:26, 148:7, 158:25, 158:29, 159:3, 159:8, 163:16, 163:21, 163:22, 164:12, 175:25, 211:2, 216:15, 216:18  
**barred** [1] - 208:16  
**base** [1] - 95:9  
**based** [7] - 77:9, 86:16, 122:13, 125:15, 135:2, 135:3, 149:10  
**basic** [1] - 113:28  
**basis** [12] - 45:13, 57:28, 57:29, 58:24, 58:28, 59:19, 59:27, 69:3, 69:24, 71:6, 78:10, 202:28

**beacon** [1] - 31:19  
**bearing** [2] - 134:21, 135:25  
**beating** [1] - 161:7  
**became** [11] - 31:21, 37:8, 64:17, 64:20, 80:15, 80:18, 139:11, 153:17, 177:7, 184:7, 226:15  
**become** [4] - 38:25, 55:9, 83:14, 83:16  
**becoming** [1] - 70:24  
**BEEN** [5] - 32:5, 51:22, 116:6, 164:21, 176:26  
**beg** [2] - 148:7, 209:17  
**begged** [1] - 222:6  
**beginning** [5] - 75:15, 106:13, 111:19, 188:5, 188:6  
**behalf** [4] - 21:23, 56:25, 63:17, 101:1  
**behaviour** [6] - 34:5, 35:17, 67:7, 68:11, 109:18, 202:6  
**behind** [3] - 69:1, 78:12, 104:24  
**belief** [1] - 184:15  
**believes** [4] - 11:23, 87:13, 87:14, 130:13  
**belongings** [4] - 35:28, 41:25, 41:26, 221:5  
**below** [3] - 129:11, 130:1, 130:23  
**beside** [2] - 88:3, 152:20  
**best** [9] - 16:3, 16:5, 48:17, 73:20, 112:14, 122:1, 122:8, 159:8, 204:28  
**better** [5] - 128:19, 152:7, 155:3, 162:26, 209:7  
**between** [27] - 12:10, 38:14, 56:8, 57:29, 59:2, 66:25, 87:6, 87:10, 92:21, 98:22, 101:15, 102:2, 114:6, 129:28, 142:18, 149:15, 156:10, 178:14, 185:14, 186:15, 187:22, 195:28, 202:3, 202:6, 202:27, 206:26, 217:24  
**big** [1] - 142:8  
**birth** [2] - 24:13, 24:24

**bit** [7] - 24:3, 74:4, 122:7, 143:18, 212:28, 214:19, 217:14  
**bits** [2] - 25:27, 157:20  
**BL** [11] - 2:7, 2:10, 2:11, 2:11, 2:16, 2:19, 2:20, 2:23, 3:3, 3:8, 3:11  
**blacklion** [1] - 206:18  
**Blacklion** [4] - 177:9, 177:11, 178:28, 182:10  
**Blacklion**" [1] - 193:22  
**blamed** [1] - 220:14  
**block** [1] - 143:23  
**blown** [1] - 210:14  
**blue** [2] - 66:24, 102:1  
**board** [1] - 184:14  
**bodily** [1] - 86:11  
**body** [1] - 86:10  
**Bogle** [4] - 180:16, 219:27, 220:2, 221:25  
**boiling** [1] - 161:23  
**bold** [1] - 87:4  
**bona** [2] - 201:6, 218:10  
**bones** [1] - 23:14  
**book** [2] - 75:17, 89:10  
**books** [1] - 186:9  
**border** [4] - 116:19, 164:29, 165:4, 177:5  
**bother** [1] - 145:14  
**bottom** [6] - 39:12, 48:22, 109:11, 109:13, 135:17, 187:8  
**brackets** [1] - 120:8  
**branch** [3] - 32:14, 32:16, 167:5  
**BRAONÁIN** [2] - 3:8, 216:29  
**Braonáin** [1] - 216:28  
**breach** [1] - 201:10  
**breaches** [2] - 185:1, 186:21  
**break** [2] - 58:2, 115:19  
**Brian** [1] - 74:8  
**BRIAN** [1] - 2:23  
**brief** [12] - 148:3, 168:12, 168:18, 168:29, 169:4, 175:9, 182:16, 211:5, 211:6, 216:19, 216:25, 227:8

**briefed** [3] - 38:1, 166:19, 174:10  
**briefing** [2] - 174:8, 174:15  
**briefings** [1] - 37:7  
**briefly** [5] - 24:17, 81:10, 81:11, 212:21, 217:15  
**Brigid** [1] - 26:10  
**bring** [7] - 42:26, 58:14, 91:22, 91:26, 94:19, 118:23, 169:4  
**bringing** [1] - 104:15  
**broadly** [1] - 156:28  
**broken** [1] - 125:4  
**brother** [1] - 153:22  
**brought** [9] - 17:15, 34:1, 105:9, 105:15, 105:16, 105:20, 122:26, 133:21, 152:12  
**Browne** [1] - 60:20  
**building** [2] - 218:28, 219:16  
**built** [1] - 163:8  
**bulk** [1] - 75:26  
**bullied** [1] - 218:15  
**bullying** [1] - 220:10  
**Buncrana** [8] - 7:29, 31:15, 32:13, 125:18, 217:21, 217:23, 217:29  
**Bundoran/ Ballyshannon** [1] - 37:4  
**burden** [2] - 87:21, 185:22  
**burn** [5] - 72:11, 72:12, 129:11, 131:12, 222:1  
**Burnfoot** [2] - 165:3, 165:4  
**burning** [4] - 130:6, 214:25, 215:7, 219:23  
**burnt** [5] - 122:15, 130:2, 130:6, 130:15, 130:20  
**business** [6] - 13:10, 110:16, 110:19, 110:22, 145:6, 223:13  
**BY** [63] - 1:5, 1:8, 2:12, 2:16, 2:20, 2:24, 2:29, 3:4, 3:8, 4:5, 4:6, 4:7, 4:10, 4:11, 4:12, 4:15, 4:16, 4:17, 4:18, 4:21, 4:22, 4:23, 4:24, 4:25, 4:28, 4:29, 4:30, 4:31, 4:32, 5:2, 5:3, 5:4, 5:8, 5:9, 5:10, 6:7, 30:22, 31:9,

32:6, 40:25, 51:1, 51:23, 56:22, 62:11, 63:15, 65:4, 81:16, 100:29, 107:9, 110:6, 116:7, 133:18, 148:9, 159:14, 163:21, 164:22, 170:8, 175:29, 176:27, 193:2, 211:8, 214:11  
**Byrne** [1] - 52:16

## C

**C/SUPT** [1] - 3:7  
**calculate** [1] - 197:15  
**call-back** [1] - 114:2  
**caller** [4] - 166:27, 168:2, 171:11, 172:29  
**calm** [1] - 21:4  
**Cambodia** [1] - 177:11  
**cameras** [2] - 162:27, 163:3  
**CAMPBELL** [4] - 4:4, 6:7, 30:22, 31:9  
**Campbell** [6] - 6:4, 6:5, 6:8, 30:18, 30:23, 31:10  
**Campbell's** [1] - 43:19  
**cannot** [6] - 38:10, 44:16, 47:21, 60:8, 100:3, 206:17  
**canvassed** [1] - 121:18  
**capable** [5] - 114:16, 126:5, 153:23, 160:18, 162:29  
**capacity** [3] - 52:5, 116:25, 125:17  
**capturing** [1] - 129:27  
**car** [4] - 181:11, 219:5, 220:13, 221:10  
**care** [3] - 84:9, 166:2, 166:5  
**career** [6] - 31:11, 32:8, 116:9, 155:17, 164:24, 176:29  
**careful** [1] - 158:26  
**carefully** [1] - 71:2  
**carried** [10] - 54:9, 54:16, 60:1, 60:5, 60:27, 64:11, 99:20, 138:11, 147:15, 211:18  
**Carrigans** [1] - 116:19

**carry** [16] - 8:10, 60:19, 64:13, 73:4, 103:1, 117:17, 134:19, 167:3, 183:16, 188:19, 192:19, 194:28, 207:28, 211:12, 211:13, 212:6  
**carrying** [2] - 21:27, 91:23  
**CARTHAGE** [1] - 2:24  
**case** [35] - 7:20, 15:16, 28:29, 29:27, 58:6, 69:21, 70:16, 70:25, 77:18, 78:26, 78:27, 79:7, 80:26, 80:27, 85:12, 89:7, 98:13, 103:18, 104:21, 109:1, 110:16, 111:15, 112:14, 142:11, 142:16, 161:5, 161:6, 182:24, 183:20, 194:5, 203:6, 211:11, 225:25, 225:26  
**case-management** [2] - 78:26, 80:26  
**cases** [5] - 12:16, 82:15, 95:1, 95:2, 191:13  
**casework** [3] - 58:6, 78:21, 78:23  
**caseworkers** [1] - 101:9  
**CASTLE** [1] - 1:17  
**Castlefinn** [1] - 164:28  
**category** [3] - 46:18, 46:23, 138:14  
**CATHAL** [1] - 3:8  
**causal** [2] - 87:10, 87:17  
**caused** [10] - 11:24, 65:25, 67:14, 84:3, 86:20, 86:21, 87:14, 87:19, 87:22, 95:15  
**causes** [3] - 86:8, 86:9, 111:14  
**causing** [3] - 48:14, 86:25, 87:7  
**caution** [1] - 15:3  
**Cavan** [3] - 28:28, 31:13, 177:9  
**Cavan-Monaghan** [1] - 28:28  
**CCTV** [4] - 39:7, 83:4, 133:2, 134:27  
**ceased** [1] - 190:28  
**ceasing** [1] - 192:15

**cell** [2] - 126:6, 126:8  
**central** [1] - 149:4  
**centre** [2] - 113:24, 131:10  
**centred** [1] - 38:8  
**certain** [13] - 17:3, 20:14, 21:20, 22:28, 23:4, 68:15, 68:25, 82:3, 87:16, 133:5, 223:10, 225:17, 225:18  
**CERTAIN** [1] - 1:4  
**certainly** [29] - 11:16, 22:13, 22:15, 45:17, 48:29, 70:22, 75:17, 82:20, 85:2, 85:3, 85:24, 87:27, 92:29, 95:8, 99:11, 99:23, 114:25, 141:23, 145:23, 159:18, 159:26, 183:16, 196:15, 196:17, 200:27, 201:1, 203:13, 216:7, 216:10  
**certificate** [2] - 219:21, 219:22  
**certify** [1] - 1:25  
**Chair** [17] - 65:9, 66:16, 68:5, 80:12, 80:21, 87:20, 92:28, 94:2, 95:19, 96:20, 99:22, 110:3, 110:28, 112:21, 113:14, 114:21, 115:2  
**CHAIRMAN** [114] - 4:7, 4:17, 4:25, 4:31, 5:10, 31:9, 31:10, 31:17, 31:19, 31:21, 31:24, 60:18, 61:7, 61:10, 62:11, 62:12, 62:20, 62:24, 62:29, 63:9, 68:4, 93:7, 93:22, 94:1, 100:25, 110:6, 110:7, 110:14, 110:20, 110:23, 111:5, 111:20, 112:3, 112:13, 112:24, 113:3, 113:8, 113:15, 114:6, 114:9, 114:16, 114:23, 114:26, 114:29, 115:3, 115:6, 115:14, 115:19, 123:27, 144:9, 144:14, 144:16, 144:21, 148:5, 158:20, 158:28, 159:1, 159:5, 159:7, 159:9, 159:14, 159:15, 159:23, 160:3, 160:11,



160:14, 160:21, 160:24, 161:3, 162:14, 162:17, 162:23, 163:2, 163:4, 163:9, 163:14, 163:18, 164:13, 170:16, 170:22, 170:28, 176:17, 186:27, 189:15, 196:24, 196:27, 199:3, 199:13, 199:17, 200:4, 200:9, 200:28, 201:12, 201:14, 201:20, 203:9, 203:18, 203:23, 204:23, 210:2, 214:12, 214:13, 215:2, 215:4, 215:15, 215:28, 216:1, 216:12, 216:17, 216:19, 216:22, 216:27, 217:1, 217:10

**Chairman** [32] - 31:7, 50:24, 51:18, 63:19, 71:14, 100:27, 116:10, 116:28, 118:29, 121:11, 121:24, 122:2, 123:18, 126:16, 127:12, 140:1, 144:19, 150:13, 152:2, 159:11, 160:2, 161:2, 163:16, 175:25, 175:27, 199:11, 211:6, 215:16, 215:20, 215:25, 216:24, 217:3

**CHAMBERS** [1] - 2:25

**chance** [4] - 59:21, 95:25, 96:17, 216:24

**channels** [1] - 181:29

**characterise** [1] - 108:6

**charade** [1] - 225:3

**charge** [9] - 14:12, 32:18, 33:12, 39:18, 39:22, 116:20, 167:5, 168:4, 220:9

**CHARLETON** [2] - 1:12, 2:2

**CHARLTON** [1] - 2:29

**chat** [1] - 151:11

**check** [3] - 51:4, 51:6, 92:23

**checking** [1] - 137:13

**checklist** [1] - 117:27

**checks** [1] - 181:13

**chest** [1] - 154:21

**CHIEF** [1] - 2:12

**chief** [58] - 6:28, 7:4, 9:8, 10:18, 10:24, 12:12, 14:18, 21:23, 23:13, 26:1, 26:2, 26:18, 26:24, 27:1, 28:14, 29:1, 29:2, 33:25, 34:3, 34:10, 34:14, 34:16, 35:11, 35:16, 36:8, 37:18, 37:27, 40:5, 40:6, 45:29, 48:9, 48:19, 49:25, 95:23, 96:28, 97:11, 121:20, 124:1, 127:15, 128:27, 135:6, 142:5, 143:4, 150:4, 153:15, 155:15, 155:19, 168:17, 174:7, 176:8, 184:19, 189:27, 190:12, 191:26, 192:17, 207:3, 207:5, 211:28

**Chief** [83] - 7:24, 8:19, 9:4, 9:19, 16:7, 20:13, 21:3, 27:9, 27:12, 27:21, 28:3, 34:27, 38:14, 53:12, 56:18, 57:4, 61:25, 62:14, 62:18, 62:20, 62:22, 62:26, 63:6, 63:22, 64:4, 98:10, 98:11, 106:17, 106:24, 107:16, 117:29, 120:13, 121:13, 132:21, 137:8, 137:24, 142:29, 144:7, 145:2, 145:11, 145:12, 146:14, 164:2, 177:26, 178:17, 178:21, 178:27, 179:6, 179:22, 181:6, 181:24, 182:7, 182:9, 183:3, 185:12, 188:19, 189:3, 189:17, 189:20, 189:22, 190:2, 190:5, 191:5, 191:22, 191:25, 192:4, 192:8, 193:7, 194:9, 194:15, 204:1, 205:2, 205:10, 205:28, 206:6, 206:25, 206:28, 207:25, 218:9, 219:8, 221:23, 222:26, 223:24

**chief's** [1] - 23:19

**child** [2] - 131:11, 131:12

**children** [9] - 20:6, 21:6, 85:29, 86:1, 131:2, 147:28, 161:27, 205:13, 226:2

**choose** [2] - 70:12, 102:13

**chose** [2] - 110:1, 110:2

**chosen** [1] - 96:25

**Chuir** [2] - 166:8, 166:14

**Church** [1] - 162:18

**Churchill** [6] - 117:6, 117:19, 118:8, 118:27, 217:23, 223:8

**circulate** [1] - 215:24

**circulated** [1] - 40:15

**circumstances** [31] - 16:11, 54:10, 58:21, 61:1, 61:18, 65:24, 65:29, 66:1, 66:4, 66:6, 66:15, 68:16, 70:3, 70:27, 81:24, 94:17, 95:17, 105:2, 110:23, 111:2, 111:14, 141:1, 143:9, 144:24, 151:29, 154:28, 155:8, 192:19, 211:24, 220:2, 226:3

**circumvent** [3] - 104:22, 105:1, 105:4

**civil** [1] - 6:17

**claimed** [1] - 226:4

**claims** [1] - 218:15

**Clanree** [1] - 125:25

**clarified** [2] - 47:12, 214:24

**clarifies** [1] - 113:8

**clarify** [4] - 62:14, 76:13, 93:7, 113:9

**clarifying** [1] - 75:28

**clarity** [3] - 96:19, 97:25, 101:13

**Clarke** [1] - 81:5

**class** [1] - 19:3

**classified** [2] - 170:18, 170:20

**clatter** [1] - 12:27

**clear** [37] - 56:3, 66:24, 69:13, 73:21, 81:18, 84:28, 85:12, 86:12, 87:3, 87:6, 88:5, 89:7, 89:23, 92:14, 94:5, 94:23, 99:26, 102:1, 102:10, 104:7, 105:1, 107:3, 110:10, 115:10, 124:15, 136:3, 140:22, 155:2, 173:23, 190:9, 194:18, 198:21, 203:24, 214:17, 214:19, 217:7

**clearly** [9] - 21:12, 46:27, 87:9, 148:19, 185:4, 185:15, 194:24, 208:2, 211:10

**clerk** [5] - 7:5, 7:6, 32:19, 165:9, 165:10

**client** [1] - 199:26

**client's** [1] - 61:7

**close** [2] - 101:15, 125:22

**closed** [4] - 11:12, 81:7, 207:23, 207:29

**closing** [3] - 17:23, 152:7, 155:29

**closure** [4] - 80:21, 80:26, 80:27, 81:1

**CMS** [3] - 78:27, 79:12, 108:10

**coastal** [1] - 116:15

**coffee** [4] - 132:10, 133:11, 141:8, 154:10

**coincides** [2] - 9:4, 43:19

**college** [1] - 139:10

**Collins** [2] - 52:15, 222:13

**collision** [1] - 50:8

**colourful** [1] - 224:24

**coming** [7] - 47:19, 69:21, 95:2, 151:4, 157:13, 164:3, 204:24

**Command** [3] - 71:25, 113:23, 113:24

**commas** [2] - 129:5, 131:13

**commence** [4] - 82:13, 82:16, 83:3, 185:1

**commencement** [2] - 70:8, 202:15

**commences** [1] - 91:1

**commencing** [4] - 46:13, 123:12, 183:19, 192:16

**comment** [14] - 60:8, 61:2, 63:9, 82:19, 104:27, 104:29, 105:5, 122:7, 122:13, 132:21, 141:5, 149:10, 160:9, 225:14

**commented** [1] - 124:2

**comments** [2] - 37:28, 122:24

**commission** [6] - 14:6, 51:26, 52:16, 65:7, 69:7, 92:4

**Commission** [6] - 84:10, 84:18, 92:6, 93:1, 93:3, 106:23

**Commissioner** [13] - 11:23, 13:26, 14:13, 49:8, 65:16, 65:17, 87:13, 92:5, 94:14, 94:17, 94:19, 96:23, 97:23

**commissioner** [3] - 17:24, 28:25, 177:19

**COMMISSIONER** [1] - 2:9

**commissioner's** [1] - 217:2

**committed** [2] - 169:20, 174:24

**committee** [1] - 162:20

**common** [4] - 44:19, 98:28, 207:14, 207:15

**commonly** [1] - 103:9

**commonness** [1] - 98:28

**commonplace** [1] - 144:1

**comms** [2] - 48:26, 49:1

**communicate** [1] - 203:20

**communicated** [1] - 149:3

**communication** [3] - 96:3, 101:15, 200:13

**communications** [3] - 166:11, 166:12, 166:23

**Communications** [1] - 172:7

**community** [3] - 116:23, 125:15, 125:29

**community-based** [1] - 125:15

**COMPANY** [2] - 2:20, 3:8

**compared** [1] - 58:3

**compiled** [1] - 118:14

**complain** [2] - 93:18, 94:25

**complainant** [4] -

14:4, 79:27, 104:14, 112:6  
**complained** [1] - 110:18  
**complaining** [4] - 13:7, 13:11, 112:27  
**complaint** [113] - 13:1, 13:3, 13:13, 13:15, 13:18, 13:20, 13:27, 13:29, 14:3, 14:6, 14:7, 14:8, 14:10, 14:12, 14:14, 14:15, 14:21, 14:22, 14:23, 15:4, 15:13, 24:29, 25:10, 68:15, 73:22, 74:22, 78:28, 79:5, 79:7, 79:10, 79:11, 79:14, 79:22, 81:20, 81:21, 81:22, 81:25, 82:1, 83:6, 84:7, 84:15, 84:16, 88:6, 88:8, 89:25, 89:29, 90:1, 90:5, 90:6, 90:8, 90:12, 90:15, 90:19, 90:24, 90:25, 90:27, 90:29, 91:12, 91:14, 91:16, 91:29, 92:1, 92:8, 92:12, 92:21, 92:25, 93:4, 94:4, 94:7, 94:8, 94:15, 94:21, 103:24, 104:2, 104:10, 105:9, 105:19, 106:28, 107:4, 107:27, 108:7, 108:11, 108:15, 108:21, 109:9, 109:17, 109:29, 110:11, 110:27, 111:4, 111:5, 111:25, 112:1, 112:8, 112:15, 112:22, 113:1, 113:5, 113:6, 113:7, 122:12, 148:16, 148:22, 148:28, 149:5, 149:23, 150:27, 152:28, 155:14, 156:15, 158:8, 163:24, 179:15  
**complaints** [16] - 6:16, 12:8, 12:18, 12:24, 12:26, 14:17, 14:24, 14:27, 83:12, 84:23, 91:6, 91:8, 92:9, 106:14, 106:20, 106:24  
**complete** [2] - 54:13, 108:3  
**completed** [6] - 77:8, 140:7, 147:16, 164:27, 179:22, 180:9

**completely** [4] - 95:18, 159:26, 186:28, 199:13  
**completing** [1] - 116:11  
**complex** [2] - 69:14, 97:21  
**complicated** [1] - 183:28  
**comprehensive** [2] - 138:5, 181:24  
**concealed** [1] - 83:16  
**conceded** [1] - 212:12  
**concentrating** [1] - 225:27  
**concern** [13] - 20:3, 20:9, 21:11, 21:12, 41:18, 57:6, 61:2, 95:7, 125:28, 132:13, 150:6, 155:27, 160:5  
**concerned** [11] - 21:16, 21:19, 112:20, 117:22, 153:13, 154:23, 155:10, 155:16, 160:8, 173:1, 173:2  
**concerning** [6] - 34:5, 35:17, 106:21, 108:15, 108:29, 139:23  
**concerns** [9] - 53:11, 57:2, 61:4, 61:23, 61:27, 72:6, 84:7, 132:13, 213:2  
**conclude** [2] - 103:20, 159:27  
**concluded** [6] - 8:15, 37:29, 39:10, 103:21, 131:28, 182:22  
**conclusion** [7] - 11:1, 26:29, 103:20, 104:16, 109:12, 136:7, 159:29  
**concrete** [1] - 29:10  
**condition** [1] - 134:23  
**conduct** [18] - 36:24, 67:13, 79:16, 87:7, 87:10, 87:14, 87:22, 94:16, 103:7, 106:21, 107:1, 110:19, 111:26, 117:23, 178:4, 185:13, 186:24, 188:25  
**conducted** [3] - 55:11, 167:15, 183:13  
**conference** [6] - 36:12, 36:15, 37:12,

37:15, 42:18, 146:2  
**conferences** [5] - 6:28, 7:3, 7:14, 37:6, 206:29  
**Confidential** [5] - 184:9, 184:16, 186:6, 194:21, 200:14  
**confidential** [12] - 6:17, 6:21, 34:3, 182:3, 200:13, 203:3, 203:7, 203:10, 203:15, 204:3, 207:19, 212:4  
**confined** [1] - 48:24  
**confirm** [9] - 47:24, 79:27, 81:3, 92:18, 92:23, 107:14, 163:24, 179:12, 190:20  
**confirmed** [13] - 73:27, 73:28, 75:22, 75:23, 76:1, 80:15, 88:23, 98:24, 98:26, 99:29, 104:19, 109:26, 190:25  
**confirming** [1] - 18:11  
**confused** [2] - 27:17, 47:6  
**CONLON** [1] - 2:24  
**connected** [2] - 180:15, 181:20  
**connection** [4] - 62:17, 217:24, 217:25, 217:28  
**connections** [3] - 126:11, 139:24, 153:25  
**connectivity** [1] - 86:1  
**CONOR** [2] - 2:9, 3:7  
**Conor** [1] - 63:16  
**conscious** [5] - 66:11, 154:26, 207:4, 208:17, 208:22  
**consent** [6] - 100:7, 109:20, 109:23, 110:1, 110:2  
**consented** [3] - 79:18, 189:24, 189:28  
**consenting** [1] - 190:21  
**consequence** [1] - 93:12  
**consider** [7] - 69:4, 78:14, 78:16, 78:18, 93:5, 99:13, 216:16  
**considerable** [1] - 151:25  
**considerations** [3] -

23:18, 25:17, 26:4  
**considered** [4] - 73:24, 78:5, 80:17, 215:8  
**considering** [1] - 23:16  
**consistent** [2] - 156:28, 157:4  
**consists** [1] - 86:13  
**consolidated** [1] - 137:4  
**constitute** [2] - 92:3, 99:13  
**construing** [1] - 111:23  
**consult** [2] - 79:23, 159:1  
**consultation** [2] - 98:11, 138:17  
**consulting** [1] - 110:29  
**consumption** [1] - 196:16  
**contact** [25] - 12:20, 18:12, 39:11, 79:27, 112:19, 119:19, 123:8, 123:14, 125:24, 132:6, 139:27, 139:28, 142:13, 145:24, 149:14, 167:26, 183:22, 187:4, 188:29, 189:1, 195:9, 197:5, 198:24, 198:25, 223:21  
**contacted** [18] - 17:21, 39:28, 42:10, 82:13, 103:27, 109:1, 109:9, 128:22, 132:7, 138:20, 138:23, 147:25, 147:28, 166:18, 166:22, 166:27, 167:1, 194:22  
**contacting** [3] - 112:6, 124:8, 167:7  
**contacts** [4] - 123:11, 124:17, 124:25, 149:15  
**contained** [12] - 12:4, 13:13, 16:2, 19:27, 30:17, 58:19, 90:15, 105:8, 105:18, 171:17, 196:25, 208:28  
**containing** [1] - 90:12  
**contains** [1] - 13:15  
**contemporaneous** [2] - 148:26, 149:2  
**contemporaneousl**

**y** [2] - 52:21, 75:11  
**content** [2] - 78:28, 92:19  
**contents** [7] - 34:17, 36:9, 54:2, 57:13, 105:24, 107:3, 222:15  
**context** [9] - 127:29, 130:15, 152:5, 154:16, 166:17, 200:20, 212:8, 222:16, 225:13  
**continue** [2] - 22:24, 100:6  
**continuing** [2] - 100:13, 123:13  
**continuous** [1] - 72:12  
**contribute** [1] - 38:9  
**contributing** [1] - 38:12  
**contribution** [1] - 38:10  
**Control** [3] - 71:25, 113:23, 113:24  
**control** [3] - 134:28, 162:27, 163:3  
**convened** [1] - 146:14  
**conversation** [37] - 22:16, 22:18, 36:7, 38:5, 38:13, 38:21, 38:23, 45:4, 57:11, 62:4, 62:5, 62:7, 74:5, 75:9, 75:27, 77:14, 80:10, 80:11, 80:12, 84:27, 99:25, 109:25, 120:27, 123:22, 128:16, 129:28, 131:18, 136:18, 136:21, 138:2, 138:29, 145:29, 146:3, 156:13, 174:21, 182:8, 182:28  
**conversations** [2] - 38:3, 123:29  
**conversion** [1] - 79:4  
**convert** [1] - 79:5  
**convey** [1] - 150:27  
**conveyed** [3] - 150:3, 150:9, 150:14  
**conveying** [3] - 151:16, 151:20, 158:7  
**convicted** [1] - 48:12  
**conviction** [1] - 50:3  
**convincing** [2] - 38:19, 44:7  
**convoluted** [1] - 145:26  
**Conway** [2] - 166:23, 166:26

**cooperating** [1] - 17:22  
**cooperation** [1] - 208:21  
**copied** [2] - 11:8, 135:6  
**copies** [2] - 37:24, 40:14  
**copy** [31] - 9:1, 9:21, 11:13, 14:6, 14:7, 14:14, 15:11, 15:12, 15:24, 19:7, 19:8, 19:11, 25:11, 39:22, 43:25, 47:19, 53:26, 66:20, 68:4, 71:16, 80:29, 91:5, 106:23, 126:17, 126:26, 134:4, 142:10, 186:22, 198:8, 213:17, 218:24  
**coroner's** [1] - 193:20  
**correct** [231] - 7:15, 9:7, 9:12, 9:15, 9:16, 13:19, 14:26, 15:7, 17:7, 17:8, 17:12, 17:13, 18:3, 18:4, 23:12, 25:5, 27:4, 27:11, 27:14, 27:15, 27:19, 33:11, 33:16, 33:19, 33:20, 33:26, 34:7, 34:11, 34:12, 35:9, 35:13, 35:22, 35:26, 36:1, 36:4, 36:13, 39:27, 40:10, 41:1, 41:3, 41:6, 41:13, 41:14, 41:21, 42:2, 44:12, 44:21, 48:27, 50:12, 50:15, 51:11, 51:12, 51:27, 52:1, 52:4, 52:8, 52:10, 52:13, 52:17, 63:24, 63:27, 65:9, 65:14, 65:18, 65:19, 66:3, 72:26, 76:26, 79:3, 79:13, 80:20, 81:27, 82:15, 83:12, 83:26, 83:27, 84:1, 88:17, 88:18, 91:2, 91:27, 91:29, 92:27, 92:28, 95:19, 98:18, 101:11, 101:12, 102:19, 106:15, 116:28, 117:1, 117:7, 117:16, 118:2, 118:10, 118:22, 119:8, 119:15, 119:25, 120:7, 120:10, 121:11, 121:24, 122:2, 123:7,

123:18, 124:20, 124:21, 124:22, 124:28, 124:29, 125:27, 126:1, 126:10, 126:16, 126:22, 127:4, 127:12, 127:16, 130:27, 131:27, 136:8, 137:9, 138:10, 139:29, 140:1, 142:17, 142:23, 146:23, 147:15, 147:19, 147:20, 148:18, 148:20, 148:25, 149:6, 149:16, 149:21, 149:27, 150:2, 150:8, 150:13, 150:17, 150:21, 151:1, 152:2, 153:29, 157:1, 157:9, 160:2, 160:6, 163:28, 166:26, 171:2, 171:3, 171:13, 176:5, 178:1, 178:2, 178:5, 178:6, 178:16, 178:20, 179:4, 179:8, 179:15, 179:16, 179:20, 179:25, 179:26, 179:29, 180:5, 180:6, 180:13, 180:18, 180:20, 180:21, 180:25, 181:2, 181:4, 181:5, 181:10, 181:12, 181:13, 181:19, 181:21, 181:22, 183:1, 187:11, 187:12, 187:23, 187:29, 188:22, 188:23, 188:28, 189:2, 189:7, 189:19, 190:6, 190:9, 190:15, 190:17, 190:18, 190:22, 190:23, 190:25, 191:6, 191:7, 191:9, 191:19, 191:23, 191:24, 191:29, 192:2, 192:3, 192:7, 192:11, 197:18, 198:1, 198:2, 198:26, 202:9, 209:2, 212:10, 212:20, 213:18, 213:21, 213:28, 213:29  
**corrected** [1] - 200:24  
**correcting** [1] - 143:18  
**correctly** [1] - 111:23  
**correspond** [1] - 21:26

