

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 THURSDAY, 17TH MAY 2018 - DAY 77

77

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 SGT. McCABE: MR. MICHAEL McDOWELL SC
MR. PAUL McGARRY SC
MR. BREFFNI GORDON BL
INSTRUCTED BY: SEAN COSTELLO & COMPANY
HALIDAY HOUSE
32 ARRAN QUAY
DUBLIN 7

FOR THE COMMISSIONER: MR. SHANE MURPHY SC
MR. MÍCHEÁL P. O'HIGGINS SC
MR. CONOR DIGNAM SC
MR. NOEL WHELAN BL
MR. DONAL MCGUINNESS BL
MR. JOHN FITZGERALD BL
INSTRUCTED BY: MS. ALISON MORRISSEY
MS. EMMA GRIFFIN
CHIEF STATE SOLICITOR'S OFFICE
OSMOND HOUSE
LITTLE SHIP STREET
DUBLIN 8

FOR SUPT. TAYLOR: MR. MICHAEL O'HIGGINS
MS. TARA BURNS SC
MR. JOHN FERRY BL
INSTRUCTED BY: MR. CARTHAGE CONLON
M. E. HANAOE SOLICITORS
SUNLIGHT CHAMBERS
21 PARLIAMENT STREET
DUBLIN 2

FOR ALISON O'REILLY: MR. FÍONÁN Ó MUIRCHEARTAIGH BL
MR. MICHAEL WALL BL
INSTRUCTED BY: AUGUSTUS CULLEN LAW SOLICITORS
18 BOW STREET
SMITHFIELD
DUBLIN 7

FOR RTÉ:
INSTRUCTED BY: MR. SEAN GILLANE SC
MR. RONAN KENNEDY BL
PATRICIA HARRINGTON, RTÉ

FOR INDEPENDENT NEWS
AND MEDIA
& PAUL WILLIAMS:
INSTRUCTED BY: MR. ROSSA FANNING SC
MR. JOHN FREEMAN BL
MR. KIERAN KELLY
FANNING & KELLY SOLICITORS
HATCH HALL
HATCH STREET LOWER
SAINT KEVIN'S
DUBLIN 2

FOR MICHAEL O' TOOLE:
MR. ANTHONY THUILIER BL
MR. KIERAN KELLY
FANNING & KELLY SOLICITORS
HATCH HALL
HATCH STREET LOWER
SAINT KEVIN'S
DUBLIN 2

FOR ASSOCIATED NEWSPAPERS
LIMITED, DEBBIE McCANN,
SEBASTIAN HAMILTON
& CONOR O' DONNELL
INSTRUCTED BY: MR. MICHAEL KEELEY
DMG MEDIA IRELAND

FOR TIMES NEWSPAPERS LIMITED
& NEWS GROUP NEWSPAPERS
LIMITED:
MR. SIMON McALEESE
SIMON McALEESE SOLICITORS
CUNNINGHAM HOUSE
FRANCIS STREET
MERCHANTS QUAY
DUBLIN 8

FOR THE IRISH EXAMINER,
JUNO McENROE,
DANIEL McCONNELL
CORMAC O' KEEFFE,
TIM VAUGHAN &
MICK CLIFFORD:
MR. OISÍN QUINN SC
MR. DARRYL BRODERICK
RONAN DALY JERMYN SOLICITORS
THE EXCHANGE
GEORGE'S DOCK
IFSC
DUBLIN 1

FOR THE IRISH TIMES
DESIGNATED ACTIVITY
COMPANY, THE IRISH
TIMES TRUST & CONOR LALLY:

MR. DAVID PHELAN
HAYES SOLICITORS
LAVERY HOUSE
2 EARLSFORT TERRACE
DUBLIN 2

FOR MRS. MICHELLE TAYLOR:
INSTRUCTED BY:

MR. FELIX McENROY SC
O'MARA GERAGHTY McCOURT
51 NORTHUMBERLAND ROAD
DUBLIN 4

FOR JOHN McGUINESS:
INSTRUCTED BY:

MR. DARREN LEHANE BL
LAWLOR PARTNERS SOLICITORS
ARRAN SQUARE
ARRAN QUAY
DUBLIN 7

FOR GEMMA O'DOHERTY:
INSTRUCTED BY:

MR. JOHN BERRY BL
MR. DARRAGH MACKIN
KRW LAW
THIRD FLOOR
9-15 QUEEN STREET
BELFAST
COUNTY ANTRIM

FOR ALAN SHATTER:
INSTRUCTED BY:

MS. EILEEN BARRINGTON SC
MR. CATHAL MURPHY BL
MR. BRIAN GALLAGHER
GALLAGHER SHATTER SOLICITORS
4 UPPER ELY PLACE
DUBLIN 2

I NDEX

WITNESS	PAGE
SUPERINTENDENT DAVID TAYLOR	
CROSS-EXAMINED BY MR. MÍCHEÁL O'HIGGINS	6
CROSS-EXAMINED BY MR. PHELAN	48
EXAMINED BY MS. BURNS	50
CROSS-EXAMINED BY MR. BERRY	67
FURTHER CROSS-EXAMINED BY MR. MÍCHEÁL O'HIGGINS	70
RE-EXAMINED BY MR. MCGUINNESS	71
QUESTIONED BY THE CHAIRMAN	107
MR. ALAN SHATTER	
DIRECTLY EXAMINED BY MS. LEADER	116
CROSS-EXAMINED BY MR. GORDON	159
CROSS-EXAMINED BY MS. BURNS	184
CROSS-EXAMINED BY MR. DIGNAM	187
RE-EXAMINED BY MS. LEADER	194

1 THE HEARING RESUMED, AS FOLLOWS, ON THURSDAY, 17TH MAY
2 2018:

3
4 SUPERINTENDENT DAVID TAYLOR, WAS CROSS-EXAMINED BY
5 MR. MÍCHEÁL O' HIGGINS AS FOLLOWS:

10:27

6
7 1 Q. MR. MÍCHEÁL O' HIGGINS: Good morning, Superintendent.
8 When we broke up prior to your wife giving her evidence
9 to the Tribunal, I was bringing you over Martin
10 Callinan's position in relation to your meetings with
11 him subsequent your going on suspension, isn't that
12 right?

10:38

13 A. That's correct.

14 2 Q. You recall that. And I'd indicated to you
15 Mr. Callinan's recollection that you and he had -- you
16 had called to his home in, he thought, June of 2014 and
17 again around October 2014, and I think you had
18 indicated you agreed with that?

10:38

19 A. Yes.

20 3 Q. Right. And I was putting to you that in relation to
21 the next meeting that he recalls, where again you
22 called over to his home was in, some time after your
23 suspension and arrest?

10:38

24 A. That's correct, yes.

25 4 Q. Is that right?

10:39

26 A. Yes.

27 5 Q. Right. And his position is that in the first two
28 meetings you were sounding off or you were being
29 critical of Commissioner O'Sullivan arising out of your

1 unhappiness with having been transferred.

2 A. That's not true.

3 6 Q. That's not true?

4 A. No.

5 7 Q. All right. And your feelings, or your mood on visit 10:39
6 number three, after your arrest, were heightened, you
7 were more agitated and you were venting - that's my
8 word now, but you were quite agitated in relation to
9 Nóirín O'Sullivan?

10 A. I was concerned for the family circumstances I was in 10:40
11 at the time.

12 8 Q. And his position is that you were giving out as to how
13 badly you had been treated, as you saw it, at the time
14 of your arrest and you were giving out -- well, first
15 of all, do you accept that; you were giving out about 10:40
16 your arrest?

17 A. I was, as I said, telling him about the robust arrest I
18 had and interview. But I wouldn't say it was giving
19 out. It was giving an account of it.

20 9 Q. And Martin Callinan inquired as to why you'd been 10:40
21 arrested and you said you were accused of leaking to
22 the media when all you had done was your job and you'd
23 done nothing wrong?

24 A. I wouldn't say that. I just said I was arrested in
25 relation to leaks to the media. 10:40

26 10 Q. Well, sorry, did you not give Mr. Callinan to
27 understand -- did you not convey to him, really quite
28 clearly, as far as you're concerned it was unfair,
29 you'd done nothing wrong, you'd only been doing your

1 job?

2 A. No. As I said, I told him the circumstances of the
3 arrest and the mechanics around it and what I had gone
4 through.

5 11 Q. And my instructions are that he didn't pursue it with 10:41
6 you, his thoughts were that there was an investigation
7 ongoing and he didn't develop the matter further. Do
8 you agree or disagree with that?

9 A. No, I didn't develop it any further.

10 12 Q. Right. But in terms of your arrest, he's clear in his 10:41
11 recollection, I suggest to you, that you were blaming
12 the Commissioner for his arrest, and I want to put this
13 specific matter to you: You said you would bring her
14 down - "her" being Nóirín O'Sullivan - because of what
15 she had done to you? 10:41

16 A. Absolutely not. I wouldn't say such a thing to his
17 closest colleague -- about his closest colleague.

18 13 Q. I beg your pardon?

19 A. Commissioner O'Sullivan and Commissioner Callinan were
20 very close colleagues. I wouldn't say any matters like 10:42
21 that.

22 14 Q. Well, we're talking now about a situation where Martin
23 Callinan has retired a year and a number of months ago.

24 A. Mm-hmm.

25 15 Q. Isn't that right? 10:42

26 A. That's right.

27 16 Q. You're agitated, I'm suggesting to you, highly agitated
28 and you're giving out about Nóirín O'Sullivan and
29 actually, at this point in time, I'm suggesting to you,

1 you have lost balance and you're making fairly wild
2 allegations and you are actually giving out very
3 severely about Nóirín O'Sullivan.

4 A. I don't accept that.

5 17 Q. And you are giving out about it being difficult to meet 10:42
6 your financial commitments due to the unfairness as to
7 having been put on reduced pay.

8 A. I spoke about my pay and how it had been cut to 75% and
9 how that was difficult, yes.

10 18 Q. And my instructions are that that's the last time you 10:42
11 called to Commissioner Callinan's, former Commissioner
12 Callinan's home.

13 A. I would agree with that, yeah.

14 19 Q. Well, were you looking for Martin Callinan to do
15 something for you? 10:43

16 A. Absolutely not.

17 20 Q. But what was your purpose in going to his home? You
18 hadn't done that much when he was actually the
19 Commissioner.

20 A. I was, I was at his home regularly when he was 10:43
21 Commissioner.

22 21 Q. I wish to suggest to you that that's not correct.

23 A. Well, I suggest it is. Because I was there.

24 22 Q. All right. And can you give a specific occasion on
25 which you were in Martin Callinan's home prior to June 10:43
26 '14?

27 CHAIRMAN: I think what we're talking about here -
28 because again there's a possibility of misunderstanding
29 - is, okay, you may have called up with papers or

1 whatever, because of a press briefing or anything like
2 that --

3 A. Yeah.

4 CHAIRMAN: -- but as I read the statement of
5 Commissioner Callinan, this was more in the way of a 10:43
6 social or a friendly visit, which you had not done
7 before. Do you see the difference?

8 A. Oh, yeah, I understand.

9 CHAIRMAN: That's what counsel's asking you about.

10 A. Yes, I would've called because, in the discharge of my 10:44
11 duties I would've called to his house during my time as
12 Press Officer and he was Commissioner.

13 23 Q. MR. MÍCHEÁL O' HIGGINS: Sorry, I just missed that
14 there. Say that again.

15 A. I would've called to his house concerning my duties as 10:44
16 Press Officer when he was Commissioner.

17 24 Q. And is it your position that you never called with any
18 social call, 'How are you getting on Martin' sort of
19 call?

20 A. When? During the time he was Commissioner? 10:44

21 25 Q. Yes.

22 A. No, I wouldn't do anything like that.

23 26 Q. Right. These visits post his retirement, June '14,
24 October '14 and, most particularly, the one after May
25 '15, when you'd been arrested, after you'd been 10:44
26 arrested, what was the purpose of those visits?

27 A. I'd great respect for Commissioner Callinan, you saw
28 from my texts I sent him on the night he had resigned.
29 So I held him in high esteem.

1 27 Q. To see how he was keeping?
2 A. Yes.

3 28 Q. But if you don't mind me saying, it would appear that,
4 certainly from my instructions, it was all about you,
5 you were the one who was doing the venting, speaking, 10:45
6 giving out?

7 A. No. He asked me on one occasion, I think one of the
8 occasions I dropped up, to collect photographs for him
9 from an event, he had been down in Cork at the, he
10 visited the Lord Mayor in Cork, and I got those 10:45
11 photographs and dropped them up for him.

12 29 Q. Well, can I ask you this: were you expecting or hoping
13 that Martin Callinan would advocate for you in relation
14 to the difficult position in which you found yourself?

15 A. Absolutely not. 10:45

16 30 Q. Were you disappointed that he didn't --
17 A. I wouldn't ask him --

18 31 Q. -- offer to do so?
19 A. I wouldn't ask him and I wouldn't put him in that
20 position. 10:46

21 32 Q. Do you take any view -- do you have any view on whether
22 he did or didn't do anything to help you?

23 A. Well, all I can say is I didn't ask him, I didn't seek
24 any intervention by him.

25 33 Q. Well, there's three visits here. They're not related 10:46
26 to work apparently. He's retired. You're not offering
27 any work related reason as to why you were there.
28 You've gone there in which you're giving out about
29 Nóirín O'Sullivan, I'm suggesting to you, particularly

1 in visit number three, you're giving out about your
2 situation, you're giving out about having been
3 arrested, you're giving out about your financial
4 difficulties, you're giving out about all things
5 personal to you, and I'm suggesting to you that all 10:46
6 points of the compass points towards you having a
7 purpose in going to his home, hopeful that he will do
8 something for you.

9 A. Absolutely not. As I said, I still regularly keep in
10 contact with retired members, people that I had worked 10:46
11 with who were bosses of mine down through the years.

12 34 Q. And you were disappointed, I'm suggesting to you, that
13 his attitude, with his response, was pretty well along
14 the lines of well, listen, knuckle down, get on with
15 it, do your best'. It wasn't offering you much 10:47
16 proactive help, isn't that so?

17 A. I never sought help from Commissioner Callinan.

18 35 Q. Now, can I ask you about -- just before we move off
19 Martin Callinan I want to make one or two things clear
20 to you. Firstly, in relation to your suggestion that 10:47
21 you sought from him the Ms. D file, that's flatly
22 rejected. Are you clear on that, he does not accept
23 that?

24 A. Okay.

25 36 Q. All right. And I think I've asked you this already, 10:47
26 but am I correct you're not in a position to identify
27 by approximate date or tie to any particular event the
28 occasion on when you say you did make that request in
29 relation to the Ms. D file?

1 A. No.

2 37 Q. You're not?

3 A. No.

4 38 Q. Now, in relation to Nóirín O'Sullivan, I wish to
5 suggest to you that - and I've taken instructions on 10:48
6 this - Nóirín O'Sullivan has no recollection of you
7 phoning her up to say along the lines of 'Paul Williams
8 is in the home of Ms. D' or the D household, all right?
9 Are you clear on that?

10 A. Yeah, she didn't ring -- she rang me. 10:48

11 39 Q. She rang you to tell you that he was in the D
12 household, is it?

13 A. No, no. No, no. I text her and she rang me back.

14 40 Q. I see. Well, I'm suggesting to you that that's not
15 correct. 10:49

16 A. Well, that's my evidence.

17 41 Q. All right. And I think you've indicated your
18 recollection that you spoke to her -- whenever you
19 spoke to her, it was on the Saturday when you maintain
20 Paul Williams was in the D household, isn't that right? 10:49

21 A. That's my evidence, yes.

22 42 Q. And you've been insistent, whatever about putting a
23 date on it, you're insistent it's a Saturday, I think,
24 in March of 2014, isn't that right?

25 A. Yeah. 10:49

26 43 Q. Right. And you're clear she differs with you on that?
27 All right. Now, in relation to a number of matters
28 arising from yesterday's evidence on transcript, can I
29 ask you some questions in relation to those please?

1 Yesterday your wife Michelle confirmed that you told
2 her the only thing you were being investigated for was
3 the leaking of information in relation to the Roma
4 children.

5 A. Well, that was the main, that was headline issue. 10:50

6 44 Q. Well, no, Ms. Leader was careful - actually I think it
7 was in redirect, on page 232 of the transcript of
8 yesterday, line 23 - she was careful to elicit that
9 with clarity from your wife. And her position, as I
10 read it certainly, was that you told her the only thing 10:50
11 you were being investigated for was the leaking of
12 information relating to the Roma children. All right?
13 So if that be the case, Superintendent, my question is:
14 why didn't you give your wife the full truthful
15 picture? 10:50

16 A. My wife knows the full truthful picture.

17 45 Q. Well, why did you tell her -- why did you not tell her
18 that you'd been investigated and subsequently arrested
19 for far more than just allegedly leaking the
20 information pertaining to the Roma children? 10:51

21 A. My wife fully, is fully aware of all the issues in
22 relation to my arrest.

23 46 Q. So was your wife incorrect in the evidence she gave?

24 A. I'm just saying my wife fully is aware of all the
25 circumstances and the investigation. 10:51

26 47 Q. Well, why would she misstate what she was told by you?

27 A. Maybe it's the way the question was asked. All I can
28 say is my wife is fully aware.

29 48 Q. You see, I'm suggesting to you that there may be a

1 reason in fact that you undersold matters to your wife,
2 there may be a reason as to why you didn't give your
3 wife the full picture concerning the investigation.

4 A. No, my wife is fully aware.

5 49 Q. And she may not be the only person you kept in the dark 10:52
6 or didn't provide the complete picture to.

7 A. My wife is fully aware.

8 50 Q. Your wife also indicates, in answer to questions from
9 more than one barrister, certainly she said it to
10 Mr. Whelan yesterday, page 229 of the transcript where 10:52
11 she confirmed that at the meeting of 20th September
12 2016 you told Maurice McCabe that Nóirín O'Sullivan was
13 anxious to get a charge on you, isn't that right?

14 A. I said that Nóirín O'Sullivan's husband was part of the
15 investigation, and she would be fully aware of the 10:52
16 investigation.

17 51 Q. No, no, I'm putting something quite separate to that to
18 you now, Superintendent. Just focus on this please; it
19 was your wife's recollection that amongst the things
20 you told Sergeant McCabe at the meeting of 20th 10:53
21 September was that Nóirín O'Sullivan was anxious to put
22 a charge on you. Now, first of all, is your wife
23 correct in recalling that's what you said?

24 A. I fully respect my wife's recollection. I've other
25 recollections. So I can't put it any more than that. 10:53

26 52 Q. Well, what would you have -- what did you mean? What
27 did you say that caused your wife - whatever about
28 Sergeant McCabe, who also, I suggest to you, has a
29 better memory on these matters that you do - what did

1 you say that caused your own wife to think you were
2 complaining that Nóirín O'Sullivan was anxious to get a
3 charge on you? What might you have said?

4 A. Well, it's a well known fact that Nóirín O'Sullivan's
5 husband was part of the investigation. And there was 10:54
6 concern in relation to, as I said, get a fair hearing
7 because of the obvious conflict, potential conflict of
8 interest.

9 53 Q. Well, let's explore the possibilities. You see,
10 there's this meeting of 20th September 2016, but there 10:54
11 were other meetings, isn't that right? And obviously,
12 as you've confirmed to the Tribunal already, there were
13 many, many discussions between you and your wife?

14 A. Yes.

15 54 Q. So I'm wondering, and partly in fairness to your 10:54
16 position as to your insistence of matters as to the
17 20th September meeting, but is it possible that on
18 other occasions you gave your wife to understand that
19 Nóirín O'Sullivan was anxious to get a charge on you?

20 A. No. 10:55

21 55 Q. But, sure, wasn't that your position as relayed to the
22 deputies?

23 A. No. Like, I mean, I said it was a matter of fact that
24 Commissioner O'Sullivan's husband was part of my
25 investigation. 10:55

26 56 Q. No, no. We have the notes from Mick Wallace, Deputy
27 Wallace, we have the notes from Deputy Daly. They
28 speak volumes, if I may put it as bluntly as that.
29 It's clear. You were maintaining a position to

1 parliamentarians in Dáil Éireann that you were being
2 unjustly pursued, these were trumped up charges is how
3 Deputy Wallace noted it, trumped up charges. So can
4 you just come clean about this? weren't you telling
5 various people around about this time, September or 10:56
6 October 2016, you were being unjustly pursued and these
7 were trumped up charges?

8 A. I don't agree with that.

9 57 Q. Well, wasn't that your view, these were unfair charges?

10 A. I never said that. 10:56

11 58 Q. Didn't you tell -- doesn't Sergeant McCabe have in his
12 PD, in his protected disclosure, that you were being
13 pursued because you knew too much?

14 A. I can only say what I can say, Mr. O'Higgins. I can't
15 comment on what other people say or record. 10:56

16 59 Q. But all these people seem to have made similar mistakes
17 or identical mistakes and you're the common -- you're
18 the only one who has it right?

19 A. Well, I can only say what I know from my knowledge. I
20 can't speak for other people. 10:56

21 60 Q. Well, let's look at what Mr. Clifford's evidence is, or
22 will be. And Mr. Quinn, on behalf of Examiner
23 Publications, and Mr. Clifford set out with clarity his
24 client's position in relation to these matters. All
25 right? And I want to get you -- if we could deal with 10:57
26 these. He indicates that, or it was indicated on his
27 behalf that Mick Clifford met you and your wife on, he
28 believes, two occasions during the summer of 2016.
29 First of all, is that correct?

1 A. Yes.

2 61 Q. That's right?

3 A. Hmm.

4 62 Q. Right. So are we agreed, therefore, that in fact, 10:57
5 contrary to the exchange you and I had yesterday, you
6 now agree with the position that you shared with Mick
7 Clifford your role in the smear campaign prior to your
8 meeting with Sergeant McCabe on the 20th September?

9 A. No.

10 63 Q. You remain of that -- 10:57

11 A. Yeah.

12 64 Q. Sorry, I don't want to be mischaracterising your
13 position --

14 A. Yeah.

15 65 Q. -- you're holding to that? 10:57

16 A. Yes.

17 66 Q. All right. Well, Mick Clifford is going to say, as
18 identified by his counsel, that in the first meeting
19 you laid out a case that the criminal investigation was
20 motivated by N6ir6n O'Sullivan. Do you agree or 10:58
21 disagree with that?

22 A. I disagree.

23 67 Q. And you also put forward a case that she wanted to get
24 her hands on your mobile phones, and that was why the
25 criminal investigation was brought? 10:58

26 A. No.

27 68 Q. You disagree with that, do you?

28 A. Yes.

29 69 Q. Your wife was asked about that and she didn't recollect

1 that.

2 A. Sorry?

3 70 Q. Your wife was asked about that.

4 A. Yes.

5 71 Q. And her response, and I'm paraphrasing here, but she 10:58
6 did not recollect that.

7 A. Okay.

8 72 Q. And Mr. Clifford, through counsel, indicated that you
9 pointed out in that first meeting the connection that
10 Nóirín O'Sullivan's husband was on the investigation 10:59
11 team. Did you do that?

12 A. Yes, yes.

13 73 Q. All right. And your wife agreed with that.

14 A. Yeah.

15 74 Q. And Mr. Clifford indicates that you said the reason she 10:59
16 wanted to get the phones was because there was evidence
17 that would link Nóirín O'Sullivan to the smear
18 campaign.

19 A. No.

20 75 Q. Well, you see, aren't we moving to the core of it 10:59
21 there, Superintendent? Because that would be important,
22 wouldn't it, if in fact the Tribunal were to decide
23 that that was said by you to Mick Clifford.

24 A. Well, as I say, I can only give my evidence and I'll
25 leave it in the Chairman's hands to determine the -- 10:59

26 76 Q. You see, that would be important, I'm suggesting to
27 you, because that would be a link between the criminal
28 investigation into you, the whole issue about the
29 phones, your position that the criminal investigation

1 was improper and was brought for an improper reason and
2 your overall claim at the core of this Tribunal that
3 there was a smear campaign; all of these things are
4 bound up into that case you were making, I'm
5 suggesting, to Mick Clifford. The reason Nóirín 11:00
6 O'Sullivan wanted to get the phones was because there
7 was evidence that would link her to the smear campaign,
8 that's what you said.

9 A. I don't accept that.

10 CHAIRMAN: In other words, it was an evidence 11:00
11 destruction exercise --

12 A. No.

13 CHAIRMAN: -- as opposed to a genuine investigation.

14 A. I accept the investigation, Judge.

15 CHAIRMAN: No, but I mean -- 11:01

16 A. No.

17 CHAIRMAN: -- I think the point that's being put to
18 you, just so we all understand it, is --

19 A. Yeah.

20 CHAIRMAN: -- that what you told Mr. Clifford is that 11:01
21 Nóirín O'Sullivan wanted to get hold of your phones,
22 had them seized, had your computer seized as well in
23 order to get them wiped so there would be no reference
24 to her being involved in the campaign against Maurice
25 McCabe. I think I'm putting that correctly, am I, 11:01
26 Mr. O'Higgins.

27 MR. MÍCHEÁL O' HIGGINS: Yes, Chairman.

28 CHAIRMAN: All right. So that is the point.

29 A. Yeah. I don't accept it.

1 CHAIRMAN: Yes.

2 77 Q. MR. MÍCHEÁL O' HIGGINS: And further to that,
3 Superintendent -- I'm just looking at the transcript
4 from yesterday on page 223, this now is questioning of
5 your wife Michelle. She was asked: 11:01
6
7 "You were present at the meetings with Mr. Clifford in
8 June or July of 2016?"
9
10 And she says: 11:01
11
12 "No. I think Dave did say that there was a campaign."
13
14 And question:
15 11:02
16 "Sorry?"
17
18 And she answered:
19
20 "I think, you know, Dave did acknowledge there was a 11:02
21 campaign, to the best of my recollection."
22
23 And then the question was:
24
25 "Sorry, I didn't hear that answer. Tell me it again." 11:02
26
27 And she came back in answer:
28
29 "I think he did say there was a campaign, like that he

1 was part of a campaign.
2 Q. He told Michael Clifford he was part of a campaign?
3 A. Yeah, I think so. To the best of my knowledge,
4 yeah.
5 Q. That was at the meeting in June or July? 11:02
6 A. Well, in our house.
7 Q. In June or July?
8 A. I can't remember which, but --
9 Q. Well, they were before he met Maurice McCabe for the
10 first time? 11:02
11 A. Yeah, they were before Maurice McCabe. "
12
13 That's your wife's testimony.
14 A. Yes.
15 78 Q. So it seems you're the odd one out here; your wife and 11:02
16 Mick Clifford are clear that you relayed the smear
17 campaign and your role in it to the journalist prior to
18 the meeting with Sergeant McCabe, which was apparently,
19 on your case, some class of cathartic meeting.
20 A. I don't accept that. 11:03
21 79 Q. So now, in the light of that being your wife's
22 evidence, you've an opportunity to revisit the
23 position; do you wish to revisit your evidence --
24 A. No.
25 80 Q. -- and perhaps clarify and accept that that is the 11:03
26 case?
27 A. No.
28 81 Q. Well, then if we move to the second meeting that you
29 had with Mr. Clifford. And his counsel indicated that

1 this was towards the end of the summer of 2016. In
2 fairness, he wasn't in a position -- his client's
3 instructions didn't indicate it was a precise time, but
4 the estimate was given "a month or so after the first
5 meeting." Now, do you agree or disagree with that; did 11:04
6 the second meeting with Mr. Clifford take place a month
7 or so after the first meeting?
8 A. I would generally accept that.
9 82 Q. You would?
10 A. Yeah. 11:04
11 83 Q. So, does that mean, therefore, that the second meeting
12 also predated the meeting with Maurice McCabe on 20th
13 September?
14 A. I think so. I think so.
15 84 Q. You think so? 11:04
16 A. Yeah.
17 85 Q. Right. And Mr. Clifford's position, as relayed by
18 counsel, was that he came back, as journalists do
19 acting properly --
20 A. Yeah. 11:04
21 86 Q. -- he came back to check up on a couple of details so
22 he'd have them clear and he'd have them right.
23 A. Yeah.
24 87 Q. And the three things he needed to come back on with you
25 were the following: Firstly, to check with you that 11:04
26 texts, that is text messages, had been used to blacken
27 Sergeant McCabe's name. That's the first thing. And
28 Mr. Clifford, through counsel, indicated you confirmed
29 "Yes" to that.

1 A. I don't accept that. I've never said that.

2 88 Q. The second thing that he asked clarification on in the
3 second meeting was that there was an intelligence
4 file -- whether you were saying that there was an
5 intelligence file on you in Garda Headquarters; do you 11:05
6 remember that?

7 A. I stated that it was my belief. I now know from direct
8 evidence that's not true.

9 89 Q. So do you accept -- I appreciate you accept, quite
10 properly, to your credit, that's not a true claim. 11:06

11 A. No, I accept that.

12 90 Q. But are you accepting that you did confirm to
13 Mr. Clifford that that was a claim you were making,
14 there was an intelligence file on you in Garda
15 Headquarters and that this confirmation by you was 11:06
16 given in the second meeting with Mick Clifford?

17 A. I can't actually recall that, and that's being totally
18 honest. I can't recall saying that. I just can't
19 recall that.

20 91 Q. But if he says that, you wouldn't contradict it? 11:06

21 A. Well, I just said I had said it and I accept it now
22 that it's not true.

23 92 Q. The third thing that he indicates he sought clarity on
24 was your contention that a guard had been assigned to
25 monitor Sergeant McCabe on Pulse. All right? 11:06

26 A. Yeah.

27 93 Q. And the indication was, through counsel again, that you
28 confirmed that as well.

29 A. No, I would've said that your Pulse activity would be

1 monitored, I didn't say any particular guard, because I
2 don't know who monitors that.

3 94 Q. So is that a yes to that, you agree with him? I just
4 want to ascertain the differences --

5 A. Oh, yeah, your Pulse records, yeah. 11:07

6 95 Q. All right. Now, just then so I have the sequencing
7 clear in terms of the roll call of people to whom you
8 confessed, on your contention, your role in the smear
9 campaign and in whom you confided. The first person
10 was Michelle? 11:07

11 A. Yes.

12 96 Q. You're not able to put a date on that?

13 A. No.

14 97 Q. Did you hear her evidence yesterday --

15 A. No. 11:07

16 98 Q. -- did she bring that earlier a little bit than you?

17 A. I didn't hear her evidence yesterday.

18 99 Q. All right. The second person was Mick Clifford.

19 A. I don't accept that.

20 100 Q. Well, who was the second person then? 11:08

21 A. Father Joe, the priest.

22 101 Q. Well, when was the priest?

23 A. August I think. August, August '14, end of July/August
24 '14. I can't give you the exact date. My wife rang
25 the priest. 11:08

26 102 Q. But you see, does that tally? I had understood you not
27 to differ with Mr. Clifford's position that both
28 meetings with him were in the summer.

29 A. Yes.

1 103 Q. And there was about a month or so - and I acknowledge
2 there's wriggle room there - but there was an interval
3 of a month or maybe a month plus between the two
4 meetings?
5 A. Yeah. 11:08

6 104 Q. Right? Summer is, some people put May into the summer,
7 let's go June or July or August. Forget about May;
8 June July August is the summer, isn't that right?
9 A. Yes.

10 105 Q. That would put your first meeting certainly, I'm 11:09
11 suggesting to you, it would predate the meeting with
12 Father Joe.
13 A. Well, as I said, I've always said my wife, Father Joe
14 and Sergeant McCabe.

15 106 Q. I wonder is that a problem for your account and how 11:09
16 might your account be assessed; your priorities were
17 journalist first, the priest later?
18 A. No.

19 107 Q. Then Maurice McCabe?
20 A. No. 11:09

21 108 Q. Then protected disclosure. That's the sequence, isn't
22 it?
23 A. It was my wife, Father Joe, Sergeant McCabe, protected
24 disclosure.

25 109 Q. Followed by politicians? 11:10
26 A. I didn't seek the politicians' attention.

27 110 Q. You opened up a front, a political front. You were
28 using your skills as somebody who is doing a Master's
29 in political communications.

1 A. I don't subscribe to that.

2 111 Q. Can I ask you about something different now, if I may,
3 Superintendent, and that is the PAC meeting of 23rd
4 January 2014 - so we're going back in the time machine
5 for a moment - and ask you to deal with the PAC 11:10
6 meeting, all right?

7 A. Okay.

8 112 Q. And you accept, do you not, that you met Deputy
9 McGuinness -- well, my question, first of all, is when
10 did you first meet Deputy McGuinness? 11:11

11 A. In January '16.

12 113 Q. In January '16?

13 A. Yes.

14 114 Q. And how often did you meet him?

15 A. I just met him once in the Skylon Hotel. 11:11

16 115 Q. Just the one meeting?

17 A. Yeah.

18 116 Q. And were there -- I think there were other meetings, or
19 were there, or contacts, between Deputy McGuinness and
20 your wife? 11:11

21 A. Yes.

22 117 Q. Right. But your recollection is, in terms of your own
23 presence, you were present for just the one meeting?

24 A. Yes.

25 118 Q. Now, your account of the contentious remark which you 11:11
26 claim was uttered by Martin Callinan about Sergeant
27 McCabe at the end of the PAC meeting was what?

28 A. That I heard Commissioner Callinan say to Deputy
29 McGuinness that Sergeant McCabe was a kiddie fiddler.

1 119 Q. Was a kiddie fiddler?
2 A. Yes.
3 120 Q. You see, I wonder if we could have page 1419 up please,
4 which is volume 6 for your benefit there,
5 Superintendent. 11:12
6 A. 1419 is it?
7 121 Q. 1419.
8 A. Are you sure it's volume 6?
9 122 Q. I think so, yes.
10 A. Sorry, I can't see -- 11:13
11 123 Q. Do you have it there?
12 A. It's come up on the screen, yeah.
13 124 Q. It's on the screen?
14 A. Yeah.
15 125 Q. All right. Sorry, I thought that was the correct 11:13
16 volume. Now, this is now the statement of Deputy John
17 McGuinness of 28th March 2017. And this is the first
18 statement, the first of two statements that Deputy
19 McGuinness provided to the Tribunal, isn't that right?
20 A. Em -- 11:13
21 126 Q. You see, isn't that a difficulty for you,
22 Superintendent - he provided two statements? You're
23 aware of that, are you?
24 A. No, I wasn't aware, I'm not aware what statements he
25 makes. 11:13
26 127 Q. Well, are you not getting the material circulated to
27 you?
28 A. Well, I accept what you're saying; if you're saying
29 there's two statements, I accept that.

1 128 Q. Well, you see, Deputy McGuinness was cross-examined, at
2 some length actually, by different people, including
3 myself, as to his allegation concerning what he says
4 Commissioner Callinan said on this occasion in a
5 pejorative fashion with respect to Sergeant McCabe. 11:14
6 You're aware of that --

7 A. Yes.

8 129 Q. -- there was contention over that?

9 A. Yes, yes.

10 130 Q. And it was put to Deputy McGuinness that he had 11:14
11 enlarged upon, or maybe the word was "improved" upon
12 his account in statement number two that he gave, which
13 was given as recently as 2018, this year. But you see,
14 I'm suggesting to you the difficulty for you - which is
15 revealing, I'm suggesting to you, Superintendent - is 11:14
16 that you decided to sign up to statement number one,
17 the reference to "kiddie fiddler", and no more. Do you
18 understand?

19 CHAIRMAN: Mr. O'Higgins, maybe you'd just be so kind
20 as to explain that, because I'm not completely getting 11:15
21 it.

22 MR. MÍCHEÁL O' HIGGINS: Certainly.

23 CHAIRMAN: If you wouldn't mind please? So if you
24 wouldn't mind just quoting the first statement and then
25 if you say the statement of the Superintendent came 11:15
26 after that and then if there's a modification in the
27 second statement, maybe you'd just put that, just so as
28 the witness understands.

29 131 Q. MR. MÍCHEÁL O' HIGGINS: Thank you, Chairman. I'll try

1 to do it more clearly. (To witness) So on page 1419,
2 Superintendent, paragraph 6, we have what is the only,
3 the only wording or allegation provided by Deputy
4 McGuinness in his first statement concerning the
5 "kiddie fiddler" alleged remark. And in fact what it 11:15
6 says is the following:

7
8 "At the conclusion of the hearing on 23rd January 2014,
9 as was my usual practice when Chairman of the
10 committee, I approached Mr. Callinan to thank him for 11:15
11 attending the committee. Mr. Callinan was with
12 Ms. Nóirín O'Sullivan and David Taylor and he said to
13 me 'This man fiddles with children. This is
14 outrageous'. I took the reference to 'this man' to
15 refer to Mr. McCabe." 11:16
16

17 And that was the extent of what he said. All right?
18 And I'm suggesting to you that your version, "kiddie
19 fiddler", is pretty close to that.

20 A. Well, all I can say is what I heard. 11:16

21 132 Q. Isn't that right; they are pretty close?

22 A. Again I can only reiterate what I have in my
23 statements, what I heard Commissioner Callinan say to
24 Deputy McGuinness.

25 133 Q. And of course, we know, don't we, that there is no 11:16
26 reference whatever by you to this having been said by
27 Martin Callinan in your protected disclosure?

28 A. The protected disclosure was never a complete document.

29 134 Q. Yes. But now if we look at John McGuinness' second

1 statement, we see what he says, which is, I'm
2 suggesting to you, a considerable enlargement - I say a
3 different account, but that's a matter for the Tribunal
4 ultimately - it's something really quite different to
5 what is said in the first statement to which you appear 11:17
6 to have signed up to, I'm suggesting. All right? And
7 that's on page 2165 in the materials. And this is a
8 statement from an interview that Deputy McGuinness gave
9 to the investigators on 15th March -- sorry, on 28th
10 March 2018. And it starts on page 2162 and I think the 11:18
11 relevant part to bring you to is page 2165. Do you see
12 that there?

13 A. Yes.

14 135 Q. And Deputy McGuinness says here in his statement that:

15
16 "In this particular case I did exactly as I would 11:18
17 normally do and in the course of that I came down to
18 where Commissioner Callinan was. "

19
20 And he says: 11:18

21
22 "He was in the flow of conversation about former Garda
23 John Wilson. "

24
25 Just pause there. Do you have any recollection of 11:18
26 Commissioner Callinan re-telling a yarn or a story
27 about John Wilson?

28 A. As I said yesterday or the day before, at the end of
29 meetings the protocol was for me, when the senior

1 officers would stand up, I'd go and retrieve their
2 hats, the Commissioner's hat and satchel. So I had
3 turned away and then I turned back to hand the
4 Commissioner his hat and satchel.

5 136 Q. You appear keen to tie yourself to the hat and satchel 11:19
6 piece. You've said that now perhaps four times.

7 A. I'm just giving you what my protocol would've been
8 always to do.

9 137 Q. No, it's a simple question. You're there, according to
10 John McGuinness, according to Martin Callinan. 11:19

11 A. I was aware spatially that they were engaged, but I was
12 turned away and then turned back.

13 138 Q. Spatially they were engaged? who was engaged?

14 A. The Commissioner and Deputy McGuinness.

15 139 Q. Well, as I understand it, Deputy McGuinness' position 11:19
16 in fact was that Martin Callinan was telling this story
17 to those around him other than himself, so in other
18 words, to guards.

19 A. Well, the only guards there were Deputy O'Sullivan,
20 Assistant Commissioner O'Mahony, Andrew McLindon. 11:20

21 140 Q. And you.

22 A. Yes.

23 141 Q. So what do you say to Deputy McGuinness' suggestion
24 that when Deputy McGuinness came upon the group
25 Commissioner Callinan was telling a story about John 11:20
26 Wilson? Did you hear any of that?

27 A. I didn't hear that. Because as I said to you before, I
28 had turned away to get his hat and satchel, then I
29 turned back and I was then standing right behind him.

1 142 Q. But was there any impediment? You were close enough, I
2 understood Deputy McGuinness to indicate you were close
3 enough to hear things?
4 A. Well, I was focused on retrieving the Commissioner's
5 hat and his satchel. 11:20

6 143 Q. But was the Commissioner in a group?
7 A. Yes, there was a group there, yes.

8 144 Q. Right. Which included you?
9 A. Well, I was behind -- he was in front of me, Deputy
10 O'Sullivan to the left, Commissioner O'Mahony, Andrew 11:21
11 McLindon, so the group, and then Deputy --

12 145 Q. All right. Well, were you close enough to hear what
13 was being said by the man?
14 A. When I turned back around after handing him his hat, I
15 could see him saying to Deputy McGuinness. 11:21

16 146 Q. You could see him saying?
17 A. Well, I was behind him and I could see him directly, I
18 could hear him.

19 147 Q. So you could hear what was being said by Martin
20 Callinan in the group? 11:21
21 A. When I heard him saying the "kiddie fiddler", yes.

22 148 Q. Well, did your ears close after that? Did you hear
23 what the man was saying?
24 A. No, it's just that I heard, I heard him saying to
25 Deputy McGuinness that Sergeant McCabe was a kiddie 11:21
26 fiddler.

27 149 Q. Well, you see, if Deputy McGuinness is correct, you, as
28 part of the Garda group, would also have heard a story
29 being told, quite a colourful story I'm suggesting to

1 you, that would stick out in a person's mind. Let's go
2 through the story as relayed by the Deputy on the
3 statement:

4
5 "Commissioner Callinan was relating a story about how 11:22
6 John Wilson was called with other Gardaí to a
7 disturbance in Grafton Street involving horses."

8
9 Now, did you hear that, anything about horses?

10 A. I didn't hear that part of the story, no. 11:22

11 150 Q. You didn't?

12 A. No.

13 151 Q. Because that would stick out in your mind, wouldn't it,
14 a story about horses?

15 A. As I said to you before, I was retrieving his hat and 11:22
16 satchel. So I'd gone to the seat behind where he'd
17 been sitting.

18 152 Q. Well, no, whatever about horses, that's perhaps not of
19 itself memorable, but horses on Grafton Street is
20 slightly memorable; you'd remember that? It's an 11:22
21 unusual event, isn't that right?

22 A. But I wasn't listening -- I didn't hear that
23 conversation.

24 153 Q. Right. He goes on:

25 11:23
26 "When John Wilson got to Grafton Street, Commissioner
27 Callinan in his own words said" - according to John
28 McGuinness - "he pulled the knackers off the horse, he
29 confiscated the horse, mounted the horse and rode it

1 back to the barracks, where he tied it to the
2 railings. "
3
4 Now, did you hear Commissioner Callinan use
5 inappropriate language, presumably directed at members 11:23
6 of the travelling community?
7 A. As I said before, I was retrieving his hat and satchel,
8 I turned away and then when I turned back I heard the
9 kiddie fiddler conversation. I wasn't concentrating or
10 I wasn't listening to any other conversation before 11:24
11 that.
12 154 Q. Would Martin Callinan, as a guard, as the most senior
13 guard in the land, use the expression "the barracks"?
14 Isn't that a civilian terminology?
15 A. No -- 11:24
16 155 Q. Old style terminology?
17 A. It's a very old style police terminology.
18 156 Q. I'm suggesting to you it's terminology used by
19 civilians.
20 A. No, still, as I said, it still would be en vogue today. 11:24
21 157 Q. In any event, did you hear it?
22 A. Did I hear which?
23 158 Q. Did you hear him mention something about riding a horse
24 back to the barracks?
25 A. I didn't hear that part of the conversation. 11:24
26 159 Q. Or it being tied to the railings?
27 A. No.
28 160 Q. And did you hear him mention "and the other fella
29 fiddles with kids"?

1 A. I heard the "kiddie fiddler", yes.

2 161 Q. No, no, "and the other fella fiddles with kids"; did
3 you hear that?

4 A. I heard Commissioner Callinan say to Deputy McGuinness
5 that Sergeant McCabe is a kiddie fiddler. That's what 11:24
6 I heard.

7 162 Q. Well, help me with this: Did you hear Commissioner
8 Callinan say:
9

10 "And that's the type of fucking headbangers I'm dealing 11:25
11 with"?

12 A. I can't recall hearing that.

13 163 Q. No, because that would certainly stick out in your
14 mind, wouldn't it?

15 A. Well, I don't recall hearing that. 11:25

16 164 Q. Bad language like that in front of a parliamentarian,
17 senior Garda officers, formal setting, Dáil Éireann,
18 PAC meeting?

19 A. I have to be -- in fairness to Commissioner Callinan, I
20 never heard him using bad language. It wasn't part of 11:25
21 his vocabulary.

22 165 Q. Pardon?

23 A. I've never heard Commissioner Callinan use bad language
24 in his vocabulary.

25 166 Q. All right. Well, thank you for that. So that isn't 11:25
26 the type of thing he would've said?

27 A. Well, I've never heard him saying it. I don't know
28 whether he would say it, but he's never said it in my
29 company.

1 167 Q. You see, Deputy McGuinness' position was that he didn't
2 participate in conversation at all. Do you agree or
3 disagree with that?
4 A. Well, I can't say what Deputy McGuinness did. All I
5 can say is what I heard and what I saw. 11:26
6 168 Q. You see, it was Martin Callinan's recollection that in
7 fact he had asked Deputy McGuinness whether John Wilson
8 would be called before the PAC and that the deputy had
9 said 'You must be joking. Sure he's a fucking header.
10 Do you remember that? 11:26
11 A. No, I don't.
12 169 Q. Well, whatever about the bad language, do you remember
13 the deputy making a comment, perhaps not the most
14 positive of comments, with respect to John Wilson?
15 A. As I said, the conversation part that I heard is the 11:26
16 one I placed in my statement and placed on record.
17 CHAIRMAN: I think maybe the point that counsel is
18 making to you is that one drifts in and out of
19 attention --
20 A. Yeah. 11:27
21 CHAIRMAN: -- unless one concentrates and when, if, as
22 you say, you heard the words "kiddie fiddler", you
23 would then have concentrated on what else was being
24 said. That's, I think, the point that counsel is
25 making. 11:27
26 A. As I said, when I heard the kiddie fiddler comment, I
27 think the conversation broke up at that stage and
28 everybody retreated out of the room.
29 170 Q. MR. MÍCHEÁL O' HIGGINS: But you see, I wish to suggest

1 to you, Superintendent, if, as you claim, you heard
2 "kiddie fiddler" --

3 A. Mm-hmm.

4 171 Q. -- your ears would've pricked up, because you would've
5 been concerned, 'what is this about? what is he saying 11:27
6 to somebody, a deputy in Dáil Éireann, amongst other
7 Garda colleagues?' Apparently out in the open, in a
8 formal setting, 'what is he saying?' You would've been
9 concerned, isn't that so?

10 A. Well, I never heard him saying it before. 11:27

11 172 Q. That's all the more reason. what was he doing? He was
12 going on some sort of mad solo run. He's accusing
13 Sergeant McCabe, who was to come before the PAC, about
14 whom there's been much controversy, you claim to have
15 heard him denigrate and use language reflective of a 11:28
16 belief that somehow he was a child abuser to the
17 Chairman of the very committee before whom he was
18 supposing to give evidence. So this would, I suggest
19 to you, had it occurred, would've immediately put you
20 on alert and caused you to listen in as to exactly 11:28
21 what's going on. You were the Press Officer.

22 A. That's what I heard. That day was taken up with the
23 whole "disgusting" word, because that was the day the
24 word "disgusting" was said and that was the whole
25 centre of the media attention that day. 11:29

26 173 Q. Ah, come on, Superintendent. "Disgusting" is league
27 division two compared to this. This is the
28 Commissioner accusing Sergeant McCabe, to the Chairman
29 of the PAC, of being a child abuser. This could've

1 been explosive on the radio, on the television, on the
2 newspapers that night.

3 A. Well, it wasn't. The whole -- that night dealt with
4 the "disgusting" word, that was the whole centre of the
5 whole media furore that day because of what had been 11:29
6 said at the PAC.

7 174 Q. But surely you took Andrew McLindon or Nóirín
8 O'Sullivan or one of your Garda colleagues aside and
9 say 'What did Martin just say? Did you hear what he
10 said?' 11:29

11 A. No, I didn't. Because they were in the same company.

12 175 Q. I beg your pardon?

13 A. They were in the same company.

14 176 Q. No, but if not the immediate seconds but in the
15 corridor out or in the postmortem afterwards or in the 11:30
16 car home?

17 A. The postmortem afterwards, Mr. O'Higgins, was all about
18 the word "disgusting".

19 177 Q. And there was no mention of "kiddie fiddler"?

20 A. It was all about "disgusting", that was the huge media 11:30
21 furore that day and for a number of days afterwards.

22 178 Q. In fact there was no mention of "kiddie fiddler" for
23 months and months later, isn't that right?

24 A. How do you mean?

25 179 Q. There was never any furore in relation to an alleged 11:30
26 remark about "kiddie fiddler" until this Tribunal was
27 set up and Deputy McGuinness put in his statement,
28 isn't that right?

29 A. Whether that's right will become a matter of inquiry by

1 this Tribunal.

2 180 Q. And you made no reference to it in your protected
3 disclosure. And the first time you made a reference to
4 it is at a point in time after you - and you accept
5 this, as I understand it - had spoken to John 11:31
6 McGuinness, isn't that right?

7 A. I don't accept that.

8 181 Q. But as a matter of temporal sequence, that is correct?

9 A. As I said, I always heard that, and I put it in my
10 statement. 11:31

11 182 Q. But you didn't put it in the PD.

12 A. As I said to you earlier on, Mr. O'Higgins, the PD is
13 not a complete document.

14 183 Q. And in your cathartic session with Maurice McCabe, you
15 didn't tell him about it. 11:31

16 A. Well, as I said, I put it in my statement and I placed
17 it before the Tribunal.

18 184 Q. And can you provide any explanation for how the remark
19 that you signed up to was the old version of Deputy
20 McGuinness' account and is not his new improved one? 11:31

21 A. I can only say what I heard and what I placed on
22 record.

23 185 Q. Now, Superintendent Taylor, I think you're aware of
24 this, but I wish to formally put to you the allegation
25 you made concerning the kiddie fiddler remark simply 11:32
26 never, that never occurred, Martin Callinan never said
27 any such thing. You're clear on that?

28 A. It was said.

29 186 Q. And you differ with him. All right. Now, I want to

1 move to your more core allegations, if I may,
2 concerning why this Tribunal was set up at all. And I
3 want to suggest to you that there is a reason,
4 Superintendent, as to why your account is vague and
5 lacking in specifics, all right? And I'm suggesting to 11:32
6 you that there's a reason there are no texts or
7 documents substantiating your account. Do you
8 understand?

9 A. Yes.

10 187 Q. And I'm suggesting to you that there is a reason you 11:33
11 appear to have watered down your account and removed
12 texts from the equation and that is your fear of being
13 directly caught out. Do you understand the point I'm
14 making?

15 A. Yes. 11:33

16 188 Q. And I'm suggesting to you that you have abandoned much
17 of what you told Sergeant McCabe, Deputy McGuinness,
18 Michael Clifford, Deputy Wallace and Deputy Daly and
19 possibly others, you've abandoned much of that again
20 for fear that your account would be exposed. Do you 11:33
21 understand the point I'm making?

22 A. Yes.

23 189 Q. And I'm suggesting to you that there's a reason that
24 not a single person is offering direct evidence to
25 support your story of an orchestrated smear campaign. 11:33

26 A. Well, I can only place my knowledge before this
27 Tribunal and I'll leave it to the Chairman to make his
28 decision.

29 190 Q. And regrettably, I must put to you that in the

1 predicament in which you found yourself, with your
2 world closing in around you effectively, you were under
3 pressure at home, with your finances in disarray and
4 above all else you had a strong sense of grievance that
5 you were being unfairly targeted in the criminal and 11:34
6 disciplinary proceedings, and I'm suggesting to you
7 that you had become fixated upon Nóirín O'Sullivan and
8 her husband in particular and you came up with a plan
9 to exact revenge for what you felt had been done to
10 you. Do you understand the point I'm making? 11:34

11 A. I understand the point you're making.

12 191 Q. And I'm suggesting to you that you came up with a plan
13 to shield yourself from the criminal and disciplinary
14 proceedings that you were facing. And I'm suggesting
15 to you that you decided that what better way of 11:35
16 defending your own self, of protecting yourself than
17 painting yourself as a victim and aligning yourself or
18 seeking to align yourself with Sergeant Maurice McCabe.
19 And as a result of this, as part of this plan, you
20 attempted to sell to Sergeant McCabe what were a load 11:35
21 of lies. Do you understand the point I'm making?

22 A. I understand the point you're making.

23 192 Q. And I'm suggesting to you that you hawked around those
24 lies to politicians and journalists, whomever would
25 listen to you, and that is the process that we see 11:35
26 underway in September/October of 2016 and onwards,
27 before and after you made your protected disclosure.
28 Do you understand?

29 A. I understand what you're saying.

1 193 Q. And that the purpose of this was to undermine Nóirín
2 O'Sullivan, and as part of that you had, and you felt
3 you had, to also attack Martin Callinan and you decided
4 to extend it out to Andrew McLindon as well. Were you
5 present for Andrew McLindon's evidence? 11:36

6 A. No.

7 194 Q. So you didn't hear him, when it was squarely put to
8 him, that he would have absolutely no truck with any
9 smear campaign if he heard any hint of it being
10 mentioned in Garda Headquarters, he would simply have 11:36
11 no truck with it and would have been appalled; were you
12 aware of that evidence?

13 A. Well, you're telling me now.

14 195 Q. And the same position of Commissioner Callinan and
15 former Commissioner O'Sullivan; they would be appalled 11:36
16 with that, would have no truck with that and, had it
17 occurred at all, they would simply not have tolerated
18 it. Do you understand?

19 A. I hear what you're saying.

20 196 Q. There's a few matters I want to, before we conclude, 11:37
21 put to you concerning Mr. Callinan's position.
22 Firstly, he disputes your position that - and these are
23 perhaps tangential matters, but it's proper I put them
24 nonetheless so you've a chance to deal with them.

25 A. Okay. 11:37

26 197 Q. He disputes your position that he requested you to leak
27 the letter concerning the Bandon Garda tapes to Paul
28 Reynolds on the day of his retirement. All right? His
29 position on that is that you came back in to him and

1 asked him for a copy of that letter because you
2 inevitably were going to be facing questions from
3 journalists as to the background to that matter and you
4 needed to read your way into it because you knew
5 nothing about it. Do you understand? 11:38

6 A. I understand what you're saying.

7 198 Q. He acknowledges that he gives you the letter, and
8 indeed he regrets doing that, but he says he certainly
9 did not give you any command or instruction to leak it
10 to the media and that was not his intention. 11:38

11 A. I have to reject that.

12 199 Q. All right. And I'm suggesting to you that --
13 CHAIRMAN: well, just, Mr. O'Higgins, vis-à-vis the
14 Bandon letter, as it's been called, I'm not going to
15 make a decision on that one way or the other. 11:38

16 MR. MÍCHEÁL O' HIGGINS: May it please your Lordship.
17 CHAIRMAN: I mean, it's there, it's been chucked into
18 the mix, it's a matter of credit. I really think it's
19 very, very far removed from anything that I'm trying to
20 deal with. But I appreciate you've put your client's 11:38
21 part --

22 200 Q. MR. MÍCHEÁL O' HIGGINS: Thank you, Chairman. That'll
23 speed it up then, I can strike a few matters from the
24 list I think. (To witness) I'm suggesting to you,
25 Superintendent, that Martin Callinan had a conversation 11:39
26 with you in relation - perhaps a number of
27 conversations - in relation to the John O'Mahony report
28 when it was published and in the context of that
29 Sergeant McCabe was undoubtedly mentioned and the

1 instruction that Sergeant McCabe -- that Commissioner
2 Callinan gave to you was to familiarise yourself with
3 the contents of the O'Mahony report, because it was
4 going to be a media issue and you needed to be on top
5 of the detail and across the detail in relation to 11:39
6 that. Do you recall that?

7 A. Commissioner Callinan, in relation to the O'Mahony
8 report, gave me a specific instruction to brief.

9 201 Q. I beg your pardon? To which?
10 A. He gave me a specific instruction to brief. 11:39

11 202 Q. To brief the media?
12 A. In relation to Sergeant McCabe not cooperating with the
13 O'Mahony report.

14 203 Q. Well, that's a difference between the two of you. But
15 you are aware, aren't you, that Commissioner Callinan 11:40
16 went on public record and made no secret of the fact,
17 his position that it was inappropriate for Sergeant
18 McCabe - and Sergeant McCabe, in fairness to him, holds
19 a different view - it was inappropriate for Sergeant
20 McCabe to not exhaust resources within An Garda 11:40
21 Síochána before going out with his allegations to the
22 PAC; you're aware that was the Commissioner's position?

23 A. As I said, I can only be -- I asked the Commissioner
24 for a direction on what to brief in relation to the
25 core point: Did Sergeant McCabe cooperate? And he told 11:40
26 me to brief that he didn't cooperate.

27 204 Q. Well, I'm suggesting to you that Commissioner Callinan
28 was clearcut in his publicly declared position, both
29 before the PAC and elsewhere, that he was not in favour

1 of serving Garda members disclosing personal sensitive
2 information from Pulse, he was not in favour of them
3 doing it before the PAC, there was different avenues to
4 pursue and one of those avenues was to exhaust internal
5 Garda structures, principally, in the case of Sergeant 11:41
6 McCabe, proactively getting involved and engaging with
7 John O'Mahony's investigation. Wasn't that
8 Commissioner Callinan's stated view?

9 A. I agree with you. But all I can say is the instruction
10 I got is -- 11:41

11 205 Q. And he made no bones about that. And that wasn't
12 hidden, nor was it sinister. It was contrary to the
13 position of Sergeant McCabe, I credit you, but it was
14 not in any way related to any sexual allegation or any
15 impropriety of that sort, isn't that right? 11:41

16 A. Well, as I say, that's Commissioner Callinan's words
17 so --

18 206 Q. I wish to suggest to you that, contrary to the
19 impression you've sought to give, Commissioner Callinan
20 was not fixated on Sergeant McCabe, the issues he was 11:41
21 raising were one of many significant issues for
22 Commissioner Callinan, who had a lot of other issues on
23 his desk, certainly the Sergeant McCabe issue, for want
24 of a better expression, was an important matter, was a
25 constant matter, but he'd a lot of other matters to 11:42
26 deal with. Broadly speaking, you'd accept that, I take
27 it?

28 A. As Commissioner of An Garda Síochána, he had a wide
29 body of work to do.

1 207 Q. And I'm suggesting to you that insofar as you gave
2 evidence yesterday that on one occasion - and I don't
3 think you were able to give it an approximate date -
4 that Martin Callinan rang you up and gave it to you in
5 the neck - do you recall that evidence? 11:42

6 A. Yes.

7 208 Q. I'm suggesting to you that that did not happen, that it
8 was not his style.

9 A. Em, I know his style.

10 209 Q. Well, I'm suggesting to you that isn't his style. 11:42
11 You've already indicated he's not a man who uses
12 intemperate language.

13 A. Well, as I say, I worked with him, so I know him.

14 210 Q. And I'm suggesting to you, finally, that the allegation 11:43
15 which is contained within your protected disclosure
16 which forms the basis of this Tribunal, you'd
17 appreciate it's Sergeant McCabe's position that he made
18 his protected disclosure because what you had told him,
19 isn't that right?

20 A. Yes. 11:43

21 211 Q. And his obviously is, with respect to him, Sergeant
22 McCabe's position is hearsay as to what he recalled you
23 saying. So this Tribunal is, in significant measure -
24 if we forget about the tangent dealing with Keith
25 Harrison - this Tribunal is about your allegation in 11:43
26 your protected disclosure, this is a protected
27 disclosure Tribunal about your allegation and it is not
28 the truth?

29 A. I don't accept that Mr. O'Higgins.

1 MR. MÍCHEÁL O' HIGGINS: Thanks very much.

2 CHAIRMAN: Thank you, Mr. O'Higgins. Now, I'm just
3 wondering is there anybody left? Media individuals
4 first of all. Yes.

5 MR. PHELAN: Chairman, my name is David Phelan, I 11:44
6 represent the Irish Times and Conor Lally and I've just
7 one matter I want to put to Superintendent Taylor.

8 CHAIRMAN: Okay. Do you understand now who he
9 represents?

10 A. I do. Yes, I do. 11:44

11

12 THE WITNESS WAS CROSS-EXAMINED BY MR. PHELAN AS

13 FOLLOWS:

14 212 Q. MR. PHELAN: In the interests of fairness,
15 Superintendent Taylor, I want to put to you what Conor 11:44
16 Lally told the Tribunal when he met its investigators.
17 There's a statement amongst the papers circulated by
18 the Tribunal which I can bring you to if needs be, but
19 it's a fairly fundamental proposition I want to put to
20 you. Mr. Lally said that whilst he's constrained in 11:44
21 some respects by journalistic privilege, there were a
22 couple of general statements he could make, and that's
23 what I want to put to you.

24

25 He said that he had not at any time had any discussions 11:44
26 with any member of An Garda Síochána, past or present,
27 which he regarded as an attempt to engage in negative
28 briefing about Sergeant McCabe or in any way undermine
29 or denigrate his character. And he said he could

1 confirm that no member of An Garda Síochána, past or
2 present, ever spoke to him about allegations of
3 criminal misconduct, whether sexual abuse or anything
4 of the like, about Sergeant McCabe. So in light of
5 your evidence, I wanted to put those to you to give you 11:45
6 an opportunity to respond

7 A. I just reiterate - and I just want to place on the
8 record I've great respect for Conor Lally as a
9 journalist - that I did speak to Mr. Lally and carried
10 out the instructions of Commissioner Callinan. 11:45

11 MR. PHELAN: I'm obliged, Chairman.

12 CHAIRMAN: So that's it? Right, thank you very much
13 Mr. Phelan. And then --

14 MR. PHELAN: Chairman, sorry, if it's of assistance to
15 the Tribunal, I understood that Mr. Berry, who has been 11:45
16 here and was here this morning, had intended to put
17 questions. I'm not sure has he just left the room. I
18 only say that if it's of assistance to the Tribunal.

19 CHAIRMAN: All right. I don't know, if you wouldn't
20 mind just sending him a text in the event that he's 11:45
21 just in or around the area then please.

22 MR. MCGUINNESS: Chairman, I understand he will be here
23 very shortly. He had been here a little bit earlier.

24 CHAIRMAN: Okay. Well, there's no panic. Okay, let's
25 not worry about it. He'll be here when he's here and 11:46
26 he can put whatever matter he wishes to put.

27 MS. BURNS: Chairman, perhaps I'll proceed then. I
28 only have a few questions for --

29 CHAIRMAN: Well, if you feel you can.

1 MS. BURNS: well, if Mr. Berry returns and he then
2 raises an issue that I need to return to, perhaps I
3 could. But I don't imagine that I will.

4 CHAIRMAN: Yes, of course.

5

11:46

6 THE WITNESS WAS EXAMINED BY MS. BURNS AS FOLLOWS:

7

8 213 Q. MS. BURNS: Superintendent Taylor, just a few very
9 short questions, firstly in relation to the evidence
10 that you gave to Mr. McGuinness when being questioned
11 by him in relation to Ms. Debbie McCann and Ms. Eavan
12 Murray in terms of them attending at Ms. D's house.

11:46

13 A. Yes.

14 214 Q. I think that in the course of your evidence to
15 Mr. McGuinness that you indicated that you would have
16 informed Martin Callinan and Nóirín O'Sullivan in
17 relation to their interactions, as had been your
18 routine practice regarding updates from journalists, is
19 that correct?

11:46

20 A. That's correct, yes.

11:47

21 215 Q. Now, I think that Mr. McGuinness brought your attention
22 to page 218 of the papers and an interview that you
23 provided to the Tribunal relatively recently. And I
24 think on that page there's reference -- sorry, if I
25 just can get my own. At the very bottom line, so it's
26 line 236, Mr. McGuinness drew your attention to the
27 fact that you indicate in that interview:

11:47

28

29 "I do believe that I would have texted or contacted the

1 former Commissioner Callinan at the time about what the
2 journalist told me."

3 Now, I think then Mr. McGuinness asked you whether that
4 meant that you didn't have contact with Ms. Nóirín
5 O'Sullivan in relation to that matter. 11:47

6 A. It was my standard practice to send two texts all the
7 time.

8 216 Q. Well, if I could then ask that page 220 of the papers
9 be placed up. And perhaps actually it goes into page
10 221. And I think that at the very end of page 220 you 11:48
11 refer to practices of journalists, but then when you go
12 into page 221, at the very top line, line 271, you say:

13
14 "I would have texted the former Commissioners to update
15 the information I received from Eavan Murray and Debbie 11:48
16 McCann."

17 A. Yes.

18 217 Q. Now, in relation to your reference to the former
19 Commissioners, who were you referring to there?

20 A. That's Mr. Callinan and Ms. O'Sullivan. 11:48

21 218 Q. I see. Thank you. In relation then to the smear
22 campaign that you say you received directions from
23 Mr. Callinan in relation to, your evidence has been
24 that that commenced sometime in the middle of 2013, is
25 that correct? 11:49

26 A. That's correct, yes.

27 219 Q. Now, the evidence has been that Mr. McLindon began his
28 occupation with An Garda Síochána in September of 2013?

29 A. That's correct.

1 220 Q. Had Mr. McLindon began his work with An Garda Síochána
2 before or after you had received those directions from
3 Mr. Callinan?
4 A. After.

5 221 Q. After. I see. Now, in relation then to your 11:49
6 interactions with Father - it's Father Joe Kennedy, I
7 think, is that correct?
8 A. That's right, yes.

9 222 Q. When do you recollect having any dealings with him?
10 A. I think around August, August '16. 11:49

11 223 Q. I see. And in relation to that, we heard evidence
12 yesterday that it was your wife Michelle who had
13 contacted him?
14 A. That's right, yes.

15 224 Q. Your wife indicated that he came to your house; is that 11:49
16 right?
17 A. That's right.

18 225 Q. In terms of when he came to your house, how were you at
19 that stage, do you recollect?
20 A. I was at a low, a very low point. 11:49

21 226 Q. Did you speak with him?
22 A. I did.

23 227 Q. Do you recollect how long that meeting went on for?
24 A. I'd say about probably half an hour I'd imagine.

25 228 Q. I see. 11:50
26 A. Somewhere around that time.

27 229 Q. Do you recollect what you spoke to him about?
28 A. I do, yes.

29 230 Q. And what was it about?

1 A. In relation to Sergeant McCabe and what I'd been
2 instructed to do and what I'd done and seeking
3 forgiveness for what I'd done.

4 231 Q. And how did the meeting with Father Kennedy conclude
5 itself? 11:50

6 A. It concluded, as I said, I felt comfort that he had
7 heard what I had to say and he blessed me and that and
8 I found great heart from it and great comfort from it.

9 232 Q. I see. Now, in terms then of meeting with Sergeant
10 McCabe, we've heard evidence that there had been 11:50
11 contact from Sergeant McCabe to your house --

12 A. Yeah.

13 233 Q. -- in terms of perhaps meeting with you.

14 A. Yes.

15 234 Q. The indication appears to be that that was before the 11:50
16 summer of 2016.

17 A. Yes.

18 235 Q. What was your reaction to meeting with Sergeant McCabe
19 at that stage?

20 A. I didn't want to meet him. 11:51

21 236 Q. Why not?

22 A. I just wasn't in the space to meet him. I felt I
23 couldn't look at him straight in the eye.

24 237 Q. I see. We're obviously aware from your wife's evidence
25 yesterday that she then went and met Sergeant McCabe on 11:51
26 two occasions --

27 A. Yes.

28 238 Q. -- before the summer of 2016. Were you aware of that?

29 A. Yes.

1 239 Q. I see. Now, September then came --
2 A. Yes.

3 240 Q. -- and there again was contact from Sergeant McCabe?
4 A. Yes.

5 241 Q. What was your attitude to meeting with him at that 11:51
6 stage?
7 A. I wasn't going to meet him. I wasn't -- it wasn't in
8 my position to meet him, I hadn't -- I simply just
9 wasn't going to meet him.

10 242 Q. And why was that? 11:51
11 A. Again, I couldn't bear to face him. I couldn't, as I
12 said, confront what I had done.

13 243 Q. In any event, as matters transpired I think that a date
14 of 20th September was arranged because Sergeant McCabe
15 was in fact going to be in Dublin? 11:52
16 A. That's right, yes.

17 244 Q. Coming up to that date, what was your attitude in
18 relation to meeting him?
19 A. I wasn't going to meet him.

20 245 Q. I see. But the day came. And we're aware that there 11:52
21 had been a family issue --
22 A. Yeah.

23 246 Q. -- the previous night. On the day of 20th September,
24 what was your attitude to meeting Sergeant McCabe?
25 A. I agreed to meet him and I agreed to tell him exactly 11:52
26 what had gone on.

27 247 Q. And why had your position changed?
28 A. Because of the night before and because of the
29 evolution I'd gone through, that I had to tell him, I

1 had to tell him the truth.

2 248 Q. I see. So in meeting Sergeant McCabe, what did you
3 intend to do?

4 A. To confess as to the campaign that I'd been directed by
5 the Commissioner to be involved in. 11:52

6 249 Q. Were you lying to Sergeant McCabe --

7 A. No.

8 250 Q. -- when you met him that day?

9 A. No.

10 251 Q. I see. Just then, Superintendent Taylor, in relation 11:53
11 to the day that Mr. Callinan retired --

12 A. Yes.

13 252 Q. -- I think your evidence is - and I'm aware that the
14 Chairman doesn't want to make decisions in relation to
15 the actual issue - but I think your evidence as -- 11:53

16 CHAIRMAN: well, I think I've enough decisions to make.
17 And I'm not entitled to step outside my terms of
18 reference. Okay, a matter of credit. But I really
19 don't see it as a matter of credit very much.

20 MS. BURNS: well, I'll just address the Chairman in 11:53
21 relation to why --

22 CHAIRMAN: No, but I'm not stopping you, Ms. Burns.
23 You may persuade me otherwise. So please, you carry
24 on.

25 MS. BURNS: The only issue that I'm attempting to 11:53
26 address --

27 CHAIRMAN: No, I'm inviting you to carry on with the
28 witness --

29 MS. BURNS: May it please you, Chairman.

1 CHAIRMAN: -- and then if you want, you can tell me
2 something at the end.

3 MS. BURNS: May it please you Chairman.

4 CHAIRMAN: All right.

5 253 Q. MS. BURNS: Just in terms of that day, did you have 11:53
6 contact with Mr. Paul Reynolds?
7 A. Yes.

8 254 Q. And why did you have contact with Mr. Paul Reynolds?
9 A. Commissioner Callinan rang me from his desk number to
10 my desk number asking me to get a letter out and 11:54
11 release Mr. Reynolds in relation to a letter that he
12 had written to the Department of Justice concerning the
13 Bandon phone tapes.

14 255 Q. And was there any other contact that you had with
15 Mr. Reynolds on that day? 11:54
16 A. Apart from that morning when Commissioner Callinan rang
17 me around, just after nine o'clock that morning. He
18 told me that he had gone and I inquired of him was he
19 gone and he said he had resigned. And he said 'Get it
20 out to Paul straightaway'. 11:54

21 256 Q. I see. So your contacts with Mr. Reynolds that day
22 were directed by Mr. Callinan is your position, is that
23 correct?
24 A. Yes.

25 257 Q. Thank you very much. There's just one further matter, 11:54
26 Chairman, that I don't want to adduce evidence of --
27 CHAIRMAN: Can I just ask you, Ms. Burns, just in
28 relation to that - and again please underline the word
29 "suppose" - so suppose that's true; what am I to take

1 of it?

2 MS. BURNS: well, in due course, Chairman, what I will
3 be submitting to the Tribunal is that this is evidence
4 from Superintendent Taylor of Mr. Callinan directing a
5 contact with a journalist that's outside the normal 11:55
6 role and reporting structures of the Press Office. And
7 that's as far as I seek to place that.

8 CHAIRMAN: All right. well, thank you for making the
9 point, I see it. Yes, thank you.

10 MS. BURNS: The only other matter of clarification - 11:55
11 it's not an evidential issue, Chairman, and I did draw
12 this to the Tribunal's attention - when Mr. McGuinness
13 was examining Superintendent Taylor he indicated that
14 Mr. Ferry, my junior counsel in the matter, had put to
15 Mr. Paul Williams, on Superintendent Taylor's behalf, 11:55
16 that Superintendent Taylor recollected a phone call
17 from Paul Williams the following week. In fact when
18 one looks at the transcript, that wasn't what was put.

19
20 I can draw the Tribunal's attention to page 89 of day 11:55
21 11 and what was put mirrors in fact what Superintendent
22 Taylor says, to the effect that his recollection was
23 that a phone call had been on the Saturday and that
24 Superintendent Taylor was of the view that an interview
25 was to take place in relation to Ms. D. So it's just 11:56
26 simply a point of clarification.

27 CHAIRMAN: well, the question you're referring to is:

28

29 "My instructions are that Superintendent Taylor

1 received a phone call on a Saturday in February -- or,
2 sorry, a Saturday in March and that the content of the
3 phone call was that you" - that's, Mr. Williams - "were
4 present in Ms. D's house and had just concluded an
5 interview. "

11:56

6
7 So in other words, he's saying that he was contacted
8 very shortly after Mr. Williams had spoken to Ms. D and
9 that Mr. Williams was still present, or giving the
10 impression that he was still present. And then the
11 answer from Mr. Williams was:

11:56

12
13 "I don't believe I called Mr. Taylor, Superintendent
14 Taylor, until the following week."

15 MS. BURNS: Yes, Judge. And I think --

11:57

16 CHAIRMAN: Is there much --

17 MS. BURNS: Chairman, I think it was that
18 Mr. McGuinness mistakenly put, or suggested to
19 Superintendent Taylor that we had put to Mr. Williams
20 that the phone call was the following week. Now, I
21 think that's Mr. Williams' evidence in relation to the
22 matter, but that isn't what we put. So it's just
23 simply to correct the record in relation to what we in
24 fact put, which accords with the evidence that
25 Superintendent Taylor has given in relation to that
26 issue.

11:57

11:57

27 CHAIRMAN: well, if you look at page 103, Ms. Burns:

28
29 "It is our instructions that to the best of our

1 client's recollection there was only one phone call,
2 which occurred on the Saturday Mr. Williams attended at
3 Ms. D's house. Mr. Williams telephoned our client,
4 Superintendent Taylor, and told him he was at Ms. D's
5 house and had interviewed her, that Maurice McCabe had 11:57
6 destroyed this person and that he was going to write an
7 article that was going to be very damaging to Maurice
8 McCabe."

9 MS. BURNS: And that's the exact point, that what was
10 put reflects the evidence of Superintendent Taylor on 11:57
11 the issue. Whereas Mr. McGuinness, when he introduced
12 this the other day, indicated that we had put that
13 Superintendent Taylor's position was that there was a
14 phone call from Mr. Williams the following week. That
15 was never put. On our side, Chairman, it's just simply 11:58
16 to correct the record.

17 CHAIRMAN: No, consistently you've said it was the
18 Saturday --

19 MS. BURNS: Yes.

20 CHAIRMAN: -- and he was there -- 11:58

21 MS. BURNS: Yes. Just in case --

22 CHAIRMAN: -- and saying 'I am speaking to you from',
23 like the vote of the Latvian jury or whatever in the
24 Eurovision Song Contest, 'I am now speaking to you from
25 Ms. D's house', yes. All right. No, I get it, the 11:58
26 point is in my mind. Thank you.

27 MS. BURNS: Thank you very much.

28 MR. MCGUINNESS: Chairman, I see Mr. Berry has arrived.

29 CHAIRMAN: Yes, Mr. Berry.

1 MR. McGUI NNESS: Chairman, might I just also say that
2 there are a number of other journalists who were
3 granted representation and in respect of whom the
4 superintendent in the witness box has given evidence
5 and I think they're probably represented by legal 11:58
6 representatives here today; Mr. Mooney, Ms. McCann and
7 Ms. Murray. And I hope I'm not leaving anyone out.
8 But it might be proper to inquire whether they wish to
9 cross-examine Superintendent Taylor.

10 CHAIRMAN: All right. So Mr. Mooney is represented by? 11:59
11 Did someone want to tell me? Mr. Mooney is represented
12 by? Does anybody know who Mr. Mooney is represented
13 by? He was granted representation, that's for certain.

14 MR. McGUI NNESS: Yes, it's Mr. Keeley I think.

15 CHAIRMAN: Hmm? 11:59

16 MR. McGUI NNESS: Mr. Keeley.

17 CHAIRMAN: Mr. Keane?

18 MR. McGUI NNESS: Keeley. I'm sorry. I'm sorry, it's
19 Mr. McAleese.

20 MR. KEELEY: Sorry, Mr. Chairman, my microphone here is 11:59
21 not really working. I'm not representing --

22 MR. McGUI NNESS: I am sorry, it's Mr. McAleese.

23 CHAIRMAN: Mr. McAleese, yes.

24 MR. KEELEY: I am not representing Mr. Mooney.
25 Mr. McAleese represents Mr. Mooney, as I understand the 11:59
26 position.

27 CHAIRMAN: And is Mr. McAleese here?

28 MR. KEELEY: I don't believe that he is. I don't
29 believe that counsel on Mr. Mooney's behalf is here

1 either.

2 CHAIRMAN: well, again the Haughey rights apply. I
3 simply give them and if people don't want to take them
4 up, as I said before, it's like being invited to a
5 dinner; if you don't want to eat the dinner, you don't 12:00
6 turn up. So he's not here?

7 MR. KEELEY: No, Mr. Chairman.

8 CHAIRMAN: All right. Then Ms. Debbie McCann is
9 represented by?

10 MR. KEELEY: Chairman, I represent Debbie McCann - 12:00
11 Michael Keeley - and I was asked if I have any
12 questions for the witness the day before yesterday and
13 I indicated that I had no questions to ask.

14 CHAIRMAN: And your basis for not asking any questions,
15 given that Debbie McCann has been centrally involved in 12:00
16 this and in particular in going up to visit Ms. D and
17 being at her house and in respect of the proposition
18 put that this was at the behest of Superintendent
19 Taylor or with the assistance Superintendent Taylor,
20 who has waived any issue in relation to journalistic 12:01
21 privilege or being identified as source of information?

22 MR. KEELEY: well, Mr. Chairman, my position on that, I
23 don't want to particularly traverse again the
24 interaction that you had with Mr. Quinn for the Irish
25 Examiner, but I think it would be fair to say that the 12:01
26 position of my clients, including Ms. McCann, would
27 mirror that in relation to the constraints that are
28 imposed upon Ms. McCann about what she can put to
29 Mr. Taylor because of her obligations regarding

1 journalistic privilege.

2 CHAIRMAN: And does she say that she actually has the
3 privilege herself and that it's not the privilege of
4 Superintendent Taylor?

5 MR. KEELEY: well, we would be -- I think at some stage 12:01
6 submissions will be given in relation to that. But
7 Ms. McCann's and my clients' position has been
8 consistent with that throughout, which is that the
9 waiver of privilege by Mr. Taylor, or indeed any other
10 witness, does not release them from the obligation of 12:02
11 journalistic privilege.

12 CHAIRMAN: well, you seem to be at odds with the
13 European Court of Human Rights there Mr. Keeley.

14 MR. KEELEY: well, we may disagree on that --

15 CHAIRMAN: well, no, it's not a question of agreeing or 12:02
16 disagreeing. I've read the decision and what it says
17 is it is a factor.

18 MR. KEELEY: It is a factor.

19 CHAIRMAN: So are you saying it is the definitive
20 factor, which the European Court of Human rights don't 12:02
21 say?

22 MR. KEELEY: I'm saying it's an extremely important
23 factor to be taken into account. And I think there are
24 two aspects to this; the first is the ethics which my
25 clients have as journalists, and secondly then the 12:02
26 legal position that they have in relation to that, upon
27 which you will obviously have to make a ruling at some
28 stage. But certainly in relation to the ethics of the
29 profession, the fact that a source has decided to

1 self-identify does not release them from that, from
2 that privilege.

3 CHAIRMAN: I'm not bound by ethics, except the ethics
4 of telling the truth and doing my best. The law is
5 what applies to every citizen --

12:02

6 MR. KEELEY: Yes.

7 CHAIRMAN: -- in this State.

8 MR. KEELEY: And as I indicated in relation to the
9 legal position, the legal position so far as my clients
10 are concerned is that that waiver, while a factor to be
11 taken into account, is not one which would, even
12 legally, release them from their obligation or the
13 rights which they have under the European Convention.

14 CHAIRMAN: You'll be aware as well, I'm sure, from
15 reading the case law that the circumstances under which
16 a journalist's privilege can apply is fact specific.
17 Do you wish to put any fact of any kind to
18 Superintendent Taylor with a view to supporting the
19 assertion that you may or may not wish to make later on
20 when your client comes to give evidence?

12:03

12:03

21 MR. KEELEY: well, Mr. Chairman, there has been pretty
22 detailed correspondence between myself and the
23 solicitor for the Tribunal in relation --

24 CHAIRMAN: No, but I've said this before - and excuse
25 me for interrupting you - but this is a public
26 Tribunal.

12:03

27 MR. KEELEY: Yes.

28 CHAIRMAN: And it's fine to write and thank you very
29 much for your submissions in that regard, but if things

1 are to be said, they sought to be said in public. I'm
2 doing everything in public. So what is your position
3 then?

4 MR. KEELEY: well, I think we have indicated throughout
5 our wish to make submissions on this particular point, 12:04
6 and my understanding was that we would do that in some
7 more detail at a later stage. But I can revisit the
8 correspondence if you wish, I have it to hand here if
9 needs be, and I think that that does set out certainly
10 some of the factual basis upon which my clients would 12:04
11 be seeking to rely in relation to this issue.

12 CHAIRMAN: All right. That is fine. But this is an
13 evidence-based process. There is a witness in the box.
14 He has spoken extensively in relation to your client.
15 There has been evidence as well from Chief 12:04
16 Superintendent Clerkin in relation to contacts between
17 Superintendent Taylor and your client. I'm simply
18 inviting you, if you wish, if it is within your
19 client's instructions, to put any question which may
20 ground a claim of privilege later on or any question 12:04
21 which you feel needs to be put with a view to
22 contradicting what may be damaging allegations or
23 inferences from facts that may be drawn from the
24 evidence of the Superintendent. Now, it's an
25 invitation, that's as far as I can put it. 12:05

26 MR. KEELEY: well, at this particular stage, as I say,
27 the position that we have in relation to that I think
28 has been set out. A number of points have been put to
29 us by Tribunal's counsel in relation to the evidence

1 that is being given and our reliance upon that and we
2 have replied in some considerable detail in relation to
3 the reasons that we have for that. I can take up the
4 Tribunal's time should you wish in going over that
5 correspondence again, but I'm not sure that's necessary 12:05
6 at this stage, I think we can have perhaps a more
7 detailed discussion on that at a stage whenever this
8 issue is arising.

9 CHAIRMAN: well, Mr. Keeley, can I take you then as
10 declining to ask any question of this witness either in 12:05
11 relation to anything damaging that may have been said
12 about your client, any inference that may be raised on
13 foot of his evidence and declining also to establish,
14 if it is possible, through the superintendent, any fact
15 which may ground a claim of privilege on a later 12:06
16 occasion when your client gives evidence; are you
17 declining?

18 MR. KEELEY: Our position in relation to that is that
19 the witness has given evidence which is favourable to
20 our client, the witness has given evidence which is 12:06
21 less favourable to our client. Because of the
22 constraints that are imposed on them because of
23 journalistic privilege, they are unable to put
24 questions to Mr. Taylor without breaching that
25 privilege. And in light of that, that is the nature 12:06
26 of -- that is the reason why we are declining to raise
27 questions of Mr. Taylor, as is the position of the
28 Irish Examiner, as you've heard.

29 CHAIRMAN: well, I'm not interested -- I'm simply

1 interested in what your view is. But you're declining
2 to ask any questions?
3 MR. KEELEY: That is correct.
4 CHAIRMAN: Yes, all right. well, that's fine. And
5 then vis-à-vis Ms. Murray? 12:07
6 MR. KEELEY: I don't represent Ms. Murray. Ms. Murray,
7 I understand is not represented by Mr. McAleese.
8 MR. McGUI NNESS: Chairman, I can say that I know, I've
9 been told by Mr. Barnes that Mr. Mooney himself was in
10 the room and he's attempting to contact his solicitor, 12:07
11 Mr. McAleese. So --
12 CHAIRMAN: All right. well, I don't want to put
13 Mr. Mooney on the spot.
14 MR. McGUI NNESS: No.
15 CHAIRMAN: I mean, he was granted representation and -- 12:07
16 MR. McGUI NNESS: Yes. well, perhaps we might return to
17 it if and when.
18 CHAIRMAN: Yes, exactly, I think that's the right thing
19 to do.
20 MR. McGUI NNESS: And in the interim, Mr. Berry is here. 12:07
21 CHAIRMAN: Yes. And, look, if somebody isn't here and
22 it's a mistake, I'm not cross. And in any event, if I
23 am, so what? But if necessary, Superintendent, we may
24 have to re-call you on that particular point. But it's
25 not going to take very long. And Mr. Berry is here. 12:07
26
27
28
29

THE WITNESS WAS CROSS-EXAMINED BY MR. BERRY AS FOLLOWS:

- 1
- 2 258 Q. MR. BERRY: May it please you Chairman. Superintendent
3 Taylor, I'm at the rear of the room and I represent
4 Ms. Gemma O'Doherty. Superintendent Taylor, I just
5 wish to ask you about the contact that you had with 12:08
6 Commissioner Callinan when he learned that a journalist
7 had called to his house to ask about penalty points
8 being wiped. You indicated on Monday morning that you
9 received a telephone call that the Commissioner was in
10 Europe, is that so? 12:08
- 11 A. That's correct, yeah, he was out of the country at the
12 time. He rang in relation to Ms. O'Doherty calling to
13 his private house and speaking to his wife.
- 14 259 Q. And you described him as being very annoyed. Now, I'm
15 going to ask you to expand on that ever so slightly. 12:08
16 Somewhat peeved? Annoyed? Very annoyed?
17 Incandescent? Can you put that on a scale please?
- 18 A. Well, he was extremely annoyed and extremely angry that
19 Ms. O'Doherty had called to his house without notice
20 and had spoken to his wife concerning penalty points. 12:08
- 21 260 Q. And I understand he gave you a direction during the
22 course of that conversation; can you tell us what that
23 direction was?
- 24 A. He informed me to make contact with management of
25 Independent News and Media to express at the highest 12:09
26 level his annoyance and what he considered a breach of
27 the code of ethics in relation to journalistic
28 engagement, that if any journalist wished to put a
29 matter to the Garda Commissioner they should use the

1 facilities of the Garda Press Office.

2 261 Q. And how did you convey that message to management in
3 INM?

4 A. I obtained a phone number for Mr. Michael Denieffe, who
5 was the Managing Director of Independent News and Media 12:09
6 and we arranged to meet in Harcourt Square in the
7 offices of Assistant Commissioner John Twomey, who was
8 also present at that meeting.

9 262 Q. Now --

10 A. A number of days later. 12:09

11 263 Q. -- you've described Mr. Denieffe as being the Managing
12 Director; I think he might've been a managing editor.
13 Are you certain about the job title?

14 A. I'm not sure of his title, I just know he held a senior
15 position within Independent News and Media. 12:10

16 264 Q. And did you put any of this communication in writing?
17 Did you write a formal letter on foot of an instruction
18 from the Commissioner?

19 A. I understand there may have been a letter issued and
20 that, I think the Commissioner may have dealt with that 12:10
21 with his legal advisors. But we attended a meeting a
22 number of days later, I think it could've been a
23 Tuesday, in Harcourt Square with Commissioner Twomey,
24 Mr. Denieffe and Mr. Denieffe brought a colleague with
25 him. 12:10

26 265 Q. I think that now Deputy Commissioner Twomey was
27 Assistant Commissioner Twomey at the time in charge of
28 the Dublin Metropolitan Region?

29 A. That's correct, yes.

1 266 Q. why, when this matter was related to press inquiries,
2 was the meeting held not in Phoenix Park where the
3 Garda Press Office is, but instead in Harcourt Square
4 with the Assistant Commissioner in charge of the Dublin
5 Metropolitan Region? 12:10

6 A. Because Commissioner Callinan was Commissioner, he is a
7 person who would be a protected person, there'd be a
8 security matter and that might ensue. Assistant
9 Commissioner Twomey, who was in charge in Dublin, would
10 be in charge of the personal protection and security of 12:10
11 Commissioner Callinan's residence.

12 267 Q. And you indicated that Mr. Denieffe may have brought a
13 colleague; was that colleague Tom Brady, the crime and
14 security correspondent for the Irish Independent?

15 A. No, it was a female colleague. I don't know her name. 12:11

16 268 Q. Can you tell me on how many other occasions during your
17 tenure as Press Officer of An Garda Síochána were you
18 instructed to arrange meetings of this nature?

19 A. That's the only one I ever had.

20 MR. BERRY: Thank you very much, superintendent. 12:11

21 A. Okay.

22 MR. MÍCHEÁL O' HIGGINS: Just arising out of that,
23 Chairman, I wonder may I ask one question before
24 Mr. McGuinness resumes?

25 CHAIRMAN: Yes. 12:11

26
27
28
29

1 THE WITNESS WAS FURTHER CROSS-EXAMINED BY MR. MÍCHEÁL
2 O'HIGGINS AS FOLLOWS:

3 269 Q. MR. MÍCHEÁL O'HIGGINS: Superintendent, you're aware,
4 are you, that Gemma O'Doherty has sought to make out a
5 case that Commissioner Callinan was somehow connected 12:11
6 with or responsible for the Tusla allegation and
7 everything surrounding it causing prejudice or hurt to
8 Sergeant McCabe. You're broadly speaking aware that --
9 this is my question: Are you aware that Ms. O'Doherty
10 provided a statement to the Tribunal in which she 12:12
11 sought to connect the Tusla allegation and the fact
12 that Martin Callinan was named as a person abusing, on
13 her case, the fixed charge penalty system?

14 A. If you're asking me direct, Mr. O'Higgins, no I'm not.
15 I haven't seen that statement. 12:12

16 270 Q. Well, can you just confirm for me that not only did
17 Martin Callinan not know about the Tusla allegation but
18 in fact you make no claim that you knew about --

19 A. No, I didn't.

20 271 Q. -- the Tusla development, isn't that right? 12:13

21 A. Yes. Never knew.

22 MR. MÍCHEÁL O'HIGGINS: Thanks very much.

23 MR. BERRY: Chairman, I'm loth to play tennis with
24 Mr. O'Higgins, but he's indicated that that was
25 contained in the statement. I wonder if that could be 12:13
26 brought up and shown please?

27 CHAIRMAN: well, I've been at this since February of
28 last year and whereas I haven't read absolutely
29 everything, I've read everything I believe that is of

1 importance.
2 MR. BERRY: Very good.
3 CHAIRMAN: And there's nothing to indicate in fact that
4 the timescale in terms of communications between Garda
5 Headquarters and Tusla or any notification of anything 12:13
6 from Tusla is such that anything of the Tusla
7 allegations could have been included in the alleged
8 instruction to Superintendent Taylor allegedly made by
9 Commissioner Callinan and affirmed by Commissioner
10 O'Sullivan. And I'm using the word "alleged" obviously 12:13
11 to indicate that I haven't made my mind up about
12 anything. But the documentary trail is not there. And
13 there's no evidence to suggest that at the particular
14 time when this alleged campaign was allegedly going on
15 that this could have been in fact included in it. So I 12:14
16 think the matter can be safely dropped.
17 MR. BERRY: May it please you, Chairman.
18 CHAIRMAN: Yes.

19
20 THE WITNESS WAS RE-EXAMINED BY MR. McGUINESS AS 12:14
21 FOLLOWS:

22
23 272 Q. MR. McGUINESS: Superintendent Taylor, could I just
24 clear up a number of matters firstly -- Mr. Barnes has
25 just passed me a note confirming that Mr. McAleese's 12:14
26 solicitors wrote to the Tribunal yesterday -- or last
27 Friday, stating that he had no questions to put to this
28 witness, Superintendent Taylor. So he appears to be
29 declining an opportunity to cross-examine.

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

If we could go to page 156 of the documents. And in the middle of this page, the Tribunal says:

"The Tribunal notes that your client spoke to various journalists on foot of the instructions as given to him by the Commissioner to encourage him to write negatively about Sergeant McCabe and to brief." 12:15

I'm not quite sure what that says. 12:15

"The Tribunal would be most grateful if your client could let it know who these journalists are. The Tribunal would also be most grateful if your client would provide to it as much detail as possible as to what your client said to each of those individual journalists and when it was said." 12:15

Now, in your protected disclosure, as we've seen, the only journalist you make reference to is Mr. Williams, in the context of receiving a call from him. So why did you not include, in your first statement to the Tribunal in March, the list of journalists? 12:15

A. The full list, is it?

273 Q. Yes. 12:16

A. Well, at the first available opportunity then, I did provide the complete list.

274 Q. Well, you didn't, you didn't provide any list of any journalist in your first statement to the Tribunal.

1 A. I don't know if I was asked that question, I can't
2 recall if --

3 275 Q. Well, this is a statement that was volunteered on your
4 part --

5 A. Yeah. 12:16

6 276 Q. -- by your solicitors dated 13th March I think. And no
7 journalists are identified. Were you having trouble at
8 that stage remembering what journalists you say you
9 briefed?

10 A. No, I remember what journalists, I remember what 12:16
11 journalists I briefed.

12 277 Q. Well, in the list that was provided in April by your
13 solicitors, not in a statement --

14 A. Yeah.

15 278 Q. -- we've obviously seen that there were nine. 12:17

16 A. Yeah.

17 279 Q. And two were omitted.

18 A. Yes.

19 280 Q. Were you having difficulty recalling at that point in
20 time what members of the press you say you briefed? 12:17

21 A. No. But I wanted to -- at the first available
22 opportunity again I provided the full and complete
23 list.

24 281 Q. Yes. Well, I'm not sure that is accurate.

25 A. Yeah. 12:17

26 282 Q. Because you omitted, obviously we've been through this
27 before with Ms. McCann and Ms. Murray --

28 A. Yeah.

29 283 Q. -- and when you were confronted with the investigators

1 in relation to their visits you confirmed that you had
2 spoken to them in advance of their trips, etcetera,
3 etcetera.

4 A. Yes, yes.

5 284 Q. But had you forgotten, is it your evidence that you had 12:17
6 forgotten that those two journalists that you were in
7 very extensive contact with --

8 A. It's not a case I'd forgotten, I just wanted to be sure
9 to be sure and when I was sure I included it.

10 285 Q. Okay. At page 158 of the Tribunal papers, if we bring 12:17
11 that up in the middle of that page, further down it's
12 noted there:

13

14 "Our client has provided us with his work diaries for
15 the relevant period and we are in a process of 12:18
16 reviewing same with the view to extracting, identifying
17 or highlighting relevant entries."

18 A. Yes.

19 286 Q. Now they're obviously your diaries, and presumably you
20 went through them -- 12:18

21 A. Yes.

22 287 Q. -- yourself?

23 A. Yes.

24 288 Q. And did you go through them with your solicitors then
25 as well -- 12:18

26 A. Yes.

27 289 Q. -- on foot of this?

28 A. Yes.

29 290 Q. And did you identify any relevant entry relating to

1 anything that you said to the Tribunal in your
2 evidence?

3 A. In relation to the press conference in Dundalk, I'd a
4 note of the time it was going to be on at.

5 291 Q. Okay. And is there anything else noted in any of your 12:18
6 diaries of any relevance to the Tribunal or to your
7 evidence to the Tribunal?

8 A. I don't think so. A lot of it was just short notes of
9 the times press conferences would be on and that kind
10 of stuff. 12:19

11 292 Q. Now can I just turn to another topic? Could we bring
12 up Mr. Wallace's statement, volume 25 page 6857. It's
13 obviously at line 149 there:

14

15 "18/12 Frank Clerkin took State phone re Roma 12:19
16 children... David Taylor said this was just trumped up
17 charges to get his phone off him."

18

19 Now have you a recollection of saying that to Deputy
20 Taylor? 12:19

21 A. Not saying trumped up charges.

22 293 Q. Pardon?

23 A. I recollect saying that Mr. Clerkin took my phone in
24 relation to the Roma children, but not trumped up
25 charges. 12:19

26 294 Q. Can we just go to 6860? And down the page. If we just
27 stop there. Deputy Taylor was -- Deputy Wallace was
28 kind enough to send us a statement that he had made
29 with Deputy Daly in relation to the matter.

1 A. Yes.

2 295 Q. Then he provided the Tribunal with a statement and he
3 provided the Tribunal with his notes.

4 A. Yes.

5 296 Q. And you know, I think, very clearly that he, amongst 12:20
6 others, believes that you told him you had sent texts
7 to the media and others. Not texts to the Commissioner
8 but texts to the media and others that was derogatory
9 of Sergeant McCabe.

10 A. No. I always made it clear and I've always made it 12:21
11 clear from day one, I sent texts concerning Sergeant
12 McCabe --

13 297 Q. Yes.

14 A. -- to Commissioner --

15 298 Q. Now perhaps Deputy Wallace was surprised that his 12:21
16 skills as a notetaker were very poor, because he
17 appears to have phoned you when this became public to
18 confront you about this suggestion, isn't that right?

19 A. I can't actually recall that, but I hear what you are
20 saying. 12:21

21 299 Q. Can we just read from line 196, it says:
22
23 "When it was made public in the Disclosures Tribunal
24 that Superintendent Taylor said that he wasn't actually
25 sending derogatory texts about Maurice to the media I 12:21
26 phoned him and asked him did he not tell Clare and I
27 that he had sent derogatory texts about Maurice to the
28 media, he said no."
29

1 Is that right?

2 A. Yeah, I never sent derogatory texts.

3 300 Q. Do you recall the phone call?

4 A. I don't. But I hear what you're saying.

5 301 Q. Right. But this is a very recent phone call, is it 12:22
6 not?

7 A. How recent?

8 302 Q. Well, you tell me when you think it happened.

9 A. A month or so ago, or six weeks ago, I can't --

10 303 Q. And is your memory that poor -- 12:22

11 A. No, it's not.

12 304 Q. -- that you don't remember Deputy Wallace --

13 A. Yeah.

14 305 Q. And he appears to be a very forceful and effective
15 deputy obviously, he raises a lot of matters in the 12:22
16 Dáil.

17 A. Yeah.

18 306 Q. But you know obviously that Deputy Daly went on
19 radio --

20 A. Yes. 12:22

21 307 Q. -- and referred to the texts, hundreds if not thousands
22 of texts, as did Mr. Clifford on the 4th, 6th and 7th
23 and it was also raised in the Dáil --

24 A. Yes.

25 308 Q. -- was it not, in the context of a demand for Nóirín 12:22
26 O'Sullivan's resignation, isn't that right?

27 A. Yes, I hear what you are saying. Yes.

28 309 Q. Pardon?

29 A. Yes. I hear what you are saying.

1 310 Q. He quotes you then as saying at line 199:
2
3 "He said he was sending texts that were derogatory
4 towards Maurice in relation to things happening or
5 being said in the media about Maurice and he was 12:23
6 sending these on to Callinan and O'Sullivan and she
7 often replied "perfect". I asked was he not sending
8 derogatory texts about Maurice to the journalists and
9 he said no. He said that he was feeding them, the
10 media, negative things about Maurice but not in text 12:23
11 form."
12 A. Exactly, yeah.

13 311 Q. Okay. But is that line at 199 correct; "He said he was
14 sending texts that were derogatory towards Maurice to
15 the Commissioners"? 12:23
16 A. No. It was updates. As I was always said, it's
17 updates in relation to the Maurice McCabe situation as
18 it played out in the public arena.

19 312 Q. So any texts you sent to the Commissioners, you say,
20 were texts merely about matters that were going on in 12:23
21 public --
22 A. Yeah.

23 313 Q. -- or in the media?
24 A. Yeah.

25 314 Q. And were not derogatory? 12:23
26 A. Yes.

27 315 Q. Okay. Now in September 2014 when you replaced your
28 phone --
29 A. Yes.

1 316 Q. -- Inspector Moroney gave evidence that none of the
2 texts from your previous phone were transferred to your
3 new phone, do you accept that?
4 A. I accept the evidence as given, yes.
5 317 Q. He also gave evidence that that was not wiped, but it 12:24
6 was returned to you, isn't that right, and that wasn't
7 challenged?
8 A. Yeah. Well, one phone is downloaded into another phone
9 that's -- I'm not a technical expert.
10 318 Q. All right. In your protected disclosure, after you 12:24
11 refer to Mr. Williams' phone call to you --
12 A. Yeah.
13 319 Q. -- you say no article was ever published.
14 A. Yes.
15 320 Q. And it seems an extraordinary thing to say because you 12:24
16 were the Press Officer and your explanation for what
17 that means is that you never saw any article, is that
18 right?
19 A. I didn't see it, no.
20 321 Q. But you were the Press Officer -- 12:25
21 A. Yeah.
22 322 Q. -- for two months afterwards, isn't that correct?
23 A. That's right, yeah.
24 323 Q. At the time of the article. And you were getting the
25 press clippings -- 12:25
26 A. Yes.
27 324 Q. -- on a daily basis during this period that we're
28 talking about, from the beginning of April until when
29 you left on the 10th June 2014?

1 A. That's right, yes.

2 325 Q. And was Mr. Williams' article not included in the press
3 clippings?

4 A. I'm sure it was, but I didn't notice it because, as I
5 say, by that time I didn't have a leadership role in 12:25
6 the Press Office.

7 326 Q. Now, your recollection of course of what Mr. Williams
8 has told you is sort of, guess where I'm phoning from?

9 A. Yes.

10 327 Q. Is it possible that that is erroneous and he might have 12:25
11 said something like guess where I've been --

12 A. No.

13 328 Q. -- and who I'm going to interview?

14 A. No. He said, guess where I am?

15 329 Q. Right. Okay. Well if we look at page 3323, this is -- 12:26
16 perhaps that's not the right page. If we just check.
17 If we just go on to, just bear with me, 3233, it's
18 there on the 6th March, do you see that?

19 A. It's not up yet.

20 330 Q. Yes. 12:27

21 A. Oh yeah, sorry, yeah.

22 331 Q. That appears to be a phone call from you to
23 Mr. Williams --

24 A. Yeah.

25 332 Q. -- on the day after he had been -- 12:27

26 A. Yeah.

27 333 Q. -- and two days before he was due to go back and on his
28 own account he did go back?

29 A. Mm-hmm.

1 334 Q. So is it possible that he could have told you on the
2 6th that he had been in the house and he was going to
3 interview her on the 8th or in a couple of days?
4 A. No. My recollection, Mr. McGuinness, has always been
5 that he rang me unsolicited to tell me, guess where I 12:27
6 am.
7 335 Q. Yes. Okay. Now in terms of learning of the outcome of
8 the visit, you had other calls with him and if we could
9 look at page 7008.
10 CHAIRMAN: Maybe just explain how the chart actually 12:27
11 works. Because obviously we only have one side of
12 this, isn't that right, Mr. McGuinness?
13 336 Q. MR. MCGUINNESS: Yes. These are outgoing contacts
14 initiated by you, isn't that correct?
15 A. That's correct. 12:27
16 337 Q. And if we just go down the page to where it begins on
17 the 12th, which is at the bottom, nearly all of these
18 calls are to a Ms. Eavan Murray?
19 A. Yes.
20 338 Q. There's a call on the 10th there to Mr. Williams? 12:28
21 A. Yeah.
22 339 Q. If we just go back up. And is it possible he told you
23 he was writing an article?
24 A. I don't recall him telling me he was going writing an
25 article. 12:28
26 340 Q. On the 10 /4?
27 MR. McDOWELL: It seems to have lasted four minutes.
28 MR. MCGUINNESS: Two minutes 12.
29 CHAIRMAN: There's one for two minutes, yes.

1 A. I can't -- I don't recall, Mr. McGuinness, him telling
2 me he was going to write an article.

3 341 Q. MR. MCGUINNESS: All right. If we go down the page, it
4 goes on from the 10th onto the succeeding days. And
5 you've a number of calls and texts to Ms. Murray there. 12:28
6 Just further down on the page, where it goes into the
7 12th, this is the day that Mr. Williams' article was
8 published in the Sunday Independent. I'm sorry, go
9 back up, Mr. Kavanagh, please. If we just go back up a
10 little bit further, thank you. Now presumably you read 12:29
11 the Sunday Independent as part of your job?

12 A. Yes.

13 342 Q. Yes. And are you saying to the Tribunal that you never
14 saw Mr. Williams' article knowing that he had phoned
15 you from the house, that you were anxious to brief the 12:29
16 Commissioners about and is it your sworn evidence you
17 didn't know of the outcome of that visit or the
18 publication of the article?

19 A. No, because this is a month after the initial call I
20 think, and I didn't think there was ever articles 12:30
21 written.

22 343 Q. You see you've told me it was your job to read the
23 papers and you'd read the Sunday Independent?

24 A. Yes.

25 344 Q. You'd get the press clippings in your capacity as head 12:30
26 of the Press Office and you now actually -- you're
27 sending texts to Ms. Murray on the 12th there at nine
28 in the morning, Sunday morning, some more calls than it
29 would appear, perhaps short ones or messages, there's a

1 text to Ms. McCann, there's a short call with
2 Ms. Murray at 17:20, there's a text then that or
3 perhaps a call you made to Mr. Williams and another,
4 another call later there. You seem to have been trying
5 to get through to Mr. Williams, isn't that right? 12:30

6 A. Yes. I see by the records, yeah.

7 345 Q. Yes. And presumably you were calling him to
8 congratulate him on the article about Ms. D?

9 A. I've always said, Mr. McGuinness, I don't recall seeing
10 the articles, because, as I said, by this stage I was 12:31
11 not in position of authority in the Press Office.

12 346 Q. You were still Press Officer, isn't that correct?

13 A. I was, yes.

14 347 Q. Now how do you say you weren't in a position of
15 authority in the Press Office? 12:31

16 A. Well, as I said, a new Commissioner had come in, I was
17 never in the Commissioner's office again so --

18 348 Q. Well, there wasn't a new Commissioner, there was an
19 acting Commissioner, isn't that right?

20 A. Well, yes, there was. 12:31

21 349 Q. Now did the acting Commissioner say anything about not
22 doing your press duties or that you'd lost your
23 authority as Press Officer?

24 A. Well, I didn't have the same access that I did have
25 before, with the previous -- 12:31

26 350 Q. Even supposing that's true for a moment, that wouldn't
27 affect your ability to read the papers, speak to the
28 three people or try and speak to the three people on
29 the day that this article is published?

1 A. Yes.

2 351 Q. Or it wouldn't stop your ability to read the papers?

3 A. No.

4 352 Q. To read your press clippings?

5 A. Yes. 12:32

6 353 Q. Isn't that right? So isn't it most likely that you saw
7 this article on the day it came out?

8 A. I have to be honest with you, I have always said,
9 Mr. McGuinness, I've no recollection of seeing the
10 articles. 12:32

11 354 Q. Okay. Now on day 74, perhaps we'd look at that, page
12 22, you were being examined on Monday --

13 A. Yes.

14 355 Q. -- about the events coming up to the PAC meeting.

15 A. Yes. 12:32

16 356 Q. At page 22, which is coming up soon, you were asked
17 about the -- I'm sorry just bear with me. I'm sorry my
18 tab has gone out, just bear with me. At the bottom of
19 page 42. You're asked then at line 22:

20

21 "Q. You go on to describe the PAC hearing. You
22 attended some of the pre-PAC meetings, is that correct?

23 A. Some, yes.

24 Q. Have you any recollection of the allegation
25 relating to Sergeant McCabe being discussed at either
26 of those meetings?

27 A. The preparation for the PAC would centre around
28 likely questions, what questions were going to be
29 fielded. The Commissioner of the day would, prior to

1 going down to the PAC, would send out a circular to all
2 relevant departments seeking briefing material in
3 relation to the topics. The topics would have been
4 notified in advance, what he was going to deal with it.
5 So they would be going through the topics, they'd be
6 going through the likely questions, there would be a
7 fire round, a rapid fire, say what questions would be
8 requested, formulating answers. There'd be also a look
9 at the members of the PAC to see who was likely to ask
10 questions. And because each member of the PAC has a
11 particular interest in particular issues, and who would
12 be likely to ask questions, so they were trying to
13 anticipate all those questions. In relation to
14 Sergeant McCabe they knew that that issue would be
15 coming up. The allegation wasn't mentioned at these
16 meetings but Sergeant McCabe, dealing would Sergeant
17 McCabe would have been a central point of going down to
18 the PAC. Because you have to understand this was the
19 first time, I think, the PAC were dealing with penalty
20 point issue in this substantive way and it was of huge
21 concern to the Garda Commissioner and the senior Garda
22 management. "

23
24 Now, you attended two of the PAC meetings, isn't that
25 correct -- pre-PAC meetings?

12:35

26 A. Yes.

27 357 Q. And was it the practice to circulate a brief to
28 everyone who was attending at the pre-PAC meetings?

29 A. No.

1 358 Q. Because we have evidence from Mr. McLindon and notes
2 from Mr. McLindon and for from Assistant Commissioner
3 Jack Nolan's notes that the 2006 allegation was
4 referred to. Have you any recollection of that?

5 A. I've no recollection of that coming up at any of the 12:35
6 meetings I was at.

7 359 Q. Well, I asked you yesterday about the notes of the
8 discipline synopsis that had been produced, and do you
9 recall the document?

10 A. Yes. 12:36

11 360 Q. And it transpires that that document was in the
12 Commissioner's office and Superintendent Frank Walsh
13 gave evidence on day 16 relating to it, and he said he
14 didn't know where it had come from. But that is a
15 document which was part of the Commissioner's PAC brief 12:36
16 for these pre-PAC meetings.

17 A. Yes.

18 361 Q. And does that help you in your recollection in that
19 regard?

20 A. Well, certain material will be circulated to a certain 12:37
21 level. It wouldn't come down to my level.

22 362 Q. Perhaps we will look at it again, it's at 7225.

23 A. Okay.

24 363 Q. This comes from page 40 of the pre-PAC brief that was
25 prepared for these meetings. If we can go down to the 12:37
26 bottom of the page. This relates to, it seems to
27 emerge from the discipline side of Garda HQ but it
28 records what's stated there and you've seen that the
29 other day obviously. But did you recall receiving that

1 information that day --

2 A. No. No.

3 364 Q. -- or having it discussed at the meeting in any way?

4 A. No.

5 365 Q. And obviously this information isn't the criminal 12:38
6 investigation file about which you've been previously
7 asked, but is it not likely that this is the source of
8 the information that you had when you were dealing with
9 Ms. McCann, Ms. Murray and Mr. Williams at later
10 periods of the year? 12:38

11 A. I've never seen this document. It was never circulated
12 to me.

13 366 Q. Were the contents discussed, as they appear to have
14 been discussed, perhaps in your presence?

15 A. As I said, Mr. McGuinness, I wasn't at every one of the 12:38
16 pre-meetings, the ones that I was at I never recall
17 this being discussed.

18 367 Q. But you must have been at the ones in the run up to the
19 hearing, which was on the 23rd?

20 A. There would be a number of meetings not just -- 12:39

21 368 Q. Yes?

22 A. But the meetings I was at, Mr. McGuinness, I have no
23 recollection of this ever being circulated, I never saw
24 it.

25 369 Q. Were you at the meeting on the 21st January 2014? 12:39

26 A. I can't recall to be honest with you.

27 370 Q. You can't recall. Now moving to another topic.
28 Yesterday in answer to Mr. O'Higgins, day 76, on page
29 46, you were asked by Mr. O'Higgins whether the first

1 person you phoned after your phones were taken, your
2 phone was taken from you on the 18th, was a journalist.
3 And you seem to be saying that in fact you phoned the
4 president of the Superintendents Association and your
5 solicitor first? 12:39

6 A. Yes.

7 371 Q. well, is that right?

8 A. Yes. I rang them on the landline.

9 372 Q. well, because your phone records were obtained
10 obviously in the context of the Clerkin report. 12:40

11 A. Yeah.

12 373 Q. And perhaps we'd look at page 2290. This is headed,
13 67, "First calls made after volunteering phone to
14 Superintendent Clerkin". And if we just go down to
15 look at the table, the first phone call there, from 12:40
16 your mobile, after the seizure, is to the journalist
17 who published the story, isn't that right, the Roma
18 story?

19 A. Yeah.

20 374 Q. Then you phone another journalist? 12:40

21 A. Yeah.

22 375 Q. You phone the other journalist, the first journalist
23 back, and then there's two phone calls to Ms. Murray as
24 well, isn't that correct?

25 A. Yes. 12:41

26 376 Q. Yes. Am I right in thinking that in fact all of the
27 texts to Ms. Murray had been or most of them had been
28 deleted, isn't that right, from the phone?

29 A. If you tell me, yeah.

1 377 Q. So is it correct to say that the first call you made
2 was to your superintendent and your solicitor?
3 A. My very first call was to my wife and then to the
4 president, general secretary and my solicitor.
5 378 Q. Now you were asked yesterday about the issue concerning 12:41
6 the Roma investigation, isn't that correct?
7 A. That's right, yeah.
8 379 Q. Would you just look at a couple of pages in relation to
9 that? You denied yesterday, I think, passing any
10 information? 12:42
11 A. Yes.
12 380 Q. And I'm just wondering are you being very specific
13 about that, because you seem to have been referring to
14 the patrol officer's report received by email?
15 A. I never received it on the day. 12:42
16 381 Q. Pardon?
17 A. I never received it on that night.
18 382 Q. Well, if we look at page 2217, this shows that you were
19 in touch with Superintendent Duff --
20 A. Yes. 12:42
21 383 Q. -- on a number of occasions --
22 A. Yes.
23 384 Q. -- on the night?
24 A. Yes.
25 385 Q. You received a text from the journalist? 12:43
26 A. Yes.
27 386 Q. You phoned the journalist back and spoke with him for
28 five minutes?
29 A. Yeah.

1 387 Q. You spoke or you sent texts again to Superintendent
2 Duff?
3 A. Yes.
4 388 Q. Superintendent Duff sent you a text back?
5 A. Yes. 12:43
6 389 Q. You phoned the journalist?
7 A. Yes.
8 390 Q. And the journalist then phoned you --
9 A. Mm-hmm.
10 391 Q. -- in the morning. But Superintendent Duff, as you 12:43
11 know, made a statement in which he said that he had
12 sent you the patrol officer's report on the night of
13 the 21st?
14 A. He didn't. Because there was an examination done of
15 his email and my email and there's no confirmation of 12:43
16 that.
17 392 Q. Well, I'm not talking about the email. Because you
18 were separately sent, were you not, the email of the
19 report on the morning of the 22nd?
20 A. On the 22nd, yes. 12:43
21 393 Q. Yes. And that happened at 10:09, isn't that correct?
22 A. That's right, yes.
23 394 Q. So according to the records, the email of the patrol
24 officer's report was sent to you in the normal way on
25 the 22nd? 12:44
26 A. Yes.
27 395 Q. But Superintendent Duff in his second statement
28 confirmed he had sent you by the phone on the previous
29 evening a copy of the patrol officer's report?

1 A. No.

2 396 Q. In any event, this chart appears to show that on the
3 22nd, if Superintendent Duff is correct and if the
4 chart is correct, having received the report the
5 previous night and receiving it by email, you spoke -- 12:44
6 the journalist spoke to you again on the morning of the
7 22nd, isn't that correct?

8 A. Yes.

9 397 Q. And I have to suggest to you that you must have passed
10 information to the journalist at some stage which led 12:45
11 to him writing the article?

12 A. No, not in relation to that matter.

13 398 Q. Well, this seems to call into question what you told me
14 on day 74 because I'd be anxious for your evidence
15 about what some of your answers mean. 12:45

16 A. Yeah.

17 399 Q. I asked you this question on day 74 at page 22, it's
18 question 93 -- now, the Roma investigation was the one
19 that you highlighted in your protected disclosure, it's
20 one of the first things mentioned? 12:46

21 A. Yes.

22 400 Q. That you were suspended in relation to it?

23 A. Yes.

24 401 Q. And you've complained about oppressive questioning and
25 oppressive custody in the course of the investigation? 12:46

26 A. Mm-hmm.

27 402 Q. But I asked you this question at question 93:
28
29 "And just to, I suppose, deal with it at this stage. I

1 think you had in fact communicated all the information
2 that you had been questioned about to a number of
3 different journalists, as outlined in the Clerkin
4 report."

12:46

5
6 And you said:

7
8 "That's correct, yes."

9
10 Now, is that answer incorrect?

12:46

11 A. Not in relation to -- not in relation to the Roma
12 situation.

13 403 Q. Okay. So that answer is not the whole truth?

14 A. Well, as I said, I never accepted the Roma, that I
15 passed any information in relation to the Roma.

12:46

16 404 Q. Well, did you think this question was unclear? It's at
17 the bottom of the page there. Again just to look at
18 that.

19 A. Well --

20 405 Q. Do you see that?

12:47

21 A. Yeah.

22 406 Q. Did you hear the question properly at the time?

23 A. I did, yes.

24 407 Q. Yeah. Now are you saying that your answer is
25 inaccurate and it's not the correct position?

12:47

26 A. Well just, in relation to the Roma, the Tallaght Roma.

27 408 Q. Given that you had such a grievance about being
28 arrested for the Roma and referring to it in your
29 protected disclosure, how is it that you came to give

1 that answer saying that, "that's correct, yes"?

2 A. As I said, it was in relation to information -- I said

3 I always maintained and I still maintain I had nothing

4 to do with the Roma passing of information.

5 409 Q. Okay. Well, we will go down to another answer in 12:47

6 relation to this. Perhaps I should be disappointed in

7 my questions, I thought they were clear, I'm sorry if

8 they weren't.

9 A. No, no.

10 410 Q. But at question 98, there's the following question, 12:48

11 it's preceded by question 96:

12

13 "Yes. And made reference to the Clerkin report,

14 investigation report, and you've seen the report, isn't

15 that correct? 12:48

16 A. Yeah.

17 411 Q. And you say "I have". I go on and say:

18

19 "Q. And I'm not criticising you in any way for

20 exercising your right to silence, you were questioned

21 about that and you didn't give any answers and you were

22 obviously advised by your solicitor in that respect.

23 A. I took certain advices at the time and I exercised

24 those advices.

25 Q. Yes. But as I understand your position, you're not

26 contesting that you did make all of those

27 communications to journalists as outlined in the

28 report?"

29

1 And you say "yes".

2 A. Yes. Oh yes. Communications. But in relation to the
3 Roma thing, I did not pass information. I accept the
4 Clerkin report outlined my communications with the
5 media, fully accept it, no issue. But in relation to 12:48
6 passing information in relation to Roma I contend I did
7 not.

8 412 Q. Okay. So is that answer "yes", is that incomplete also
9 and inaccurate?

10 A. Well, I'm happy to clarify it, Mr. McGuinness. 12:49

11 413 Q. No, no, I want your clear answer on it.

12 A. The clear answer: In relation to the Clerkin report,
13 my connection with the media, I accept that and I fully
14 accept that. But in relation to the Roma, I did not
15 pass any information in relation to the Roma. 12:49

16 414 Q. Okay. Now if you knew that to be the position and if
17 you are asserting that that is the position today, why
18 did you give this answer "yes" that you actually did
19 give?

20 A. Well, my understanding to that question was did I 12:49
21 accept the Clerkin report and I did, as regards the
22 investigation, but I'm just making the point in
23 relation to that matter.

24 415 Q. Now I haven't asked you in this series of questions
25 whether you accept the Clerkin report, because clearly 12:49
26 you don't accept the Clerkin report?

27 A. But --

28 416 Q. What I asked you was --

29 A. Yeah.

1 417 Q. -- is this answer inaccurate, incomplete and incorrect?
2 A. I'm just trying to give clarification.
3 418 Q. Is it or is it not? Is this a correct answer, "yes",
4 or not?
5 A. Well, I accept the Clerkin report. 12:50
6 419 Q. Don't say that to me again, please, because I'm not
7 asking you that. I'm asking you: Is this answer
8 recorded on the transcript, on your sworn evidence, is
9 that correct or not?
10 A. All I can say is I accepted the Clerkin report, I have 12:50
11 an issue with the Roma thing.
12 420 Q. Have you ever said to anyone that you accept the
13 Clerkin report before?
14 A. I've said it here, when I was asked Monday or Tuesday
15 here. 12:50
16 421 Q. Now if I start going through every other incident --
17 A. Yeah.
18 422 Q. -- are you going to quibble --
19 A. No.
20 423 Q. -- with any portion of them -- 12:50
21 A. No, I'm not.
22 424 Q. -- of any section of the Clerkin report --
23 A. No.
24 425 Q. -- about your disclosures?
25 A. No, I'm not. 12:51
26 426 Q. Okay. So do you accept that on many occasions you
27 engaged in systematic and continuous seeking out of
28 information from officers, documents and you circulated
29 the information and documents to many, many

1 journalists --

2 A. Yeah, I accept that.

3 427 Q. -- at a time when you're not entitled to do it?

4 A. Yeah, I accept that, yeah.

5 428 Q. Now it seems to be looking, at the totality of it, 12:51
6 therefore, acting as a Press Officer in an unauthorised
7 way, would you agree with that, at the very least?

8 A. Yes, I regret, I regret that matter.

9 CHAIRMAN: I mean, superintendent, I mean is that good
10 enough? I mean, if you take even the simplest example: 12:51
11 A lady in Dublin was burgled and details of that
12 appeared in the newspaper, and according to the
13 regulations that should never have appeared in any
14 newspaper, but why should she suddenly be splashed all
15 over the papers in relation to, you know, an extremely 12:52
16 annoying and discommoding domestic event? And that's
17 the very least example --

18 A. Yeah.

19 CHAIRMAN: -- from the Clerkin report. Never mind
20 about the Roma children being named and all the rest of 12:52
21 it.

22 A. It's extremely regrettable. It's a matter that I will
23 regret forever and ever, amen.

24 CHAIRMAN: well, that's fine, but the case you've
25 constantly been making is I was targeted in the wrong. 12:52

26 A. No.

27 CHAIRMAN: You weren't.

28 A. No, I accept that, Mr. Chairman.

29 CHAIRMAN: That's fine. It's clear.

1 A. I'm not trying to weasel my way out of it. I accept
2 it.

3 429 Q. MR. MCGUINNESS: But it did include murder cases,
4 rapes, burglaries of Ministers' houses, extradition
5 emails, critical incident reports of huge numbers, 12:52
6 isn't that correct?

7 A. That's correct, yeah.

8 430 Q. And any portrayal by you in the past to anyone as
9 having been unjustly targeted is a false portrayal,
10 isn't that correct? 12:53

11 A. I accept it. I accept it, Mr. McGuinness, yeah.

12 431 Q. Okay. Now you had some discussion with Mr. O'Higgins
13 yesterday about who not to brief --

14 A. Yes.

15 432 Q. -- and who to brief? 12:53

16 A. Yes.

17 433 Q. And you referred on a number of occasions to
18 journalists in the Garda circle?

19 A. Yes.

20 434 Q. And is that something that you say was discussed with 12:53
21 Commissioner Callinan?