**correspondence** [9] - 8:14, 17:5, 21:22, 27:25, 28:6, 49:24, 56:8, 81:6, 180:27  
**corresponding** [1] - 17:9  
**corroborated** [2] - 156:4, 157:27  
**counsel** [2] - 81:17, 217:12  
**counsellor** [1] - 125:15  
**counted** [1] - 41:13  
**County** [8] - 31:13, 32:12, 32:14, 32:18, 33:2, 125:16, 177:4, 177:9  
**couple** [5] - 24:19, 50:14, 95:1, 153:9, 224:4  
**courier** [2] - 206:14, 206:16  
**course** [32] - 31:17, 33:22, 37:21, 38:29, 44:25, 50:10, 53:21, 60:20, 64:17, 70:16, 74:29, 81:8, 81:14, 84:27, 92:18, 92:29, 101:18, 109:8, 110:1, 110:2, 118:20, 120:2, 120:13, 122:14, 123:28, 130:19, 144:9, 157:24, 183:3, 183:21, 225:6, 227:5  
**Court** [14] - 150:10, 189:5, 189:12, 189:25, 190:1, 190:8, 190:10, 190:22, 191:1, 191:8, 196:26, 212:8, 212:19, 220:8  
**COURT** [2] - 1:13, 2:3  
**court** [7] - 69:20, 69:21, 102:28, 119:20, 127:7, 162:6, 193:20  
**courteous** [3] - 141:3, 154:10, 199:17  
**courtesy** [2] - 184:4, 199:20  
**courthouse** [1] - 127:11  
**courts** [1] - 165:15  
**cover** [3] - 34:3, 45:9, 142:7  
**covered** [6] - 87:29, 96:20, 129:5, 132:11, 155:1, 166:18  
**covering** [1] - 165:20  
**covers** [4] - 67:17,

67:19, 136:6, 171:4  
**COX** [1] - 2:16  
**crash** [2] - 155:8, 220:13  
**created** [6] - 25:28, 76:27, 76:28, 77:25, 78:26, 80:24  
**creates** [1] - 86:8  
**credence** [1] - 210:12  
**credibility** [1] - 126:3  
**credible** [3] - 133:20, 160:15, 210:22  
**creeping** [1] - 102:12  
**crime** [6] - 88:16, 116:23, 135:18, 165:19, 165:20, 168:1  
**crimes** [1] - 169:20  
**criminal** [30] - 10:1, 69:17, 86:25, 97:24, 103:9, 103:12, 111:21, 129:3, 129:26, 140:29, 150:28, 158:8, 163:1, 178:4, 183:17, 185:2, 185:13, 185:24, 185:25, 186:24, 188:20, 191:4, 194:1, 207:20, 207:22, 207:28, 208:1, 208:27, 212:28, 213:11  
**criteria** [8] - 55:28, 56:13, 57:17, 59:16, 68:26, 110:28, 111:1, 111:29  
**criticise** [1] - 66:14  
**criticising** [1] - 45:16  
**CROSS** [26] - 4:5, 4:6, 4:11, 4:16, 4:18, 4:22, 4:23, 4:29, 4:30, 4:32, 5:3, 5:8, 5:9, 6:7, 30:22, 40:25, 56:22, 63:15, 81:16, 100:29, 133:18, 148:9, 163:21, 170:8, 193:2, 211:8  
**cross** [6] - 6:5, 18:15, 67:25, 199:23, 200:27, 224:25  
**cross-examination** [3] - 199:23, 200:27, 224:25  
**cross-examine** [1] - 6:5  
**cross-examined** [1] - 18:15  
**CROSS-EXAMINED** [26] - 4:5, 4:6, 4:11, 4:16, 4:18, 4:22, 4:23,

4:29, 4:30, 4:32, 5:3, 5:8, 5:9, 6:7, 30:22, 40:25, 56:22, 63:15, 81:16, 100:29, 133:18, 148:9, 163:21, 170:8, 193:2, 211:8  
**cross-purposes** [1] - 67:25  
**crying** [1] - 156:25  
**current** [3] - 21:29, 116:22, 133:29  
**custody** [2] - 84:9, 84:22  
**cut** [1] - 75:16

---

## D

---

**D/Garda** [1] - 174:13  
**dad** [1] - 154:28  
**daily** [1] - 46:9  
**Daly** [4] - 56:24, 60:19, 61:10, 64:9  
**DALY** [9] - 2:19, 4:16, 56:23, 56:24, 60:22, 61:5, 61:9, 61:12, 62:9  
**danger** [1] - 19:25  
**dangerous** [3] - 161:19, 161:21, 161:29  
**DANIEL** [1] - 3:8  
**Darren** [4] - 58:15, 65:1, 107:26, 108:28  
**DARREN** [2] - 4:20, 65:3  
**data** [1] - 168:1  
**date** [39] - 14:3, 24:13, 24:24, 30:7, 32:9, 33:8, 35:13, 102:28, 107:13, 116:9, 130:25, 130:27, 130:28, 162:5, 164:25, 164:28, 169:11, 176:29, 178:22, 180:19, 188:5, 188:12, 188:14, 189:15, 189:17, 193:19, 194:10, 194:23, 198:8, 198:10, 198:13, 199:23, 200:12, 202:10, 202:15, 202:18, 202:19, 225:2  
**dated** [9] - 77:5, 77:9, 89:15, 108:25, 146:28, 179:23, 184:25, 190:3, 192:5

**dates** [7] - 24:17, 178:12, 187:20, 188:3, 196:23, 197:1, 197:12  
**dating** [1] - 181:18  
**Dave** [1] - 156:21  
**DAY** [1] - 1:18  
**day-to-day** [1] - 174:25  
**daybook** [3] - 71:16, 75:12, 100:1  
**days** [25] - 21:13, 82:20, 120:5, 127:13, 143:6, 144:11, 153:9, 155:1, 164:4, 176:7, 183:26, 184:1, 195:18, 195:24, 195:27, 196:2, 196:3, 196:5, 197:5, 197:13, 201:16, 209:19, 211:23, 212:15  
**deal** [48] - 10:21, 12:11, 13:6, 14:17, 15:7, 15:14, 15:17, 57:27, 58:5, 58:7, 73:26, 73:27, 76:18, 79:19, 88:18, 89:12, 92:9, 92:13, 92:15, 93:25, 94:25, 101:6, 101:7, 101:28, 102:4, 102:9, 102:15, 111:27, 112:5, 113:5, 113:7, 118:6, 119:12, 123:8, 125:8, 125:10, 125:11, 127:5, 131:2, 137:17, 146:12, 146:14, 147:5, 160:29, 167:25, 167:26, 199:24  
**dealing** [13] - 19:24, 30:15, 47:8, 56:26, 82:22, 88:5, 111:10, 123:21, 131:8, 146:10, 161:15, 167:28  
**dealings** [6] - 8:17, 22:8, 34:25, 62:25, 169:21, 170:1  
**deals** [8] - 14:23, 58:6, 81:24, 82:10, 91:5, 91:10, 91:13, 91:22  
**dealt** [23] - 7:20, 10:11, 12:28, 15:19, 17:14, 20:25, 21:15, 26:2, 57:23, 59:19, 59:22, 59:23, 79:19, 79:28, 90:25, 92:19, 94:9, 101:9, 109:16, 109:24, 126:13, 129:12, 145:13  
**Dear** [1] - 107:26  
**death** [24] - 45:22, 46:22, 46:28, 55:28, 56:14, 57:18, 59:11, 62:1, 65:26, 67:14, 75:29, 78:3, 84:3, 84:7, 84:29, 85:3, 86:8, 87:7, 87:14, 87:22, 95:15, 95:26, 160:28, 222:20  
**debate** [1] - 44:29  
**December** [15] - 165:17, 177:14, 177:22, 185:10, 186:8, 186:11, 186:15, 188:16, 198:9, 200:17, 200:18, 201:9, 206:27, 213:25, 213:26  
**decide** [10] - 59:25, 67:3, 69:7, 69:8, 70:4, 73:20, 102:18, 102:22, 102:26, 114:4  
**decided** [4] - 12:3, 186:11, 186:17, 208:19  
**deciding** [1] - 102:3  
**deciphered** [1] - 107:29  
**decision** [17] - 66:12, 66:16, 66:25, 68:29, 70:9, 70:19, 70:28, 71:2, 83:11, 83:18, 83:25, 95:9, 102:9, 103:7, 111:28, 115:11, 194:20  
**decisions** [2] - 66:26, 68:25  
**decline** [3] - 69:29, 70:12, 102:14  
**deemed** [2] - 110:27, 191:16  
**deficiencies** [1] - 119:10  
**defined** [2] - 11:26, 87:9  
**defines** [1] - 86:13  
**definitely** [1] - 31:4  
**definition** [5] - 45:8, 86:17, 87:29, 99:14, 101:25  
**degree** [2] - 87:9, 113:13  
**delay** [10] - 191:9, 191:10, 191:12, 191:14, 199:28, 212:6, 212:13, 213:19, 213:20, 224:8  
**delayed** [2] - 199:25, 226:24  
**delegated** [5] - 52:2, 65:16, 97:12, 97:14, 97:22  
**delegates** [1] - 96:23  
**delegation** [2] - 96:24, 97:25  
**deliberately** [1] - 65:27  
**deliver** [3] - 182:6, 203:16, 206:12  
**delivered** [2] - 202:25, 206:17  
**delivery** [3] - 203:12, 203:13, 206:9  
**demeanour** [2] - 151:2  
**department** [1] - 80:29  
**dependent** [1] - 109:20  
**deploy** [1] - 83:2  
**depth** [1] - 49:21  
**deputy** [4] - 74:8, 74:18, 74:19, 105:23  
**describe** [1] - 119:5  
**described** [5] - 39:7, 53:20, 59:10, 111:2, 148:23  
**describing** [1] - 119:29  
**deserved** [1] - 184:4  
**designate** [1] - 74:25  
**designated** [3] - 51:25, 65:6, 84:11  
**desist** [1] - 185:18  
**desk** [9] - 8:5, 8:28, 19:14, 19:15, 30:17, 48:8, 83:8, 85:25, 201:8  
**DESMOND** [1] - 2:28  
**desperate** [1] - 20:15  
**despite** [4] - 73:21, 88:6, 88:8, 211:20  
**destroyed** [1] - 83:16  
**detached** [1] - 163:7  
**detail** [10] - 38:7, 42:24, 53:23, 81:11, 137:10, 139:4, 139:19, 173:3, 209:6, 216:11  
**detailed** [3] - 9:28, 25:8, 186:25  
**details** [17] - 13:5, 24:7, 24:11, 24:15, 32:8, 34:21, 39:25, 108:12, 113:28, 114:4, 130:29, 178:13, 187:17, 187:21, 189:1, 193:14, 198:24  
**DETECTIVE** [3] - 5:1, 164:21, 170:8  
**Detective** [8] - 164:17, 166:18, 167:12, 168:28, 173:21, 175:24, 176:2, 176:17  
**detective** [16] - 10:19, 32:14, 32:16, 32:29, 37:19, 37:29, 138:16, 164:23, 165:17, 165:18, 166:16, 167:5, 167:27, 170:11, 172:14, 172:15  
**determine** [4] - 68:27, 70:14, 110:24, 206:13  
**development** [3] - 121:5, 164:7, 196:1  
**developments** [1] - 192:20  
**diaries** [1] - 50:16  
**DIARMAID** [1] - 2:6  
**diary** [17] - 40:2, 40:7, 40:9, 51:4, 51:10, 51:13, 173:13, 176:3, 193:6, 193:13, 193:14, 193:18, 193:24, 206:22, 206:23, 224:3  
**dictate** [1] - 198:3  
**dictated** [8] - 23:19, 23:21, 25:25, 25:26, 25:29, 26:8, 26:28, 26:29  
**difference** [1] - 96:5  
**different** [18] - 37:28, 67:27, 76:10, 76:16, 96:12, 131:5, 132:26, 142:9, 161:28, 178:14, 179:7, 186:15, 186:28, 187:21, 205:11, 205:12, 206:29  
**difficult** [9] - 69:15, 111:11, 132:29, 135:26, 161:11, 161:26, 162:1, 215:29, 222:22  
**difficulties** [6] - 111:14, 183:24, 185:25, 208:4, 211:24, 213:7  
**difficulty** [8] - 48:14, 111:24, 126:25, 183:27, 185:27, 194:27, 198:12, 211:26  
**DIGNAM** [18] - 2:9, 4:18, 4:23, 5:9, 63:15, 63:16, 64:25, 100:27, 100:29, 101:1, 107:7, 159:11, 175:27, 211:5, 211:8, 211:10, 214:5, 217:3  
**Dignam** [3] - 63:16, 107:13, 108:7  
**direct** [3] - 57:15, 84:10, 140:24  
**directed** [3] - 107:21, 133:10, 190:12  
**directing** [1] - 41:9  
**direction** [3] - 21:21, 48:7  
**directive** [18] - 46:4, 46:6, 49:25, 66:18, 66:19, 66:23, 67:4, 67:13, 67:15, 67:24, 67:26, 67:28, 68:9, 86:15, 106:16, 106:26, 170:29  
**Directive** [1] - 106:8  
**directives** [2] - 133:24, 194:3  
**directly** [6] - 14:24, 77:1, 82:13, 91:9, 113:22, 139:25  
**DIRECTLY** [10] - 4:10, 4:15, 4:28, 5:2, 32:6, 51:22, 65:3, 116:6, 164:22, 176:27  
**director** [6] - 74:8, 74:16, 74:18, 74:19, 76:8, 105:23  
**Director** [2] - 65:7, 108:29  
**disagreement** [5] - 122:14, 122:22, 130:19, 149:11, 199:1  
**disallow** [1] - 60:19  
**discharge** [1] - 67:19  
**disciplinary** [19] - 6:15, 7:21, 10:2, 10:3, 17:6, 20:4, 34:28, 178:4, 183:18, 185:14, 188:26, 188:27, 189:13, 191:4, 194:21, 201:7, 202:8, 207:20, 212:27  
**Disciplinary** [1] - 177:28  
**discipline** [16] - 185:1, 185:23, 186:22, 189:24, 189:29, 191:13, 193:27, 193:29, 197:17, 197:20,

197:21, 198:27,  
198:29, 201:10,  
213:13, 219:7  
**disclose** [4] - 120:9,  
121:12, 164:5, 164:9  
**disclosed** [1] - 62:13  
**discloses** [1] -  
102:19  
**disclosure** [5] - 52:6,  
52:27, 54:6, 63:13,  
215:24  
**Disclosure** [1] -  
55:10  
**DISCLOSURES** [2] -  
1:3, 1:4  
**disclosures** [1] -  
62:1  
**discontinuance** [1] -  
102:25  
**discontinue** [1] -  
103:13  
**discontinued** [2] -  
103:23, 111:3  
**discourteous** [1] -  
12:19  
**discredit** [1] - 185:17  
**discretion** [1] - 102:6  
**discuss** [8] - 76:6,  
76:9, 104:4, 134:8,  
178:18, 187:6,  
198:20, 198:22  
**discussed** [24] -  
9:24, 12:2, 16:24,  
22:12, 30:14, 37:21,  
38:11, 61:16, 61:17,  
74:21, 81:9, 105:24,  
105:25, 121:18,  
125:3, 125:4, 132:22,  
146:1, 153:16,  
169:14, 169:16,  
174:17, 174:29, 175:5  
**discussing** [3] -  
153:4, 154:4, 169:17  
**discussion** [19] -  
10:4, 10:8, 10:10,  
10:12, 10:15, 10:29,  
15:25, 15:27, 22:5,  
38:9, 38:21, 43:17,  
63:19, 76:3, 105:25,  
108:28, 109:5,  
114:23, 205:25  
**discussions** [2] -  
192:24, 226:11  
**disfigurement** [1] -  
86:9  
**dispute** [2] - 161:12,  
161:21  
**disrepute** [2] - 91:23,  
91:26  
**disrespect** [1] -  
170:17  
**disruptive** [1] - 162:9  
**distinction** [2] - 12:9,  
83:13  
**distinguish** [1] -  
98:22  
**distracted** [1] -  
156:29  
**distressed** [2] -  
140:23, 151:14  
**distributed** [1] -  
37:25  
**district** [28] - 6:11,  
8:13, 8:22, 10:22,  
11:10, 15:12, 33:4,  
33:5, 33:7, 33:9,  
33:13, 34:18, 35:24,  
41:4, 41:6, 42:20,  
42:22, 45:21, 49:16,  
49:17, 49:18, 50:4,  
97:1, 97:29, 135:3,  
202:26, 202:27  
**District** [2] - 150:10,  
220:8  
**districts** [2] - 11:7,  
42:4  
**disturbance** [1] -  
36:2  
**division** [20] - 11:3,  
16:12, 16:18, 17:26,  
24:22, 28:26, 30:24,  
48:1, 49:13, 97:27,  
136:12, 142:7,  
147:18, 154:8,  
165:18, 165:20,  
177:14, 209:27,  
210:8, 210:11  
**divisional** [15] - 6:11,  
7:5, 7:6, 24:15, 24:25,  
28:12, 32:19, 36:18,  
116:22, 126:21,  
135:7, 165:7, 165:9,  
202:27  
**divisions** [1] - 44:20  
**divorced** [1] - 24:19  
**DMR** [3] - 113:23,  
113:27, 114:13  
**Dockery** [1] - 163:23  
**DOCKERY** [9] - 2:28,  
4:30, 148:3, 148:9,  
148:10, 158:18,  
175:26, 211:4, 216:23  
**Dockery's** [1] -  
163:22  
**docs** [1] - 74:25  
**document** [16] -  
58:13, 58:14, 58:16,  
58:17, 58:19, 77:1,  
112:26, 135:21,  
178:9, 178:28, 179:2,  
182:10, 187:8,  
206:13, 215:23  
**documentary** [1] -  
135:20  
**documentation** [10] -  
58:12, 115:3, 134:11,  
167:17, 178:25,  
179:8, 180:1, 180:15,  
181:15, 211:28  
**documented** [4] -  
71:2, 71:12, 133:27,  
134:1  
**documenting** [1] -  
69:22  
**documents** [15] -  
53:3, 67:22, 71:21,  
73:17, 167:14,  
167:18, 179:11,  
180:8, 204:14,  
205:16, 205:21,  
206:11, 215:23,  
225:13, 227:2  
**Doherty** [2] - 98:17,  
98:21  
**Doherty's** [1] -  
180:19  
**domestic** [9] - 72:6,  
161:1, 161:12,  
161:17, 161:20,  
162:1, 204:27, 205:13  
**DONAL** [2] - 2:10,  
50:24  
**DONALD** [1] - 2:12  
**done** [41] - 10:5,  
10:22, 20:16, 21:18,  
23:9, 44:4, 44:16,  
44:17, 47:21, 60:7,  
76:12, 82:3, 105:12,  
110:21, 114:29,  
133:20, 133:22,  
133:23, 136:15,  
138:16, 141:18,  
141:20, 141:23,  
145:16, 146:19,  
146:20, 147:2,  
151:13, 151:14,  
161:18, 162:25,  
186:10, 186:11,  
191:17, 192:22,  
203:11, 203:12,  
203:13, 206:12,  
218:10  
**Donegal** [51] - 6:11,  
11:3, 16:12, 16:18,  
24:22, 31:11, 31:12,  
32:12, 32:15, 32:18,  
33:2, 33:10, 33:13,  
33:15, 34:5, 35:17,  
35:18, 41:5, 43:6,  
44:3, 48:1, 48:13,  
48:14, 48:15, 48:16,  
48:21, 71:29, 72:5,  
116:15, 116:24,  
117:4, 125:20,  
125:23, 142:7,  
147:18, 154:26,  
162:20, 165:18,  
180:24, 183:22,  
184:19, 195:12,  
202:21, 202:26,  
203:20, 218:2,  
218:14, 221:14,  
221:21, 223:27,  
226:13  
**Donna** [3] - 225:17,  
225:22, 226:1  
**doors** [8] - 99:2,  
117:26, 133:2,  
134:26, 152:7,  
155:28, 155:29,  
162:29  
**doubt** [2] - 141:3,  
147:2  
**down** [32] - 24:5,  
25:28, 29:4, 40:5,  
58:2, 59:28, 70:13,  
76:13, 85:21, 88:13,  
94:10, 97:8, 99:28,  
105:24, 106:11,  
111:16, 114:25,  
118:18, 121:1,  
127:19, 128:15,  
129:9, 129:26,  
130:23, 134:3,  
139:13, 139:17,  
151:8, 155:2, 194:9,  
195:19  
**DPP** [1] - 100:7  
**draft** [3] - 24:3,  
28:24, 107:18  
**drafted** [2] - 23:8,  
23:12  
**drafting** [1] - 17:6  
**drag** [1] - 159:17  
**drastic** [1] - 65:25  
**draw** [1] - 83:13  
**drives** [1] - 125:20  
**drug** [1] - 162:16  
**Drumacanoo** [1] -  
117:5  
**Dublin** [5] - 32:23,  
32:24, 113:23,  
137:20, 162:17  
**DUBLIN** [6] - 1:17,  
2:14, 2:17, 2:26, 2:30,  
3:9  
**due** [14] - 12:5,  
54:11, 60:20, 70:16,  
73:29, 75:24, 76:2,  
88:24, 95:22, 97:8,  
191:9, 191:10,  
195:25, 197:10  
**Duffy** [1] - 7:5  
**Dunkineely** [1] -  
32:18  
**Dunn** [1] - 60:20  
**duration** [2] - 64:1,  
98:2  
**during** [17] - 30:24,  
33:22, 37:21, 38:29,  
53:21, 64:17, 76:7,  
84:27, 118:20,  
120:13, 123:11,  
123:28, 124:17,  
132:14, 149:10,  
168:19, 218:14  
**DURKIN** [1] - 2:28  
**Durkin** [25] - 33:14,  
33:18, 34:4, 34:24,  
35:7, 35:20, 35:23,  
39:9, 39:11, 39:14,  
43:4, 47:9, 47:10,  
47:16, 47:24, 183:22,  
195:11, 195:12,  
195:13, 195:17,  
220:10, 221:21,  
221:25, 222:9, 226:12  
**Durkin's** [3] - 35:10,  
47:18, 180:23  
**duties** [10] - 33:12,  
48:8, 48:24, 49:27,  
85:27, 86:2, 177:5,  
177:8, 220:16, 223:23  
**duty** [25] - 65:12,  
76:20, 78:9, 78:16,  
84:23, 95:4, 95:16,  
164:29, 165:12,  
165:14, 165:15,  
165:22, 165:24,  
166:3, 166:23,  
168:14, 172:7,  
172:24, 173:6,  
177:11, 193:19,  
195:9, 195:10  
**DVD** [2] - 52:19,  
63:29  
**DVDs** [3] - 52:19,  
52:20  
**DWYER** [1] - 2:23  
**DÁIL** [1] - 1:5

---

## E

---

**EARLSFORT** [1] -  
2:17  
**early** [5] - 96:4, 99:7,  
119:28, 141:14,  
194:10  
**easy** [2] - 45:14,

197:14  
**economic** [1] - 155:8  
**ectopic** [1] - 220:20  
**effect** [3] - 28:18,  
56:16, 82:10  
**effectively** [4] -  
98:16, 200:20,  
201:26, 208:28  
**effort** [1] - 184:18  
**eight** [2] - 132:9,  
144:19  
**either** [23] - 20:9,  
47:11, 73:25, 80:1,  
80:4, 80:5, 84:22,  
87:16, 87:26, 89:18,  
91:8, 95:16, 103:3,  
103:8, 108:18, 137:6,  
142:6, 145:9, 145:10,  
146:5, 183:17, 206:2,  
210:4  
**either/or** [1] - 130:10  
**elapsed** [1] - 186:8  
**eldest** [1] - 125:13  
**electronic** [6] - 19:7,  
77:18, 83:9, 117:25,  
134:26, 139:10  
**element** [4] - 9:17,  
82:19, 93:6, 95:23  
**ELIZABETH** [1] - 2:7  
**email** [24] - 15:16,  
17:14, 17:16, 19:24,  
27:20, 27:22, 27:24,  
28:19, 39:17, 47:18,  
73:18, 77:15, 77:21,  
80:16, 96:3, 98:26,  
107:16, 109:26,  
136:27, 142:11,  
144:3, 144:4, 187:10,  
224:6  
**emailed** [1] - 39:22  
**emanating** [1] -  
181:3  
**embellished** [1] -  
194:24  
**EMcG** [2] - 73:27,  
75:22  
**emerged** [1] - 39:26  
**emergency** [2] -  
82:11, 82:19  
**emphasis** [2] -  
153:26, 154:15  
**emphasise** [1] -  
101:12  
**emphasised** [1] -  
99:23  
**employed** [1] -  
125:14  
**encapsulate** [1] -  
137:7  
**encounter** [1] -  
225:16  
**encountered** [1] -  
48:18  
**end** [15] - 8:14,  
57:12, 69:22, 74:4,  
74:11, 75:15, 77:1,  
86:16, 112:25,  
159:25, 162:12,  
167:29, 168:5,  
175:18, 202:15  
**endeavour** [1] -  
83:17  
**engage** [2] - 83:18,  
208:19  
**engaged** [3] - 84:24,  
177:4, 177:7  
**engaging** [1] -  
184:21  
**engineered** [2] -  
218:5, 222:28  
**engineering** [1] -  
139:11  
**ENGLISH** [1] - 2:23  
**English** [9] - 25:8,  
45:27, 165:21,  
165:25, 166:2, 167:1,  
168:14, 169:3, 180:9  
**ensued** [2] - 211:24,  
211:25  
**ensure** [4] - 14:13,  
69:3, 95:17, 162:29  
**ensuring** [1] - 67:5  
**entail** [1] - 117:20  
**entails** [1] - 117:21  
**enter** [3] - 25:23,  
170:12, 171:6  
**entered** [11] - 51:12,  
164:26, 184:9,  
184:16, 186:6, 190:8,  
194:3, 195:6, 207:18,  
207:23, 212:4  
**entire** [1] - 44:20  
**entirely** [8] - 44:19,  
66:28, 73:23, 88:12,  
89:7, 92:14, 92:28,  
102:5  
**entitled** [3] - 68:19,  
170:24, 201:17  
**entries** [3] - 40:2,  
51:5, 176:3  
**entry** [8] - 51:10,  
74:11, 75:26, 76:1,  
80:26, 176:6, 193:23  
**envelope** [2] - 187:9,  
198:25  
**EQUALITY** [1] - 1:9  
**equipment** [1] -  
136:1  
**erroneous** [6] -  
78:16, 78:18, 101:21,  
101:22, 101:24  
**erroneously** [1] -  
85:21  
**error** [1] - 187:26  
**essence** [1] - 149:29  
**essentially** [11] -  
34:2, 57:10, 57:11,  
67:1, 71:5, 114:1,  
178:7, 181:23,  
186:19, 188:18,  
200:10  
**establish** [2] -  
132:26, 196:6  
**ESTABLISHED** [1] -  
1:8  
**established** [2] -  
130:24, 149:28  
**estimate** [1] - 115:8  
**etcetera** [5] - 18:12,  
25:21, 37:7, 156:16,  
160:29  
**Eugene** [5] - 71:28,  
72:4, 75:22, 75:27,  
180:3  
**evaporated** [1] -  
21:12  
**evening** [8] - 23:10,  
118:27, 141:23,  
144:18, 156:8,  
165:24, 166:2, 166:28  
**event** [14] - 13:8,  
13:12, 37:6, 76:19,  
77:21, 104:4, 104:5,  
111:22, 142:29,  
145:17, 145:21,  
205:5, 205:6  
**events** [3] - 81:8,  
88:15, 208:25  
**EVIDENCE** [1] - 1:9  
**evidence** [58] -  
25:20, 30:7, 42:6,  
47:7, 48:7, 57:15,  
64:7, 69:28, 82:25,  
83:2, 83:3, 83:15,  
88:27, 89:3, 89:28,  
96:21, 100:18, 101:4,  
101:18, 101:20,  
101:26, 102:12,  
103:25, 104:7, 105:7,  
105:11, 105:27,  
105:28, 108:24,  
117:12, 138:8,  
147:20, 148:15,  
154:1, 156:4, 156:5,  
157:5, 157:25, 158:5,  
166:7, 172:9, 172:17,  
173:22, 174:7,  
203:27, 203:29,  
204:2, 205:29, 216:6,  
216:7, 219:16,  
222:17, 223:8,  
224:21, 225:12,  
226:23, 226:26, 227:5  
**evidence-in-chief** [1]  
- 174:7  
**exact** [4] - 9:27, 38:7,  
38:10, 42:24  
**exactly** [8] - 85:7,  
85:17, 89:8, 92:16,  
114:21, 131:16,  
221:29  
**exam** [1] - 219:22  
**examination** [7] -  
78:2, 83:3, 106:9,  
199:23, 200:2,  
200:27, 224:25  
**examine** [3] - 6:5,  
83:28, 84:15  
**examined** [3] -  
18:15, 76:24, 115:4  
**EXAMINED** [43] -  
4:5, 4:6, 4:10, 4:11,  
4:12, 4:15, 4:16, 4:18,  
4:21, 4:22, 4:23, 4:24,  
4:28, 4:29, 4:30, 4:32,  
5:2, 5:3, 5:4, 5:8, 5:9,  
6:7, 30:22, 32:6,  
40:25, 51:1, 51:23,  
56:22, 63:15, 65:4,  
81:16, 100:29, 107:9,  
116:7, 133:18, 148:9,  
163:21, 164:22,  
170:8, 175:29,  
176:27, 193:2, 211:8  
**examines** [1] - 68:20  
**example** [8] - 26:5,  
70:17, 70:25, 93:20,  
94:15, 112:12,  
178:24, 226:19  
**examples** [1] - 95:2  
**exceed** [1] - 99:6  
**except** [2] - 174:4,  
203:22  
**excess** [2] - 69:16,  
115:7  
**exchange** [2] -  
156:7, 156:9  
**exclusively** [2] -  
65:22, 67:16  
**exercise** [1] - 147:19  
**exercised** [1] -  
139:27  
**exert** [1] - 185:18  
**exist** [1] - 98:6  
**existing** [1] - 117:18  
**expand** [1] - 122:19  
**expanded** [1] -  
128:17  
**expansion** [1] -  
129:7  
**expect** [4] - 83:5,  
95:8, 100:21, 105:20  
**expected** [2] -  
195:22, 195:23  
**expecting** [1] -  
175:10  
**experience** [7] -  
38:18, 45:1, 45:2,  
45:11, 45:17, 70:20,  
98:27  
**experienced** [1] -  
99:15  
**explain** [8] - 28:15,  
36:14, 39:2, 98:9,  
133:19, 183:14,  
187:27, 215:11  
**explained** [15] -  
36:20, 36:22, 36:23,  
53:22, 55:24, 55:29,  
56:2, 56:14, 101:10,  
149:8, 182:15,  
182:17, 183:8, 191:2,  
215:4  
**explaining** [4] -  
78:10, 86:15, 122:21,  
191:1  
**explains** [2] - 66:23,  
98:8  
**explanation** [9] -  
28:9, 128:4, 144:28,  
149:7, 200:9, 200:20,  
200:26, 215:6, 217:11  
**explicable** [1] -  
224:9  
**explicit** [1] - 226:29  
**explicitly** [2] - 76:7,  
225:26  
**express** [2] - 121:22,  
132:13  
**expressed** [7] -  
11:29, 15:28, 105:10,  
105:28, 107:12,  
121:19, 148:21  
**expressing** [1] - 20:9  
**extends** [1] - 97:26  
**extension** [1] -  
201:16  
**extent** [8] - 17:3,  
20:14, 86:22, 86:23,  
187:25, 223:3,  
225:19, 225:23  
**extra** [2] - 133:10,  
185:23  
**extract** [2] - 209:16,  
209:18  
**extracted** [2] - 209:3,  
209:14  
**extremely** [5] -  
53:14, 57:6, 57:20,  
61:27, 87:4

**eye** [1] - 153:25

---

## F

---

- facilitate** [1] - 198:25  
**fact** [46] - 13:16, 20:16, 27:28, 28:2, 39:21, 40:9, 41:26, 47:28, 48:11, 50:13, 62:12, 84:21, 85:8, 87:16, 87:18, 90:6, 92:24, 93:15, 97:26, 98:14, 99:1, 99:22, 104:18, 105:22, 117:13, 124:23, 125:4, 125:13, 137:18, 142:19, 144:6, 157:28, 163:26, 171:21, 182:16, 182:29, 183:29, 197:26, 198:27, 199:25, 207:12, 208:17, 208:27, 209:1, 219:14, 227:9  
**factor** [1] - 87:17  
**factors** [1] - 161:28  
**facts** [3] - 45:11, 70:16, 132:26  
**factual** [1] - 45:19  
**Fahy** [2] - 125:23, 125:24  
**failing** [1] - 12:20  
**failure** [2] - 211:12, 212:6  
**faint** [1] - 107:23  
**fair** [5] - 34:8, 44:22, 130:18, 160:11, 207:3  
**fairly** [7] - 9:28, 25:8, 138:19, 141:24, 142:8, 181:23, 202:28  
**fairness** [3] - 45:28, 101:29, 124:24  
**faith** [2] - 223:18, 223:19  
**fall** [3] - 10:2, 46:22, 84:21  
**familiar** [6] - 68:7, 70:24, 100:5, 100:11, 106:7, 197:11  
**family** [10] - 61:29, 125:14, 130:3, 130:10, 130:16, 139:23, 159:27, 185:17, 213:4, 222:18  
**far** [12] - 7:19, 21:15, 21:19, 150:18, 163:25, 199:11, 199:23, 200:4, 201:1, 201:29, 203:23, 205:1  
**fast** [4] - 21:18, 83:15, 89:17, 101:14  
**fast-track** [1] - 101:14  
**fast-tracked** [1] - 83:15  
**father** [1] - 125:14  
**fault** [1] - 113:10  
**FEBRUARY** [2] - 1:6, 1:10  
**February** [31] - 32:11, 177:26, 178:22, 178:27, 181:1, 182:9, 183:2, 186:6, 188:8, 190:3, 193:8, 194:11, 195:28, 197:3, 206:18, 206:26, 208:5, 208:6, 212:2, 212:17, 217:19, 218:21, 219:1, 224:29, 225:2, 225:7, 225:16, 225:22, 225:29, 226:29  
**feed** [1] - 218:16  
**feeds** [2] - 224:13, 226:20  
**feelings** [1] - 153:13  
**felt** [15] - 151:15, 156:1, 172:19, 184:4, 185:28, 186:5, 186:7, 195:7, 200:14, 203:16, 213:9, 213:14, 214:18, 214:21, 214:22  
**female** [4] - 71:28, 172:3, 172:6, 172:10  
**Fergus** [5] - 116:27, 144:10, 144:26, 145:8, 145:10  
**few** [14] - 26:3, 44:22, 100:27, 101:2, 107:29, 110:10, 148:3, 148:10, 155:1, 158:28, 162:2, 176:7, 209:19, 211:5  
**fide** [1] - 218:10  
**fides** [1] - 201:6  
**figure** [6] - 11:4, 11:15, 122:15, 122:26, 130:20  
**file** [31] - 7:19, 7:22, 8:17, 11:12, 13:1, 17:1, 17:23, 20:4, 21:15, 24:14, 54:24, 58:17, 59:8, 79:8, 134:16, 139:14, 181:24, 184:3, 193:22, 195:29, 204:5, 204:6, 204:8, 204:9, 204:14, 205:23, 206:2, 206:8, 206:10, 206:17, 214:17  
**filed** [1] - 11:13  
**files** [9] - 6:15, 6:16, 6:17, 6:18, 6:21, 6:25, 11:8, 30:16  
**filing** [2] - 9:2, 9:3  
**fill** [4] - 58:16, 94:10, 135:9, 135:17  
**filled** [4] - 13:4, 26:7, 58:15, 135:16  
**final** [2] - 61:14, 75:20  
**finally** [4] - 64:8, 100:2, 106:2, 213:22  
**Finan** [8] - 10:24, 10:26, 29:15, 29:17, 29:24, 32:2, 32:7, 40:27  
**FINAN** [4] - 4:9, 32:5, 40:25, 51:1  
**finances** [1] - 155:10  
**financial** [2] - 125:9, 162:11  
**financially** [1] - 162:16  
**findings** [1] - 8:15  
**fine** [4] - 93:12, 93:14, 113:8, 170:23  
**finish** [5] - 53:9, 57:1, 61:22, 145:21, 159:7  
**finished** [3] - 32:11, 140:4, 141:21  
**fire** [1] - 161:16  
**firearms** [1] - 67:19  
**firm** [1] - 158:5  
**firning** [1] - 160:29  
**first** [34] - 11:1, 22:11, 23:24, 31:15, 32:12, 33:27, 34:15, 35:2, 53:14, 57:5, 61:26, 63:18, 69:19, 72:16, 85:9, 98:3, 108:25, 116:12, 119:26, 127:5, 133:27, 137:21, 138:2, 157:11, 169:17, 172:29, 179:13, 180:11, 183:18, 196:24, 198:9, 211:22, 216:3, 219:28  
**firsthand** [1] - 169:2  
**firstly** [5] - 56:26, 111:28, 170:11, 193:3, 198:7  
**fit** [4] - 55:28, 56:13, 57:17, 59:16  
**FITZGERALD** [1] - 2:11  
**FITZWILLIAM** [2] - 2:30, 3:9  
**five** [7] - 10:13, 20:28, 53:4, 129:22, 159:1, 163:5, 208:7  
**fix** [1] - 161:14  
**flash** [2] - 41:24, 41:29  
**flashpoints** [1] - 42:4  
**flex** [1] - 161:7  
**folded** [1] - 221:9  
**folder** [2] - 11:13, 157:18  
**follow** [5] - 64:3, 68:9, 144:4, 146:8, 175:21  
**follow-on** [1] - 68:9  
**follow-up** [1] - 146:8  
**followed** [4] - 23:16, 32:12, 83:20, 113:12  
**FOLLOWING** [1] - 1:5  
**following** [21] - 1:26, 36:19, 46:9, 53:5, 69:25, 77:6, 77:8, 77:10, 81:7, 107:17, 108:28, 112:21, 118:11, 118:16, 141:21, 146:1, 150:15, 157:28, 158:4, 158:12, 194:21  
**following"** [1] - 112:28  
**follows** [1] - 70:15  
**FOLLOWS** [4] - 6:1, 116:1, 211:9, 214:12  
**foot** [5] - 104:2, 104:10, 106:16, 192:13, 204:19  
**footage** [1] - 39:7  
**footing** [1] - 111:17  
**FOR** [11] - 1:8, 2:6, 2:9, 2:15, 2:19, 2:23, 2:27, 3:3, 3:7, 3:11, 115:22  
**force** [4] - 118:7, 198:28, 218:11, 226:6  
**forced** [6] - 53:12, 56:17, 57:3, 61:24, 132:15, 185:3  
**forewarning** [1] - 42:7  
**forgive** [1] - 204:23  
**forgotten** [1] - 50:13  
**form** [28] - 13:4, 77:25, 82:7, 94:10, 94:11, 98:22, 134:10, 134:16, 135:9, 135:16, 135:17, 136:11, 140:28, 149:23, 179:5, 184:17, 186:22, 186:26, 187:7, 194:13, 197:24, 198:5, 198:26, 198:29, 203:13, 213:12  
**Form** [2] - 134:1, 134:5  
**formal** [5] - 7:13, 8:16, 31:20, 72:16, 179:2  
**formalise** [2] - 133:26, 134:12  
**formally** [2] - 80:19, 140:21  
**format** [2] - 108:3, 215:12  
**formed** [2] - 184:23, 204:27  
**forms** [2] - 26:19, 136:4  
**formulated** [1] - 67:5  
**forth** [1] - 6:19  
**forthcoming** [1] - 222:19  
**fortunately** [1] - 15:4  
**forward** [19] - 8:12, 14:5, 14:29, 15:12, 34:9, 34:14, 38:20, 47:16, 47:21, 47:26, 82:8, 92:26, 94:11, 94:17, 94:28, 108:2, 175:13, 175:23  
**forwarded** [28] - 13:18, 15:5, 17:5, 17:24, 22:25, 23:13, 27:3, 27:9, 33:24, 33:28, 35:11, 35:16, 39:26, 42:16, 42:17, 47:25, 49:10, 49:29, 71:3, 80:25, 83:7, 91:11, 94:5, 96:10, 98:16, 106:22, 107:18, 191:26  
**forwarding** [4] - 33:29, 34:2, 34:13, 92:6  
**forwards** [1] - 15:13  
**four** [8] - 10:13, 40:29, 44:11, 44:25, 167:11, 195:18, 197:13, 197:14  
**free** [1] - 158:22  
**frequent** [1] - 202:28  
**frequently** [2] -

65:20, 100:10  
**fresh** [1] - 141:25  
**Friday** [3] - 72:21, 123:2, 150:15  
**friend** [1] - 226:2  
**friendly** [1] - 226:3  
**front** [6] - 25:11, 34:1, 35:15, 141:6, 157:19, 186:3  
**frying** [1] - 161:23  
**fulfil** [1] - 154:2  
**full** [6] - 54:1, 54:24, 69:19, 97:20, 210:14, 210:19  
**full-blown** [1] - 210:14  
**fully** [1] - 45:8  
**function** [8] - 86:11, 88:16, 97:12, 97:15, 139:21, 147:19, 154:2, 168:22  
**functions** [2] - 6:10, 50:5  
**funded** [1] - 163:9  
**fundraising** [1] - 163:13  
**funds** [2] - 136:11, 136:12  
**funeral** [2] - 37:3, 37:4  
**furnished** [2] - 135:20, 213:16  
**fuss** [1] - 94:26  
**future** [9] - 41:19, 59:21, 88:20, 95:27, 96:18, 99:19, 99:20, 102:28, 153:28

## G

**GAGEBY** [1] - 2:23  
**Galway** [3] - 125:16, 137:20, 155:2  
**GALWAY** [1] - 2:21  
**Garda** [343] - 6:4, 6:5, 6:8, 6:20, 6:24, 7:17, 7:25, 12:28, 13:16, 13:21, 13:22, 13:26, 14:1, 14:10, 14:11, 14:13, 14:25, 16:16, 23:28, 24:6, 24:12, 24:21, 25:4, 30:18, 30:23, 30:26, 30:27, 31:3, 31:10, 32:9, 32:10, 33:10, 34:6, 34:24, 34:25, 34:26, 34:29, 35:2, 35:18, 35:28, 36:5, 36:12, 36:16, 36:24,

36:26, 36:27, 38:2, 39:5, 39:6, 41:9, 42:9, 42:10, 42:12, 42:21, 42:28, 43:8, 43:19, 45:23, 48:8, 48:11, 48:20, 48:23, 49:9, 49:14, 49:26, 50:2, 50:6, 50:7, 51:25, 52:6, 52:9, 52:23, 53:1, 53:22, 54:19, 54:22, 55:9, 55:21, 56:15, 56:25, 57:7, 57:12, 59:2, 60:25, 61:14, 61:29, 62:5, 63:7, 63:9, 63:17, 63:21, 63:28, 65:27, 69:18, 70:17, 71:27, 71:29, 72:4, 72:16, 73:10, 73:24, 78:29, 79:15, 80:5, 81:18, 81:25, 81:26, 82:5, 84:8, 84:9, 84:22, 88:12, 90:2, 90:11, 90:13, 90:16, 90:20, 90:21, 91:8, 91:22, 91:24, 91:26, 92:2, 92:5, 93:9, 93:17, 94:14, 94:24, 94:27, 95:14, 96:23, 97:23, 99:27, 100:12, 101:1, 102:2, 104:21, 106:5, 106:12, 106:21, 106:22, 106:27, 107:2, 107:5, 108:16, 111:26, 116:9, 116:10, 116:17, 116:29, 117:3, 117:4, 117:5, 117:14, 117:19, 118:5, 118:8, 118:15, 118:24, 118:26, 118:28, 119:12, 120:19, 120:21, 122:4, 122:5, 122:10, 123:11, 123:22, 123:24, 124:8, 124:11, 124:16, 124:24, 125:17, 125:22, 126:2, 126:13, 126:19, 127:9, 127:25, 128:16, 128:20, 128:25, 129:8, 129:14, 129:21, 130:5, 130:12, 131:4, 131:28, 132:7, 132:16, 132:17, 135:2, 135:21, 136:15, 136:20, 137:16, 137:20, 138:3, 138:4, 138:5,

138:9, 140:3, 140:9, 140:13, 140:22, 141:6, 141:15, 141:18, 141:29, 145:22, 145:29, 146:2, 146:4, 146:12, 146:15, 146:16, 146:17, 146:19, 147:6, 147:16, 148:14, 151:16, 154:9, 157:29, 158:14, 163:25, 164:25, 165:23, 166:18, 166:23, 166:25, 166:26, 167:4, 167:6, 167:8, 167:12, 167:16, 167:23, 168:7, 169:6, 171:10, 172:4, 172:11, 172:25, 173:21, 173:27, 174:5, 176:22, 176:29, 177:2, 177:3, 177:6, 177:16, 177:17, 177:22, 177:23, 177:28, 177:29, 178:9, 178:13, 179:28, 180:4, 180:10, 180:24, 181:8, 182:17, 183:21, 183:23, 184:1, 184:8, 184:20, 184:29, 185:7, 185:11, 185:22, 186:2, 186:6, 186:12, 186:19, 187:17, 188:9, 188:10, 188:12, 188:13, 188:26, 189:4, 189:11, 189:23, 189:28, 190:8, 190:16, 190:20, 190:24, 192:26, 194:22, 195:6, 195:9, 195:17, 195:20, 195:25, 196:1, 196:2, 196:17, 196:18, 197:1, 197:8, 197:16, 198:10, 198:16, 200:14, 201:8, 202:20, 203:10, 204:11, 204:16, 204:17, 204:18, 207:11, 208:22, 208:23, 211:22, 211:27, 212:16, 212:22, 213:4, 213:9, 215:9, 217:1, 219:12, 221:17, 223:1, 224:25, 225:24

**GARDA** [5] - 2:19, 4:4, 6:7, 30:22, 31:9  
**garda** [17] - 39:19, 65:6, 65:13, 91:23, 93:23, 93:24, 94:16, 109:18, 110:15, 111:27, 112:17, 172:3, 172:6, 172:10, 198:27, 199:7, 199:9  
**garda'** [1] - 94:7  
**Gardaí** [20] - 48:16, 59:25, 59:28, 66:11, 93:15, 93:18, 93:22, 100:3, 100:13, 122:13, 136:4, 151:11, 151:14, 204:27, 208:21, 217:23, 218:5, 221:4, 225:11, 226:7  
**gather** [2] - 17:27, 28:21  
**gathered** [3] - 30:7, 178:19, 218:25  
**general** [11] - 10:9, 10:12, 15:27, 19:13, 19:21, 54:4, 125:2, 131:4, 177:7, 184:20, 216:4  
**generally** [3] - 7:16, 16:2, 196:16  
**generate** [1] - 14:20  
**generated** [1] - 181:7  
**genuine** [8] - 112:29, 217:27, 218:4, 220:4, 224:14, 225:3, 225:24  
**genuinely** [2] - 222:14, 222:15  
**genuineness** [1] - 223:27  
**geography** [1] - 41:5  
**George** [2] - 105:26, 108:10  
**gig** [1] - 143:3  
**GIM** [11] - 134:1, 134:5, 134:10, 135:9, 135:16, 135:17, 136:3, 136:7, 136:11, 147:15, 147:16  
**given** [35] - 12:3, 26:15, 55:22, 69:23, 69:28, 70:28, 78:28, 86:4, 89:6, 96:13, 97:3, 102:27, 103:17, 103:19, 106:27, 134:4, 135:18, 135:24, 156:4, 157:25, 158:5, 166:7, 172:2, 172:8, 172:27, 172:29, 192:19, 192:20, 200:9,

200:26, 208:2, 215:6, 218:19, 224:21  
**glad** [1] - 227:9  
**Glencolmille** [1] - 116:15  
**Glienties** [5] - 33:2, 33:3, 35:24, 41:2, 165:12  
**God** [1] - 163:5  
**Goretti** [3] - 17:19, 19:23, 73:15  
**gravity** [1] - 95:8  
**great** [3] - 164:13, 173:3, 199:28  
**GROENEWALD** [5] - 4:14, 51:22, 56:22, 62:11, 63:15  
**Greenwald** [15] - 51:19, 51:24, 53:7, 53:10, 56:24, 57:2, 61:5, 61:13, 61:23, 63:16, 63:20, 64:8, 64:25, 64:27, 101:10  
**groom** [1] - 18:13  
**ground** [4] - 146:21, 169:1, 213:18, 225:10  
**grounds** [1] - 212:12  
**group** [1] - 195:24  
**GSOC** [100] - 6:16, 8:7, 8:10, 8:29, 10:4, 13:1, 13:5, 13:13, 14:24, 15:5, 15:6, 15:14, 17:20, 22:16, 22:18, 22:25, 38:4, 53:8, 53:12, 54:7, 54:24, 55:24, 56:4, 56:17, 57:4, 58:5, 59:4, 61:25, 65:8, 65:28, 66:10, 66:28, 67:7, 67:12, 68:12, 68:20, 69:16, 69:29, 73:20, 73:22, 74:22, 78:6, 79:18, 79:29, 80:1, 80:17, 81:29, 82:11, 83:10, 88:7, 88:11, 89:13, 89:24, 89:29, 90:2, 90:3, 90:7, 90:17, 90:18, 91:9, 91:12, 91:29, 92:15, 92:23, 92:25, 93:20, 93:23, 94:9, 94:21, 98:25, 99:2, 99:27, 100:4, 100:7, 100:14, 100:19, 101:5, 104:23, 105:10, 105:17, 106:7, 109:24, 110:26, 169:21, 169:24, 174:21, 174:26, 174:28,



180:4, 208:20,  
223:16, 223:21,  
224:1, 224:6, 224:12,  
224:13, 224:14  
**GSOC's** [1] - 68:17  
**guard** [22] - 11:23,  
11:24, 13:9, 13:11,  
18:12, 67:6, 68:12,  
72:29, 79:16, 87:13,  
94:25, 120:15,  
127:15, 129:2, 133:4,  
135:6, 135:28, 136:9,  
138:26, 156:15,  
166:12, 170:24  
**guard's** [2] - 12:18,  
124:2  
**guards** [20] - 22:23,  
41:20, 66:17, 66:26,  
68:29, 70:10, 78:11,  
82:27, 92:10, 120:4,  
128:6, 151:19, 154:8,  
161:17, 161:19,  
164:4, 173:25, 174:14  
**guess** [1] - 79:7  
**guessing** [1] - 18:26  
**guidance** [1] -  
192:18  
**guidelines** [1] -  
135:21  
**guilty** [1] - 220:8  
**Gweedore** [1] -  
167:13  
**GWEN** [1] - 1:30  
**Gwen** [1] - 1:25

## H

**habit** [1] - 75:11  
**half** [5] - 130:2,  
130:7, 130:8, 139:9,  
157:22  
**halfway** [1] - 106:11  
**HALLS** [1] - 2:21  
**halt** [1] - 225:10  
**HANAHOE** [1] - 2:24  
**hand** [11] - 11:3,  
43:28, 83:24, 95:11,  
128:24, 157:29,  
181:28, 182:6,  
202:25, 203:2, 203:16  
**hand-deliver** [2] -  
182:6, 203:16  
**handed** [7] - 52:23,  
52:25, 82:6, 178:28,  
181:25, 182:10,  
205:21  
**handing** [2] - 158:15,  
206:7  
**handle** [1] - 134:5

**handled** [1] - 133:27  
**handling** [1] - 200:20  
**handwriting** [1] -  
126:26  
**handwritten** [3] -  
71:21, 108:1, 121:1  
**hanging** [2] - 142:25,  
159:5  
**happiness** [1] -  
226:13  
**happy** [1] - 140:9  
**harassed** [2] -  
178:10, 187:19  
**harassing** [1] -  
200:15  
**harassment** [7] -  
72:12, 73:14, 184:17,  
188:3, 188:21,  
201:28, 214:20  
**hard** [4] - 19:8,  
47:19, 68:4, 142:10  
**harden** [4] - 133:1,  
135:27, 138:14,  
162:12  
**harm** [65] - 11:24,  
11:26, 45:3, 45:4,  
45:8, 45:9, 55:28,  
56:7, 56:14, 57:18,  
59:7, 59:11, 59:20,  
65:25, 66:5, 66:7,  
66:14, 67:14, 73:29,  
75:24, 75:29, 76:2,  
78:3, 84:3, 84:7, 85:1,  
85:4, 85:8, 85:13,  
85:17, 85:19, 86:4,  
86:7, 86:13, 86:15,  
86:21, 86:25, 86:27,  
87:8, 87:11, 87:15,  
87:18, 87:23, 87:25,  
87:28, 88:25, 95:15,  
95:23, 95:26, 96:14,  
97:8, 98:29, 99:10,  
99:11, 99:12, 99:14,  
99:17, 99:18, 101:25,  
109:15, 112:17,  
114:24  
**Harrison** [219] - 6:20,  
6:24, 7:18, 7:25,  
16:16, 19:26, 20:5,  
21:29, 23:28, 24:6,  
24:21, 25:4, 30:26,  
31:3, 34:5, 34:24,  
34:25, 34:27, 34:29,  
35:2, 35:18, 36:5,  
36:25, 36:26, 36:28,  
38:2, 39:6, 41:9,  
41:24, 42:11, 42:13,  
42:21, 42:28, 43:8,  
45:23, 48:8, 48:11,  
48:23, 49:9, 49:14,

49:26, 50:2, 50:7,  
52:7, 52:9, 52:23,  
52:29, 53:1, 53:22,  
55:21, 56:15, 56:25,  
57:12, 59:2, 61:15,  
62:5, 63:7, 63:21,  
63:28, 72:5, 72:20,  
81:18, 95:25, 112:27,  
117:3, 117:14, 118:5,  
118:15, 118:25,  
118:26, 118:28,  
119:12, 120:20,  
120:21, 122:4, 122:5,  
122:10, 123:11,  
123:22, 124:8,  
124:16, 124:24,  
125:17, 126:2,  
126:14, 126:19,  
126:29, 127:9,  
127:25, 128:16,  
128:20, 128:26,  
129:8, 129:14,  
129:21, 130:5,  
130:12, 131:4,  
131:28, 132:7,  
132:17, 135:2,  
135:21, 136:20,  
137:16, 137:20,  
138:3, 138:4, 138:9,  
139:1, 140:3, 140:9,  
141:6, 141:16,  
141:18, 141:29,  
145:22, 145:29,  
146:4, 146:13,  
146:15, 146:16,  
146:18, 146:20,  
147:6, 147:16,  
151:16, 154:9, 158:6,  
159:24, 163:25,  
165:23, 166:25,  
167:4, 167:16,  
167:23, 168:8, 169:7,  
171:11, 171:24,  
172:25, 174:5,  
177:29, 178:9,  
178:13, 179:28,  
180:10, 181:17,  
182:17, 182:20,  
183:10, 183:21,  
183:23, 184:2, 184:8,  
185:23, 186:2, 186:6,  
186:12, 186:13,  
186:20, 187:17,  
188:9, 188:10,  
188:12, 189:4,  
189:11, 189:23,  
189:28, 190:8,  
190:20, 192:26,  
193:22, 194:22,  
195:6, 195:9, 195:17,  
195:20, 195:26,

196:1, 196:3, 197:2,  
197:9, 198:11,  
198:16, 202:20,  
204:11, 204:15,  
204:16, 204:17,  
204:19, 207:11,  
208:22, 208:23,  
211:22, 211:27,  
212:16, 212:22,  
213:9, 217:18,  
217:20, 217:24,  
217:28, 218:28,  
219:9, 219:12,  
219:19, 220:7,  
220:14, 221:9, 222:6,  
222:21, 223:8,  
223:22, 223:26,  
225:23, 226:12,  
226:15  
**HARRISON** [1] - 2:19  
**Harrison's** [21] -  
24:12, 35:28, 42:9,  
48:20, 55:10, 117:5,  
117:19, 118:9, 138:6,  
140:22, 148:14,  
167:6, 167:8, 181:8,  
185:7, 190:16,  
190:24, 196:19,  
201:8, 201:9, 215:9  
**HARTNETT** [1] - 3:3  
**Harty** [10] - 6:4, 93:8,  
117:11, 196:28,  
199:4, 199:17,  
200:22, 201:3,  
201:22, 216:12  
**HARTY** [47] - 2:19,  
4:5, 4:11, 4:22, 4:29,  
5:3, 5:8, 6:7, 6:8,  
30:18, 40:26, 40:27,  
67:25, 81:16, 81:17,  
94:3, 100:23, 118:18,  
133:18, 133:19,  
144:12, 144:15,  
144:24, 148:1, 170:9,  
170:11, 170:29,  
175:24, 193:2, 193:3,  
196:25, 196:29,  
199:6, 199:16, 200:8,  
200:25, 201:5,  
201:13, 201:19,  
202:1, 203:10,  
203:22, 203:24,  
205:2, 210:4, 210:29,  
216:4  
**Harty's** [2] - 199:26,  
212:14  
**HAVING** [6] - 32:5,  
51:22, 65:3, 116:6,  
164:21, 176:26  
**head** [3] - 110:10,

155:2, 218:26  
**headed** [2] - 118:24,  
126:27  
**heading** [6] - 26:6,  
77:29, 111:7, 125:9,  
132:3, 205:6  
**headlines** [1] -  
194:26  
**Headquarters** [3] -  
86:14, 86:18, 136:15  
**headquarters** [2] -  
202:27, 223:25  
**hear** [7] - 64:22,  
142:16, 149:1, 158:1,  
196:24, 196:27,  
227:10  
**heard** [17] - 7:25,  
42:6, 62:20, 69:28,  
77:11, 119:3, 155:23,  
156:5, 162:20,  
172:21, 175:21,  
203:23, 216:6,  
216:13, 226:23,  
226:24, 226:26  
**HEARING** [3] - 6:1,  
115:22, 116:1  
**hearing** [1] - 64:2  
**hearings** [1] - 33:23  
**heavy** [1] - 162:12  
**HEGARTY** [1] - 2:29  
**HELD** [1] - 1:17  
**help** [5] - 115:14,  
125:21, 151:13,  
162:19, 217:14  
**helped** [1] - 99:3  
**helpful** [1] - 97:10  
**hen** [1] - 221:16  
**hence** [1] - 198:4  
**herself** [2] - 121:14,  
206:11  
**Hi** [1] - 156:21  
**High** [12] - 189:5,  
189:12, 189:25,  
190:1, 190:8, 190:10,  
190:22, 191:1, 191:8,  
196:25, 212:7, 212:19  
**high** [3] - 95:7,  
138:16, 146:13  
**high-level** [1] -  
146:13  
**higher** [1] - 226:5  
**highest** [1] - 226:18  
**highlight** [1] - 197:4  
**highlighted** [8] -  
10:3, 48:13, 56:27,  
78:11, 89:10, 100:1,  
175:17, 197:1  
**highlighter** [1] - 9:22  
**highlighting** [2] -  
9:22, 16:1

**highly** [2] - 69:14, 90:22  
**himself** [1] - 203:17  
**hinder** [1] - 184:20  
**hindsight** [6] - 20:20, 21:9, 60:23, 192:14, 192:17, 214:23  
**history** [1] - 116:8  
**hit** [1] - 194:25  
**hmm** [7] - 21:22, 25:16, 96:16, 104:12, 176:14, 200:8, 209:11  
**hold** [4] - 16:11, 16:21, 194:20, 195:7  
**holiday** [1] - 97:28  
**home** [15] - 85:27, 117:5, 117:19, 118:9, 118:26, 122:4, 125:11, 129:15, 154:28, 166:1, 201:9, 213:8, 225:22, 225:29  
**home"** [1] - 131:20  
**honest** [4] - 10:23, 10:28, 19:5, 28:1  
**honestly** [2] - 68:6, 131:16  
**hope** [1] - 147:7  
**hospital** [1] - 223:14  
**Hotel** [3] - 125:26, 166:8, 166:14  
**hotel** [12] - 17:11, 18:12, 39:7, 166:20, 167:13, 168:21, 172:2, 172:27, 173:6, 174:6, 174:9, 174:10  
**hour** [5] - 115:20, 132:9, 145:21, 157:2, 157:22  
**hours** [7] - 23:11, 71:18, 74:6, 82:20, 143:21, 144:13, 157:8  
**HOUSE** [1] - 2:13  
**house** [34] - 35:29, 41:26, 42:9, 83:4, 83:5, 117:23, 119:13, 120:4, 127:5, 131:3, 132:28, 133:1, 133:8, 134:23, 134:26, 136:10, 137:23, 140:4, 148:14, 149:13, 151:15, 153:2, 154:1, 155:5, 157:11, 161:21, 162:10, 163:7, 167:8, 169:7, 219:19, 219:29, 221:5, 222:5  
**houses** [1] - 134:23  
**HQ** [2] - 133:23, 133:28  
**HSE** [26] - 22:9,

26:10, 38:22, 38:26, 43:17, 125:14, 127:26, 128:2, 140:17, 151:19, 152:23, 152:24, 152:27, 163:9, 163:11, 174:17, 175:5, 182:18, 182:19, 182:22, 182:26, 218:22, 223:10, 223:17  
**HSE"** [1] - 152:21  
**HSE-type** [1] - 163:9  
**huge** [1] - 187:25  
**HUGH** [1] - 3:3  
**human** [1] - 201:21  
**husband** [3] - 204:25, 205:1, 217:22

I

**i.e** [1] - 103:12  
**IA31** [2] - 179:5, 194:13  
**IA32** [3] - 197:25, 198:5, 213:12  
**identification** [1] - 83:4  
**identified** [4] - 171:11, 179:9, 187:16  
**identifies** [1] - 185:8  
**identify** [4] - 168:2, 204:18, 204:20, 208:3  
**imagine** [2] - 50:1, 201:21  
**immediately** [12] - 14:3, 74:6, 82:14, 82:17, 83:3, 84:10, 85:4, 106:22, 149:12, 210:1, 210:9, 210:13  
**impairment** [1] - 86:10  
**impersonal** [1] - 212:29  
**import** [2] - 7:28, 95:3  
**importance** [4] - 19:12, 46:28, 46:29, 193:28  
**important** [11] - 75:12, 87:5, 93:8, 96:26, 97:3, 131:2, 194:1, 204:22, 215:28, 225:20, 226:1  
**impressing** [1] - 122:25  
**impression** [9] - 29:28, 30:2, 30:25, 153:3, 153:29,