22 A. I'm not saying that it would be discussed, but it would
23 have been known that the journalists who would attend
24 regular Garda events were the same cohort all the time.

25 435 Q. So again, I am just trying to achieve a degree of 12:53
26 certainty here.

27 A. Yeah.

28 436 Q. Are you saying it wasn't discussed with Commissioner
29 Callinan?

1 A. No, it wasn't discussed.

2 437 Q. No. Okay.

3 A. Yeah.

4 438 Q. And therefore it wasn't discussed with Commissioner
5 O'Sullivan as well? 12:54

6 A. No.

7 439 Q. Okay. But was it up to you then to decide who were the
8 journalists in the Garda circle?

9 A. Well, yes. As I said, I executed the direction.

10 440 Q. Yes. And whatever direction you say you received it 12:54
11 wasn't connected to any identified group of
12 journalists, either by name or number?

13 A. No.

14 441 Q. Okay. So, who do you identify as having been in your
15 view of being journalists in the Garda circle? 12:54

16 A. The 11 that I have named.

17 442 Q. The 11 that you've named?

18 A. Yeah.

19 443 Q. And no more?

20 A. No more. 12:54

21 444 Q. Yeah. But you see, you've said on a number of
22 occasions, both through your solicitor in his letters
23 and in your statements to the Tribunal, that you can't
24 be definitive about who you briefed, so your latter
25 there now, is that accurate; that it's the 11 and no 12:55
26 more?

27 A. Well, it's the 11 that I can personally recall.

28 445 Q. Okay. So there still could be more whom you regarded
29 as being in the Garda circle of journalists?

1 A. Well, the Garda circle of journalists isn't that big.
2 Like, it's incorporated in that list.

3 446 Q. Well, it may be part of it but what I'm asking you to
4 help me in this regard, because we want to make the
5 fullest inquiry possible into your protected 12:55
6 disclosure --

7 A. Yes.

8 447 Q. -- is there anyone else that you would like to add in
9 at this stage as being --

10 A. No. 12:55

11 448 Q. -- within the Garda circle of journalists not on the
12 list and whom you briefed?

13 A. No.

14 449 Q. No.

15 CHAIRMAN: The evidence I have had from the Garda Press 12:55
16 Office is there's 700 actual individuals on the list.

17 A. Yeah, but they are on a mailing list, Chairman. That
18 would receive all the --

19 CHAIRMAN: Even if you cut it down there's certainly
20 more than 11. So there's dozens and dozens I would 12:55
21 suppose. You're clear in your answer anyway?

22 A. Yes.

23 CHAIRMAN: That is grand.

24 450 Q. MR. McGUINESS: And there has been some focus
25 obviously on Commissioner O'Sullivan's position 12:56
26 vis-à-vis the investigation and vis-à-vis her husband,
27 isn't that correct?

28 A. Yes.

29 451 Q. And it does seem to be, and have been, a bit of a

1 concern of yourself and your wife that the
2 Commissioner's husband ended up investigating you?

3 A. Yes.

4 452 Q. Is that a concern to you?

5 A. Yes. 12:56

6 453 Q. Does that in any way relate to any bit of your
7 protected disclosure?

8 A. No.

9 454 Q. No. And the evidence from Chief Superintendent Clerkin
10 was that he was appointed by the assistant 12:56
11 commissioner, do you accept that evidence?

12 A. I accept that, yes.

13 455 Q. I think you've accepted in evidence that you knew that
14 he commenced his investigation in August 2014?

15 A. Yes. 12:56

16 456 Q. Two years before you made your protected disclosure?

17 A. That's right, yes.

18 457 Q. And that he, as he was entitled to do, chose the
19 detective superintendent who was serving with him in
20 Ballymun, who was Detective Superintendent McGowan, 12:57
21 isn't that right?

22 A. That's right, yes.

23 458 Q. And have you any evidence, at all, to suggest that
24 Commissioner O'Sullivan appointed her husband to
25 investigate you for any reason? 12:57

26 A. No. I said the point I was always making was that
27 Commissioner O'Sullivan had removed me from the Press
28 Office and that her husband was investigating,
29 conducting my activities during and after the Press

1 Office. And I consider it a conflict in that matter.

2 459 Q. Now do you accept that from the timing of the
3 investigation commencing in August 2014, there had been
4 no suspicion related to you and your conduct in leaking
5 material to journalists? 12:58

6 A. Yeah. Yes.

7 460 Q. So you were interviewed by Chief Superintendent Clerkin
8 on the 21st November 2014, isn't that correct?

9 A. That's right.

10 461 Q. And suspicion only fell on you after the analysis of 12:58
11 your mobile phones had been conducted, after they had
12 been seized in December --

13 A. Yeah.

14 462 Q. -- 2014, isn't that right?

15 A. That's right. 12:58

16 463 Q. Okay. So nobody could have the foresight or the
17 planning or the guile to appoint someone to an
18 investigation in those circumstances with a view to
19 doing you down, isn't that right?

20 A. That's correct. 12:58

21 464 Q. Now, you've referred to Commissioner Callinan there,
22 just in the context of removing him from the Press
23 Office. I think you told Deputy Daly that when you met
24 her and Deputy Wallace that, she took notes and she
25 noted that: 12:59
26

27 "Superintendent Taylor talked about how he got the job
28 at the Press Office, how former Commissioner Callinan
29 picked him. He was flattered that he'd been

1 hand-picked for this role."
2
3 Is that right?
4 A. As I said, I hadn't applied for the role,
5 Mr. McGuinness. 12:59
6 465 Q. Well, did you either say to her or imply to her that
7 Commissioner Callinan had picked you for the role?
8 A. I didn't -- as I say, I didn't say those words, but as
9 I said I would have been picked by him for that
10 position. 12:59
11 466 Q. But did you tell her that you were flattered that you
12 had been hand picked for it?
13 A. I didn't say the word flattered, no.
14 467 Q. Pardon?
15 A. I never said the word flattered. 12:59
16 468 Q. You disagree with that. Were you flattered?
17 A. Are you saying did I enjoy the job? Yes, I did.
18 469 Q. I mean, there's obviously a great deal of evidence and
19 this isn't a criticism obviously of you, a great deal
20 of evidence that you appeared to put a lot of energy 13:00
21 into your job, you enjoyed the job as Press Officer?
22 A. Yes.
23 470 Q. And it seems clear from your evidence in many respects
24 that you became attached to Commissioner Callinan as
25 well, is that correct? 13:00
26 A. I don't know, do you mean "attached"?
27 471 Q. I mean, you seem to have regarded it as a great
28 traumatic event for him and for you when he retired in
29 March 2014?

1 A. It was a very -- yeah.

2 472 Q. Pardon?

3 A. It was a very big event, yes.

4 473 Q. Yes. And it seemed to have affected you greatly, on a
5 sort of personal level and professionally at the time? 13:00

6 A. Yes.

7 474 Q. Okay. And you seem in your own mind to have linked
8 your move from the Press Office with this issue over
9 the Bandon letter being briefed to Mr. Reynolds?

10 A. Definitely a factor. 13:01

11 475 Q. Yeah. Okay. So if that's right, on your own account,
12 your moving from the Press Office had nothing to do
13 with the smear campaign or knowing too much about the
14 smear campaign, isn't that right?

15 A. Well, I'm saying the Bandon letter was a factor. AS I 13:01
16 said, the decision of Commissioner O'Sullivan to move
17 me is a matter that she can state why.

18 476 Q. But it disappointed you?

19 A. It did, yes.

20 477 Q. That you were moved? 13:01

21 A. Yes.

22 478 Q. And it disappointed you that you weren't promoted?

23 A. No, no.

24 479 Q. Did you not have a grievance about not being promoted?

25 A. No. 13:01

26 480 Q. Like a lot of the other superintendents --

27 A. No.

28 481 Q. -- who when they left they left on promotion?

29 A. Yeah. But, as I said, I didn't have a grievance about

1 promotion.

2 482 Q. well, were you expecting to be promoted? Had you
3 applied for a promotion at any stage?

4 A. No.

5 483 Q. Have you ever applied for promotion from your position 13:01
6 as superintendent?

7 A. Yes.

8 484 Q. When did you do that?

9 A. Last year.

10 485 Q. Last year? 13:02

11 A. Yes. During my time in the Press Office I wouldn't be
12 qualified to, I hadn't obtained the requisite number of
13 years in the rank to apply for a promotion during my
14 time in the Press Office.

15 486 Q. Okay. And did you think that in the light of what you 13:02
16 knew you were doing when you were out of the Press
17 Office that you were a person who was suitable for
18 promotion then?

19 A. well, I put myself forward and by that time I had been,
20 I had returned to work and all other matters had been 13:02
21 dealt with.

22 487 Q. You think you had a clean enough slate to feel that you
23 could go for promotion?

24 A. I put myself forward to the policing authority and it
25 was a matter for them to make a decision. 13:02

26 488 Q. Okay. But I'm just concerned about the issue of
27 promotion and Commissioner O'Sullivan. I mean, I don't
28 understand the system of promotion, but you don't apply
29 to the Commissioner then?

1 A. No.

2 489 Q. And now there's a new system in any event, isn't that
3 right?

4 A. Yes, yeah.

5 490 Q. And in terms of being moved out of the Press Office, 13:03
6 there are perhaps many reasons why you did what you
7 did, but I don't want to, I don't want to apply any
8 particular adjective to what you did thereafter, but
9 one way of putting it, as Mr. O'Higgins used the
10 phrase, was that you were running an alternative Press 13:03
11 Office afterwards, but you were doing it in a very
12 different manner, obviously, isn't that right?

13 A. I remained in contact with the media afterwards.

14 491 Q. But I mean, you obviously enjoyed your time in the
15 media -- with the media when you were Press Officer? 13:03

16 A. Yes, I enjoyed it.

17 492 Q. And you made a lot of connections and attachments there
18 also, isn't that right?

19 A. That's correct, yes.

20 493 Q. And you wanted to continue those? 13:03

21 A. Yes.

22 494 Q. And you were happy to do so in this, what must be
23 admitted to be a grossly improper way?

24 A. I accept that.

25 495 Q. Okay. And the criminal investigation then and the 13:04
26 Commissioner's part in it, in having her husband on the
27 investigating team, you thought that was improper?

28 A. Yes, I did.

29 496 Q. Yeah. So this was, as it were, a second issue relating

1 to Commissioner O'Sullivan, which led you to, I
2 suppose, a degree of negativity, to put it mildly in
3 relation to her and her husband, isn't that right?
4 A. Well, I thought it was -- as I said, her husband being
5 placed on my investigation was a conflict. 13:04
6 497 Q. And in the context of the protected disclosure that you
7 came to make you did go to the media --
8 CHAIRMAN: I wonder would people please calm down.
9 would you, please.
10 498 Q. MR. McGUINESS: You did go to the media in October -- 13:05
11 well, you went to the media, you went to Mr. Clifford
12 in the summer in fact, isn't that correct?
13 A. That's right, yes.
14 499 Q. And you went to Deputy Daly and Deputy Wallace?
15 A. They came to me. 13:05
16 500 Q. They came to your house, you let them into your house,
17 we won't go over that again.
18 A. Yeah.
19 501 Q. And you were happy to propagate your version of what
20 had happened and what was occurring to you as a result 13:05
21 of what Commissioner O'Sullivan was doing, isn't that
22 right?
23 A. I was just pointing out that her husband was part of
24 the investigation.
25 502 Q. Yeah. And at the time you made the protected 13:05
26 disclosure, which you obviously could have made years
27 ago, perhaps, you were making it in the context of
28 expecting a knock at the door from some of your
29 colleagues to perhaps charge you?

1 A. That's a possibility, yeah.

2 503 Q. Okay. Thank you.

3 A. Thank you.

4

5 WITNESS WAS THEN QUESTIONED BY THE CHAIRMAN,

13:05

6 AS FOLLOWS:

7 504 Q. CHAIRMAN: I just have very few questions,
8 superintendent, before we get away for lunchtime, if
9 that is all right. The first thing I wanted to ask you
10 about was this: The first time that there was any
11 question put to anybody as to what allegedly the smear
12 was against Martin Callinan was to Andrew McLindon, the
13 Head of Communications, and it was to the effect of
14 what you have said today?

13:06

15 A. Yeah.

13:06

16 505 Q. CHAIRMAN: That you were being asked by Commissioner
17 Callinan to point out that there had been an
18 investigation, that a file had been sent to the DPP in
19 relation to Maurice McCabe, and that in consequence of
20 that he had a sense of grievance or bitterness against
21 the Gardaí --

13:06

22 A. Yes.

23 CHAIRMAN: -- and would have been motivated by improper
24 motives, like revenge or whatever.

25 A. Yeah.

13:06

26 506 Q. CHAIRMAN: Is that the full extent of it?

27 A. Yes.

28 507 Q. CHAIRMAN: Because the reference to our investigators
29 to making reference to the alleged sexual offence and

1 that there's no smoke without fire would seem to
2 indicate that it was much more than that?

3 A. No. That's all, that was the parameters of my
4 instruction.

5 508 Q. CHAIRMAN: And were you supposed to mention that it was 13:07
6 an alleged sexual assault?

7 A. Well, I always said it was in relation to a sexual
8 offence that he had been investigated in 2006.

9 509 Q. CHAIRMAN: Where does the thing "there's no smoke
10 without fire" come into it? 13:07

11 A. I can't say how that terminology came in. But it
12 wasn't related -- that would relate back to his
13 motivation in bringing these matters to the public
14 arena.

15 510 Q. CHAIRMAN: This is a question that no one has asked 13:07
16 you, certainly in a direct fashion, but: We've looked
17 at all the newspapers --

18 A. Yeah.

19 511 Q. CHAIRMAN: -- and apart from Paul Williams, there's
20 nothing -- 13:07

21 A. Yeah.

22 512 Q. CHAIRMAN: -- not a sniff to indicate that Maurice
23 McCabe was embittered in consequence of an
24 investigation that he had to face. So whatever the
25 plan was, if there was a plan, it wasn't working. So 13:07
26 did Commissioner Callinan ever come back to you and say
27 look the plan isn't working, here plan B we've got to
28 do the following?

29 A. He was just very concerned at, as I say, the media were

1 still writing positively in relation to Sergeant McCabe
2 and how is this happening, like I mean. But I said we
3 were briefing the media in relation to his motivation.
4 513 Q. CHAIRMAN: But did he ever say look, I'm going to have
5 a go myself or -- 13:08
6 A. No, he never.
7 514 Q. CHAIRMAN: -- you're clearly not doing the job you were
8 tasked to do? You know the way if a jobs book comes
9 out and you're asked to do the following job and
10 they're not marked off as being done correctly your 13:08
11 sergeant or whatever when you were a garda would be
12 annoyed, anything like that?
13 A. Nothing like that. They were just concerned all the
14 time as the story wasn't going away and he was
15 expressing that to me. 13:08
16 515 Q. CHAIRMAN: Just that?
17 A. Yeah.
18 516 Q. CHAIRMAN: There was no plan B?
19 A. There was no plan B.
20 517 Q. CHAIRMAN: Make it worse? 13:09
21 A. No.
22 518 Q. CHAIRMAN: Like no smoke without fire?
23 A. No.
24 519 Q. CHAIRMAN: That he must have done it kind of stuff?
25 A. Yes. 13:09
26 520 Q. CHAIRMAN: No?
27 A. No. There was no. No.
28 521 Q. CHAIRMAN: All right. You indicated you were collating
29 your work diaries, I know Mr. McGuinness has referred

1 to page 158, are you certain there's nothing in them
2 that can assist us any further?

3 A. I'm almost certain, yeah.

4 522 Q. CHAIRMAN: would you mind if we had a look at them?
5 A. Yes. They're with my solicitor at the moment. 13:09

6 523 Q. CHAIRMAN: Okay. The other thing I wanted to ask you
7 about was this: You had a problem with Nóirín
8 O'Sullivan and what was the problem with Nóirín
9 O'Sullivan?

10 A. Well, I was removed from the Press Office -- 13:09

11 524 Q. CHAIRMAN: I know, but people are removed.

12 A. Yes.

13 525 Q. CHAIRMAN: I mean, you could have been sent to
14 Donegal --

15 A. Yes. 13:09

16 526 Q. CHAIRMAN: -- to westmeath, I'm not saying any of these
17 places are anything other than wonderful places, but
18 you could have been put in a situation, you're there to
19 serve --

20 A. Yeah. 13:09

21 527 Q. CHAIRMAN: -- you're moved, you could be moved at a
22 moment's notice. What's your problem with Nóirín
23 O'Sullivan?

24 A. I was removed from a job that I felt I was doing a good
25 job at. 13:10

26 528 Q. CHAIRMAN: well, I mean, that happens to lots of
27 people.

28 A. Yeah.

29 529 Q. CHAIRMAN: why do you particularly have to become

1 bitter about it?

2 A. I'm not saying I'm bitter, Mr. Chairman. But as I say
3 it was, it was a public move from a high profile
4 position to a less profile position.

5 530 Q. CHAIRMAN: What does high profile matter to you? Why 13:10
6 does that matter to you?

7 A. Well, as I said, within the Garda family it was clearly
8 seen as a move sideways.

9 531 Q. CHAIRMAN: Do you think there actually was anything
10 unfair about the Clerkin investigation into your 13:10
11 activities which revealed matters which, according to
12 the investigators of these rapes, these murders --

13 A. Yeah.

14 532 Q. CHAIRMAN: -- everything that else, that you revealed
15 to journalists privately not being the Press Officer, 13:10
16 were the kind of things that shouldn't have been
17 revealed to the press because they were investigating
18 investigations ongoing? Do you think there was
19 anything wrong with the Clerkin investigation?

20 A. No, I fully accept it. I fully accept it. 13:11

21 533 Q. CHAIRMAN: Do you think that Clerkin did a good job?
22 Do you think he was fair?

23 A. I think he did a professional job, yes. I have no
24 difficulty with it.

25 534 Q. CHAIRMAN: You've read the file, I'm sure? 13:11
26 A. Yes, I fully accept that, Mr. Chairman.

27 535 Q. CHAIRMAN: As regards any of the people from whom you
28 were seeking assistance or even sympathy did you say
29 to -- at the time when you were under investigation,

1 did you say to any of them, oh by the way, I have to
2 tell you, because it's only fair that you should know
3 before you do anything on my behalf, I actually did
4 everything except, as you now say, the Roma children --
5 A. Yes. 13:11

6 536 Q. CHAIRMAN: -- that Chief Superintendent Clerkin was
7 investigating me for?
8 A. As I said, I never asked anybody to do anything for me,
9 but I mean I fully accept, as I said, the matters. Do
10 you know, like, I mean I fully accept my own 13:11
11 responsibilities, Mr. Chairman.

12 537 Q. CHAIRMAN: I know. But you were breaking the Garda
13 Code left, right and centre --
14 A. Yeah.

15 538 Q. CHAIRMAN: -- I mean, every single day almost -- 13:12
16 A. Yeah.

17 539 Q. CHAIRMAN: -- for a period of over a year?
18 A. Well, that's extreme regret to me. And as I said, I
19 have to live with that long after this Tribunal is
20 over. 13:12

21 540 Q. CHAIRMAN: well, what about the people who are living
22 with the press accounts or the investigations that were
23 potentially compromised by you going to the newspapers
24 and revealing details that were outside the Code?
25 A. Well, as I said, it's regrettable to me. I've let down 13:12
26 my standards and I have to live with that.

27 541 Q. CHAIRMAN: Yes. But again, the reason I'm asking you
28 this is not to put you on the spot, superintendent,
29 please don't misunderstand.

1 A. No.

2 542 Q. CHAIRMAN: what I am worried about is this: A number
3 of people have described you as ringing the Press
4 Office and of you being bitter. Now I suppose bitter
5 is a word that is perhaps -- 13:12

6 A. Yeah.

7 543 Q. CHAIRMAN: -- you know, there's degrees of bitterness,
8 just as there are degrees of saltiness, but they
9 described you as being bitter, and what I am failing to
10 understand is why were you bitter if you had a 13:12
11 realisation that what you were doing was wrong and were
12 being investigated in fact correctly?

13 A. It's just a manner of, I was removed and the manner in
14 which it was portrayed. Like, I mean, it was
15 definitely a reflection on my standing. 13:13

16 544 Q. CHAIRMAN: I know, but it was right, wasn't it? Do you
17 not realise that?

18 A. Well, as I said, I respect the right of the
19 Commissioner to move anybody.

20 545 Q. CHAIRMAN: No, but it was correct. 13:13

21 A. I accept that the investigation, yes.

22 546 Q. CHAIRMAN: I mean, this thing with the press would have
23 gone on. I mean, you might thank them for it, perhaps,
24 until now; investigations could have been compromised,
25 cases not have been brought. I mean, are you not 13:13
26 grateful to Chief Superintendent Clerkin for stopping
27 you in your tracks?

28 A. Well, as I said, I fully accept that I accept my
29 culpability and I regret that immensely.

1 547 Q. CHAIRMAN: There was just two other matters then,
2 superintendent. The first is in relation to Andrew
3 McLindon. Now I have been told that the two of you
4 didn't get on and look --
5 A. That's not true. 13:13

6 548 Q. CHAIRMAN: I know, but if it be the case I think in any
7 close relationship people sometimes don't get on,
8 people get on well, and then there are people who are
9 particular friends of yours.
10 A. Yes. 13:14

11 549 Q. CHAIRMAN: Now let's suppose you weren't a particular
12 friend. But in fact did you -- he thinks you were
13 bypassing him and going direct to the Commissioner and
14 leaving him in the loop and he said to me that he was
15 playing the long game, which was that eventually there 13:14
16 was going to be change and he would be able to get in,
17 maybe his ideas might be accepted in Headquarters?
18 Nothing illegitimate about that, by the way.
19 A. When Andrew came in I fully respected Andrew's
20 position, I fully kept him briefed, and I actually 13:14
21 brought him down to court on the first day to show him
22 how the court systems work, because he'd never worked
23 in the criminal justice system before. So I was always
24 -- you know, it was the first time I ever worked with a
25 civilian boss. So, as I said, I welcomed Andrew with 13:14
26 open arms.

27 550 Q. CHAIRMAN: Did you find him likeable enough?
28 A. He's a very likeable individual, yeah.

29 551 Q. CHAIRMAN: I was just wondering then why you described

1 him in a text as a rodent?

2 A. You send texts and regret them pretty quickly
3 afterwards. I suppose in the sense I was moved and he
4 had gone on holidays and I thought he would have told
5 me you're going to be moved. He would have known that 13:15
6 before I was -- because he was my direct boss.

7 552 Q. CHAIRMAN: Okay. Then the last matter is this: The
8 premise that a number of people understood, you say
9 incorrectly and I appreciate I've heard your evidence
10 and I will consider it very carefully, superintendent, 13:15
11 the premise that a number of people understood in
12 relation to why you were moved and why you were under
13 investigation was because allegedly there were texts
14 which needed to be destroyed, which could be destroyed
15 when your phones were seized -- 13:15

16 A. Yeah.

17 553 Q. CHAIRMAN: -- and brought to Garda Headquarters, and
18 wiped or improperly dealt with, and that in consequence
19 of that, any, I suppose, evidence on the ground,
20 physical evidence, such as we have used, such as my 13:16
21 reference to the rodent example --

22 A. Yeah.

23 554 Q. CHAIRMAN: -- and the text and Andrew McLindon would
24 thereby be erased. I want to ask you the
25 straightforward question, is this: Were there in fact 13:16
26 any texts that were worth destroying in the sense of
27 implicating Martin Callinan and Nóirín O'Sullivan in
28 any kind of plot against Maurice McCabe?

29 A. No.

1 CHAIRMAN: All right. That is fine. I am very
2 grateful for your help. Thank you. So it is an hour's
3 time then.

4
5 THE HEARING THEN ADJOURNED FOR LUNCH

13:16

6
7
8 THE HEARING RESUMED, AS FOLLOWS, AFTER THE LUNCH

9
10 MS. LEADER: The next witness, sir, is Alan Shatter.

14:21

11 MS. BARRINGTON: Thank you, Chairman. My name is
12 Eileen Barrington. I appear with Mr. Cathal Murphy on
13 behalf of Mr. Shatter. I am instructed by Gallagher
14 Shatter solicitors.

15 CHAIRMAN: Thank you very much.

14:22

16
17
18 MR. ALAN SHATTER, HAVING BEEN SWORN, WAS DIRECTLY
19 EXAMINED BY MS. LEADER AS FOLLOWS

20 MS. LEADER: Mr. Shatter's statement to the Tribunal is
21 in volume 6, page 1676 of the materials and there's
22 also relevant material in volume 26 from page 7219
23 onwards.

14:22

24 555 Q. Now, Mr. Shatter, if you would confirm to the Tribunal
25 that you were Minister for Justice from 9th March 2011
26 to May 2014?

14:23

27 A. Yes, that's correct.

28 556 Q. And I think during your time as Minister you were
29 dealing with two strands of issues which were raised by

1 Sergeant McCabe?

2 A. Yes, that's right.

3 557 Q. And just broadly speaking, those issues were policing
4 in Cavan-Monaghan, as I understand it --

5 A. Yeah. 14:23

6 558 Q. -- and the second lot of issues were the penalty points
7 issues?

8 A. Yes, that's right.

9 559 Q. Now during your time as Minister you actively tried to
10 advance and deal with these issues in a number of ways? 14:23

11 A. Yes, that's correct.

12 560 Q. And just putting those ways into categories, I suppose
13 you engaged in correspondence with Ms. Murray from time
14 to time, is that correct?

15 A. In relation to the penalty points, the ticket charge 14:23
16 issue, there was direct correspondence throughout from
17 Sergeant McCabe is my recollection. In relation to the
18 issues in relation to Bailieboro, there was
19 correspondence from Sergeant McCabe or through his
20 solicitors and through what was known as the 14:24
21 confidential recipient, Mr. Oliver Connolly, at the
22 time.

23 561 Q. All right. And you in turn corresponded with those
24 people?

25 A. And we would have corresponded with Mr. Connolly in 14:24
26 response to an issue that first came to us through him,
27 we corresponded directly to Sergeant McCabe's
28 solicitors subsequently and unfortunately over a period
29 of many months they failed to respond to a series of

1 letters we sent them. And because of my concerns about
2 issues around the ticket charge issue and as a result
3 of correspondence we received from Sergeant McCabe, I
4 arranged that an official of the Department of Justice,
5 Mr. Michael Flahive, engage in correspondence with
6 Sergeant McCabe and that correspondence, to my
7 recollection, went on from in or about December of
8 2012, I think through to December of 2013, I think that
9 was the date profile.

14:25

10 562 Q. Okay. And I suppose you were also dealing directly
11 with other government departments in relation to
12 Sergeant McCabe?

14:25

13 A. Yes. Sergeant McCabe on the ticket charge issue first
14 communicated his concerns to the Taoiseach's department
15 and the Department of Transport and that would have
16 been in the summer of 2012. And that correspondence
17 then was furnished to the Department of Justice in
18 September of 2012.

14:25

19 563 Q. All right. Now I think naturally, because the issues
20 concerned policing, you would have spoken and engaged
21 in correspondence to the Commissioner of An Garda
22 Síochána, who at that time was Commissioner Callinan?

14:25

23 A. Yes, that's right.

24 564 Q. All right. Now, the Tribunal doesn't want to examine
25 those issues, but in relation to the Cavan Monaghan
26 issues, they were matters that were dealt with by
27 Mr. Justice Kevin O'Higgins, isn't that correct?

14:26

28 A. Yes, that's correct.

29 565 Q. And he found in his report that you had dealt with the

1 matters appropriately and proportionately and
2 correctly, isn't that right?

3 A. Yes. He said I dealt with them variously
4 appropriately, promptly, proportionately, reasonably.
5 Unfortunately, prior to Mr. Justice Kevin O'Higgins 14:26
6 conducting a very careful and detailed commission of
7 investigation, the exact opposite conclusions were
8 reached by Mr. Guerin --

9 566 Q. All right.

10 A. -- without, of course, consulting with me or talking to 14:26
11 me.

12 567 Q. We will leave that.

13 CHAIRMAN: Mr. Shatter, that actually has nothing to do
14 with the case. So I hear what you say, but I am
15 ignoring it. Thanks. 14:26

16 568 Q. MS. LEADER: Now, not to get too involved in how the
17 penalty points issue was dealt with, I think you were
18 instrumental in having the matter examined by Assistant
19 Commissioner John O'Mahoney, is that correct?

20 A. Well, what happened was in October 2012 correspondence 14:27
21 with the various allegations made by Sergeant McCabe
22 were sent to the Garda Commissioner.

23 569 Q. Yes.

24 A. Sergeant McCabe, in his correspondence was very anxious
25 to protect his anonymity and said very much made the 14:27
26 case that in the matter being addressed he wished his
27 anonymity to be preserved. So in writing to the Garda
28 Commissioner the information and the allegations as
29 received were all passed on, but my officials were

1 instructed at all times to respect Sergeant McCabe's
2 request for anonymity and I continued to do so.

3 570 Q. All right. And I think later on in 2013 you referred
4 the matter to the Inspectorate, once you had
5 Commissioner O'Mahony's final report, isn't that 14:28
6 correct?

7 A. Well, we had the report from Commissioner O'Mahony in
8 March, the professional, the PSU section of the Gardaí,
9 the standards section also produced a report in April
10 and both reports would have been published on 15th May 14:28
11 2013. And at the same time, because I had some
12 particular concerns arising out of the nature of the
13 decision-making by An Garda Síochána in the context of
14 some of the substantive decisions made and because I
15 was anxious to ensure there was an independent review 14:28
16 of the recommendations of Chief Superintendent
17 O'Mahony, we passed on the report to the Garda
18 Inspectorate and requested that it report.

19 571 Q. All right. Now, I first of all want to examine a
20 little bit the alleged non-cooperation with the 14:28
21 O'Mahony inquiry --

22 A. Yes.

23 572 Q. -- and Sergeant McCabe. Now, first of all, there was a
24 letter circulated this morning which is in redacted
25 format which you supplied to the Tribunal and I think 14:29
26 it's at page, it should be around 7266 of the materials
27 -- 7283, sorry, of the materials, if it could be
28 brought up.

29 A. Yes, I have a copy of it here.

1 573 Q. Yes. So we're going back to December 2012 at this
2 stage and the O'Mahony investigation had started, isn't
3 that right?

4 A. That's correct, yes.

5 574 Q. All right. And I think there had been some sort of 14:29
6 naming of individuals in the Dáil in the end of
7 November and the beginning of December 2012 with regard
8 to the fixing of penalty notices?

9 A. Well, a number of events occurred in and around that
10 period. Towards the end of November 2012 I'd have 14:29
11 received an interim report from Chief Superintendent
12 O'Mahony which was essentially to fill me in on what
13 was happening in the context of addressing the
14 allegations made and indicated to me some initial
15 observations on issues that had arisen. There was, in, 14:30
16 I think in November, and then repeated in December of
17 2012, some individuals were named in the Dáil by
18 members of the Houses of the Oireachtas as being the
19 beneficiaries of the termination of penalty points and
20 ticket charges, and the individuals' names coincided 14:30
21 with names in the documentation that I'd received
22 through Sergeant McCabe. I had very particular
23 concerns that individuals who had done no wrong were
24 being publicly pilloried in the Dáil and they were
25 being mentioned in the media and I also had concerns 14:30
26 because the TDs who were raising this issue seemed to
27 be, firstly, some of them of the belief that in no
28 circumstances could penalty points or ticket charges be
29 terminated and there was very specific provisions in

1 that regard, and it was also clear from the initial
2 report I'd received that some of the allegations made
3 were mistaken.

4
5 So arising out of that, arising out of, I think, the 14:31
6 exchanges that took place in the Dáil on 11th December
7 and the report of those exchanges, a letter would have
8 been received from, a very short letter from Sergeant
9 McCabe more or less asserting that all of the
10 allegations he's made were accurate. 14:31

11
12 Now, I was concerned at the way in which this matter
13 was developing and Michael Flahive, who is an
14 assistant, who then was an assistant secretary general
15 in the department and who headed up the Garda or 14:32
16 policing section of the department, corresponded
17 directly with Sergeant McCabe. And I asked him to
18 reply to the letter we had received to explain in as
19 detailed a fashion as we could some of the issues that
20 had arisen arising out of the interim report, to urge 14:32
21 Sergeant McCabe to await the conclusions of the full
22 investigation being conducted by Chief Superintendent
23 O'Mahony and his team - and he had a very substantial
24 team - and also to raise a particular issue that I was
25 concerned about. I was conscious that Chief 14:32
26 Superintendent O'Mahony did not know the name of the
27 person who was making the allegations, we had protected
28 his anonymity and I specifically, arising out of
29 Sergeant McCabe's letter, asked Michael Flahive to

1 recommend to Sergeant McCabe that if he had concerns,
2 that he would engage directly with the Garda
3 authorities and try to give him some assurance that he
4 could still engage, if he wished to, through the
5 confidential recipient. But we felt that if there was 14:33
6 additional information that Sergeant McCabe had that
7 would facilitate the investigation, he should be
8 encouraged to engage, but not in any way compelled to.
9 He was entitled to maintain his confidentiality if he
10 wished. And that was referenced at the end of that 14:33
11 letter.

12 575 Q. Yes. And if the first page of the letter maybe could
13 be brought up on screen, it's at page 7283 of the
14 materials. And I think even though the name is
15 redacted on top of it, it's to Sergeant McCabe, you can 14:33
16 confirm you've seen it?

17 A. I can, yes. A copy of the letter, the only copy of the
18 letter I could find was one that for some reason has
19 names redacted. It was directed to Sergeant McCabe and
20 it's signed by Michael Flahive and for some reason his 14:34
21 name is redacted from it. The first page of the letter
22 in fact reminds me that in his correspondence Sergeant
23 McCabe was also referencing the allegations that he had
24 made that ultimately were addressed by Judge O'Higgins
25 in the O'Higgins commission, and he was actually 14:34
26 referencing them at a time when we were in
27 correspondence with his solicitors trying to progress
28 matters. And they unfortunately weren't responding.

29 576 Q. All right. So I just want to maybe open the first

1 paragraph. It's to Sergeant McCabe, but appears
2 redacted and Mr. Flahive is directed by the Minister
3 for Justice and Equality, which was yourself at that
4 time, "to respond to your email of 12th December 2012
5 regarding allegations of improper cancellation of fixed 14:34
6 charge notices". And the letter continues, dealing
7 with the fixed charge penalty notices, and if I could
8 just turn to the very last page of the letter, at page
9 7287 of the materials, what is said there is:

10
11 "What is important now is that the current 14:35
12 investigation directed by the Garda Commissioner, who
13 has responsibility for the direction and control of the
14 force, be allowed to proceed unhindered, that nothing
15 is done which could impair or prejudice that 14:35
16 investigation and that the rights of third parties are
17 respected. If you have further information in your
18 possession which would be helpful to the investigation,
19 the proper approach would be to provide this to your
20 authorities within the force. You also, of course, 14:35
21 continue to have access to the Garda confidential
22 recipient."

23
24 And Mr. Flahive, even though his name is redacted, you
25 can confirm it was Mr. Flahive? 14:36

26 A. I can confirm Mr. Flahive wrote that letter, yes.

27 577 Q. And that letter is dated 17th December 20 --

28 A. Yes.

29 578 Q. And indeed that letter was opened in front of

1 Mr. Justice O'Higgins at the O'Higgins Commission as
2 well, isn't that right --

3 A. Yes.

4 579 Q. -- in relation to the matter. So those matters were in
5 December 2012. And the Assistant Commissioner O'Mahony 14:36
6 reported in May 2013?

7 A. Yes, that's right.

8 580 Q. The report was published in --

9 A. Well, he published it in March, he reported at the end
10 of March and it was published in May. 14:36

11 581 Q. In May of 2013. And thereafter, just sticking on the
12 non-cooperation issue, I think Mr. Brett, in his
13 evidence, referred to a meeting in the department with
14 Mr. Varadkar, who at that time was Minister for
15 Transport, in July 2013. 14:36

16 A. Yes, that's right.

17 582 Q. And the issue of non-cooperation, according to
18 Mr. Brett, was raised at that meeting, isn't that
19 right?

20 A. Well, I genuinely don't specifically mention it being 14:37
21 raised, but it may well have been done, it may well
22 have been raised and I'm certainly not going to
23 contradict Mr. Brett. That meeting was primarily
24 arranged following my asking colleagues in government
25 to make submissions on their perspective on the 14:37
26 O'Mahony report. I would have received a very detailed
27 letter from Leo Varadkar, who was Minister for
28 Transport, in June and we then arranged to have a
29 meeting with our departmental officials to look what

1 needed to be done to ensure the momentum was maintained
2 in implementing the recommendations made by O'Mahony.
3 But it's quite possible the issue of whether Sergeant
4 McCabe did or did not cooperate with the
5 investigation arose on that occasion, I just don't 14:37
6 specifically remember that conversation.

7 583 Q. All right. Mr. Brett seems to be under the impression
8 that he explained to you at that meeting that Sergeant
9 McCabe was adamant that that in fact wasn't the case.
10 You don't remember any -- 14:38

11 A. No, I genuinely don't remember having a conversation
12 with Mr. Brett about that issue.

13 584 Q. Yes.
14 A. It may well be it occurred, but I genuinely don't
15 remember it. 14:38

16 585 Q. All right.
17 A. But it did of course arise in other contexts.

18 586 Q. All right. And then it would appear that in October
19 2013 the issue was being debated in the Dáil --

20 A. Yes. 14:38

21 587 Q. -- in relation to the fixed charge penalty notices.
22 And the text of that debate appears at page 7242 of the
23 materials in its entirety. It will hopefully come up
24 on the screen in front of you. It's the first page of
25 it. So page 7243 of the materials, the penalty points 14:38
26 system was debated, and that's the beginning of the
27 debate.

28 A. Mm-hmm.

29 588 Q. And you spoke from page 7245 on the matter in relation

1 to various changes that had been made to the system and
2 were going to be made to the system. And at a later
3 stage, at page 7247 of the materials, Deputy Higgins
4 raised the issue of the whistleblowers and an
5 allegation that they had been victimised as a result of 14:39
6 being whistleblowers in relation to the penalty points,
7 and it was in that context that the issue of
8 non-cooperation seemed to have arisen. You agree with
9 that generally?

10 A. Well, it arose in the context of, I think, the general 14:39
11 debate that took place --

12 589 Q. The general debate?

13 A. -- in the House that day in relation to the penalty
14 points and ticket charge issue.

15 590 Q. All right. Okay. And it took a course in relation to 14:40
16 whistleblowers being then debated?

17 A. It did. And in the, in my summing up of that debate,
18 as you see in the first paragraph, I said there was no
19 basis for alleging that anyone had been victimised.

20 591 Q. Yes? 14:40

21 A. And went on to say that the allegations that were made
22 were taken very seriously. But I also went on to say
23 that allegations made included claims the number of
24 road accidents in which people lost their lives were a
25 consequence of fixed notice charges being cancelled, 14:40
26 and that was established in a very detailed basis to be
27 untrue. And I had concerns not just about allegations
28 made that fatal accidents had resulted from the
29 nonpayment of ticket charges, but that there were a

1 series of other allegations that had been made by
2 Sergeant McCabe for which there was also no basis.

3
4 Now, I'm saying that in the context of acknowledging,
5 as I did in this debate, and acknowledging here, that 14:40
6 there's absolutely no doubt that had Sergeant McCabe
7 not raised concerns about the ticket charge issue,
8 about the disfunction in the context of administering
9 what's called the fixed process system, I have
10 absolutely no doubt that if he hadn't raised those 14:41
11 issues those issues would not have come to the fore and
12 the changes that had been implemented would not have
13 occurred.

14
15 But unfortunately, in the context of making complaints 14:41
16 of a valid nature and making allegations that clearly
17 were correct, a number of very serious allegations with
18 regard to Garda corruption, with regard to deleting
19 material from, and altering material on the Pulse Garda
20 computer system, and some others, turned out to be 14:41
21 unsubstantiated and incorrect. And this is why it
22 would have been valuable had Sergeant McCabe engaged in
23 the process. He chose not to. And I did say in that
24 debate that unfortunately he -- I'm just trying to find
25 the exact quote - yes, I say: 14:42
26

27 "Insofar as individuals who raised issues are alleging
28 that the Garda reports published are untrue, let them
29 bring forward chapter and verse and proof of this. I

1 am open to being convinced, but they have not done so.
2 Having engaged with members of this House and published
3 material, they did not cooperate with the Garda
4 investigation that took place. I do not know why that
5 was the case." 14:42

6
7 Now, what I was particularly conscious of at that stage
8 was the following. That subsequent, not only to the
9 interim report, but subsequent to the publication of
10 the O'Mahony report, Garda McCabe, both in his 14:42
11 engagement with the department and also clearly from
12 public comment made by TDs, who I believe were
13 reflecting his view, was adamant and dogmatic that
14 every single allegation he'd made was correct. And
15 there was a continuing correspondence with Michael 14:43
16 Flahive asking him could he please provide the detail
17 of, you know, where the O'Mahony report is incorrect,
18 could he please provide the evidence to indicate where
19 it's incorrect. And in circumstances in which he could
20 have engaged, he could have decided to engage with 14:43
21 O'Mahony, in circumstances in which, having claimed
22 anonymity and he was then complaining he hadn't been
23 interviewed, I expressed the view that I held at that
24 time that he hadn't cooperated with the investigation.
25 And that was a view that I personally held, it 14:43
26 wasn't -- before someone asks me this, it wasn't a view
27 handed down to me by the Garda Commissioner. I think
28 we each reached independent views of this. My view
29 derived from the nature of my department's engagement,

1 from the fact that in April 2013 Sergeant McCabe was in
2 contact with the Taoiseach's office, the Taoiseach's
3 office passed on emails I think it was to me and our
4 department, he was complaining that he hadn't been
5 interviewed and then he said he made contact with 14:44
6 assistant commissioner, as he became, I think he was
7 chief superintendent then, but he made contact with
8 Chief Superintendent O'Mahony, and when he made that
9 contact I think the email recorded that he'd been asked
10 by O'Mahony would he meet one of his investigators or 14:44
11 one of his team, and the message the Taoiseach
12 detailed, that he was very alarmed at that suggestion
13 and he terminated the phone conversation. Now, at that
14 stage I had received the O'Mahony report. The O'Mahony
15 report had not been published. Had Sergeant McCabe 14:45
16 taken up the invitation to engage, if something had
17 arisen that required a delay in publishing the report,
18 if there was some issue O'Mahony wished to re-visit,
19 there'd have been no difficulty of any description. So
20 that was what led me to conclude and to make that 14:45
21 comment that unfortunately, despite him continuing to
22 protest the O'Mahony report was inaccurate in its
23 conclusions, that he hadn't cooperated with the
24 investigation and he had, in my view, an opportunity to
25 do so if he wished. 14:45

26 592 Q. All right. Had you confirmed that with the
27 Commissioner before making this statement in October
28 2013?

29 A. No, I didn't. I mean, I expect the first the

1 Commissioner knew of the statement was when it appeared
2 in newspapers. No, I hadn't engaged with the
3 Commissioner in that context. I had a huge concern
4 about the ticket charge allegations, I was extremely
5 serious about trying to ensure they were properly 14:46
6 addressed. I thought Chief Superintendent O'Mahony did
7 a very good job in dealing with the process issues in
8 his report and highlighting a whole range of
9 disfunction within the Gardaí - a lack of adequate
10 oversight; failure to comply with prescribed rules; 14:46
11 three senior Gardaí were subject to a disciplinary
12 inquiry as a consequence; letters remonstrating with 50
13 senior officers went out - but not such a good job had
14 been done with what I describe as the substantive
15 decisions made. In the statement I issued when the 14:46
16 report was published I referred to some decisions made
17 as lacking logic and common sense. I think in that
18 debate I referred to them as exotic.

19 593 Q. Yes.

20 A. So that's why I referred it to the Garda Inspectorate. 14:46
21 I was very determined that we get the issue right. And
22 I fully respected that Sergeant McCabe had very valid
23 reasons initially for wanting anonymity, but it was my
24 view that we got past that point both when Michael
25 Flahive wrote to him, indeed when he did have a phone 14:47
26 conversation, received an invitation from O'Mahony.
27 And at some stage later in the process, and I don't
28 think I knew this until sometime subsequent to receipt
29 of the O'Mahony report and the issue arising with the

1 Taoiseach, I think at some stage I learned of a
2 direction that the Garda Commissioner had arranged for
3 Sergeant McCabe to be given arising out of some access
4 to Pulse documentation. Now the direction very
5 specifically directed that further documents from Pulse 14:47
6 shouldn't be distributed outside the Garda force.

7 594 Q. Yes.

8 A. But it did contain within it an invitation for him to
9 engage with O'Mahony, and that invitation wasn't taken
10 up. So I would have had all those issues in my head 14:48
11 when I made what was really an unplanned comment in
12 response to a debate in the Dáil on 1st October 2013.

13 595 Q. All right, okay. If we could then go to January 2014,
14 to your statement in relation to the Public Accounts
15 Committee, which was then dealing with the penalty 14:48
16 points issue. And that's at page 7252 of the
17 materials. You will see the first page of it:

18
19 "Statement by the Minister for Justice, Equality and
20 Defence, Alan Shatter TD, on penalty points." 14:48

21 A. Yes.

22 596 Q. And it again summarises the Public Accounts Committee
23 role and the situation that was then developing with
24 regard to their hearings on the penalty points issue.
25 And if I could just then turn to the top of page 7253 14:49
26 of the materials. The beginning of that sentence is:

27
28 "While I am aware that some are concerned that the
29 investigation was not independent of An Garda Síochána,

1 I am not aware of the persons making the allegations
2 putting forward any substantive evidence which will
3 call into question Assistant Commissioner O' Mahony's
4 findings, despite requests to do so. Indeed, the
5 original assertions are merely repeated and further 14:49
6 cases are brought to attention in circumstances where
7 the persons making the allegations could not have full
8 knowledge of the facts. I have also previously
9 expressed concerns about how files containing
10 confidential information about individual private 14:49
11 citizens appear to have been disseminated to others."
12

13 So again, there is a reference there to maybe not
14 non-cooperation in those words, but requests being made
15 for evidence and those -- 14:50

16 A. Yes.

17 597 Q. -- not being followed up?

18 A. And they would have been primarily made by Michael
19 Flahive in correspondence that continued into the
20 autumn of 2013. 14:50

21 598 Q. In relation to the penalty points?

22 A. In relation to the penalty points ticket charge issue,
23 yes.

24 599 Q. And is that what you were referring to?

25 A. Yes, yes, that's what I'd have had in mind, yes. 14:50

26 600 Q. Was there any element of information coming from the
27 Commissioner being in your mind in relation to that
28 sentence there?

29 A. No, no. The issue that I was referencing at that point

1 was the continued assertions that were being made that,
2 effectively that all of the complaints made by Sergeant
3 McCabe were accurate. Some of them were of enormous
4 seriousness and of relevance not just to the good name
5 and reputation of people within the Garda force, but of 14:50
6 relevance to the general public. For example, in the
7 list of original issues raised by him, there were
8 allegations - and I'm saying this now from memory, but
9 I think it's referenced in one of my statements - there
10 were allegations that effectively nine individuals had 14:51
11 died in road traffic accidents as a consequence of the
12 nonenforcement of ticket charges and non-imposition of
13 penalty points. That issue had been dealt with in
14 enormous detail in the O'Mahony report and despite the
15 fact that it was quite clear from that report that that 14:51
16 allegation was mistaken and the impact that allegation
17 could have had on those who had lost loved ones in
18 fatal accidents, I was very conscious of. And despite
19 the fact that allegation was mistaken, it kept on
20 resurfacing after the O'Mahony report in newspaper 14:51
21 reports as if it was still valid. So I had real
22 concerns that allegations that were unsubstantiated
23 were continuing to be essentially stated to be
24 accurate, which were not.

25
26 There was also an issue that consistently arose about
27 the deletion and alteration of the Garda Pulse system.
28 Now, you can certainly make additions to the Garda
29 Pulse system, but as I understood it, and Michael

1 Flahive in his letter of December 2013 would have
2 referenced this, as I understood it, once material is
3 on the Garda Pulse system, it can't be altered or
4 deleted. Additions can be made to it. And that issue
5 continued to be dealt with and raised all the way 14:52
6 through to the report published by GSOC in December
7 2017 on the ticket charge issue when they definitively
8 stated that you can't alter or delete material from
9 Pulse. And that's exactly what the O'Mahony report had
10 said four years earlier. 14:53

11 601 Q. Okay. Well, so they were the issues that led to that
12 inclusion in your statement --

13 A. Yes.

14 602 Q. -- in relation to that. We then have a statement made
15 by Sergeant McCabe himself in relation to the issue of 14:53
16 non-cooperation, and that comes along in February 2014.
17 You're aware of that statement?

18 A. I am, yes.

19 603 Q. He issued a statement?

20 A. He published an engagement between him and a senior 14:53
21 officer relating to the direction issued by the Garda
22 Commissioner that I would have mentioned that was, goes
23 back, I think, from memory to around December 14, 2012,
24 I think.

25 604 Q. Yeah, 14th December 2012? 14:53

26 A. Yes.

27 605 Q. Yes, yes. And I think what Sergeant McCabe said is
28 that he was never - it's page 7256 - he was never
29 contacted by anybody conducting the O'Mahony

1 investigation which completed its report without making
2 any attempt to speak with me or to seek his input or
3 cooperation into inquiries. He said he never withheld
4 any information or cooperation from the O'Mahony
5 investigation, as it was then suggested. 14:54

6 A. Yes. The problem and the difficulty with that
7 statement is - and I'm not questioning that it's true,
8 but - how he expected O'Mahony or a member of his team
9 to make contact with him in circumstances in which he
10 demanded anonymity and in circumstances in which that 14:54
11 anonymity was respected and in circumstances in which
12 the material furnished to the O'Mahony team had his
13 name, any reference to him redacted from it, is
14 something of a puzzle.

15 606 Q. All right. Well, then I suppose I'll bring you to your 14:55
16 statement of 26th March 2014, where there would seem to
17 be a very fulsome apology to Sergeant McCabe in
18 relation to the issue of non-cooperation. And maybe if
19 we just look at some paragraphs of that statement first
20 of all. At page 7257 of the materials. 14:55

21 A. Yes.

22 607 Q. What you say is:

23
24 "I want to begin by addressing a matter of substantial
25 importance. On October 1st, 2013 in a topic issue 14:55
26 debate on the penalty points issue I made a statement
27 that the whistleblowers did not cooperate with the
28 Garda investigation that took place in respect of their
29 allegations. I appreciate that this statement has been

1 the source of some upset and distress to the
2 whistleblowers. I have looked again at the information
3 provided to me and considered the matter in detail. I
4 previously stated on the Dáil record that I expected
5 that Sergeant McCabe would be interviewed during the 14:56
6 course of the O'Mahony investigation and I note that he
7 fully engaged with the Garda Inspectorate in the work
8 undertaken by them to prepare the report which is the
9 subject-matter of today's debate. I want to say very
10 clearly that having re-examined the facts and further 14:56
11 considered the matter, I believe more should have been
12 done during the course of the O'Mahony investigation to
13 obtain information from and ascertain the views and
14 experience of the whistleblowers. Further and better
15 efforts could and should have been made to secure 14:56
16 productive engagement with them in the investigation of
17 their claims. I, therefore, wish to correct the record
18 of this House that the whistleblowers did not cooperate
19 with the Garda investigations that took place. I
20 acknowledge that this statement was incorrect. It was 14:57
21 never my intention to mislead the House and I believe
22 it is appropriate that I apologise to both and withdraw
23 the statements made. It was never my intention to
24 cause any upset and if any upset was caused, I hope
25 that my correcting the record of the Dáil today will 14:57
26 put this matter to rest. In doing so, I again
27 acknowledge, as I have done many times previously, that
28 the reports published and the findings and
29 recommendations that have been made with regard to the

1 fixed notice charge system and penalty points are in
2 response to the allegations made by Sergeant McCabe and
3 supported by former Garda Wilson. "
4

5 And the statement goes on in relation to the penalty 14:57
6 points system and changes that were made to it and so
7 forth. Now, in relation to that, I think it's a fairly
8 fulsome apology in relation to what was said in the
9 Dáil on 1st October.

10 A. Yes. Well, there had been an ongoing controversy about 14:58
11 this issue and I had already previously addressed it, I
12 think in the Dáil, on 26th February --

13 608 Q. Yes?

14 A. -- and detailed some of the background I've already 14:58
15 detailed in answer to previous questions. I determined
16 it was important to bring the controversy to an end and
17 I also appreciated the fact that, as I understood it,
18 that Sergeant McCabe had constructively engaged with
19 the Garda Inspectorate. What I had learned in the
20 period immediately preceding making this statement was 14:58
21 the knowledge of Chief Superintendent or Assistant
22 Commissioner O'Mahony in the context of Sergeant McCabe
23 as a complainant. As I said earlier, we had preserved
24 Sergeant McCabe's anonymity throughout and my
25 understanding was that at no stage did Assistant 14:59
26 Commissioner O'Mahony know that Sergeant McCabe was the
27 complainant.

28
29 I think towards the end of February or some time in

1 March I got to read the transcript of the proceedings
2 before the PAC committee the previous January - this
3 was the hearing at which both the Garda Commissioner
4 Martin Callinan attended and Superintendent O'Mahony.
5 My knowledge of, initially of what took place at that 14:59
6 meeting derived essentially from newspaper reports, not
7 from the meeting -- not from the transcript of the
8 meeting. It was clear during questioning, that in the
9 transcript Assistant Commissioner O'Mahony acknowledged
10 at some point that by either January or February 2013 14:59
11 he either knew or guessed - I'm not sure which it was -
12 that Sergeant McCabe was the complainant.

13 609 Q. Yes.

14 A. I sat back in the context of all of the controversy
15 that was taking place around this issue and asked 15:00
16 myself the very simple question, and this is no
17 criticism of Assistant Commissioner O'Mahony, because I
18 can well understand why he dealt with matters as he
19 did, but I asked myself the question: If I had known
20 what he knew and I was conducting that investigation, 15:00
21 would I have considered it wise and sensible to at
22 least ascertain could I interview the complainant? I
23 think if I was him I would have regarded it
24 inappropriate in circumstances where the Minister had
25 preserved anonymity and I either knew or simply 15:00
26 suspected who the complainant was, that I'd go off and
27 try and interview him. But I did consider that if I
28 had been in his shoes I'd have probably got the Garda
29 Commissioner to write to the Minister for Justice to

1 find out and to specifically ask would the complainant
2 engage with the O'Mahony investigation.

3
4 Now, that hadn't happened. And it is correct Sergeant
5 McCabe said in his statement that no one had actually 15:01
6 asked him to engage. Now, as I say, in circumstances
7 where his identity wasn't known, he couldn't have been
8 asked, but it became clear to me then that by either
9 January or February of 2013, at least there was a
10 suspicion on the part of Assistant Commissioner 15:01
11 O'Mahony as to who the complainant was. I thought, I
12 was very conscious that this was causing continuing
13 upset and causing upset to Sergeant McCabe, I'd no wish
14 for this to be an ongoing controversy and I thought it
15 was right and correct to make that apology and that's 15:01
16 how the apology arose.

17 610 Q. Okay. So I was wondering about that, Mr. Shatter,
18 because as I understand your evidence, you totally
19 stand behind your statements in the Dáil in October
20 2013 in relation to non-cooperation -- 15:01

21 A. Yes.

22 611 Q. -- and you justify those on the basis of your own
23 dealings in the department, is that right?

24 A. Yes. And my knowledge of matters at that point.

25 612 Q. Okay. And also in relation to your statement in 15:02
26 January 2014?

27 A. Yes. And of course, the main purpose of that statement
28 in January was to address the difficulties that had
29 arisen before the Public Accounts Committee, at which

1 the Chairman, towards the end of the meeting, alleged
2 that over 200 Gardaí were being accused of corruption.
3 I had enormous concerns about that and the manner in
4 which the PAC were dealing with the issues. And that
5 statement was primarily about referring the totality of 15:02
6 the ticket charge and penalty point allegations to the
7 Garda Síochána Ombudsman Commission.

8 613 Q. Okay. And your apology comes in the context of you
9 then knowing that the guards probably know that Sergeant
10 McCabe -- 15:02

11 A. Yes.

12 614 Q. -- was the complainant --

13 A. Yes.

14 615 Q. -- and didn't make an effort --

15 A. Yes. 15:03

16 616 Q. -- to interview him?

17 A. Yes.

18 617 Q. And that's how you justify the --

19 A. Yes.

20 618 Q. -- the two stands together? 15:03

21 A. Yes.

22 619 Q. Okay. And you stand behind your apology to Sergeant
23 McCabe --

24 A. Yes, yes.

25 620 Q. -- is that correct? 15:03

26 A. Yes, I think there would have been a lot --

27 621 Q. And you don't go back on it in any way?

28 A. No, I think there would have been a lot of wisdom had
29 Assistant Commissioner O'Mahony at least asked the

1 Garda Commissioner to ascertain could we find out from
2 Sergeant McCabe or would he engage with them and that
3 that be an official request from the Garda
4 Commissioner. But again, it is also true and factual
5 and part of the truth of this, that we sought to bring 15:03
6 that about through our letter from Michael Flahive back
7 in December 2012.

8
9 The problem in the context of dealing with this issue,
10 it's seen constantly in black and white terms. It's 15:03
11 quite a complicated narrative and the background to it
12 is quite complicated.

13 622 Q. All right, okay. Could I go back to May 2013? At that
14 stage the O'Mahony inquiry result had been published,
15 you published that. And I think because of the ongoing 15:04
16 contacts with Sergeant McCabe and his legal advisors,
17 you raised a query with Commissioner Callinan in
18 relation to Sergeant McCabe?

19 A. Yes. The background to the query was the difficulties
20 being experienced in dealing with issues raised by 15:04
21 Sergeant McCabe, what I perceived to be the erratic
22 nature of his engagement. I'm very conscious that this
23 Tribunal doesn't want to re-visit issues from the
24 O'Higgins Commission, but in the background,
25 truthfully, were a number of issues. One was a series 15:04
26 of letters sent to Sergeant McCabe's solicitors trying
27 to seek agreement that documentation provided to the
28 department in confidence, directed for my eyes only,
29 for the addressee only, that we could release that to

1 the Garda Commissioner to get observations, to
2 ascertain, having got them, whether there was a need
3 for a public inquiry or commission of investigation.
4 That was one issue.

5
6 There was, Sergeant McCabe adamantly insisting that
7 every allegation made by him on the ticket charge issue
8 stood up, even though some patently didn't. There was
9 the complaint that he hadn't been interviewed in
10 circumstances in which he'd sought anonymity. And
11 there was this very strange arrangement that he
12 described the Taoiseach of being invited to meet a
13 member of the O'Mahony team and regarding it as being
14 alarming. There was continuing public controversy. I
15 was being publicly pilloried. The fact that I had
16 truthfully and genuinely wanted to resolve the issues
17 and ensure we had the best possible and transparent
18 system administering the fixed charge ticket issue was
19 partially being ridiculed, and the Garda Commissioner
20 was being demonised. And there was a particular
21 problem.

22
23 So my recollection of this is that no, when I first
24 wrote to the Commission I said I think it occurred
25 after the O'Mahony report was published; I'm pretty
26 certain that this was a conversation that did occur now
27 after the O'Mahony report was published, because I
28 think it was a consequence also of the reaction to the
29 O'Mahony report. There was a phone conversation

1 between myself and the Commissioner on a number of
2 different issues, I think I was in the Department of
3 Justice and I simply said to him look, along the lines
4 that there's continuing difficulties dealing with
5 issues raised by Maurice McCabe. The Commissioner knew 15:06
6 nothing about the letters that weren't being responded
7 to, because that wasn't an issue we'd written to him
8 about because of the confidentiality issue. And I said
9 to him, is there something in the background here that
10 I should know? Is there some other issue of concern? 15:07
11 And his reaction was to say that the only issue that
12 occurred to him was that some years ago, and I can't
13 recall did he then or did I subsequently, in the
14 context of all the later publicity that has since
15 arisen, did he say it was 2006 or was it just some 15:07
16 years ago, I'm not 100% certain of that, that an
17 allegation was made of a sexual nature in relation to
18 Sergeant McCabe, that it had been fully investigated
19 and the DPP had directed there was no basis for a
20 prosecution. And I asked him were there any similar 15:07
21 further allegations made and he said no. And he then
22 speculated that perhaps Sergeant McCabe was upset at
23 the manner in which the matter was dealt with. Now, I
24 took that to mean that this impacted in some personal
25 way on Sergeant McCabe and that this was impacting just 15:08
26 on his perception of how he could or should engage with
27 the Gardaí.
28
29 Looking back on it now, the conversation on that issue

1 was very brief. I took the view, and maybe it's my
2 legal training, that it was -- I didn't ask what the
3 charge of a sexual nature or the allegation of a sexual
4 nature was, I didn't know that it related to --
5 allegedly to a child until I subsequently met the young 15:08
6 woman, which I reference in my submission, or in my
7 statement to the Commission, and I didn't query it any
8 further. And my only perception of it was, contrary to
9 the way Martin Callinan has been portrayed, was he
10 didn't make a big deal out of it. My perception was 15:09
11 that whatever the allegation was wasn't a major issue.
12

13 Now, as someone practising in the area of family law
14 who has dealt for over 30 years with family cases, I've
15 had far too many instances of false allegations of 15:09
16 sexual abuse being made by one parent against another
17 in the context of fights over the custody of children.
18 And of course I have had allegations in cases I've
19 dealt with that have been true. But in the vast
20 majority of cases, they're part of unfortunately the 15:09
21 tool of battle that a parent seriously at war with the
22 other parent often uses to try and curtail access.
23

24 So perhaps I didn't treat this as being something
25 horrendous to be explored, I just took it that the DPP 15:09
26 had decided there was no basis for the allegation and
27 that was the end of it.
28

29 It was something that Martin Callinan and myself never

1 again discussed. And indeed I didn't even impart that
2 information to anyone working with me in the Department
3 of Justice, not even to my special advisor and I
4 never -- or I'd two specialise advisors. And I never
5 discussed it with any member of the Oireachtas. 15:10

6 623 Q. All right. Did you understand that there was some sort
7 of work connection with the complainant?