155:13, 156:28, 157:25, 158:5  
**improper** [2] - 94:16, 225:11  
**IN** [1] - 1:17  
**in-depth** [1] - 49:21  
**inadmissible** [2] - 110:27, 113:5  
**inappropriate** [1] - 184:11  
**incident** [31] - 8:1, 18:26, 29:20, 29:26, 34:19, 34:21, 34:22, 39:10, 47:9, 54:7, 59:1, 59:10, 65:21, 65:23, 69:21, 95:23, 168:21, 174:6, 174:9, 174:10, 180:16, 208:9, 208:11, 208:13, 208:14, 209:12, 217:22, 219:27, 221:25, 221:26  
**incidents** [8] - 9:20, 28:26, 162:2, 205:11, 208:6, 209:1, 209:3, 209:24  
**inclined** [2] - 121:16, 121:26  
**include** [3] - 46:9, 96:28, 96:29  
**included** [5] - 6:21, 6:24, 19:1, 27:8, 174:15  
**includes** [2] - 6:18, 91:16  
**inclusion** [1] - 87:3  
**income** [1] - 139:24  
**incorrect** [7] - 59:13, 106:15, 112:10, 159:26, 160:6, 195:27, 202:22  
**incorrectly** [1] - 111:12  
**increased** [1] - 42:9  
**incumbent** [2] - 85:7, 89:5  
**indeed** [5] - 68:25, 94:2, 105:11, 106:17, 211:17  
**indents** [1] - 41:20  
**independent** [2] - 95:18, 109:29  
**INDEX** [1] - 4:1  
**indicate** [3] - 117:10, 124:10, 159:24  
**indicated** [3] - 18:18, 125:6, 199:6  
**indicating** [4] - 23:28, 130:12,

149:18, 196:18  
**indictable** [1] - 209:1  
**indifferent** [1] - 102:26  
**individual** [9] - 90:14, 156:1, 160:3, 160:23, 161:9, 179:11, 200:15, 205:16, 207:21  
**indoor** [3] - 48:24, 220:16, 223:23  
**ineffective** [1] - 104:25  
**info** [1] - 143:16  
**inform** [4] - 34:15, 165:25, 165:27, 191:15  
**information** [60] - 8:11, 18:2, 20:28, 24:1, 26:16, 29:16, 34:10, 34:17, 43:4, 43:11, 43:15, 53:24, 53:28, 54:19, 54:21, 54:22, 58:20, 58:23, 59:8, 59:26, 59:28, 60:24, 63:7, 63:27, 79:26, 82:28, 89:23, 92:15, 93:26, 95:8, 126:21, 131:8, 131:24, 135:14, 136:28, 138:20, 139:23, 149:19, 150:23, 150:26, 151:7, 151:27, 151:28, 152:3, 154:12, 154:15, 154:18, 154:20, 157:12, 157:26, 167:20, 182:4, 187:25, 204:4, 210:16, 212:15, 212:18  
**informed** [17] - 11:10, 26:19, 36:18, 43:1, 80:9, 117:2, 119:18, 119:20, 165:22, 166:11, 166:27, 167:1, 173:5, 173:7, 183:25, 189:14, 197:9  
**informing** [2] - 167:3, 179:1  
**infrastructure** [3] - 138:13, 140:5, 162:8  
**ingredients** [3] - 102:20, 102:29, 103:5  
**initial** [1] - 171:19  
**initiate** [1] - 158:8  
**initiated** [2] - 197:20, 197:22

**initiating** [1] - 211:29  
**injured** [1] - 104:13  
**injuries** [1] - 85:10  
**injury** [6] - 54:11, 59:7, 59:21, 59:24, 86:8, 86:24  
**innocent** [1] - 122:8  
**inordinate** [2] - 191:10, 212:13  
**input** [3] - 8:9, 10:7, 10:20  
**inquire** [1] - 21:17  
**inquiries** [17] - 17:11, 18:7, 21:16, 21:19, 21:27, 29:22, 39:9, 39:13, 39:15, 43:5, 182:23, 186:16, 199:29, 210:15, 215:22, 219:2, 221:18  
**inquiring** [4] - 52:27, 118:3, 142:21, 183:23  
**inquiry** [2] - 17:22, 186:14  
**INQUIRY** [2] - 1:3, 1:9  
**insobar** [4] - 21:9, 43:24, 139:18, 145:28  
**INSP** [2] - 2:27, 2:28  
**inspection** [2] - 50:17, 134:20  
**inspections** [1] - 46:26  
**INSPECTOR** [3] - 5:1, 164:21, 170:8  
**inspector** [17] - 32:22, 32:24, 32:26, 32:27, 32:29, 37:19, 38:1, 97:29, 138:17, 165:11, 165:15, 165:17, 165:18, 168:15, 172:15, 177:15, 177:18  
**Inspector** [55] - 9:10, 10:19, 10:20, 16:27, 17:9, 18:2, 20:12, 21:3, 28:19, 29:22, 29:28, 30:3, 37:19, 37:25, 39:18, 39:21, 39:23, 39:26, 39:29, 47:25, 62:16, 62:28, 63:5, 63:22, 64:5, 73:15, 141:26, 141:28, 142:18, 142:22, 142:27, 143:10, 143:13, 143:25, 145:10, 145:22, 145:24, 148:11, 156:10, 156:13, 164:18, 164:23, 168:28,

170:11, 170:17,  
175:24, 176:2,  
176:17, 188:21,  
221:24, 222:12,  
222:27, 222:29,  
224:18, 224:24  
**inspectors** [2] -  
19:22, 171:2  
**install** [2] - 136:1,  
136:14  
**installation** [1] -  
133:2  
**instance** [6] - 8:19,  
93:11, 98:9, 110:15,  
113:26, 213:6  
**instances** [1] - 99:12  
**instead** [1] - 112:9  
**instigate** [1] - 150:28  
**INSTRUCTED** [7] -  
2:12, 2:16, 2:20, 2:24,  
2:29, 3:4, 3:8  
**instructed** [2] -  
39:20, 225:1  
**instructions** [4] -  
61:7, 158:27, 159:4,  
167:3  
**INSTRUMENT** [1] -  
1:8  
**insurance** [5] - 7:20,  
35:1, 48:12, 50:3,  
220:9  
**intelligence** [3] -  
135:15, 167:26,  
168:21  
**intend** [1] - 33:21  
**intending** [1] - 173:4  
**intent** [1] - 31:3  
**intention** [1] - 109:4  
**inter** [1] - 80:28  
**interacted** [1] - 93:10  
**interchangeably** [1]  
- 79:7  
**interest** [7] - 19:28,  
69:20, 93:6, 95:7,  
111:13, 174:27,  
221:11  
**interested** [4] - 24:5,  
25:27, 69:22, 227:7  
**interim** [2] - 186:14,  
226:25  
**internal** [2] - 6:15,  
66:19  
**Internal** [8] - 15:12,  
27:10, 49:25, 106:24,  
189:27, 191:27,  
192:18, 207:6  
**internally** [2] - 94:1,  
94:26  
**interpretation** [3] -  
110:9, 124:22, 221:10

**interrupt** [1] - 199:18  
**interval** [1] - 114:6  
**interview** [7] - 52:24,  
53:22, 57:13, 62:12,  
63:8, 63:12, 150:4  
**interviewed** [4] -  
22:29, 23:5, 53:8,  
168:3  
**INTO** [1] - 1:3  
**introduced** [1] -  
226:2  
**invariably** [1] -  
212:29  
**inverted** [2] - 129:5,  
131:13  
**investigate** [25] -  
16:28, 17:26, 28:26,  
29:5, 29:7, 34:28,  
52:6, 58:26, 64:18,  
64:21, 88:15, 93:19,  
98:25, 178:3, 178:7,  
179:24, 186:21,  
192:25, 210:6, 210:9,  
210:27, 213:11,  
213:13, 221:24, 225:1  
**investigated** [9] -  
16:12, 16:18, 18:6,  
62:2, 84:17, 201:10,  
209:29, 210:13, 213:1  
**investigating** [11] -  
30:3, 52:15, 55:9,  
58:4, 58:7, 65:11,  
167:24, 177:27,  
186:20, 187:17,  
193:26  
**investigation** [103] -  
8:8, 8:10, 8:17, 11:11,  
16:29, 20:3, 20:26,  
21:16, 21:20, 21:28,  
22:3, 37:29, 39:19,  
46:16, 52:12, 54:9,  
54:12, 54:13, 54:16,  
54:18, 54:20, 55:11,  
60:1, 60:5, 60:10,  
60:25, 60:27, 64:11,  
64:14, 64:17, 64:23,  
69:4, 82:14, 82:16,  
93:3, 93:28, 95:18,  
100:4, 102:24, 103:2,  
103:8, 103:9, 103:10,  
103:11, 103:14,  
103:23, 109:29,  
111:18, 140:29,  
150:28, 158:9,  
158:15, 167:15,  
167:17, 167:25,  
167:28, 178:5,  
178:26, 183:13,  
183:17, 183:19,  
184:6, 185:2, 185:14,

185:16, 185:24,  
185:26, 186:9,  
186:25, 187:24,  
188:20, 188:25,  
189:9, 190:21, 191:4,  
191:9, 191:28,  
192:16, 194:21,  
194:27, 195:7,  
195:29, 197:21,  
198:7, 200:5, 201:7,  
201:24, 202:8,  
207:22, 207:29,  
208:1, 208:2, 210:15,  
210:19, 211:11,  
211:13, 212:1, 212:7,  
212:28, 223:18  
**investigations** [9] -  
22:24, 42:12, 46:13,  
51:28, 52:3, 65:8,  
182:23, 191:13,  
207:20  
**investigative** [4] -  
83:19, 101:17, 187:6,  
198:20  
**investigator** [1] -  
53:8  
**invited** [1] - 72:8  
**inviting** [1] - 60:16  
**invoking** [1] - 98:29  
**involve** [2] - 103:11,  
103:12  
**involved** [17] - 17:4,  
17:6, 17:9, 20:2,  
38:25, 46:16, 50:8,  
55:9, 55:24, 69:17,  
97:24, 160:12, 161:7,  
174:25, 182:19,  
183:20, 205:13  
**involvement** [5] -  
38:27, 39:3, 163:12,  
174:26, 220:3  
**involving** [1] - 69:18  
**Ireland** [1] - 167:24  
**IRELAND** [1] - 3:6  
**irrelevant** [4] -  
154:17, 204:6, 204:9,  
226:16  
**irrespective** [1] -  
80:4  
**isolated** [1] - 134:22  
**issue** [37] - 38:28,  
56:6, 56:27, 62:27,  
76:10, 80:7, 80:8,  
90:3, 126:6, 148:28,  
171:27, 193:19,  
199:15, 199:24,  
200:5, 201:1, 203:27,  
203:28, 207:13,  
207:15, 217:25,  
218:3, 218:9, 218:23,

219:8, 219:13,  
219:20, 220:11,  
222:14, 222:22,  
223:4, 223:15,  
223:28, 224:7,  
224:18, 224:22,  
225:25  
**issued** [1] - 126:3  
**issues** [7] - 46:20,  
50:4, 72:6, 109:14,  
154:4, 184:3, 204:13  
**it'** [1] - 145:13  
**items** [1] - 117:26  
**itself** [9] - 15:13,  
37:8, 40:16, 57:22,  
69:8, 75:27, 87:18,  
108:20, 194:19

---

**J**

---

**January** [8] - 116:11,  
164:27, 183:1, 183:2,  
189:18, 205:22,  
217:18, 224:17  
**Jim** [6] - 123:15,  
125:18, 131:26,  
133:12, 219:27, 220:2  
**job** [9] - 138:11,  
138:12, 140:26,  
145:16, 165:7,  
175:17, 175:19,  
175:20, 213:3  
**jobs** [4] - 175:10,  
175:12, 175:14,  
175:16  
**JOHAN** [3] - 4:14,  
51:22, 56:22  
**Johan** [2] - 51:19,  
53:7  
**JOHN** [1] - 2:11  
**join** [1] - 9:8  
**joined** [4] - 21:1,  
32:10, 116:10, 177:2  
**joke** [1] - 155:21  
**JOSEPH** [1] - 3:3  
**jotted** [1] - 128:15  
**journal** [18] - 45:24,  
46:1, 47:2, 47:4,  
170:12, 170:21,  
170:22, 171:5, 171:7,  
171:8, 173:12, 193:4,  
193:10, 193:12,  
194:4, 206:19, 206:22  
**journals** [2] - 50:17,  
171:1  
**JUDGE** [2] - 1:12,  
2:3  
**Judge** [10] - 51:27,  
52:1, 52:4, 52:8,

52:13, 60:22, 62:13,  
63:11, 193:18, 211:4  
**judgement** [4] -  
86:16, 87:10, 102:6,  
103:15  
**judicial** [5] - 199:26,  
212:8, 213:17,  
213:19, 213:27  
**July** [13] - 52:9, 53:7,  
54:14, 54:28, 55:1,  
55:2, 55:5, 55:14,  
55:18, 191:22,  
191:25, 220:24  
**juncture** [2] - 60:9,  
117:10  
**June** [6] - 177:20,  
192:5, 208:10,  
208:14, 219:18,  
220:22  
**junior** [2] - 219:21,  
219:22  
**JUSTICE** [3] - 1:8,  
1:12, 2:2  
**Justice** [1] - 80:23

---

**K**

---

**KARL** [2] - 4:4, 6:7  
**KATHLEEN** [1] - 2:7  
**KATHY** [1] - 2:12  
**Kavanagh** [3] -  
17:16, 23:23, 58:10  
**KAVANAGH** [1] - 2:4  
**keep** [8] - 15:24,  
19:7, 19:11, 53:29,  
94:1, 134:9, 158:25,  
217:8  
**Keith** [47] - 16:16,  
19:26, 20:5, 21:29,  
24:6, 34:5, 35:18,  
41:24, 52:7, 52:9,  
72:4, 72:20, 112:27,  
117:3, 118:25,  
126:29, 138:29,  
156:14, 158:6,  
159:24, 171:10,  
171:24, 172:25,  
177:29, 181:17,  
183:21, 185:1,  
187:17, 217:18,  
217:20, 217:24,  
217:27, 218:28,  
219:9, 219:12,  
219:19, 220:7,  
220:14, 221:8, 222:5,  
222:21, 223:7,  
223:22, 223:26,  
225:23, 226:12,  
226:15  
**Kelly** [1] - 156:21

**Keogh** [2] - 71:23, 113:26  
**kept** [7] - 24:14, 24:15, 48:8, 49:26, 193:4, 197:8, 198:11  
**kettle** [1] - 161:8  
**Kevin** [3] - 32:23, 32:24, 81:5  
**key** [2] - 9:14, 46:20  
**KH** [3] - 72:7, 73:11, 73:25  
**kids** [2] - 153:10, 153:27  
**KILFEATHER** [1] - 2:20  
**kill** [7] - 71:27, 72:8, 99:19, 209:28, 210:6, 210:12, 214:15  
**Kill** [1] - 118:24  
**kill/harm** [2] - 178:11, 187:19  
**killed** [1] - 72:29  
**killed"** [1] - 72:28  
**kind** [8] - 63:9, 63:10, 128:18, 129:5, 155:21, 161:10, 163:9, 163:14  
**kitchen** [5] - 129:29, 154:6, 157:16, 157:17, 161:22  
**knives** [1] - 161:23  
**knowing** [1] - 60:1  
**knowledge** [20] - 25:13, 45:12, 49:21, 59:5, 60:7, 64:12, 87:16, 121:5, 133:5, 136:29, 149:19, 152:25, 154:18, 160:22, 162:5, 164:7, 169:2, 169:22, 207:14, 207:15  
**known** [8] - 36:28, 65:8, 106:17, 113:28, 139:7, 140:12, 157:24, 158:12  
**knows** [3] - 60:14, 145:23, 203:19

## L

**labelled** [1] - 179:9  
**lads** [1] - 143:20  
**lady** [2] - 122:6, 162:9  
**land** [1] - 213:8  
**landing** [1] - 30:16  
**landline** [2] - 172:11, 187:11  
**language** [1] -

102:17  
**large** [3] - 37:3, 81:10, 199:22  
**last** [13] - 18:18, 39:28, 44:2, 47:29, 50:14, 74:4, 99:6, 115:8, 129:13, 139:9, 209:19, 210:7, 215:20  
**late** [1] - 166:1  
**lately** [1] - 46:5  
**laugh** [1] - 155:20  
**launch** [5] - 69:4, 93:3, 93:27, 95:10, 210:14  
**launched** [2] - 111:18, 213:27  
**launching** [1] - 111:12  
**law** [4] - 49:21, 94:28, 169:23, 170:23  
**laws** [1] - 162:6  
**lay** [1] - 189:21  
**lead** [1] - 151:12  
**LEADER** [28] - 2:7, 4:10, 4:12, 5:2, 5:4, 6:4, 31:7, 32:1, 32:6, 32:7, 40:22, 51:2, 51:3, 51:14, 164:17, 164:22, 164:23, 170:5, 175:29, 176:1, 176:15, 176:21, 176:27, 176:28, 186:29, 189:17, 192:28, 214:7  
**leading** [1] - 55:8  
**learn** [2] - 158:1, 217:23  
**learned** [3] - 138:2, 167:10, 199:19  
**lease** [1] - 131:3  
**least** [5] - 101:6, 111:1, 215:8, 221:4, 227:3  
**leave** [19] - 22:4, 39:16, 50:9, 72:20, 74:23, 93:14, 93:16, 112:28, 142:25, 183:27, 183:29, 196:4, 196:5, 197:2, 197:10, 198:16, 219:29  
**leaving** [4] - 50:2, 129:14, 185:21, 205:5  
**led** [2] - 20:26, 21:10  
**left** [10] - 48:4, 129:13, 132:1, 144:17, 144:19, 153:9, 157:3, 174:28, 175:13, 222:5  
**legal** [1] - 6:16

**legality** [1] - 67:4  
**legislation** [3] - 69:15, 90:22, 161:14  
**legitimacy** [1] - 69:2  
**Leitrim** [6] - 177:4, 177:13, 209:27, 210:5, 210:8, 210:11  
**length** [2] - 61:17, 217:8  
**Leonard** [1] - 108:29  
**less** [3] - 12:21, 114:8, 140:3  
**lessened** [1] - 19:2  
**lest** [1] - 102:27  
**letter** [37] - 13:7, 17:7, 33:28, 179:1, 180:29, 181:1, 185:10, 186:1, 186:17, 186:19, 186:23, 187:1, 187:2, 187:3, 187:5, 188:17, 189:6, 189:10, 189:15, 189:18, 189:22, 190:19, 191:26, 192:1, 192:4, 198:10, 198:19, 198:21, 205:22, 205:26, 205:29, 212:26, 214:4, 218:21, 218:25, 225:7, 227:1  
**Letterkenny** [56] - 6:14, 8:22, 32:16, 32:20, 32:25, 32:29, 33:6, 33:7, 33:25, 34:4, 34:20, 34:21, 35:11, 36:12, 36:16, 36:18, 37:14, 40:19, 40:20, 44:3, 48:2, 48:3, 48:10, 48:26, 49:2, 50:8, 72:22, 116:17, 116:21, 119:21, 123:24, 124:11, 127:11, 132:2, 132:16, 135:2, 136:26, 143:5, 143:8, 146:2, 150:10, 157:29, 158:13, 162:22, 165:1, 165:5, 165:6, 165:14, 168:7, 172:4, 172:11, 218:8, 222:4, 222:26, 223:14  
**letters** [3] - 15:15, 152:21, 226:25  
**level** [6] - 86:27, 96:25, 99:12, 134:27, 146:13, 202:2  
**lieu** [1] - 49:27  
**life** [10] - 73:23, 88:11, 91:25, 99:26,

117:3, 140:25, 147:27, 153:8, 154:5, 155:23  
**Lifford** [2] - 32:14, 32:15  
**light** [1] - 94:14  
**lighting** [2] - 117:25, 134:25  
**likelihood** [1] - 121:20  
**likely** [4] - 104:3, 104:14, 150:19, 150:28  
**limited** [2] - 41:12, 216:7  
**limits** [1] - 91:19  
**line** [5] - 127:8, 195:4, 201:28, 205:7, 206:4  
**lines** [3] - 12:20, 53:4  
**link** [2] - 87:6, 87:10  
**list** [2] - 110:29, 175:11  
**listed** [1] - 209:15  
**lists** [1] - 46:11  
**literally** [4] - 143:7, 143:8, 162:28, 225:10  
**LITTLE** [1] - 2:13  
**live** [3] - 209:7, 209:25, 209:28  
**living** [4] - 132:27, 154:26, 182:21, 183:10  
**local** [1] - 184:8  
**locals** [1] - 48:15  
**location** [3] - 117:26, 135:29, 163:7  
**log** [8] - 76:27, 77:8, 85:7, 89:5, 96:8, 102:27, 103:16, 105:11  
**logbook** [2] - 85:22, 85:28  
**logged** [3] - 77:24, 78:27, 103:19  
**logical** [1] - 45:6  
**look** [23] - 28:25, 29:26, 68:7, 68:18, 68:22, 71:20, 76:27, 81:3, 92:12, 110:24, 110:25, 112:9, 112:11, 112:26, 114:26, 117:23, 129:10, 132:28, 133:6, 138:12, 198:6, 211:27, 216:1  
**looked** [3] - 39:25, 208:15, 220:11  
**looking** [16] - 8:11, 18:25, 28:20, 60:10,

60:23, 77:26, 107:15, 142:15, 153:26, 156:15, 169:19, 174:22, 191:27, 205:26, 208:8, 209:13  
**looks** [4] - 68:13, 85:16, 96:5, 131:11  
**looseness** [2] - 18:16, 102:17  
**loss** [1] - 86:9  
**lost** [2] - 83:16, 94:23  
**low** [4] - 87:5, 87:12, 87:23, 138:15  
**LUNCH** [2] - 115:22, 116:1

## M

**M.E** [1] - 2:24  
**MADE** [2] - 1:3, 1:8  
**main** [1] - 38:13  
**maintain** [2] - 19:13, 19:14  
**maintained** [2] - 48:19, 226:8  
**major** [1] - 30:26  
**male** [1] - 162:9  
**malice** [2] - 218:26, 219:16  
**malicious** [4] - 104:24, 185:16, 201:17, 201:24  
**maliciously** [2] - 201:26, 218:5  
**maliciousness** [1] - 202:2  
**Malone** [1] - 1:25  
**MALONE** [1] - 1:30  
**man** [2] - 41:13, 169:1  
**manage** [1] - 6:15  
**managed** [2] - 17:1, 207:10  
**management** [10] - 13:8, 13:12, 30:27, 57:8, 61:29, 78:26, 80:5, 80:26, 175:11, 207:19  
**mandatory** [2] - 94:18, 95:12  
**manner** [8] - 11:19, 53:13, 57:4, 61:25, 62:2, 203:4, 203:8, 203:9  
**Manorhamilton** [1] - 177:3  
**manorhamilton** [1] - 220:8

**manslaughter** [1] - 160:4  
**March** [7] - 24:22, 183:21, 184:25, 189:22, 206:1, 212:17, 217:21  
**MARISA** [1] - 3:3  
**Marisa** [90] - 9:10, 17:20, 18:22, 18:28, 19:29, 20:6, 21:5, 22:1, 24:6, 24:29, 25:10, 36:24, 41:25, 53:25, 54:16, 54:28, 55:11, 59:2, 72:5, 72:25, 75:24, 85:19, 85:23, 96:11, 97:9, 107:27, 109:1, 109:20, 112:26, 120:19, 120:23, 124:8, 124:17, 124:26, 128:26, 129:14, 130:13, 131:25, 132:14, 137:25, 137:29, 139:1, 139:4, 139:19, 140:27, 141:28, 143:13, 147:24, 147:28, 148:17, 149:14, 149:18, 150:3, 150:9, 151:10, 156:10, 156:14, 156:19, 157:6, 157:27, 158:6, 163:27, 169:18, 171:25, 178:11, 181:9, 181:17, 182:20, 185:15, 187:20, 188:16, 200:18, 202:4, 204:25, 213:22, 217:19, 217:24, 219:2, 219:18, 219:29, 220:28, 221:4, 222:4, 222:25, 223:14, 223:22, 224:1, 224:7, 224:15, 224:17  
**Marisa's** [3] - 53:11, 57:3, 61:24  
**MARK** [2] - 2:19, 3:4  
**marked** [3] - 203:3, 203:6, 203:10  
**marker** [1] - 9:22  
**marking** [1] - 75:12  
**marks** [4] - 120:18, 123:5, 130:1, 131:13  
**married** [1] - 24:17  
**MARRINAN** [9] - 2:6, 4:28, 116:3, 116:7, 116:8, 118:20, 123:28, 133:15, 159:12  
**Martin** [12] - 72:27, 126:5, 159:19, 159:28, 160:10, 160:17, 171:12, 171:14, 171:16, 171:20, 171:27, 217:25  
**MARY** [2] - 5:6, 176:26  
**Mary** [9] - 166:6, 166:12, 166:14, 172:1, 173:22, 176:22, 185:11, 224:29, 226:23  
**material** [7] - 29:6, 136:28, 181:1, 181:7, 204:6, 204:8, 204:9  
**materials** [26] - 33:29, 35:14, 116:4, 156:11, 164:19, 176:12, 176:23, 178:19, 179:3, 179:18, 179:21, 180:7, 180:12, 180:15, 180:29, 181:6, 181:16, 186:3, 187:14, 188:1, 188:17, 189:6, 190:4, 190:19, 192:1, 192:6  
**matrix** [1] - 45:19  
**matter** [107] - 16:3, 17:23, 17:26, 20:22, 20:24, 22:25, 23:27, 26:22, 34:29, 35:19, 38:16, 39:25, 39:29, 43:20, 45:22, 46:29, 55:29, 59:3, 59:25, 59:27, 60:21, 61:14, 62:17, 62:28, 63:4, 63:25, 63:26, 64:18, 65:28, 66:28, 68:27, 70:29, 73:23, 73:25, 76:23, 77:24, 78:11, 78:12, 78:20, 78:23, 79:11, 79:28, 80:16, 80:20, 82:17, 84:24, 87:21, 88:4, 88:12, 88:29, 89:24, 90:17, 90:24, 92:17, 92:27, 93:23, 94:28, 96:7, 96:22, 97:18, 98:16, 98:25, 99:27, 100:19, 101:16, 102:4, 102:5, 102:19, 102:23, 103:13, 103:20, 103:24, 104:4, 104:6, 104:15, 105:14, 114:1, 118:7, 118:12, 121:18, 137:17, 140:24, 140:25, 179:24, 180:14, 180:26, 182:18, 183:8, 185:21, 187:26, 190:11, 193:27, 194:25, 200:21, 201:6, 207:2, 218:4, 219:10, 220:25, 221:11, 221:28, 224:13, 225:3, 225:6, 225:10, 226:26  
**matters** [56] - 10:2, 10:11, 12:8, 18:29, 26:9, 30:4, 30:14, 30:23, 36:6, 61:17, 63:10, 67:17, 68:13, 68:18, 68:23, 75:12, 79:25, 83:14, 85:8, 88:18, 90:15, 91:22, 92:19, 93:5, 94:13, 94:19, 95:2, 95:7, 101:13, 103:11, 105:8, 105:9, 105:15, 105:18, 105:19, 106:4, 113:22, 114:11, 125:28, 126:13, 140:10, 153:4, 166:3, 166:5, 170:13, 181:21, 186:25, 188:25, 189:8, 189:21, 189:24, 189:29, 190:13, 208:27, 221:24  
**MATTERS** [1] - 1:5  
**matters/instances** [1] - 46:28  
**Mavis** [1] - 31:19  
**Mayo** [1] - 220:4  
**McDermott** [35] - 2:15, 3:11, 24:27, 25:10, 33:18, 41:15, 72:18, 72:27, 80:13, 80:14, 96:11, 107:28, 126:8, 159:19, 159:28, 160:10, 171:12, 171:14, 171:17, 171:20, 171:27, 172:3, 173:25, 211:3, 216:17, 216:20, 217:25, 220:3, 220:27, 221:13, 221:20, 222:3, 222:9, 222:13, 222:20  
**McDermott** [1] - 72:17  
**McDermott's** [3] - 36:3, 179:19, 180:23  
**McDermotts** [1] - 73:4  
**McGinn** [66] - 3:7, 9:19, 16:7, 20:13, 21:3, 27:21, 38:15, 53:13, 56:18, 57:4, 61:25, 62:14, 62:19, 62:21, 62:22, 62:26, 98:12, 106:18, 107:16, 117:29, 120:14, 121:14, 132:22, 137:8, 137:24, 143:1, 144:7, 145:3, 145:11, 145:12, 146:14, 164:2, 177:27, 178:18, 178:21, 178:27, 179:7, 179:22, 181:24, 182:7, 182:10, 183:4, 185:13, 188:19, 189:4, 189:23, 191:5, 191:22, 191:26, 193:7, 193:21, 194:10, 194:16, 204:1, 205:3, 205:10, 205:28, 206:6, 206:26, 206:28, 207:25, 211:28, 218:9, 221:23, 222:27, 223:25  
**McGinn's** [4] - 9:4, 189:18, 189:20, 190:5  
**McGovern** [33] - 10:18, 10:25, 11:16, 16:5, 20:13, 20:23, 27:3, 28:15, 37:19, 38:15, 49:20, 64:13, 71:13, 71:28, 72:4, 73:16, 73:21, 74:14, 75:1, 75:9, 75:22, 84:28, 88:6, 88:23, 98:9, 99:24, 106:17, 113:17, 113:18, 114:14, 180:3, 224:2, 224:13  
**McGowan** [6] - 2:28, 26:10, 148:12, 218:23, 222:27, 224:3  
**McGowan's** [1] - 181:3  
**McGroary** [20] - 116:27, 117:9, 117:11, 126:5, 126:15, 132:4, 133:9, 135:20, 136:18, 136:23, 137:5, 138:19, 141:17, 143:29, 144:10, 144:26, 145:8, 145:10, 145:19, 159:20  
**McGroary's** [1] - 137:3  
**MCGUINNESS** [4] - 2:6, 4:21, 4:24, 65:4  
**McGuinness** [27] - 2:10, 4:15, 50:24, 51:18, 51:23, 51:24, 56:20, 56:27, 60:12, 60:18, 64:27, 65:1, 65:5, 67:27, 67:29, 68:8, 81:12, 107:9, 107:11, 110:4, 199:11, 199:14, 199:15, 199:21, 199:22, 215:20, 215:29  
**McGuinness's** [1] - 201:2  
**MCKECHNIE** [1] - 2:16  
**McLoughlin** [5] - 27:10, 27:12, 28:3, 192:4, 192:9  
**McLoughlin's** [1] - 190:2  
**McTeague** [3] - 225:17, 225:22, 226:1  
**mean** [14] - 44:19, 55:26, 69:25, 110:20, 159:2, 160:6, 160:26, 161:8, 175:22, 182:3, 201:17, 203:9, 214:23, 226:17  
**meaning** [4] - 87:25, 90:26, 90:27, 90:29  
**means** [5] - 86:7, 162:11, 164:1, 201:27  
**meant** [3] - 102:16, 102:18, 214:26  
**meant'** [1] - 215:14  
**mechanism** [8] - 13:17, 14:20, 69:20, 81:28, 85:5, 102:23, 105:21, 113:20  
**media** [3] - 184:7, 184:8, 194:25  
**medical** [1] - 86:23  
**meet** [12] - 110:28, 111:1, 117:21, 117:22, 125:20, 134:14, 167:9, 184:1, 198:18, 198:20, 212:22, 213:4  
**meeting** [113] - 7:25, 9:6, 9:9, 9:11, 9:25, 11:29, 16:24, 20:12, 20:19, 21:1, 21:8,

21:10, 22:4, 23:7, 29:14, 29:25, 30:10, 30:11, 30:29, 31:2, 36:19, 36:20, 36:22, 37:17, 37:22, 37:23, 37:24, 38:29, 39:8, 39:10, 40:3, 40:4, 40:5, 40:6, 40:8, 40:10, 42:23, 43:1, 43:3, 43:13, 43:14, 43:16, 47:7, 51:11, 51:12, 52:11, 54:1, 54:15, 55:3, 55:8, 58:22, 63:21, 63:24, 101:25, 118:21, 119:12, 119:29, 120:1, 121:21, 126:23, 128:19, 131:28, 132:14, 140:7, 140:23, 141:15, 145:22, 146:11, 146:13, 146:26, 147:1, 148:14, 152:5, 168:6, 168:12, 168:19, 168:24, 168:27, 168:29, 169:4, 169:5, 169:8, 169:14, 169:26, 174:4, 174:16, 174:28, 175:4, 175:8, 175:9, 175:11, 175:15, 175:19, 175:21, 183:3, 184:5, 187:5, 193:7, 193:12, 194:15, 194:17, 194:18, 198:22, 204:2, 205:2, 206:21, 219:11, 219:12, 219:15, 223:13

**meetings** [2] - 7:9, 206:29

**Melissa** [3] - 85:22, 119:19, 120:19

**member** [51] - 13:26, 14:10, 14:11, 24:14, 39:6, 46:29, 50:5, 65:25, 65:26, 69:18, 71:27, 71:28, 79:15, 86:11, 87:7, 87:14, 87:17, 90:2, 90:13, 90:16, 90:19, 91:24, 92:2, 93:9, 93:10, 95:14, 106:14, 106:20, 106:21, 106:28, 106:29, 107:2, 107:5, 108:16, 109:17, 110:18, 111:26, 118:7, 159:27, 168:18, 188:10, 188:13, 197:19, 197:22, 197:23, 197:27, 198:3, 212:29, 213:5

**MEMBER** [2] - 1:12, 2:2

**members** [11] - 7:11, 26:5, 48:14, 91:6, 106:5, 106:27, 106:29, 136:5, 148:12, 197:13, 222:18

**memo** [1] - 149:2

**memory** [7] - 152:29, 153:12, 169:15, 169:29, 171:23, 182:21, 182:25

**mention** [11] - 22:19, 22:28, 23:1, 31:1, 59:11, 63:2, 76:4, 161:6, 204:24, 204:28, 207:13

**mentioned** [13] - 29:8, 49:3, 62:15, 62:29, 89:29, 90:1, 106:9, 106:11, 156:15, 171:14, 182:26, 219:4, 219:15

**mentioning** [1] - 140:15

**merits** [1] - 12:2

**message** [2] - 142:19, 143:12

**messages** [1] - 142:18

**Met** [1] - 193:21

**met** [25] - 34:25, 35:4, 52:9, 53:7, 54:28, 61:16, 62:24, 62:25, 103:1, 103:6, 118:25, 119:1, 119:2, 123:13, 125:24, 141:18, 143:4, 154:9, 178:17, 178:27, 179:6, 182:9, 206:28, 219:9, 219:13

**method** [1] - 10:5

**methods** [1] - 12:29

**Metropolitan** [1] - 113:23

**MICHAEL** [5] - 2:29, 4:9, 32:5, 40:25, 51:1

**Michael** [1] - 32:2

**mid** [1] - 186:7

**mid-May** [1] - 186:7

**midday** [1] - 71:19

**middle** [1] - 75:14

**midway** [1] - 130:23

**might** [38] - 8:14, 15:2, 15:5, 18:19, 18:22, 20:7, 40:23, 60:14, 61:11, 68:20, 69:4, 88:19, 95:25, 97:28, 99:13, 133:24, 139:15, 140:28, 141:22, 143:16, 148:3, 148:13, 150:6, 158:9, 160:1, 160:7, 170:6, 182:24, 192:29, 196:16, 198:17, 201:21, 208:16, 208:29, 217:15, 217:26, 218:3, 224:15

**mightn't** [4] - 13:10, 143:4, 175:17

**Milford** [12] - 34:18, 35:24, 49:13, 49:17, 71:29, 116:29, 118:13, 135:1, 135:3, 141:16, 142:27, 167:10

**mill'** [1] - 138:27

**mind** [16] - 13:9, 22:13, 23:4, 53:29, 59:20, 135:25, 152:17, 153:3, 157:27, 159:5, 163:18, 164:24, 186:27, 194:24, 226:16

**mind's** [1] - 153:25

**mine** [1] - 139:15

**MINISTER** [1] - 1:8

**minister** [1] - 227:1

**Minister** [1] - 80:23

**minor** [5] - 12:8, 12:18, 14:29, 73:13, 73:14

**minute** [2] - 28:17, 114:15

**minutes** [13] - 114:7, 114:10, 114:12, 114:15, 132:9, 157:2, 158:28, 159:1, 205:4, 205:8, 216:20, 216:29

**misbehaviour** [3] - 79:16, 92:3, 108:16

**misconduct** [7] - 67:6, 67:14, 68:11, 93:23, 106:4, 106:5, 107:1

**misinterpreted** [1] - 130:14

**missed** [2] - 143:18, 210:7

**missing** [1] - 88:8

**mistake** [4] - 142:26, 199:3, 199:6, 201:15

**mistakes** [1] - 201:22

**misunderstanding** [2] - 103:4, 149:9

**misunderstood** [2] - 63:20, 148:23

**mix** [1] - 96:19

**mixed** [1] - 142:17

**mobile** [7] - 113:29, 119:18, 126:6, 145:9, 158:1, 158:15, 198:23

**mobility** [1] - 86:10

**moderate** [1] - 138:15

**moment** [8] - 93:16, 107:20, 118:21, 120:24, 124:6, 189:16, 201:20, 217:14

**Monaghan** [2] - 28:28, 116:12

**Monday** [5] - 36:17, 168:10, 169:9, 169:10, 169:11

**money** [4] - 93:11, 93:12, 93:16, 135:27

**month** [4] - 35:6, 195:18, 208:8

**months** [10] - 48:4, 48:5, 116:18, 116:21, 165:13, 177:12, 185:3, 185:15, 205:12, 208:7

**Moore** [4] - 166:18, 167:12, 173:21, 174:13

**Moore's** [1] - 173:27

**morning** [9] - 6:8, 6:9, 146:1, 147:1, 147:3, 156:22, 215:27, 216:26, 227:11

**Morris** [1] - 133:25

**most** [11] - 12:6, 31:10, 54:4, 140:9, 145:21, 154:8, 161:19, 161:21, 183:16, 199:25, 208:27

**mostly** [1] - 43:1

**mother** [7] - 72:7, 107:27, 125:15, 131:25, 182:15, 204:22, 215:1

**motivated** [1] - 225:24

**motivation** [1] - 104:24

**motive** [1] - 222:17

**mouth** [1] - 223:4

**move** [5] - 24:5, 24:26, 25:16, 142:12, 143:3

**moved** [10] - 32:20, 32:27, 41:2, 47:28, 48:2, 48:3, 155:5, 162:24, 163:8, 202:20

**movements** [1] - 43:9

**Moville** [1] - 32:13

**moving** [7] - 32:25, 35:28, 41:25, 116:21, 140:4, 143:7

**MR** [170] - 1:12, 2:2, 2:4, 2:6, 2:6, 2:9, 2:9, 2:10, 2:10, 2:11, 2:11, 2:15, 2:19, 2:19, 2:20, 2:23, 2:23, 2:24, 2:28, 2:29, 3:3, 3:3, 3:4, 3:7, 3:8, 3:11, 4:5, 4:6, 4:11, 4:14, 4:15, 4:16, 4:18, 4:20, 4:21, 4:22, 4:23, 4:24, 4:28, 4:29, 4:30, 4:32, 5:3, 5:8, 5:9, 6:7, 6:8, 30:18, 30:20, 30:22, 30:23, 31:5, 40:26, 40:27, 50:23, 50:24, 51:18, 51:22, 51:23, 51:24, 56:20, 56:22, 56:23, 56:24, 60:12, 60:22, 61:5, 61:9, 61:12, 62:9, 62:11, 63:15, 63:16, 64:25, 64:27, 65:1, 65:3, 65:4, 65:5, 67:25, 67:29, 68:8, 81:12, 81:16, 81:17, 94:3, 100:23, 100:26, 100:27, 100:29, 101:1, 107:7, 107:9, 107:11, 110:4, 116:3, 116:7, 116:8, 118:18, 118:20, 123:28, 133:15, 133:18, 133:19, 144:12, 144:15, 144:24, 148:1, 148:3, 148:7, 148:9, 148:10, 158:18, 158:25, 158:29, 159:3, 159:8, 159:11, 159:12, 163:16, 163:21, 163:22, 164:12, 170:9, 170:11, 170:29, 175:24, 175:25, 175:26, 175:27, 193:2, 193:3, 196:25, 196:29, 199:6, 199:11, 199:15, 199:16, 199:22, 200:8,

200:25, 201:5,  
201:13, 201:19,  
202:1, 203:10,  
203:22, 203:24,  
205:2, 210:4, 210:29,  
211:2, 211:3, 211:4,  
211:5, 211:8, 211:10,  
214:5, 215:20,  
215:29, 216:4,  
216:15, 216:18,  
216:20, 216:23,  
216:29, 217:3  
**MS** [39] - 2:7, 2:7,  
2:12, 2:16, 3:11, 4:10,  
4:12, 5:2, 5:4, 6:4,  
31:7, 32:1, 32:6, 32:7,  
40:22, 51:2, 51:3,  
51:14, 72:23, 73:8,  
73:16, 73:17, 73:25,  
73:29, 85:19, 164:17,  
164:22, 164:23,  
170:5, 175:29, 176:1,  
176:15, 176:21,  
176:27, 176:28,  
186:29, 189:17,  
192:28, 214:7  
**Muff** [1] - 32:12  
**MULLAN** [1] - 2:7  
**MULLANEY** [1] - 3:4  
**MULLANEYS** [1] -  
3:4  
**mum** [1] - 154:28  
**MURPHY** [1] - 2:10  
**MURRAY** [6] - 5:6,  
5:7, 176:26, 193:2,  
211:8, 214:11  
**Murray** [19] - 64:15,  
64:19, 64:22, 176:22,  
176:28, 183:12,  
185:11, 193:3, 196:6,  
196:13, 200:26,  
203:29, 211:1,  
211:10, 214:5,  
224:29, 226:24  
**must** [10] - 13:22,  
65:28, 94:5, 95:16,  
96:9, 129:20, 163:5,  
197:28, 199:16, 216:4  
**MÍCHEÁL** [1] - 2:9

## N

**N** [1] - 200:3  
**name** [7] - 24:12,  
56:24, 63:16, 171:20,  
171:22, 172:27,  
172:29  
**named** [3] - 1:27,  
73:2, 81:5

**namely** [1] - 124:19  
**national** [1] - 184:8  
**nature** [15] - 10:29,  
12:3, 12:21, 82:17,  
85:10, 97:21, 99:21,  
129:3, 129:27, 134:3,  
135:5, 138:15,  
138:21, 172:22, 199:8  
**navigate** [1] - 69:15  
**navigating** [1] -  
97:21  
**near** [1] - 93:19  
**nearly** [1] - 153:17  
**necessarily** [1] -  
226:17  
**necessary** [8] -  
34:10, 82:23, 102:20,  
102:29, 103:14,  
103:23, 203:16,  
210:20  
**necessity** [1] - 226:7  
**need** [21] - 17:27,  
28:20, 68:26, 73:26,  
73:27, 82:26, 87:15,  
100:13, 100:14,  
104:22, 106:4,  
108:11, 114:17,  
140:8, 142:17,  
175:18, 208:15,  
209:20, 209:22, 216:9  
**needed** [10] - 20:22,  
20:24, 41:20, 146:6,  
151:13, 157:21,  
200:12, 208:23,  
208:24, 208:25  
**needn't** [1] - 131:24  
**needs** [2] - 198:3,  
220:29  
**negligently** [1] -  
65:28  
**neighbouring** [1] -  
134:22  
**nervous** [3] - 119:14,  
151:3, 152:6  
**nervousness** [1] -  
153:1  
**neutrally** [1] - 220:1  
**never** [22] - 7:11,  
11:16, 62:15, 62:18,  
69:17, 90:1, 90:6,  
99:15, 102:14,  
103:22, 111:3, 111:4,  
115:8, 119:2, 121:27,  
142:3, 155:22,  
161:24, 183:16,  
217:11, 219:13  
**new** [3] - 14:20,  
139:14, 162:24  
**newly** [1] - 70:25  
**next** [33] - 23:10,

24:26, 25:16, 26:3,  
32:1, 39:16, 51:18,  
65:1, 72:10, 88:9,  
123:1, 125:2, 128:23,  
129:22, 141:24,  
142:12, 143:3,  
146:12, 159:3,  
164:17, 166:3, 166:6,  
166:10, 176:21,  
180:1, 180:7, 180:14,  
181:14, 187:13,  
188:15, 195:24,  
221:28, 223:24  
**NIALL** [1] - 3:11  
**nicely** [1] - 66:24  
**niece** [2] - 63:6,  
63:22  
**night** [6] - 73:8,  
133:8, 141:16,  
143:11, 166:5, 221:16  
**night** [1] - 73:7  
**no** [2] - 78:5, 130:3  
**nobody** [8] - 16:11,  
16:18, 20:8, 42:10,  
89:29, 146:6, 146:18,  
146:24  
**NOEL** [1] - 2:11  
**nominate** [1] - 28:28  
**non** [1] - 103:12  
**non-criminal** [1] -  
103:12  
**nondescript** [1] -  
163:7  
**none** [7] - 19:27,  
51:8, 76:6, 99:22,  
110:16, 110:22, 131:1  
**normal** [6] - 92:29,  
120:1, 181:29, 215:26  
**normally** [17] -  
117:21, 132:25,  
134:15, 134:29,  
137:6, 137:14,  
138:16, 141:22,  
141:24, 142:9,  
154:24, 157:11,  
166:10, 182:2, 184:5,  
212:25  
**northern** [2] - 32:27,  
177:19  
**Northern** [1] - 167:23  
**notate** [1] - 140:10  
**notations** [1] - 140:2  
**note** [42] - 15:16,  
19:21, 40:4, 40:7,  
40:9, 40:12, 46:1,  
47:2, 85:16, 88:1,  
89:9, 108:24, 108:25,  
120:24, 125:16,  
125:21, 127:2,  
127:21, 128:7,

128:11, 128:29,  
130:11, 132:5, 134:8,  
139:1, 139:3, 139:6,  
152:20, 157:14,  
172:22, 193:6,  
193:11, 193:21,  
194:23, 194:29,  
195:1, 195:3, 195:15,  
195:16, 195:19,  
206:19  
**notebook** [1] - 43:28  
**noted** [22] - 9:13,  
43:24, 45:24, 47:3,  
47:18, 77:12, 95:20,  
96:8, 97:8, 105:24,  
114:25, 121:1,  
127:15, 129:25,  
130:7, 139:8, 139:13,  
148:22, 150:21,  
151:8, 152:12, 184:2  
**notes** [59] - 1:27, 7:9,  
7:12, 9:17, 9:18, 9:20,  
9:23, 30:13, 40:2,  
40:15, 43:24, 44:2,  
48:29, 71:14, 71:21,  
75:10, 77:9, 77:20,  
88:1, 96:1, 99:24,  
114:2, 118:20, 121:1,  
124:4, 124:6, 126:23,  
128:15, 129:27,  
132:4, 133:14,  
139:15, 139:19,  
140:8, 141:6, 141:14,  
150:21, 157:19,  
168:23, 173:9,  
173:10, 173:12,  
173:13, 173:14,  
173:17, 173:19,  
175:8, 175:15,  
175:16, 175:18,  
175:20, 175:22,  
193:4, 194:15,  
194:20, 223:10,  
224:3, 225:18  
**notetaker** [5] - 7:4,  
7:15, 30:9, 139:7,  
139:12  
**nothing** [32] - 20:8,  
20:16, 20:27, 31:7,  
47:13, 47:15, 100:12,  
100:15, 100:20,  
110:26, 130:2, 130:9,  
130:10, 139:14,  
140:17, 161:16,  
170:14, 173:23,  
174:2, 175:13,  
175:26, 181:11,  
197:26, 200:7,  
200:10, 202:3,  
203:19, 203:23,

204:10, 204:12,  
204:13, 214:7  
**notice** [7] - 27:13,  
93:26, 95:3, 96:4,  
184:24, 189:9, 198:6  
**notice** [1] - 197:25  
**noticed** [1] - 204:5  
**notification** [3] - 8:7,  
93:13, 187:24  
**notifications** [2] -  
67:19, 101:8  
**notified** [4] - 14:14,  
74:22, 89:24, 217:28  
**notify** [5] - 42:3,  
183:20, 197:19,  
197:22, 197:28  
**notifying** [2] -  
113:27, 186:19  
**notion** [3] - 69:29,  
70:11, 102:12  
**November** [8] -  
17:17, 24:19, 28:20,  
54:12, 116:13,  
179:23, 218:7, 224:12  
**null** [1] - 19:1  
**number** [39] - 26:5,  
44:17, 48:4, 52:19,  
56:25, 68:10, 70:23,  
73:15, 82:18, 88:4,  
88:5, 91:7, 113:25,  
113:29, 132:6, 142:9,  
143:5, 151:4, 154:12,  
165:13, 166:13,  
167:2, 172:2, 172:4,  
172:8, 186:27,  
187:10, 187:11,  
191:13, 191:21,  
205:11, 205:12,  
206:5, 208:4, 209:3,  
212:15, 219:5, 224:9,  
226:25  
**nurse** [1] - 125:16

## O

**O'Brien** [1] - 8:23  
**o'clock** [6] - 129:22,  
132:2, 132:9, 141:22,  
144:20, 167:11  
**O'Doherty** [12] -  
74:8, 76:8, 77:11,  
77:21, 78:21, 78:24,  
78:25, 98:19, 98:20,  
105:26, 105:27,  
109:27  
**O'Doherty's** [2] -  
108:23, 109:4  
**O'Donnell** [13] -  
10:20, 37:19, 38:1,

164:18, 164:23,  
166:6, 166:12,  
166:14, 166:21,  
170:11, 172:1,  
173:22, 176:2  
**O'DONNELL** [3] -  
5:1, 164:21, 170:8  
**O'HIGGINS** [5] - 2:9,  
4:6, 30:22, 30:23,  
31:5  
**O'NEILL** [1] - 3:11  
**objection** [1] - 201:2  
**obligation** [4] - 66:2,  
82:27, 82:28, 100:16  
**obligations** [1] - 83:1  
**obliged** [7] - 13:14,  
14:28, 46:1, 83:28,  
86:22, 86:26, 93:22  
**observation** [2] -  
125:8, 125:12  
**observations** [1] -  
27:7  
**obtained** [3] - 53:14,  
57:5, 61:26  
**obtaining** [1] -  
127:10  
**obvious** [1] - 65:25  
**obviously** [31] -  
25:14, 53:18, 54:18,  
55:21, 65:15, 67:3,  
68:17, 69:6, 84:23,  
86:24, 119:28, 128:2,  
129:25, 130:6,  
132:11, 137:12,  
157:2, 169:3, 169:19,  
172:3, 172:10, 173:2,  
186:13, 190:27,  
191:16, 193:19,  
196:9, 207:7, 208:25,  
210:14, 214:3  
**occasion** [4] - 44:13,  
52:14, 88:28, 191:17  
**occasions** [7] -  
70:23, 88:4, 124:9,  
135:28, 178:14,  
187:21, 207:1  
**occupy** [1] - 48:3  
**occurred** [12] -  
34:19, 57:6, 61:27,  
86:27, 88:15, 156:7,  
166:19, 167:13,  
168:12, 168:29,  
169:4, 169:5  
**OCTOBER** [3] - 1:18,  
6:2, 227:15  
**October** [69] - 7:18,  
8:25, 9:6, 18:3, 22:4,  
30:2, 30:10, 31:1,  
33:5, 36:1, 36:2, 36:3,  
36:11, 41:29, 42:10,  
42:11, 42:18, 47:7,  
47:29, 48:3, 49:9,  
53:12, 57:3, 61:24,  
65:10, 71:11, 71:17,  
77:10, 89:15, 95:20,  
107:17, 109:2,  
116:25, 117:6,  
117:12, 118:27,  
123:2, 126:29,  
129:16, 136:19,  
143:12, 143:14,  
144:13, 144:27,  
146:28, 148:14,  
156:7, 157:28,  
158:13, 165:21,  
172:1, 172:23, 174:5,  
176:4, 177:3, 179:19,  
180:9, 188:12,  
202:22, 222:9,  
222:12, 222:19,  
222:25, 223:7,  
223:13, 223:21,  
223:24, 224:1, 224:6  
**October"** [1] -  
129:15  
**odd** [1] - 173:23  
**OF** [4] - 1:3, 1:9,  
1:12, 2:3  
**offences** [2] -  
103:12, 174:23  
**offer** [7] - 43:11,  
55:14, 55:17, 55:21,  
55:22, 125:26, 128:4  
**offered** [1] - 134:5  
**OFFICE** [1] - 2:12  
**office** [33] - 6:11,  
8:13, 12:12, 17:1,  
17:24, 21:15, 24:15,  
27:25, 28:12, 32:28,  
36:18, 44:3, 77:7,  
77:18, 80:25, 85:27,  
86:1, 86:2, 89:18,  
101:9, 104:17,  
108:13, 108:19,  
136:26, 165:7,  
166:26, 168:17,  
177:18, 206:9, 225:16  
**officer** [36] - 10:22,  
15:13, 30:3, 33:4,  
33:7, 34:18, 42:20,  
45:2, 46:22, 51:25,  
51:29, 52:15, 58:4,  
58:7, 65:6, 65:11,  
78:21, 78:23, 84:11,  
97:29, 116:23,  
125:29, 126:21,  
135:7, 170:18,  
170:20, 170:23,  
170:24, 170:25,  
170:27, 177:27,  
186:21, 193:26,  
199:29, 200:14  
**officers** [19] - 35:24,  
45:21, 45:24, 46:1,  
47:2, 47:4, 97:1,  
170:12, 170:29,  
171:1, 171:7, 184:22,  
193:4, 193:10,  
193:11, 194:4,  
206:19, 206:22, 226:6  
**offices** [1] - 83:10  
**officially** [1] - 92:21  
**often** [4] - 82:23,  
83:17, 161:17, 161:19  
**old** [1] - 208:7  
**Ombudsman** [7] -  
14:6, 51:25, 65:6,  
84:10, 92:3, 92:6,  
106:23  
**ON** [4] - 1:6, 1:10,  
1:18, 6:1  
**on-call** [1] - 113:25  
**on/off** [1] - 161:4  
**once** [13] - 9:2,  
69:17, 83:28, 86:26,  
87:19, 100:4, 108:1,  
111:25, 138:26,  
184:16, 190:8,  
190:10, 210:2  
**one** [81] - 7:10,  
11:17, 13:2, 13:5,  
13:6, 19:23, 22:11,  
33:16, 33:27, 44:16,  
45:19, 45:23, 48:16,  
51:10, 53:1, 61:14,  
66:17, 68:29, 69:1,  
69:19, 70:9, 78:3,  
78:15, 78:16, 80:22,  
85:8, 91:1, 96:13,  
98:1, 100:2, 104:20,  
104:25, 106:8,  
107:20, 111:1,  
113:18, 114:15,  
119:26, 123:15,  
123:28, 133:27,  
133:29, 139:16,  
140:7, 142:8, 142:11,  
143:20, 149:14,  
151:18, 151:19,  
152:14, 155:15,  
156:6, 157:20,  
159:18, 160:27,  
161:11, 162:4,  
163:16, 176:1,  
187:26, 194:6,  
199:15, 201:21,  
203:10, 203:14,  
204:1, 210:16,  
214:13, 216:20,  
216:25, 219:14,  
219:15, 219:24,  
220:3, 220:15, 226:9  
**one-to-one** [1] -  
204:1  
**ones** [7] - 15:7,  
15:10, 15:14, 15:15,  
15:17, 15:18, 15:21  
**ongoing** [10] - 8:8,  
19:28, 21:5, 21:11,  
21:16, 21:17, 21:20,  
72:5, 72:6, 72:8  
**onwards** [2] -  
180:22, 181:16  
**open** [4] - 53:29,  
86:18, 179:11, 215:12  
**opened** [5] - 84:4,  
99:2, 156:13, 192:23,  
205:10  
**opening** [1] - 33:21  
**openly** [3] - 53:10,  
57:1, 61:22  
**operating** [2] -  
67:11, 67:13  
**operation** [2] - 37:8,  
46:24  
**operational** [5] -  
46:20, 46:25, 171:1,  
177:5, 177:7  
**Operations** [1] -  
108:29  
**operations** [2] -  
74:8, 84:8  
**opinion** [29] - 10:10,  
15:28, 20:21, 20:24,  
55:14, 55:16, 55:18,  
55:21, 55:22, 55:25,  
55:27, 59:6, 59:18,  
60:3, 60:4, 63:11,  
64:10, 87:6, 96:6,  
105:22, 105:23,  
105:28, 121:19,  
128:8, 130:21,  
152:19, 153:7,  
153:21, 216:4  
**opportunity** [3] -  
198:19, 215:10,  
215:11  
**opposed** [3] -  
181:29, 202:18, 219:5  
**opposite** [1] - 162:18  
**oppressive** [1] -  
199:8  
**option** [1] - 140:6  
**options** [2] - 82:18,  
102:24  
**oral** [1] - 216:9  
**ordained** [1] - 226:17  
**order** [12] - 26:26,  
68:27, 119:21, 127:7,  
127:10, 142:18,  
150:11, 156:16,  
156:25, 178:18,  
213:17, 226:6  
**order"** [1] - 127:6  
**ordinarily** [7] - 6:27,  
7:8, 7:15, 10:21,  
81:19, 91:21  
**ordinary** [6] -  
161:24, 165:19,  
199:19, 203:4, 203:7,  
203:9  
**organ** [1] - 86:11  
**organisation** [4] -  
66:29, 99:3, 184:20,  
218:11  
**organisations** [1] -  
174:27  
**origin** [3] - 122:12,  
148:22, 148:28  
**original** [4] - 108:1,  
134:9, 198:7, 198:11  
**originally** [2] - 34:27,  
125:18  
**originals** [1] - 141:7  
**OSMOND** [1] - 2:13  
**OTHER** [1] - 1:4  
**otherwise** [2] - 98:4,  
103:16  
**ought** [3] - 49:29,  
91:21, 194:3  
**ourselves** [1] - 92:18  
**outcome** [2] -  
189:25, 190:1  
**outline** [4] - 6:10,  
32:8, 174:12, 176:29  
**outlined** [8] - 48:11,  
66:18, 105:3, 128:18,  
130:5, 168:19,  
173:27, 178:29  
**outlines** [1] - 91:7  
**outlining** [2] - 80:27,  
167:13  
**outs** [2] - 111:24,  
205:14  
**outside** [6] - 17:25,  
28:26, 199:12,  
199:13, 209:25, 221:5  
**overheard** [1] -  
167:22  
**overnight** [2] -  
216:16, 216:25  
**own** [10] - 13:10,  
45:1, 48:21, 60:4,  
66:18, 93:3, 93:28,  
111:13, 113:22,  
154:27



**P**

**PADRAIG** [1] - 2:23  
**page** [75] - 17:14, 17:15, 23:23, 24:6, 24:26, 25:9, 25:16, 26:9, 27:20, 32:2, 33:29, 35:14, 51:20, 53:2, 56:28, 58:11, 67:22, 71:20, 75:14, 76:28, 81:1, 106:10, 106:11, 107:15, 108:5, 108:23, 109:11, 109:13, 116:4, 117:9, 118:13, 123:19, 123:21, 126:23, 131:7, 139:16, 143:12, 143:22, 156:11, 164:18, 176:12, 176:23, 176:24, 178:8, 179:3, 179:18, 179:21, 180:2, 180:11, 180:14, 180:22, 180:28, 181:6, 181:15, 184:25, 185:8, 186:2, 186:27, 186:28, 187:13, 187:14, 188:1, 188:17, 189:6, 190:3, 190:19, 192:1, 192:5, 196:29, 198:6, 205:27, 206:3, 206:4, 227:1  
**PAGE** [1] - 4:2  
**pages** [5] - 77:3, 77:4, 77:5, 139:15, 206:5  
**paid** [2] - 93:11, 93:14  
**pan** [1] - 161:23  
**paper** [4] - 29:5, 35:3, 45:25, 219:22  
**papers** [6] - 29:11, 157:18, 178:24, 193:9, 200:11, 200:12  
**paperwork** [8] - 7:27, 7:28, 15:20, 15:23, 34:26, 194:7, 194:8, 207:11  
**paragraph** [10] - 23:24, 53:3, 75:16, 89:13, 106:12, 106:13, 108:26, 124:29, 125:2, 187:5  
**paragraphs** [1] - 109:12  
**paramilitary** [2] - 126:11, 153:24

**paraphrase** [1] - 57:10  
**pardon** [3] - 148:7, 206:15, 209:17  
**PARLIAMENT** [1] - 2:25  
**part** [35] - 16:29, 21:17, 33:12, 41:5, 41:11, 42:21, 42:22, 52:24, 54:6, 54:11, 54:18, 54:20, 63:3, 74:24, 75:20, 99:23, 119:6, 119:28, 135:19, 141:14, 151:2, 153:17, 174:16, 183:18, 184:18, 184:19, 184:20, 201:25, 210:7, 218:12, 220:9, 220:22  
**Part** [4] - 90:26, 90:28, 92:9, 94:4  
**partaking** [1] - 10:14  
**particular** [22] - 40:17, 77:28, 84:26, 86:11, 90:28, 154:2, 154:4, 159:28, 160:25, 174:23, 178:3, 182:28, 184:15, 195:18, 197:12, 207:11, 212:28, 213:5, 223:9, 226:20, 227:9  
**particularly** [4] - 62:1, 99:7, 131:1, 173:23  
**parties** [2] - 24:5, 80:22  
**partner** [6] - 119:19, 120:29, 121:9, 127:10, 153:27, 199:2  
**parts** [3] - 85:3, 126:24, 134:25  
**party** [3] - 104:13, 135:14, 183:20  
**passed** [2] - 132:21, 218:22  
**PASSED** [1] - 1:5  
**past** [1] - 57:23  
**Patrick** [1] - 164:18  
**PATRICK** [3] - 2:6, 5:1, 164:21  
**patrols** [3] - 42:9, 133:9, 133:10  
**Paul** [1] - 116:3  
**PAUL** [4] - 2:15, 2:19, 4:27, 116:6  
**Paula** [3] - 36:3, 222:3, 222:20  
**Pauline** [1] - 52:15

**pause** [1] - 74:28  
**Pearse** [1] - 177:16  
**pedantic** [1] - 98:21  
**pending** [5] - 48:23, 74:24, 189:25, 189:29, 190:22  
**people** [40] - 6:18, 10:13, 10:14, 12:27, 20:25, 20:27, 20:29, 21:1, 21:11, 21:26, 23:5, 31:10, 70:24, 92:10, 110:17, 113:9, 113:25, 125:19, 125:21, 132:24, 139:27, 147:5, 147:12, 147:18, 159:17, 160:28, 161:26, 162:4, 167:22, 167:26, 199:18, 201:21, 203:20, 203:25, 215:4, 218:17, 225:25, 227:7  
**per** [1] - 188:6  
**perceived** [1] - 155:29  
**percent** [2] - 8:23, 46:2  
**perfectly** [2] - 201:17, 203:24  
**performed** [2] - 50:5, 177:11  
**performing** [3] - 85:27, 86:2, 165:15  
**perhaps** [20] - 11:1, 49:22, 56:9, 71:20, 76:3, 78:15, 81:3, 98:8, 121:29, 126:24, 159:8, 210:26, 215:23, 216:7, 220:29, 222:18, 224:7, 224:10, 225:17, 225:26  
**period** [10] - 8:25, 55:8, 183:25, 189:10, 197:3, 201:11, 207:1, 212:16, 212:21, 218:14  
**periods** [1] - 131:6  
**permanent** [2] - 136:2, 191:8  
**permitted** [1] - 188:11  
**person** [50] - 7:8, 13:2, 16:26, 35:3, 68:19, 79:18, 79:22, 82:1, 82:5, 84:8, 87:21, 91:28, 92:11, 92:14, 92:24, 93:13, 93:17, 94:4, 98:14,