8 A. No, no.

9 624 Q. The daughter of a colleague?

10 A. No, nothing was said to me. I had no idea that the 15:10
11 allegation in any way related to a girl born to another
12 member of the force.

13 625 Q. Yes?

14 A. Or parented by another -- this was never part of the
15 conversation. It was an extraordinarily brief 15:10
16 conversation. And I was just trying to work out in my
17 head why everything you dealt with in relation to
18 Sergeant McCabe, taking that allegations he made -- a
19 number of them have been proved to be right and some of
20 his concerns have been proved to be correct, and it was 15:11
21 very important those issues were raised, but there were
22 others that were exaggerated and there are others based
23 on no evidence of any description. And there was this
24 feeling that when you were dealing with issues that he
25 raised that you were sort of sinking in quicksand and 15:11
26 there was -- I was trying to work out why he had what I
27 perceived to be on occasions a somewhat distorted
28 perception of events, and that was my own personal
29 perception.

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

Did that conversation explain it to me? It just indicated to me that perhaps there was something in the background that he was upset about. And I think also it wasn't beyond that an issue that impacted in any shape or form on how I dealt with any matter to do with Sergeant McCabe. I was always concerned as a lawyer and as a Minister to get to the truth of allegations that were made. 15:11

626 Q. All right. And it was never mentioned again, is that right? 15:12

A. Never mentioned between us again at any point in time. And yeah, I mean it just wasn't mentioned again, there's no --

627 Q. And it's something though that you distinctly remember, so it might stand out in your head? 15:12

A. No, I remember the conversation, which is why I wrote to the Commissioner at a very early stage to record it.

628 Q. Yes.

A. It never arose again. There were occasions when there were press conferences that the Commissioner and myself held where Superintendent Taylor would have been present as Press Officer, we'd have a cup of coffee or a cup of tea often before those press conferences -- they usually surrounded an event that, you know, the announcement of Garda statistics or some celebration in Templemore College or something, young recruits graduating, we frequently dealt, unfortunately, with the ticket charge issues and other issues raised by 15:12

1 Sergeant McCabe, but this was never an issue that even
2 came up in conversation between us over the cup of tea
3 in private before we had a press conference or a press
4 engagement.

5 629 Q. All right. Now, if we go forward to January 2014 at 15:13
6 the time the Public Accounts Committee was dealing with
7 the penalty points issue. The Tribunal has heard
8 evidence from a number of people to the effect that
9 there were lots of rumours around Leinster House about
10 Sergeant McCabe and in view of your earlier 15:13
11 conversation with the Commissioner, I was going to ask
12 you did you hear those rumours? And if you did, did
13 you tie them in with the earlier conversation?

14 A. I'm genuinely puzzled about this. I mean, the Tribunal
15 is aware of what submissions you've received from 15:14
16 members of the Houses of the Oireachtas. As Minister
17 for Justice, when you're going for a cup of coffee or
18 you are having lunch or you are walking through the
19 corridors, colleagues constantly come up to you about,
20 with all sorts of issues. And of course the ticket 15:14
21 charge issue and allegations made by Sergeant McCabe
22 featured very substantially in the Dáil on and off in
23 the periods between really December 2012 all the way
24 through to the appointment of Mr. Guerin to carry out
25 an inquiry. 15:14

26
27 There wasn't a single member of Dáil Éireann that I
28 have any recollection ever coming to me with any gossip
29 about Sergeant McCabe and any allegations of

1 impropriety of any nature in relation to, you know, the
2 sexual issue that's come up or the alleged -- the issue
3 that gave rise to an investigation and the DPP saying
4 there was no basis for prosecution. No one ever
5 stopped me in a corridor. It was not something that I 15:15
6 was aware was subject of gossip.

7
8 Now I know when you are a Minister you are in a
9 somewhat rarified place and you are coming out of the
10 Dáil chamber and going off into Ministerial buildings, 15:15
11 but I was around about enough, having a drink with
12 colleagues or having lunch with colleagues and engaging
13 with colleagues and meeting colleagues, I would have
14 expected if there was rumours about this issue up to
15 the period of May 2014 when I was engaged as a 15:15
16 Minister, and ceased to be a Minister, that someone
17 would have said something to me about that issue.

18
19 I certainly never engaged with anyone on that issue and
20 certainly I am not aware that there was some widespread 15:15
21 gossip in Leinster House about that issue. Maybe it
22 was taking place behind my back, I don't know. But
23 certainly I was not aware of it.

24 630 Q. Okay. And --

25 A. And it was also, by the way, never raised by any 15:16
26 journalist with me either.

27 631 Q. Okay. In relation to what's referred to as the car
28 park meeting between --

29 A. Yes.

1 632 Q. -- Commissioner Callinan and Deputy McGuinness, it
2 would appear that Mr. Purcell knew about that meeting.
3 Did you have any knowledge of it?
4 A. I'd no knowledge of it, of any description. In fact,
5 the first I learned of that meeting having taken place 15:16
6 was when Deputy McGuinness announced it to the world in
7 2016, shortly after publication of the O'Higgins
8 Commission report. Mr. Purcell never mentioned it to
9 me. Martin Callinan never mentioned it to me. Had I
10 been asked by Mr. Purcell, if he had said to me the 15:16
11 Garda Commissioner is thinking of arranging to meet
12 with the Chairman of the Public Accounts Committee to
13 discuss this issue in private, I'd have counselled that
14 that was not a wise thing to do.
15 15:17
16 But no, I knew nothing of it. And it was never -- I
17 was never informed of it.
18 633 Q. Okay. Now, in May 2014 you resigned as Minister. And
19 I think in June you met with Ms. D, is that right?
20 A. Yes. 15:17
21 634 Q. And if you could tell us how that came about, please?
22 A. I got a phone call from Paul Williams, an individual
23 for whom I have a great deal of respect. He informed
24 me that Ms. D, as she's now known as, wished to meet
25 with me. He told me he was ringing me really in 15:17
26 connection with the articles that had appeared in the
27 Independent. Now, this isn't an exact reciting of the
28 conversation, it's my précis of the conversation.
29 635 Q. Had you read those articles at that stage?

1 A. I had read the articles, I was aware of them. I wasn't
2 aware of anything other than what was in the articles.
3 Arising out of what the Garda Commissioner had told me,
4 I suspected -- told me in our previous engagement that
5 I mentioned --

15:18

6 636 Q. Yes?

7 A. -- in our phone conversation, I suspected it might have
8 something to do with Sergeant McCabe. I didn't know
9 for sure. And what Paul Williams had said to me was
10 that he had met with this woman and she wanted to meet
11 with me. Now, that is my recollection of what
12 occurred. And would I meet with her? And I was no
13 longer Minister for Justice and I wasn't quite sure why
14 she wanted to meet with me and I think I asked that
15 question and he said that -- I was aware from his
16 reports and also in our conversation he referenced the
17 fact that she had already met with Mícheál Martin. And
18 he said she wanted to tell me her story.

15:18

15:18

19
20 I wasn't in a good place at that time I think is the
21 simplest way of putting it.

15:19

22 637 Q. Fair enough.

23 A. I'd ceased to be Minister. I think I was traumatised
24 by the circumstances, unexpected as they were, that had
25 occurred. I was expecting to be vindicated, not
26 condemned by Mr. Guerin. My family was upset. And I
27 would confess I had limited enthusiasm for meeting with
28 her. And I did, out of respect for Paul, say yes, and
29 we arranged to meet. And we met in the Mount Merrion

15:19

1 -- not Mount Merrion, in the Merrion Hotel. I'm always
2 anxious when I have meetings to have someone accompany
3 me, so Jane Lehane, one of my personal advisors, came
4 with me to the meeting. Paul Williams was there, she
5 was there. And our meeting lasted some time, something 15:20
6 between an hour to an hour and a half, I think.

7 638 Q. Okay. And if you could just summarise what took place
8 - we don't need the details - the topics that were
9 discussed during that meeting.

10 A. Yes. Well, firstly the young lady I met was very 15:20
11 stressed. And I found her stress at the time
12 distressing.

13 639 Q. Yes.

14 A. I suppose I was somewhat stressed myself. But she told
15 her story and she made -- her story essentially 15:20
16 surrounded an event that had happened allegedly in
17 2006. She named Sergeant McCabe. She said that she
18 tried to put it behind her. She told me that I think
19 when she was 12 or 13 it occurred to her, the enormity
20 of what she alleged occurred came to her. She told me, 15:21
21 as she described it at the time, that as a young
22 teenager she'd acted out and behaved badly and she
23 attributed it to that. And essentially her complaint
24 was that she believed that her allegation hadn't been
25 properly investigated. 15:21

26
27 She told me that she was attending college, that all of
28 the -- as she put it, all of the stuff in the
29 newspapers about Sergeant McCabe, painting him in

1 heroic terms, had caused her enormous stress, that she
2 had found it very difficult to study, I think my
3 recollection may be right that she postponed taking her
4 exams that year because of her level of stress and she
5 wanted to know what I could do to have the manner in 15:22
6 which the investigation was conducted addressed.

7 640 Q. Yes.

8 A. She was aware of the fact I'd ceased to be Minister and
9 seemed to be aware of the fact that Mr. Guerin had
10 recommended a commission of investigation. 15:22

11 641 Q. All right.

12 A. And that's why she wanted to meet with me. And
13 essentially that was the conversation. I took some
14 time with her. I was very concerned, frankly, for her
15 well-being and her state of mind. I was concerned that 15:22
16 if she further pursued the issue, as it seemed that she
17 wished to do, that she could be reopening a hornet's
18 nest and that she could be -- I think I made some
19 comment to her that it could go on for a very long time
20 with no certainty of the outcome, that if there was an 15:23
21 inquiry it wouldn't necessarily result in any outcome
22 that would be of any help to her. And I did talk
23 around the advisability of her further pursuing it.
24 But she seemed very adamant she wanted it pursued.

25
26 I had been at the receiving end of a never-ending
27 stream of false allegations from January of that year
28 across a whole range of issues, not just those being
29 investigated or that were investigated by Mr. Guerin,

1 and I was very conscious that if I wrote to the
2 Taoiseach or if I wrote to the new Minister for Justice
3 referencing the information she gave me and proposing
4 that it be part of what was to be the commission of
5 investigation that was ultimately to take place, that 15:24
6 it might be perceived as me trying to exact some sort
7 of revenge on Sergeant McCabe or trying to have a go at
8 him or trying to make some slanderous allegation. And
9 I did advise her in the presence of Paul Williams that
10 the best person to be of help to her was Mícheál 15:24
11 Martin, because Mícheál Martin had raised Sergeant
12 McCabe's dossier in the Dáil, he was the one who had
13 made, amongst others, false allegations against me and
14 that no one would think that he was out to do down
15 Sergeant McCabe. She discussed with me the fact that 15:24
16 she had met with Mícheál Martin, that she understood
17 that Mícheál Martin had written to the Taoiseach, but
18 she had heard nothing more and she was frustrated.

19
20 So I said, my recollection is that I said to her I 15:24
21 would give some consideration as to how I would raise
22 the issue. I knew there was a debate coming up on the
23 Cooke report in the Dáil within two or three days of
24 our meeting. I'd intended to use that debate as an
25 opportunity to talk also about the Guerin Report. I 15:25
26 genuinely don't remember whether I actually said to her
27 whether I thought, or whether this was a thought to
28 myself, did I consider could I raise the issue in some
29 way during that debate, but ultimately I decided I

1 would.

2

3 So having met her, I went back and re-read the Paul
4 williams articles, I think we had to get them out of
5 the Oireachtas library or something. 15:25

6 642 Q. Yes?

7 A. I'm not sure, I hadn't actually been keeping them. I
8 was conscious of them. Having re-read the Paul
9 williams articles I decided that I had a duty as a TD
10 to at least raise her concerns and did so as best I 15:25
11 could in the Dáil.

12 643 Q. In the Dáil. She wasn't one of your constituents, is
13 that correct?

14 A. No, no, I had never met her before. And I've never met
15 her since. 15:26

16 644 Q. All right. And did Mr. williams partake in that
17 exchange?

18 A. Yes, he was there. Paul williams was there for the
19 whole meeting. He introduced her to me. To some
20 degree he participated in the conversation. Frankly, I 15:26
21 don't remember the detail of that.

22 645 Q. Yes.

23 A. I just remember the detail of my engagement with her.
24 I think it was her level of stress that particularly
25 impacted on me. 15:26

26 646 Q. All right. It's just, there is no suggestion of this,
27 but did Mr. williams in any way encourage the matter to
28 be included in a commission of investigation, or can
29 you remember anything?

1 A. I am sure I was told that Mícheál Martin was writing to
2 the Taoiseach to ask that it be included. Someone said
3 this to me --

4 647 Q. Yes?

5 A. -- during the course of that meeting. 15:27

6 648 Q. Yes.

7 A. And because from her perspective nothing had really
8 happened since --

9 649 Q. Yes.

10 A. -- I think she was skeptical that anything was going to 15:27
11 happen. And that's why I decided to raise the issue in
12 as discreet a manner as I possibly could so that I
13 wouldn't ignite another media frenzy and bring the
14 hounds of hell down on myself and my wife all over
15 again. 15:27

16 MS. LEADER: Okay, if you would answer any questions
17 anybody else might have for you.

18 CHAIRMAN: Can I just make a brief comment? It's not a
19 question of what I want or don't want, but I have a
20 specific set of terms of reference. Now, I do believe 15:27
21 that part of the job of a judge is to listen and that
22 people are entitled to go into issues that may not
23 necessarily be absolutely and completely strictly
24 within the terms of what is at issue, but could I ask
25 in terms of any questions that are going to be asked 15:28
26 that they be short and bear in mind that I am not, as
27 far as I can see, actually reporting on how well or not
28 so well Minister Shatter did in his job in relation to
29 Sergeant McCabe. It's not within my terms of reference

1 and as far as I can see it has already been
2 definitively dealt with by Mr. Justice O'Higgins. That
3 is what I think. Now if anyone wants to persuade me to
4 the contrary, I am open to hearing that. But I will
5 allow a certain latitude certainly, but I'm asking that 15:28
6 matters be kept, let's say, relatively brief.

7 MR. GORDON: Chairman, it is intended to ask the
8 witness some questions on behalf of Sergeant McCabe.
9 At this point could I ask you, Chairman, to change the
10 running order, so to speak? Mr. Shatter has given 15:29
11 evidence of a number of issues that we're not on notice
12 of. He's referred in particular to a letter that he
13 sent to the Commissioner of the day and in that
14 correspondence he recorded, he says, something of
15 significance. Now, we have not seen a copy of that 15:29
16 letter. He's also referred to evidence in relation to
17 the anonymity of Sergeant McCabe at the time of the
18 O'Mahony investigation, which surprises Mr. McCabe's
19 legal team and we're looking, as the evidence is
20 unfolding, for some documents that might help question 15:29
21 Mr. Shatter about his evidence.

22 CHAIRMAN: well, let's just deal with that particular
23 one first, Mr. Gordon. So, can you help me,
24 Ms. Leader, in relation to any documentation? Because
25 I am appreciating we have got about 8,000 pages here. 15:29

26 MR. McGUI NNESS: Chairman, in relation to the first
27 issue, the transcript records Mr. Shatter as having
28 said earlier that he wrote at a very early stage to the
29 Commissioner to record it. Now, my understanding is

1 that he's in fact referring to his statement to the
2 Tribunal made in very early course --
3 CHAIRMAN: Yes.
4 MR. MCGUINNESS: -- to the Tribunal, not to the
5 Commissioner. 15:30
6 CHAIRMAN: Yes. That is what I understood. I
7 understood you used the word wrongly.
8 A. I beg your pardon, yes. No, there is no letter I sent
9 to the Commissioner. No.
10 CHAIRMAN: I think, you were thinking of saying 15:30
11 commission, it turned into commissioner but you
12 actually meant to say the Tribunal. And that is the
13 letter that is that circulated?
14 A. I am afraid, judge, I have been before too many
15 commissions of investigation at this stage. 15:30
16 CHAIRMAN: well --
17 A. Yeah. No, there is no letter to the Garda Commissioner
18 of any description.
19 CHAIRMAN: All right. That's fine.
20 A. It was a letter of March last -- 15:30
21 CHAIRMAN: I actually didn't think there was, and that
22 is how I picked it up.
23 A. -- 2017 to the Tribunal.
24 CHAIRMAN: Does that help you?
25 MR. GORDON: That certainly helps, Judge. 15:30
26 CHAIRMAN: You carry on, Mr. Gordon. I'm sure you will
27 bear in mind what I said.
28 MR. GORDON: I will of course, Chairman.
29

1 THE WITNESS WAS THEN CROSS-EXAMINED BY MR. GORDON

- 2 650 Q. MR. GORDON: Good afternoon, Mr. Shatter. Breffni
3 Gordon is my name, I am one of the barristers
4 representing Sergeant McCabe in this Tribunal. Can I
5 ask you first and foremost to refer to page 7243, which 15:31
6 might come up on screen now? This is the debate in
7 Dáil Éireann when I think you attended there to deal
8 with the penalty point controversy for the first time.
9 A. Sorry, what date is that debate?
- 10 651 Q. It's coming up on the screen there now. It's 1st 15:31
11 October 2013. And the first page of the debate is
12 7242. And the issue itself is actually addressed on
13 page 7243.
14 A. Mm hmm.
- 15 652 Q. And you'll see there that there's a heading "Topic 15:31
16 commission debate: Penalty points system". And can I
17 just ask you before we look at that paragraph --
18 A. Sorry, which paragraph is it?
- 19 653 Q. This is the paragraph under the heading "Topical issue
20 debate: Penalty points system" on page 7243. It's 15:32
21 halfway down the page?
22 A. Yes, I presume --
- 23 654 Q. In fact, it's coming onto the screen now.
24 A. If I can just --
- 25 655 Q. The first words under that heading -- 15:32
26 A. My screen seems to be very hazy for some reason.
- 27 656 Q. If you want to use the volume --
28 A. Unless it's my eyesight, I don't know, but I can't read
29 this at all.

1 657 Q. volume 26.
2 A. what volume is it?
3 658 Q. Perhaps you could be given a hard copy. I think it's
4 volume 26. In fact, you're going to be getting some
5 assistance now and you will be given that. 15:32
6 A. Right, thank you very much. Yes, this screen doesn't
7 seem to be readable.
8 CHAIRMAN: Are you having any luck, Mr. Shatter?
9 A. Yes, we're getting there, judge.
10 659 Q. MR. GORDON: 7243 is the page. 15:33
11 A. Yes, I'm just finding it now. Yes. Now, 7243?
12 660 Q. Yes.
13 A. Yes.
14 661 Q. And you'll see that the first speaker in relation to
15 the issue is Deputy Padraig McLoughlin, do you see 15:33
16 that?
17 A. Yes.
18 662 Q. And if you drift over to the next page, 7244, Deputy
19 Joe Higgins has an input then. And on the next page
20 then you answer the questions or the issues as they 15:33
21 were addressed by the two deputies.
22 A. Yes, I have that.
23 663 Q. And can I just ask you to confirm that on that
24 particular day, which is 1st October 2013, that that
25 was the first time that you addressed Dáil Éireann in 15:34
26 relation to the penalty point issue?
27 A. The first time I addressed Dáil Éireann in relation to
28 the penalty point issue?
29 664 Q. In relation to this particular issue here, this

1 particular controversy.

2 A. I'm sorry, I don't understand the question, because I
3 addressed Dáil Éireann on a number of occasions on the
4 penalty point issue.

5 665 Q. Okay. Can I ask you was this the first occasion when 15:34
6 you did that?

7 A. No.

8 666 Q. Or do you know?

9 A. I would have had multiple Dáil questions on the penalty
10 point issue going all the way back to 11th December 15:34
11 2012 when there was an exchange involving Deputies Daly
12 and Wallace and another deputy is my recollection. I
13 can't off the top of my head --

14 667 Q. Well, it seems --

15 A. I know there were various occasions when there were 15:34
16 Dáil questions. I can't off the top of my head record
17 whether we had any debates. I no longer -- I don't
18 remember was there a debate after the O'Mahony
19 report --

20 668 Q. It just seems from the transcript -- 15:35
21 A. -- was published.

22 669 Q. -- it's the first day that you addressed Dail
23 Eireann --

24 A. It's first day I addressed the issue following
25 publication of the report of the Comptroller and 15:35
26 Auditor General if that's what you're asking me.

27 670 Q. And you can see that when the issue was raised, it's
28 first raised Deputy Padraig McLoughlin, he puts on the
29 record, it seems, the fact that the Comptroller and

1 Attorney General has reported on the issue, he
2 describes the outcome as absolutely shocking, he refers
3 to widespread maladministration, poor procedures. Do
4 you see that there in the first paragraph?

5 A. Yes. 15:35

6 671 Q. And he then in the next paragraph refers to "this as a
7 crisis". And he makes this comment then in that second
8 paragraph, he said:

9
10 "He and the Garda Commissioner, I believe, sought to 15:35
11 undermine their credibility and talk down the numbers
12 that were involved."

13
14 Now, can I just ask you to focus on that particular
15 sentence at the moment? 15:36

16 A. Hmm.
17 672 Q. I think that the word "he" is a reference to you, isn't
18 that so?

19 A. I think you should remember that this is political
20 hyperbole -- 15:36

21 673 Q. I am just asking --
22 A. -- from an Opposition deputy who is a member of Sinn
23 Fein who is debating an issue in a politically
24 opportunist manner in Dáil Éireann. I mean, are we
25 going to -- 15:36

26 CHAIRMAN: Yes, I know, but I'm going to speak now, if
27 you don't mind. If necessary I am going to act like
28 Judge Judy. But look, there is a separation of powers
29 doctrine. I stopped people when they started to tell

1 me how great Leo Varadkar was for mentioning Sergeant
2 McCabe and similarly, where this is going to get us, I
3 actually don't know, but if there is a point to the
4 question, I'm certainly willing to listen to it. But
5 I'm not interested in either political questions or
6 political answers and that's it. 15:36

7 674 Q. MR. GORDON: what I was trying to bring Mr. Shatter to
8 is the reference in the question to, or at least the
9 suggestion that you were with Commissioner Callinan
10 undermining the credibility of the whistleblowers. 15:37

11 A. Entirely untrue.

12 675 Q. All right. I think that on the next page then Deputy
13 Joe Higgins contributed to the subject-matter and he
14 makes the point there, this is on the 7244,
15 Mr. Shatter, he says: 15:37

16
17 "Is it not the case that the whistleblowers are
18 exonerated and as truthful and honest in light of this
19 revelation? One person has left and another member is
20 subject to sanctions. Will the Minister see that
21 justice now prevails here?" 15:37

22
23 And again, that is probably a political statement as
24 the Chairman has pointed out.

25 A. I am having difficulty hearing you. 15:37

26 676 Q. Again, that is probably a political statement, as the
27 Chairman has pointed out. But he's making the point
28 there that the whistleblowers were exonerated as having
29 been persons who gave a truthful account.

1 A. Hmm.

2 677 Q. And I think that you then, in response to these
3 suggestions that the whistleblowers had brought to
4 light these particular issues, then speak on the
5 subject-matter on page 7245, do you see that? And I 15:38
6 don't want to paraphrase to a significant extent what
7 you've said, but I think you were forced to acknowledge
8 that the revelations, as they had been made, and the
9 findings of the Comptroller and Attorney General had
10 revealed an inadequate record keeping on the part of An 15:38
11 Garda Síochána, inconsistency, that there were a
12 significant number of cases involved and that you in
13 fact welcomed the report?

14 A. I wasn't forced to acknowledge anything. Because the
15 reality and the truth was the O'Mahony report had 15:39
16 identified substantial disfunction within the fixed
17 charge processing system; it had identified a failure
18 of Gardaí to abide by proper practice and procedures;
19 it had identified that senior Gardaí were making
20 decisions that they should not have made outside their 15:39
21 areas; it identified a whole range of disfunction. And
22 I welcomed the C&AG's report at the time, because it,
23 in effect, confirmed and reiterated the difficulties
24 which were identified by O'Mahony, which I again say
25 without Sergeant McCabe's engagement would not have 15:40
26 been identified. But they didn't uphold, and it wasn't
27 the C&AG's role to uphold allegations of criminality,
28 of corruption, of deleting material from the Pulse
29 system, of perverting the course of justice. These

1 were allegations that had also been made.

2
3 And the problem I faced as Minister for Justice was
4 that when you're living in a political world, the truth
5 often gets lost in the middle of hyperbole and there 15:40
6 was a lot of false allegations around and being made
7 and everything was dealt with in black and white terms.
8 But as you can see from the speech I made in the
9 introduction to this particular matter, I set out very
10 clearly my view of the report, I referenced the 15:41
11 O'Mahony report and in this particular contribution I
12 also praised the two whistleblowers for raising the
13 issues that they'd raised. But it was also important
14 as Minister for Justice to tell the truth, not get
15 carried along in the media frenzy that was taking place 15:41
16 and to ensure that ultimately allegations that had not
17 been substantiated were also identified and addressed.
18 It was as simple as that. No one, frankly, was forcing
19 me to do anything. Had I been forced -- if I was being
20 forced along the changes introduced after O'Mahony 15:41
21 would not have happened, seven principles I set out for
22 the Gardaí, which I personally drafted, they had to
23 adhere to for fairness in the ticket charge system
24 would not have been published in May of 2014, and the
25 matter wouldn't have been referred to the Garda 15:41
26 Inspectorate. So I wasn't being forced to do anything.
27 I was determined to get to the truth of the issue and
28 fix the system.

29 678 Q. I see. Mr. Shatter, can you turn to page 7256 of the

1 booklet? Again it's volume 26 in hard format. Sorry,
2 I'm just being told my voice is difficult to -- can you
3 hear me, Mr. Shatter?

4 A. Yes. No, you're fine.

5 679 Q. You'll see there on 7256 that this is a statement that 15:42
6 was made by Sergeant Maurice McCabe on Monday, 24th May
7 be 2014. And I just want to bring that statement to
8 your attention in the context of the evidence that
9 you've given this afternoon. Have you found that
10 statement, Mr. Shatter? 15:42

11 A. I do. I don't know whether part of the papers you have
12 included the actual direction that was given, I don't
13 know was it part of these papers.

14 680 Q. Well, can I just perhaps supply the context and the 15:43
15 reason why I'm putting this, Mr. Shatter?

16 A. Certainly, yes.

17 681 Q. This afternoon you gave evidence to the Chairman here
18 that at the time of the penalty point controversy and
19 in particular I think when you were speaking in the
20 Dáil as we've just noted now, that the whistleblowers, 15:43
21 or at least Maurice McCabe was anonymous and that he
22 wasn't identified as the person who had actually
23 brought to light these particular matters of public
24 interest, isn't that so?

25 A. That was the position during 2012 through into 2013 15:43
26 until Maurice McCabe came out himself in public for the
27 Public Accounts Committee as far as I can recollect.
28 But you should have from Sergeant McCabe copies of the
29 letters that he furnished to the Department of

1 Transport and the Taoiseach's department in the summer
2 of 2012 in which he insisted on his anonymity. There
3 was a letter that he sent to Mr. Varadkar, who was then
4 Minister for Transport, in early November of 2012,
5 again asking for confidentiality or anonymity. And 15:44
6 that was something that I respected and adhered to.
7 And had I not done so, I think my political life might
8 have been a lot simpler. I didn't make a public issue
9 out of it, because I had no wish to have any row about
10 it. But this is why Michael Flahive sent a letter 15:44
11 urging Sergeant McCabe to engage with his authorities
12 and this is why we were trying to encourage that he
13 volunteer to engage effectively with Assistant
14 Commissioner O'Mahony without -- I was very anxious
15 also that he wasn't put under any pressure, because I 15:44
16 was conscious of his entitlement to an anonymity. I
17 was also conscious that in the background there existed
18 two sets of court proceedings that Sergeant McCabe had
19 taken both against the Garda Commissioner and one
20 against my predecessor as Minister for Justice. So I 15:45
21 was trying to deal with care and caution with issues
22 raised by Sergeant McCabe and trying to get to the
23 truth of those issues.

24 682 Q. whilst he may have requested anonymity, Mr. Shatter,
25 was that in fact the case to your knowledge? 15:45

26 A. Oh, to my --

27 CHAIRMAN: I'm just wondering, Mr. Gordon, are you
28 making a different case that he hadn't sought
29 anonymity?

1 MR. GORDON: No, no. No, no. I mean, it's clearly the
2 case that he did. There is no issue about that.

3 CHAIRMAN: He did. Okay. All right. Well then, he
4 did.

5 683 Q. MR. GORDON: But what I want to know in fact was: Was 15:45
6 Maurice McCabe, Sergeant McCabe in fact anonymous at
7 the time --

8 A. In every --

9 684 Q. -- to your knowledge?

10 A. In everything that I did, I sought to protect his 15:45
11 anonymity. In everything I did. Now, quite clearly,
12 based on the evidence or the engagement that

13 superintendent, or I should say Assistant Commissioner
14 O'Mahony had with the PAC in 2014, quite clearly
15 sometime in January or February 2013 he at least 15:46
16 suspected that Sergeant McCabe was the complainant.

17 And I think and I understand from what was said that
18 that was linked to the issues that arose with regard to
19 the running off of information from the Pulse system
20 and the direction that was given to Sergeant McCabe in 15:46
21 relation to that.

22
23 But as far as I was concerned, as I went through 2012
24 into 2013 and dealt with matters, Sergeant McCabe had
25 maintained his anonymity up to -- in public he finally 15:46
26 came out, I should say, with the PAC committee; his

27 anonymity went on the ticket charge issue in April of
28 2014 -- no, April of 2013, when he himself phoned
29 Assistant Commissioner O'Mahony to complain he hadn't

1 been interviewed. So up to that point, as far as I
2 knew, he was anonymous within the Gardaí as the
3 complainant. It emerged in the PAC that obviously
4 O'Mahony earlier expected he was the Complainant.

5 685 Q. Can I suggest to you that that might not have in fact 15:47
6 been the case - and I'll put the statement to you now.
7 But as I understand your evidence, you were aware that
8 Sergeant McCabe had sought anonymity, you say that you
9 did everything in your power to see that that would be
10 the case and I'm suggesting to you that the Garda 15:47
11 Síochána authorities knew that it was Sergeant McCabe
12 who was making these allegations. In other words, he
13 wasn't anonymous?

14 A. Well, I can only say what I know of the evidence given
15 by Assistant Commissioner O'Mahony to the PAC as given 15:47
16 in 2014 and when I subsequently learned of it when I
17 read the transcript. There was never a conversation
18 between the time when the O'Mahony -- between the time
19 when I wrote to the Garda Commissioner - to get this
20 right - in October of 2012 and the publication of the 15:48
21 O'Mahony report in 2013, there wasn't a time of a
22 conversation with the Garda Commissioner about the
23 identity of Sergeant McCabe until I learned of the
24 Taoiseach's e-mail and his exchange with Assistant
25 Commissioner O'Mahony. 15:48

26 686 Q. I see.

27 A. And that e-mail came from the Taoiseach's -- I think it
28 was an e-mail - speaking from recollection now - I
29 think it was an e-mail that Sergeant McCabe sent to the

1 Taoiseach's Department in April of 2013 which the
2 Taoiseach's Department passed on to the Department of
3 Justice.

4 687 Q. All right. I think you now have in front of you 7256,
5 Mr. Shatter. That's the statement I referred to a 15:48
6 moment ago, the statement of 24th February '14. Can I
7 just go through some aspects of that statement with
8 you? You'll see in the first paragraph there that
9 Sergeant McCabe refers to the fact that his attention
10 was drawn by members of the media to a statement or 15:49
11 press release that came out on that date. He refers to
12 the statement as being unheaded. And he said that it
13 suggested the Garda Commissioner wrote to him 14 months
14 ago and told him to co-operate with the investigation
15 into the allegation that penalty points had been 15:49
16 cancelled.

17
18 The next paragraph says it "claims that the
19 Commissioner issued a direction to me to co-operate
20 with the investigation being carried out by the 15:49
21 Assistant Commissioner and directing me to bring any
22 information or concerns I had to the inquiry team."

23
24 Do you see all that?

25 A. Mm hmm. 15:49

26 688 Q. And then it goes on to say - this is Maurice McCabe now
27 speaking about the statement that he's reading - it
28 goes on to say that:

29

1 "The Garda Síochána is a disciplined force and members
2 are required to comply with directions issued by the
3 Commissioner, implying that I wrongfully failed to
4 comply with the Commissioner's direction to cooperate.
5 The statement further suggests that I did not comply 15:50
6 with the Commissioner's direction during the period
7 when I was on sick leave and that I did not contact the
8 Assistant Commissioner until April 2013" - which I
9 assume is a reference to Assistant Commissioner
10 O'Mahony - "by the time at which the investigation had 15:50
11 been completed. "

12
13 He says this then:

14
15 "I was never directed by the Commissioner to co-operate 15:50
16 with the O'Mahony investigation as alleged. "

17
18 He says:

19
20 "On 14th December 2012 I was asked to remain back after 15:50
21 duty in Mullingar Garda Station to meet with Chief
22 Superintendent Mark Curran. I did so. When he
23 arrived, he read me out a document. I have,
24 fortunately, a full record of what transpired and it is
25 attached to this statement. As appears from the 15:50
26 record, the Chief Superintendent refused my request to
27 furnish me with a copy of that document. I presume
28 that this was in accordance with his superiors'
29 instructions. The fact that I was denied a copy of the

1 direction may have encouraged the author of this
2 statement issued today about me to grossly misrepresent
3 the terms of the Commissioner's directions as read out
4 to me and recorded by me.

5
6 I was never contacted by anyone conducting the O'Mahony
7 investigation, which completed its report without
8 making any attempt to speak to me or to seek my input
9 or co-operation into its inquiries. I never withheld
10 any information or co-operation from the O'Mahony
11 investigation, as is now suggested. When I learned
12 that its report had been completed without making any
13 attempt at all to contact me, I protested at what had
14 happened, as the record shows".

15 CHAIRMAN: All right. Well, Mr. Gordon I do understand
16 that. And I do understand that what is referred to
17 there is 14th December 2012.

18 MR. GORDON: Yes.

19 CHAIRMAN: Pulse access was restricted to Maurice
20 McCabe. And to another individual, yes. So there's a
21 question you have for Mr. Shatter?

22 689 Q. MR. GORDON: Yes. Now, just looking at that particular
23 statement that was made by Maurice McCabe in 2014, it's
24 clear that he's referring to the fact that the
25 Commissioner maintained that he was to co-operate with
26 the O'Mahony Commission, but in fact Maurice McCabe
27 vehemently denies that any such direction was given to
28 him. Do you see that?

29 A. Hmm.

1 690 Q. And I think that at a later point in time you accepted,
2 did you not, that Maurice McCabe wasn't in fact
3 directed to do that?
4 A. Well, I think probably the right person to comment on a
5 statement issued by the Garda Commissioner to which 15:52
6 Sergeant McCabe responded to is Sergeant McCabe. But
7 there are two things I'd simply note about this
8 statement: He doesn't reference the fact that he sought
9 anonymity when he made the complaints he made; and
10 secondly, I have a very careful, I think, memory - I 15:52
11 don't have it in front of me here - of the direction
12 issued by the Garda Commissioner and Sergeant McCabe,
13 of course, is partially right in what he said.
14
15 The document, from my recollection, was headed 15:53
16 "Direction" I think. In the context of it, he was
17 directed - and I'm paraphrasing it now, I'm not using
18 probably the language of what was said to him - he was
19 directed to, I think, not distribute further Pulse,
20 further material from Pulse. My memory is towards of 15:53
21 end of that particular document he wasn't directed to
22 engage - so Sergeant McCabe is right in this - he
23 wasn't directed to engage with Assistant Commissioner
24 O'Mahony, he was invited to engage.
25 691 Q. I think the point, Mr. Shatter -- 15:53
26 A. Well, let me finish please.
27 692 Q. I don't want to cut across you --
28 A. You asked me a question, let me finish.
29 693 Q. The point that, I want you to understand the point --

1 A. He was invited to engage with Assistant Commissioner
2 O'Mahony. And so he wasn't told 'You must engage', he
3 was effectively invited to engage. So the statement
4 that he's issued, unfortunately in its content, doesn't
5 tell the true story and the full story of the nature of 15:54
6 the engagement that occurred in and around that
7 direction. But it is correct in saying he wasn't
8 directed to engage with Assistant Commissioner
9 O'Mahony, it was a direction not to distribute more
10 material from the Pulse system outside the Garda 15:54
11 Síochána and an invitation that if he had issues that
12 he wished addressed, to engage with Assistant
13 Commissioner O'Mahony. It was as straightforward as
14 that.

15 694 Q. The reason I put that statement to you, Mr. Shatter -- 15:54
16 MS. LEADER: Sorry, I don't want to interrupt anybody,
17 but there is an actual copy of the direction contained
18 in the documents at page 3033. It's on the Spotlight
19 system, if it's of assistance.

20 MR. GORDON: Thank you for that, Ms. Leader. 15:55

21 CHAIRMAN: Thanks for pointing that out Ms. Leader.

22 MS. LEADER: volume 11.

23 CHAIRMAN: Yes, I simply regard it as one of the
24 historic events -- sorry, they're not historic, of
25 course; "historical" meaning part of the narrative 15:55
26 leading up to it.

27 695 Q. MR. GORDON: Yes. The point that arises from this
28 particular statement, Mr. Shatter, is the fact that
29 Maurice McCabe, if this is correct, the statement, was

1 not anonymous in --

2 A. Sorry, I beg your pardon, I missed what you said there.

3 696 Q. He was not anonymous. In fact his anonymity was gone
4 by December 2012, if that statement is in fact correct.

5 A. No. 15:55

6 697 Q. But here you are in October --

7 A. The engagement --

8 698 Q. Let me at least ask the question --

9 A. No, the engagement on December 2012, as I understand
10 it, and it's clear from the statement, related to an 15:55
11 issue of accessing material on the Pulse Garda computer
12 system that was confidential and a concern about it
13 getting, being distributed outside the Garda
14 organisation.

15 699 Q. Yes. 15:55

16 A. That's what -- that engagement wasn't, as I understand
17 it, dealing with the issue of the complaints made by
18 Maurice McCabe and it wasn't an engagement involving
19 Assistant Commissioner O'Mahony. But I mean, these are
20 questions to ask Assistant Commissioner O'Mahony and 15:56
21 Martin Callinan if and when they appear to give
22 evidence. I'm only detailing what I know of these
23 events. And what I know of these events, I can only
24 derive from the wording of the document.

25 700 Q. The direction to refrain from using the pulse system 15:56
26 was inextricably, as you know, linked to the penalty
27 points controversy. The point I'm putting to you,
28 Mr. Shatter, is this: That in December 2012 the Garda
29 Síochána authorities knew exactly who Maurice McCabe

1 was, they knew that he was complaining, they knew that
2 he was using Pulse system, according to this document,
3 and he was given certain directions in relation to it -
4 as Ms. Leader has pointed out, there's documents here
5 that confirm all of that. But in October of the 15:56
6 following year you are in Dáil Éireann speaking about
7 these events, you're here this afternoon discussing
8 these events as if Maurice McCabe was in fact anonymous
9 at the time. But he clearly wasn't.

10 A. At that point, as far as the public were concerned, he 15:57
11 was anonymous. As far as the broad range of members of
12 the Garda force were concerned, I assumed he was
13 anonymous. In October 2013 he was -- the fact that he
14 was the complainant was clearly known to the Garda
15 Commissioner, was clearly known to Assistant 15:57
16 Commissioner O'Mahony by virtue of his own engagement
17 with him. But the general public, as far as the
18 general public was concerned, all of this information,
19 all these allegations derived from an anonymous
20 whistleblower. And I continued in my dealings with the 15:57
21 issue, in my reference to them, even if what I had to
22 say didn't please Sergeant McCabe in full, I continued
23 to protect his anonymity and did not reference him by
24 name. Nor, indeed, as far as I know, during 2013 or
25 2012 did any other member of the Houses of the 15:58
26 Oireachtas mention him by name.

27 701 Q. Mr. Shatter, can I just ask you to deal now with the
28 visit to Ms. D's house at the request of -- or I think
29 it was in a hotel, the Merrion Hotel, at the request

1 of --

2 A. No, I didn't visit her house. I met her in the Merrion
3 Hotel, yes.

4 702 Q. Sorry, I was just about to correct myself there.

5 A. Yes. 15:58

6 703 Q. And we know that you have taken some notes - you've
7 produced those to the Tribunal.

8 A. They were notes taken by Jane Lehane, my special
9 advisor. She took them during the course of the
10 meeting that took place. So the notes, the written 15:58
11 note is contemporaneous, the typed note was only typed
12 recently so that the reading could be legible.

13 704 Q. They're on 7219.

14 A. No, I'm not sure I have them in front of me.

15 705 Q. Well, can I just ask you to look at the hard copy that 15:59
16 you have?

17 A. No, I'm not even sure I have them in hard copy. I
18 think my solicitor may have them. Are they on screen?
19 Sorry, which volume is it?

20 MS. LEADER: 26. 15:59

21 A. 26? So it's this volume I'm looking at at the moment,
22 is it? Yes. What page on 26?

23 706 Q. MR. GORDON: 7219.

24 A. 7219. Yes.

25 707 Q. Now, this particular encounter, Mr. Shatter, as I 15:59
26 understand it, took place at the request of Paul
27 Williams in the first instance, is that right?

28 A. Well, Paul Williams contacted me and informed me that
29 Ms. D - she wasn't called Ms. D at the time - but that

1 she wished to meet with me.

2 708 Q. All right. And I think you knew that Ms. D at least
3 wasn't a constituent of yours?

4 A. I did, yes.

5 709 Q. And I think you knew that in advance of this particular 16:00
6 meeting?

7 A. Oh, he would've told me that she came from the
8 Cavan/Monaghan area. I can't remember exactly what he
9 said, but I knew she wasn't a constituent, yes.

10 710 Q. And just when that request was being made of you, 16:00
11 Mr. Shatter, to visit Ms. D, did you make any
12 connection in your mind between --

13 A. I connected it with the article --

14 711 Q. Just let me finish the question, Ms. Shatter --

15 A. -- that Paul Williams had been writing, yes. 16:00

16 712 Q. Did you make any connection in your mind between this
17 particular person here and the information that had
18 been shared by the Commissioner with you?

19 A. Yes, I think I said that when I saw Paul Williams'
20 articles, I assumed that it was likely that that was 16:00
21 the person concerned, the one that the -- arising out
22 of the brief conversation that I'd had with the
23 Commissioner. I presumed this was all related, yes.

24 713 Q. And this proposed visit was a number of weeks after
25 your resignation as Minister? 16:01

26 A. Oh, he contacted me in June of 2014. I can't give you
27 the exact date in June, but I think within a few
28 days --

29 714 Q. It was very shortly after?

1 A. Well, it was within a few days of him contacting me I
2 met with her. So certainly I'd resigned, it was only a
3 short few weeks after my resigning, yes.

4 715 Q. All right. And whilst you knew that there may have
5 been some connection between this particular lady who 16:01
6 you were about to meet with and the information that
7 had been given to you by the Commissioner, it
8 automatically follows from all of that that you knew
9 that the information was associated with Sergeant
10 McCabe? 16:01

11 A. Yes.

12 716 Q. And was it for that reason that you went to meet with
13 her?

14 A. No, I went to meet with her because Paul Williams told
15 me that he had met with her - I'd read these articles - 16:02
16 and there was an allegation that her complaint hadn't
17 been properly investigated. Now, my recollection at
18 the time, I don't know whether this is right or wrong,
19 but there was, I think, a complaint also that whatever
20 investigation had occurred hadn't been referenced on 16:02
21 Pulse. I don't know if that's right or wrong, I'm not
22 making that allegation, just that was my recollection.
23 And he asked me would I meet with her and I said I
24 would. And that's how the meeting came about.

25 717 Q. Is this something you would normally do or have done in 16:02
26 your --

27 A. Throughout my political life I've treated my -- or my
28 former political life, which Mr. Guerin brought to an
29 end, I managed, I always dealt with issues from a

1 national perspective, not just from a constituency
2 perspective. I met people in difficulties with all
3 sorts of concerns and issues from all over the country
4 in the context of the various briefs I had as Fine Gael
5 Spokesperson for Health, the Environment, all sorts of 16:03
6 different areas, Labour, as well as Justice and Law
7 Reform. I didn't regard being involved in politics as
8 simply being engaged with the parish pump and not being
9 a national legislator involved in national issues. So
10 there was absolutely nothing unusual with me meeting 16:03
11 with someone from outside my constituency. I regularly
12 met groups lobbying for all sorts of social law reform
13 outside my constituency.

14 CHAIRMAN: All right. Well, look, I can accept that, I
15 don't see there's anything wrong. If one looks at 16:03
16 issues that I've raised in the last two to three weeks,
17 it's clear that some things transcend, or may transcend
18 the particular constituency. I would've thought Dáil
19 Éireann representatives are there to represent the
20 people, not just a parish. Anyway, Mr. Gordon, you're 16:03
21 along the way.

22 718 Q. MR. GORDON: Thank you, Chairman. What I'm interested
23 in, Mr. Shatter, is why either Mr. Williams or Ms. D
24 had selected you as the person to discuss these
25 particular issues with? 16:04

26 A. I understood from Mr. Williams - and I think he may
27 have mentioned this to me - that because of what
28 happened to me, as it was put, at the hands of Sergeant
29 McCabe, she wanted to meet with me.

1 719 Q. I see. And looking at the notes, it doesn't appear
2 that you ever questioned that when you arrived and in
3 fact met with her.
4 A. Sorry, I never questioned what?
5 720 Q. You don't appear to have recorded any notes about that 16:04
6 particular issue when you in fact met with her.
7 A. No, I recorded no notes. I was meeting a very
8 distressed individual who had a story to tell and who
9 was clearly, clearly under a great deal of personal
10 difficulty and I took no notes at all. And as is my 16:04
11 habit on occasions and as frequently as happened when I
12 met with groups or individuals, Jane Lehane was there,
13 she took down little jotted heading notes of the
14 meeting. I think afterwards she asked me was there
15 any -- did I want her to type up the notes and I said 16:05
16 'No, there's no need to'.
17
18 And these notes were only recently found in a box, the
19 written notes. I asked her some time ago were there
20 any notes available of that meeting, any record of the 16:05
21 meeting and did it still exist - because when I ceased
22 to be a TD, a lot of the stuff we had, we just cleared
23 out - and these notes were found in an old box that
24 she'd kept of some of my former stuff from Leinster
25 House. 16:05
26 721 Q. But why was she interested in meeting you, do you know?
27 Did you find that out at the meeting?
28 A. Yeah, I just --
29 722 Q. Why were you selected as the relevant --

1 A. As the former Minister for Justice, as someone who over
2 the years had been very much engaged in addressing
3 issues of child abuse, as someone who's responsible for
4 a lot of legislation in that area, I think she felt
5 that I was someone who could actively be of assistance 16:06
6 to her in having the nature of the investigation
7 conducted based on her allegation examined and looked
8 into. I mean, ask her that question.

9 723 Q. This had nothing do with your resignation then, had it,
10 this meeting? 16:06

11 A. No, it had nothing to do with my resignation. But
12 certainly the comment was made that she wanted to meet
13 with me because of what Maurice McCabe had done to me
14 was the way it was put frankly.

15 724 Q. Well, you knew when you were about to meet with this 16:06
16 particular person that she was going to say very
17 unpleasant things about Sergeant McCabe; you knew that
18 much?

19 A. Oh, I've met people who have had very unpleasant things
20 to say about all sorts of people and I'm very discrete 16:07
21 in how ideal with that. Should I have refused to meet
22 someone who is alleging their issues weren't properly
23 investigated? Because, I mean, I don't know what the
24 point of that is or what the purpose of that is.

25 725 Q. Well, the point is this then: If that is the reason, 16:07
26 Mr. Shatter, why did you raise this particular matter
27 then in Dáil Éireann in a debate in relation to the
28 bugging of GSOC?

29 A. Because, because -- well, firstly, it was raised. I

1 used that format of that debate to address issues
2 arising from both the Cooke and the Guerin Report.
3 That when the Guerin Report was debated in the Dáil I
4 was in no state of mind to be able to deal with it or
5 address it. That debate was concerned, as I 16:07
6 contributed to it, with the terms of reference also of
7 what investigation Mr. Guerin would conduct. I raised
8 in that debate a whole range of difficulties and
9 problems I had with the manner in which Mr. Guerin had
10 gone about his business and I made some suggestions as 16:08
11 to what should happen with regard to the commission of
12 investigation. And the commission of investigation was
13 going to be into events that took place in Bailieboro.
14 And her allegation related to an event that took place
15 in Bailieboro and it related to an allegation that a 16:08
16 complaint she made had not been properly investigated.
17 And I decided that I had some duty to this young
18 distressed woman to raise the possibility of the issue
19 being dealt with in whatever commission of
20 investigation would take place in a manner that caused 16:08
21 no difficulty or embarrassment to anybody and, as I
22 said, which didn't make me the object of net another
23 media frenzy. And essentially that was my judgment and
24 that is how I dealt with it. And sadly what I did was
25 infective, because had I been listened to and if that 16:08
26 matter had been dealt with by the O'Higgins
27 Commission --

28 726 Q. Thank you for that.

29 A. -- some of the issues that this Tribunal has had to

1 deal with perhaps would never have arisen or at least
2 would have been dealt with a great deal earlier.

3 727 Q. Just one final matter, Mr. Shatter; in relation to the
4 DPP's directions, you said twice this afternoon that
5 the directions from the DPP were to the effect that 16:09
6 this was an allegation that had been made without any
7 basis. There was no basis for a prosecution, I think
8 were the words.

9 A. No. Yes, sorry, what Martin Callinan and I would have
10 said -- 16:09

11 728 Q. Did you in fact know or had you ever seen the DPP's
12 direction?

13 A. No.

14 729 Q. Did you know in fact that the DPP had directed that the
15 allegation didn't even disclose a crime? 16:09

16 A. No, no, I'd never seen it. What I was told was the DPP
17 had said there was no basis for a prosecution. I took
18 that, I'm as a lawyer, to mean what it said; no basis
19 for a prosecution, no prosecution warranted. But the
20 words used to me were no basis for prosecution. 16:09

21 MR. GORDON: Thank you, Mr. Shatter.

22 CHAIRMAN: All right, thanks.

23

24 THE WITNESS WAS THEN CROSS-EXAMINED BY MS. BURNS

25 730 Q. MS. BURNS: Chairman, I have a few short questions. 16:10
26 Mr. Shatter, my name is Tara Burns and I am appearing
27 on behalf of Superintendent David Taylor. Just in
28 relation to the conversation which you had with former
29 Commissioner Callinan in relation to you raising

1 whether there was anything in the background of
2 Sergeant McCabe that you should have been made aware
3 of, I take it that you didn't think that that was an
4 inappropriate query for you to raise with Mr. Callinan?

5 A. Not in the context of what I would describe as the 16:10
6 enormous difficulties that were being experienced --
7 sorry, excuse me, I have a little bit after mixture of
8 hay fever and asthma, so this is why my voice is
9 sounding weird. Not in the context of the difficulties
10 being experienced in dealing with issues raised by 16:10
11 Sergeant McCabe. I don't want to go back through it
12 all over again. I was trying to get a handle on why
13 things were so unnecessarily complex, why they were so
14 erratic, why could it be his solicitors weren't
15 responding to letters about an issue sometime earlier 16:11
16 he seemed to be very exercised about? So I asked the
17 question simply was there anything in the background?
18 I had no idea what answer I was going to be given. The
19 the answer is as I describe and it was very brief, and
20 our conversation moved on. I mean, that was the extent 16:11
21 of it.

22 731 Q. And I take it from your statement that you don't see it
23 as it being inappropriate what you heard from
24 Mr. Callinan either?

25 A. Mr. Callinan put it in a manner that was, I would say, 16:11
26 sympathetically disposed towards Sergeant McCabe. He
27 put it in a manner to suggest basically look, this man
28 is upset. There was nothing about him having an
29 agenda, there was nothing about him being malicious,

1 there was nothing -- to use the words that I've been
2 hearing and reading in the last few days, revenge.
3 None of that was an issue.

4 732 Q. I see.

5 A. My understanding of our brief exchange was that there 16:12
6 was a perception that Sergeant McCabe had his own
7 personal difficulties and that this may be why the
8 engagement is erratic and difficult. It wasn't in any
9 way to do him down and there was no suggestion of any
10 description that the allegation made should have been 16:12
11 prosecuted in any shape or form. It was very a simple
12 straightforward conversation.

13 733 Q. And then in terms of when you think that conversation
14 took place, I see from your statement you put it as
15 after the O'Mahony report was published? 16:12

16 A. Yeah. The O'Mahony report was published May '15. I
17 think -- I mean, the best of my recollection is that
18 this was a June conversation that I had with the
19 Commissioner on the phone. And that it wasn't the main
20 purpose of the conversation; it was something raised by 16:12
21 me almost as an afterthought in the context of us
22 discussing other issues.

23 734 Q. Yes?

24 A. And I am pretty certain it was after publication of
25 O'Mahony and all the brouhaha that arose following on 16:13
26 from its publication.

27 CHAIRMAN: The O'Mahony report was published on 15th
28 May --

29 A. 15th May.

1 CHAIRMAN: -- 2013.

2 A. Sorry, 2013. So it would be June 2013.

3 735 Q. MS. BURNS: June 2013?

4 A. Yes, I am getting my years wrong. June, 2013.

5 MS. BURNS: Thank you very much. 16:13

6 MR. GILLANE: I have no questions.

7 CHAIRMAN: Any questions?

8 MS. BARRINGTON: I have no further questions, thank

9 you, Chairman.

10 CHAIRMAN: Well, if you would, you'll have them at the 16:13

11 end, but is there any from the Garda?

12 MR. DIGNAM: Chairman, I have a few brief questions.

13

14 THE WITNESS WAS THEN CROSS-EXAMINED BY MR. DIGNAM

15 736 Q. MR. DIGNAM: Mr. Shatter, I am Conor Dignam, I appear 16:13

16 on behalf of An Garda Síochána and I just want to cover

17 a few areas quite briefly with you.

18 A. Sure.

19 737 Q. And in particular in relation to the O'Mahony process

20 and this question of cooperation or engagement, lest it 16:13

21 be relevant to the work of the Tribunal. You had an

22 exchange with Mr. Gordon in relation to this, the

23 question of when Sergeant McCabe's name became known

24 and the point was put to you that he was no longer

25 anonymous from a date in 2012. Do I understand your 16:14

26 case or your position to be that irrespective of

27 whether his name was known by a small group of people

28 or a large group of people, that didn't give you

29 licence to disregard the anonymity to which he was

1 entitled?

2 A. No, absolutely. And he continued to be anonymous to
3 the public until 2014.

4 738 Q. Yes. And you felt it your duty to continue to, in your
5 interactions and in your statements to treat him with 16:14
6 anonymity?

7 A. Yes. And I respected his wishes. And you will see in
8 any statements that I issued, including comments I made
9 subsequent to publication of O'Mahony, I always made
10 reference to the whistleblower. And in the statement 16:15
11 issued when the O'Mahony report was published, I
12 reference the importance of whistleblowers feeling free
13 to raise issues of concern without feeling under threat
14 in any shape or form. And I very specifically said
15 that, because I was very conscious of the constant 16:15
16 insistence by Sergeant McCabe on anonymity.

17 739 Q. Now, you were also asked by Ms. Leader in relation to
18 your apology, your public apology to Sergeant McCabe.
19 And in the course of that exchange with Ms. Leader, you
20 explained how you learned that in fact Assistant 16:15
21 Commissioner O'Mahony probably knew that it was
22 Sergeant McCabe making these complaints at an earlier
23 stage and that he could possibly have gone about his
24 business --

25 A. Yes. 16:16

26 740 Q. -- a slightly different way. Could I ask you to look
27 at page 7170? It's in Volume 26. This is Assistant
28 Commissioner O'Mahony's statement to this Tribunal.

29 A. Yes.

1 741 Q. It starts on page 7167 but if I could ask you to 7170.
2 A. Yes, I have that.

3 742 Q. In the middle paragraph on that page Assistant
4 Commissioner O'Mahony acknowledges that he, to all
5 intents and purposes, knew or had heightened suspicions 16:16
6 that it was Sergeant McCabe --

7 A. Yes.

8 743 Q. -- and Garda Wilson making these allegations. And what
9 he says is that:
10
11 "Therefore, and in light of what I had established
12 during the course of my examination and from my
13 knowledge of other events, such as the aforementioned
14 occurrence at Cavan Garda station, I was aware of Garda
15 Wilson and Sergeant McCabe and whereas I did suspect 16:17
16 that in all probability that one or other, or indeed
17 both of them were the authors of the material that I
18 was examining, I did not have any formal or factual
19 information connecting these member to the anonymous
20 allegations I had been tasked by the Commissioner to 16:17
21 examine. At no stage during my examination did anyone
22 identify themselves in public or otherwise as the
23 authors of the anonymous allegations. While I may have
24 had a suspicion that the persons making the allegations
25 were the same people who were in contact with the 16:17
26 confidential recipient, I had to remain mindful of due
27 process and the confidential requirements of that
28 process. It would have been preferable had they come
29 forward and engaged with my expectation but in any

1 event they didn't. I was fully cognisant and mindful
2 of my responsibilities under the Garda Síochána
3 Confidential Reporting of Corruption and Malpractice
4 Regulations 2007, established in accordance with the
5 Garda Síochána Act 2005, as amended. I was acutely
6 aware of, and duty bound by, the provisions of these
7 regulations governing the protection of the
8 confidential reporters' identity. The provisions of
9 Regulations allow for the identity of confidential
10 reporters to be disclosed only in exceptional and
11 distinct circumstances and only then to the Minister or
12 the Commissioner. Such a disclosure must meet the
13 criteria of being necessarily essential for the proper
14 examination of the confidential report or the
15 investigation of corruption or malpractice alleged. "

16:17

16:18

16:18

17 Now, does the attitude displayed in that paragraph of,
18 whilst I knew who it was, I still had to treat them as
19 confidential and anonymous, does that reflect your
20 general attitude to the maintenance of anonymity and
21 confidentiality?

16:18

22 A. Yes. And I respect what Assistant Commissioner
23 O'Mahony has said and I don't want what I have said to
24 be regarded as a criticism of him. Because I can well
25 understand, I think, I hope I said this earlier, how in
26 his circumstances he may have felt that he couldn't
27 take issue any further.

16:18

28 CHAIRMAN: Look, I think the reality is you are pushing
29 an open door. It happens, for instance, it used to

1 happen certainly in rape cases that the indictment
2 would be read out in front of 200 people. But that
3 doesn't mean that the person's anonymity is gone. That
4 would be a ludicrous proposition. So I understand.

5 MR. DIGNAM: I may it please you. 16:19

6 CHAIRMAN: If you are asked for that, if you are
7 entitled to it, you keep it, even though something else
8 may happen. It may be different if the person appears
9 outside the Four Courts and makes a statement.

10 MR. DIGNAM: Thank you. 16:19

11 744 Q. If I could move on then, Mr. Shatter. Just towards the
12 end of that statement you referred in your examination
13 by Ms. Leader to Sergeant McCabe having contacted the
14 O'Mahony investigation team.

15 A. Yes, that's in April 2013. 16:19

16 745 Q. Yes. And lest it be relevant, that's dealt with by
17 Assistant Commissioner O'Mahony on page 7172 of his
18 statement. And in that, on the third full paragraph on
19 the page he explains when he concluded his examination,
20 which was March 2013, and when he finalised it, and 16:20
21 that it was sent to the Minister on 28th March and was
22 in fact published on 15th May.

23
24 And he goes on to say that:

25
26 "Sergeant McCabe contacted my office by phone on 23rd
27 April 2013. I missed his call, but reverted to him
28 approximately an hour and a half later. Detective
29 Sergeant Ger Meel ey, my personal assistant at that 16:20

1 time, was present in the office during the call.
2 Sergeant McCabe introduced himself to me as the person
3 who had made the original complaints regarding fixed
4 charge penalties. This was in fact the first time that
5 I formally became aware of the identity of the 16:20
6 anonymous author. Sergeant McCabe wanted to know why
7 he had not been interviewed by my inquiry team. He
8 stated he was aware that I had his list of allegations.
9 I informed him that it was my understanding that the
10 Commissioner had informed him the previous December 16:20
11 that if he had any concerns he should contact me. He
12 stated that this was not true and that his Chief
13 Superintendent told him he had to contact me before
14 contacting anyone else. I informed him this was not my
15 understanding of what he had been told. The 16:21
16 Commissioner's direction does not make any reference to
17 contacting anyone else.
18
19 I informed him that my report had been submitted to the
20 Minister and offered to arrange for him to speak to a 16:21
21 member of my inquiry team if he had anything further to
22 offer. He stated 'You have my list of allegations, I
23 stand over them. Tens of house of SPS done away with
24 corruptly'. He further stated he would be concerned if
25 I didn't find the same as he had. He didn't want to 16:21
26 talk to the inquiry team otherwise.
27
28 Before completing the call, I informed Sergeant McCabe
29 that he could contact me at any time and I would

1 arrange for a member of my inquiry team to speak with
2 him and that I would give him a fair hearing. Sergeant
3 McCabe has not made any contact with me since. Later
4 that day I made a written note of this conversation. I
5 am aware that Detective Sergeant Meeley also made notes 16:21
6 at this time."
7

8 And he goes on in the final paragraph to say that:
9

10 "In the course of my examination, no third party 16:21
11 approached me or any member of my team with any
12 information of relevance to the examination. My
13 examination would, naturally, have incorporated any
14 such approach. Notwithstanding that my final report
15 had already been submitted at the time, if Sergeant 16:22
16 Maurice McCabe had provided me with any further
17 additional material or information, I would have
18 forwarded such material or information to the
19 Commissioner."
20

21 Now, is that your -- does that accord with your
22 knowledge of events?

23 A. Yes, that reflects, I suppose, to some degree of rather
24 odd communication that Sergeant - sorry, my voice is
25 going - that rather odd communication that Sergeant 16:22
26 McCabe engaged in with the Taoiseach's office after his
27 engagement with Assistant Commissioner O'Mahoney.

28 746 Q. Now, again perhaps in this, by the qualification that
29 lest it be relevant to the work of the Tribunal, but if

1 you had received a communication from the Gardaí, and
2 particularly Assistant Commissioner O'Mahoney, to say
3 'Hold off on publishing the report, I have some more
4 information that I want to add into it' or 'I want to
5 review it in light of further information', would that 16:23
6 have been something you would have agreed to?
7 A. There'd have been no difficulty of any description.
8 MR. DIGNAM: Thank you, Mr. Shatter.
9 MS. LEADER: Just --
10 CHAIRMAN: Well, Ms. Barrington, you've got no 16:23
11 questions you need to ask?
12 MS. BARRINGTON: Thank you very much Chairman, I don't
13 have any questions.
14 CHAIRMAN: All right, thank you very much.
15
16 THE WITNESS WAS RE-EXAMINED BY MS. LEADER AS FOLLOWS:
17
18 747 Q. MS. LEADER: Just in relation to the matters which were
19 put forward on behalf of Assistant Commissioner
20 O'Mahoney, as I understand it, the foundation of your 16:23
21 apology to Sergeant McCabe was if Assistant
22 Commissioner O'Mahoney could have had suspicions in
23 relation to the identity of the confidential informant,
24 he should have made all efforts to interview him, is
25 that right? 16:23
26 A. Let me just refine that slightly.
27 748 Q. Yes, no -- yes, certainly.
28 A. It was more based on - and it's very dangerous when
29 you're Minister for Justice to just do this - but it

1 was more based on that if I had been Assistant
2 Commissioner O'Mahoney.

3 749 Q. Yes.

4 A. With the knowledge I had at that point.

5 750 Q. Yes. 16:24

6 A. With the level of public controversy and difficulty
7 that existed, I'd have regarded it as wise to have
8 engaged with the Garda Commissioner and formally asked
9 him to write to the Minister for Justice to ascertain
10 whether the complainant would be willing to formally 16:24
11 come forward and engage with the O'Mahoney
12 investigation. And that was the basis for me making
13 the statement I made in the Dáil. But I totally
14 understand that it was equally valid for Assistant
15 Commissioner O'Mahoney to take a different perspective 16:24
16 and deal with it as outlined to the Commission.

17 751 Q. Just to complete Assistant Commissioner O'Mahony's
18 perspective on matters, I think he said at the bottom
19 of page 7170 if he thought it was necessary for his
20 investigation to contact the confidential informant, he 16:24
21 would have contacted either you or the Commissioner in
22 order to try and interview this person. But he didn't
23 think it was necessary and he thought his report was
24 satisfactory and very much didn't -- was thorough and
25 comprehensive without interviewing the confidential 16:25
26 informant.

27 A. His report was thorough and comprehensive in dealing
28 with all of the process issues.

29 752 Q. Yes.

1 A. Didn't necessarily adequately address the substance of
2 some of the rather exotic decisions that were made
3 that, in my view, were questionable at the time. But I
4 believe he dealt with his work in good faith, with
5 extraordinary speed considering the number of 16:25
6 allegations made and the complexity involved. And I
7 added to the complexity of that, because in addition to
8 his investigating the complaints that Sergeant McCabe
9 made, due to my concern about the ticket charge issue,
10 I had required him, by letter, in December of 2012 to 16:26
11 examine an additional random 1% across the country
12 during a particular timeframe of ticket charge
13 terminations to ascertain whether they suffered from
14 similar frailties to those identified by Sergeant
15 McCabe. So I actually added to his work. 16:26

16
17 And I think the nature of the report he produced and
18 also the Professional Standards Unit of An Garda
19 Síochána, within a very short space of time considering
20 what was involved, was very valuable and I think what's 16:26
21 interesting about the report is, when it came to a
22 further report into the issue in, I think published in
23 January 2015, it was acknowledged that there'd been a
24 sea change in the manner in which the ticket charge
25 issue was being addressed, the way the processing 16:27
26 system was working. And that was later acknowledged by
27 GSOC in their report of December, published December
28 2017.

29 MS. LEADER: Thank you very much, Mr. Shatter.

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

CHAIRMAN: Thanks, Mr. Shatter.

A. Thank you, Judge.

CHAIRMAN: So tomorrow it's ten o'clock, isn't that right? Yes.

16:27

THE HEARING WAS THEN ADJOURNED UNTIL FRIDAY, 18TH MAY
2018 AT 10:00AM

'	159 [1] - 5:14 15th [5] - 31:9, 120:10, 186:27, 186:29, 191:22 16 [2] - 1:6, 86:13 1676 [1] - 116:21 17 [1] - 1:10 17:20 [1] - 83:2 17th [1] - 124:27 17TH [2] - 1:18, 6:1 18 [1] - 2:29 18/12 [1] - 75:15 184 [1] - 5:15 187 [1] - 5:16 18TH [1] - 197:6 18th [1] - 88:2 1921 [1] - 1:10 194 [1] - 5:17 196 [1] - 76:21 199 [2] - 78:1, 78:13 1st [5] - 132:12, 136:25, 138:9, 159:10, 160:24	168:15, 168:24, 168:28, 169:21, 170:1, 171:8, 176:13, 176:24, 187:1, 187:2, 187:3, 187:4, 191:15, 191:20, 191:27 2014 [30] - 1:4, 6:16, 6:17, 13:24, 27:4, 30:8, 78:27, 79:29, 87:25, 100:14, 101:3, 101:8, 101:14, 102:29, 116:26, 132:13, 135:16, 136:16, 140:26, 148:5, 149:15, 150:18, 165:24, 166:7, 168:14, 168:28, 169:16, 172:23, 178:26, 188:3 2015 [1] - 196:23 2016 [10] - 15:12, 16:10, 17:6, 17:28, 21:8, 23:1, 42:26, 53:16, 53:28, 150:7 2017 [6] - 1:6, 1:10, 28:17, 135:7, 158:23, 196:28 2018 [5] - 1:18, 6:2, 29:13, 31:10, 197:7 20th [8] - 15:11, 15:20, 16:10, 16:17, 18:8, 23:12, 54:14, 54:23 21 [1] - 2:25 2162 [1] - 31:10 2165 [2] - 31:7, 31:11 218 [1] - 50:22 21st [3] - 87:25, 90:13, 101:8 22 [4] - 84:12, 84:16, 84:19, 91:17 220 [2] - 51:8, 51:10 221 [2] - 51:10, 51:12 2217 [1] - 89:18 223 [1] - 21:4 229 [1] - 15:10 2290 [1] - 88:12 22nd [5] - 90:19, 90:20, 90:25, 91:3, 91:7 23 [1] - 14:8 232 [1] - 14:7 236 [1] - 50:26 23rd [4] - 27:3, 30:8, 87:19, 191:26 24th [2] - 166:6, 170:6 25 [1] - 75:12 26 [8] - 116:22, 160:1, 160:4, 166:1,	177:20, 177:21, 177:22, 188:27 26th [2] - 136:16, 138:12 271 [1] - 51:12 28th [3] - 28:17, 31:9, 191:21	3 30 [1] - 145:14 3033 [1] - 174:18 32 [1] - 2:12 3233 [1] - 80:17 3323 [1] - 80:15	7242 [2] - 126:22, 159:12 7243 [6] - 126:25, 159:5, 159:13, 159:20, 160:10, 160:11 7244 [2] - 160:18, 163:14 7245 [2] - 126:29, 164:5 7247 [1] - 127:3 7252 [1] - 132:16 7253 [1] - 132:25 7256 [4] - 135:28, 165:29, 166:5, 170:4 7257 [1] - 136:20 7266 [1] - 120:26 7283 [2] - 120:27, 123:13 7287 [1] - 124:9 74 [3] - 84:11, 91:14, 91:17 75% [1] - 9:8 76 [1] - 87:28 77 [1] - 1:18 7th [1] - 77:22
/					
/4 [1] - 81:26	2				
1	2 [6] - 2:25, 3:8, 3:13, 4:4, 4:4, 4:21 20 [1] - 124:27 200 [2] - 141:2, 191:2 2005 [1] - 190:5 2006 [4] - 86:3, 108:8, 144:15, 152:17 2007 [1] - 190:4 2011 [1] - 116:25 2012 [28] - 118:8, 118:16, 118:18, 119:20, 121:1, 121:7, 121:10, 121:17, 124:4, 125:5, 135:23, 135:25, 142:7, 148:23, 161:11, 166:25, 167:2, 167:4, 168:23, 169:20, 171:20, 172:17, 175:4, 175:9, 175:28, 176:25, 187:25, 196:10 2013 [38] - 51:24, 51:28, 118:8, 120:3, 120:11, 125:6, 125:11, 125:15, 126:19, 130:1, 130:28, 132:12, 133:20, 135:1, 136:25, 139:10, 140:9, 140:20, 142:13, 159:11, 160:24, 166:25,				
				8	
				8 [2] - 2:20, 3:23 8,000 [1] - 157:25 89 [1] - 57:20 8th [1] - 81:3	
				9	
				9-15 [1] - 4:16 93 [2] - 91:18, 91:27 96 [1] - 93:11 98 [1] - 93:10 9th [1] - 116:25	
				A	
				abandoned [2] - 41:16, 41:19 abide [1] - 164:18 ability [2] - 83:27, 84:2 able [4] - 25:12, 47:3, 114:16, 183:4 above-named [1] - 1:27 absolutely [12] - 8:16, 9:16, 11:15, 12:9, 43:8, 70:28, 128:6, 128:10, 156:23, 162:2,	

<p>180:10, 188:2 abuse [3] - 49:3, 145:16, 182:3 abuser [2] - 38:16, 38:29 abusing [1] - 70:12 accept [53] - 7:15, 9:4, 12:22, 20:9, 20:14, 20:29, 22:20, 22:25, 23:8, 24:1, 24:9, 24:11, 24:21, 25:19, 27:8, 28:28, 28:29, 40:4, 40:7, 46:26, 47:29, 79:3, 79:4, 94:3, 94:5, 94:13, 94:14, 94:21, 94:25, 94:26, 95:5, 95:12, 95:26, 96:2, 96:4, 96:28, 97:1, 97:11, 100:11, 100:12, 101:2, 105:24, 111:20, 111:26, 112:9, 112:10, 113:21, 113:28, 180:14 accepted [5] - 92:14, 95:10, 100:13, 114:17, 173:1 accepting [1] - 24:12 access [5] - 83:24, 124:21, 132:3, 145:22, 172:19 accessing [1] - 175:11 accidents [4] - 127:24, 127:28, 134:11, 134:18 accompany [1] - 152:2 accord [1] - 193:21 accordance [2] - 171:28, 190:4 according [8] - 32:9, 32:10, 34:27, 90:23, 96:12, 111:11, 125:17, 176:2 accords [1] - 58:24 account [16] - 7:19, 26:15, 26:16, 27:25, 29:12, 31:3, 40:20, 41:4, 41:7, 41:11, 41:20, 62:23, 63:11, 80:28, 103:11, 163:29 accounts [1] - 112:22 Accounts [6] - 132:14, 132:22, 140:29, 148:6, 150:12, 166:27 accurate [5] - 73:24,</p>	<p>98:25, 122:10, 134:3, 134:24 accused [2] - 7:21, 141:2 accusing [2] - 38:12, 38:28 achieve [1] - 97:25 acknowledge [6] - 21:20, 26:1, 137:20, 137:27, 164:7, 164:14 acknowledged [3] - 139:9, 196:23, 196:26 acknowledges [2] - 44:7, 189:4 acknowledging [2] - 128:4, 128:5 ACT [2] - 1:4, 1:9 act [2] - 162:27, 190:5 acted [1] - 152:22 acting [4] - 23:19, 83:19, 83:21, 96:6 action [1] - 1:28 actively [2] - 117:9, 182:5 activities [2] - 100:29, 111:11 ACTIVITY [1] - 4:1 activity [1] - 24:29 actual [4] - 55:15, 99:16, 166:12, 174:17 acutely [1] - 190:5 adamant [3] - 126:9, 129:13, 153:24 adamantly [1] - 143:6 add [2] - 99:8, 194:4 added [2] - 196:7, 196:15 addition [1] - 196:7 additional [3] - 123:6, 193:17, 196:11 additions [2] - 134:28, 135:4 address [6] - 55:20, 55:26, 140:28, 183:1, 183:5, 196:1 addressed [15] - 119:26, 123:24, 131:6, 138:11, 153:6, 159:12, 160:21, 160:25, 160:27, 161:3, 161:22, 161:24, 165:17, 174:12, 196:25 addressee [1] - 142:29 addressing [3] - 121:13, 136:24, 182:2 adduce [1] - 56:26</p>	<p>adequate [1] - 131:9 adequately [1] - 196:1 adhere [1] - 165:23 adhered [1] - 167:6 adjective [1] - 105:8 ADJOURNED [2] - 116:5, 197:6 administering [2] - 128:8, 143:18 admitted [1] - 105:23 advance [4] - 74:2, 85:4, 117:10, 178:5 advices [2] - 93:23, 93:24 advisability [1] - 153:23 advise [1] - 154:9 advised [1] - 93:22 advisor [2] - 146:3, 177:9 advisors [4] - 68:21, 142:16, 146:4, 152:3 advocate [1] - 11:13 affect [1] - 83:27 affected [1] - 103:4 affirmed [1] - 71:9 aforementioned [1] - 189:13 afraid [1] - 158:14 AFTER [1] - 116:8 afternoon [5] - 159:2, 166:9, 166:17, 176:7, 184:4 afterthought [1] - 186:21 afterwards [8] - 39:15, 39:17, 39:21, 79:22, 105:11, 105:13, 115:3, 181:14 agenda [1] - 185:29 agitated [4] - 7:7, 7:8, 8:27 ago [9] - 8:23, 77:9, 106:27, 144:12, 144:16, 170:6, 170:14, 181:19 agree [11] - 8:8, 9:13, 17:8, 18:6, 18:20, 23:5, 25:3, 37:2, 46:9, 96:7, 127:8 agreed [6] - 6:18, 18:4, 19:13, 54:25, 194:6 agreeing [1] - 62:15 agreement [1] - 142:27 ALAN [3] - 4:19, 5:12, 116:18 Alan [2] - 116:10,</p>	<p>132:20 alarmed [1] - 130:12 alarming [1] - 143:14 alert [1] - 38:20 align [1] - 42:18 aligning [1] - 42:17 ALISON [2] - 2:17, 2:27 allegation [35] - 29:3, 30:3, 40:24, 46:14, 47:14, 47:25, 47:27, 70:6, 70:11, 70:17, 84:24, 85:15, 86:3, 127:5, 129:14, 134:16, 134:19, 143:7, 144:17, 145:3, 145:11, 145:26, 146:11, 152:24, 154:8, 170:15, 179:16, 179:22, 182:7, 183:14, 183:15, 184:6, 184:15, 186:10 allegations [51] - 9:2, 41:1, 45:21, 49:2, 64:22, 71:7, 119:21, 119:28, 121:14, 122:2, 122:10, 122:27, 123:23, 124:5, 127:21, 127:23, 127:27, 128:1, 128:16, 128:17, 131:4, 133:1, 133:7, 134:8, 134:10, 134:22, 136:29, 138:2, 141:6, 144:21, 145:15, 145:18, 146:18, 147:8, 148:21, 148:29, 153:27, 154:13, 164:27, 165:1, 165:6, 165:16, 169:12, 176:19, 189:8, 189:20, 189:23, 189:24, 192:8, 192:22, 196:6 alleged [13] - 30:5, 39:25, 71:7, 71:10, 71:14, 107:29, 108:6, 120:20, 141:1, 149:2, 152:20, 171:16, 190:15 allegedly [7] - 14:19, 71:8, 71:14, 107:11, 115:13, 145:5, 152:16 alleging [3] - 127:19, 128:27, 182:22 allow [2] - 157:5, 190:9 allowed [1] - 124:14</p>	<p>almost [3] - 110:3, 112:15, 186:21 alter [1] - 135:8 alteration [1] - 134:27 altered [1] - 135:3 altering [1] - 128:19 alternative [1] - 105:10 amen [1] - 96:23 amended [1] - 190:5 analysis [1] - 101:10 AND [4] - 1:4, 1:5, 1:9, 3:4 Andrew [10] - 32:20, 33:10, 39:7, 43:4, 43:5, 107:12, 114:2, 114:19, 114:25, 115:23 Andrew's [1] - 114:19 angry [1] - 67:18 announced [1] - 150:6 announcement [1] - 147:26 annoyance [1] - 67:26 annoyed [5] - 67:14, 67:16, 67:18, 109:12 annoying [1] - 96:16 anonymity [29] - 119:25, 119:27, 120:2, 122:28, 129:22, 131:23, 136:10, 136:11, 138:24, 139:25, 143:10, 157:17, 167:2, 167:5, 167:16, 167:24, 167:29, 168:11, 168:25, 168:27, 169:8, 173:9, 175:3, 176:23, 187:29, 188:6, 188:16, 190:20, 191:3 anonymous [16] - 166:21, 168:6, 169:2, 169:13, 175:1, 175:3, 176:8, 176:11, 176:13, 176:19, 187:25, 188:2, 189:19, 189:23, 190:19, 192:6 answer [23] - 15:8, 21:25, 21:27, 58:11, 87:28, 92:10, 92:13, 92:24, 93:1, 93:5, 94:8, 94:11, 94:12, 94:18, 95:1, 95:3, 95:7, 99:21, 138:15,</p>
---	---	--	---	---

<p>156:16, 160:20, 185:18, 185:19</p> <p>answered [1] - 21:18</p> <p>answers [4] - 85:8, 91:15, 93:21, 163:6</p> <p>ANTHONY [1] - 3:10</p> <p>anticipate [1] - 85:13</p> <p>ANTRIM [1] - 4:17</p> <p>anxious [10] - 15:13, 15:21, 16:2, 16:19, 82:15, 91:14, 119:24, 120:15, 152:2, 167:14</p> <p>anyway [2] - 99:21, 180:20</p> <p>apart [2] - 56:16, 108:19</p> <p>apologise [1] - 137:22</p> <p>apology [9] - 136:17, 138:8, 140:15, 140:16, 141:8, 141:22, 188:18, 194:21</p> <p>appalled [2] - 43:11, 43:15</p> <p>appear [14] - 11:3, 31:5, 32:5, 41:11, 82:29, 87:13, 116:12, 126:18, 133:11, 150:2, 175:21, 181:1, 181:5, 187:15</p> <p>APPEARANCES [1] - 2:1</p> <p>appeared [5] - 96:12, 96:13, 102:20, 131:1, 150:26</p> <p>appearing [1] - 184:26</p> <p>applied [3] - 102:4, 104:3, 104:5</p> <p>applies [1] - 63:5</p> <p>apply [5] - 61:2, 63:16, 104:13, 104:28, 105:7</p> <p>appoint [1] - 101:17</p> <p>appointed [2] - 100:10, 100:24</p> <p>appointment [1] - 148:24</p> <p>appreciate [5] - 24:9, 44:20, 47:17, 115:9, 136:29</p> <p>appreciated [1] - 138:17</p> <p>appreciating [1] - 157:25</p> <p>approach [2] - 124:19, 193:14</p> <p>approached [2] - 30:10, 193:11</p>	<p>appropriate [1] - 137:22</p> <p>appropriately [2] - 119:1, 119:4</p> <p>approximate [2] - 12:27, 47:3</p> <p>April [10] - 73:12, 79:28, 120:9, 130:1, 168:27, 168:28, 170:1, 171:8, 191:15, 191:27</p> <p>area [4] - 49:21, 145:13, 178:8, 182:4</p> <p>areas [3] - 164:21, 180:6, 187:17</p> <p>arena [2] - 78:18, 108:14</p> <p>arise [1] - 126:17</p> <p>arisen [7] - 121:15, 122:20, 127:8, 130:17, 140:29, 144:15, 184:1</p> <p>arises [1] - 174:27</p> <p>arising [14] - 6:29, 13:28, 65:8, 69:22, 120:12, 122:5, 122:20, 122:28, 131:29, 132:3, 151:3, 178:21, 183:2</p> <p>arms [1] - 114:26</p> <p>arose [7] - 126:5, 127:10, 134:26, 140:16, 147:20, 168:18, 186:25</p> <p>ARRAN [3] - 2:12, 4:11, 4:11</p> <p>arrange [3] - 69:18, 192:20, 193:1</p> <p>arranged [7] - 54:14, 68:6, 118:4, 125:24, 125:28, 132:2, 151:29</p> <p>arrangement [1] - 143:11</p> <p>arranging [1] - 150:11</p> <p>arrest [9] - 6:23, 7:6, 7:14, 7:16, 7:17, 8:3, 8:10, 8:12, 14:22</p> <p>arrested [7] - 7:21, 7:24, 10:25, 10:26, 12:3, 14:18, 92:28</p> <p>arrived [3] - 59:28, 171:23, 181:2</p> <p>article [16] - 59:7, 79:13, 79:17, 79:24, 80:2, 81:23, 81:25, 82:2, 82:7, 82:14, 82:18, 83:8, 83:29, 84:7, 91:11, 178:13</p> <p>articles [11] - 82:20,</p>	<p>83:10, 84:10, 150:26, 150:29, 151:1, 151:2, 155:4, 155:9, 178:20, 179:15</p> <p>AS [11] - 6:1, 6:5, 48:12, 50:6, 67:1, 70:2, 71:20, 107:6, 116:8, 116:19, 194:16</p> <p>ascertain [7] - 25:4, 137:13, 139:22, 142:1, 143:2, 195:9, 196:13</p> <p>aside [1] - 39:8</p> <p>aspects [2] - 62:24, 170:7</p> <p>assault [1] - 108:6</p> <p>asserting [2] - 94:17, 122:9</p> <p>assertion [1] - 63:19</p> <p>assertions [2] - 133:5, 134:1</p> <p>assessed [1] - 26:16</p> <p>assigned [1] - 24:24</p> <p>assist [1] - 110:2</p> <p>assistance [7] - 49:14, 49:18, 61:19, 111:28, 160:5, 174:19, 182:5</p> <p>assistant [6] - 69:8, 100:10, 122:14, 130:6, 191:29</p> <p>Assistant [41] - 32:20, 68:7, 68:27, 69:4, 86:2, 119:18, 125:5, 133:3, 138:21, 138:25, 139:9, 139:17, 140:10, 141:29, 167:13, 168:13, 168:29, 169:15, 169:24, 170:21, 171:8, 171:9, 173:23, 174:1, 174:8, 174:12, 175:19, 175:20, 176:15, 188:20, 188:27, 189:3, 190:22, 191:17, 193:27, 194:2, 194:19, 194:21, 195:1, 195:14, 195:17</p> <p>ASSOCIATED [1] - 3:15</p> <p>associated [1] - 179:9</p> <p>association [1] - 88:4</p> <p>assume [1] - 171:9</p> <p>assumed [2] - 176:12, 178:20</p> <p>assurance [1] -</p>	<p>123:3</p> <p>asthma [1] - 185:8</p> <p>AT [1] - 197:7</p> <p>attached [3] - 102:24, 102:26, 171:25</p> <p>attachments [1] - 105:17</p> <p>attack [1] - 43:3</p> <p>attempt [4] - 48:27, 136:2, 172:8, 172:13</p> <p>attempted [1] - 42:20</p> <p>attempting [2] - 55:25, 66:10</p> <p>attend [1] - 97:23</p> <p>attended [6] - 59:2, 68:21, 84:22, 85:24, 139:4, 159:7</p> <p>attending [4] - 30:11, 50:12, 85:28, 152:27</p> <p>attention [10] - 26:26, 37:19, 38:25, 50:21, 50:26, 57:12, 57:20, 133:6, 166:8, 170:9</p> <p>attitude [6] - 12:13, 54:5, 54:17, 54:24, 190:17, 190:20</p> <p>Attorney [2] - 162:1, 164:9</p> <p>attributed [1] - 152:23</p> <p>Auditor [1] - 161:26</p> <p>August [9] - 25:23, 26:7, 26:8, 52:10, 100:14, 101:3</p> <p>AUGUSTUS [1] - 2:28</p> <p>author [2] - 172:1, 192:6</p> <p>authorities [5] - 123:3, 124:20, 167:11, 169:11, 175:29</p> <p>authority [4] - 83:11, 83:15, 83:23, 104:24</p> <p>authors [2] - 189:17, 189:23</p> <p>automatically [1] - 179:8</p> <p>autumn [1] - 133:20</p> <p>available [3] - 72:26, 73:21, 181:20</p> <p>avenues [2] - 46:3, 46:4</p> <p>await [1] - 122:21</p> <p>aware [42] - 14:21, 14:24, 14:28, 15:4, 15:7, 15:15, 28:23, 28:24, 29:6, 32:11,</p>	<p>40:23, 43:12, 45:15, 45:22, 53:24, 53:28, 54:20, 55:13, 63:14, 70:3, 70:8, 70:9, 132:28, 133:1, 135:17, 148:15, 149:6, 149:20, 149:23, 151:1, 151:2, 151:15, 153:8, 153:9, 169:7, 185:2, 189:14, 190:6, 192:5, 192:8, 193:5</p>
B				
<p>background [10] - 44:3, 138:14, 142:11, 142:19, 142:24, 144:9, 147:4, 167:17, 185:1, 185:17</p> <p>bad [4] - 36:16, 36:20, 36:23, 37:12</p> <p>badly [2] - 7:13, 152:22</p> <p>Bailieboro [3] - 117:18, 183:13, 183:15</p> <p>balance [1] - 9:1</p> <p>Ballymun [1] - 100:20</p> <p>Bandon [5] - 43:27, 44:14, 56:13, 103:9, 103:15</p> <p>Barnes [2] - 66:9, 71:24</p> <p>barracks [3] - 35:1, 35:13, 35:24</p> <p>Barrington [2] - 116:12, 194:10</p> <p>BARRINGTON [4] - 4:19, 116:11, 187:8, 194:12</p> <p>barrister [1] - 15:9</p> <p>barristers [1] - 159:3</p> <p>based [6] - 64:13, 146:22, 168:12, 182:7, 194:28, 195:1</p> <p>basis [17] - 47:16, 61:14, 64:10, 79:27, 127:19, 127:26, 128:2, 140:22, 144:19, 145:26, 149:4, 184:7, 184:17, 184:18, 184:20, 195:12</p> <p>battle [1] - 145:21</p> <p>bear [6] - 54:11, 80:17, 84:17, 84:18, 156:26, 158:27</p>				

<p>became [6] - 76:17, 102:24, 130:6, 140:8, 187:23, 192:5</p> <p>become [3] - 39:29, 42:7, 110:29</p> <p>BEEN [1] - 116:18</p> <p>beg [5] - 8:18, 39:12, 45:9, 158:8, 175:2</p> <p>began [2] - 51:27, 52:1</p> <p>begin [1] - 136:24</p> <p>beginning [4] - 79:28, 121:7, 126:26, 132:26</p> <p>begins [1] - 81:16</p> <p>behalf [10] - 17:22, 17:27, 57:15, 60:29, 112:3, 116:13, 157:8, 184:27, 187:16, 194:19</p> <p>behaved [1] - 152:22</p> <p>behest [1] - 61:18</p> <p>behind [8] - 32:29, 33:9, 33:17, 34:16, 140:19, 141:22, 149:22, 152:18</p> <p>BELFAST [1] - 4:16</p> <p>belief [3] - 24:7, 38:16, 121:27</p> <p>believes [2] - 17:28, 76:6</p> <p>beneficiaries [1] - 121:19</p> <p>benefit [1] - 28:4</p> <p>Berry [6] - 49:15, 50:1, 59:28, 59:29, 66:20, 66:25</p> <p>BERRY [8] - 4:14, 5:7, 67:1, 67:2, 69:20, 70:23, 71:2, 71:17</p> <p>best [8] - 21:21, 22:3, 58:29, 63:4, 143:17, 154:10, 155:10, 186:17</p> <p>best' [1] - 12:15</p> <p>better [4] - 15:29, 42:15, 46:24, 137:14</p> <p>between [20] - 16:13, 19:27, 26:3, 27:19, 45:14, 63:22, 64:16, 71:4, 135:20, 144:1, 147:12, 148:2, 148:23, 149:28, 152:6, 169:18, 178:12, 178:16, 179:5</p> <p>beyond [1] - 147:5</p> <p>big [3] - 99:1, 103:3, 145:10</p> <p>bit [7] - 25:16, 49:23, 82:10, 99:29, 100:6,</p>	<p>120:20, 185:7</p> <p>bitter [6] - 111:1, 111:2, 113:4, 113:9, 113:10</p> <p>bitterness [2] - 107:20, 113:7</p> <p>BL [14] - 2:7, 2:10, 2:16, 2:16, 2:17, 2:23, 2:27, 2:28, 3:1, 3:5, 3:10, 4:10, 4:14, 4:19</p> <p>black [2] - 142:10, 165:7</p> <p>blacken [1] - 23:26</p> <p>blaming [1] - 8:11</p> <p>blessed [1] - 53:7</p> <p>bluntly [1] - 16:28</p> <p>body [1] - 46:29</p> <p>bones [1] - 46:11</p> <p>book [1] - 109:8</p> <p>booklet [1] - 166:1</p> <p>born [1] - 146:11</p> <p>boss [2] - 114:25, 115:6</p> <p>bosses [1] - 12:11</p> <p>bottom [6] - 50:25, 81:17, 84:18, 86:26, 92:17, 195:18</p> <p>bound [3] - 20:4, 63:3, 190:6</p> <p>BOW [1] - 2:29</p> <p>box [4] - 60:4, 64:13, 181:18, 181:23</p> <p>Brady [1] - 69:13</p> <p>breach [1] - 67:26</p> <p>breaching [1] - 65:24</p> <p>breaking [1] - 112:12</p> <p>BREFFNI [1] - 2:10</p> <p>BREFFNI [1] - 159:2</p> <p>Brett [5] - 125:12, 125:18, 125:23, 126:7, 126:12</p> <p>BRIAN [1] - 4:20</p> <p>brief [20] - 45:8, 45:10, 45:11, 45:24, 45:26, 72:8, 82:15, 85:27, 86:15, 86:24, 97:13, 97:15, 145:1, 146:15, 156:18, 157:6, 178:22, 185:19, 186:5, 187:12</p> <p>briefed [7] - 73:9, 73:11, 73:20, 98:24, 99:12, 103:9, 114:20</p> <p>briefing [4] - 10:1, 48:28, 85:2, 109:3</p> <p>briefly [1] - 187:17</p> <p>briefs [1] - 180:4</p> <p>bring [14] - 8:13, 25:16, 31:11, 48:18, 74:10, 75:11, 128:29,</p>	<p>136:15, 138:16, 142:5, 156:13, 163:7, 166:7, 170:21</p> <p>bringing [2] - 6:9, 108:13</p> <p>broad [1] - 176:11</p> <p>broadly [3] - 46:26, 70:8, 117:3</p> <p>BRODERICK [1] - 3:28</p> <p>broke [2] - 6:8, 37:27</p> <p>brought [15] - 18:25, 20:1, 50:21, 68:24, 69:12, 70:26, 113:25, 114:21, 115:17, 120:28, 123:13, 133:6, 164:3, 166:23, 179:28</p> <p>brouhaha [1] - 186:25</p> <p>bugging [1] - 182:28</p> <p>buildings [1] - 149:10</p> <p>burglaries [1] - 97:4</p> <p>burgled [1] - 96:11</p> <p>BURNS [24] - 2:22, 5:6, 5:15, 49:27, 50:1, 50:6, 50:8, 55:20, 55:25, 55:29, 56:3, 56:5, 57:2, 57:10, 58:15, 58:17, 59:9, 59:19, 59:21, 59:27, 184:24, 184:25, 187:3, 187:5</p> <p>burns [4] - 55:22, 56:27, 58:27, 184:26</p> <p>business [2] - 183:10, 188:24</p> <p>BY [38] - 1:5, 1:8, 2:11, 2:17, 2:23, 2:28, 3:2, 3:6, 3:17, 4:7, 4:10, 4:14, 4:20, 5:4, 5:5, 5:6, 5:7, 5:8, 5:9, 5:10, 5:13, 5:14, 5:15, 5:16, 5:17, 6:4, 48:12, 50:6, 67:1, 70:1, 71:20, 107:5, 116:19, 159:1, 184:24, 187:14, 194:16</p> <p>bypassing [1] - 114:13</p>	<p>12:17, 12:19, 27:26, 27:28, 29:4, 30:10, 30:11, 30:23, 30:27, 31:18, 31:26, 32:10, 32:16, 32:25, 33:20, 34:5, 34:27, 35:4, 35:12, 36:4, 36:8, 36:19, 36:23, 40:26, 43:3, 43:14, 44:25, 45:2, 45:7, 45:15, 45:27, 46:19, 46:22, 47:4, 49:10, 50:16, 51:1, 51:20, 51:23, 52:3, 55:11, 56:9, 56:16, 56:22, 57:4, 67:6, 69:6, 70:5, 70:12, 70:17, 71:9, 78:6, 97:21, 97:29, 101:21, 101:28, 102:7, 102:24, 107:12, 107:17, 108:26, 115:27, 118:22, 139:4, 142:17, 145:9, 145:29, 150:1, 150:9, 163:9, 175:21, 184:9, 184:29, 185:4, 185:24, 185:25</p> <p>Callinan's [10] - 6:10, 6:15, 9:11, 9:12, 9:25, 37:6, 43:21, 46:8, 46:16, 69:11</p> <p>calm [1] - 106:8</p> <p>campaign [19] - 18:7, 19:18, 20:3, 20:7, 20:24, 21:12, 21:21, 21:29, 22:1, 22:2, 22:17, 25:9, 41:25, 43:9, 51:22, 55:4, 71:14, 103:13, 103:14</p> <p>cancellation [1] - 124:5</p> <p>cancelled [2] - 127:25, 170:16</p> <p>capacity [1] - 82:25</p> <p>car [2] - 39:16, 149:27</p> <p>care [1] - 167:21</p> <p>careful [4] - 14:6, 14:8, 119:6, 173:10</p> <p>carefully [1] - 115:10</p> <p>carried [3] - 49:9, 165:15, 170:20</p> <p>carry [4] - 55:23, 55:27, 148:24, 158:26</p> <p>CARTHAGE [1] - 2:23</p> <p>case [26] - 14:13, 18:19, 18:23, 20:4,</p>	<p>22:19, 22:26, 31:16, 46:5, 59:21, 63:15, 70:5, 70:13, 74:8, 96:24, 114:6, 119:14, 119:26, 126:9, 129:5, 163:17, 167:25, 167:28, 168:2, 169:6, 169:10, 187:26</p> <p>cases [8] - 97:3, 113:25, 133:6, 145:14, 145:18, 145:20, 164:12, 191:1</p> <p>CASTLE [1] - 1:17</p> <p>categories [1] - 117:12</p> <p>CATHAL [1] - 4:19</p> <p>Cathal [1] - 116:12</p> <p>cathartic [2] - 22:19, 40:14</p> <p>caught [1] - 41:13</p> <p>caused [6] - 15:27, 16:1, 38:20, 137:24, 153:1, 183:20</p> <p>causing [3] - 70:7, 140:12, 140:13</p> <p>caution [1] - 167:21</p> <p>Cavan [3] - 117:4, 118:25, 189:14</p> <p>Cavan-Monaghan [1] - 117:4</p> <p>Cavan/Monaghan [1] - 178:8</p> <p>ceased [4] - 149:16, 151:23, 153:8, 181:21</p> <p>celebration [1] - 147:26</p> <p>central [1] - 85:17</p> <p>centrally [1] - 61:15</p> <p>centre [4] - 38:25, 39:4, 84:27, 112:13</p> <p>CERTAIN [1] - 1:4</p> <p>certain [12] - 60:13, 68:13, 86:20, 93:23, 110:1, 110:3, 143:26, 144:16, 157:5, 176:3, 186:24</p> <p>certainly [25] - 11:4, 14:10, 15:9, 26:10, 29:22, 36:13, 44:8, 46:23, 62:28, 64:9, 99:19, 108:16, 125:22, 134:28, 149:19, 149:20, 149:23, 157:5, 158:25, 163:4, 166:16, 179:2, 182:12, 191:1, 194:27</p> <p>certainty [2] - 97:26, 153:20</p> <p>certify [1] - 1:25</p>
C				
<p>C&AG's [2] - 164:22, 164:27</p> <p>Callinan [84] - 7:20, 7:26, 8:19, 8:23, 9:14, 10:5, 10:27, 11:13,</p>				

<p>CHAIRMAN^[164] - 5:10, 9:27, 10:4, 10:9, 20:10, 20:13, 20:15, 20:17, 20:20, 20:28, 21:1, 29:19, 29:23, 37:17, 37:21, 44:13, 44:17, 48:2, 48:8, 49:12, 49:19, 49:24, 49:29, 50:4, 55:16, 55:22, 55:27, 56:1, 56:4, 56:27, 57:8, 57:27, 58:16, 58:27, 59:17, 59:20, 59:22, 59:29, 60:10, 60:15, 60:17, 60:23, 60:27, 61:2, 61:8, 61:14, 62:2, 62:12, 62:15, 62:19, 63:3, 63:7, 63:14, 63:24, 63:28, 64:12, 65:9, 65:29, 66:4, 66:12, 66:15, 66:18, 66:21, 69:25, 70:27, 71:3, 71:18, 81:10, 81:29, 96:9, 96:19, 96:24, 96:27, 96:29, 99:15, 99:19, 99:23, 106:8, 107:5, 107:7, 107:16, 107:23, 107:26, 107:28, 108:5, 108:9, 108:15, 108:19, 108:22, 109:4, 109:7, 109:16, 109:18, 109:20, 109:22, 109:24, 109:26, 109:28, 110:4, 110:6, 110:11, 110:13, 110:16, 110:21, 110:26, 110:29, 111:5, 111:9, 111:14, 111:21, 111:25, 111:27, 112:6, 112:12, 112:15, 112:17, 112:21, 112:27, 113:2, 113:7, 113:16, 113:20, 113:22, 114:1, 114:6, 114:11, 114:27, 114:29, 115:7, 115:17, 115:23, 116:1, 116:15, 119:13, 156:18, 157:22, 158:3, 158:6, 158:10, 158:16, 158:19, 158:21, 158:24, 158:26, 160:8, 162:26, 167:27, 168:3, 172:15, 172:19, 174:21, 174:23, 180:14, 184:22,</p>	<p>186:27, 187:1, 187:7, 187:10, 190:28, 191:6, 194:10, 194:14, 197:1, 197:3 Chairman^[52] - 20:27, 29:29, 30:9, 38:17, 38:28, 41:27, 44:22, 48:5, 49:11, 49:14, 49:22, 49:27, 55:14, 55:20, 55:29, 56:3, 56:26, 57:2, 57:11, 58:17, 59:15, 59:28, 60:20, 61:7, 61:10, 61:22, 63:21, 66:8, 67:2, 69:23, 70:23, 71:17, 96:28, 99:17, 111:2, 111:26, 112:11, 116:11, 141:1, 150:12, 157:7, 157:9, 157:26, 158:28, 163:24, 163:27, 166:17, 180:22, 184:25, 187:9, 187:12, 194:12 chairman^[1] - 60:1 Chairman's^[1] - 19:25 challenged^[1] - 79:7 chamber^[1] - 149:10 CHAMBERS^[1] - 2:24 chance^[1] - 43:24 change^[3] - 114:16, 157:9, 196:24 changed^[1] - 54:27 changes^[4] - 127:1, 128:12, 138:6, 165:20 chapter^[1] - 128:29 character^[1] - 48:29 charge^[35] - 15:13, 15:22, 16:3, 16:19, 68:27, 69:4, 69:9, 69:10, 70:13, 106:29, 117:15, 118:2, 118:13, 124:6, 124:7, 126:21, 127:14, 128:7, 131:4, 133:22, 135:7, 138:1, 141:6, 143:7, 143:18, 145:3, 147:29, 148:21, 164:17, 165:23, 168:27, 192:4, 196:9, 196:12, 196:24 charges^[12] - 17:2, 17:3, 17:7, 17:9, 75:17, 75:21, 75:25, 121:20, 121:28, 127:25, 127:29, 134:12 CHARLETON^[2] -</p>	<p>1:12, 2:2 chart^[3] - 81:10, 91:2, 91:4 check^[3] - 23:21, 23:25, 80:16 Chief^[15] - 64:15, 100:9, 101:7, 112:6, 113:26, 120:16, 121:11, 122:22, 122:25, 130:8, 131:6, 138:21, 171:21, 171:26, 192:12 CHIEF^[1] - 2:18 chief^[1] - 130:7 child^[4] - 38:16, 38:29, 145:5, 182:3 children^[8] - 14:4, 14:12, 14:20, 30:13, 75:24, 96:20, 112:4, 145:17 children..^[1] - 75:16 chose^[2] - 100:18, 128:23 chucked^[1] - 44:17 circle^[6] - 97:18, 98:8, 98:15, 98:29, 99:1, 99:11 circular^[1] - 85:1 circulate^[1] - 85:27 circulated^[8] - 28:26, 48:17, 86:20, 87:11, 87:23, 95:28, 120:24, 158:13 circumstances^[18] - 7:10, 8:2, 14:25, 63:15, 101:18, 121:28, 129:19, 129:21, 133:6, 136:9, 136:10, 136:11, 139:24, 140:6, 143:10, 151:24, 190:11, 190:26 citizen^[1] - 63:5 citizens^[1] - 133:11 civilian^[2] - 35:14, 114:25 civilians^[1] - 35:19 claim^[9] - 20:2, 24:10, 24:13, 27:26, 38:1, 38:14, 64:20, 65:15, 70:18 claimed^[1] - 129:21 claims^[3] - 127:23, 137:17, 170:18 Clare^[1] - 76:26 clarification^[4] - 24:2, 57:10, 57:26, 95:2 clarify^[2] - 22:25, 94:10</p>	<p>clarity^[3] - 14:9, 17:23, 24:23 class^[1] - 22:19 clean^[2] - 17:4, 104:22 clear^[26] - 8:10, 12:19, 12:22, 13:9, 13:26, 16:29, 22:16, 23:22, 25:7, 40:27, 71:24, 76:10, 76:11, 93:7, 94:11, 94:12, 96:29, 99:21, 102:23, 122:1, 134:15, 139:8, 140:8, 172:24, 175:10, 180:17 clearcut^[1] - 45:28 cleared^[1] - 181:22 clearly^[18] - 7:28, 30:1, 76:5, 94:25, 109:7, 111:7, 128:16, 129:11, 137:10, 165:10, 168:1, 168:11, 168:14, 176:9, 176:14, 176:15, 181:9 Clerkin^[23] - 64:16, 75:15, 75:23, 88:10, 92:3, 93:13, 94:4, 94:12, 94:21, 94:25, 94:26, 95:5, 95:10, 95:13, 95:22, 96:19, 100:9, 101:7, 111:10, 111:19, 111:21, 112:6, 113:26 Clerkin"^[1] - 88:14 client^[13] - 59:3, 63:20, 64:14, 64:17, 65:12, 65:16, 65:20, 65:21, 72:5, 72:12, 72:14, 72:16, 74:14 client's^[5] - 17:24, 23:2, 44:20, 59:1, 64:19 clients^[4] - 61:26, 62:25, 63:9, 64:10 clients'^[1] - 62:7 CLIFFORD^[1] - 3:28 Clifford^[21] - 17:23, 17:27, 18:7, 18:17, 19:8, 19:15, 19:23, 20:5, 20:20, 21:7, 22:2, 22:16, 22:29, 23:6, 23:28, 24:13, 24:16, 25:18, 41:18, 77:22, 106:11 Clifford's^[3] - 17:21, 23:17, 25:27 clippings^[4] - 79:25, 80:3, 82:25, 84:4 close^[8] - 8:20,</p>	<p>30:19, 30:21, 33:1, 33:2, 33:12, 33:22, 114:7 closest^[2] - 8:17 closing^[1] - 42:2 co^[6] - 170:14, 170:19, 171:15, 172:9, 172:10, 172:25 co-operate^[4] - 170:14, 170:19, 171:15, 172:25 co-operation^[2] - 172:9, 172:10 code^[3] - 67:27, 112:13, 112:24 coffee^[2] - 147:23, 148:17 cognisant^[1] - 190:1 cohort^[1] - 97:24 coincided^[1] - 121:20 collating^[1] - 109:28 colleague^[7] - 8:17, 68:24, 69:13, 69:15, 146:9 colleagues^[10] - 8:20, 38:7, 39:8, 106:29, 125:24, 148:19, 149:12, 149:13 collect^[1] - 11:8 college^[2] - 147:27, 152:27 colourful^[1] - 33:29 comfort^[2] - 53:6, 53:8 coming^[11] - 54:17, 84:14, 84:16, 85:15, 86:5, 133:26, 148:28, 149:9, 154:22, 159:10, 159:23 command^[1] - 44:9 commenced^[2] - 51:24, 100:14 commencing^[1] - 101:3 comment^[11] - 17:15, 37:13, 37:26, 129:12, 130:21, 132:11, 153:19, 156:18, 162:7, 173:4, 182:12 comments^[2] - 37:14, 188:8 commission^[17] - 119:6, 123:25, 125:1, 142:24, 143:3, 143:24, 145:7, 150:8, 153:10, 154:4, 155:28, 158:11,</p>
---	---	---	---	--

<p>159:16, 183:11, 183:12, 183:19, 183:27</p> <p>Commission [3] - 141:7, 172:26, 195:16</p> <p>Commissioner [188] - 6:29, 8:12, 8:19, 9:11, 9:19, 9:21, 10:5, 10:12, 10:16, 10:20, 10:27, 12:17, 16:24, 27:28, 29:4, 30:23, 31:18, 31:26, 32:4, 32:14, 32:20, 32:25, 33:6, 33:10, 34:5, 34:26, 35:4, 36:4, 36:7, 36:19, 36:23, 38:28, 43:14, 43:15, 45:1, 45:7, 45:15, 45:23, 45:27, 46:8, 46:16, 46:19, 46:22, 46:28, 49:10, 51:1, 55:5, 56:9, 56:16, 67:6, 67:9, 67:29, 68:7, 68:18, 68:20, 68:23, 68:26, 68:27, 69:4, 69:6, 69:9, 69:11, 70:5, 71:9, 72:7, 76:7, 76:14, 83:16, 83:18, 83:19, 83:21, 84:29, 85:21, 86:2, 97:21, 97:28, 98:4, 99:25, 100:24, 100:27, 101:21, 101:28, 102:7, 102:24, 103:16, 104:27, 104:29, 106:1, 106:21, 107:16, 108:26, 113:19, 114:13, 118:21, 118:22, 119:19, 119:22, 120:5, 120:7, 124:12, 125:5, 129:27, 130:27, 131:1, 131:3, 132:2, 133:3, 133:27, 135:22, 138:22, 138:26, 139:3, 139:9, 139:17, 140:10, 141:29, 142:1, 142:4, 142:17, 143:1, 143:19, 144:1, 144:5, 147:18, 147:21, 148:11, 150:1, 150:11, 151:3, 157:13, 157:29, 158:9, 158:17, 162:10, 163:9, 167:14, 167:19, 168:13, 168:29, 169:15, 169:19, 169:22, 169:25,</p>	<p>170:13, 170:19, 170:21, 171:3, 171:8, 171:9, 171:15, 172:25, 173:5, 173:12, 173:23, 174:1, 174:8, 174:13, 175:19, 175:20, 176:15, 176:16, 178:18, 178:23, 179:7, 184:29, 186:19, 188:21, 188:28, 189:4, 189:20, 190:12, 190:22, 191:17, 192:10, 193:19, 193:27, 194:2, 194:19, 194:22, 195:2, 195:8, 195:15, 195:17, 195:21</p> <p>commissioner [6] - 100:11, 119:28, 130:6, 139:29, 158:5, 158:11</p> <p>COMMISSIONER [1] - 2:14</p> <p>Commissioner's [12] - 32:2, 33:4, 45:22, 83:17, 86:12, 86:15, 100:2, 105:26, 171:4, 171:6, 172:3, 192:16</p> <p>Commissioners [5] - 51:14, 51:19, 78:15, 78:19, 82:16</p> <p>commissions [1] - 158:15</p> <p>commitments [1] - 9:6</p> <p>Committee [6] - 132:15, 132:22, 140:29, 148:6, 150:12, 166:27</p> <p>committee [5] - 30:10, 30:11, 38:17, 139:2, 168:26</p> <p>common [2] - 17:17, 131:17</p> <p>communicated [2] - 92:1, 118:14</p> <p>communication [4] - 68:16, 193:24, 193:25, 194:1</p> <p>Communications [1] - 107:13</p> <p>communications [5] - 26:29, 71:4, 93:27, 94:2, 94:4</p> <p>community [1] - 35:6</p> <p>company [3] - 36:29, 39:11, 39:13</p> <p>COMPANY [2] - 2:11,</p>	<p>4:2</p> <p>compared [1] - 38:27</p> <p>compass [1] - 12:6</p> <p>compelled [1] - 123:8</p> <p>complain [1] - 168:29</p> <p>complainant [13] - 138:23, 138:27, 139:12, 139:22, 139:26, 140:1, 140:11, 141:12, 146:7, 168:16, 169:3, 176:14, 195:10</p> <p>Complainant [1] - 169:4</p> <p>complained [1] - 91:24</p> <p>complaining [4] - 16:2, 129:22, 130:4, 176:1</p> <p>complaint [5] - 143:9, 152:23, 179:16, 179:19, 183:16</p> <p>complaints [7] - 128:15, 134:2, 173:9, 175:17, 188:22, 192:3, 196:8</p> <p>complete [6] - 15:6, 30:28, 40:13, 72:27, 73:22, 195:17</p> <p>completed [4] - 136:1, 171:11, 172:7, 172:12</p> <p>completely [2] - 29:20, 156:23</p> <p>completing [1] - 192:28</p> <p>complex [1] - 185:13</p> <p>complexity [2] - 196:6, 196:7</p> <p>complicated [2] - 142:11, 142:12</p> <p>comply [4] - 131:10, 171:2, 171:4, 171:5</p> <p>comprehensive [2] - 195:25, 195:27</p> <p>compromised [2] - 112:23, 113:24</p> <p>Comptroller [3] - 161:25, 161:29, 164:9</p> <p>computer [3] - 20:22, 128:20, 175:11</p> <p>concentrated [1] - 37:23</p> <p>concentrates [1] - 37:21</p> <p>concentrating [1] - 35:9</p>	<p>concern [9] - 16:6, 85:21, 100:1, 100:4, 131:3, 144:10, 175:12, 188:13, 196:9</p> <p>concerned [22] - 7:10, 7:28, 38:5, 38:9, 63:10, 104:26, 108:29, 109:13, 118:20, 122:12, 122:25, 132:28, 147:7, 153:14, 153:15, 168:23, 176:10, 176:12, 176:18, 178:21, 183:5, 192:24</p> <p>concerning [12] - 10:15, 15:3, 29:3, 30:4, 40:25, 41:2, 43:21, 43:27, 56:12, 67:20, 76:11, 89:5</p> <p>concerns [16] - 118:1, 118:14, 120:12, 121:23, 121:25, 123:1, 127:27, 128:7, 133:9, 134:22, 141:3, 146:20, 155:10, 170:22, 180:3, 192:11</p> <p>conclude [3] - 43:20, 53:4, 130:20</p> <p>concluded [3] - 53:6, 58:4, 191:19</p> <p>conclusion [1] - 30:8</p> <p>conclusions [3] - 119:7, 122:21, 130:23</p> <p>condemned [1] - 151:26</p> <p>conduct [2] - 101:4, 183:7</p> <p>conducted [4] - 101:11, 122:22, 153:6, 182:7</p> <p>conducting [5] - 100:29, 119:6, 135:29, 139:20, 172:6</p> <p>conference [2] - 75:3, 148:3</p> <p>conferences [3] - 75:9, 147:21, 147:24</p> <p>confess [2] - 55:4, 151:27</p> <p>confessed [1] - 25:8</p> <p>confided [1] - 25:9</p> <p>confidence [1] - 142:28</p> <p>confidential [14] - 117:21, 123:5, 124:21, 133:10, 175:12, 189:26, 189:27, 190:8, 190:9,</p>	<p>190:14, 190:19, 194:23, 195:20, 195:25</p> <p>Confidential [1] - 190:3</p> <p>confidentiality [4] - 123:9, 144:8, 167:5, 190:21</p> <p>confirm [9] - 24:12, 49:1, 70:16, 116:24, 123:16, 124:25, 124:26, 160:23, 176:5</p> <p>confirmation [2] - 24:15, 90:15</p> <p>confirmed [9] - 14:1, 15:11, 16:12, 23:28, 24:28, 74:1, 90:28, 130:26, 164:23</p> <p>confirming [1] - 71:25</p> <p>confiscated [1] - 34:29</p> <p>conflict [4] - 16:7, 101:1, 106:5</p> <p>confront [2] - 54:12, 76:18</p> <p>confronted [1] - 73:29</p> <p>congratulate [1] - 83:8</p> <p>CONLON [1] - 2:23</p> <p>connect [1] - 70:11</p> <p>connected [3] - 70:5, 98:11, 178:13</p> <p>connecting [1] - 189:19</p> <p>connection [7] - 19:9, 94:13, 146:7, 150:26, 178:12, 178:16, 179:5</p> <p>connections [1] - 105:17</p> <p>Connolly [2] - 117:21, 117:25</p> <p>Conor [4] - 48:6, 48:15, 49:8, 187:15</p> <p>CONOR [3] - 2:15, 3:17, 4:2</p> <p>conscious [10] - 122:25, 129:7, 134:18, 140:12, 142:22, 154:1, 155:8, 167:16, 167:17, 188:15</p> <p>consequence [7] - 107:19, 108:23, 115:18, 127:25, 131:12, 134:11, 143:28</p> <p>consider [4] - 101:1,</p>
---	--	--	---	--

<p>115:10, 139:27, 154:28</p> <p>considerable [2] - 31:2, 65:2</p> <p>consideration [1] - 154:21</p> <p>considered [4] - 67:26, 137:3, 137:11, 139:21</p> <p>considering [2] - 196:5, 196:19</p> <p>consistent [1] - 62:8</p> <p>consistently [2] - 59:17, 134:26</p> <p>constant [2] - 46:25, 188:15</p> <p>constantly [3] - 96:25, 142:10, 148:19</p> <p>constituency [4] - 180:1, 180:11, 180:13, 180:18</p> <p>constituent [2] - 178:3, 178:9</p> <p>constituents [1] - 155:12</p> <p>constrained [1] - 48:20</p> <p>constraints [2] - 61:27, 65:22</p> <p>constructively [1] - 138:18</p> <p>consulting [1] - 119:10</p> <p>contact [26] - 12:10, 51:4, 53:11, 54:3, 56:6, 56:8, 56:14, 57:5, 66:10, 67:5, 67:24, 74:7, 105:13, 130:2, 130:5, 130:7, 130:9, 136:9, 171:7, 172:13, 189:25, 192:11, 192:13, 192:29, 193:3, 195:20</p> <p>contacted [10] - 50:29, 52:13, 58:7, 135:29, 172:6, 177:28, 178:26, 191:13, 191:26, 195:21</p> <p>contacting [3] - 179:1, 192:14, 192:17</p> <p>contacts [5] - 27:19, 56:21, 64:16, 81:13, 142:16</p> <p>contain [1] - 132:8</p> <p>contained [3] - 47:15, 70:25, 174:17</p> <p>containing [1] - 133:9</p> <p>contemporaneous</p>	<p>[1] - 177:11</p> <p>contend [1] - 94:6</p> <p>content [2] - 58:2, 174:4</p> <p>contention [3] - 24:24, 25:8, 29:8</p> <p>contentious [1] - 27:25</p> <p>contents [2] - 45:3, 87:13</p> <p>Contest [1] - 59:24</p> <p>contesting [1] - 93:26</p> <p>context [28] - 44:28, 72:21, 77:25, 88:10, 101:22, 106:6, 106:27, 120:13, 121:13, 127:7, 127:10, 128:4, 128:8, 128:15, 131:3, 138:22, 139:14, 141:8, 142:9, 144:14, 145:17, 166:8, 166:14, 173:16, 180:4, 185:5, 185:9, 186:21</p> <p>contexts [1] - 126:17</p> <p>continue [3] - 105:20, 124:21, 188:4</p> <p>continued [7] - 120:2, 133:19, 134:1, 135:5, 176:20, 176:22, 188:2</p> <p>continues [1] - 124:6</p> <p>continuing [6] - 129:15, 130:21, 134:23, 140:12, 143:14, 144:4</p> <p>continuous [1] - 95:27</p> <p>contradict [2] - 24:20, 125:23</p> <p>contradicting [1] - 64:22</p> <p>contrary [5] - 18:5, 46:12, 46:18, 145:8, 157:4</p> <p>contributed [2] - 163:13, 183:6</p> <p>contribution [1] - 165:11</p> <p>control [1] - 124:13</p> <p>controversy [11] - 38:14, 138:10, 138:16, 139:14, 140:14, 143:14, 159:8, 161:1, 166:18, 175:27, 195:6</p> <p>Convention [1] - 63:13</p>	<p>conversation [40] - 31:22, 34:23, 35:9, 35:10, 35:25, 37:2, 37:15, 37:27, 44:25, 67:22, 126:6, 126:11, 130:13, 131:26, 143:26, 143:29, 144:29, 146:15, 146:16, 147:2, 147:17, 148:2, 148:11, 148:13, 150:28, 151:7, 151:16, 153:13, 155:20, 169:17, 169:22, 178:22, 184:28, 185:20, 186:12, 186:13, 186:18, 186:20, 193:4</p> <p>conversations [1] - 44:27</p> <p>convey [2] - 7:27, 68:2</p> <p>convinced [1] - 129:1</p> <p>cooke [2] - 154:23, 183:2</p> <p>cooperate [6] - 45:25, 45:26, 129:3, 136:27, 137:18, 171:4</p> <p>cooperated [2] - 129:24, 130:23</p> <p>cooperating [1] - 45:12</p> <p>cooperation [12] - 120:20, 125:12, 125:17, 126:4, 127:8, 133:14, 135:16, 136:3, 136:4, 136:18, 140:20, 187:20</p> <p>copies [1] - 166:28</p> <p>copy [12] - 44:1, 90:29, 120:29, 123:17, 157:15, 160:3, 171:27, 171:29, 174:17, 177:15, 177:17</p> <p>core [4] - 19:20, 20:2, 41:1, 45:25</p> <p>Cork [2] - 11:9, 11:10</p> <p>CORMAC [1] - 3:27</p> <p>correct [72] - 6:13, 6:24, 9:22, 12:26, 13:15, 15:23, 17:29, 28:15, 33:27, 40:8, 50:19, 50:20, 51:25, 51:26, 51:29, 52:7, 56:23, 58:23, 59:16, 66:3, 67:11, 68:29, 78:13, 79:22, 81:14, 81:15, 83:12, 84:22,</p>	<p>85:25, 88:24, 89:1, 89:6, 90:21, 91:3, 91:4, 91:7, 92:8, 92:25, 93:1, 93:15, 95:3, 95:9, 97:6, 97:7, 97:10, 99:27, 101:8, 101:20, 102:25, 105:19, 106:12, 113:20, 116:27, 117:11, 117:14, 118:27, 118:28, 119:19, 120:6, 121:4, 128:17, 129:14, 137:17, 140:4, 140:15, 141:25, 146:20, 155:13, 174:7, 174:29, 175:4, 177:4</p> <p>correcting [1] - 137:25</p> <p>correctly [4] - 20:25, 109:10, 113:12, 119:2</p> <p>corresponded [4] - 117:23, 117:25, 117:27, 122:16</p> <p>correspondence [18] - 63:22, 64:8, 65:5, 117:13, 117:16, 117:19, 118:3, 118:5, 118:6, 118:16, 118:21, 119:20, 119:24, 123:22, 123:27, 129:15, 133:19, 157:14</p> <p>correspondent [1] - 69:14</p> <p>corridor [2] - 39:15, 149:5</p> <p>corridors [1] - 148:19</p> <p>corruption [5] - 128:18, 141:2, 164:28, 190:3, 190:15</p> <p>corruptly [1] - 192:24</p> <p>COSTELLO [1] - 2:11</p> <p>could've [2] - 38:29, 68:22</p> <p>counsel [11] - 18:18, 19:8, 22:29, 23:18, 23:28, 24:27, 37:17, 37:24, 57:14, 60:29, 64:29</p> <p>counsel's [1] - 10:9</p> <p>counselled [1] - 150:13</p> <p>country [3] - 67:11, 180:3, 196:11</p> <p>COUNTY [1] - 4:17</p>	<p>couple [4] - 23:21, 48:22, 81:3, 89:8</p> <p>course [27] - 30:25, 31:17, 50:4, 50:14, 57:2, 67:22, 80:7, 91:25, 119:10, 124:20, 126:17, 127:15, 137:6, 137:12, 140:27, 145:18, 148:20, 156:5, 158:2, 158:28, 164:29, 173:13, 174:25, 177:9, 188:19, 189:12, 193:10</p> <p>COURT [2] - 1:13, 2:3</p> <p>court [3] - 114:21, 114:22, 167:18</p> <p>Court [2] - 62:13, 62:20</p> <p>Courts [1] - 191:9</p> <p>cover [1] - 187:16</p> <p>credibility [2] - 162:11, 163:10</p> <p>credit [5] - 24:10, 44:18, 46:13, 55:18, 55:19</p> <p>crime [2] - 69:13, 184:15</p> <p>criminal [10] - 18:19, 18:25, 19:27, 19:29, 42:5, 42:13, 49:3, 87:5, 105:25, 114:23</p> <p>criminality [1] - 164:27</p> <p>crisis [1] - 162:7</p> <p>criteria [1] - 190:13</p> <p>critical [2] - 6:29, 97:5</p> <p>criticising [1] - 93:19</p> <p>criticism [3] - 102:19, 139:17, 190:24</p> <p>CROSS [14] - 5:4, 5:5, 5:7, 5:8, 5:14, 5:15, 5:16, 6:4, 48:12, 67:1, 70:1, 159:1, 184:24, 187:14</p> <p>cross [4] - 29:1, 60:9, 66:22, 71:29</p> <p>cross-examine [2] - 60:9, 71:29</p> <p>CROSS-EXAMINED [14] - 5:4, 5:5, 5:7, 5:8, 5:14, 5:15, 5:16, 6:4, 48:12, 67:1, 70:1, 159:1, 184:24, 187:14</p> <p>cross-examined [1] - 29:1</p>
--	---	---	---	--