110:18, 110:20, 110:25, 112:16, 112:19, 113:16, 113:27, 117:22, 134:5, 134:14, 138:7, 146:18, 146:20, 147:20, 150:23, 150:25, 159:29, 161:8, 167:19, 171:21, 172:25, 172:26, 173:5, 175:3, 184:5, 186:10, 191:15, 209:29, 214:26, 214:27, 226:18  
**personal** [8] - 24:7, 24:11, 154:5, 181:13, 193:13, 193:14, 193:18, 198:23  
**personally** [5] - 62:22, 181:28, 184:2, 197:18, 213:4  
**personnel** [2] - 24:14, 206:8  
**perspective** [2] - 213:11, 213:14  
**PETER** [4] - 1:12, 2:2, 2:4, 2:19  
**Peter** [1] - 56:24  
**phone** [57] - 15:15, 19:6, 19:12, 36:17, 37:10, 58:8, 65:20, 65:22, 70:8, 70:27, 71:5, 71:11, 74:12, 74:16, 74:29, 76:7, 77:12, 77:17, 82:21, 85:24, 88:28, 96:3, 109:25, 113:18, 113:19, 113:25, 113:29, 124:25, 126:6, 129:20, 133:12, 134:15, 139:5, 144:4, 144:16, 145:6, 153:24, 156:23, 157:21, 158:1, 158:15, 160:19, 166:24, 168:1, 168:4, 172:1, 172:22, 172:23, 173:3, 173:16, 173:18, 173:24, 174:14, 187:10, 221:13, 222:10  
**phoned** [4] - 37:11, 82:12, 145:2, 145:3  
**phoning** [2] - 76:8, 114:18  
**photocopy** [1] - 75:16  
**phrase** [6] - 101:19,

101:29, 136:8, 138:27, 148:27, 224:24  
**phrasing** [1] - 163:22  
**physical** [5] - 99:11, 134:25, 138:13, 140:5, 188:2  
**physically** [3] - 25:15, 178:10, 187:18  
**pick** [1] - 102:13  
**picked** [3] - 135:14, 188:5, 188:12  
**picks** [1] - 220:27  
**piece** [3] - 69:14, 90:22, 156:6  
**PLACE** [19] - 2:30  
**place** [19] - 7:9, 36:19, 38:14, 42:18, 53:14, 57:5, 61:26, 88:19, 100:8, 133:26, 136:10, 147:1, 162:19, 163:8, 167:5, 169:6, 206:21, 210:19  
**placed** [3] - 100:17, 189:24, 191:8  
**places** [1] - 111:11  
**placing** [1] - 190:21  
**plain** [1] - 199:19  
**plan** [3] - 54:11, 162:26, 218:12  
**play** [2] - 96:9, 133:22  
**pleaded** [1] - 220:8  
**Pluck** [1] - 125:19  
**plus** [3] - 183:28, 197:22, 198:24  
**pocketed** [1] - 93:12  
**point** [37] - 9:9, 27:12, 30:25, 35:23, 39:19, 41:24, 41:29, 44:10, 44:17, 66:9, 68:17, 76:21, 88:2, 88:19, 92:8, 95:5, 95:27, 97:2, 124:24, 139:11, 155:16, 158:27, 184:10, 184:16, 186:17, 188:2, 199:27, 201:3, 201:5, 201:23, 205:17, 208:7, 211:26, 222:23, 226:19, 226:20  
**pointed** [2] - 42:21, 88:27  
**points** [4] - 9:14, 100:2, 217:16  
**police** [3] - 45:2, 138:12, 170:24  
**policemen** [2] - 139:6, 139:8

**policies** [1] - 99:4  
**policing** [2] - 37:6, 177:7  
**populated** [1] - 23:17  
**portfolios** [2] - 142:9, 165:16  
**posing** [1] - 18:12  
**position** [16] - 33:7, 44:28, 55:17, 61:9, 66:16, 70:7, 111:11, 111:22, 115:13, 125:9, 125:10, 165:16, 177:24, 216:15, 216:16, 216:21  
**positive** [1] - 100:16  
**possession** [1] - 213:6  
**possibilities** [2] - 35:25, 35:27  
**possibility** [2] - 86:21, 144:9  
**possible** [12] - 24:1, 28:21, 83:22, 144:6, 145:2, 145:11, 160:5, 169:20, 169:23, 175:1, 220:1, 224:4  
**possibly** [26] - 8:27, 15:15, 18:24, 18:27, 20:20, 23:10, 74:25, 82:25, 113:12, 114:7, 141:17, 142:10, 154:24, 155:18, 163:10, 174:23, 175:9, 182:22, 182:24, 198:7, 200:29, 202:7, 206:29, 208:16, 211:29  
**post** [10] - 47:19, 83:8, 142:10, 178:23, 179:1, 182:1, 182:2, 198:12, 203:12, 212:26  
**potential** [7] - 36:2, 42:4, 83:15, 99:19, 119:9, 160:5, 171:12  
**potentially** [1] - 30:14  
**power** [9] - 70:21, 71:7, 71:9, 79:4, 100:6, 110:10, 110:13, 111:9, 216:27  
**POWER** [1] - 3:7  
**powers** [4] - 69:11, 69:12, 88:14, 218:18  
**practicable** [5] - 84:19, 103:15, 103:24, 191:15, 211:19  
**practical** [1] - 197:29  
**practice** [8] - 7:14, 19:13, 100:18, 138:28, 198:2, 209:27, 210:6, 210:8  
**pre** [2] - 15:19, 224:19  
**pre-dealt** [1] - 15:19  
**pre-prepared** [1] - 224:19  
**precise** [2] - 196:8, 225:2  
**pregnancy** [1] - 220:21  
**premises** [2] - 162:24, 167:6  
**preoccupied** [3] - 154:3, 154:11, 157:5  
**prepare** [5] - 120:2, 134:28, 206:10, 206:11, 216:25  
**prepared** [4] - 118:11, 118:17, 206:8, 224:19  
**prescribed** [3] - 13:4, 68:16, 68:19  
**presence** [2] - 53:9, 155:15  
**present** [9] - 9:5, 22:15, 31:2, 50:13, 52:14, 121:14, 155:19, 174:16  
**presented** [2] - 20:12, 206:9  
**preserve** [2] - 82:27, 83:1  
**preserved** [1] - 82:26  
**preserving** [1] - 100:17  
**pressure** [7] - 156:1, 173:24, 185:5, 185:18, 222:29, 225:24, 226:5  
**presumably** [2] - 110:17, 159:20  
**presume** [7] - 12:24, 12:26, 20:14, 83:9, 203:12, 206:8, 211:14  
**pretty** [1] - 124:15  
**prevent** [3] - 111:12, 184:21, 189:13  
**prevention** [3] - 88:16, 116:23, 135:19  
**prevents** [1] - 100:15  
**previous** [8] - 7:26, 62:25, 153:9, 157:7, 159:20, 166:28, 202:28, 213:28  
**previously** [3] - 36:27, 148:17, 185:3  
**priest** [1] - 226:17  
**primary** [4] - 23:18, 25:17, 26:4, 41:18  
**principle** [2] - 66:24, 100:18  
**private** [1] - 91:25  
**problem** [2] - 159:6, 218:17  
**procedure** [3] - 79:2, 79:24, 147:14  
**procedures** [1] - 136:14  
**proceed** [13] - 92:26, 92:27, 98:18, 104:19, 109:10, 112:1, 112:7, 159:3, 190:10, 190:15, 190:25, 191:3, 222:7  
**proceedings** [10] - 10:3, 189:14, 189:26, 190:1, 191:1, 199:26, 212:9, 213:17, 213:19, 213:27  
**process** [15] - 133:26, 134:11, 134:12, 184:9, 184:17, 184:21, 186:7, 187:6, 190:8, 198:21, 207:17, 207:19, 208:26, 211:20, 212:4  
**processed** [4] - 78:20, 83:10, 103:25, 103:28  
**processes** [1] - 195:6  
**processing** [2] - 14:21, 31:17  
**produced** [4] - 196:10, 196:15, 196:17, 196:18  
**profile** [1] - 95:7  
**progress** [2] - 111:3, 191:28  
**promoted** [10] - 32:17, 32:22, 33:1, 70:25, 116:13, 165:2, 165:10, 177:8, 177:15, 177:20  
**prompt** [1] - 127:17  
**prompted** [1] - 190:4  
**proof** [1] - 87:21  
**proofread** [1] - 107:28  
**proofs** [2] - 69:19, 97:20  
**proper** [3] - 60:15, 138:27, 218:11  
**properly** [2] - 56:10, 68:21  
**property** [5] - 73:23, 88:12, 99:26, 119:6, 135:26  
**proposal** [2] - 48:25, 221:3  
**propose** [2] - 216:11, 217:4  
**prose** [1] - 224:25  
**prosecute** [1] - 185:1  
**prosecuted** [1] - 35:1  
**prosecutions** [1] - 100:6  
**Protected** [1] - 55:10  
**PROTECTED** [2] - 1:3, 1:4  
**protection** [3] - 73:23, 88:11, 99:26  
**protections** [1] - 161:13  
**protocols** [1] - 133:26  
**prove** [2] - 87:15, 87:22  
**provide** [5] - 14:4, 23:29, 29:6, 52:28, 197:28  
**provided** [10] - 34:17, 58:20, 63:7, 66:20, 80:29, 99:14, 187:8, 187:9, 212:18  
**provides** [3] - 13:17, 81:20, 81:21  
**providing** [1] - 92:14  
**provision** [2] - 70:22, 104:29  
**provisions** [1] - 11:20  
**psychiatric** [1] - 125:16  
**psychological** [18] - 45:9, 59:20, 73:29, 75:24, 76:2, 85:18, 86:4, 87:25, 87:28, 88:25, 95:23, 96:14, 97:8, 98:29, 99:10, 99:17, 112:17, 114:23  
**psychological-harm** [1] - 95:23  
**pub** [1] - 167:23  
**public** [18] - 26:6, 48:17, 65:26, 71:28, 79:15, 91:6, 93:6, 93:10, 95:3, 95:7, 106:20, 106:29, 107:1, 108:17, 109:17, 111:13, 111:26, 136:5  
**public"** [1] - 106:14  
**public-interest** [1] - 95:7  
**pull** [2] - 27:16, 139:14  
**pulled** [1] - 204:29  
**Pulse** [11] - 26:23, 44:4, 44:5, 178:14, 181:8, 181:11, 207:23, 219:2, 219:10, 219:13, 219:15  
**punishment** [1] - 72:23  
**purpose** [14] - 23:29, 34:13, 34:15, 42:19, 50:17, 52:11, 52:12, 63:12, 84:15, 163:8, 168:26, 198:4, 200:27, 218:18  
**purpose-built** [1] - 163:8  
**purposes** [5] - 9:2, 9:3, 52:2, 67:25, 225:12  
**pursuant** [5] - 76:24, 89:24, 180:4, 187:15, 218:11  
**pursue** [2] - 102:23, 218:18  
**pursuing** [4] - 62:16, 62:27, 63:25, 63:26  
**put** [70] - 23:14, 23:15, 24:9, 25:17, 25:18, 26:12, 26:14, 26:20, 26:22, 27:6, 29:11, 38:19, 45:28, 46:3, 53:2, 58:10, 61:14, 61:19, 62:4, 66:24, 69:18, 82:3, 96:6, 96:18, 97:20, 103:26, 106:3, 106:6, 108:11, 113:15, 119:28, 122:9, 133:26, 136:10, 140:8, 140:16, 142:22, 146:16, 149:17, 151:9, 156:6, 169:6, 170:15, 171:8, 173:24, 182:2, 185:5, 189:8, 189:13, 189:29, 190:10, 190:13, 192:20, 195:7, 200:4, 201:15, 202:10, 202:22, 218:27, 220:1, 220:15, 221:4, 221:10, 222:29, 223:3, 223:23, 224:24, 225:17, 226:5  
**putting** [6] - 45:10, 140:5, 140:21, 141:9,

167:4, 167:6  
**pyjamas** [1] - 220:28

---

## Q

---

**qualify** [2] - 114:17, 139:10  
**qualifying** [2] - 128:29, 130:22  
**quality** [1] - 117:25  
**quarter** [1] - 115:19  
**quarters** [1] - 157:2  
**QUAY** [1] - 2:21  
**queried** [4] - 27:29, 74:29, 114:21, 189:28  
**query** [8] - 28:4, 28:13, 69:1, 85:16, 89:4, 152:20, 190:2, 190:5  
**querying** [1] - 75:7  
**QUESTIONED** [10] - 4:7, 4:17, 4:25, 4:31, 5:10, 31:9, 62:11, 110:6, 159:14, 214:11  
**questioning** [2] - 69:25, 201:29  
**questions** [39] - 30:20, 40:22, 50:23, 50:24, 56:26, 62:9, 63:18, 81:9, 81:13, 85:9, 100:25, 100:26, 100:27, 101:2, 107:12, 133:16, 148:3, 148:6, 148:7, 148:11, 158:21, 158:22, 159:10, 159:11, 159:12, 170:5, 175:25, 175:27, 192:28, 200:4, 200:29, 210:29, 211:2, 211:3, 211:4, 211:5, 212:14, 213:1, 214:13  
**quick** [3] - 114:9, 148:10, 161:14  
**quickly** [4] - 82:29, 83:22, 141:24, 210:27  
**Quinn** [6] - 123:15, 125:18, 125:20, 131:26, 133:12, 157:22  
**QUINN** [1] - 2:20  
**quite** [13] - 9:28, 66:7, 66:23, 69:6, 87:5, 87:12, 96:4, 105:3, 119:13, 183:27, 191:13, 206:5, 224:21  
**quotation** [3] -

120:18, 123:5, 130:1  
**quote** [2] - 61:19, 163:28  
**quoted** [1] - 56:28  
**quoting** [1] - 120:23

---

## R

---

**raise** [2] - 61:4, 207:2  
**raised** [5] - 61:2, 72:7, 79:11, 90:4, 201:1  
**randomly** [1] - 92:10  
**rang** [17] - 71:11, 98:24, 132:4, 136:26, 137:8, 141:17, 144:7, 145:8, 145:10, 145:12, 157:22, 166:14, 167:19, 173:2, 173:20, 195:11, 195:13  
**range** [2] - 66:7, 101:19  
**rank** [13] - 32:17, 32:22, 33:1, 98:1, 116:14, 165:2, 165:11, 170:19, 170:25, 170:27, 177:8, 177:15, 177:21  
**rather** [8] - 20:5, 25:28, 35:3, 69:24, 88:19, 105:13, 192:14, 196:8  
**Rathmines** [1] - 162:18  
**rationale** [9] - 28:16, 69:23, 78:9, 85:18, 89:6, 96:12, 97:3, 208:3, 211:20  
**rationalise** [1] - 184:14  
**Ray** [3] - 71:23, 108:28, 113:26  
**re** [4] - 35:16, 71:27, 76:1, 193:21  
**RE** [6] - 4:12, 4:24, 5:4, 51:1, 107:9, 175:29  
**Re** [1] - 118:24  
**re-confirmed** [1] - 76:1  
**RE-EXAMINED** [6] - 4:12, 4:24, 5:4, 51:1, 107:9, 175:29  
**reach** [1] - 170:18  
**read** [20] - 9:11, 43:22, 46:5, 57:8, 61:19, 84:5, 102:11,

107:22, 127:6, 128:27, 159:16, 159:20, 159:21, 202:4, 202:13, 202:14, 205:9, 214:17, 214:27  
**readily** [1] - 95:6  
**reading** [6] - 15:29, 22:16, 41:16, 184:2, 184:3, 214:14  
**reads** [1] - 75:20  
**real** [2] - 138:24, 210:22  
**realistically** [1] - 194:6  
**reality** [2] - 188:7, 212:1  
**really** [18] - 60:8, 111:7, 111:8, 122:21, 140:5, 142:16, 145:15, 154:17, 155:7, 160:9, 161:11, 162:7, 162:11, 188:8, 192:12, 192:14, 211:21, 211:22  
**reason** [15] - 44:26, 45:25, 59:3, 69:23, 80:27, 96:6, 97:27, 99:23, 103:17, 112:10, 145:23, 146:11, 147:9, 174:12, 200:10  
**reason"** [1] - 122:1  
**reasonable** [4] - 69:6, 186:8, 200:19, 211:18  
**reasonableness** [1] - 213:14  
**reasonably** [4] - 31:23, 103:14, 103:24, 197:29  
**reasons** [7] - 46:13, 58:29, 61:3, 96:13, 102:27, 103:19, 104:20  
**reassigned** [1] - 54:12  
**rebutting** [1] - 141:11  
**receipt** [17] - 14:4, 14:5, 65:12, 66:10, 74:7, 74:22, 79:10, 82:6, 85:9, 89:25, 90:11, 90:19, 108:21, 109:8, 187:7, 197:23, 197:25  
**receive** [11] - 14:28, 43:14, 49:24, 58:8, 79:25, 82:12, 83:28, 86:23, 110:13, 137:2,

195:28  
**received** [51] - 12:27, 14:13, 18:1, 19:18, 19:19, 28:6, 33:13, 33:18, 34:4, 35:7, 35:17, 37:10, 41:15, 43:3, 45:26, 47:10, 54:11, 54:22, 58:15, 71:12, 71:23, 72:22, 78:17, 78:28, 79:26, 86:3, 90:5, 91:8, 95:20, 101:19, 101:21, 114:13, 116:26, 117:29, 123:15, 157:26, 166:8, 168:20, 168:21, 174:2, 185:10, 191:21, 194:11, 194:12, 194:14, 204:5, 206:24, 207:5, 208:3, 208:5, 211:28  
**receives** [2] - 13:27, 93:13  
**receiving** [9] - 34:23, 85:24, 110:11, 150:23, 150:24, 159:25, 189:10, 211:23, 212:26  
**recently** [1] - 95:2  
**receptionist** [3] - 47:12, 172:24  
**recipient** [3] - 81:6, 207:19, 212:4  
**Recipient** [5] - 184:9, 184:16, 186:7, 194:22, 200:14  
**recites** [1] - 81:8  
**recollection** [29] - 9:3, 9:5, 22:14, 38:12, 43:17, 43:19, 47:8, 47:19, 53:18, 53:20, 53:21, 118:16, 120:25, 122:20, 127:25, 132:17, 140:20, 140:22, 141:9, 142:24, 145:18, 145:19, 145:20, 146:5, 174:18, 174:19, 175:1, 175:4, 194:18  
**recommendation** [1] - 84:18  
**recommendations** [2] - 133:25, 134:29  
**recommending** [2] - 48:20, 84:16  
**record** [19] - 11:14, 14:3, 14:8, 19:14, 19:20, 44:4, 44:5,

45:27, 46:9, 52:11, 75:7, 76:20, 77:18, 102:27, 108:5, 123:9, 195:4, 197:8  
**recorded** [17] - 15:10, 24:16, 52:19, 52:20, 71:18, 113:26, 114:12, 124:3, 140:18, 149:2, 156:9, 193:12, 194:17, 206:21, 208:6, 208:13, 208:14  
**recording** [2] - 194:6, 194:13  
**records** [5] - 19:7, 140:9, 196:9, 196:15, 196:18  
**recovery** [1] - 83:4  
**REDDY** [1] - 2:29  
**refer** [30] - 23:27, 24:26, 35:19, 35:20, 35:27, 66:2, 66:16, 66:25, 67:21, 68:13, 68:29, 70:9, 70:28, 71:14, 77:13, 78:21, 78:23, 86:28, 91:3, 91:23, 93:22, 95:16, 96:22, 103:7, 144:29, 154:27, 193:18, 196:20, 209:22  
**Reference** [1] - 200:3  
**reference** [22] - 121:8, 124:8, 124:9, 124:14, 127:9, 127:13, 128:3, 128:8, 128:14, 128:25, 129:12, 129:14, 129:19, 130:3, 130:11, 130:16, 131:17, 131:21, 131:24, 152:26, 199:12, 199:14  
**referencing** [1] - 93:2  
**referral** [158] - 8:3, 8:19, 8:28, 9:1, 10:4, 12:6, 12:29, 15:26, 16:6, 22:5, 25:2, 26:10, 27:14, 27:18, 28:4, 28:11, 28:16, 38:3, 38:6, 44:14, 44:20, 45:13, 53:23, 53:27, 53:29, 54:3, 54:4, 54:23, 54:24, 54:25, 55:24, 55:26, 55:27, 56:4, 56:15, 56:17, 57:16, 57:22, 57:24, 57:25, 58:9, 58:12, 58:16, 58:17,

58:21, 58:25, 58:28,  
59:14, 59:19, 59:22,  
59:25, 59:26, 59:27,  
61:1, 61:3, 61:18,  
62:15, 62:27, 63:3,  
66:11, 66:14, 66:27,  
68:28, 69:5, 69:20,  
70:7, 70:8, 70:10,  
70:18, 70:19, 71:7,  
71:13, 71:18, 71:27,  
72:21, 73:22, 73:29,  
74:7, 74:21, 74:23,  
75:2, 75:23, 75:26,  
76:15, 76:17, 76:24,  
77:13, 78:3, 78:13,  
78:26, 79:5, 79:6,  
80:22, 83:24, 84:26,  
85:6, 85:10, 85:18,  
87:20, 87:24, 88:7,  
88:8, 88:24, 88:29,  
89:4, 95:24, 96:13,  
96:15, 97:5, 97:7,  
98:3, 98:5, 98:10,  
99:10, 99:16, 100:7,  
101:27, 102:3, 102:4,  
102:8, 102:21,  
102:25, 103:5, 103:6,  
103:16, 104:9,  
104:10, 104:27,  
105:2, 107:14,  
107:17, 108:7,  
108:12, 108:20,  
109:16, 112:9,  
112:23, 112:24,  
113:3, 113:4, 113:21,  
113:28, 114:19,  
115:10, 115:12,  
152:27, 170:3, 180:2,  
182:28, 204:20,  
224:14  
**referrals** [36] - 8:6,  
10:21, 11:2, 11:7,  
11:14, 12:11, 22:9,  
38:18, 38:22, 38:26,  
45:18, 57:23, 57:27,  
59:24, 65:12, 65:17,  
65:20, 66:8, 66:10,  
70:2, 70:27, 78:19,  
81:7, 92:13, 97:12,  
98:29, 99:18, 99:21,  
101:6, 101:7, 101:8,  
101:20, 101:21,  
101:23, 115:7, 223:16  
**referred** [39] - 12:12,  
20:22, 28:2, 51:10,  
54:7, 56:1, 57:15,  
59:3, 63:5, 65:28,  
66:1, 66:6, 68:12,  
68:18, 68:22, 75:28,  
79:25, 80:6, 85:13,  
89:8, 90:18, 94:8,

96:7, 97:19, 100:19,  
102:15, 103:9, 104:1,  
111:11, 114:22,  
121:9, 153:23,  
163:23, 170:25,  
186:1, 186:18, 219:28  
**referring** [12] - 13:1,  
67:24, 67:26, 67:27,  
86:19, 87:21, 106:12,  
113:21, 114:1,  
124:15, 180:16,  
209:20  
**refers** [5] - 58:21,  
126:8, 145:1, 170:23,  
197:24  
**reflection** [1] -  
194:18  
**reflects** [1] - 184:26  
**refuge** [3] - 162:17,  
162:22, 163:6  
**refuse** [3] - 70:1,  
102:14, 111:15  
**refused** [1] - 218:8  
**regard** [5] - 90:24,  
148:13, 152:20,  
179:27, 225:12  
**regarded** [2] -  
109:15, 200:6  
**regarding** [3] -  
38:14, 61:3, 174:21  
**regardless** [2] - 97:5,  
135:16  
**region** [2] - 32:27,  
177:19  
**Region** [1] - 113:24  
**regional** [5] - 32:26,  
32:28, 167:7, 177:18,  
206:29  
**register** [3] - 19:15,  
19:17, 108:10  
**registrar** [1] - 53:2  
**REGISTRAR** [1] - 2:4  
**registration** [1] -  
219:5  
**regret** [1] - 202:23  
**regular** [1] - 125:24  
**regulation** [2] -  
177:28, 187:16  
**regulations** [8] -  
49:21, 188:26,  
188:27, 191:14,  
193:27, 197:17,  
197:26, 197:27  
**Regulations** [1] -  
177:29  
**reject** [2] - 62:7,  
69:29  
**rejected** [2] - 11:3,  
11:17  
**rekindled** [1] -

202:21  
**relate** [2] - 74:4,  
153:5  
**related** [12] - 33:17,  
64:6, 67:16, 73:4,  
79:15, 153:3, 162:16,  
204:14, 204:18,  
205:13  
**relates** [7] - 74:6,  
75:26, 81:28, 108:24,  
171:1, 180:29, 181:16  
**relating** [6] - 6:15,  
6:16, 7:22, 28:7,  
126:6, 189:9  
**relation** [25] - 6:20,  
8:3, 8:6, 8:12, 8:18,  
9:13, 9:17, 11:19,  
12:1, 13:3, 15:21,  
16:9, 16:15, 18:15,  
18:16, 18:25, 19:18,  
20:16, 21:23, 21:29,  
22:2, 22:5, 22:9,  
22:14, 22:18, 23:20,  
23:24, 24:14, 24:16,  
25:9, 26:3, 26:17,  
27:22, 28:12, 29:16,  
29:19, 34:20, 34:26,  
35:1, 36:5, 36:9,  
36:22, 36:24, 36:25,  
36:26, 37:7, 37:10,  
37:28, 38:1, 38:3,  
38:6, 38:18, 38:20,  
38:23, 38:25, 38:29,  
39:9, 39:13, 39:14,  
39:17, 39:29, 40:2,  
41:18, 42:7, 42:12,  
42:17, 42:26, 42:27,  
42:29, 43:7, 43:8,  
43:9, 43:12, 43:20,  
44:29, 45:3, 45:7,  
45:16, 45:26, 46:4,  
46:11, 46:17, 47:6,  
47:9, 48:7, 49:8,  
49:20, 49:24, 50:2,  
50:5, 50:18, 51:10,  
53:25, 54:23, 55:16,  
55:19, 55:23, 56:26,  
58:2, 58:10, 59:5,  
59:7, 59:29, 60:2,  
60:5, 60:23, 60:24,  
60:26, 61:2, 61:9,  
61:13, 62:16, 63:5,  
64:8, 80:20, 81:19,  
83:12, 83:19, 83:22,  
86:20, 87:13, 87:16,  
89:28, 93:11, 94:6,  
94:13, 95:11, 98:27,  
99:18, 100:2, 100:3,  
103:29, 105:6, 106:2,  
106:29, 107:1,

109:17, 110:8,  
117:12, 118:12,  
120:25, 121:19,  
124:7, 125:1, 125:8,  
125:11, 125:13,  
126:23, 128:9,  
130:29, 132:12,  
134:6, 135:9, 135:21,  
136:3, 136:29, 138:6,  
138:14, 139:1, 139:4,  
140:2, 140:8, 140:14,  
140:22, 141:10,  
142:26, 144:25,  
144:28, 146:7,  
146:27, 147:12,  
147:24, 147:27,  
160:26, 162:1, 166:7,  
166:25, 167:3, 167:4,  
167:17, 168:7,  
168:23, 169:13,  
169:24, 169:29,  
170:13, 170:29,  
171:6, 171:10,  
171:16, 171:19,  
171:28, 172:9,  
172:16, 173:25,  
176:4, 177:29,  
180:10, 180:23,  
180:26, 181:9,  
181:14, 181:27,  
187:27, 188:2,  
190:14, 191:1, 191:3,  
191:14, 192:25,  
193:5, 193:6, 193:7,  
193:15, 193:20,  
194:8, 194:27, 195:3,  
196:1, 196:15, 200:5,  
201:6, 201:7, 202:2,  
202:24, 203:28,  
203:29, 204:2,  
204:24, 206:20,  
206:24, 208:27,  
215:6, 216:11, 217:7,  
218:26, 218:28,  
219:4, 219:10,  
219:20, 221:9, 222:1,  
222:18, 223:8,  
223:10, 224:8,  
226:12, 226:25,  
226:26  
**relations** [1] - 116:23  
**relationship** [20] -  
72:5, 122:3, 125:3,  
125:6, 125:22, 130:9,  
132:12, 139:19,  
157:6, 161:4, 162:10,  
178:12, 188:4, 188:5,  
188:6, 188:9, 202:16,  
202:20, 202:21,  
217:19  
**relationships** [1] -

48:17  
**relative** [1] - 207:20  
**relayed** [2] - 151:7,  
151:8  
**relaying** [1] - 154:15  
**relevance** [3] - 51:7,  
77:28, 139:22  
**relevant** [26] - 8:13,  
9:13, 40:28, 46:20,  
46:27, 51:4, 60:14,  
68:21, 82:25, 126:24,  
139:20, 139:25,  
145:29, 147:5,  
178:24, 178:26,  
180:14, 188:14,  
193:8, 199:25, 200:3,  
201:6, 210:16,  
220:18, 220:29, 221:6  
**relied** [3] - 222:16,  
223:11, 225:19  
**rely** [2] - 53:28,  
214:29  
**relying** [1] - 214:28  
**remain** [3] - 33:8,  
40:18, 177:24  
**remained** [11] -  
103:22, 116:13,  
116:16, 116:18,  
116:24, 164:28,  
165:1, 165:4, 165:6,  
177:10, 177:19  
**remark** [1] - 150:5  
**remarkable** [1] - 21:4  
**remember** [11] -  
9:21, 9:27, 22:21,  
37:1, 37:11, 37:21,  
38:3, 146:26, 157:20,  
169:11, 169:26  
**remind** [2] - 22:22,  
100:9  
**reminder** [1] - 192:8  
**reminders** [5] -  
191:22, 192:13,  
192:23, 206:24, 207:5  
**remit** [2] - 42:15,  
67:1  
**remote** [2] - 86:1,  
89:19  
**removing** [1] - 35:28  
**rendered** [1] -  
101:16  
**renewed** [1] - 167:2  
**rental** [1] - 140:2  
**Rental** [1] - 125:10  
**rented** [3] - 118:26,  
132:29, 162:10  
**renting** [1] - 135:26  
**repeat** [4] - 58:27,  
78:22, 101:25, 149:1  
**repeated** [2] -

166:28, 166:29  
**repeating** [1] - 70:10  
**replaced** [1] - 64:14  
**replicates** [1] - 187:25  
**replied** [9] - 49:6, 121:4, 121:12, 121:29, 128:23, 137:18, 164:7, 164:9, 190:24  
**replies** [1] - 27:13  
**reply** [7] - 17:21, 18:9, 29:29, 48:23, 156:19, 206:25, 223:27  
**report** [93] - 8:9, 23:8, 23:29, 24:26, 25:8, 25:13, 26:17, 26:21, 28:2, 28:24, 29:11, 34:4, 34:9, 34:14, 34:23, 35:7, 35:10, 35:14, 35:19, 35:21, 36:9, 39:14, 41:22, 42:16, 42:17, 45:13, 45:26, 47:10, 47:17, 48:9, 48:10, 48:19, 48:23, 80:19, 80:22, 80:24, 80:26, 81:1, 84:18, 86:23, 109:12, 118:11, 118:14, 118:17, 118:23, 119:29, 120:2, 120:26, 122:10, 128:18, 130:12, 134:16, 134:28, 135:10, 135:12, 136:1, 137:4, 139:16, 141:15, 141:20, 142:10, 142:14, 142:28, 145:28, 146:6, 146:8, 146:25, 146:28, 147:2, 147:4, 147:13, 148:26, 154:27, 155:1, 163:29, 167:12, 171:19, 173:14, 173:27, 174:1, 176:7, 179:21, 180:8, 180:19, 180:23, 191:28, 195:4, 203:15, 221:25, 222:7  
**reported** [8] - 80:28, 111:14, 141:16, 171:22, 182:18, 183:9, 196:1, 221:3  
**reportedly** [1] - 186:7  
**reporting** [2] - 41:19, 203:15