<p>CULLEN [1] - 2:28 culpability [1] - 113:29 CUNNINGHAM [1] - 3:22 cup [4] - 147:23, 147:24, 148:2, 148:17 Curran [1] - 171:22 current [1] - 124:11 curtail [1] - 145:22 custody [2] - 91:25, 145:17 cut [3] - 9:8, 99:19, 173:27</p>	<p>102:18, 102:19, 117:10, 145:10, 150:23, 157:22, 159:7, 167:21, 176:27, 181:9, 183:4, 184:1, 184:2, 195:16 dealing [19] - 36:10, 47:24, 85:16, 85:19, 87:8, 116:29, 118:10, 124:6, 131:7, 132:15, 141:4, 142:9, 142:20, 144:4, 146:24, 148:6, 175:17, 185:10, 195:27 dealings [3] - 52:9, 140:23, 176:20 dealt [27] - 39:3, 68:20, 104:21, 115:18, 118:26, 118:29, 119:3, 119:17, 134:13, 135:5, 139:18, 144:23, 145:14, 145:19, 146:17, 147:6, 147:28, 157:2, 165:7, 168:24, 179:29, 183:19, 183:24, 183:26, 184:2, 191:16, 196:4 debate [24] - 126:22, 126:27, 127:11, 127:12, 127:17, 128:5, 128:24, 131:18, 132:12, 136:26, 137:9, 154:22, 154:24, 154:29, 159:6, 159:9, 159:11, 159:16, 159:20, 161:18, 182:27, 183:1, 183:5, 183:8 debated [4] - 126:19, 126:26, 127:16, 183:3 debates [1] - 161:17 debating [1] - 162:23 DEBBIE [1] - 3:16 Debbie [5] - 50:11, 51:15, 61:8, 61:10, 61:15 December [26] - 101:12, 118:7, 118:8, 121:1, 121:7, 121:16, 122:6, 124:4, 124:27, 125:5, 135:1, 135:6, 135:23, 135:25, 142:7, 148:23, 161:10, 171:20, 172:17, 175:4, 175:9, 175:28, 192:10, 196:10, 196:27</p>	<p>decide [2] - 19:22, 98:7 decided [10] - 29:16, 42:15, 43:3, 62:29, 129:20, 145:26, 154:29, 155:9, 156:11, 183:17 decision [6] - 41:28, 44:15, 62:16, 103:16, 104:25, 120:13 decision-making [1] - 120:13 decisions [7] - 55:14, 55:16, 120:14, 131:15, 131:16, 164:20, 196:2 declared [1] - 45:28 declining [6] - 65:10, 65:13, 65:17, 65:26, 66:1, 71:29 Defence [1] - 132:20 defending [1] - 42:16 definitely [2] - 103:10, 113:15 definitive [2] - 62:19, 98:24 definitively [2] - 135:7, 157:2 degree [4] - 97:25, 106:2, 155:20, 193:23 degrees [2] - 113:7, 113:8 delay [1] - 130:17 delete [1] - 135:8 deleted [2] - 88:28, 135:4 deleting [2] - 128:18, 164:28 deletion [1] - 134:27 demand [1] - 77:25 demande [1] - 136:10 demonised [1] - 143:20 denied [2] - 89:9, 171:29 Denieffe [5] - 68:4, 68:11, 68:24, 69:12 denies [1] - 172:27 denigrate [2] - 38:15, 48:29 department [9] - 118:14, 122:15, 122:16, 125:13, 129:11, 130:4, 140:23, 142:28, 167:1 Department [10] - 56:12, 118:4, 118:15, 118:17, 144:2, 146:2, 166:29, 170:1, 170:2</p>	<p>department's [1] - 129:29 departmental [1] - 125:29 departments [2] - 85:2, 118:11 deputies [3] - 16:22, 160:21, 161:11 deputy [8] - 37:8, 37:13, 38:6, 75:19, 75:27, 77:15, 161:12, 162:22 Deputy [53] - 16:26, 16:27, 17:3, 27:8, 27:10, 27:19, 27:28, 28:16, 28:18, 29:1, 29:10, 30:3, 30:24, 31:8, 31:14, 32:14, 32:15, 32:19, 32:23, 32:24, 33:2, 33:9, 33:11, 33:15, 33:25, 33:27, 34:2, 36:4, 37:1, 37:4, 37:7, 39:27, 40:19, 41:17, 41:18, 68:26, 75:27, 75:29, 76:15, 77:12, 77:18, 101:23, 101:24, 106:14, 127:3, 150:1, 150:6, 160:15, 160:18, 161:28, 163:12 derive [1] - 175:24 derived [3] - 129:29, 139:6, 176:19 derogatory [8] - 76:8, 76:25, 76:27, 77:2, 78:3, 78:8, 78:14, 78:25 describe [4] - 84:21, 131:14, 185:5, 185:19 described [7] - 67:14, 68:11, 113:3, 113:9, 114:29, 143:12, 152:21 describes [1] - 162:2 description [6] - 130:19, 146:23, 150:4, 158:18, 186:10, 194:7 DESIGNATED [1] - 4:1 desk [3] - 46:23, 56:9, 56:10 despite [4] - 130:21, 133:4, 134:14, 134:18 destroyed [3] - 59:6, 115:14 destroying [1] - 115:26 destruction [1] -</p>	<p>20:11 detail [10] - 45:5, 64:7, 65:2, 72:15, 129:16, 134:14, 137:3, 155:21, 155:23 detailed [9] - 63:22, 65:7, 119:6, 122:19, 125:26, 127:26, 130:12, 138:14, 138:15 detailing [1] - 175:22 details [4] - 23:21, 96:11, 112:24, 152:8 detective [2] - 100:19, 191:28 Detective [2] - 100:20, 193:5 determine [1] - 19:25 determined [3] - 131:21, 138:15, 165:27 develop [2] - 8:7, 8:9 developing [2] - 122:13, 132:23 development [1] - 70:20 diaries [4] - 74:14, 74:19, 75:6, 109:29 DIARMAID [1] - 2:6 died [1] - 134:11 differ [2] - 25:27, 40:29 difference [2] - 10:7, 45:14 differences [1] - 25:4 different [14] - 27:2, 29:2, 31:3, 31:4, 45:19, 46:3, 92:3, 105:12, 144:2, 167:28, 180:6, 188:26, 191:8, 195:15 differs [1] - 13:26 difficult [6] - 9:5, 9:9, 11:14, 153:2, 166:2, 186:8 difficulties [10] - 12:4, 140:28, 142:19, 144:4, 164:23, 180:2, 183:8, 185:6, 185:9, 186:7 difficulty [11] - 28:21, 29:14, 73:19, 111:24, 130:19, 136:6, 163:25, 181:10, 183:21, 194:7, 195:6 DIGNAM [8] - 2:15, 5:16, 187:12, 187:14, 187:15, 191:5, 191:10, 194:8</p>
D				
<p>d' [1] - 13:8 d's [4] - 50:12, 59:3, 59:4, 59:25 D's [2] - 58:4, 176:28 Dail [1] - 161:22 daily [1] - 79:27 Daly [7] - 16:27, 41:18, 75:29, 77:18, 101:23, 106:14, 161:11 DALY [1] - 3:29 damaging [3] - 59:7, 64:22, 65:11 dangerous [1] - 194:28 DANIEL [1] - 3:26 dark [1] - 15:5 DARRAGH [1] - 4:14 DARREN [1] - 4:10 DARRYL [1] - 3:28 date [12] - 12:27, 13:23, 25:12, 25:24, 47:3, 54:13, 54:17, 118:9, 159:9, 170:11, 178:27, 187:25 dated [2] - 73:6, 124:27 daughter [1] - 146:9 Dave [2] - 21:12, 21:20 DAVID [3] - 4:2, 5:3, 6:4 David [4] - 30:12, 48:5, 75:16, 184:27 DAY [1] - 1:18 days [10] - 39:21, 68:10, 68:22, 80:27, 81:3, 82:4, 154:23, 178:28, 179:1, 186:2 deal [21] - 17:25, 27:5, 43:24, 44:20, 46:26, 85:4, 91:29,</p>				

<p>Dignam [1] - 187:15 dinner [2] - 61:5 direct [7] - 24:7, 41:24, 70:14, 108:16, 114:13, 115:6, 117:16 directed [17] - 35:5, 55:4, 56:22, 123:19, 124:2, 124:12, 132:5, 142:28, 144:19, 171:15, 173:3, 173:17, 173:19, 173:21, 173:23, 174:8, 184:14 directing [2] - 57:4, 170:21 direction [23] - 45:24, 67:21, 67:23, 98:9, 98:10, 124:13, 132:2, 132:4, 135:21, 166:12, 168:20, 170:19, 171:4, 171:6, 172:1, 172:27, 173:11, 174:7, 174:9, 174:17, 175:25, 184:12, 192:16 Direction [1] - 173:16 directions [7] - 51:22, 52:2, 171:2, 172:3, 176:3, 184:4, 184:5 directly [6] - 33:17, 41:13, 117:27, 118:10, 122:17, 123:2 DIRECTLY [2] - 5:13, 116:18 Director [2] - 68:5, 68:12 disagree [8] - 8:8, 18:21, 18:22, 18:27, 23:5, 37:3, 62:14, 102:16 disagreeing [1] - 62:16 disappointed [5] - 11:16, 12:12, 93:6, 103:18, 103:22 disarray [1] - 42:3 discharge [1] - 10:10 disciplinary [3] - 42:6, 42:13, 131:11 discipline [2] - 86:8, 86:27 disciplined [1] - 171:1 disclose [1] - 184:15 disclosed [1] - 190:10 disclosing [1] - 46:1 disclosure [21] -</p>	<p>17:12, 26:21, 26:24, 30:27, 30:28, 40:3, 42:27, 47:15, 47:18, 47:26, 47:27, 72:19, 79:10, 91:19, 92:29, 99:6, 100:7, 100:16, 106:6, 106:26, 190:12 DISCLOSURES [2] - 1:3, 1:4 disclosures [2] - 76:23, 95:24 discommoding [1] - 96:16 discreet [1] - 156:12 discrete [1] - 182:20 discuss [2] - 150:13, 180:24 discussed [14] - 84:25, 87:3, 87:13, 87:14, 87:17, 97:20, 97:22, 97:28, 98:1, 98:4, 146:1, 146:5, 152:9, 154:15 discussing [2] - 176:7, 186:22 discussion [2] - 65:7, 97:12 discussions [2] - 16:13, 48:25 disfunction [4] - 128:8, 131:9, 164:16, 164:21 disgusting [5] - 38:23, 38:24, 38:26, 39:4, 39:20 disgusting [1] - 39:18 displayed [1] - 190:17 disposed [1] - 185:26 disputes [2] - 43:22, 43:26 disregard [1] - 187:29 disseminated [1] - 133:11 distinct [1] - 190:11 distinctly [1] - 147:15 distorted [1] - 146:27 distress [1] - 137:1 distressed [2] - 181:8, 183:18 distressing [1] - 152:12 distribute [2] - 173:19, 174:9 distributed [2] -</p>	<p>132:6, 175:13 disturbance [1] - 34:7 division [1] - 38:27 DMG [1] - 3:18 DOCK [1] - 3:30 doctrine [1] - 162:29 document [12] - 30:28, 40:13, 86:9, 86:11, 86:15, 87:11, 171:23, 171:27, 173:15, 173:21, 175:24, 176:2 documentary [1] - 71:12 documentation [4] - 121:21, 132:4, 142:27, 157:24 documents [8] - 41:7, 72:2, 95:28, 95:29, 132:5, 157:20, 174:18, 176:4 dogmatic [1] - 129:13 domestic [1] - 96:16 DONAL [1] - 2:16 done [25] - 7:22, 7:23, 7:29, 8:15, 9:18, 10:6, 42:9, 53:2, 53:3, 54:12, 90:14, 109:10, 109:24, 121:23, 124:15, 125:21, 126:1, 129:1, 131:14, 137:12, 137:27, 167:7, 179:25, 182:13, 192:23 Donegal [1] - 110:14 door [2] - 106:28, 190:29 dossier [1] - 154:12 doubt [2] - 128:6, 128:10 down [29] - 8:14, 11:9, 12:11, 12:14, 31:17, 41:11, 74:11, 75:26, 81:16, 82:3, 82:6, 85:1, 85:17, 86:21, 86:25, 88:14, 93:5, 99:19, 101:19, 106:8, 112:25, 114:21, 129:27, 154:14, 156:14, 159:21, 162:11, 181:13, 186:9 downloaded [1] - 79:8 dozens [2] - 99:20 DPP [7] - 107:18, 144:19, 145:25, 149:3, 184:5, 184:14,</p>	<p>184:16 DPP's [2] - 184:4, 184:11 drafted [1] - 165:22 draw [2] - 57:11, 57:20 drawn [2] - 64:23, 170:10 drew [1] - 50:26 drift [1] - 160:18 drifts [1] - 37:18 drink [1] - 149:11 dropped [3] - 11:8, 11:11, 71:16 DUBLIN [13] - 1:17, 2:12, 2:20, 2:25, 2:30, 3:8, 3:13, 3:23, 3:31, 4:4, 4:8, 4:12, 4:21 Dublin [5] - 54:15, 68:28, 69:4, 69:9, 96:11 due [5] - 9:6, 57:2, 80:27, 189:26, 196:9 Duff [6] - 89:19, 90:2, 90:4, 90:10, 90:27, 91:3 Dundalk [1] - 75:3 during [25] - 10:11, 10:20, 17:28, 67:21, 69:16, 79:27, 100:29, 104:11, 104:13, 116:28, 117:9, 137:5, 137:12, 139:8, 152:9, 154:29, 156:5, 166:25, 171:6, 176:24, 177:9, 189:12, 189:21, 192:1, 196:12 duties [3] - 10:11, 10:15, 83:22 duty [5] - 155:9, 171:21, 183:17, 188:4, 190:6 DÁIL [1] - 1:5 Dáil [36] - 17:1, 36:17, 38:6, 77:16, 77:23, 121:6, 121:17, 121:24, 122:6, 126:19, 132:12, 137:4, 137:25, 138:9, 138:12, 140:19, 148:22, 148:27, 149:10, 154:12, 154:23, 155:11, 155:12, 159:7, 160:25, 160:27, 161:3, 161:9, 161:16, 162:24, 166:20, 176:6, 180:18, 182:27, 183:3, 195:13</p>	<p style="text-align: center;">E</p> <p>e-mail [4] - 169:24, 169:27, 169:28, 169:29 EARLSFORT [1] - 4:4 early [4] - 147:18, 157:28, 158:2, 167:4 ears [2] - 33:22, 38:4 eat [1] - 61:5 Eavan [3] - 50:11, 51:15, 81:18 editor [1] - 68:12 effect [5] - 57:22, 107:13, 148:8, 164:23, 184:5 effective [1] - 77:14 effectively [5] - 42:2, 134:2, 134:10, 167:13, 174:3 effort [1] - 141:14 efforts [2] - 137:15, 194:24 Eileen [1] - 116:12 EILEEN [1] - 4:19 Eireann [1] - 161:23 either [14] - 61:1, 65:10, 84:25, 98:12, 102:6, 139:10, 139:11, 139:25, 140:8, 149:26, 163:5, 180:23, 185:24, 195:21 element [1] - 133:26 elicit [1] - 14:8 ELIZABETH [1] - 2:7 elsewhere [1] - 45:29 ELY [1] - 4:21 em [2] - 28:20, 47:9 email [9] - 89:14, 90:15, 90:17, 90:18, 90:23, 91:5, 124:4, 130:9 emails [2] - 97:5, 130:3 embarrassment [1] - 183:21 embittered [1] - 108:23 emerge [1] - 86:27 emerged [1] - 169:3 EMMA [1] - 2:18 en [1] - 35:20 encounter [1] - 177:25 encourage [3] - 72:7, 155:27, 167:12</p>
--	--	---	---	--

<p>encouraged [2] - 123:8, 172:1</p> <p>end [19] - 23:1, 25:23, 27:27, 31:28, 51:10, 56:2, 121:6, 121:10, 123:10, 125:9, 138:16, 138:29, 141:1, 145:27, 153:26, 173:21, 179:29, 187:11, 191:12</p> <p>ended [1] - 100:2</p> <p>ending [1] - 153:26</p> <p>energy [1] - 102:20</p> <p>engage [22] - 48:27, 118:5, 123:2, 123:4, 123:8, 129:20, 130:16, 132:9, 140:2, 140:6, 142:2, 144:26, 167:11, 167:13, 173:22, 173:23, 173:24, 174:1, 174:3, 174:8, 174:12, 195:11</p> <p>engage' [1] - 174:2</p> <p>engaged [19] - 32:11, 32:13, 95:27, 117:13, 118:20, 128:22, 129:2, 129:20, 131:2, 137:7, 138:18, 149:15, 149:19, 180:8, 182:2, 189:29, 193:26, 195:8</p> <p>engagement [20] - 67:28, 129:11, 129:29, 135:20, 137:16, 142:22, 148:4, 151:4, 155:23, 164:25, 168:12, 174:6, 175:7, 175:9, 175:16, 175:18, 176:16, 186:8, 187:20, 193:27</p> <p>engaging [2] - 46:6, 149:12</p> <p>enjoy [1] - 102:17</p> <p>enjoyed [3] - 102:21, 105:14, 105:16</p> <p>enlarged [1] - 29:11</p> <p>enlargement [1] - 31:2</p> <p>enormity [1] - 152:19</p> <p>enormous [5] - 134:3, 134:14, 141:3, 153:1, 185:6</p> <p>ensue [1] - 69:8</p> <p>ensure [5] - 120:15, 126:1, 131:5, 143:17, 165:16</p> <p>enthusiasm [1] - 151:27</p>	<p>entirely [1] - 163:11</p> <p>entirety [1] - 126:23</p> <p>entitled [7] - 55:17, 96:3, 100:18, 123:9, 156:22, 188:1, 191:7</p> <p>entitlement [1] - 167:16</p> <p>entries [1] - 74:17</p> <p>entry [1] - 74:29</p> <p>Environment [1] - 180:5</p> <p>EQUALITY [1] - 1:9</p> <p>equality [2] - 124:3, 132:19</p> <p>equally [1] - 195:14</p> <p>equation [1] - 41:12</p> <p>erased [1] - 115:24</p> <p>erratic [3] - 142:21, 185:14, 186:8</p> <p>erroneous [1] - 80:10</p> <p>essential [1] - 190:13</p> <p>essentially [7] - 121:12, 134:23, 139:6, 152:15, 152:23, 153:13, 183:23</p> <p>establish [1] - 65:13</p> <p>established [3] - 127:26, 189:11, 190:4</p> <p>ESTABLISHED [1] - 1:8</p> <p>esteem [1] - 10:29</p> <p>estimate [1] - 23:4</p> <p>etcetera [2] - 74:2, 74:3</p> <p>ethics [5] - 62:24, 62:28, 63:3, 67:27</p> <p>Europe [1] - 67:10</p> <p>European [3] - 62:13, 62:20, 63:13</p> <p>Eurovision [1] - 59:24</p> <p>evening [1] - 90:29</p> <p>event [16] - 11:9, 12:27, 34:21, 35:21, 49:20, 54:13, 66:22, 91:2, 96:16, 102:28, 103:3, 105:2, 147:25, 152:16, 183:14, 190:1</p> <p>events [12] - 84:14, 97:24, 121:9, 146:28, 174:24, 175:23, 176:7, 176:8, 183:13, 189:13, 193:22</p> <p>eventually [1] - 114:15</p> <p>evidence [86] - 6:8, 13:16, 13:21, 13:28,</p>	<p>14:23, 17:21, 19:16, 19:24, 20:7, 20:10, 22:22, 22:23, 24:8, 25:14, 25:17, 38:18, 41:24, 43:5, 43:12, 47:2, 47:5, 49:5, 50:9, 50:14, 51:23, 51:27, 52:11, 53:10, 53:24, 55:13, 55:15, 56:26, 57:3, 58:21, 58:24, 59:10, 60:4, 63:20, 64:13, 64:15, 64:24, 64:29, 65:13, 65:16, 65:19, 65:20, 71:13, 74:5, 75:2, 75:7, 79:1, 79:4, 79:5, 82:16, 86:1, 86:13, 91:14, 95:8, 99:15, 100:9, 100:11, 100:13, 100:23, 102:18, 102:20, 102:23, 115:9, 115:19, 115:20, 125:13, 129:18, 133:2, 133:15, 140:18, 146:23, 148:8, 157:11, 157:16, 157:19, 157:21, 166:8, 166:17, 168:12, 169:7, 169:14, 175:22</p> <p>EVIDENCE [1] - 1:9</p> <p>evidence-based [1] - 64:13</p> <p>evidential [1] - 57:11</p> <p>evolution [1] - 54:29</p> <p>exact [8] - 25:24, 42:9, 59:9, 119:7, 128:25, 150:27, 154:6, 178:27</p> <p>exactly [8] - 31:16, 38:20, 54:25, 66:18, 78:12, 135:9, 175:29, 178:8</p> <p>exaggerated [1] - 146:22</p> <p>examination [9] - 90:14, 189:12, 189:21, 190:14, 191:12, 191:19, 193:10, 193:12, 193:13</p> <p>examine [6] - 60:9, 71:29, 118:24, 120:19, 189:21, 196:11</p> <p>examined [5] - 29:1, 84:12, 119:18, 137:10, 182:7</p> <p>EXAMINED [22] -</p>	<p>5:4, 5:5, 5:6, 5:7, 5:8, 5:9, 5:13, 5:14, 5:15, 5:16, 5:17, 6:4, 48:12, 50:6, 67:1, 70:1, 71:20, 116:19, 159:1, 184:24, 187:14, 194:16</p> <p>EXAMINER [1] - 3:25</p> <p>Examiner [3] - 17:22, 61:25, 65:28</p> <p>examining [2] - 57:13, 189:18</p> <p>example [4] - 96:10, 96:17, 115:21, 134:6</p> <p>exams [1] - 153:4</p> <p>except [2] - 63:3, 112:4</p> <p>exceptional [1] - 190:10</p> <p>EXCHANGE [1] - 3:29</p> <p>exchange [7] - 18:5, 155:17, 161:11, 169:24, 186:5, 187:22, 188:19</p> <p>exchanges [2] - 122:6, 122:7</p> <p>excuse [2] - 63:24, 185:7</p> <p>executed [1] - 98:9</p> <p>exercise [1] - 20:11</p> <p>exercised [2] - 93:23, 185:16</p> <p>exercising [1] - 93:20</p> <p>exhaust [2] - 45:20, 46:4</p> <p>exist [1] - 181:21</p> <p>existed [2] - 167:17, 195:7</p> <p>exonerated [2] - 163:18, 163:28</p> <p>exotic [2] - 131:18, 196:2</p> <p>expand [1] - 67:15</p> <p>expect [1] - 130:29</p> <p>expectation [1] - 189:29</p> <p>expected [4] - 136:8, 137:4, 149:14, 169:4</p> <p>expecting [4] - 11:12, 104:2, 106:28, 151:25</p> <p>experience [1] - 137:14</p> <p>experienced [3] - 142:20, 185:6, 185:10</p> <p>expert [1] - 79:9</p> <p>explain [4] - 29:20, 81:10, 122:18, 147:2</p>	<p>explained [2] - 126:8, 188:20</p> <p>explains [1] - 191:19</p> <p>explanation [2] - 40:18, 79:16</p> <p>explore [1] - 16:9</p> <p>explored [1] - 145:25</p> <p>explosive [1] - 39:1</p> <p>exposed [1] - 41:20</p> <p>express [1] - 67:25</p> <p>expressed [2] - 129:23, 133:9</p> <p>expressing [1] - 109:15</p> <p>expression [2] - 35:13, 46:24</p> <p>extend [1] - 43:4</p> <p>extensive [1] - 74:7</p> <p>extensively [1] - 64:14</p> <p>extent [4] - 30:17, 107:26, 164:6, 185:20</p> <p>extracting [1] - 74:16</p> <p>extradition [1] - 97:4</p> <p>extraordinarily [1] - 146:15</p> <p>extraordinary [2] - 79:15, 196:5</p> <p>extreme [1] - 112:18</p> <p>extremely [6] - 62:22, 67:18, 96:15, 96:22, 131:4</p> <p>eye [1] - 53:23</p> <p>eyes [1] - 142:28</p> <p>eyesight [1] - 159:28</p>
F				
<p>face [2] - 54:11, 108:24</p> <p>faced [1] - 165:3</p> <p>facilitate [1] - 123:7</p> <p>facilities [1] - 68:1</p> <p>facing [2] - 42:14, 44:2</p> <p>fact [69] - 15:1, 16:4, 16:23, 18:4, 19:22, 30:5, 32:16, 37:7, 39:22, 45:16, 50:27, 54:15, 57:17, 57:21, 58:24, 62:29, 63:16, 63:17, 65:14, 70:11, 70:18, 71:3, 71:15, 88:3, 88:26, 92:1, 106:12, 113:12, 114:12, 115:25, 123:22, 126:9, 130:1, 134:15, 134:19, 138:17, 143:15,</p>				

<p>150:4, 151:17, 153:8, 153:9, 154:15, 158:1, 159:23, 160:4, 161:29, 164:13, 167:25, 168:5, 168:6, 169:5, 170:9, 171:29, 172:24, 172:26, 173:2, 173:8, 174:28, 175:3, 175:4, 176:8, 176:13, 181:3, 181:6, 184:11, 184:14, 188:20, 191:22, 192:4</p> <p>factor [7] - 62:17, 62:18, 62:20, 62:23, 63:10, 103:10, 103:15</p> <p>facts [3] - 64:23, 133:8, 137:10</p> <p>factual [3] - 64:10, 142:4, 189:18</p> <p>failed [2] - 117:29, 171:3</p> <p>failing [1] - 113:9</p> <p>failure [2] - 131:10, 164:17</p> <p>fair [6] - 16:6, 61:25, 111:22, 112:2, 151:22, 193:2</p> <p>fairly [3] - 9:1, 48:19, 138:7</p> <p>fairness [6] - 16:15, 23:2, 36:19, 45:18, 48:14, 165:23</p> <p>faith [1] - 196:4</p> <p>false [5] - 97:9, 145:15, 153:27, 154:13, 165:6</p> <p>familiarise [1] - 45:2</p> <p>family [6] - 7:10, 54:21, 111:7, 145:13, 145:14, 151:26</p> <p>FANNING [3] - 3:5, 3:6, 3:11</p> <p>far [16] - 7:28, 14:19, 44:19, 57:7, 63:9, 64:25, 145:15, 156:27, 157:1, 166:27, 168:23, 169:1, 176:10, 176:11, 176:17, 176:24</p> <p>fashion [3] - 29:5, 108:16, 122:19</p> <p>fatal [2] - 127:28, 134:18</p> <p>father [1] - 25:21</p> <p>Father [6] - 26:12, 26:13, 26:23, 52:6, 53:4</p> <p>favour [2] - 45:29, 46:2</p>	<p>favourable [2] - 65:19, 65:21</p> <p>fear [2] - 41:12, 41:20</p> <p>featured [1] - 148:22</p> <p>February [9] - 58:1, 70:27, 135:16, 138:12, 138:29, 139:10, 140:9, 168:15, 170:6</p> <p>FEBRUARY [2] - 1:6, 1:10</p> <p>feeding [1] - 78:9</p> <p>feelings [1] - 7:5</p> <p>Fein [1] - 162:23</p> <p>FELIX [1] - 4:6</p> <p>fell [1] - 101:10</p> <p>fella [2] - 35:28, 36:2</p> <p>felt [9] - 42:9, 43:2, 53:6, 53:22, 110:24, 123:5, 182:4, 188:4, 190:26</p> <p>female [1] - 69:15</p> <p>Ferry [1] - 57:14</p> <p>FERRY [1] - 2:23</p> <p>fever [1] - 185:8</p> <p>few [12] - 43:20, 44:23, 49:28, 50:8, 107:7, 178:27, 179:1, 179:3, 184:25, 186:2, 187:12, 187:17</p> <p>fiddler [17] - 27:29, 28:1, 29:17, 30:5, 30:19, 33:21, 33:26, 35:9, 36:1, 36:5, 37:22, 37:26, 38:2, 39:19, 39:22, 39:26, 40:25</p> <p>fiddles [3] - 30:13, 35:29, 36:2</p> <p>fielded [1] - 84:29</p> <p>fight [1] - 145:17</p> <p>file [8] - 12:21, 12:29, 24:4, 24:5, 24:14, 87:6, 107:18, 111:25</p> <p>files [1] - 133:9</p> <p>fill [1] - 121:12</p> <p>final [4] - 120:5, 184:3, 193:8, 193:14</p> <p>finalised [1] - 191:20</p> <p>finally [2] - 47:14, 168:25</p> <p>finances [1] - 42:3</p> <p>financial [2] - 9:6, 12:3</p> <p>findings [3] - 133:4, 137:28, 164:9</p> <p>fine [8] - 63:28, 64:12, 66:4, 96:24, 96:29, 116:1, 158:19,</p>	<p>166:4</p> <p>Fine [1] - 180:4</p> <p>finish [3] - 173:26, 173:28, 178:14</p> <p>fire [5] - 85:7, 108:1, 108:10, 109:22</p> <p>first [72] - 6:27, 7:14, 15:22, 17:29, 18:18, 19:9, 22:10, 23:4, 23:7, 23:27, 25:9, 26:10, 26:17, 27:9, 27:10, 28:17, 28:18, 29:24, 30:4, 31:5, 40:3, 48:4, 62:24, 72:22, 72:26, 72:29, 73:21, 85:19, 87:29, 88:5, 88:13, 88:15, 88:22, 89:1, 89:3, 91:20, 107:9, 107:10, 114:2, 114:21, 114:24, 117:26, 118:13, 120:19, 120:23, 123:12, 123:21, 123:29, 126:24, 127:18, 130:29, 132:17, 136:19, 143:23, 150:5, 157:23, 157:26, 159:5, 159:8, 159:11, 159:25, 160:14, 160:25, 160:27, 161:5, 161:22, 161:24, 161:28, 162:4, 170:8, 177:27, 192:4</p> <p>firstly [8] - 12:20, 23:25, 43:22, 50:9, 71:24, 121:27, 152:10, 182:29</p> <p>FITZGERALD [1] - 2:17</p> <p>five [1] - 89:28</p> <p>fix [1] - 165:28</p> <p>fixated [2] - 42:7, 46:20</p> <p>fixed [10] - 70:13, 124:5, 124:7, 126:21, 127:25, 128:9, 138:1, 143:18, 164:16, 192:3</p> <p>fixing [1] - 121:8</p> <p>Flahive [14] - 118:5, 122:13, 122:29, 123:20, 124:2, 124:24, 124:25, 124:26, 129:16, 131:25, 133:19, 135:1, 142:6, 167:10</p> <p>flatly [1] - 12:21</p> <p>flattered [5] - 101:29, 102:11, 102:13,</p>	<p>102:15, 102:16</p> <p>FLOOR [1] - 4:15</p> <p>flow [1] - 31:22</p> <p>focus [3] - 15:18, 99:24, 162:14</p> <p>focused [1] - 33:4</p> <p>followed [2] - 26:25, 133:17</p> <p>FOLLOWING [1] - 1:5</p> <p>following [15] - 1:26, 23:25, 30:6, 57:17, 58:14, 58:20, 59:14, 93:10, 108:28, 109:9, 125:24, 129:8, 161:24, 176:6, 186:25</p> <p>FOLLOWS [11] - 6:1, 6:5, 48:13, 50:6, 67:1, 70:2, 71:21, 107:6, 116:8, 116:19, 194:16</p> <p>follows [1] - 179:8</p> <p>foot [4] - 65:13, 68:17, 72:6, 74:27</p> <p>FOR [18] - 1:8, 2:6, 2:9, 2:14, 2:22, 2:27, 3:1, 3:4, 3:10, 3:15, 3:20, 3:25, 4:1, 4:6, 4:10, 4:14, 4:19, 116:5</p> <p>force [7] - 124:14, 124:20, 132:6, 134:5, 146:12, 171:1, 176:12</p> <p>forced [5] - 164:7, 164:14, 165:19, 165:20, 165:26</p> <p>forceful [1] - 77:14</p> <p>forcing [1] - 165:18</p> <p>fore [1] - 128:11</p> <p>foremost [1] - 159:5</p> <p>foresight [1] - 101:16</p> <p>forever [1] - 96:23</p> <p>forget [2] - 26:7, 47:24</p> <p>forgiveness [1] - 53:3</p> <p>forgotten [3] - 74:5, 74:6, 74:8</p> <p>form [4] - 78:11, 147:6, 186:11, 188:14</p> <p>formal [4] - 36:17, 38:8, 68:17, 189:18</p> <p>formally [4] - 40:24, 192:5, 195:8, 195:10</p> <p>format [3] - 120:25, 166:1, 183:1</p> <p>former [12] - 9:11, 31:22, 43:15, 51:1, 51:14, 51:18, 101:28, 138:3, 179:28,</p>	<p>181:24, 182:1, 184:28</p> <p>forms [1] - 47:16</p> <p>formulating [1] - 85:8</p> <p>forth [1] - 138:7</p> <p>fortunately [1] - 171:24</p> <p>forward [9] - 18:23, 104:19, 104:24, 128:29, 133:2, 148:5, 189:29, 194:19, 195:11</p> <p>forwarded [1] - 193:18</p> <p>foundation [1] - 194:20</p> <p>four [3] - 32:6, 81:27, 135:10</p> <p>Four [1] - 191:9</p> <p>frailties [1] - 196:14</p> <p>FRANCIS [1] - 3:22</p> <p>frank [1] - 75:15</p> <p>Frank [1] - 86:12</p> <p>frankly [4] - 153:14, 155:20, 165:18, 182:14</p> <p>free [1] - 188:12</p> <p>FREEMAN [1] - 3:5</p> <p>frenzy [3] - 156:13, 165:15, 183:23</p> <p>frequently [2] - 147:28, 181:11</p> <p>Friday [1] - 71:27</p> <p>FRIDAY [1] - 197:6</p> <p>friend [1] - 114:12</p> <p>friendly [1] - 10:6</p> <p>friends [1] - 114:9</p> <p>from' [1] - 59:22</p> <p>front [10] - 26:27, 33:9, 36:16, 124:29, 126:24, 170:4, 173:11, 177:14, 191:2</p> <p>frustrated [1] - 154:18</p> <p>fucking [2] - 36:10, 37:9</p> <p>full [12] - 14:14, 14:16, 15:3, 72:24, 73:22, 107:26, 122:21, 133:7, 171:24, 174:5, 176:22, 191:18</p> <p>fullest [1] - 99:5</p> <p>fully [22] - 14:21, 14:24, 14:28, 15:4, 15:7, 15:15, 15:24, 94:5, 94:13, 111:20, 111:26, 112:9, 112:10, 113:28, 114:19, 114:20,</p>
---	---	--	--	--

<p>131:22, 137:7, 144:18, 190:1 fulsome [2] - 136:17, 138:8 fundamental [1] - 48:19 furnish [1] - 171:27 furnished [3] - 118:17, 136:12, 166:29 furore [3] - 39:5, 39:21, 39:25 FURTHER [2] - 5:8, 70:1 FÍONÁN [1] - 2:27</p>	<p>173:12, 174:10, 175:11, 175:13, 175:28, 176:12, 176:14, 187:11, 187:16, 189:8, 189:14, 190:2, 190:5, 195:8, 196:18 garda [1] - 109:11 Gardaí [12] - 34:6, 107:21, 120:8, 131:9, 131:11, 141:2, 144:27, 164:18, 164:19, 165:22, 169:2, 194:1 Gemma [2] - 67:4, 70:4 GEMMA [1] - 4:14 general [9] - 48:22, 89:4, 122:14, 127:10, 127:12, 134:6, 176:17, 176:18, 190:20 General [3] - 161:26, 162:1, 164:9 generally [2] - 23:8, 127:9 genuine [1] - 20:13 genuinely [6] - 125:20, 126:11, 126:14, 143:16, 148:14, 154:26 GEORGE'S [1] - 3:30 Ger [1] - 191:29 GERAGHTY [1] - 4:7 GILLANE [2] - 3:1, 187:6 girl [1] - 146:11 given [26] - 23:4, 24:16, 29:13, 58:25, 60:4, 61:15, 62:6, 65:1, 65:19, 65:20, 72:6, 79:4, 92:27, 132:3, 157:10, 160:3, 160:5, 166:9, 166:12, 168:20, 169:14, 169:15, 172:27, 176:3, 179:7, 185:18 Gordon [7] - 157:23, 158:26, 159:3, 167:27, 172:15, 180:20, 187:22 GORDON [18] - 2:10, 5:14, 157:7, 158:25, 158:28, 159:1, 159:2, 160:10, 163:7, 168:1, 168:5, 172:18, 172:22, 174:20, 174:27, 177:23, 180:22, 184:21 gossip [3] - 148:28,</p>	<p>149:6, 149:21 governing [1] - 190:7 government [2] - 118:11, 125:24 graduating [1] - 147:28 Grafton [3] - 34:7, 34:19, 34:26 grand [1] - 99:23 granted [3] - 60:3, 60:13, 66:15 grateful [4] - 72:12, 72:14, 113:26, 116:2 great [11] - 10:27, 49:8, 53:8, 102:18, 102:19, 102:27, 150:23, 163:1, 181:9, 184:2 greatly [1] - 103:4 grievance [5] - 42:4, 92:27, 103:24, 103:29, 107:20 GRIFFIN [1] - 2:18 grossly [2] - 105:23, 172:2 ground [3] - 64:20, 65:15, 115:19 GROUP [1] - 3:20 group [9] - 32:24, 33:6, 33:7, 33:11, 33:20, 33:28, 98:11, 187:27, 187:28 groups [2] - 180:12, 181:12 GSOC [3] - 135:6, 182:28, 196:27 guard [4] - 24:24, 25:1, 35:12, 35:13 guards [3] - 32:18, 32:19, 141:9 Guerin [11] - 119:8, 148:24, 151:26, 153:9, 153:29, 154:25, 179:28, 183:2, 183:3, 183:7, 183:9 guess [4] - 80:8, 80:11, 80:14, 81:5 guessed [1] - 139:11 guile [1] - 101:17 Gwen [1] - 1:25 GWEN [1] - 1:30</p>	<p>halfway [1] - 159:21 HALIDAY [1] - 2:11 HALL [2] - 3:7, 3:12 HAMILTON [1] - 3:16 HANAHOE [1] - 2:24 hand [4] - 32:3, 64:8, 102:1, 102:12 hand-picked [1] - 102:1 handed [1] - 129:27 handing [1] - 33:14 handle [1] - 185:12 hands [3] - 18:24, 19:25, 180:28 happy [3] - 94:10, 105:22, 106:19 Harcourt [3] - 68:6, 68:23, 69:3 hard [4] - 160:3, 166:1, 177:15, 177:17 HARRINGTON [1] - 3:2 Harrison [1] - 47:25 hat [8] - 32:2, 32:4, 32:5, 32:28, 33:5, 33:14, 34:15, 35:7 HATCH [4] - 3:7, 3:7, 3:12, 3:12 hats [1] - 32:2 Haughey [1] - 61:2 have [1] - 93:17 HAVING [1] - 116:18 hawked [1] - 42:23 hay [1] - 185:8 HAYES [1] - 4:3 hazy [1] - 159:26 head [6] - 82:25, 132:10, 146:17, 147:16, 161:13, 161:16 Head [1] - 107:13 headbangers [1] - 36:10 headed [3] - 88:12, 122:15, 173:15 header [1] - 37:9 heading [4] - 159:15, 159:19, 159:25, 181:13 headline [1] - 14:5 Headquarters [5] - 24:5, 24:15, 43:10, 71:5, 115:17 headquarters [1] - 114:17 Health [1] - 180:5 hear [32] - 21:25, 25:14, 25:17, 32:26, 32:27, 33:3, 33:12, 33:18, 33:19, 33:22,</p>	<p>34:9, 34:10, 34:22, 35:4, 35:21, 35:22, 35:23, 35:25, 35:28, 36:3, 36:7, 39:9, 43:7, 43:19, 76:19, 77:4, 77:27, 77:29, 92:22, 119:14, 148:12, 166:3 heard [33] - 27:28, 30:20, 30:23, 33:21, 33:24, 33:28, 35:8, 36:1, 36:4, 36:6, 36:20, 36:23, 36:27, 37:5, 37:15, 37:22, 37:26, 38:1, 38:10, 38:15, 38:22, 40:9, 40:21, 43:9, 52:11, 53:7, 53:10, 65:28, 115:9, 148:7, 154:18, 185:23 hearing [11] - 16:6, 30:8, 36:12, 36:15, 84:21, 87:19, 139:3, 157:4, 163:25, 186:2, 193:2 HEARING [4] - 6:1, 116:5, 116:8, 197:6 hearings [1] - 132:24 hearsay [1] - 47:22 heart [1] - 53:8 heightened [2] - 7:6, 189:5 held [6] - 10:29, 68:14, 69:2, 129:23, 129:25, 147:22 HELD [1] - 1:17 hell [1] - 156:14 help [12] - 11:22, 12:16, 12:17, 36:7, 86:18, 99:4, 116:2, 153:22, 154:10, 157:20, 157:23, 158:24 helpful [1] - 124:18 helps [1] - 158:25 heroic [1] - 153:1 herself [1] - 62:3 hidden [1] - 46:12 Higgins [3] - 127:3, 160:19, 163:13 high [3] - 10:29, 111:3, 111:5 highest [1] - 67:25 highlighted [1] - 91:19 highlighting [2] - 74:17, 131:8 highly [1] - 8:27 himself [6] - 32:17, 66:9, 135:15, 166:26, 168:28, 192:2</p>
G				
<p>Gael [1] - 180:4 Gallagher [1] - 116:13 GALLAGHER [2] - 4:20, 4:20 game [1] - 114:15 Garda [103] - 24:5, 24:14, 31:22, 33:28, 36:17, 38:7, 39:8, 43:10, 43:27, 45:20, 46:1, 46:5, 46:28, 48:26, 49:1, 51:28, 52:1, 67:29, 68:1, 69:3, 69:17, 71:4, 85:21, 86:27, 97:18, 97:24, 98:8, 98:15, 98:29, 99:1, 99:11, 99:15, 111:7, 112:12, 115:17, 118:21, 119:22, 119:27, 120:13, 120:17, 122:15, 123:2, 124:12, 124:21, 128:18, 128:19, 128:28, 129:3, 129:10, 129:27, 131:20, 132:2, 132:6, 132:29, 134:5, 134:27, 134:28, 135:3, 135:21, 136:28, 137:7, 137:19, 138:3, 138:19, 139:3, 139:28, 141:7, 142:1, 142:3, 143:1, 143:19, 147:26, 150:11, 151:3, 158:17, 162:10, 164:11, 165:25, 167:19, 169:10, 169:19, 169:22, 170:13, 171:1, 171:21, 173:5,</p>				
		H		
		<p>habit [1] - 181:11 half [3] - 52:24, 152:6, 191:28</p>		

<p>hint [1] - 43:9 historic [2] - 174:24 historical [1] - 174:25 hmm [13] - 8:24, 18:3, 38:3, 60:15, 80:29, 90:9, 91:26, 126:28, 159:14, 162:16, 164:1, 170:25, 172:29 hold [1] - 20:21 holding [1] - 18:15 holds [1] - 45:18 holidays [1] - 115:4 home [10] - 6:16, 6:22, 9:12, 9:17, 9:20, 9:25, 12:7, 13:8, 39:16, 42:3 honest [4] - 24:18, 84:8, 87:26, 163:18 hope [3] - 60:7, 137:24, 190:25 hopeful [1] - 12:7 hopefully [1] - 126:23 hoping [1] - 11:12 hornet's [1] - 153:17 horrendous [1] - 145:25 horse [4] - 34:28, 34:29, 35:23 horses [5] - 34:7, 34:9, 34:14, 34:18, 34:19 hotel [2] - 152:1, 176:29 Hotel [3] - 27:15, 176:29, 177:3 hounds [1] - 156:14 hour [4] - 52:24, 152:6, 191:28 hour's [1] - 116:2 house [25] - 10:11, 10:15, 22:6, 50:12, 52:15, 52:18, 53:11, 58:4, 59:3, 59:5, 61:17, 67:7, 67:13, 67:19, 81:2, 82:15, 106:16, 127:13, 129:2, 137:18, 137:21, 176:28, 177:2, 192:23 House [3] - 148:9, 149:21, 181:25 HOUSE [4] - 2:11, 2:19, 3:22, 4:3 house' [1] - 59:25 household [3] - 13:8, 13:12, 13:20 Houses [1] - 176:25</p>	<p>houses [3] - 97:4, 121:18, 148:16 HQ [1] - 86:27 hr [1] - 179:16 huge [4] - 39:20, 85:20, 97:5, 131:3 Human [2] - 62:13, 62:20 hundreds [1] - 77:21 hurt [1] - 70:7 husband [13] - 15:14, 16:5, 16:24, 19:10, 42:8, 99:26, 100:2, 100:24, 100:28, 105:26, 106:3, 106:4, 106:23 hyperbole [2] - 162:20, 165:5</p> <p style="text-align: center;">I</p> <p>idea [2] - 146:10, 185:18 ideal [1] - 182:21 ideas [1] - 114:17 identical [1] - 17:17 identified [13] - 18:18, 61:21, 73:7, 98:11, 164:16, 164:17, 164:19, 164:21, 164:24, 164:26, 165:17, 166:22, 196:14 identify [5] - 12:26, 63:1, 74:29, 98:14, 189:22 identifying [1] - 74:16 identity [6] - 140:7, 169:23, 190:8, 190:9, 192:5, 194:23 IFSC [1] - 3:30 ignite [1] - 156:13 ignoring [1] - 119:15 illegitimate [1] - 114:18 imagine [2] - 50:3, 52:24 immediate [1] - 39:14 immediately [2] - 38:19, 138:20 immensely [1] - 113:29 impact [1] - 134:16 impacted [3] - 144:24, 147:5, 155:25 impacting [1] - 144:25</p>	<p>impair [1] - 124:15 impart [1] - 146:1 impediment [1] - 33:1 implemented [1] - 128:12 implementing [1] - 126:2 implicating [1] - 115:27 imply [1] - 102:6 implying [1] - 171:3 importance [3] - 71:1, 136:25, 188:12 important [8] - 19:21, 19:26, 46:24, 62:22, 124:11, 138:16, 146:21, 165:13 imposed [2] - 61:28, 65:22 imposition [1] - 134:12 impression [3] - 46:19, 58:10, 126:7 improper [6] - 20:1, 105:23, 105:27, 107:23, 124:5 improperly [1] - 115:18 impropriety [2] - 46:15, 149:1 improved [2] - 29:11, 40:20 IN [1] - 1:17 inaccurate [4] - 92:25, 94:9, 95:1, 130:22 inadequate [1] - 164:10 inappropriate [6] - 35:5, 45:17, 45:19, 139:24, 185:4, 185:23 incandescent [1] - 67:17 incident [2] - 95:16, 97:5 include [2] - 72:22, 97:3 included [9] - 33:8, 71:7, 71:15, 74:9, 80:2, 127:23, 155:28, 156:2, 166:12 including [3] - 29:2, 61:26, 188:8 inclusion [1] - 135:12 incomplete [2] - 94:8, 95:1 inconsistency [1] -</p>	<p>164:11 incorporated [2] - 99:2, 193:13 incorrect [7] - 14:23, 92:10, 95:1, 128:21, 129:17, 129:19, 137:20 incorrectly [1] - 115:9 indeed [8] - 44:8, 62:9, 124:29, 131:25, 133:4, 146:1, 176:24, 189:16 INDEPENDENT [1] - 3:4 Independent [4] - 67:25, 68:5, 68:15, 69:14 independent [7] - 82:8, 82:11, 82:23, 120:15, 129:28, 132:29, 150:27 INDEX [1] - 5:1 indicate [8] - 23:3, 33:2, 50:27, 71:3, 71:11, 108:2, 108:22, 129:18 indicated [21] - 6:14, 6:18, 13:17, 17:26, 19:8, 22:29, 23:28, 47:11, 50:15, 52:15, 57:13, 59:12, 61:13, 63:8, 64:4, 67:8, 69:12, 70:24, 109:28, 121:14, 147:3 indicates [4] - 15:8, 17:26, 19:15, 24:23 indication [2] - 24:27, 53:15 indictment [1] - 191:1 individual [6] - 72:16, 114:28, 133:10, 150:22, 172:20, 181:8 individuals [8] - 48:3, 99:16, 121:6, 121:17, 121:23, 128:27, 134:10, 181:12 individuals' [1] - 121:20 inevitably [1] - 44:2 inextricably [1] - 175:26 infective [1] - 183:25 inference [1] - 65:12 inferences [1] - 64:23 informant [3] -</p>	<p>194:23, 195:20, 195:26 information [42] - 14:3, 14:12, 14:20, 46:2, 51:15, 61:21, 87:1, 87:5, 87:8, 89:10, 91:10, 92:1, 92:15, 93:2, 93:4, 94:3, 94:6, 94:15, 95:28, 95:29, 119:28, 123:6, 124:17, 133:10, 133:26, 136:4, 137:2, 137:13, 146:2, 154:3, 168:19, 170:22, 172:10, 176:18, 178:17, 179:6, 179:9, 189:19, 193:12, 193:17, 193:18, 194:4 information' [1] - 194:5 informed [10] - 50:16, 67:24, 150:17, 150:23, 177:28, 192:9, 192:10, 192:14, 192:19, 192:28 initial [3] - 82:19, 121:14, 122:1 initiated [1] - 81:14 INM [1] - 68:3 input [3] - 136:2, 160:19, 172:8 inquire [1] - 60:8 inquired [2] - 7:20, 56:18 inquiries [3] - 69:1, 136:3, 172:9 inquiry [13] - 39:29, 99:5, 120:21, 131:12, 142:14, 143:3, 148:25, 153:21, 170:22, 192:7, 192:21, 192:26, 193:1 INQUIRY [2] - 1:3, 1:9 insisted [1] - 167:2 insistence [2] - 16:16, 188:16 insistent [2] - 13:22, 13:23 insisting [1] - 143:6 insofar [2] - 47:1, 128:27 inspector [1] - 79:1 Inspectorate [5] - 120:4, 131:20, 137:7, 138:19, 165:26 inspectorate [1] - 120:18</p>
---	--	--	---	--

<p>instance [2] - 177:27, 190:29</p> <p>instances [1] - 145:15</p> <p>instead [1] - 69:3</p> <p>instructed [4] - 53:2, 69:18, 116:13, 120:1</p> <p>INSTRUCTED [11] - 2:11, 2:17, 2:23, 2:28, 3:2, 3:6, 3:17, 4:7, 4:10, 4:14, 4:20</p> <p>instruction [8] - 44:9, 45:1, 45:8, 45:10, 46:9, 68:17, 71:8, 108:4</p> <p>instructions [11] - 8:5, 9:10, 11:4, 13:5, 23:3, 49:10, 57:29, 58:29, 64:19, 72:6, 171:29</p> <p>INSTRUMENT [1] - 1:8</p> <p>instrumental [1] - 119:18</p> <p>intelligence [3] - 24:3, 24:5, 24:14</p> <p>intemperate [1] - 47:12</p> <p>intend [1] - 55:3</p> <p>intended [3] - 49:16, 154:24, 157:7</p> <p>intention [3] - 44:10, 137:21, 137:23</p> <p>intents [1] - 189:5</p> <p>interaction [1] - 61:24</p> <p>interactions [3] - 50:17, 52:6, 188:5</p> <p>interest [3] - 16:8, 85:11, 166:24</p> <p>interested [5] - 65:29, 66:1, 163:5, 180:22, 181:26</p> <p>interesting [1] - 196:21</p> <p>interests [1] - 48:14</p> <p>interim [4] - 66:20, 121:11, 122:20, 129:9</p> <p>internal [1] - 46:4</p> <p>interrupt [1] - 174:16</p> <p>interrupting [1] - 63:25</p> <p>interval [1] - 26:2</p> <p>intervention [1] - 11:24</p> <p>interview [13] - 7:18, 31:8, 50:22, 50:27, 57:24, 58:5, 80:13, 81:3, 139:22, 139:27, 141:16, 194:24,</p>	<p>195:22</p> <p>interviewed [8] - 59:5, 101:7, 129:23, 130:5, 137:5, 143:9, 169:1, 192:7</p> <p>interviewing [1] - 195:25</p> <p>INTO [1] - 1:3</p> <p>introduced [4] - 59:11, 155:19, 165:20, 192:2</p> <p>introduction [1] - 165:9</p> <p>investigate [1] - 100:25</p> <p>investigated [12] - 14:2, 14:11, 14:18, 108:8, 113:12, 144:18, 152:25, 153:29, 179:17, 182:23, 183:16</p> <p>investigating [6] - 100:2, 100:28, 105:27, 111:17, 112:7, 196:8</p> <p>investigation [79] - 8:6, 14:25, 15:3, 15:15, 15:16, 16:5, 16:25, 18:19, 18:25, 19:10, 19:28, 19:29, 20:13, 20:14, 46:7, 87:6, 89:6, 91:18, 91:25, 93:14, 94:22, 99:26, 100:14, 101:3, 101:18, 105:25, 106:5, 106:24, 107:18, 108:24, 111:10, 111:19, 111:29, 113:21, 115:13, 119:7, 121:2, 122:22, 123:7, 124:12, 124:16, 124:18, 126:5, 129:4, 129:24, 130:24, 132:29, 136:1, 136:5, 136:28, 137:6, 137:12, 137:16, 139:20, 140:2, 143:3, 149:3, 153:6, 153:10, 154:5, 155:28, 157:18, 158:15, 170:14, 170:20, 171:10, 171:16, 172:7, 172:11, 179:20, 182:6, 183:7, 183:12, 183:20, 190:15, 191:14, 195:12, 195:20</p> <p>investigations [4] - 111:18, 112:22,</p>	<p>113:24, 137:19</p> <p>investigators [6] - 31:9, 48:16, 73:29, 107:28, 111:12, 130:10</p> <p>invitation [6] - 64:25, 130:16, 131:26, 132:8, 132:9, 174:11</p> <p>invited [5] - 61:4, 143:12, 173:24, 174:1, 174:3</p> <p>inviting [2] - 55:27, 64:18</p> <p>involved [11] - 20:24, 46:6, 55:5, 61:15, 119:16, 162:12, 164:12, 180:7, 180:9, 196:6, 196:20</p> <p>involving [3] - 34:7, 161:11, 175:18</p> <p>IRELAND [1] - 3:18</p> <p>IRISH [3] - 3:25, 4:1, 4:2</p> <p>Irish [4] - 48:6, 61:24, 65:28, 69:14</p> <p>irrespective [1] - 187:26</p> <p>issue [109] - 14:5, 19:28, 45:4, 46:23, 50:2, 54:21, 55:15, 55:25, 57:11, 58:26, 59:11, 61:20, 64:11, 65:8, 85:14, 85:20, 89:5, 94:5, 95:11, 103:8, 104:26, 105:29, 117:16, 117:26, 118:2, 118:13, 119:17, 121:26, 122:24, 125:12, 125:17, 126:3, 126:12, 126:19, 127:4, 127:7, 127:14, 128:7, 130:18, 131:21, 131:29, 132:16, 132:24, 133:22, 133:29, 134:13, 134:26, 135:4, 135:7, 135:15, 136:18, 136:25, 136:26, 138:11, 139:15, 142:9, 143:4, 143:7, 143:18, 144:7, 144:8, 144:10, 144:11, 144:29, 145:11, 147:5, 148:1, 148:7, 148:21, 149:2, 149:14, 149:17, 149:19, 149:21, 150:13, 153:16,</p>	<p>154:22, 154:28, 156:11, 156:24, 157:27, 159:12, 159:19, 160:15, 160:26, 160:28, 160:29, 161:4, 161:10, 161:24, 161:27, 162:1, 162:23, 165:27, 167:8, 168:2, 168:27, 175:11, 175:17, 176:21, 181:6, 183:18, 185:15, 186:3, 190:27, 196:9, 196:22, 196:25</p> <p>issued [12] - 68:19, 131:15, 135:19, 135:21, 170:19, 171:2, 172:2, 173:5, 173:12, 174:4, 188:8, 188:11</p> <p>issues [59] - 14:21, 46:20, 46:21, 46:22, 85:11, 116:29, 117:3, 117:6, 117:7, 117:10, 117:18, 118:2, 118:19, 118:25, 118:26, 121:15, 122:19, 128:11, 128:27, 131:7, 132:10, 134:7, 135:11, 141:4, 142:20, 142:23, 142:25, 143:16, 144:2, 144:5, 146:21, 146:24, 147:29, 148:20, 153:28, 156:22, 157:11, 160:20, 164:4, 165:13, 167:21, 167:23, 168:18, 174:11, 179:29, 180:3, 180:9, 180:16, 180:25, 182:3, 182:22, 183:1, 183:29, 185:10, 186:22, 188:13, 195:28</p> <p>it' [1] - 194:4</p> <p>itself [3] - 34:19, 53:5, 159:12</p>	<p>139:10, 140:9, 140:26, 140:28, 148:5, 153:27, 168:15, 196:23</p> <p>JERMYN [1] - 3:29</p> <p>job [19] - 7:22, 8:1, 68:13, 82:11, 82:22, 101:27, 102:17, 102:21, 109:7, 109:9, 110:24, 110:25, 111:21, 111:23, 131:7, 131:13, 156:21, 156:28</p> <p>jobs [1] - 109:8</p> <p>Joe [7] - 25:21, 26:12, 26:13, 26:23, 52:6, 160:19, 163:13</p> <p>John [16] - 28:16, 30:29, 31:23, 31:27, 32:10, 32:25, 34:6, 34:26, 34:27, 37:7, 37:14, 40:5, 44:27, 46:7, 68:7, 119:19</p> <p>JOHN [5] - 2:17, 2:23, 3:5, 4:10, 4:14</p> <p>joking [1] - 37:9</p> <p>jotted [1] - 181:13</p> <p>journalist [21] - 22:17, 26:17, 49:9, 51:2, 57:5, 67:6, 67:28, 72:20, 72:29, 88:2, 88:16, 88:20, 88:22, 89:25, 89:27, 90:6, 90:8, 91:6, 91:10, 149:26</p> <p>journalist's [1] - 63:16</p> <p>journalistic [6] - 48:21, 61:20, 62:1, 62:11, 65:23, 67:27</p> <p>journalists [30] - 23:18, 42:24, 44:3, 50:18, 51:11, 60:2, 62:25, 72:6, 72:13, 72:17, 72:23, 73:7, 73:8, 73:10, 73:11, 74:6, 78:8, 92:3, 93:27, 96:1, 97:18, 97:23, 98:8, 98:12, 98:15, 98:29, 99:1, 99:11, 101:5, 111:15</p> <p>judge [6] - 123:24, 156:21, 158:14, 158:25, 160:9, 162:28</p> <p>Judge [3] - 20:14, 58:15, 197:2</p> <p>JUDGE [2] - 1:12, 2:3</p> <p>judgment [1] - 183:23</p>
J				
<p>Jack [1] - 86:3</p> <p>Jane [3] - 152:3, 177:8, 181:12</p> <p>January [15] - 27:4, 27:11, 27:12, 30:8, 87:25, 132:13, 139:2,</p>				