**reports** [19] - 25:6, 25:10, 33:13, 33:17, 33:25, 33:27, 41:15, 43:3, 81:6, 81:11, 137:2, 180:26, 180:28, 181:3, 181:20, 202:25, 204:3  
**represent** [2] - 74:11, 148:11  
**represents** [1] - 107:16  
**Republican** [1] - 37:4  
**request** [8] - 8:11, 17:23, 54:19, 54:21, 96:11, 117:17, 136:22, 179:23  
**requested** [2] - 54:18, 187:7  
**requesting** [1] - 114:2  
**requests** [1] - 35:23  
**require** [3] - 68:10, 71:9, 197:27  
**required** [6] - 80:28, 88:29, 101:14, 117:11, 186:10, 197:23  
**requirement** [6] - 94:13, 94:16, 94:19, 94:27, 94:29, 197:16  
**requires** [3] - 80:21, 82:3, 136:9  
**requisition** [1] - 136:11  
**resided** [1] - 131:5  
**Residence** [1] - 119:5  
**residence** [3] - 119:5, 134:20, 136:2  
**residing** [1] - 125:19  
**RESOLUTIONS** [1] - 1:5  
**resolve** [6] - 219:14, 219:24, 221:29, 226:8, 227:3, 227:8  
**resolved** [1] - 221:1  
**resources** [1] - 41:12  
**respect** [8] - 9:14, 10:29, 17:10, 44:8, 50:3, 68:28, 82:6, 83:25  
**respond** [2] - 73:20, 114:4  
**response** [8] - 27:26, 52:29, 60:16, 82:11, 82:19, 89:17, 141:5, 207:7  
**responsibilities** [1] - 67:1

**responsibility** [5] - 96:21, 165:19, 191:18, 192:15, 211:17  
**responsible** [2] - 33:10, 41:9  
**rest** [2] - 183:26, 196:3  
**restricted** [1] - 136:4  
**rests** [1] - 96:22  
**result** [12] - 41:8, 65:21, 65:23, 84:8, 109:5, 118:15, 128:15, 136:19, 136:21, 136:22, 140:29, 181:8  
**resulted** [2] - 84:29, 219:7  
**resumed** [1] - 188:9  
**RESUMED** [2] - 6:1, 116:1  
**retain** [1] - 168:23  
**retired** [4] - 7:25, 110:15, 110:21, 125:22  
**retract** [7] - 127:21, 127:26, 128:5, 140:13, 141:12, 152:23, 152:24  
**retracted** [1] - 152:15  
**retraction** [2] - 128:9, 140:15  
**retrospect** [2] - 21:9, 45:15  
**return** [3] - 120:24, 187:9, 220:16  
**returned** [2] - 77:8, 177:17  
**reverse** [1] - 70:19  
**reverted** [1] - 17:20  
**review** [8] - 73:18, 74:24, 189:5, 199:26, 212:8, 213:17, 213:19, 213:27  
**reviewed** [1] - 54:27  
**revisited** [1] - 157:29  
**revived** [1] - 225:11  
**revoke** [1] - 71:7  
**right-hand** [1] - 128:24  
**ring** [9] - 19:3, 19:4, 98:4, 113:17, 137:15, 144:2, 161:16, 165:27, 172:3  
**ringing** [3] - 145:15, 145:19, 145:20  
**rings** [4] - 70:8, 82:21, 224:12, 225:22  
**rise** [2] - 150:29,

215:25  
**risk** [5] - 19:26, 26:5, 73:25, 86:8, 102:20  
**risks** [2] - 119:9, 119:10  
**Rita** [20] - 24:26, 25:10, 33:18, 41:15, 72:17, 72:18, 80:13, 80:14, 96:11, 107:27, 172:2, 173:25, 179:18, 180:23, 220:3, 220:27, 221:13, 221:20, 222:9, 222:13  
**RITA** [1] - 3:11  
**road** [1] - 160:12  
**robust** [1] - 163:1  
**rock** [1] - 209:12  
**role** [7] - 33:23, 91:24, 98:1, 102:2, 102:3, 116:22, 162:7  
**room** [13] - 10:14, 20:29, 21:1, 48:26, 49:1, 118:19, 124:1, 150:5, 155:15, 161:21, 164:3, 166:11, 166:24  
**Roscommon** [1] - 155:8  
**roster** [3] - 196:12, 197:11, 197:12  
**roughly** [3] - 196:2, 205:4, 205:8  
**rounded** [1] - 114:15  
**routine** [3] - 132:24, 133:4, 146:10  
**row** [3] - 54:6, 59:2, 199:1  
**RTA** [1] - 72:29  
**RTC** [1] - 73:1  
**rubric** [1] - 111:6  
**rule** [1] - 113:4  
**run** [1] - 217:15  
**rung** [4] - 70:27, 71:5, 113:17, 123:25  
**runs** [1] - 117:27

## S

**safety** [15] - 19:29, 20:5, 21:11, 26:26, 119:21, 127:6, 127:7, 127:10, 133:21, 138:6, 138:9, 150:11, 156:16, 156:24, 161:10  
**said** [1] - 215:13  
**sake** [1] - 48:21  
**SARAH** [1] - 2:16

**sat** [2] - 154:5, 157:17  
**satisfied** [9] - 68:26, 87:24, 87:27, 87:28, 102:29, 105:14, 106:28, 140:14, 200:25  
**satisfies** [1] - 111:29  
**satisfy** [3] - 51:8, 92:18, 190:14  
**Saturday** [6] - 73:5, 73:7, 73:8, 129:13, 131:19, 131:22  
**saw** [4] - 64:7, 108:15, 169:18, 226:7  
**say** [1] - 128:7  
**SC** [11] - 2:6, 2:6, 2:9, 2:9, 2:10, 2:15, 2:19, 2:23, 2:28, 3:3, 3:7  
**scale** [1] - 210:19  
**scenarios** [1] - 91:7  
**scene** [2] - 83:2, 83:3  
**scenes** [1] - 82:24  
**scheduled** [1] - 215:21  
**school** [1] - 86:2  
**Scotland** [1] - 138:12  
**screen** [8] - 35:15, 68:5, 107:22, 118:14, 123:19, 133:14, 146:9, 186:4  
**screens** [1] - 118:18  
**SEANAD** [1] - 1:6  
**search** [1] - 40:16  
**searching** [1] - 219:1  
**seat** [1] - 48:4  
**second** [12] - 13:5, 35:7, 53:3, 113:11, 127:8, 136:21, 143:23, 153:17, 160:24, 166:24, 171:13, 179:17  
**secondary** [2] - 23:18, 26:4  
**secondly** [1] - 178:12  
**section** [1] - 134:24  
**section** [154] - 8:3, 8:18, 8:28, 10:6, 10:8, 10:29, 11:2, 11:19, 11:20, 11:22, 12:1, 12:5, 12:7, 12:10, 12:11, 12:24, 12:26, 12:29, 13:6, 13:17, 13:21, 13:24, 14:20, 14:22, 14:28, 14:29, 15:5, 15:10, 15:26, 16:4, 22:19, 22:21, 22:23, 25:2, 25:29,

26:9, 27:13, 27:18, 27:29, 28:4, 28:11, 38:8, 38:18, 38:20, 44:8, 44:13, 44:20, 44:29, 45:13, 45:18, 52:3, 53:23, 56:1, 56:2, 56:6, 56:10, 58:3, 58:5, 58:6, 58:8, 58:29, 59:17, 61:17, 65:12, 65:15, 66:3, 67:16, 68:22, 72:20, 73:28, 74:24, 74:26, 75:1, 75:3, 75:8, 75:23, 76:4, 76:11, 76:16, 76:24, 78:2, 80:24, 81:19, 81:24, 82:10, 82:14, 83:6, 83:7, 83:24, 83:26, 83:29, 84:2, 84:17, 84:21, 84:24, 86:28, 87:26, 88:24, 88:29, 89:25, 90:9, 90:28, 90:29, 91:1, 91:3, 91:5, 91:10, 92:22, 93:2, 94:11, 94:18, 95:5, 95:11, 97:12, 98:27, 98:29, 99:18, 99:20, 100:5, 101:6, 101:7, 101:8, 101:22, 101:23, 102:5, 102:20, 104:21, 105:12, 106:3, 106:11, 108:12, 109:15, 111:9, 112:3, 112:4, 112:5, 112:15, 112:18, 112:19, 114:18, 180:4, 187:8, 208:8

**Section** [6] - 13:27, 90:25, 91:13, 103:8, 103:10, 110:24

**sections** [3] - 9:23, 26:3, 68:21

**secure** [1] - 83:1

**securing** [1] - 100:17

**security** [14] - 117:18, 117:23, 117:24, 117:25, 119:9, 125:1, 134:6, 136:10, 162:25, 162:26, 167:4, 167:6, 168:1, 169:6

**see** [38] - 13:17, 19:23, 27:22, 40:16, 42:10, 51:4, 51:6, 59:6, 67:11, 67:13, 68:2, 68:5, 75:14, 85:5, 85:28, 93:20, 98:17, 106:10, 120:15, 124:3, 128:25, 129:2, 129:10, 129:16, 130:25, 131:10, 134:20, 141:28, 143:24, 152:6, 154:27, 157:14, 189:16, 200:1, 205:1, 205:29, 206:25, 208:2

**seeing** [2] - 49:28, 92:11

**seek** [2] - 150:11, 192:20

**seeking** [5] - 119:21, 125:21, 151:28, 189:12, 192:18

**seem** [7] - 85:13, 98:13, 155:4, 156:8, 160:14, 218:16, 227:6

**seemingly** [1] - 96:12

**selected** [2] - 202:16, 202:18

**self** [2] - 31:18, 31:20

**self-taught** [2] - 31:18, 31:20

**semi** [1] - 163:7

**semi-detached** [1] - 163:7

**send** [19] - 8:11, 13:14, 27:5, 28:14, 28:24, 29:4, 39:20, 59:17, 73:17, 77:21, 92:10, 108:12, 134:29, 142:10, 142:11, 142:13, 144:3, 173:4, 186:17

**sending** [8] - 21:22, 28:16, 147:9, 166:15, 173:7, 181:29, 198:12

**senior** [6] - 51:28, 53:7, 58:4, 58:7, 65:10, 175:11

**sense** [5] - 31:2, 54:5, 79:14, 144:22, 175:19

**sensitive** [2] - 182:4, 204:4

**sent** [34] - 8:29, 13:5, 13:13, 14:14, 16:4, 17:16, 27:20, 28:19, 29:12, 30:1, 39:23, 48:19, 49:12, 49:14, 49:16, 49:22, 58:5, 67:7, 104:23, 106:6, 107:17, 111:5, 118:12, 126:19, 144:25, 172:15, 186:2, 187:3, 192:10, 198:10, 203:3, 203:7, 203:25, 207:6

**sentence** [1] - 53:5

**separate** [1] - 180:8

**separated** [1] - 72:6

**separately** [1] - 178:24

**September** [17] - 32:10, 33:16, 35:12, 41:21, 41:22, 41:23, 48:9, 54:7, 59:2, 59:10, 125:5, 177:16, 221:20, 221:23, 221:26, 221:28, 222:3

**SERGEANT** [7] - 4:27, 116:6, 133:18, 148:9, 159:14, 163:21, 175:29

**Sergeant** [60] - 7:5, 26:10, 33:14, 33:18, 34:4, 34:23, 35:7, 35:10, 35:20, 35:23, 39:9, 39:11, 39:14, 43:4, 47:9, 47:10, 47:16, 47:18, 47:24, 116:27, 117:8, 117:11, 126:4, 126:14, 133:9, 133:19, 135:20, 136:18, 136:23, 137:3, 137:4, 138:19, 141:17, 143:29, 144:10, 145:19, 148:10, 148:12, 150:22, 163:14, 163:18, 164:13, 180:19, 180:22, 181:3, 183:22, 195:11, 195:12, 195:13, 195:17, 218:22, 220:10, 221:21, 221:25, 222:9, 222:12, 222:27, 223:7, 224:3, 226:11

**sergeant** [14] - 32:17, 32:18, 94:24, 116:3, 116:14, 116:17, 116:20, 132:4, 159:20, 165:3, 167:27, 177:8, 177:13, 224:29

**sergeants** [2] - 43:5, 48:13

**serious** [57] - 11:24, 11:26, 12:21, 12:22, 16:3, 16:22, 20:15, 20:22, 20:24, 53:11, 55:28, 56:6, 56:14, 57:2, 57:6, 57:18, 59:7, 59:11, 61:23, 61:27, 66:5, 66:7, 66:14, 67:14, 73:14, 75:29, 78:3, 84:3, 84:7, 85:1, 85:4, 85:8, 85:13, 85:17, 86:7, 86:9, 86:13, 86:15, 86:21, 86:25, 87:8, 87:15, 87:18, 87:23, 90:12, 93:5, 95:15, 95:26, 99:13, 101:25, 102:20, 105:19, 107:4, 109:15, 112:16, 209:28

**seriously** [6] - 138:19, 160:14, 201:27, 208:29, 210:27, 222:21

**seriousness** [4] - 12:5, 16:9, 91:25, 138:7

**serve** [2] - 200:27, 207:10

**served** [1] - 197:17

**serves** [1] - 182:21

**service** [2] - 24:21, 127:2

**SERVICES** [1] - 1:30

**Services** [1] - 1:25

**servicing** [3] - 90:19, 107:5, 110:18

**set** [6] - 99:3, 152:5, 178:8, 183:16, 186:22, 187:18

**sets** [2] - 87:12, 187:14

**several** [1] - 57:23

**severity** [1] - 135:29

**SGT** [1] - 2:28

**shall** [10] - 14:3, 14:13, 21:4, 21:12, 32:10, 44:28, 66:29, 84:10, 92:20, 138:25

**sham** [1] - 200:6

**SHANE** [1] - 2:10

**sheet** [2] - 76:27, 77:8

**Sheridan** [55] - 7:24, 8:20, 9:10, 10:19, 16:27, 17:10, 18:2, 19:23, 20:12, 21:3, 28:19, 29:22, 29:28, 30:3, 34:28, 37:20, 37:26, 39:18, 39:21, 39:23, 39:26, 39:29, 47:26, 62:16, 62:18, 62:28, 63:5, 63:6, 63:22, 63:23, 64:5, 73:15, 141:26, 141:28, 142:19, 142:23, 142:27, 143:10, 143:13, 143:25, 145:10, 145:22, 145:24, 148:11, 156:10, 156:13, 188:22, 219:9, 221:24, 222:12, 222:27, 223:1, 224:18, 224:24

**SHERIDAN** [1] - 2:27

**Sheridan's** [1] - 181:7

**SHIP** [1] - 2:13

**shooting** [1] - 72:23

**short** [5] - 28:17, 176:23, 189:10, 193:21, 217:9

**shorten** [1] - 158:4

**shorthand** [1] - 75:10

**shortly** [2] - 101:17, 194:12

**shot** [1] - 23:28

**show** [1] - 86:23

**showing** [1] - 21:4

**shuffle** [1] - 47:29

**sick** [11] - 50:9, 50:10, 72:20, 183:26, 186:13, 196:4, 197:2, 197:9, 198:16, 207:12, 220:15

**sickness** [1] - 97:28

**side** [4] - 30:27, 34:29, 118:19, 128:24

**sight** [3] - 58:11, 58:13, 58:18

**sign** [1] - 134:9

**signature** [1] - 189:21

**signed** [3] - 77:5, 147:17, 198:9

**significance** [2] - 96:18, 131:9

**significant** [1] - 75:12

**similar** [6] - 10:11, 53:19, 57:20, 90:14, 193:23, 216:15

**similarly** [3] - 140:11, 217:1, 217:3

**Simms** [144] - 9:10, 17:20, 18:22, 18:28, 19:29, 20:6, 21:5, 22:1, 24:6, 24:29, 25:10, 35:27, 36:24, 41:25, 54:28, 59:3, 60:2, 72:6, 72:25, 75:24, 80:11, 80:12, 80:15, 85:19, 85:22, 85:23, 89:26, 90:1, 90:6, 90:7, 95:26, 96:11, 97:9, 98:17,

103:26, 104:3, 104:4,  
104:11, 104:13,  
104:15, 104:17,  
104:22, 104:26,  
107:27, 109:1,  
109:20, 119:19,  
120:19, 120:23,  
121:10, 121:12,  
121:28, 122:13,  
122:16, 123:4, 123:8,  
123:11, 123:14,  
124:8, 124:17,  
124:26, 125:4, 125:7,  
128:21, 128:26,  
129:14, 129:21,  
130:13, 131:21,  
132:15, 132:18,  
137:25, 137:29,  
139:1, 139:5, 139:19,  
140:27, 141:28,  
142:19, 143:13,  
147:24, 147:28,  
148:17, 149:14,  
149:18, 150:3, 150:9,  
151:10, 151:16,  
152:10, 153:9,  
153:14, 155:6,  
156:10, 157:7,  
157:27, 158:7,  
158:25, 164:9,  
169:18, 178:11,  
178:25, 181:9,  
181:17, 181:18,  
182:13, 182:14,  
182:20, 183:10,  
184:25, 187:20,  
188:9, 188:16,  
188:18, 200:18,  
202:4, 204:17,  
204:21, 205:27,  
208:17, 208:19,  
213:7, 213:10,  
213:22, 214:4,  
214:29, 217:19,  
217:22, 217:24,  
219:19, 219:29,  
220:28, 221:4, 222:4,  
222:25, 223:14,  
223:22, 224:1, 224:7,  
224:15, 224:17  
**SIMMS** [1] - 3:3  
**Simms** [26] - 24:18,  
24:20, 24:23, 29:9,  
37:24, 53:25, 54:17,  
55:12, 60:26, 112:26,  
130:9, 131:2, 131:25,  
153:22, 156:19,  
178:13, 179:13,  
182:15, 187:21,  
188:7, 202:13,  
204:25, 205:9,  
208:23, 209:14, 219:2  
**simple** [1] - 111:15  
**simply** [10] - 14:21,  
34:8, 100:19, 142:23,  
142:26, 158:25,  
162:20, 204:29,  
212:23, 226:18  
**SIO** [1] - 108:28  
**SIO"** [1] - 89:13  
**sister** [2] - 72:7,  
72:27  
**sit** [2] - 132:25,  
215:25  
**sits** [1] - 207:18  
**sitting** [2] - 133:13,  
157:16  
**situation** [19] -  
14:23, 15:2, 20:16,  
21:5, 21:29, 27:17,  
43:16, 91:28, 93:9,  
94:3, 94:6, 99:9,  
122:21, 143:10,  
179:27, 185:20,  
202:24, 203:14,  
222:28  
**six** [9] - 21:1, 32:21,  
53:4, 132:2, 163:5,  
177:12, 195:24,  
197:14, 208:8  
**skip** [1] - 119:11  
**skipping** [1] - 225:8  
**sleep** [1] - 133:6  
**slightly** [1] - 172:14  
**SLIGO** [1] - 3:5  
**Sligo** [17] - 17:25,  
28:29, 32:28, 176:22,  
177:6, 177:13,  
177:17, 177:23,  
185:11, 193:20,  
205:5, 209:27, 210:5,  
210:8, 210:11, 224:29  
**Sligo-Leitrim** [5] -  
177:13, 209:27,  
210:5, 210:8, 210:11  
**slip** [1] - 49:16  
**small** [2] - 70:23,  
116:15  
**smoke** [1] - 219:23  
**society** [1] - 162:15  
**SOLE** [2] - 1:12, 2:2  
**SOLICITOR** [1] - 2:7  
**solicitor** [2] - 52:14,  
53:9  
**SOLICITOR'S** [1] -  
2:12  
**solicitors** [2] -  
190:16, 190:24  
**SOLICITORS** [4] -  
2:20, 2:24, 2:29, 3:4  
**someone** [7] - 82:21,  
104:17, 134:24,  
161:3, 162:9, 162:28,  
226:16  
**sometime** [1] - 99:19  
**sometimes** [5] -  
83:2, 92:13, 142:14,  
170:23, 182:3  
**somewhat** [1] -  
57:20  
**somewhere** [1] -  
135:14  
**soon** [5] - 82:24,  
84:19, 191:5, 191:15,  
197:28  
**sorry** [48] - 6:14,  
10:25, 11:15, 16:14,  
20:29, 23:6, 24:25,  
25:20, 25:25, 25:27,  
26:20, 41:23, 49:15,  
58:27, 74:10, 74:13,  
75:7, 93:7, 94:23,  
97:10, 98:9, 102:16,  
103:4, 103:29, 104:6,  
106:29, 118:18,  
128:10, 136:3,  
142:17, 143:9, 148:5,  
149:1, 156:1, 158:4,  
159:9, 163:16,  
163:18, 172:28,  
183:2, 186:29,  
196:13, 199:16,  
210:7, 211:2, 214:13,  
216:27  
**sort** [20] - 8:16, 10:1,  
15:19, 16:1, 18:28,  
19:1, 23:15, 23:17,  
26:6, 29:1, 31:18,  
103:27, 133:3,  
134:25, 135:15,  
139:24, 142:12,  
154:28, 157:22,  
162:27  
**sorted** [1] - 225:13  
**sought** [3] - 39:6,  
189:4, 218:17  
**sound** [3] - 69:3,  
98:5, 111:18  
**source** [3] - 149:18,  
150:6, 171:12  
**space** [2] - 92:21,  
197:4  
**speaking** [4] - 42:15,  
142:6, 142:29, 173:17  
**speaks** [1] - 221:21  
**special** [1] - 88:2  
**specialisation** [1] -  
169:22  
**specialist** [1] - 162:7  
**specialty** [1] -  
160:25  
**specific** [5] - 22:27,  
81:24, 120:9, 164:5,  
172:8  
**specifically** [3] -  
30:29, 93:1, 219:8  
**specifics** [1] - 22:29  
**speculate** [1] - 122:7  
**speech** [3] - 122:16,  
122:26, 130:20  
**speed** [2] - 42:26,  
169:5  
**spend** [1] - 135:27  
**spent** [4] - 32:17,  
32:21, 32:23, 32:25  
**spoken** [6] - 23:5,  
38:13, 47:11, 104:18,  
117:10, 120:14  
**SPRING** [1] - 3:8  
**SQUARE** [1] - 3:9  
**staff** [2] - 168:18,  
206:12  
**stage** [24] - 8:26,  
20:29, 25:14, 25:15,  
28:5, 29:8, 38:17,  
42:24, 44:16, 44:23,  
44:24, 45:1, 49:4,  
90:8, 96:4, 96:5,  
150:5, 157:20,  
159:21, 166:1,  
166:29, 192:13,  
207:26, 223:22  
**stain** [1] - 141:8  
**stamped** [1] - 198:24  
**stamped-**  
**addressed** [1] -  
198:24  
**stand** [4] - 22:13,  
23:3, 23:4, 100:20  
**standard** [3] - 79:2,  
79:24, 138:28  
**standing** [1] - 221:9  
**stands** [1] - 126:4  
**staple** [1] - 206:11  
**start** [3] - 9:5, 31:11,  
217:19  
**started** [9] - 23:10,  
30:12, 31:13, 37:23,  
37:24, 100:4, 155:20,  
177:17, 202:17  
**starting** [1] - 192:15  
**state** [4] - 153:1,  
153:3, 157:26, 226:12  
**STATE** [1] - 2:12  
**statement** [199] - 9:9,  
9:21, 9:26, 12:4,  
15:29, 16:27, 18:19,  
18:23, 18:27, 18:28,  
18:29, 20:15, 22:16,  
24:18, 24:20, 24:23,  
25:15, 29:9, 29:10,  
29:24, 32:2, 36:23,  
37:24, 39:4, 39:24,  
40:14, 40:16, 40:17,  
41:16, 41:17, 43:22,  
43:25, 47:25, 48:6,  
51:19, 52:12, 52:18,  
52:20, 52:26, 52:29,  
53:11, 53:25, 54:2,  
54:10, 54:17, 54:21,  
54:28, 55:12, 55:15,  
55:20, 56:4, 56:16,  
56:17, 56:28, 57:3,  
60:2, 60:6, 60:26,  
61:15, 61:24, 63:4,  
71:12, 72:16, 73:11,  
73:15, 73:16, 74:23,  
76:23, 79:10, 90:2,  
90:11, 90:14, 103:26,  
104:2, 104:10, 105:8,  
105:18, 107:4,  
107:26, 108:1,  
108:21, 108:22,  
109:16, 117:8,  
112:29, 112:8, 120:4,  
120:13, 121:6, 121:8,  
121:15, 121:21,  
123:20, 123:25,  
124:1, 124:9, 124:11,  
124:27, 126:4,  
126:14, 126:17,  
127:13, 127:26,  
128:1, 128:5, 128:9,  
128:20, 128:21,  
130:13, 130:28,  
132:16, 132:19,  
132:20, 134:16,  
137:27, 139:20,  
140:13, 140:16,  
140:26, 142:1,  
142:21, 144:26,  
144:27, 145:28,  
148:16, 149:20,  
149:22, 151:17,  
151:20, 151:22,  
151:27, 152:1, 152:9,  
152:13, 152:23,  
152:24, 152:28,  
155:14, 155:26,  
158:8, 159:19,  
163:23, 163:26,  
164:4, 164:8, 164:18,  
167:11, 169:17,  
169:18, 169:19,  
172:16, 174:22,  
176:3, 176:13,  
176:22, 176:24,  
178:25, 178:29,  
179:10, 179:14,  
179:15, 179:19,  
182:13, 182:15,  
185:2, 185:7, 185:27,

188:7, 188:21, 202:3, 202:14, 205:9, 205:14, 205:27, 206:4, 208:7, 208:15, 208:18, 208:23, 208:28, 209:5, 209:14, 213:10, 214:14, 214:20, 214:21, 214:28, 214:29, 220:17, 222:13, 222:16, 222:25, 222:28, 223:2, 224:18, 224:19, 224:20

**statement/HSE** [2] - 127:22, 141:13

**statements** [22] - 18:11, 23:27, 37:26, 53:1, 78:28, 96:10, 107:18, 107:28, 108:2, 151:24, 152:14, 152:16, 153:14, 179:14, 182:14, 183:6, 184:3, 204:20, 204:21, 213:6, 214:17

**stating** [1] - 185:12

**Station** [25] - 33:10, 34:6, 36:12, 36:16, 71:29, 116:29, 117:4, 124:11, 132:16, 146:2, 157:29, 158:14, 168:7, 172:4, 172:11, 176:22, 177:4, 177:6, 177:16, 177:17, 177:22, 177:23, 180:24, 183:23, 185:11

**station** [26] - 8:26, 12:28, 13:2, 13:21, 13:22, 14:1, 14:11, 14:12, 14:25, 15:11, 15:18, 32:12, 44:4, 49:26, 73:10, 79:15, 82:6, 93:17, 94:24, 116:12, 116:17, 123:25, 145:9, 173:2, 203:11, 223:1

**Station"** [1] - 35:18

**stationed** [1] - 33:14

**stations** [1] - 46:26

**status** [1] - 191:27

**statute** [1] - 208:16

**statutory** [11] - 69:11, 69:12, 70:21, 70:22, 71:6, 79:4, 102:3, 109:29, 111:17, 208:9, 209:26

**stay** [8] - 31:12, 161:15, 189:8, 189:13, 190:10, 190:13, 191:8, 192:21

**staying** [1] - 155:5

**stenographic** [1] - 1:27

**STENOGRAPHY** [1] - 1:30

**stenography** [1] - 1:25

**steps** [13] - 16:27, 28:11, 46:25, 64:12, 64:16, 64:18, 82:7, 100:21, 101:17, 165:29, 166:4, 223:17

**still** [20] - 16:11, 16:21, 19:25, 19:26, 22:24, 78:16, 93:22, 93:27, 100:6, 141:8, 142:25, 186:9, 186:13, 198:16, 207:12, 209:7, 209:10, 209:24, 226:4

**stood** [1] - 30:4

**stop** [6] - 78:5, 100:12, 156:24, 189:12, 224:2, 224:6

**stopped** [1] - 213:19

**stopping** [2] - 74:9, 199:28

**storm** [1] - 133:7

**Strabane** [1] - 167:24

**straight** [1] - 47:26

**straightaway** [6] - 173:20, 173:21, 184:10, 194:26, 210:15

**strain** [1] - 220:22

**strange** [11] - 55:26, 55:27, 57:16, 57:17, 57:19, 57:25, 57:26, 59:14, 59:15, 154:7

**streak** [1] - 220:24

**Streak'** [1] - 131:25

**stream** [1] - 83:19

**STREET** [4] - 2:13, 2:21, 2:25, 3:5

**Street** [3] - 32:23, 32:24, 177:16

**strength** [1] - 25:20

**stress** [2] - 185:17, 185:23

**strict** [1] - 71:6

**strictly** [1] - 42:14

**structure** [1] - 128:18

**structured** [1] - 101:5

**struggling** [1] - 107:22

**studied** [1] - 200:12

**stuff** [7] - 26:20, 112:16, 131:4, 135:25, 142:15, 163:14

**stuff** [1] - 136:27

**style** [2] - 115:1, 115:2

**subject** [7] - 45:22, 72:22, 132:24, 140:24, 140:25, 152:18, 212:27

**subject-matter** [3] - 45:22, 140:24, 140:25

**submission** [7] - 199:18, 199:20, 216:9, 216:14, 216:19, 216:24, 227:8

**submissions** [7] - 216:2, 216:3, 216:5, 216:6, 216:8, 217:4, 217:13

**submit** [1] - 50:16

**submitted** [2] - 48:9, 106:23

**subsequent** [6] - 7:21, 66:27, 68:24, 97:4, 111:17, 174:1

**subsequently** [5] - 38:25, 45:18, 167:10, 167:15, 168:6

**substance** [1] - 224:26

**substantial** [7] - 86:8, 86:9, 210:23, 210:24, 210:25, 210:26, 214:15

**substantive** [1] - 79:20

**subversive** [1] - 165:19

**succeeded** [1] - 199:27

**successful** [1] - 165:8

**sufficient** [1] - 109:14

**sufficiently** [1] - 93:5

**suggest** [7] - 49:12, 104:24, 142:20, 157:4, 202:6, 203:26, 215:25

**suggested** [3] - 41:27, 104:20, 108:6

**suggestible** [1] - 223:4

**suggesting** [3] - 12:25, 151:10, 223:25

**suggestion** [3] - 90:5, 140:28, 171:28

**suicidal** [1] - 125:19

**suited** [2] - 12:7, 132:7

**summarise** [1] - 34:8

**summarises** [1] - 179:27

**summary** [1] - 209:2

**summer** [1] - 207:23

**Sunday** [3] - 73:10, 168:10, 169:10

**SUNLIGHT** [1] - 2:25

**super** [2] - 29:4, 176:8

**SUPERINTENDANT** [2] - 211:8, 214:11

**superintendent** [2] - 41:8, 214:13

**SUPERINTENDENT** [8] - 4:9, 5:6, 5:7, 32:5, 40:25, 51:1, 176:26, 193:2

**superintendent** [99] - 6:28, 8:21, 8:26, 9:8, 10:24, 12:13, 14:18, 17:25, 21:23, 28:25, 28:28, 29:3, 29:12, 33:1, 33:9, 33:24, 33:25, 34:2, 34:3, 34:11, 34:14, 34:16, 35:11, 35:16, 36:8, 37:17, 37:18, 37:27, 38:4, 38:16, 40:6, 40:23, 40:29, 44:10, 45:29, 48:10, 48:20, 49:1, 49:13, 49:15, 49:17, 49:18, 49:25, 50:20, 51:3, 58:9, 80:6, 95:22, 95:24, 96:8, 96:26, 96:27, 96:28, 97:4, 97:5, 97:7, 98:1, 98:4, 98:15, 114:1, 114:3, 115:9, 118:13, 121:20, 126:20, 128:27, 135:1, 135:6, 138:17, 142:5, 143:4, 150:4, 155:15, 165:9, 165:12, 165:22, 170:19, 170:26, 170:27, 176:28, 177:21, 177:24, 184:19, 189:27, 190:12, 191:27, 192:18, 193:3, 203:14, 203:16, 207:3, 207:5, 211:1, 211:10, 214:5, 214:8, 226:23