<p>Judy [1] - 162:28 July [6] - 21:8, 22:5, 22:7, 26:7, 26:8, 125:15 July/August [1] - 25:23 June [17] - 6:16, 9:25, 10:23, 21:8, 22:5, 22:7, 26:7, 26:8, 79:29, 125:28, 150:19, 178:26, 178:27, 186:18, 187:2, 187:3, 187:4 junior [1] - 57:14 JUNO [1] - 3:26 jury [1] - 59:23 justice [6] - 114:23, 118:27, 119:5, 139:29, 163:21, 164:29 Justice [21] - 56:12, 116:25, 118:4, 118:17, 124:3, 125:1, 132:19, 144:3, 146:3, 148:17, 151:13, 154:2, 157:2, 165:3, 165:14, 167:20, 170:3, 180:6, 182:1, 194:29, 195:9 JUSTICE [3] - 1:8, 1:12, 2:2 justify [2] - 140:22, 141:18</p>	<p>53:4 KENNEDY [1] - 3:1 kept [5] - 15:5, 114:20, 134:19, 157:6, 181:24 Kevin [2] - 118:27, 119:5 KEVIN'S [2] - 3:8, 3:13 kiddie [17] - 27:29, 28:1, 29:17, 30:5, 30:18, 33:21, 33:25, 35:9, 36:1, 36:5, 37:22, 37:26, 38:2, 39:19, 39:22, 39:26, 40:25 kids [2] - 35:29, 36:2 KIERAN [2] - 3:6, 3:11 kind [7] - 29:19, 63:17, 75:9, 75:28, 109:24, 111:16, 115:28 knackers [1] - 34:28 knock [1] - 106:28 knowing [3] - 82:14, 103:13, 141:9 knowledge [14] - 17:19, 22:3, 41:26, 133:8, 138:21, 139:5, 140:24, 150:3, 150:4, 167:25, 168:9, 189:13, 193:22, 195:4 known [11] - 16:4, 97:23, 115:5, 117:20, 139:19, 140:7, 150:24, 176:14, 176:15, 187:23, 187:27 knows [1] - 14:16 knuckle [1] - 12:14 KRW [1] - 4:15</p>	<p>36:16, 36:20, 36:23, 37:12, 38:15, 47:12, 173:18 large [1] - 187:28 last [10] - 9:10, 70:28, 71:26, 104:9, 104:10, 115:7, 124:8, 158:20, 180:16, 186:2 lasted [2] - 81:27, 152:5 latitude [1] - 157:5 latter [1] - 98:24 Latvian [1] - 59:23 LAVERY [1] - 4:3 law [4] - 63:4, 63:15, 145:13, 180:12 Law [1] - 180:6 LAW [2] - 2:28, 4:15 LAWLOR [1] - 4:10 lawyer [2] - 147:7, 184:18 leader [6] - 14:6, 157:24, 176:4, 188:17, 188:19, 191:13 LEADER [15] - 2:7, 5:13, 5:17, 116:10, 116:19, 116:20, 119:16, 156:16, 174:16, 174:22, 177:20, 194:9, 194:16, 194:18, 196:29 Leader [2] - 174:20, 174:21 leadership [1] - 80:5 leading [1] - 174:26 league [1] - 38:26 leak [2] - 43:26, 44:9 leaking [5] - 7:21, 14:3, 14:11, 14:19, 101:4 leaks [1] - 7:25 learned [8] - 67:6, 132:1, 138:19, 150:5, 169:16, 169:23, 172:11, 188:20 learning [1] - 81:7 least [12] - 96:7, 96:17, 139:22, 140:9, 141:29, 155:10, 163:8, 166:21, 168:15, 175:8, 178:2, 184:1 leave [4] - 19:25, 41:27, 119:12, 171:7 leaving [2] - 60:7, 114:14 led [4] - 91:10, 106:1, 130:20, 135:11</p>	<p>left [8] - 33:10, 48:3, 49:17, 79:29, 103:28, 112:13, 163:19 legal [8] - 60:5, 62:26, 63:9, 68:21, 142:16, 145:2, 157:19 legally [1] - 63:12 legible [1] - 177:12 legislation [1] - 182:4 legislator [1] - 180:9 Lehane [3] - 152:3, 177:8, 181:12 LEHANE [1] - 4:10 Leinster [3] - 148:9, 149:21, 181:24 length [1] - 29:2 Leo [2] - 125:27, 163:1 less [3] - 65:21, 111:4, 122:9 lest [3] - 187:20, 191:16, 193:29 letter [37] - 43:27, 44:1, 44:7, 44:14, 56:10, 56:11, 68:17, 68:19, 103:9, 103:15, 120:24, 122:7, 122:8, 122:18, 122:29, 123:11, 123:12, 123:17, 123:18, 123:21, 124:6, 124:8, 124:26, 124:27, 124:29, 125:27, 135:1, 142:6, 157:12, 157:16, 158:8, 158:13, 158:17, 158:20, 167:3, 167:10, 196:10 letters [7] - 98:22, 118:1, 131:12, 142:26, 144:6, 166:29, 185:15 level [7] - 67:26, 86:21, 103:5, 153:4, 155:24, 195:6 library [1] - 155:5 licence [1] - 187:29 lies [2] - 42:21, 42:24 life [3] - 167:7, 179:27, 179:28 light [9] - 22:21, 49:4, 65:25, 104:15, 163:18, 164:4, 166:23, 189:11, 194:5 likeable [2] - 114:27, 114:28 likely [7] - 84:6, 84:28, 85:6, 85:9, 85:12, 87:7, 178:20</p>	<p>limited [1] - 151:27 LIMITED [3] - 3:16, 3:20, 3:21 line [10] - 14:8, 50:25, 50:26, 51:12, 75:13, 76:21, 78:1, 78:13, 84:19 lines [3] - 12:14, 13:7, 144:3 link [3] - 19:17, 19:27, 20:7 linked [3] - 103:7, 168:18, 175:26 list [14] - 44:24, 72:23, 72:24, 72:27, 72:28, 73:12, 73:23, 99:2, 99:12, 99:16, 99:17, 134:7, 192:8, 192:22 listen [5] - 12:14, 38:20, 42:25, 156:21, 163:4 listened [1] - 183:25 listening [2] - 34:22, 35:10 LITTLE [1] - 2:19 live [2] - 112:19, 112:26 lives [1] - 127:24 living [2] - 112:21, 165:4 load [1] - 42:20 lobbying [1] - 180:12 logic [1] - 131:17 Look [1] - 190:28 look [28] - 17:21, 30:29, 53:23, 58:27, 66:21, 80:15, 81:9, 84:11, 85:8, 86:22, 88:12, 88:15, 89:8, 89:18, 92:17, 108:27, 109:4, 110:4, 114:4, 125:29, 136:19, 144:3, 159:17, 162:28, 177:15, 180:14, 185:27, 188:26 looked [3] - 108:16, 137:2, 182:7 looking [8] - 9:14, 21:3, 96:5, 144:29, 157:19, 172:22, 177:21, 181:1 looks [2] - 57:18, 180:15 loop [1] - 114:14 Lord [1] - 11:10 Lordship [1] - 44:16 lost [5] - 9:1, 83:22, 127:24, 134:17, 165:5</p>
K				
<p>KATHLEEN [1] - 2:7 Kavanagh [1] - 82:9 KAVANAGH [1] - 2:4 Keane [1] - 60:17 KEELEY [20] - 3:17, 60:20, 60:24, 60:28, 61:7, 61:10, 61:22, 62:5, 62:14, 62:18, 62:22, 63:6, 63:8, 63:21, 63:27, 64:4, 64:26, 65:18, 66:3, 66:6 Keeley [6] - 60:14, 60:16, 60:18, 61:11, 62:13, 65:9 keen [1] - 32:5 keep [2] - 12:9, 191:7 keeping [3] - 11:1, 155:7, 164:10 Keith [1] - 47:24 KELLY [4] - 3:6, 3:6, 3:11, 3:11 Kennedy [2] - 52:6,</p>				
	L			
	<p>Labour [1] - 180:6 lack [1] - 131:9 lacking [2] - 41:5, 131:17 lady [3] - 96:11, 152:10, 179:5 laid [1] - 18:19 Lally [5] - 48:6, 48:16, 48:20, 49:8, 49:9 LALLY [1] - 4:2 land [1] - 35:13 landline [1] - 88:8 language [8] - 35:5,</p>			

<p>loth [1] - 70:23 loved [1] - 134:17 low [2] - 52:20 LOWER [2] - 3:7, 3:12 luck [1] - 160:8 ludicrous [1] - 191:4 lunch [2] - 148:18, 149:12 LUNCH [2] - 116:5, 116:8 lunchtime [1] - 107:8 lying [1] - 55:6</p>	<p>141:3, 144:23, 153:5, 156:12, 162:24, 183:9, 183:20, 185:25, 185:27, 196:24 March [18] - 13:24, 28:17, 31:9, 31:10, 58:2, 72:23, 73:6, 80:18, 102:29, 116:25, 120:8, 125:9, 125:10, 136:16, 139:1, 158:20, 191:20, 191:21 Mark [1] - 171:22 marked [1] - 109:10 MARRINAN [1] - 2:6 Martin [36] - 6:9, 7:20, 8:22, 9:14, 9:25, 11:13, 12:19, 27:26, 30:27, 32:10, 32:16, 33:19, 35:12, 37:6, 39:9, 40:26, 43:3, 44:25, 47:4, 50:16, 70:12, 70:17, 107:12, 115:27, 139:4, 145:9, 145:29, 150:9, 151:17, 154:11, 154:16, 154:17, 156:1, 175:21, 184:9 Martin' [1] - 10:18 Master's [1] - 26:28 material [18] - 28:26, 85:2, 86:20, 101:5, 116:22, 128:19, 129:3, 135:2, 135:8, 136:12, 164:28, 173:20, 174:10, 175:11, 189:17, 193:17, 193:18 materials [12] - 31:7, 116:21, 120:26, 120:27, 123:14, 124:9, 126:23, 126:25, 127:3, 132:17, 132:26, 136:20 matter [55] - 8:7, 8:13, 16:23, 31:3, 39:29, 40:8, 44:3, 44:18, 46:24, 46:25, 48:7, 49:26, 51:5, 55:18, 55:19, 56:25, 57:10, 57:14, 58:22, 67:29, 69:1, 69:8, 71:16, 75:29, 91:12, 94:23, 96:8, 96:22, 101:1, 103:17, 104:25, 111:5, 111:6, 115:7, 119:18, 119:26, 120:4,</p>	<p>122:12, 125:4, 126:29, 136:24, 137:3, 137:9, 137:11, 137:26, 144:23, 147:6, 155:27, 163:13, 164:5, 165:9, 165:25, 182:26, 183:26, 184:3 matters [30] - 8:20, 13:27, 15:1, 15:29, 16:16, 17:24, 43:20, 43:23, 44:23, 46:25, 54:13, 71:24, 77:15, 78:20, 104:20, 108:13, 111:11, 112:9, 114:1, 118:26, 119:1, 123:28, 125:4, 139:18, 140:24, 157:6, 166:23, 168:24, 194:18, 195:18 MATTERS [1] - 1:5 Maurice [37] - 15:12, 20:24, 22:9, 22:11, 23:12, 26:19, 40:14, 42:18, 59:5, 59:7, 76:25, 76:27, 78:4, 78:5, 78:8, 78:10, 78:14, 78:17, 107:19, 108:22, 115:28, 144:5, 166:6, 166:21, 166:26, 168:6, 170:26, 172:19, 172:23, 172:26, 173:2, 174:29, 175:18, 175:29, 176:8, 182:13, 193:16 MAY [3] - 1:18, 6:1, 197:6 Mayor [1] - 11:10 McAleese [9] - 3:21, 3:21, 60:19, 60:22, 60:23, 60:25, 60:27, 66:7, 66:11 McAleese's [1] - 71:25 McCabe [189] - 2:9, 15:12, 15:20, 15:28, 17:11, 18:8, 20:25, 22:9, 22:11, 22:18, 23:12, 24:25, 26:14, 26:19, 26:23, 27:27, 27:29, 29:5, 30:15, 33:25, 36:5, 38:13, 38:28, 40:14, 41:17, 42:18, 42:20, 44:29, 45:1, 45:12, 45:18, 45:20, 45:25, 46:6, 46:13, 46:20, 46:23, 48:28, 49:4, 53:1,</p>	<p>53:10, 53:11, 53:18, 53:25, 54:3, 54:14, 54:24, 55:2, 55:6, 59:5, 59:8, 70:8, 72:8, 76:9, 76:12, 78:17, 84:25, 85:14, 85:16, 85:17, 107:19, 108:23, 109:1, 115:28, 117:1, 117:17, 117:19, 118:3, 118:6, 118:12, 118:13, 119:21, 119:24, 120:23, 121:22, 122:9, 122:17, 122:21, 123:1, 123:6, 123:15, 123:19, 123:23, 124:1, 126:4, 126:9, 128:2, 128:6, 128:22, 129:10, 130:1, 130:15, 131:22, 132:3, 134:3, 135:15, 135:27, 136:17, 137:5, 138:2, 138:18, 138:22, 138:26, 139:12, 140:5, 140:13, 141:10, 141:23, 142:2, 142:16, 142:18, 142:21, 143:6, 144:5, 144:18, 144:22, 144:25, 146:18, 147:7, 148:1, 148:10, 148:21, 148:29, 151:8, 152:17, 152:29, 154:7, 154:15, 156:29, 157:8, 157:17, 159:4, 163:2, 166:6, 166:21, 166:26, 166:28, 167:11, 167:18, 167:22, 168:6, 168:16, 168:20, 168:24, 169:8, 169:11, 169:23, 169:29, 170:9, 170:26, 172:20, 172:23, 172:26, 173:2, 173:6, 173:12, 173:22, 174:29, 175:18, 175:29, 176:8, 176:22, 179:10, 180:29, 182:13, 182:17, 185:2, 185:11, 185:26, 186:6, 188:16, 188:18, 188:22, 189:6, 189:15, 191:13, 191:26, 192:2, 192:6, 192:28, 193:3,</p>	<p>193:16, 193:26, 194:21, 196:8, 196:15 McCabe's [12] - 23:27, 47:17, 47:22, 117:27, 120:1, 122:29, 138:24, 142:26, 154:12, 157:18, 164:25, 187:23 McCann [12] - 3:16, 50:11, 51:16, 60:6, 61:8, 61:10, 61:15, 61:26, 61:28, 73:27, 83:1, 87:9 McCann's [1] - 62:7 McCONNELL [1] - 3:26 McCOURT [1] - 4:7 McDOWELL [2] - 2:9, 81:27 McENROE [1] - 3:26 McENROY [1] - 4:6 McGARRY [1] - 2:10 McGowan [1] - 100:20 McGuinness [70] - 4:10, 27:9, 27:10, 27:19, 27:29, 28:17, 28:19, 29:1, 29:10, 30:4, 30:24, 31:8, 31:14, 32:10, 32:14, 32:24, 33:2, 33:15, 33:25, 33:27, 34:28, 36:4, 37:4, 37:7, 39:27, 40:6, 41:17, 49:22, 50:10, 50:15, 50:21, 50:26, 51:3, 57:12, 58:18, 59:11, 59:28, 60:1, 60:14, 60:16, 60:18, 60:22, 66:8, 66:14, 66:16, 66:20, 69:24, 71:20, 71:23, 81:4, 81:12, 81:13, 81:28, 82:1, 82:3, 83:9, 84:9, 87:15, 87:22, 94:10, 97:3, 97:11, 99:24, 102:5, 106:10, 109:29, 150:1, 150:6, 157:26, 158:4 MCGUINNESS [3] - 2:6, 2:16, 5:9 McGuinness' [5] - 30:29, 32:15, 32:23, 37:1, 40:20 McLindon [11] - 32:20, 33:11, 39:7, 43:4, 51:27, 52:1, 86:1, 86:2, 107:12, 114:3, 115:23</p>
M				
<p>M.E [1] - 2:24 machine [1] - 27:4 MACKIN [1] - 4:14 mad [1] - 38:12 MADE [2] - 1:3, 1:8 mail [4] - 169:24, 169:27, 169:28, 169:29 mailing [1] - 99:17 main [3] - 14:5, 140:27, 186:19 maintain [3] - 13:19, 93:3, 123:9 maintained [4] - 93:3, 126:1, 168:25, 172:25 maintaining [1] - 16:29 maintenance [1] - 190:20 major [1] - 145:11 majority [1] - 145:20 maladministration [1] - 162:3 malicious [1] - 185:29 MALONE [1] - 1:30 Malone [1] - 1:25 malpractice [2] - 190:3, 190:15 man [5] - 30:13, 33:13, 33:23, 47:11, 185:27 man' [1] - 30:14 managed [1] - 179:29 management [3] - 67:24, 68:2, 85:22 Managing [2] - 68:5, 68:11 managing [1] - 68:12 manner [13] - 105:12, 113:13,</p>	<p>141:3, 144:23, 153:5, 156:12, 162:24, 183:9, 183:20, 185:25, 185:27, 196:24 March [18] - 13:24, 28:17, 31:9, 31:10, 58:2, 72:23, 73:6, 80:18, 102:29, 116:25, 120:8, 125:9, 125:10, 136:16, 139:1, 158:20, 191:20, 191:21 Mark [1] - 171:22 marked [1] - 109:10 MARRINAN [1] - 2:6 Martin [36] - 6:9, 7:20, 8:22, 9:14, 9:25, 11:13, 12:19, 27:26, 30:27, 32:10, 32:16, 33:19, 35:12, 37:6, 39:9, 40:26, 43:3, 44:25, 47:4, 50:16, 70:12, 70:17, 107:12, 115:27, 139:4, 145:9, 145:29, 150:9, 151:17, 154:11, 154:16, 154:17, 156:1, 175:21, 184:9 Martin' [1] - 10:18 Master's [1] - 26:28 material [18] - 28:26, 85:2, 86:20, 101:5, 116:22, 128:19, 129:3, 135:2, 135:8, 136:12, 164:28, 173:20, 174:10, 175:11, 189:17, 193:17, 193:18 materials [12] - 31:7, 116:21, 120:26, 120:27, 123:14, 124:9, 126:23, 126:25, 127:3, 132:17, 132:26, 136:20 matter [55] - 8:7, 8:13, 16:23, 31:3, 39:29, 40:8, 44:3, 44:18, 46:24, 46:25, 48:7, 49:26, 51:5, 55:18, 55:19, 56:25, 57:10, 57:14, 58:22, 67:29, 69:1, 69:8, 71:16, 75:29, 91:12, 94:23, 96:8, 96:22, 101:1, 103:17, 104:25, 111:5, 111:6, 115:7, 119:18, 119:26, 120:4,</p>	<p>122:12, 125:4, 126:29, 136:24, 137:3, 137:9, 137:11, 137:26, 144:23, 147:6, 155:27, 163:13, 164:5, 165:9, 165:25, 182:26, 183:26, 184:3 matters [30] - 8:20, 13:27, 15:1, 15:29, 16:16, 17:24, 43:20, 43:23, 44:23, 46:25, 54:13, 71:24, 77:15, 78:20, 104:20, 108:13, 111:11, 112:9, 114:1, 118:26, 119:1, 123:28, 125:4, 139:18, 140:24, 157:6, 166:23, 168:24, 194:18, 195:18 MATTERS [1] - 1:5 Maurice [37] - 15:12, 20:24, 22:9, 22:11, 23:12, 26:19, 40:14, 42:18, 59:5, 59:7, 76:25, 76:27, 78:4, 78:5, 78:8, 78:10, 78:14, 78:17, 107:19, 108:22, 115:28, 144:5, 166:6, 166:21, 166:26, 168:6, 170:26, 172:19, 172:23, 172:26, 173:2, 174:29, 175:18, 175:29, 176:8, 182:13, 193:16 MAY [3] - 1:18, 6:1, 197:6 Mayor [1] - 11:10 McAleese [9] - 3:21, 3:21, 60:19, 60:22, 60:23, 60:25, 60:27, 66:7, 66:11 McAleese's [1] - 71:25 McCabe [189] - 2:9, 15:12, 15:20, 15:28, 17:11, 18:8, 20:25, 22:9, 22:11, 22:18, 23:12, 24:25, 26:14, 26:19, 26:23, 27:27, 27:29, 29:5, 30:15, 33:25, 36:5, 38:13, 38:28, 40:14, 41:17, 42:18, 42:20, 44:29, 45:1, 45:12, 45:18, 45:20, 45:25, 46:6, 46:13, 46:20, 46:23, 48:28, 49:4, 53:1,</p>	<p>53:10, 53:11, 53:18, 53:25, 54:3, 54:14, 54:24, 55:2, 55:6, 59:5, 59:8, 70:8, 72:8, 76:9, 76:12, 78:17, 84:25, 85:14, 85:16, 85:17, 107:19, 108:23, 109:1, 115:28, 117:1, 117:17, 117:19, 118:3, 118:6, 118:12, 118:13, 119:21, 119:24, 120:23, 121:22, 122:9, 122:17, 122:21, 123:1, 123:6, 123:15, 123:19, 123:23, 124:1, 126:4, 126:9, 128:2, 128:6, 128:22, 129:10, 130:1, 130:15, 131:22, 132:3, 134:3, 135:15, 135:27, 136:17, 137:5, 138:2, 138:18, 138:22, 138:26, 139:12, 140:5, 140:13, 141:10, 141:23, 142:2, 142:16, 142:18, 142:21, 143:6, 144:5, 144:18, 144:22, 144:25, 146:18, 147:7, 148:1, 148:10, 148:21, 148:29, 151:8, 152:17, 152:29, 154:7, 154:15, 156:29, 157:8, 157:17, 159:4, 163:2, 166:6, 166:21, 166:26, 166:28, 167:11, 167:18, 167:22, 168:6, 168:16, 168:20, 168:24, 169:8, 169:11, 169:23, 169:29, 170:9, 170:26, 172:20, 172:23, 172:26, 173:2, 173:6, 173:12, 173:22, 174:29, 175:18, 175:29, 176:8, 176:22, 179:10, 180:29, 182:13, 182:17, 185:2, 185:11, 185:26, 186:6, 188:16, 188:18, 188:22, 189:6, 189:15, 191:13, 191:26, 192:2, 192:6, 192:28, 193:3,</p>	<p>193:16, 193:26, 194:21, 196:8, 196:15 McCabe's [12] - 23:27, 47:17, 47:22, 117:27, 120:1, 122:29, 138:24, 142:26, 154:12, 157:18, 164:25, 187:23 McCann [12] - 3:16, 50:11, 51:16, 60:6, 61:8, 61:10, 61:15, 61:26, 61:28, 73:27, 83:1, 87:9 McCann's [1] - 62:7 McCONNELL [1] - 3:26 McCOURT [1] - 4:7 McDOWELL [2] - 2:9, 81:27 McENROE [1] - 3:26 McENROY [1] - 4:6 McGARRY [1] - 2:10 McGowan [1] - 100:20 McGuinness [70] - 4:10, 27:9, 27:10, 27:19, 27:29, 28:17, 28:19, 29:1, 29:10, 30:4, 30:24, 31:8, 31:14, 32:10, 32:14, 32:24, 33:2, 33:15, 33:25, 33:27, 34:28, 36:4, 37:4, 37:7, 39:27, 40:6, 41:17, 49:22, 50:10, 50:15, 50:21, 50:26, 51:3, 57:12, 58:18, 59:11, 59:28, 60:1, 60:14, 60:16, 60:18, 60:22, 66:8, 66:14, 66:16, 66:20, 69:24, 71:20, 71:23, 81:4, 81:12, 81:13, 81:28, 82:1, 82:3, 83:9, 84:9, 87:15, 87:22, 94:10, 97:3, 97:11, 99:24, 102:5, 106:10, 109:29, 150:1, 150:6, 157:26, 158:4 MCGUINNESS [3] - 2:6, 2:16, 5:9 McGuinness' [5] - 30:29, 32:15, 32:23, 37:1, 40:20 McLindon [11] - 32:20, 33:11, 39:7, 43:4, 51:27, 52:1, 86:1, 86:2, 107:12, 114:3, 115:23</p>

<p>McLindon's [1] - 43:5</p> <p>McLoughlin [2] - 160:15, 161:28</p> <p>mean [39] - 15:26, 16:23, 20:15, 23:11, 39:24, 44:17, 66:15, 91:15, 96:9, 96:10, 102:18, 102:26, 102:27, 104:27, 105:14, 109:2, 110:13, 110:26, 112:9, 112:10, 112:15, 113:14, 113:22, 113:23, 113:25, 130:29, 144:24, 147:13, 148:14, 162:24, 168:1, 175:19, 182:8, 182:23, 184:18, 185:20, 186:17, 191:3</p> <p>meaning [1] - 174:25</p> <p>means [1] - 79:17</p> <p>meant [2] - 51:4, 158:12</p> <p>measure [1] - 47:23</p> <p>mechanics [1] - 8:3</p> <p>MEDIA [2] - 3:4, 3:18</p> <p>media [31] - 7:22, 7:25, 38:25, 39:5, 39:20, 44:10, 45:4, 45:11, 48:3, 76:7, 76:8, 76:25, 76:28, 78:5, 78:10, 78:23, 94:5, 94:13, 105:13, 105:15, 106:7, 106:10, 106:11, 108:29, 109:3, 121:25, 156:13, 165:15, 170:10, 183:23</p> <p>Media [3] - 67:25, 68:5, 68:15</p> <p>Meeley [2] - 191:29, 193:5</p> <p>meet [31] - 9:5, 27:10, 27:14, 53:20, 53:22, 54:7, 54:8, 54:9, 54:19, 54:25, 68:6, 130:10, 143:12, 150:11, 150:24, 151:10, 151:12, 151:14, 151:29, 153:12, 171:21, 178:1, 179:6, 179:12, 179:14, 179:23, 180:29, 182:12, 182:15, 182:21, 190:12</p> <p>meeting [73] - 6:21,</p>	<p>15:11, 15:20, 16:10, 16:17, 18:8, 18:18, 19:9, 22:5, 22:18, 22:19, 22:28, 23:5, 23:6, 23:7, 23:11, 23:12, 24:3, 24:16, 26:10, 26:11, 27:3, 27:6, 27:16, 27:23, 27:27, 36:18, 52:23, 53:4, 53:9, 53:13, 53:18, 54:5, 54:18, 54:24, 55:2, 68:8, 68:21, 69:2, 84:14, 87:3, 87:25, 125:13, 125:18, 125:23, 125:29, 126:8, 139:6, 139:7, 139:8, 141:1, 149:13, 149:28, 150:2, 150:5, 151:27, 152:4, 152:5, 152:9, 154:24, 155:19, 156:5, 177:10, 178:6, 179:24, 180:10, 181:7, 181:14, 181:20, 181:21, 181:26, 181:27, 182:10</p> <p>meetings [22] - 6:10, 6:28, 16:11, 21:7, 25:28, 26:4, 27:18, 31:29, 69:18, 84:22, 84:26, 85:16, 85:24, 85:25, 85:28, 86:6, 86:16, 86:25, 87:16, 87:20, 87:22, 152:2</p> <p>member [15] - 48:26, 49:1, 85:10, 136:8, 143:13, 146:5, 146:12, 148:27, 162:22, 163:19, 176:25, 189:19, 192:21, 193:1, 193:11</p> <p>MEMBER [2] - 1:12, 2:2</p> <p>members [11] - 12:10, 35:5, 46:1, 73:20, 85:9, 121:18, 129:2, 148:16, 170:10, 171:1, 176:11</p> <p>memorable [2] - 34:19, 34:20</p> <p>memory [6] - 15:29, 77:10, 134:8, 135:23, 173:10, 173:20</p> <p>mention [7] - 35:23, 35:28, 39:19, 39:22, 108:5, 125:20, 176:26</p> <p>mentioned [13] - 43:10, 44:29, 85:15, 91:20, 121:25,</p>	<p>135:22, 147:10, 147:12, 147:13, 150:8, 150:9, 151:5, 180:27</p> <p>mentioning [1] - 163:1</p> <p>MERCHANTS [1] - 3:23</p> <p>merely [2] - 78:20, 133:5</p> <p>Merrion [5] - 151:29, 152:1, 176:29, 177:2</p> <p>message [2] - 68:2, 130:11</p> <p>messages [2] - 23:26, 82:29</p> <p>met [27] - 17:27, 22:9, 27:8, 27:15, 48:16, 53:25, 55:8, 101:23, 145:5, 150:19, 151:10, 151:17, 151:29, 152:10, 154:16, 155:3, 155:14, 177:2, 179:2, 179:15, 180:2, 180:12, 181:3, 181:6, 181:12, 182:19</p> <p>Metropolitan [2] - 68:28, 69:5</p> <p>Michael [14] - 22:2, 41:18, 61:11, 68:4, 118:5, 122:13, 122:29, 123:20, 129:15, 131:24, 133:18, 134:29, 142:6, 167:10</p> <p>MICHAEL [5] - 2:9, 2:22, 2:28, 3:10, 3:17</p> <p>Michelle [4] - 14:1, 21:5, 25:10, 52:12</p> <p>MICHELLE [1] - 4:6</p> <p>Mick [9] - 16:26, 17:27, 18:6, 18:17, 19:23, 20:5, 22:16, 24:16, 25:18</p> <p>MICK [1] - 3:28</p> <p>microphone [1] - 60:20</p> <p>middle [5] - 51:24, 72:3, 74:11, 165:5, 189:3</p> <p>might [17] - 16:3, 26:16, 60:1, 60:8, 66:16, 69:8, 80:10, 113:23, 114:17, 147:16, 151:7, 154:6, 156:17, 157:20, 159:6, 167:7, 169:5</p> <p>might've [1] - 68:12</p> <p>mildly [1] - 106:2</p>	<p>mind [21] - 11:3, 29:23, 29:24, 34:1, 34:13, 36:14, 49:20, 59:26, 71:11, 96:19, 103:7, 110:4, 133:25, 133:27, 153:15, 156:26, 158:27, 162:27, 178:12, 178:16, 183:4</p> <p>mindful [2] - 189:26, 190:1</p> <p>mine [1] - 12:11</p> <p>Minister [32] - 116:25, 116:28, 117:9, 124:2, 125:14, 125:27, 132:19, 139:24, 139:29, 147:8, 148:16, 149:8, 149:16, 150:18, 151:13, 151:23, 153:8, 154:2, 156:28, 163:20, 165:3, 165:14, 167:4, 167:20, 178:25, 182:1, 190:11, 191:21, 192:20, 194:29, 195:9</p> <p>MINISTER [1] - 1:8</p> <p>Ministerial [1] - 149:10</p> <p>Ministers' [1] - 97:4</p> <p>minutes [4] - 81:27, 81:28, 81:29, 89:28</p> <p>mirror [1] - 61:27</p> <p>mirrors [1] - 57:21</p> <p>mischaracterising [1] - 18:12</p> <p>misconduct [1] - 49:3</p> <p>mislead [1] - 137:21</p> <p>misrepresent [1] - 172:2</p> <p>missed [3] - 10:13, 175:2, 191:27</p> <p>misstate [1] - 14:26</p> <p>mistake [1] - 66:22</p> <p>mistaken [3] - 122:3, 134:16, 134:19</p> <p>mistakenly [1] - 58:18</p> <p>mistakes [2] - 17:16, 17:17</p> <p>misunderstand [1] - 112:29</p> <p>misunderstanding [1] - 9:28</p> <p>mix [1] - 44:18</p> <p>mixture [1] - 185:7</p> <p>mobile [3] - 18:24, 88:16, 101:11</p>	<p>modification [1] - 29:26</p> <p>moment [6] - 27:5, 83:26, 110:5, 162:15, 170:6, 177:21</p> <p>moment's [1] - 110:22</p> <p>momentum [1] - 126:1</p> <p>Monaghan [2] - 117:4, 118:25</p> <p>Monday [4] - 67:8, 84:12, 95:14, 166:6</p> <p>monitor [1] - 24:25</p> <p>monitored [1] - 25:1</p> <p>monitors [1] - 25:2</p> <p>month [7] - 23:4, 23:6, 26:1, 26:3, 77:9, 82:19</p> <p>months [6] - 8:23, 39:23, 79:22, 117:29, 170:13</p> <p>mood [1] - 7:5</p> <p>Mooney [8] - 60:6, 60:10, 60:11, 60:12, 60:24, 60:25, 66:9, 66:13</p> <p>Mooney's [1] - 60:29</p> <p>morning [11] - 6:7, 49:16, 56:16, 56:17, 67:8, 82:28, 90:10, 90:19, 91:6, 120:24</p> <p>Moroney [1] - 79:1</p> <p>MORRISSEY [1] - 2:17</p> <p>most [7] - 10:24, 35:12, 37:13, 72:12, 72:14, 84:6, 88:27</p> <p>motivated [2] - 18:20, 107:23</p> <p>motivation [2] - 108:13, 109:3</p> <p>motives [1] - 107:24</p> <p>mount [1] - 151:29</p> <p>Mount [1] - 152:1</p> <p>mounted [1] - 34:29</p> <p>move [9] - 12:18, 22:28, 41:1, 103:8, 103:16, 111:3, 111:8, 113:19, 191:11</p> <p>moved [8] - 103:20, 105:5, 110:21, 115:3, 115:5, 115:12, 185:20</p> <p>moving [3] - 19:20, 87:27, 103:12</p> <p>MR [136] - 1:12, 2:2, 2:4, 2:6, 2:6, 2:9, 2:10, 2:10, 2:14, 2:15, 2:15, 2:16, 2:16, 2:17, 2:22, 2:23, 2:23, 2:27,</p>
--	---	---	---	--

<p>2:28, 3:1, 3:1, 3:5, 3:5, 3:6, 3:10, 3:11, 3:17, 3:21, 3:28, 3:28, 4:2, 4:6, 4:10, 4:14, 4:14, 4:19, 4:20, 5:4, 5:5, 5:7, 5:8, 5:9, 5:12, 5:14, 5:16, 6:5, 6:7, 10:13, 20:27, 21:2, 29:22, 29:29, 37:29, 44:16, 44:22, 48:1, 48:5, 48:12, 48:14, 49:11, 49:14, 49:22, 59:28, 60:1, 60:14, 60:16, 60:18, 60:20, 60:22, 60:24, 60:28, 61:7, 61:10, 61:22, 62:5, 62:14, 62:18, 62:22, 63:6, 63:8, 63:21, 63:27, 64:4, 64:26, 65:18, 66:3, 66:6, 66:8, 66:14, 66:16, 66:20, 67:1, 67:2, 69:20, 69:22, 70:1, 70:3, 70:22, 70:23, 71:2, 71:17, 71:20, 71:23, 81:13, 81:27, 81:28, 82:3, 97:3, 99:24, 106:10, 116:18, 157:7, 157:26, 158:4, 158:25, 158:28, 159:1, 159:2, 160:10, 163:7, 168:1, 168:5, 172:18, 172:22, 174:20, 174:27, 177:23, 180:22, 184:21, 187:6, 187:12, 187:14, 187:15, 191:5, 191:10, 194:8</p> <p>MRS [1] - 4:6</p> <p>MS [46] - 2:7, 2:7, 2:17, 2:18, 2:22, 4:19, 5:6, 5:13, 5:15, 5:17, 49:27, 50:1, 50:6, 50:8, 55:20, 55:25, 55:29, 56:3, 56:5, 57:2, 57:10, 58:15, 58:17, 59:9, 59:19, 59:21, 59:27, 116:10, 116:11, 116:19, 116:20, 119:16, 156:16, 174:16, 174:22, 177:20, 184:24, 184:25, 187:3, 187:5, 187:8, 194:9, 194:12, 194:16, 194:18, 196:29</p> <p>MUIRCHARTAIGH [1] - 2:27</p>	<p>MULLAN [1] - 2:7</p> <p>Mullingar [1] - 171:21</p> <p>multiple [1] - 161:9</p> <p>murder [1] - 97:3</p> <p>murders [1] - 111:12</p> <p>MURPHY [2] - 2:14, 4:19</p> <p>Murphy [1] - 116:12</p> <p>Murray [15] - 50:12, 51:15, 60:7, 66:5, 66:6, 73:27, 81:18, 82:5, 82:27, 83:2, 87:9, 88:23, 88:27, 117:13</p> <p>must [8] - 37:9, 41:29, 87:18, 91:9, 105:22, 109:24, 174:2, 190:12</p> <p>MÍCHEÁL [18] - 2:15, 5:4, 5:8, 6:5, 6:7, 10:13, 20:27, 21:2, 29:22, 29:29, 37:29, 44:16, 44:22, 48:1, 69:22, 70:1, 70:3, 70:22</p> <p>Mícheál [6] - 151:17, 154:10, 154:11, 154:16, 154:17, 156:1</p>	<p>nearly [1] - 81:17</p> <p>necessarily [4] - 153:21, 156:23, 190:13, 196:1</p> <p>necessary [5] - 65:5, 66:23, 162:27, 195:19, 195:23</p> <p>neck [1] - 47:5</p> <p>need [5] - 50:2, 143:2, 152:8, 181:16, 194:11</p> <p>needed [5] - 23:24, 44:4, 45:4, 115:14, 126:1</p> <p>needs [3] - 48:18, 64:9, 64:21</p> <p>negative [2] - 48:27, 78:10</p> <p>negatively [1] - 72:8</p> <p>negativity [1] - 106:2</p> <p>nest [1] - 153:18</p> <p>net [1] - 183:22</p> <p>never [62] - 10:17, 12:17, 17:10, 24:1, 30:28, 36:20, 36:23, 36:27, 36:28, 38:10, 39:25, 40:26, 59:15, 70:21, 77:2, 79:17, 82:13, 83:17, 87:11, 87:16, 87:23, 89:15, 89:17, 92:14, 96:13, 96:19, 102:15, 109:6, 112:8, 114:22, 135:28, 136:3, 137:21, 137:23, 145:29, 146:4, 146:14, 147:10, 147:12, 147:20, 148:1, 149:19, 149:25, 150:8, 150:9, 150:16, 150:17, 153:26, 155:14, 169:17, 171:15, 172:6, 172:9, 181:4, 184:1, 184:16</p> <p>never-ending [1] - 153:26</p> <p>new [6] - 40:20, 79:3, 83:16, 83:18, 105:2, 154:2</p> <p>NEWS [2] - 3:4, 3:20</p> <p>News [3] - 67:25, 68:5, 68:15</p> <p>newspaper [4] - 96:12, 96:14, 134:20, 139:6</p> <p>newspapers [5] - 39:2, 108:17, 112:23, 131:2, 152:29</p> <p>NEWSPAPERS [3] -</p>	<p>3:15, 3:20, 3:20</p> <p>next [7] - 6:21, 116:10, 160:18, 160:19, 162:6, 163:12, 170:18</p> <p>night [9] - 10:28, 39:2, 39:3, 54:23, 54:28, 89:17, 89:23, 90:12, 91:5</p> <p>nine [4] - 56:17, 73:15, 82:27, 134:10</p> <p>nobody [1] - 101:16</p> <p>NOEL [1] - 2:16</p> <p>Nolan's [1] - 86:3</p> <p>non [9] - 120:20, 125:12, 125:17, 127:8, 133:14, 134:12, 135:16, 136:18, 140:20</p> <p>non-cooperation [8] - 120:20, 125:12, 125:17, 127:8, 133:14, 135:16, 136:18, 140:20</p> <p>non-imposition [1] - 134:12</p> <p>none [2] - 79:1, 186:3</p> <p>nonenforcement [1] - 134:12</p> <p>nonetheless [1] - 43:24</p> <p>nonpayment [1] - 127:29</p> <p>normal [2] - 57:5, 90:24</p> <p>normally [2] - 31:17, 179:25</p> <p>NORTHUMBERLA</p> <p>ND [1] - 4:7</p> <p>note [7] - 71:25, 75:4, 137:6, 173:7, 177:11, 193:4</p> <p>noted [5] - 17:3, 74:12, 75:5, 101:25, 166:20</p> <p>notes [24] - 1:27, 16:26, 16:27, 72:5, 75:8, 76:3, 86:1, 86:3, 86:7, 101:24, 177:6, 177:8, 177:10, 181:1, 181:5, 181:7, 181:10, 181:13, 181:15, 181:18, 181:19, 181:20, 181:23, 193:5</p> <p>notetaker [1] - 76:16</p> <p>nothing [23] - 7:23, 7:29, 44:5, 71:3, 93:3, 103:12, 108:20, 109:13, 110:1,</p>	<p>114:18, 119:13, 124:14, 144:6, 146:10, 150:16, 154:18, 156:7, 180:10, 182:9, 182:11, 185:28, 185:29, 186:1</p> <p>notice [6] - 67:19, 80:4, 110:22, 127:25, 138:1, 157:11</p> <p>notices [3] - 121:8, 124:7, 126:21</p> <p>notices" [1] - 124:6</p> <p>notification [1] - 71:5</p> <p>notified [1] - 85:4</p> <p>notwithstanding [1] - 193:14</p> <p>November [5] - 101:8, 121:7, 121:10, 121:16, 167:4</p> <p>number [40] - 7:6, 8:23, 12:1, 13:27, 29:12, 29:16, 39:21, 44:26, 56:9, 56:10, 60:2, 64:28, 68:4, 68:10, 68:22, 71:24, 82:5, 87:20, 89:21, 92:2, 97:17, 98:12, 98:21, 104:12, 113:2, 115:8, 115:11, 117:10, 121:9, 127:23, 128:17, 142:25, 144:1, 146:19, 148:8, 157:11, 161:3, 164:12, 178:24, 196:5</p> <p>numbers [2] - 97:5, 162:11</p> <p>Nóirín [29] - 7:9, 8:14, 8:28, 9:3, 11:29, 13:4, 13:6, 15:12, 15:14, 15:21, 16:2, 16:4, 16:19, 18:20, 19:10, 19:17, 20:5, 20:21, 30:12, 39:7, 42:7, 43:1, 50:16, 51:4, 77:25, 110:7, 110:8, 110:22, 115:27</p>
N				
	<p>name [17] - 23:27, 48:5, 69:15, 98:12, 116:11, 122:26, 123:14, 123:21, 124:24, 134:4, 136:13, 159:3, 176:24, 176:26, 184:26, 187:23, 187:27</p> <p>named [7] - 1:27, 70:12, 96:20, 98:16, 98:17, 121:17, 152:17</p> <p>names [3] - 121:20, 121:21, 123:19</p> <p>naming [1] - 121:6</p> <p>narrative [2] - 142:11, 174:25</p> <p>national [3] - 180:1, 180:9</p> <p>naturally [2] - 118:19, 193:13</p> <p>nature [13] - 65:25, 69:18, 120:12, 128:16, 129:29, 142:22, 144:17, 145:3, 145:4, 149:1, 174:5, 182:6, 196:17</p>	<p>near [1] - 81:17</p> <p>necessarily [4] - 153:21, 156:23, 190:13, 196:1</p> <p>necessary [5] - 65:5, 66:23, 162:27, 195:19, 195:23</p> <p>neck [1] - 47:5</p> <p>need [5] - 50:2, 143:2, 152:8, 181:16, 194:11</p> <p>needed [5] - 23:24, 44:4, 45:4, 115:14, 126:1</p> <p>needs [3] - 48:18, 64:9, 64:21</p> <p>negative [2] - 48:27, 78:10</p> <p>negatively [1] - 72:8</p> <p>negativity [1] - 106:2</p> <p>nest [1] - 153:18</p> <p>net [1] - 183:22</p> <p>never [62] - 10:17, 12:17, 17:10, 24:1, 30:28, 36:20, 36:23, 36:27, 36:28, 38:10, 39:25, 40:26, 59:15, 70:21, 77:2, 79:17, 82:13, 83:17, 87:11, 87:16, 87:23, 89:15, 89:17, 92:14, 96:13, 96:19, 102:15, 109:6, 112:8, 114:22, 135:28, 136:3, 137:21, 137:23, 145:29, 146:4, 146:14, 147:10, 147:12, 147:20, 148:1, 149:19, 149:25, 150:8, 150:9, 150:16, 150:17, 153:26, 155:14, 169:17, 171:15, 172:6, 172:9, 181:4, 184:1, 184:16</p> <p>never-ending [1] - 153:26</p> <p>new [6] - 40:20, 79:3, 83:16, 83:18, 105:2, 154:2</p> <p>NEWS [2] - 3:4, 3:20</p> <p>News [3] - 67:25, 68:5, 68:15</p> <p>newspaper [4] - 96:12, 96:14, 134:20, 139:6</p> <p>newspapers [5] - 39:2, 108:17, 112:23, 131:2, 152:29</p> <p>NEWSPAPERS [3] -</p>	<p>3:15, 3:20, 3:20</p> <p>next [7] - 6:21, 116:10, 160:18, 160:19, 162:6, 163:12, 170:18</p> <p>night [9] - 10:28, 39:2, 39:3, 54:23, 54:28, 89:17, 89:23, 90:12, 91:5</p> <p>nine [4] - 56:17, 73:15, 82:27, 134:10</p> <p>nobody [1] - 101:16</p> <p>NOEL [1] - 2:16</p> <p>Nolan's [1] - 86:3</p> <p>non [9] - 120:20, 125:12, 125:17, 127:8, 133:14, 134:12, 135:16, 136:18, 140:20</p> <p>non-cooperation [8] - 120:20, 125:12, 125:17, 127:8, 133:14, 135:16, 136:18, 140:20</p> <p>non-imposition [1] - 134:12</p> <p>none [2] - 79:1, 186:3</p> <p>nonenforcement [1] - 134:12</p> <p>nonetheless [1] - 43:24</p> <p>nonpayment [1] - 127:29</p> <p>normal [2] - 57:5, 90:24</p> <p>normally [2] - 31:17, 179:25</p> <p>NORTHUMBERLA</p> <p>ND [1] - 4:7</p> <p>note [7] - 71:25, 75:4, 137:6, 173:7, 177:11, 193:4</p> <p>noted [5] - 17:3, 74:12, 75:5, 101:25, 166:20</p> <p>notes [24] - 1:27, 16:26, 16:27, 72:5, 75:8, 76:3, 86:1, 86:3, 86:7, 101:24, 177:6, 177:8, 177:10, 181:1, 181:5, 181:7, 181:10, 181:13, 181:15, 181:18, 181:19, 181:20, 181:23, 193:5</p> <p>notetaker [1] - 76:16</p> <p>nothing [23] - 7:23, 7:29, 44:5, 71:3, 93:3, 103:12, 108:20, 109:13, 110:1,</p>	<p>114:18, 119:13, 124:14, 144:6, 146:10, 150:16, 154:18, 156:7, 180:10, 182:9, 182:11, 185:28, 185:29, 186:1</p> <p>notice [6] - 67:19, 80:4, 110:22, 127:25, 138:1, 157:11</p> <p>notices [3] - 121:8, 124:7, 126:21</p> <p>notices" [1] - 124:6</p> <p>notification [1] - 71:5</p> <p>notified [1] - 85:4</p> <p>notwithstanding [1] - 193:14</p> <p>November [5] - 101:8, 121:7, 121:10, 121:16, 167:4</p> <p>number [40] - 7:6, 8:23, 12:1, 13:27, 29:12, 29:16, 39:21, 44:26, 56:9, 56:10, 60:2, 64:28, 68:4, 68:10, 68:22, 71:24, 82:5, 87:20, 89:21, 92:2, 97:17, 98:12, 98:21, 104:12, 113:2, 115:8, 115:11, 117:10, 121:9, 127:23, 128:17, 142:25, 144:1, 146:19, 148:8, 157:11, 161:3, 164:12, 178:24, 196:5</p> <p>numbers [2] - 97:5, 162:11</p> <p>Nóirín [29] - 7:9, 8:14, 8:28, 9:3, 11:29, 13:4, 13:6, 15:12, 15:14, 15:21, 16:2, 16:4, 16:19, 18:20, 19:10, 19:17, 20:5, 20:21, 30:12, 39:7, 42:7, 43:1, 50:16, 51:4, 77:25, 110:7, 110:8, 110:22, 115:27</p>
N				
				O
				<p>o'clock [2] - 56:17, 197:3</p> <p>O'DOHERTY [1] - 4:14</p> <p>O'Doherty [5] - 67:4, 67:12, 67:19, 70:4, 70:9</p> <p>O'DONNELL [1] -</p>

<p>3:17 O'Higgins [24] - 17:14, 20:26, 29:19, 39:17, 40:12, 44:13, 47:29, 48:2, 70:14, 70:24, 87:28, 87:29, 97:12, 105:9, 118:27, 119:5, 123:24, 123:25, 125:1, 142:24, 150:7, 157:2, 183:26 O'HIGGINS [19] - 2:15, 2:22, 5:4, 5:8, 6:5, 6:7, 10:13, 20:27, 21:2, 29:22, 29:29, 37:29, 44:16, 44:22, 48:1, 69:22, 70:2, 70:3, 70:22 O'KEEFFE [1] - 3:27 O'Mahoney [8] - 119:19, 193:27, 194:2, 194:20, 194:22, 195:2, 195:11, 195:15 O'Mahony [89] - 32:20, 33:10, 44:27, 45:3, 45:7, 45:13, 120:7, 120:17, 120:21, 121:2, 121:12, 122:23, 122:26, 125:5, 125:26, 126:2, 129:10, 129:17, 129:21, 130:8, 130:10, 130:14, 130:18, 130:22, 131:6, 131:26, 131:29, 132:9, 134:14, 134:20, 135:9, 135:29, 136:4, 136:8, 136:12, 137:6, 137:12, 138:22, 138:26, 139:4, 139:9, 139:17, 140:2, 140:11, 141:29, 142:14, 143:13, 143:25, 143:27, 143:29, 157:18, 161:18, 164:15, 164:24, 165:11, 165:20, 167:14, 168:14, 168:29, 169:4, 169:15, 169:18, 169:21, 169:25, 171:10, 171:16, 172:6, 172:10, 172:26, 173:24, 174:2, 174:9, 174:13, 175:19, 175:20, 176:16,</p>	<p>186:15, 186:16, 186:25, 186:27, 187:19, 188:9, 188:11, 188:21, 189:4, 190:23, 191:14, 191:17 O'Mahony's [5] - 46:7, 120:5, 133:3, 188:28, 195:17 O'MARA [1] - 4:7 O'REILLY [1] - 2:27 O'Sullivan [40] - 6:29, 7:9, 8:14, 8:19, 8:28, 9:3, 11:29, 13:4, 13:6, 15:12, 15:21, 16:2, 16:19, 18:20, 19:17, 20:6, 20:21, 30:12, 32:19, 33:10, 39:8, 42:7, 43:2, 43:15, 50:16, 51:5, 51:20, 71:10, 78:6, 98:5, 100:24, 100:27, 103:16, 104:27, 106:1, 106:21, 110:8, 110:9, 110:23, 115:27 O'Sullivan's [6] - 15:14, 16:4, 16:24, 19:10, 77:26, 99:25 O'TOOLE [1] - 3:10 object [1] - 183:22 obligation [2] - 62:10, 63:12 obligations [1] - 61:29 obliged [1] - 49:11 observations [2] - 121:15, 143:1 obtain [1] - 137:13 obtained [3] - 68:4, 88:9, 104:12 obvious [1] - 16:7 obviously [23] - 16:11, 47:21, 53:24, 62:27, 71:10, 73:15, 73:26, 74:19, 75:13, 77:15, 77:18, 81:11, 86:29, 87:5, 88:10, 93:22, 99:25, 102:18, 102:19, 105:12, 105:14, 106:26, 169:3 occasion [8] - 9:24, 11:7, 12:28, 29:4, 47:2, 65:16, 126:5, 161:5 occasions [14] - 11:8, 16:18, 17:28, 53:26, 69:16, 89:21, 95:26, 97:17, 98:22, 146:27, 147:20, 161:3, 161:15, 181:11</p>	<p>occupation [1] - 51:28 occur [1] - 143:26 occurred [15] - 38:19, 40:26, 43:17, 59:2, 121:9, 126:14, 128:13, 143:24, 144:12, 151:12, 151:25, 152:19, 152:20, 174:6, 179:20 occurrence [1] - 189:14 occurring [1] - 106:20 October [17] - 6:17, 10:24, 17:6, 106:10, 119:20, 126:18, 130:27, 132:12, 136:25, 138:9, 140:19, 159:11, 160:24, 169:20, 175:6, 176:5, 176:13 odd [3] - 22:15, 193:24, 193:25 odds [1] - 62:12 OF [4] - 1:3, 1:9, 1:12, 2:3 offence [2] - 107:29, 108:8 offer [2] - 11:18, 192:22 offered [1] - 192:20 offering [3] - 11:26, 12:15, 41:24 OFFICE [1] - 2:18 office [7] - 83:17, 86:12, 130:2, 130:3, 191:26, 192:1, 193:26 Office [21] - 57:6, 68:1, 69:3, 80:6, 82:26, 83:11, 83:15, 99:16, 100:28, 101:1, 101:23, 101:28, 103:8, 103:12, 104:11, 104:14, 104:17, 105:5, 105:11, 110:10, 113:4 Officer [13] - 10:12, 10:16, 38:21, 69:17, 79:16, 79:20, 83:12, 83:23, 96:6, 102:21, 105:15, 111:15, 147:23 officer [1] - 135:21 officer's [4] - 89:14, 90:12, 90:24, 90:29 officers [4] - 32:1, 36:17, 95:28, 131:13 offices [1] - 68:7 official [2] - 118:4,</p>	<p>142:3 officials [2] - 119:29, 125:29 often [5] - 27:14, 78:7, 145:22, 147:24, 165:5 Oireachtas [5] - 121:18, 146:5, 148:16, 155:5, 176:26 OISÍN [1] - 3:28 old [4] - 35:16, 35:17, 40:19, 181:23 Oliver [1] - 117:21 Ombudsman [1] - 141:7 omitted [2] - 73:17, 73:26 ON [4] - 1:6, 1:10, 1:18, 6:1 once [3] - 27:15, 120:4, 135:2 one [59] - 10:24, 11:5, 11:7, 12:19, 15:9, 17:18, 22:15, 27:16, 27:23, 29:16, 37:16, 37:18, 37:21, 39:8, 40:20, 44:15, 46:4, 46:21, 47:2, 48:7, 56:25, 57:18, 59:1, 63:11, 69:19, 69:23, 76:11, 79:8, 81:11, 81:29, 87:15, 91:18, 91:20, 105:9, 108:15, 123:18, 130:10, 130:11, 134:9, 140:5, 142:25, 143:4, 145:16, 149:4, 152:3, 154:12, 154:14, 155:12, 157:23, 159:3, 163:19, 165:18, 167:19, 174:23, 178:21, 180:15, 184:3, 189:16 ones [4] - 82:29, 87:16, 87:18, 134:17 ongoing [5] - 8:7, 111:18, 138:10, 140:14, 142:15 onwards [2] - 42:26, 116:23 open [6] - 38:7, 114:26, 123:29, 129:1, 157:4, 190:29 opened [2] - 26:27, 124:29 operate [4] - 170:14, 170:19, 171:15, 172:25 operation [2] -</p>	<p>172:9, 172:10 opportunist [1] - 162:24 opportunity [7] - 22:22, 49:6, 71:29, 72:26, 73:22, 130:24, 154:25 opposed [1] - 20:13 opposite [1] - 119:7 Opposition [1] - 162:22 oppressive [2] - 91:24, 91:25 orchestrated [1] - 41:25 order [3] - 20:23, 157:10, 195:22 organisation [1] - 175:14 original [3] - 133:5, 134:7, 192:3 OSMOND [1] - 2:19 OTHER [1] - 1:4 otherwise [3] - 55:23, 189:22, 192:26 outcome [5] - 81:7, 82:17, 153:20, 153:21, 162:2 outgoing [1] - 81:13 outlined [4] - 92:3, 93:27, 94:4, 195:16 outrageous [1] - 30:14 outside [10] - 55:17, 57:5, 112:24, 132:6, 164:20, 174:10, 175:13, 180:11, 180:13, 191:9 overall [1] - 20:2 oversight [1] - 131:10 own [13] - 16:1, 27:22, 34:27, 42:16, 50:25, 80:28, 103:7, 103:11, 112:10, 140:22, 146:28, 176:16, 186:6</p>
P				
<p>PAC [32] - 27:3, 27:5, 27:27, 36:18, 37:8, 38:13, 38:29, 39:6, 45:22, 45:29, 46:3, 84:14, 84:21, 84:22, 84:27, 85:1, 85:9, 85:10, 85:18, 85:19, 85:24, 85:25, 85:28, 86:15, 86:16, 86:24,</p>				

<p>139:2, 141:4, 168:14, 168:26, 169:3, 169:15 Padraig [2] - 160:15, 161:28 page [76] - 14:7, 15:10, 21:4, 28:3, 30:1, 31:7, 31:10, 31:11, 50:22, 50:24, 51:8, 51:9, 51:10, 51:12, 57:20, 58:27, 72:2, 72:3, 74:10, 74:11, 75:12, 75:26, 80:15, 80:16, 81:9, 81:16, 82:3, 82:6, 84:11, 84:16, 84:19, 86:24, 86:26, 87:28, 88:12, 89:18, 91:17, 92:17, 110:1, 116:21, 116:22, 120:26, 123:12, 123:13, 123:21, 124:8, 126:22, 126:24, 126:25, 126:29, 127:3, 132:16, 132:17, 132:25, 135:28, 136:20, 159:5, 159:11, 159:13, 159:20, 159:21, 160:10, 160:18, 160:19, 163:12, 164:5, 165:29, 174:18, 177:22, 188:27, 189:1, 189:3, 191:17, 191:19, 195:19 PAGE [1] - 5:2 pages [2] - 89:8, 157:25 painting [2] - 42:17, 152:29 panic [1] - 49:24 papers [11] - 9:29, 48:17, 50:22, 51:8, 74:10, 82:23, 83:27, 84:2, 96:15, 166:11, 166:13 paragraph [15] - 30:2, 124:1, 127:18, 159:17, 159:18, 159:19, 162:4, 162:6, 162:8, 170:8, 170:18, 189:3, 190:17, 191:18, 193:8 paragraphs [1] - 136:19 parameters [1] - 108:3 paraphrase [1] - 164:6 paraphrasing [2] -</p>	<p>19:5, 173:17 pardon [11] - 8:18, 36:22, 39:12, 45:9, 75:22, 77:28, 89:16, 102:14, 103:2, 158:8, 175:2 parent [3] - 145:16, 145:21, 145:22 parented [1] - 146:14 parish [2] - 180:8, 180:20 Park [1] - 69:2 park [1] - 149:28 PARLIAMENT [1] - 2:25 parliamentarian [1] - 36:16 parliamentarians [1] - 17:1 part [30] - 15:14, 16:5, 16:24, 22:1, 22:2, 31:11, 33:28, 34:10, 35:25, 36:20, 37:15, 42:19, 43:2, 44:21, 73:4, 82:11, 86:15, 99:3, 105:26, 106:23, 140:10, 142:5, 145:20, 146:14, 154:4, 156:21, 164:10, 166:11, 166:13, 174:25 partake [1] - 155:16 partially [2] - 143:19, 173:13 participate [1] - 37:2 participated [1] - 155:20 particular [43] - 12:27, 25:1, 31:16, 42:8, 61:16, 64:5, 64:26, 66:24, 71:13, 85:11, 105:8, 114:9, 114:11, 120:12, 121:22, 122:24, 143:20, 157:12, 157:22, 160:24, 160:29, 161:1, 162:14, 164:4, 165:9, 165:11, 166:19, 166:23, 172:22, 173:21, 174:28, 177:25, 178:5, 178:17, 179:5, 180:18, 180:25, 181:6, 182:16, 182:26, 187:19, 196:12 particularly [7] - 10:24, 11:29, 61:23,</p>	<p>110:29, 129:7, 155:24, 194:2 parties [1] - 124:16 partly [1] - 16:15 PARTNERS [1] - 4:10 party [1] - 193:10 pass [2] - 94:3, 94:15 passed [7] - 71:25, 91:9, 92:15, 119:29, 120:17, 130:3, 170:2 PASSED [1] - 1:5 passing [3] - 89:9, 93:4, 94:6 past [4] - 48:26, 49:1, 97:8, 131:24 patently [1] - 143:8 PATRICIA [1] - 3:2 PATRICK [1] - 2:6 patrol [4] - 89:14, 90:12, 90:23, 90:29 Paul [21] - 13:20, 43:27, 56:6, 56:8, 56:20, 57:15, 57:17, 108:19, 150:22, 151:9, 151:28, 152:4, 154:9, 155:3, 155:8, 155:18, 177:26, 177:28, 178:15, 178:19, 179:14 PAUL [2] - 2:10, 3:5 pause [1] - 31:25 pay [2] - 9:7, 9:8 PD [3] - 17:12, 40:11, 40:12 peevied [1] - 67:16 pejorative [1] - 29:5 penalties [1] - 192:4 penalty [36] - 67:7, 67:20, 70:13, 85:19, 117:6, 117:15, 119:17, 121:8, 121:19, 121:28, 124:7, 126:21, 126:25, 127:6, 127:13, 132:15, 132:20, 132:24, 133:21, 133:22, 134:13, 136:26, 138:1, 138:5, 141:6, 148:7, 159:8, 159:16, 159:20, 160:26, 160:28, 161:4, 161:9, 166:18, 170:15, 175:26 people [36] - 12:10, 17:5, 17:15, 17:16, 17:20, 25:7, 26:6, 29:2, 61:3, 83:28, 106:8, 110:11,</p>	<p>110:27, 111:27, 112:21, 113:3, 114:7, 114:8, 115:8, 115:11, 117:24, 127:24, 134:5, 148:8, 156:22, 162:29, 180:2, 180:20, 182:19, 182:20, 187:27, 187:28, 189:25, 191:2 perceived [3] - 142:21, 146:27, 154:6 perception [6] - 144:26, 145:8, 145:10, 146:28, 146:29, 186:6 perfect [1] - 78:7 perhaps [33] - 22:25, 32:6, 34:18, 37:13, 43:23, 44:26, 49:27, 50:2, 51:9, 53:13, 65:6, 66:16, 76:15, 80:16, 82:29, 83:3, 84:11, 86:22, 87:14, 88:12, 93:6, 105:6, 106:27, 106:29, 113:5, 113:23, 144:22, 145:24, 147:3, 160:3, 166:14, 184:1, 193:28 period [8] - 74:15, 79:27, 112:17, 117:28, 121:10, 138:20, 149:15, 171:6 periods [2] - 87:10, 148:23 person [23] - 15:5, 25:9, 25:18, 25:20, 41:24, 59:6, 69:7, 70:12, 88:1, 104:17, 122:27, 154:10, 163:19, 166:22, 173:4, 178:17, 178:21, 180:24, 182:16, 191:8, 192:2, 195:22 person's [2] - 34:1, 191:3 personal [10] - 12:5, 46:1, 69:10, 103:5, 144:24, 146:28, 152:3, 181:9, 186:7, 191:29 personally [3] - 98:27, 129:25, 165:22 persons [4] - 133:1, 133:7, 163:29, 189:24 perspective [6] - 125:25, 156:7, 180:1, 180:2, 195:15, 195:18 persuade [2] - 55:23,</p>	<p>157:3 pertaining [1] - 14:20 perverting [1] - 164:29 PETER [3] - 1:12, 2:2, 2:4 Phelan [2] - 48:5, 49:13 PHELAN [7] - 4:2, 5:5, 48:5, 48:12, 48:14, 49:11, 49:14 Phoenix [1] - 69:2 phone [37] - 56:13, 57:16, 57:23, 58:1, 58:3, 58:20, 59:1, 59:14, 68:4, 75:15, 75:17, 75:23, 77:3, 77:5, 78:28, 79:2, 79:3, 79:8, 79:11, 80:22, 88:2, 88:9, 88:13, 88:15, 88:20, 88:22, 88:23, 88:28, 90:28, 130:13, 131:25, 143:29, 150:22, 151:7, 186:19, 191:26 phoned [9] - 76:17, 76:26, 82:14, 88:1, 88:3, 89:27, 90:6, 90:8, 168:28 phones [8] - 18:24, 19:16, 19:29, 20:6, 20:21, 88:1, 101:11, 115:15 phoning [2] - 13:7, 80:8 photographs [2] - 11:8, 11:11 phrase [1] - 105:10 physical [1] - 115:20 picked [6] - 101:29, 102:1, 102:7, 102:9, 102:12, 158:22 picture [4] - 14:15, 14:16, 15:3, 15:6 piece [1] - 32:6 pilloried [2] - 121:24, 143:15 PLACE [1] - 4:21 place [25] - 23:6, 41:26, 49:7, 57:7, 57:25, 122:6, 127:11, 129:4, 136:28, 137:19, 139:5, 139:15, 149:9, 149:22, 150:5, 151:20, 152:7, 154:5, 165:15, 177:10, 177:26, 183:13,</p>
---	---	--	--	---