**Superintendent** [145] - 7:24, 8:20, 9:4, 9:19, 10:18, 10:24, 10:25, 10:26, 11:16, 16:5, 16:7, 20:13, 20:23, 21:3, 25:7, 27:3, 27:10, 27:12, 27:21, 28:3, 28:15, 29:15, 29:17, 29:24, 32:1, 32:7, 34:28, 37:18, 38:14, 38:15, 40:27, 45:27, 49:20, 53:13, 56:18, 57:4, 61:25, 62:14, 62:17, 62:19, 62:20, 62:22, 62:26, 63:6, 63:23, 64:5, 64:13, 64:15, 64:19, 64:22, 71:13, 74:14, 75:1, 75:9, 84:28, 88:6, 88:23, 98:8, 98:11, 98:12, 99:24, 106:17, 106:18, 106:24, 107:16, 113:17, 113:18, 114:14, 117:29, 120:14, 121:14, 132:22, 137:8, 137:24, 143:1, 144:7, 145:2, 145:11, 145:12, 146:14, 164:2, 165:21, 165:25, 166:2, 167:1, 168:13, 169:2, 176:21, 177:26, 178:18, 178:21, 178:27, 179:6, 179:22, 180:3, 180:9, 181:7, 181:24, 182:7, 182:9, 183:4, 183:12, 185:11, 185:12, 186:4, 187:14, 188:19, 189:4, 189:17, 189:20, 189:23, 190:2, 190:5, 191:5, 191:22, 191:25, 192:2, 192:4, 192:9, 192:29, 193:7, 194:10, 194:15, 196:6, 196:13, 200:26, 201:25, 203:19, 203:29, 204:1, 205:3, 205:10, 205:28, 206:6, 206:26, 206:28, 207:25, 218:9, 219:9, 221:23, 222:26, 223:24, 224:2, 224:12

**superintendent's** [2] - 44:3, 168:17

**superintendents** [11] - 42:3, 48:1, 70:26, 96:29, 97:1, 97:2, 97:11, 97:17,



97:26, 97:27, 113:21  
**superior** [1] - 184:22  
**supers** [2] - 19:22, 97:16  
**superseded** [1] - 133:28  
**supervisor** [1] - 195:13  
**supplemental** [1] - 176:24  
**supplementary** [1] - 68:9  
**support** [4] - 15:25, 52:25, 125:26, 167:7  
**suppose** [30] - 19:2, 39:4, 58:2, 93:8, 110:8, 112:13, 122:7, 128:15, 133:5, 133:10, 152:6, 154:16, 161:27, 183:18, 183:28, 184:7, 185:22, 185:24, 189:12, 192:12, 195:5, 200:19, 201:15, 201:20, 207:4, 208:19, 208:20, 211:24, 215:5, 215:9  
**supposed** [3] - 18:6, 222:4, 222:6  
**SUPREME** [2] - 1:13, 2:3  
**SUPT** [1] - 2:23  
**surely** [3] - 173:16, 175:18, 195:19  
**surprised** [11] - 59:29, 60:4, 60:9, 60:11, 60:25, 60:28, 60:29, 64:10, 139:8, 172:14, 190:26  
**surprising** [1] - 146:17  
**suspect** [1] - 73:2  
**suspend** [1] - 49:9  
**suspension** [4] - 17:7, 23:16, 49:27, 223:26  
**suspicion** [1] - 86:27  
**suss** [1] - 143:16  
**sussing** [1] - 141:29  
**swap** [1] - 217:20  
**swore** [1] - 190:29  
**SWORN** [5] - 32:5, 51:22, 116:6, 164:22, 176:26  
**system** [4] - 77:24, 78:26, 80:26, 197:11  
**Síochána** [59] - 13:27, 14:11, 32:9, 32:10, 39:6, 50:6,

51:25, 54:19, 54:22, 63:17, 65:6, 65:13, 65:27, 70:17, 72:17, 73:24, 78:29, 81:25, 81:26, 84:9, 88:12, 90:11, 90:20, 91:8, 91:22, 91:24, 91:26, 92:2, 93:10, 94:27, 95:14, 99:27, 101:2, 102:2, 104:21, 106:6, 106:13, 106:21, 106:23, 106:27, 107:2, 107:6, 108:16, 111:27, 116:9, 116:10, 140:13, 164:25, 176:29, 177:2, 177:28, 180:4, 184:29, 188:10, 188:13, 188:27, 196:17, 197:16

## T

**table** [6] - 133:13, 141:7, 154:6, 157:13, 157:16, 157:17  
**talks** [1] - 92:1  
**tallies** [1] - 57:13  
**tangentially** [1] - 219:4  
**target** [5] - 133:1, 135:27, 138:14, 160:29, 162:12  
**target-harden** [4] - 133:1, 135:27, 138:14, 162:12  
**targeting** [1] - 31:3  
**tasked** [4] - 20:7, 98:10, 144:7, 162:3  
**tasks** [2] - 46:20, 144:2  
**taught** [2] - 31:18, 31:20  
**team** [1] - 217:2  
**technical** [5] - 69:14, 90:22, 97:21, 167:29, 168:5  
**TEELING** [1] - 3:5  
**telephone** [10] - 19:9, 109:1, 116:26, 117:29, 119:18, 123:29, 125:24, 149:13, 149:15, 156:6  
**telephones** [1] - 167:27  
**template** [2] - 23:15, 25:19  
**templemore** [1] - 32:11

**Templemore** [2] - 18:18, 164:26  
**TEN** [1] - 2:17  
**ten** [6] - 31:16, 69:16, 114:15, 141:22, 144:18, 195:18  
**tend** [1] - 124:10  
**tendered** [1] - 71:16  
**term** [1] - 79:6  
**Term** [1] - 200:3  
**terminated** [1] - 76:20  
**terms** [27] - 7:13, 19:13, 45:10, 67:15, 68:24, 98:28, 99:14, 133:21, 138:29, 166:16, 168:1, 168:20, 169:6, 169:19, 169:23, 171:9, 174:3, 174:22, 175:20, 175:23, 185:26, 199:12, 199:13, 202:2, 208:4, 209:24, 223:1  
**TERRACE** [1] - 2:17  
**Terry** [2] - 185:13, 218:9  
**text** [6] - 143:12, 143:23, 144:3, 144:25, 156:7, 156:9  
**texted** [2] - 141:28, 143:13  
**texting** [1] - 156:13  
**texts** [4] - 129:17, 129:19, 129:20, 220:28  
**that'** [2] - 120:16, 124:3  
**that'd** [4] - 140:1, 157:1, 157:9, 160:2  
**THE** [30] - 1:4, 1:8, 1:9, 1:12, 2:3, 2:6, 2:9, 2:21, 4:7, 4:17, 4:25, 4:31, 5:10, 6:1, 31:9, 31:27, 51:16, 62:11, 64:29, 107:9, 110:6, 115:17, 115:22, 116:1, 159:14, 164:15, 176:19, 214:11, 215:18, 227:14  
**themselves** [7] - 83:10, 93:25, 134:24, 135:11, 135:12, 147:14, 203:26  
**THEN** [13] - 31:9, 31:27, 51:16, 56:22, 62:11, 64:29, 115:17, 159:14, 164:15,

176:19, 214:11, 215:18, 227:14  
**there'** [1] - 122:15  
**thereafter** [2] - 101:17, 179:6  
**therefore** [6] - 17:22, 149:17, 151:26, 188:14, 194:2, 218:17  
**thinking** [3] - 40:13, 184:13, 184:26  
**third** [3] - 135:14, 175:3, 187:5  
**thorn** [1] - 30:26  
**thoughts** [2] - 49:19, 49:22  
**threat** [55] - 6:18, 25:4, 25:7, 45:22, 46:22, 46:29, 99:19, 117:2, 118:4, 126:3, 132:25, 132:26, 133:20, 134:2, 134:3, 135:5, 135:11, 135:12, 135:22, 135:28, 136:9, 137:14, 137:16, 138:15, 138:21, 138:23, 138:24, 138:26, 139:26, 140:26, 148:24, 148:28, 149:4, 149:29, 151:5, 159:25, 160:15, 165:22, 165:25, 166:25, 166:29, 167:2, 171:13, 174:5, 204:26, 210:11, 210:17, 210:21, 214:23, 215:3, 219:22, 222:1, 222:20  
**Threat** [2] - 118:24, 126:2  
**threaten** [1] - 19:27  
**threatened** [3] - 129:11, 178:11, 187:19  
**threats** [65] - 6:18, 6:22, 6:24, 12:4, 16:10, 16:12, 16:15, 16:19, 16:21, 16:28, 36:25, 36:26, 36:27, 37:1, 38:2, 42:27, 43:9, 62:1, 71:27, 72:8, 136:4, 136:5, 137:3, 137:15, 137:28, 138:7, 140:24, 146:12, 146:15, 146:17, 146:19, 146:21, 147:6, 147:13, 147:14, 147:24,

147:27, 153:5, 153:12, 153:17, 160:28, 162:15, 167:16, 167:19, 171:10, 171:21, 174:9, 174:11, 174:13, 180:10, 181:17, 182:16, 188:3, 204:14, 204:15, 204:18, 208:29, 209:28, 210:6, 210:9, 214:15, 214:18, 214:19, 214:22  
**three** [7] - 12:29, 32:25, 102:24, 139:9, 157:2, 207:1, 211:23  
**threshold** [4] - 66:11, 87:5, 87:12, 87:23  
**throughout** [3] - 57:12, 178:12, 188:4  
**Thursday** [6] - 127:8, 128:12, 128:13, 128:23, 129:11, 129:23  
**ties** [1] - 130:11  
**tight** [1] - 205:7  
**time-line** [1] - 205:7  
**timeframe** [3] - 208:9, 209:26, 211:19  
**title** [2] - 25:18, 26:6  
**today** [5] - 66:21, 99:5, 159:7, 177:25, 215:21  
**together** [10] - 15:23, 20:5, 23:14, 30:7, 130:8, 182:21, 182:29, 183:11, 197:13, 224:4  
**Tom** [1] - 125:23  
**tomorrow** [1] - 108:13  
**tonight** [1] - 23:29  
**took** [28] - 9:17, 9:27, 9:28, 16:26, 16:27, 25:28, 33:4, 33:7, 38:14, 42:18, 43:24, 56:5, 62:5, 73:16, 77:7, 85:26, 90:2, 122:16, 130:21, 141:6, 147:1, 157:10, 157:25, 168:4, 177:23, 184:14, 191:18, 222:13  
**top** [3] - 81:5, 108:5, 123:21  
**topics** [1] - 132:11  
**towards** [2] - 61:29, 205:6

**town** <sup>[1]</sup> - 41:5  
**Town** <sup>[24]</sup> - 6:12, 33:10, 33:13, 33:15, 34:6, 35:17, 35:18, 43:6, 48:13, 48:15, 48:16, 72:5, 116:12, 117:4, 125:23, 180:24, 183:23, 195:12, 218:3, 218:14, 221:14, 221:21, 226:13  
**townland** <sup>[1]</sup> - 117:5  
**tracing** <sup>[1]</sup> - 168:4  
**track** <sup>[1]</sup> - 101:14  
**tracked** <sup>[1]</sup> - 83:15  
**tracking** <sup>[1]</sup> - 134:10  
**tracks** <sup>[1]</sup> - 134:11  
**traffic** <sup>[4]</sup> - 13:8, 32:27, 160:12, 165:1  
**trail** <sup>[2]</sup> - 45:26, 194:8  
**training** <sup>[7]</sup> - 31:20, 32:11, 85:28, 116:11, 138:11, 164:27, 177:13  
**transcript** <sup>[2]</sup> - 1:26, 113:12  
**transcripts** <sup>[3]</sup> - 64:3, 69:26, 159:17  
**transfer** <sup>[5]</sup> - 48:25, 48:26, 217:20, 218:8, 223:26  
**transferred** <sup>[26]</sup> - 31:14, 32:14, 32:15, 32:23, 33:2, 33:3, 33:6, 48:22, 116:14, 116:16, 116:19, 164:28, 164:29, 165:3, 165:5, 165:11, 165:14, 177:3, 177:6, 177:9, 177:12, 177:15, 177:21, 177:22, 203:2, 218:2  
**transmission** <sup>[1]</sup> - 91:12  
**transmitted** <sup>[1]</sup> - 81:28  
**transpired** <sup>[1]</sup> - 40:12  
**transport** <sup>[1]</sup> - 203:27  
**travel** <sup>[1]</sup> - 39:11  
**travelled** <sup>[1]</sup> - 37:14  
**treat** <sup>[4]</sup> - 112:19, 120:15, 124:2, 129:2  
**treated** <sup>[1]</sup> - 138:19  
**treating** <sup>[1]</sup> - 171:25  
**treatment** <sup>[2]</sup> - 120:5, 164:5  
**trees** <sup>[2]</sup> - 110:8, 134:23  
**trespass** <sup>[1]</sup> - 66:29  
**Trevor** <sup>[1]</sup> - 52:15  
**trial** <sup>[2]</sup> - 69:17, 86:25  
**trials** <sup>[4]</sup> - 97:19, 97:20, 97:24, 111:21  
**TRIBUNAL** <sup>[3]</sup> - 1:3, 2:6, 227:14  
**tribunal** <sup>[2]</sup> - 217:11, 217:12  
**Tribunal** <sup>[52]</sup> - 30:25, 32:8, 33:22, 36:14, 39:2, 40:28, 50:17, 52:27, 52:28, 53:2, 64:22, 65:15, 66:20, 69:13, 69:26, 71:17, 84:4, 96:26, 105:29, 123:20, 133:25, 156:5, 157:15, 164:24, 166:7, 167:14, 167:18, 169:14, 172:17, 175:6, 177:1, 183:14, 187:28, 191:2, 192:24, 196:10, 200:6, 200:25, 207:24, 211:17, 212:5, 213:16, 216:6, 216:8, 216:10, 217:5, 217:7, 223:28, 224:21, 225:9, 227:6  
**Tribunal's** <sup>[1]</sup> - 216:5  
**TRIBUNALS** <sup>[1]</sup> - 1:9  
**trips** <sup>[1]</sup> - 220:2  
**trivial** <sup>[3]</sup> - 12:7, 12:15, 12:16  
**trivialise** <sup>[1]</sup> - 154:17  
**trouble** <sup>[1]</sup> - 111:21  
**troubling** <sup>[2]</sup> - 57:7, 61:28  
**true** <sup>[3]</sup> - 67:29, 121:4, 164:6  
**trust** <sup>[1]</sup> - 144:3  
**try** <sup>[2]</sup> - 96:1, 110:9  
**trying** <sup>[8]</sup> - 44:15, 70:18, 99:5, 143:16, 153:18, 168:2, 183:27, 202:14  
**TUESDAY** <sup>[2]</sup> - 1:18, 6:1  
**Tuesday** <sup>[2]</sup> - 168:10, 169:10  
**turn** <sup>[5]</sup> - 66:13, 106:10, 111:16, 187:13, 217:15  
**turned** <sup>[2]</sup> - 199:27, 224:22  
**turning** <sup>[1]</sup> - 217:16  
**TUSLA** <sup>[1]</sup> - 2:15  
**Tusla** <sup>[17]</sup> - 22:6, 22:9, 169:21, 169:25, 169:29, 170:3, 174:17, 174:26, 175:5, 182:26, 183:9, 204:20, 216:21, 223:17, 225:6, 225:7, 225:10  
**twenty** <sup>[1]</sup> - 132:9  
**twice** <sup>[1]</sup> - 195:2  
**twist** <sup>[1]</sup> - 157:7  
**two** <sup>[67]</sup> - 21:13, 30:23, 33:13, 33:17, 33:24, 33:27, 35:27, 41:19, 52:20, 63:17, 64:15, 75:15, 75:17, 77:3, 77:4, 77:5, 85:2, 98:23, 100:1, 100:2, 101:15, 107:11, 108:18, 108:19, 109:12, 110:7, 113:19, 114:5, 114:7, 120:5, 127:13, 129:28, 130:2, 130:7, 130:8, 131:13, 133:23, 139:9, 139:15, 140:24, 143:20, 144:11, 144:13, 147:18, 148:12, 148:17, 151:18, 152:14, 152:16, 159:15, 164:4, 174:14, 178:7, 179:14, 180:26, 182:14, 193:12, 202:28, 204:21, 204:25, 206:24, 211:23, 215:23, 216:20, 216:29, 220:1  
**two-and-a-half** <sup>[4]</sup> - 130:2, 130:7, 130:8, 139:9  
**type** <sup>[6]</sup> - 38:6, 161:27, 162:13, 163:9, 163:26, 185:20  
**typed** <sup>[6]</sup> - 25:24, 25:25, 26:13, 26:14, 107:18, 126:26  


---

**U**  


---

**ulterior** <sup>[1]</sup> - 222:17  
**ultimately** <sup>[2]</sup> - 183:13, 190:29  
**UN** <sup>[1]</sup> - 177:11  
**unambiguous** <sup>[1]</sup> - 94:6  
**uncomfortable** <sup>[1]</sup> - 172:19  
**uncommon** <sup>[2]</sup> - 99:1, 108:18  
**under** <sup>[72]</sup> - 13:20, 13:27, 14:22, 14:28, 14:29, 15:5, 15:10, 15:17, 28:17, 29:28, 30:2, 34:3, 46:17, 46:22, 52:3, 56:10, 59:17, 68:13, 68:15, 68:21, 68:22, 70:2, 75:3, 75:28, 76:10, 76:16, 77:29, 79:25, 80:24, 83:29, 84:2, 84:17, 86:28, 88:29, 90:9, 90:18, 90:25, 91:1, 92:9, 92:13, 92:22, 93:28, 94:4, 94:11, 96:7, 96:22, 102:5, 102:9, 103:8, 103:10, 103:13, 103:21, 105:12, 110:23, 111:6, 111:7, 111:8, 111:29, 112:3, 112:5, 112:15, 112:18, 112:22, 119:5, 125:9, 126:2, 134:2, 177:27, 188:25, 193:27, 193:29, 197:16  
**UNDER** <sup>[2]</sup> - 1:3, 1:9  
**underlined** <sup>[2]</sup> - 86:14, 87:4  
**undermine** <sup>[1]</sup> - 78:13  
**underneath** <sup>[1]</sup> - 189:20  
**understood** <sup>[15]</sup> - 42:28, 73:28, 75:22, 88:23, 99:29, 105:6, 105:7, 148:23, 150:26, 172:9, 182:19, 183:9, 200:4, 214:26, 225:18  
**undertaken** <sup>[1]</sup> - 29:15  
**undertook** <sup>[4]</sup> - 29:25, 39:8, 39:24, 166:20  
**unfamiliar** <sup>[1]</sup> - 70:26  
**unfortunate** <sup>[1]</sup> - 220:20  
**unfortunately** <sup>[4]</sup> - 20:8, 188:4, 202:16, 202:18  
**unhappiness** <sup>[1]</sup> - 226:13  
**uniform** <sup>[1]</sup> - 32:26  
**unit** <sup>[7]</sup> - 82:11, 116:17, 165:1, 165:4, 165:5, 165:6, 167:7  
**Unit** <sup>[2]</sup> - 195:11, 197:12  
**units** <sup>[2]</sup> - 101:15, 197:13  
**university** <sup>[1]</sup> - 201:16  
**unless** <sup>[6]</sup> - 19:11, 91:21, 91:25, 170:18, 200:29, 227:11  
**unlike** <sup>[1]</sup> - 83:6  
**unlikely** <sup>[2]</sup> - 121:22, 175:2  
**unsound** <sup>[1]</sup> - 112:10  
**UNTIL** <sup>[1]</sup> - 227:14  
**untoward** <sup>[3]</sup> - 47:13, 47:15, 55:19  
**unusual** <sup>[11]</sup> - 49:12, 53:15, 57:6, 57:20, 57:22, 57:24, 59:14, 61:27, 79:1, 143:2, 191:12  
**up** <sup>[51]</sup> - 17:15, 17:27, 23:8, 27:16, 28:21, 28:24, 33:4, 33:7, 34:1, 42:26, 44:17, 49:16, 53:2, 55:8, 58:11, 58:14, 76:29, 82:8, 98:1, 99:3, 114:15, 116:14, 122:16, 122:27, 125:5, 127:29, 130:21, 135:14, 142:17, 144:4, 146:8, 152:12, 154:26, 160:29, 161:7, 162:5, 162:28, 165:12, 167:19, 169:5, 170:27, 172:20, 177:23, 195:4, 205:10, 205:17, 218:28, 219:16, 220:15, 220:27, 224:23  
**up-to-date** <sup>[1]</sup> - 162:5  
**upcoming** <sup>[1]</sup> - 72:7  
**update** <sup>[3]</sup> - 8:8, 17:10, 18:25  
**updates** <sup>[2]</sup> - 42:29, 195:2  
**upgrade** <sup>[1]</sup> - 133:2  
**upgraded** <sup>[1]</sup> - 136:10  
**upheld** <sup>[1]</sup> - 12:25  
**upset** <sup>[7]</sup> - 156:3, 156:29, 157:5, 185:16, 204:28, 205:1, 217:22  
**urban/rural** <sup>[1]</sup> - 134:22  
**urgency** <sup>[2]</sup> - 118:7,

137:18  
**urgent** [2] - 20:15,  
101:14  
**useful** [3] - 66:23,  
175:14, 195:19  
**usual** [4] - 83:5,  
103:25, 103:28,  
145:14

---

## V

---

**vacancy** [1] - 98:2  
**vacant** [1] - 48:4  
**valid** [1] - 209:10  
**validity** [2] - 69:2,  
97:22  
**value** [1] - 216:7  
**variety** [1] - 179:7  
**various** [18] - 9:13,  
46:11, 69:28, 80:22,  
97:18, 129:17,  
129:19, 139:24,  
165:15, 167:7,  
178:11, 180:27,  
181:20, 187:20,  
188:3, 219:23,  
223:17, 227:6  
**vary** [1] - 57:29  
**vehicle** [2] - 178:13,  
187:21  
**venture** [1] - 128:8  
**verbal** [4] - 122:14,  
122:22, 130:19,  
149:10  
**verbally** [2] - 178:10,  
187:18  
**verbatim** [1] - 1:26  
**version** [2] - 107:18,  
208:25  
**versus** [1] - 38:8  
**via** [3] - 73:18, 98:26,  
191:22  
**video** [4] - 62:8,  
62:12, 62:13, 221:8  
**view** [33] - 11:29,  
16:11, 16:21, 20:18,  
29:25, 38:16, 39:19,  
56:5, 66:9, 67:5,  
68:17, 78:15, 90:16,  
99:12, 105:7, 105:10,  
107:12, 107:13,  
119:7, 121:22,  
140:12, 144:6,  
148:21, 152:18,  
169:24, 173:22,  
174:24, 184:23,  
187:4, 204:27,  
214:16, 217:7  
**viewed** [1] - 30:26

**views** [6] - 27:7,  
80:5, 97:6, 142:14,  
204:25  
**village** [1] - 116:15  
**Vincent** [1] - 8:23  
**vindictively** [1] -  
184:29  
**violence** [5] - 161:1,  
161:13, 161:18,  
161:20, 162:2  
**virtue** [3] - 136:9,  
159:24, 226:18  
**virtues** [1] - 103:15  
**vis-à-vis** [1] - 140:26  
**vis-à-vis** [2] - 67:11,  
90:7  
**visit** [4] - 117:12,  
118:15, 225:23,  
225:29  
**visited** [1] - 117:14  
**visits** [1] - 46:26  
**vocabularies** [1] -  
70:1  
**void** [1] - 19:2  
**volition** [3] - 93:4,  
93:28, 111:13  
**volume** [1] - 51:20  
**Volume** [1] - 32:2  
**voluntary** [2] -  
125:17, 163:10  
**volunteered** [2] -  
154:11, 154:19

---

## W

---

**wait** [4] - 47:20,  
86:22, 134:15, 200:16  
**waiting** [1] - 163:19  
**walk** [3] - 119:6,  
132:28, 157:10  
**walk-through** [1] -  
132:28  
**Wallace** [4] - 116:3,  
133:19, 148:10, 223:7  
**WALLACE** [7] - 4:27,  
116:6, 133:18, 148:9,  
159:14, 163:21,  
175:29  
**wants** [3] - 92:12,  
131:20, 225:14  
**WAS** [27] - 6:7,  
30:22, 31:9, 32:5,  
40:25, 51:1, 51:22,  
56:22, 62:11, 63:15,  
65:3, 81:16, 100:29,  
107:9, 110:6, 116:6,  
133:18, 148:9,  
159:14, 163:21,  
164:22, 170:8,

175:29, 176:26,  
193:2, 211:8, 214:11  
**watch** [1] - 158:26  
**water** [3] - 66:24,  
102:1, 161:23  
**ways** [1] - 224:10  
**wedding** [9] - 36:3,  
42:1, 42:14, 72:7,  
129:15, 129:16,  
166:9, 222:18, 222:20  
**WEDNESDAY** [1] -  
227:14  
**Wednesday** [2] -  
109:2, 220:27  
**wee** [1] - 19:3  
**weed** [1] - 15:6  
**week** [7] - 18:18,  
47:29, 131:19,  
131:22, 197:10, 224:8  
**weekend** [14] -  
36:29, 37:2, 37:3,  
37:5, 74:23, 165:27,  
166:4, 168:9, 168:13,  
168:15, 168:20,  
168:29, 169:1  
**weekly** [2] - 6:28, 7:3  
**weeks** [3] - 50:14,  
139:9  
**welcome** [1] -  
201:22  
**welfare** [1] - 154:25  
**well-being** [1] - 20:6  
**west** [1] - 116:15  
**Westport** [16] -  
17:11, 17:19, 18:8,  
18:11, 18:26, 19:1,  
28:20, 29:19, 29:26,  
38:29, 39:5, 39:8,  
39:12, 39:25, 47:9,  
221:16  
**whatsoever** [1] -  
131:10  
**WHELAN** [1] - 2:11  
**whereas** [3] -  
139:23, 188:7, 212:1  
**whereby** [4] - 14:24,  
15:3, 144:24, 203:14  
**whilst** [4] - 124:10,  
124:14, 130:14,  
177:10  
**whistleblower** [1] -  
226:15  
**whole** [9] - 26:3,  
86:10, 152:5, 153:17,  
154:15, 160:27,  
161:12, 165:20,  
205:14  
**wide** [2] - 66:7,  
101:19  
**wife** [2] - 85:28,

161:7  
**windows** [2] -  
117:26, 134:26  
**winging** [1] - 202:26  
**winning** [1] - 220:24  
**wise** [1] - 219:6  
**wish** [9] - 13:3,  
92:20, 93:29, 94:20,  
98:25, 104:19,  
111:16, 159:2, 201:15  
**wished** [4] - 79:28,  
98:17, 109:10, 208:26  
**wishes** [5] - 80:4,  
92:15, 92:22, 94:4,  
216:8  
**withdraw** [3] - 18:19,  
18:23, 70:18  
**withdrawal** [3] -  
179:14, 185:26,  
208:18  
**withdrawn** [2] -  
18:27, 208:20  
**withdraws** [1] -  
224:17  
**withdrew** [1] - 18:28  
**WITHDREW** [7] -  
31:27, 51:16, 64:29,  
115:17, 164:15,  
176:19, 215:18  
**withstanding** [1] -  
162:29  
**witness** [16] - 32:1,  
39:28, 51:18, 60:14,  
60:16, 65:1, 90:14,  
108:21, 121:15,  
121:21, 158:29,  
159:4, 164:17,  
176:21, 199:24,  
215:20  
**WITNESS** [9] - 4:2,  
31:27, 51:16, 64:29,  
107:9, 115:17,  
164:15, 176:19,  
215:18  
**witness's** [1] -  
199:28  
**witnesses** [5] -  
22:28, 69:28, 83:4,  
88:5, 219:25  
**woman** [6] - 120:15,  
124:2, 129:2, 150:24,  
150:25, 150:26  
**women's** [3] -  
162:17, 162:22, 163:6  
**wonder** [2] - 32:7,  
60:12  
**wondering** [5] - 76:6,  
156:14, 156:16,  
199:11, 201:2  
**word** [12] - 31:17,  
87:3, 88:7, 88:9,  
128:19, 152:7, 155:3,  
162:26, 195:27,  
198:17, 209:8, 210:26  
**word-processing** [1]  
- 31:17  
**wording** [1] - 214:24  
**words** [16] - 13:29,  
15:20, 53:20, 55:25,  
57:14, 57:19, 59:15,  
59:23, 64:12, 107:29,  
111:6, 160:17,  
203:25, 223:3, 224:23  
**workforce** [1] -  
41:11  
**working'** [1] - 123:5  
**works** [2] - 125:17,  
220:15  
**worried** [1] - 213:2  
**worst** [1] - 162:4  
**WRIGHT** [5] - 4:20,  
65:3, 81:16, 100:29,  
110:6  
**Wright** [15] - 58:15,  
65:1, 65:5, 67:26,  
81:17, 101:1, 101:29,  
102:16, 105:7, 106:2,  
107:7, 107:11,  
108:28, 115:15,  
224:12  
**write** [7] - 76:13,  
110:25, 139:12,  
139:17, 141:12,  
186:12, 200:17  
**writing** [8] - 14:7,  
52:18, 98:26, 106:22,  
109:26, 133:14,  
194:9, 198:4  
**written** [18] - 14:5,  
19:14, 75:11, 85:21,  
88:13, 96:24, 97:22,  
99:28, 112:25, 134:3,  
152:21, 157:19,  
192:17, 195:2,  
211:21, 212:23, 214:4  
**wrote** [10] - 13:7,  
99:3, 127:19, 176:10,  
188:16, 190:16,  
200:17, 213:22,  
215:10, 223:25

---

## Y

---

**year** [9] - 7:26,  
31:14, 32:17, 32:23,  
33:6, 44:21, 58:1,  
82:21, 206:1  
**years** [23] - 24:21,  
30:24, 31:16, 32:21,  
32:25, 40:29, 44:11,

44:25, 69:16, 70:23,  
78:17, 99:6, 99:7,  
115:8, 127:2, 130:2,  
130:7, 130:8, 161:6,  
161:18, 163:5, 199:2,  
202:28

**young** [2] - 85:29,  
161:17

**yourself** [10] - 25:28,  
44:13, 47:17, 51:8,  
55:11, 80:11, 80:20,  
87:12, 90:21, 190:14

**yourselves** [2] -  
69:7, 70:5

---

## Z

---

**Zappone** [1] - 227:1

---

## É

---

**ÉIREANN** [2] - 1:5,  
1:6

---

## Ó

---

**Ó** [2] - 3:8, 216:29  
**ó** [1] - 216:28