<p>183:14, 183:20, 186:14</p> <p>placed [6] - 37:16, 40:16, 40:21, 51:9, 106:5</p> <p>places [2] - 110:17</p> <p>plan [9] - 42:8, 42:12, 42:19, 108:25, 108:27, 109:18, 109:19</p> <p>planning [1] - 101:17</p> <p>play [1] - 70:23</p> <p>played [1] - 78:18</p> <p>playing [1] - 114:15</p> <p>plot [1] - 115:28</p> <p>plus [1] - 26:3</p> <p>point [54] - 8:29, 20:17, 20:28, 37:17, 37:24, 40:4, 41:13, 41:21, 42:10, 42:11, 42:21, 42:22, 45:25, 52:20, 57:9, 57:26, 59:9, 59:26, 64:5, 66:24, 73:19, 85:17, 85:20, 94:22, 100:26, 107:17, 131:24, 133:29, 139:10, 140:24, 141:6, 147:12, 157:9, 159:8, 160:26, 160:28, 161:4, 161:10, 163:3, 163:14, 163:27, 166:18, 169:1, 173:1, 173:25, 173:29, 174:27, 175:27, 176:10, 182:24, 182:25, 187:24, 195:4</p> <p>pointed [4] - 19:9, 163:24, 163:27, 176:4</p> <p>pointing [2] - 106:23, 174:21</p> <p>points [27] - 12:6, 64:28, 67:7, 67:20, 117:6, 117:15, 119:17, 121:19, 121:28, 126:25, 127:6, 127:14, 132:16, 132:20, 132:24, 133:21, 133:22, 134:13, 136:26, 138:1, 138:6, 148:7, 159:16, 159:20, 170:15, 175:27</p> <p>police [1] - 35:17</p> <p>policing [4] - 104:24, 117:3, 118:20, 122:16</p> <p>political [11] - 26:27, 26:29, 162:19, 163:5, 163:6, 163:23,</p>	<p>163:26, 165:4, 167:7, 179:27, 179:28</p> <p>politically [1] - 162:23</p> <p>politicians [2] - 26:25, 42:24</p> <p>politicians' [1] - 26:26</p> <p>politics [1] - 180:7</p> <p>poor [3] - 76:16, 77:10, 162:3</p> <p>portion [1] - 95:20</p> <p>portrayal [2] - 97:8, 97:9</p> <p>portrayed [2] - 113:14, 145:9</p> <p>position [62] - 6:10, 6:27, 7:12, 10:17, 11:14, 11:20, 12:26, 14:9, 16:16, 16:21, 16:29, 17:24, 18:6, 18:13, 19:29, 22:23, 23:2, 23:17, 25:27, 32:15, 37:1, 43:14, 43:21, 43:22, 43:26, 43:29, 45:17, 45:22, 45:28, 46:13, 47:17, 47:22, 54:8, 54:27, 56:22, 59:13, 60:26, 61:22, 61:26, 62:7, 62:26, 63:9, 64:2, 64:27, 65:18, 65:27, 68:15, 83:11, 83:14, 92:25, 93:25, 94:16, 94:17, 99:25, 102:10, 104:5, 111:4, 114:20, 166:25, 187:26</p> <p>positive [1] - 37:14</p> <p>positively [1] - 109:1</p> <p>possession [1] - 124:18</p> <p>possibilities [1] - 16:9</p> <p>possibility [3] - 9:28, 107:1, 183:18</p> <p>possible [9] - 16:17, 65:14, 72:15, 80:10, 81:1, 81:22, 99:5, 126:3, 143:17</p> <p>possibly [3] - 41:19, 156:12, 188:23</p> <p>post [1] - 10:23</p> <p>postmortem [2] - 39:15, 39:17</p> <p>postponed [1] - 153:3</p> <p>potential [1] - 16:7</p> <p>potentially [1] - 112:23</p> <p>power [1] - 169:9</p>	<p>powers [1] - 162:28</p> <p>practice [5] - 30:9, 50:18, 51:6, 85:27, 164:18</p> <p>practises [1] - 51:11</p> <p>practising [1] - 145:13</p> <p>praised [1] - 165:12</p> <p>pre [6] - 84:22, 85:25, 85:28, 86:16, 86:24, 87:16</p> <p>pre-meetings [1] - 87:16</p> <p>pre-PAC [5] - 84:22, 85:25, 85:28, 86:16, 86:24</p> <p>preceded [1] - 93:11</p> <p>preceding [1] - 138:20</p> <p>precise [1] - 23:3</p> <p>predate [1] - 26:11</p> <p>predated [1] - 23:12</p> <p>predecessor [1] - 167:20</p> <p>predicament [1] - 42:1</p> <p>preferable [1] - 189:28</p> <p>prejudice [2] - 70:7, 124:15</p> <p>premise [2] - 115:8, 115:11</p> <p>preparation [1] - 84:27</p> <p>prepare [1] - 137:8</p> <p>prepared [1] - 86:25</p> <p>prescribed [1] - 131:10</p> <p>presence [3] - 27:23, 87:14, 154:9</p> <p>present [11] - 21:7, 27:23, 43:5, 48:26, 49:2, 58:4, 58:9, 58:10, 68:8, 147:23, 192:1</p> <p>preserved [3] - 119:27, 138:23, 139:25</p> <p>president [2] - 88:4, 89:4</p> <p>press [18] - 10:1, 69:1, 73:20, 75:3, 75:9, 79:25, 80:2, 82:25, 83:22, 84:4, 111:17, 112:22, 113:22, 147:21, 147:24, 148:3, 170:11</p> <p>Press [34] - 10:12, 10:16, 38:21, 57:6, 68:1, 69:3, 69:17,</p>	<p>79:16, 79:20, 80:6, 82:26, 83:11, 83:12, 83:15, 83:23, 96:6, 99:15, 100:27, 100:29, 101:22, 101:28, 102:21, 103:8, 103:12, 104:11, 104:14, 104:16, 105:5, 105:10, 105:15, 110:10, 111:15, 113:3, 147:23</p> <p>pressure [2] - 42:3, 167:15</p> <p>presumably [4] - 35:5, 74:19, 82:10, 83:7</p> <p>presume [2] - 159:22, 171:27</p> <p>presumed [1] - 178:23</p> <p>pretty [7] - 12:13, 30:19, 30:21, 63:21, 115:2, 143:25, 186:24</p> <p>prevails [1] - 163:21</p> <p>previous [9] - 54:23, 79:2, 83:25, 90:28, 91:5, 138:15, 139:2, 151:4, 192:10</p> <p>previously [5] - 87:6, 133:8, 137:4, 137:27, 138:11</p> <p>pricked [1] - 38:4</p> <p>priest [4] - 25:21, 25:22, 25:25, 26:17</p> <p>primarily [3] - 125:23, 133:18, 141:5</p> <p>principally [1] - 46:5</p> <p>principles [1] - 165:21</p> <p>priorities [1] - 26:16</p> <p>private [4] - 67:13, 133:10, 148:3, 150:13</p> <p>privately [1] - 111:15</p> <p>privilege [13] - 48:21, 61:21, 62:1, 62:3, 62:9, 62:11, 63:2, 63:16, 64:20, 65:15, 65:23, 65:25</p> <p>proactive [1] - 12:16</p> <p>proactively [1] - 46:6</p> <p>probability [1] - 189:16</p> <p>problem [8] - 26:15, 110:7, 110:8, 110:22, 136:6, 142:9, 143:21, 165:3</p> <p>problems [1] - 183:9</p> <p>procedures [2] - 162:3, 164:18</p>	<p>proceed [2] - 49:27, 124:14</p> <p>proceedings [4] - 42:6, 42:14, 139:1, 167:18</p> <p>process [11] - 42:25, 64:13, 74:15, 128:9, 128:23, 131:7, 131:27, 187:19, 189:27, 189:28, 195:28</p> <p>processing [2] - 164:17, 196:25</p> <p>produced [4] - 86:8, 120:9, 177:7, 196:17</p> <p>productive [1] - 137:16</p> <p>profession [1] - 62:29</p> <p>Professional [1] - 196:18</p> <p>professional [2] - 111:23, 120:8</p> <p>professionally [1] - 103:5</p> <p>profile [4] - 111:3, 111:4, 111:5, 118:9</p> <p>progress [1] - 123:27</p> <p>promoted [3] - 103:22, 103:24, 104:2</p> <p>promotion [9] - 103:28, 104:1, 104:3, 104:5, 104:13, 104:18, 104:23, 104:27, 104:28</p> <p>promptly [1] - 119:4</p> <p>proof [1] - 128:29</p> <p>propagate [1] - 106:19</p> <p>proper [5] - 43:23, 60:8, 124:19, 164:18, 190:13</p> <p>properly [8] - 23:19, 24:10, 92:22, 131:5, 152:25, 179:17, 182:22, 183:16</p> <p>proportionately [2] - 119:1, 119:4</p> <p>proposed [1] - 178:24</p> <p>proposing [1] - 154:3</p> <p>proposition [3] - 48:19, 61:17, 191:4</p> <p>prosecuted [1] - 186:11</p> <p>prosecution [7] - 144:20, 149:4, 184:7, 184:17, 184:19,</p>
--	--	---	---	---

<p>184:20 protect [3] - 119:25, 168:10, 176:23 PROTECTED [2] - 1:3, 1:4 protected [22] - 17:12, 26:21, 26:23, 30:27, 30:28, 40:2, 42:27, 47:15, 47:18, 47:26, 69:7, 72:19, 79:10, 91:19, 92:29, 99:5, 100:7, 100:16, 106:6, 106:25, 122:27 protecting [1] - 42:16 protection [2] - 69:10, 190:7 protest [1] - 130:22 protested [1] - 172:13 protocol [2] - 31:29, 32:7 proved [2] - 146:19, 146:20 provide [8] - 15:6, 40:18, 72:15, 72:27, 72:28, 124:19, 129:16, 129:18 provided [13] - 28:19, 28:22, 30:3, 50:23, 70:10, 73:12, 73:22, 74:14, 76:2, 76:3, 137:3, 142:27, 193:16 provisions [3] - 121:29, 190:6, 190:8 précis [1] - 150:28 PSU [1] - 120:8 public [25] - 45:16, 63:25, 64:1, 64:2, 76:17, 76:23, 78:18, 78:21, 108:13, 111:3, 129:12, 134:6, 143:3, 143:14, 166:23, 166:26, 167:8, 168:25, 176:10, 176:17, 176:18, 188:3, 188:18, 189:22, 195:6 Public [6] - 132:14, 132:22, 140:29, 148:6, 150:12, 166:27 publication [8] - 82:18, 129:9, 150:7, 161:25, 169:20, 186:24, 186:26, 188:9 Publications [1] - 17:23 publicity [1] - 144:14 publicly [3] - 45:28,</p>	<p>121:24, 143:15 published [29] - 44:28, 79:13, 82:8, 83:29, 88:17, 120:10, 125:8, 125:9, 125:10, 128:28, 129:2, 130:15, 131:16, 135:6, 135:20, 137:28, 142:14, 142:15, 143:25, 143:27, 161:21, 165:24, 186:15, 186:16, 186:27, 188:11, 191:22, 196:22, 196:27 publishing [2] - 130:17, 194:3 pulled [1] - 34:28 pulse [3] - 164:28, 168:19, 175:25 Pulse [18] - 24:25, 24:29, 25:5, 46:2, 128:19, 132:4, 132:5, 134:27, 134:29, 135:3, 135:9, 172:19, 173:19, 173:20, 174:10, 175:11, 176:2, 179:21 pump [1] - 180:8 Purcell [3] - 150:2, 150:8, 150:10 purpose [7] - 9:17, 10:26, 12:7, 43:1, 140:27, 182:24, 186:20 purposes [1] - 189:5 pursue [2] - 8:5, 46:4 pursued [5] - 17:2, 17:6, 17:13, 153:16, 153:24 pursuing [1] - 153:23 pushing [1] - 190:28 put [75] - 8:12, 9:7, 11:19, 15:21, 15:25, 16:28, 18:23, 20:17, 25:12, 26:6, 26:10, 29:10, 29:27, 38:19, 39:27, 40:9, 40:11, 40:16, 40:24, 41:29, 43:7, 43:21, 43:23, 44:20, 48:7, 48:15, 48:19, 48:23, 49:5, 49:16, 49:26, 57:14, 57:18, 57:21, 58:18, 58:19, 58:22, 58:24, 59:10, 59:12, 59:15, 61:18, 61:28, 63:17, 64:19, 64:21, 64:25, 64:28, 65:23, 66:12,</p>	<p>67:17, 67:28, 68:16, 71:27, 102:20, 104:19, 104:24, 106:2, 107:11, 110:18, 112:28, 137:26, 152:18, 152:28, 167:15, 169:6, 174:15, 180:28, 182:14, 185:25, 185:27, 186:14, 187:24, 194:19 puts [1] - 161:28 putting [10] - 6:20, 13:22, 15:17, 20:25, 105:9, 117:12, 133:2, 151:21, 166:15, 175:27 puzzle [1] - 136:14 puzzled [1] - 148:14</p>	<p>quicksand [1] - 146:25 Quinn [2] - 17:22, 61:24 QUINN [1] - 3:28 quite [15] - 7:8, 7:27, 15:17, 24:9, 31:4, 33:29, 72:10, 126:3, 134:15, 142:11, 142:12, 151:13, 168:11, 168:14, 187:17 quote [1] - 128:25 quotes [1] - 78:1 quoting [1] - 29:24</p>	<p>rarified [1] - 149:9 rather [3] - 193:23, 193:25, 196:2 RE [4] - 5:9, 5:17, 71:20, 194:16 re [8] - 31:26, 66:24, 75:15, 130:18, 137:10, 142:23, 155:3, 155:8 re-call [1] - 66:24 re-examined [1] - 137:10 RE-EXAMINED [4] - 5:9, 5:17, 71:20, 194:16 re-read [2] - 155:3, 155:8 re-telling [1] - 31:26 re-visit [2] - 130:18, 142:23 reached [2] - 119:8, 129:28 reaction [3] - 53:18, 143:28, 144:11 read [25] - 10:4, 14:10, 44:4, 62:16, 70:28, 70:29, 76:21, 82:10, 82:22, 82:23, 83:27, 84:2, 84:4, 111:25, 139:1, 150:29, 151:1, 155:3, 155:8, 159:28, 169:17, 171:23, 172:3, 179:15, 191:2 readable [1] - 160:7 reading [4] - 63:15, 170:27, 177:12, 186:2 real [1] - 134:21 realisation [1] - 113:11 realise [1] - 113:17 reality [2] - 164:15, 190:28 really [9] - 7:27, 31:4, 44:18, 55:18, 60:21, 132:11, 148:23, 150:25, 156:7 rear [1] - 67:3 reason [21] - 11:27, 15:1, 15:2, 19:15, 20:1, 20:5, 38:11, 41:3, 41:6, 41:10, 41:23, 65:26, 100:25, 112:27, 123:18, 123:20, 159:26, 166:15, 174:15, 179:12, 182:25 reasonably [1] - 119:4 reasons [3] - 65:3,</p>
R				
<p>radio [2] - 39:1, 77:19 railings [2] - 35:2, 35:26 raise [10] - 65:26, 122:24, 154:21, 154:28, 155:10, 156:11, 182:26, 183:18, 185:4, 188:13 raised [29] - 65:12, 77:23, 116:29, 125:18, 125:21, 125:22, 127:4, 128:7, 128:10, 128:27, 134:7, 135:5, 142:17, 142:20, 144:5, 146:21, 146:25, 147:29, 149:25, 154:11, 161:27, 161:28, 165:13, 167:22, 180:16, 182:29, 183:7, 185:10, 186:20 raises [2] - 50:2, 77:15 raising [4] - 46:21, 121:26, 165:12, 184:29 random [1] - 196:11 rang [10] - 13:10, 13:11, 13:13, 25:24, 47:4, 56:9, 56:16, 67:12, 81:5, 88:8 range [5] - 131:8, 153:28, 164:21, 176:11, 183:8 rank [1] - 104:13 rape [1] - 191:1 rapes [2] - 97:4, 111:12 rapid [1] - 85:7</p>				
Q				
<p>qualification [1] - 193:28 qualified [1] - 104:12 QUAY [3] - 2:12, 3:23, 4:11 QUEEN [1] - 4:16 query [4] - 142:17, 142:19, 145:7, 185:4 questionable [1] - 196:3 questioned [5] - 50:10, 92:2, 93:20, 181:2, 181:4 QUESTIONED [2] - 5:10, 107:5 questioning [4] - 21:4, 91:24, 136:7, 139:8 questions [39] - 13:29, 15:8, 44:2, 49:17, 49:28, 50:9, 61:12, 61:13, 61:14, 65:24, 65:27, 66:2, 71:27, 84:28, 85:6, 85:7, 85:10, 85:12, 85:13, 93:7, 94:24, 107:7, 138:15, 156:16, 156:25, 157:8, 160:20, 161:9, 161:16, 163:5, 175:20, 184:25, 187:6, 187:7, 187:8, 187:12, 194:11, 194:13 quibble [1] - 95:18 quickly [1] - 115:2</p>				

<p>105:6, 131:23 recalled [1] - 47:22 recalling [2] - 15:23, 73:19 receipt [1] - 131:28 receive [1] - 99:18 received [23] - 51:15, 51:22, 52:2, 58:1, 67:9, 89:14, 89:15, 89:17, 89:25, 91:4, 98:10, 118:3, 119:29, 121:11, 121:21, 122:2, 122:8, 122:18, 125:26, 130:14, 131:26, 148:15, 194:1 receiving [4] - 72:21, 86:29, 91:5, 153:26 recent [2] - 77:5, 77:7 recently [4] - 29:13, 50:23, 177:12, 181:18 recipient [4] - 117:21, 123:5, 124:22, 189:26 reciting [1] - 150:27 recollect [8] - 18:29, 19:6, 52:9, 52:19, 52:23, 52:27, 75:23, 166:27 recollected [1] - 57:16 recollection [34] - 6:15, 8:11, 13:6, 13:18, 15:19, 15:24, 21:21, 27:22, 31:25, 37:6, 57:22, 59:1, 75:19, 80:7, 81:4, 84:9, 84:24, 86:4, 86:5, 86:18, 87:23, 117:17, 118:7, 143:23, 148:28, 151:11, 153:3, 154:20, 161:12, 169:28, 173:15, 179:17, 179:22, 186:17 recollections [1] - 15:25 recommend [1] - 123:1 recommendations [3] - 120:16, 126:2, 137:29 recommended [1] - 153:10 record [19] - 17:15, 37:16, 40:22, 45:16, 49:8, 58:23, 59:16, 137:4, 137:17, 137:25, 147:18,</p>	<p>157:29, 161:16, 161:29, 164:10, 171:24, 171:26, 172:14, 181:20 recorded [6] - 95:8, 130:9, 157:14, 172:4, 181:5, 181:7 records [6] - 25:5, 83:6, 86:28, 88:9, 90:23, 157:27 recruits [1] - 147:27 redacted [7] - 120:24, 123:15, 123:19, 123:21, 124:2, 124:24, 136:13 redirect [1] - 14:7 reduced [1] - 9:7 refer [4] - 30:15, 51:11, 79:11, 159:5 reference [29] - 20:23, 29:17, 30:14, 30:26, 40:2, 40:3, 50:24, 51:18, 55:18, 72:20, 93:13, 107:28, 107:29, 115:21, 133:13, 136:13, 145:6, 156:20, 156:29, 162:17, 163:8, 171:9, 173:8, 176:21, 176:23, 183:6, 188:10, 188:12, 192:16 referenced [6] - 123:10, 134:9, 135:2, 151:16, 165:10, 179:20 referencing [4] - 123:23, 123:26, 133:29, 154:3 referred [17] - 77:21, 86:4, 97:17, 101:21, 109:29, 120:3, 125:13, 131:16, 131:18, 131:20, 149:27, 157:12, 157:16, 165:25, 170:5, 172:16, 191:12 referring [8] - 51:19, 57:27, 89:13, 92:28, 133:24, 141:5, 158:1, 172:24 refers [4] - 162:2, 162:6, 170:9, 170:11 refine [1] - 194:26 reflect [1] - 190:19 reflecting [1] - 129:13 reflection [1] - 113:15 reflective [1] - 38:15</p>	<p>reflects [2] - 59:10, 193:23 Reform [1] - 180:7 reform [1] - 180:12 refrain [1] - 175:25 refused [2] - 171:26, 182:21 regard [13] - 63:29, 86:19, 99:4, 121:7, 122:1, 128:18, 132:24, 137:29, 168:18, 174:23, 180:7, 183:11 regarded [6] - 48:27, 98:28, 102:27, 139:23, 190:24, 195:7 regarding [5] - 50:18, 61:29, 124:5, 143:13, 192:3 regards [2] - 94:21, 111:27 Region [2] - 68:28, 69:5 REGISTRAR [1] - 2:4 regret [6] - 96:8, 96:23, 112:18, 113:29, 115:2 regrets [1] - 44:8 regrettable [2] - 96:22, 112:25 regrettably [1] - 41:29 regular [1] - 97:24 regularly [3] - 9:20, 12:9, 180:11 regulations [4] - 96:13, 190:4, 190:7, 190:9 reiterate [2] - 30:22, 49:7 reiterated [1] - 164:23 reject [1] - 44:11 rejected [1] - 12:22 relate [2] - 100:6, 108:12 related [12] - 11:25, 11:27, 46:14, 69:1, 101:4, 108:12, 145:4, 146:11, 175:10, 178:23, 183:14, 183:15 relates [1] - 86:26 relating [7] - 14:12, 34:5, 74:29, 84:25, 86:13, 105:29, 135:21 relation [137] - 6:10, 6:20, 7:8, 7:25, 11:13, 12:20, 12:29, 13:4, 13:27, 13:29, 14:3,</p>	<p>14:22, 16:6, 17:24, 39:25, 44:26, 44:27, 45:5, 45:7, 45:12, 45:24, 50:9, 50:11, 50:17, 51:5, 51:18, 51:21, 51:23, 52:5, 52:11, 53:1, 54:18, 55:10, 55:14, 55:21, 56:11, 56:28, 57:25, 58:21, 58:23, 58:25, 61:20, 61:27, 62:6, 62:26, 62:28, 63:8, 63:23, 64:11, 64:14, 64:16, 64:27, 64:29, 65:2, 65:11, 65:18, 67:12, 67:27, 74:1, 75:3, 75:24, 75:29, 78:4, 78:17, 85:3, 85:13, 89:8, 91:12, 91:22, 92:11, 92:15, 92:26, 93:2, 93:6, 94:2, 94:5, 94:6, 94:12, 94:14, 94:15, 94:23, 96:15, 106:3, 107:19, 108:7, 109:1, 109:3, 114:2, 115:12, 117:15, 117:17, 117:18, 118:11, 118:25, 125:4, 126:21, 126:29, 127:6, 127:13, 127:15, 132:14, 133:21, 133:22, 133:27, 135:14, 135:15, 136:18, 138:5, 138:7, 138:8, 140:20, 140:25, 142:18, 144:17, 146:17, 149:1, 149:27, 156:28, 157:16, 157:24, 157:26, 160:14, 160:26, 160:27, 160:29, 168:21, 176:3, 182:27, 184:3, 184:28, 184:29, 187:19, 187:22, 188:17, 194:18, 194:23 relationship [1] - 114:7 relatively [2] - 50:23, 157:6 relayed [4] - 16:21, 22:16, 23:17, 34:2 release [6] - 56:11, 62:10, 63:1, 63:12, 142:29, 170:11 relevance [4] - 75:6, 134:4, 134:6, 193:12</p>	<p>relevant [10] - 31:11, 74:15, 74:17, 74:29, 85:2, 116:22, 181:29, 187:21, 191:16, 193:29 reliance [1] - 65:1 rely [1] - 64:11 remain [3] - 18:10, 171:20, 189:26 remained [1] - 105:13 remark [5] - 27:25, 30:5, 39:26, 40:18, 40:25 remember [21] - 22:8, 24:6, 34:20, 37:10, 37:12, 73:10, 77:12, 126:6, 126:10, 126:11, 126:15, 147:15, 147:17, 154:26, 155:21, 155:23, 155:29, 161:18, 162:19, 178:8 remembering [1] - 73:8 reminds [1] - 123:22 remonstrating [1] - 131:12 removed [7] - 41:11, 44:19, 100:27, 110:10, 110:11, 110:24, 113:13 removing [1] - 101:22 reopening [1] - 153:17 repeated [2] - 121:16, 133:5 replaced [1] - 78:27 replied [2] - 65:2, 78:7 reply [1] - 122:18 Report [3] - 154:25, 183:2, 183:3 report [84] - 44:27, 45:3, 45:8, 45:13, 88:10, 89:14, 90:12, 90:19, 90:24, 90:29, 91:4, 92:4, 93:13, 93:14, 93:28, 94:4, 94:12, 94:21, 94:25, 94:26, 95:5, 95:10, 95:13, 95:22, 96:19, 118:29, 120:5, 120:7, 120:9, 120:17, 120:18, 121:11, 122:2, 122:7, 122:20, 125:8, 125:26, 129:9, 129:10, 129:17, 130:14, 130:15,</p>
--	---	--	---	---

<p>130:17, 130:22, 131:8, 131:16, 131:29, 134:14, 134:15, 134:20, 135:6, 135:9, 136:1, 137:8, 143:25, 143:27, 143:29, 150:8, 154:23, 161:19, 161:25, 164:13, 164:15, 164:22, 165:10, 165:11, 169:21, 172:7, 172:12, 186:15, 186:16, 186:27, 188:11, 190:14, 192:19, 193:14, 194:3, 195:23, 195:27, 196:17, 196:21, 196:22, 196:27</p> <p>reported [3] - 125:6, 125:9, 162:1</p> <p>reporters [1] - 190:10</p> <p>reporters' [1] - 190:8</p> <p>reporting [3] - 57:6, 156:27, 190:3</p> <p>reports [7] - 97:5, 120:10, 128:28, 134:21, 137:28, 139:6, 151:16</p> <p>represent [5] - 48:6, 61:10, 66:6, 67:3, 180:19</p> <p>representation [3] - 60:3, 60:13, 66:15</p> <p>representatives [2] - 60:6, 180:19</p> <p>represented [6] - 60:5, 60:10, 60:11, 60:12, 61:9, 66:7</p> <p>representing [3] - 60:21, 60:24, 159:4</p> <p>represents [2] - 48:9, 60:25</p> <p>reputation [1] - 134:5</p> <p>request [8] - 12:28, 120:2, 142:3, 171:26, 176:28, 176:29, 177:26, 178:10</p> <p>requested [4] - 43:26, 85:8, 120:18, 167:24</p> <p>requests [2] - 133:4, 133:14</p> <p>required [3] - 130:17, 171:2, 196:10</p> <p>requirements [1] - 189:27</p>	<p>requisite [1] - 104:12</p> <p>residence [1] - 69:11</p> <p>resignation [4] - 77:26, 178:25, 182:9, 182:11</p> <p>resigned [4] - 10:28, 56:19, 150:18, 179:2</p> <p>resigning [1] - 179:3</p> <p>RESOLUTIONS [1] - 1:5</p> <p>resolve [1] - 143:16</p> <p>resources [1] - 45:20</p> <p>respect [15] - 10:27, 15:24, 29:5, 37:14, 47:21, 49:8, 60:3, 61:17, 93:22, 113:18, 120:1, 136:28, 150:23, 151:28, 190:22</p> <p>respected [6] - 114:19, 124:17, 131:22, 136:11, 167:6, 188:7</p> <p>respects [2] - 48:21, 102:23</p> <p>respond [3] - 49:6, 117:29, 124:4</p> <p>responded [2] - 144:6, 173:6</p> <p>responding [2] - 123:28, 185:15</p> <p>response [6] - 12:13, 19:5, 117:26, 132:12, 138:2, 164:2</p> <p>responsibilities [2] - 112:11, 190:2</p> <p>responsibility [1] - 124:13</p> <p>responsible [2] - 70:6, 182:3</p> <p>rest [2] - 96:20, 137:26</p> <p>restricted [1] - 172:19</p> <p>result [6] - 42:19, 106:20, 118:2, 127:5, 142:14, 153:21</p> <p>resulted [1] - 127:28</p> <p>RESUMED [2] - 6:1, 116:8</p> <p>resumes [1] - 69:24</p> <p>resurfacing [1] - 134:20</p> <p>retired [5] - 8:23, 11:26, 12:10, 55:11, 102:28</p> <p>retirement [2] - 10:23, 43:28</p> <p>retreated [1] - 37:28</p> <p>retrieve [1] - 32:1</p>	<p>retrieving [3] - 33:4, 34:15, 35:7</p> <p>return [2] - 50:2, 66:16</p> <p>returned [2] - 79:6, 104:20</p> <p>returns [1] - 50:1</p> <p>revealed [4] - 111:11, 111:14, 111:17, 164:10</p> <p>revealing [2] - 29:15, 112:24</p> <p>revelation [1] - 163:19</p> <p>revelations [1] - 164:8</p> <p>revenge [4] - 42:9, 107:24, 154:7, 186:2</p> <p>reverted [1] - 191:27</p> <p>review [2] - 120:15, 194:5</p> <p>reviewing [1] - 74:16</p> <p>revisit [3] - 22:22, 22:23, 64:7</p> <p>Reynolds [7] - 43:28, 56:6, 56:8, 56:11, 56:15, 56:21, 103:9</p> <p>ridiculed [1] - 143:19</p> <p>riding [1] - 35:23</p> <p>rights [4] - 61:2, 62:20, 63:13, 124:16</p> <p>Rights [1] - 62:13</p> <p>ring [1] - 13:10</p> <p>ringing [2] - 113:3, 150:25</p> <p>rise [1] - 149:3</p> <p>road [2] - 127:24, 134:11</p> <p>ROAD [1] - 4:7</p> <p>robust [1] - 7:17</p> <p>rode [1] - 34:29</p> <p>rodent [2] - 115:1, 115:21</p> <p>role [10] - 18:7, 22:17, 25:8, 57:6, 80:5, 102:1, 102:4, 102:7, 132:23, 164:27</p> <p>roll [1] - 25:7</p> <p>Roma [22] - 14:3, 14:12, 14:20, 75:15, 75:24, 88:17, 89:6, 91:18, 92:11, 92:14, 92:15, 92:26, 92:28, 93:4, 94:3, 94:6, 94:14, 94:15, 95:11, 96:20, 112:4</p> <p>RONAN [2] - 3:1, 3:29</p> <p>room [5] - 26:2, 37:28, 49:17, 66:10,</p>	<p>67:3</p> <p>ROSSA [1] - 3:5</p> <p>round [1] - 85:7</p> <p>routine [1] - 50:18</p> <p>row [1] - 167:9</p> <p>RTÉ [2] - 3:1, 3:2</p> <p>rules [1] - 131:10</p> <p>ruling [1] - 62:27</p> <p>rumours [3] - 148:9, 148:12, 149:14</p> <p>run [2] - 38:12, 87:18</p> <p>running [3] - 105:10, 157:10, 168:19</p>	<p>secret [1] - 45:16</p> <p>secretary [2] - 89:4, 122:14</p> <p>section [4] - 95:22, 120:8, 120:9, 122:16</p> <p>secure [1] - 137:15</p> <p>security [3] - 69:8, 69:10, 69:14</p> <p>see [69] - 10:7, 11:1, 13:14, 14:29, 16:9, 19:20, 19:26, 25:26, 28:3, 28:10, 28:21, 29:1, 29:13, 31:1, 31:11, 33:15, 33:16, 33:17, 33:27, 37:1, 37:6, 37:29, 42:25, 51:21, 52:5, 52:11, 52:25, 53:9, 53:24, 54:1, 54:20, 55:2, 55:10, 55:19, 56:21, 57:9, 59:28, 79:19, 80:18, 82:22, 83:6, 85:9, 92:20, 98:21, 127:18, 132:17, 156:27, 157:1, 159:15, 160:14, 160:15, 161:27, 162:4, 163:20, 164:5, 165:8, 165:29, 166:5, 169:9, 169:26, 170:8, 170:24, 172:28, 180:15, 181:1, 185:22, 186:4, 186:14, 188:7</p> <p>seeing [2] - 83:9, 84:9</p> <p>seek [6] - 11:23, 26:26, 57:7, 136:2, 142:27, 172:8</p> <p>seeking [6] - 42:18, 53:2, 64:11, 85:2, 95:27, 111:28</p> <p>seem [11] - 17:16, 62:12, 83:4, 88:3, 89:13, 99:29, 102:27, 103:7, 108:1, 136:16, 160:7</p> <p>seized [4] - 20:22, 101:12, 115:15</p> <p>seizure [1] - 88:16</p> <p>selected [2] - 180:24, 181:29</p> <p>self [2] - 42:16, 63:1</p> <p>self-identify [1] - 63:1</p> <p>sell [1] - 42:20</p> <p>send [4] - 51:6, 75:28, 85:1, 115:2</p> <p>sending [7] - 49:20, 76:25, 78:3, 78:6,</p>
S				
<p>sadly [1] - 183:24</p> <p>safely [1] - 71:16</p> <p>SAINT [2] - 3:8, 3:13</p> <p>saltiness [1] - 113:8</p> <p>sanctions [1] - 163:20</p> <p>sat [1] - 139:14</p> <p>satchel [7] - 32:2, 32:4, 32:5, 32:28, 33:5, 34:16, 35:7</p> <p>satisfactory [1] - 195:24</p> <p>Saturday [7] - 13:19, 13:23, 57:23, 58:1, 58:2, 59:2, 59:18</p> <p>saw [8] - 7:13, 10:27, 37:5, 79:17, 82:14, 84:6, 87:23, 178:19</p> <p>SC [13] - 2:6, 2:6, 2:9, 2:10, 2:14, 2:15, 2:15, 2:22, 3:1, 3:5, 3:28, 4:6, 4:19</p> <p>scale [1] - 67:17</p> <p>screen [10] - 28:12, 28:13, 123:13, 126:24, 159:6, 159:10, 159:23, 159:26, 160:6, 177:18</p> <p>sea [1] - 196:24</p> <p>SEAN [2] - 2:11, 3:1</p> <p>SEANAD [1] - 1:6</p> <p>seat [1] - 34:16</p> <p>SEBASTIAN [1] - 3:16</p> <p>second [14] - 22:28, 23:6, 23:11, 24:2, 24:3, 24:16, 25:18, 25:20, 29:27, 30:29, 90:27, 105:29, 117:6, 162:7</p> <p>secondly [2] - 62:25, 173:10</p> <p>seconds [1] - 39:14</p>				

<p>78:7, 78:14, 82:27 senior [9] - 31:29, 35:12, 36:17, 68:14, 85:21, 131:11, 131:13, 135:20, 164:19 sense [5] - 42:4, 107:20, 115:3, 115:26, 131:17 sensible [1] - 139:21 sensitive [1] - 46:1 sent [23] - 10:28, 76:6, 76:11, 76:27, 77:2, 78:19, 90:1, 90:4, 90:12, 90:18, 90:24, 90:28, 107:18, 110:13, 118:1, 119:22, 142:26, 157:13, 158:8, 167:3, 167:10, 169:29, 191:21 sentence [3] - 132:26, 133:28, 162:15 separate [1] - 15:17 separately [1] - 90:18 separation [1] - 162:28 September [13] - 15:11, 15:21, 16:10, 16:17, 17:5, 18:8, 23:13, 51:28, 54:1, 54:14, 54:23, 78:27, 118:18 September/October [1] - 42:26 sequence [2] - 26:21, 40:8 sequencing [1] - 25:6 sergeant [1] - 109:11 Sergeant [173] - 15:20, 15:28, 17:11, 18:8, 22:18, 23:27, 24:25, 26:14, 26:23, 27:26, 27:29, 29:5, 33:25, 36:5, 38:13, 38:28, 41:17, 42:18, 42:20, 44:29, 45:1, 45:12, 45:17, 45:18, 45:19, 45:25, 46:5, 46:13, 46:20, 46:23, 49:4, 53:1, 53:9, 53:11, 53:18, 53:25, 54:3, 54:14, 54:24, 55:2, 55:6, 70:8, 72:8, 76:9, 76:11, 84:25, 85:14, 85:16, 109:1,</p>	<p>117:1, 117:17, 117:19, 117:27, 118:3, 118:6, 118:12, 118:13, 119:21, 119:24, 120:1, 120:23, 121:22, 122:8, 122:17, 122:21, 122:29, 123:1, 123:6, 123:15, 123:19, 123:22, 124:1, 126:3, 126:8, 128:2, 128:6, 128:22, 130:1, 130:15, 131:22, 132:3, 134:2, 135:15, 135:27, 136:17, 137:5, 138:2, 138:18, 138:22, 138:24, 138:26, 139:12, 140:4, 140:13, 141:9, 141:22, 142:2, 142:16, 142:18, 142:21, 142:26, 143:6, 144:18, 144:22, 144:25, 146:18, 147:7, 148:1, 148:10, 148:21, 148:29, 151:8, 152:17, 152:29, 154:7, 154:11, 154:15, 156:29, 157:8, 157:17, 159:4, 163:1, 164:25, 166:6, 166:28, 167:11, 167:18, 167:22, 168:6, 168:16, 168:20, 168:24, 169:8, 169:11, 169:23, 169:29, 170:9, 173:6, 173:12, 173:22, 176:22, 179:9, 180:28, 182:17, 185:2, 185:11, 185:26, 186:6, 187:23, 188:16, 188:18, 188:22, 189:6, 189:15, 191:13, 191:26, 191:29, 192:2, 192:6, 192:28, 193:2, 193:5, 193:15, 193:24, 193:25, 194:21, 196:8, 196:14 series [4] - 94:24, 117:29, 128:1, 142:25 serious [2] - 128:17, 131:5 seriously [2] - 127:22, 145:21 seriousness [1] - 134:4</p>	<p>serve [1] - 110:19 SERVICES [1] - 1:30 Services [1] - 1:25 servicing [2] - 46:1, 100:19 session [1] - 40:14 set [8] - 17:23, 39:27, 41:2, 64:9, 64:28, 156:20, 165:9, 165:21 sets [1] - 167:18 setting [2] - 36:17, 38:8 seven [1] - 165:21 severely [1] - 9:3 sexual [10] - 46:14, 49:3, 107:29, 108:6, 108:7, 144:17, 145:3, 145:16, 149:2 SGT [1] - 2:9 SHANE [1] - 2:14 shape [3] - 147:6, 186:11, 188:14 shared [2] - 18:6, 178:18 SHATTER [4] - 4:19, 4:20, 5:12, 116:18 Shatter [40] - 116:10, 116:13, 116:14, 116:24, 119:13, 132:20, 140:17, 156:28, 157:10, 157:21, 157:27, 159:2, 160:8, 163:7, 163:15, 165:29, 166:3, 166:10, 166:15, 167:24, 170:5, 172:21, 173:25, 174:15, 174:28, 175:28, 176:27, 177:25, 178:11, 178:14, 180:23, 182:26, 184:3, 184:21, 184:26, 187:15, 191:11, 194:8, 196:29, 197:1 Shatter's [1] - 116:20 shield [1] - 42:13 SHIP [1] - 2:19 shocking [1] - 162:2 shoes [1] - 139:28 short [9] - 50:9, 75:8, 82:29, 83:1, 122:8, 156:26, 179:3, 184:25, 196:19 shortly [4] - 49:23, 58:8, 150:7, 178:29 show [2] - 91:2, 114:21</p>	<p>shown [1] - 70:26 shows [1] - 89:18 shows" [1] - 172:14 sick [1] - 171:7 side [3] - 59:15, 81:11, 86:27 sideways [1] - 111:8 sign [1] - 29:16 signed [3] - 31:6, 40:19, 123:20 significance [1] - 157:15 significant [4] - 46:21, 47:23, 164:6, 164:12 silence [1] - 93:20 similar [3] - 17:16, 144:20, 196:14 similarly [1] - 163:2 SIMON [2] - 3:21, 3:21 simple [4] - 32:9, 139:16, 165:18, 186:11 simpler [1] - 167:8 simplest [2] - 96:10, 151:21 simply [16] - 40:25, 43:10, 43:17, 54:8, 57:26, 58:23, 59:15, 61:3, 64:17, 65:29, 139:25, 144:3, 173:7, 174:23, 180:8, 185:17 single [4] - 41:24, 112:15, 129:14, 148:27 sinister [1] - 46:12 sinking [1] - 146:25 Sinn [1] - 162:22 Siochana [1] - 141:7 sitting [1] - 34:17 situation [6] - 8:22, 12:2, 78:17, 92:12, 110:18, 132:23 six [1] - 77:9 skeptical [1] - 156:10 skills [2] - 26:28, 76:16 Skylon [1] - 27:15 slanderous [1] - 154:8 slate [1] - 104:22 slightly [4] - 34:20, 67:15, 188:26, 194:26 small [1] - 187:27 smear [12] - 18:7, 19:17, 20:3, 20:7, 22:16, 25:8, 41:25, 43:9, 51:21, 103:13,</p>	<p>103:14, 107:11 SMITHFIELD [1] - 2:29 smoke [3] - 108:1, 108:9, 109:22 sniff [1] - 108:22 social [3] - 10:6, 10:18, 180:12 SOLE [2] - 1:12, 2:2 solicitor [9] - 63:23, 66:10, 88:5, 89:2, 89:4, 93:22, 98:22, 110:5, 177:18 SOLICITOR [1] - 2:7 SOLICITOR'S [1] - 2:18 SOLICITORS [9] - 2:24, 2:28, 3:6, 3:11, 3:21, 3:29, 4:3, 4:10, 4:20 solicitors [10] - 71:26, 73:6, 73:13, 74:24, 116:14, 117:20, 117:28, 123:27, 142:26, 185:14 solo [1] - 38:12 someone [12] - 60:11, 101:17, 129:26, 145:13, 149:16, 152:2, 156:2, 180:11, 182:1, 182:3, 182:5, 182:22 sometime [4] - 51:24, 131:28, 168:15, 185:15 sometimes [1] - 114:7 somewhat [4] - 67:16, 146:27, 149:9, 152:14 somewhere [1] - 52:26 Song [1] - 59:24 soon [1] - 84:16 sorry [36] - 7:26, 10:13, 18:12, 19:2, 21:16, 21:25, 28:10, 28:15, 31:9, 49:14, 50:24, 58:2, 60:18, 60:20, 60:22, 80:21, 82:8, 84:17, 93:7, 120:27, 159:9, 159:18, 161:2, 166:1, 174:16, 174:24, 175:2, 177:4, 177:19, 181:4, 184:9, 185:7, 187:2, 193:24 sort [9] - 10:18, 38:12, 46:15, 80:8,</p>
---	--	---	--	--

<p>103:5, 121:5, 146:6, 146:25, 154:6</p> <p>sorts [5] - 148:20, 180:3, 180:5, 180:12, 182:20</p> <p>sought [14] - 12:17, 12:21, 24:23, 46:19, 64:1, 70:4, 70:11, 142:5, 143:10, 162:10, 167:28, 168:10, 169:8, 173:8</p> <p>sounding [2] - 6:28, 185:9</p> <p>source [4] - 61:21, 62:29, 87:7, 137:1</p> <p>space [2] - 53:22, 196:19</p> <p>spatially [2] - 32:11, 32:13</p> <p>speaker [1] - 160:14</p> <p>speaking [11] - 11:5, 46:26, 59:22, 59:24, 67:13, 70:8, 117:3, 166:19, 169:28, 170:27, 176:6</p> <p>special [2] - 146:3, 177:8</p> <p>specialise [1] - 146:4</p> <p>specific [8] - 8:13, 9:24, 45:8, 45:10, 63:16, 89:12, 121:29, 156:20</p> <p>specifically [6] - 122:28, 125:20, 126:6, 132:5, 140:1, 188:14</p> <p>specifics [1] - 41:5</p> <p>speculated [1] - 144:22</p> <p>speech [1] - 165:8</p> <p>speed [2] - 44:23, 196:5</p> <p>splashed [1] - 96:14</p> <p>spoken [6] - 40:5, 58:8, 64:14, 67:20, 74:2, 118:20</p> <p>Spokesperson [1] - 180:5</p> <p>spot [2] - 66:13, 112:28</p> <p>Spotlight [1] - 174:18</p> <p>SPS [1] - 192:23</p> <p>Square [3] - 68:6, 68:23, 69:3</p> <p>SQUARE [1] - 4:11</p> <p>squarely [1] - 43:7</p> <p>stage [30] - 37:27, 52:19, 53:19, 54:6, 62:5, 62:28, 64:7,</p>	<p>64:26, 65:6, 65:7, 73:8, 83:10, 91:10, 91:29, 99:9, 104:3, 121:2, 127:3, 129:7, 130:14, 131:27, 132:1, 138:25, 142:14, 147:18, 150:29, 157:28, 158:15, 188:23, 189:21</p> <p>stand [5] - 32:1, 140:19, 141:22, 147:16, 192:23</p> <p>standard [1] - 51:6</p> <p>Standards [1] - 196:18</p> <p>standards [2] - 112:26, 120:9</p> <p>standing [2] - 32:29, 113:15</p> <p>stands [1] - 141:20</p> <p>start [1] - 95:16</p> <p>started [2] - 121:2, 162:29</p> <p>starts [2] - 31:10, 189:1</p> <p>STATE [1] - 2:18</p> <p>state [4] - 75:15, 103:17, 153:15, 183:4</p> <p>State [1] - 63:7</p> <p>statement [87] - 10:4, 28:16, 28:18, 29:12, 29:16, 29:24, 29:25, 29:27, 30:4, 31:1, 31:5, 31:8, 31:14, 34:3, 37:16, 39:27, 40:10, 40:16, 48:17, 70:10, 70:15, 70:25, 72:22, 72:29, 73:3, 73:13, 75:12, 75:28, 76:2, 90:11, 90:27, 116:20, 130:27, 131:1, 131:15, 132:14, 132:19, 135:12, 135:14, 135:17, 135:19, 136:7, 136:16, 136:19, 136:26, 136:29, 137:20, 138:5, 138:20, 140:5, 140:25, 140:27, 141:5, 145:7, 158:1, 163:23, 163:26, 166:5, 166:7, 166:10, 169:6, 170:5, 170:6, 170:7, 170:10, 170:12, 170:27, 171:5, 171:25, 172:2, 172:23, 173:5, 173:8,</p>	<p>174:3, 174:15, 174:28, 174:29, 175:4, 175:10, 185:22, 186:14, 188:10, 188:28, 191:9, 191:12, 191:18, 195:13</p> <p>statements [12] - 28:18, 28:22, 28:24, 28:29, 30:23, 48:22, 98:23, 134:9, 137:23, 140:19, 188:5, 188:8</p> <p>stating [1] - 71:27</p> <p>station [1] - 189:14</p> <p>Station [1] - 171:21</p> <p>statistics [1] - 147:26</p> <p>stenographic [1] - 1:27</p> <p>STENOGRAPHY [1] - 1:30</p> <p>stenography [1] - 1:25</p> <p>step [1] - 55:17</p> <p>stick [3] - 34:1, 34:13, 36:13</p> <p>sticking [1] - 125:11</p> <p>still [13] - 12:9, 35:20, 58:9, 58:10, 83:12, 93:3, 98:28, 109:1, 123:4, 134:21, 181:21, 190:18</p> <p>stood [1] - 143:8</p> <p>stop [2] - 75:27, 84:2</p> <p>stopped [2] - 149:5, 162:29</p> <p>stopping [2] - 55:22, 113:26</p> <p>story [19] - 31:26, 32:16, 32:25, 33:28, 33:29, 34:2, 34:5, 34:10, 34:14, 41:25, 88:17, 88:18, 109:14, 151:18, 152:15, 174:5, 181:8</p> <p>straight [1] - 53:23</p> <p>straightaway' [1] - 56:20</p> <p>straightforward [3] - 115:25, 174:13, 186:12</p> <p>strands [1] - 116:29</p> <p>strange [1] - 143:11</p> <p>stream [1] - 153:27</p> <p>STREET [7] - 2:19, 2:25, 2:29, 3:7, 3:12, 3:22, 4:16</p> <p>Street [3] - 34:7, 34:19, 34:26</p> <p>stress [4] - 152:11,</p>	<p>153:1, 153:4, 155:24</p> <p>stressed [2] - 152:11, 152:14</p> <p>strictly [1] - 156:23</p> <p>strike [1] - 44:23</p> <p>strong [1] - 42:4</p> <p>structures [2] - 46:5, 57:6</p> <p>study [1] - 153:2</p> <p>stuff [5] - 75:10, 109:24, 152:28, 181:22, 181:24</p> <p>style [5] - 35:16, 35:17, 47:8, 47:9, 47:10</p> <p>subject [6] - 131:11, 137:9, 149:6, 163:13, 163:20, 164:5</p> <p>subject-matter [3] - 137:9, 163:13, 164:5</p> <p>submission [1] - 145:6</p> <p>submissions [5] - 62:6, 63:29, 64:5, 125:25, 148:15</p> <p>submitted [2] - 192:19, 193:15</p> <p>submitting [1] - 57:3</p> <p>subscribe [1] - 27:1</p> <p>subsequent [5] - 6:11, 129:8, 129:9, 131:28, 188:9</p> <p>subsequently [5] - 14:18, 117:28, 144:13, 145:5, 169:16</p> <p>substance [1] - 196:1</p> <p>substantial [3] - 122:23, 136:24, 164:16</p> <p>substantially [1] - 148:22</p> <p>substantiated [1] - 165:17</p> <p>substantiating [1] - 41:7</p> <p>substantive [4] - 85:20, 120:14, 131:14, 133:2</p> <p>succeeding [1] - 82:4</p> <p>suddenly [1] - 96:14</p> <p>suffered [1] - 196:13</p> <p>suggest [14] - 8:11, 9:22, 9:23, 13:5, 15:28, 37:29, 38:18, 41:3, 46:18, 71:13, 91:9, 100:23, 169:5, 185:27</p> <p>suggested [4] -</p>	<p>58:18, 136:5, 170:13, 172:11</p> <p>suggesting [33] - 8:27, 8:29, 11:29, 12:5, 12:12, 13:14, 14:29, 19:26, 20:5, 26:11, 29:14, 29:15, 30:18, 31:2, 31:6, 33:29, 35:18, 41:5, 41:10, 41:16, 41:23, 42:6, 42:12, 42:14, 42:23, 44:12, 44:24, 45:27, 47:1, 47:7, 47:10, 47:14, 169:10</p> <p>suggestion [7] - 12:20, 32:23, 76:18, 130:12, 155:26, 163:9, 186:9</p> <p>suggestions [2] - 164:3, 183:10</p> <p>suggests [1] - 171:5</p> <p>suitable [1] - 104:17</p> <p>summarise [1] - 152:7</p> <p>summarises [1] - 132:22</p> <p>summer [11] - 17:28, 23:1, 25:28, 26:6, 26:8, 53:16, 53:28, 106:12, 118:16, 167:1</p> <p>summing [1] - 127:17</p> <p>Sunday [4] - 82:8, 82:11, 82:23, 82:28</p> <p>SUNLIGHT [1] - 2:24</p> <p>superintendent [18] - 60:4, 65:14, 69:20, 70:3, 86:12, 88:14, 89:2, 96:9, 100:19, 104:6, 107:8, 112:28, 114:2, 115:10, 130:7, 139:4, 168:13, 184:27</p> <p>SUPERINTENDENT [2] - 5:3, 6:4</p> <p>Superintendent [71] - 6:7, 14:13, 15:18, 19:21, 21:3, 27:3, 28:5, 28:22, 29:15, 29:25, 30:2, 38:1, 38:26, 40:23, 41:4, 44:25, 48:7, 48:15, 50:8, 55:10, 57:4, 57:13, 57:15, 57:16, 57:21, 57:24, 57:29, 58:13, 58:19, 58:25, 59:4, 59:10, 59:13, 60:9, 61:18, 61:19, 62:4, 63:18, 64:16, 64:17, 64:24, 66:23, 67:2, 67:4, 71:8,</p>
--	---	---	---	--

<p>71:23, 71:28, 76:24, 89:19, 90:1, 90:4, 90:10, 90:27, 91:3, 100:9, 100:20, 101:7, 101:27, 112:6, 113:26, 120:16, 121:11, 122:22, 122:26, 130:8, 131:6, 138:21, 147:22, 171:22, 171:26, 192:13</p> <p>superintendents [2] - 88:4, 103:26</p> <p>superiors [1] - 171:28</p> <p>supplied [1] - 120:25</p> <p>supply [1] - 166:14</p> <p>support [1] - 41:25</p> <p>supported [1] - 138:3</p> <p>supporting [1] - 63:18</p> <p>suppose [14] - 56:29, 91:29, 99:21, 106:2, 113:4, 114:11, 115:3, 115:19, 117:12, 118:10, 136:15, 152:14, 193:23</p> <p>supposed [1] - 108:5</p> <p>supposing [2] - 38:18, 83:26</p> <p>SUPREME [2] - 1:13, 2:3</p> <p>SUPT [1] - 2:22</p> <p>surely [1] - 39:7</p> <p>surprised [1] - 76:15</p> <p>surprises [1] - 157:18</p> <p>surrounded [2] - 147:25, 152:16</p> <p>surrounding [1] - 70:7</p> <p>suspect [1] - 189:15</p> <p>suspected [4] - 139:26, 151:4, 151:7, 168:16</p> <p>suspended [1] - 91:22</p> <p>suspension [2] - 6:11, 6:23</p> <p>suspicion [4] - 101:4, 101:10, 140:10, 189:24</p> <p>suspicious [2] - 189:5, 194:22</p> <p>SWORN [1] - 116:18</p> <p>sworn [2] - 82:16, 95:8</p> <p>sympathetically [1] -</p>	<p>185:26</p> <p>sympathy [1] - 111:28</p> <p>synopsis [1] - 86:8</p> <p>system [27] - 70:13, 104:28, 105:2, 114:23, 126:26, 127:1, 127:2, 128:9, 128:20, 134:27, 134:29, 135:3, 138:1, 138:6, 143:18, 159:20, 164:17, 164:29, 165:23, 165:28, 168:19, 174:10, 174:19, 175:12, 175:25, 176:2, 196:26</p> <p>system [1] - 159:16</p> <p>systematic [1] - 95:27</p> <p>systems [1] - 114:22</p> <p>Síochána [19] - 45:21, 46:28, 48:26, 49:1, 51:28, 52:1, 69:17, 118:22, 120:13, 132:29, 164:11, 169:11, 171:1, 174:11, 175:29, 187:16, 190:2, 190:5, 196:19</p>	<p>50:8, 55:10, 57:4, 57:13, 57:16, 57:22, 57:24, 57:29, 58:13, 58:14, 58:19, 58:25, 59:4, 59:10, 60:9, 61:19, 61:29, 62:4, 62:9, 63:18, 64:17, 65:24, 65:27, 67:3, 67:4, 71:8, 71:23, 71:28, 75:16, 75:20, 75:27, 76:24, 101:27, 147:22, 184:27</p> <p>Taylor's [2] - 57:15, 59:13</p> <p>TD [3] - 132:20, 155:9, 181:22</p> <p>TDs [2] - 121:26, 129:12</p> <p>tea [2] - 147:24, 148:2</p> <p>team [16] - 19:11, 105:27, 122:23, 122:24, 130:11, 136:8, 136:12, 143:13, 157:19, 170:22, 191:14, 192:7, 192:21, 192:26, 193:1, 193:11</p> <p>technical [1] - 79:9</p> <p>teenager [1] - 152:22</p> <p>telephone [1] - 67:9</p> <p>telephoned [1] - 59:3</p> <p>television [1] - 39:1</p> <p>Templemore [1] - 147:27</p> <p>temporal [1] - 40:8</p> <p>ten [1] - 197:3</p> <p>tennis [1] - 70:23</p> <p>tens [1] - 192:23</p> <p>tenure [1] - 69:17</p> <p>terminated [2] - 121:29, 130:13</p> <p>termination [1] - 121:19</p> <p>terminations [1] - 196:13</p> <p>terminology [5] - 35:14, 35:16, 35:17, 35:18, 108:11</p> <p>terms [22] - 8:10, 25:7, 27:22, 50:12, 52:18, 53:9, 53:13, 55:17, 56:5, 71:4, 81:7, 105:5, 142:10, 153:1, 156:20, 156:24, 156:25, 156:29, 165:7, 172:3, 183:6, 186:13</p> <p>TERRACE [1] - 4:4</p> <p>testimony [1] - 22:13</p>	<p>text [11] - 13:13, 23:26, 49:20, 78:10, 83:1, 83:2, 89:25, 90:4, 115:1, 115:23, 126:22</p> <p>texted [2] - 50:29, 51:14</p> <p>texts [27] - 10:28, 23:26, 41:6, 41:12, 51:6, 76:6, 76:7, 76:8, 76:11, 76:25, 76:27, 77:2, 77:21, 77:22, 78:3, 78:8, 78:14, 78:19, 78:20, 79:2, 82:5, 82:27, 88:27, 90:1, 115:2, 115:13, 115:26</p> <p>that'll [1] - 44:22</p> <p>THE [27] - 1:4, 1:8, 1:9, 1:12, 2:3, 2:6, 2:14, 3:25, 3:29, 4:1, 4:2, 5:10, 6:1, 48:12, 50:6, 67:1, 70:1, 71:20, 107:5, 116:5, 116:8, 159:1, 184:24, 187:14, 194:16, 197:6</p> <p>themselves [1] - 189:22</p> <p>THEN [6] - 107:5, 116:5, 159:1, 184:24, 187:14, 197:6</p> <p>there'd [4] - 69:7, 130:19, 194:7, 196:23</p> <p>There'd [1] - 85:8</p> <p>thereafter [2] - 105:8, 125:11</p> <p>thereby [1] - 115:24</p> <p>therefore [6] - 18:4, 23:11, 96:6, 98:4, 137:17, 189:11</p> <p>thinking [3] - 88:26, 150:11, 158:10</p> <p>thinks [1] - 114:12</p> <p>THIRD [1] - 4:15</p> <p>third [4] - 24:23, 124:16, 191:18, 193:10</p> <p>thorough [2] - 195:24, 195:27</p> <p>thoughts [1] - 8:6</p> <p>thousands [1] - 77:21</p> <p>threat [1] - 188:13</p> <p>three [9] - 7:6, 11:25, 12:1, 23:24, 83:28, 131:11, 154:23, 180:16</p> <p>throughout [5] - 62:8, 64:4, 117:16, 138:24, 179:27</p>	<p>THULLIER [1] - 3:10</p> <p>THURSDAY [2] - 1:18, 6:1</p> <p>ticket [22] - 117:15, 118:2, 118:13, 121:20, 121:28, 127:14, 127:29, 128:7, 131:4, 133:22, 134:12, 135:7, 141:6, 143:7, 143:18, 147:29, 148:20, 165:23, 168:27, 196:9, 196:12, 196:24</p> <p>tie [3] - 12:27, 32:5, 148:13</p> <p>tied [2] - 35:1, 35:26</p> <p>TIM [1] - 3:27</p> <p>timeframe [1] - 196:12</p> <p>TIMES [3] - 3:20, 4:1, 4:2</p> <p>timescale [1] - 71:4</p> <p>timing [1] - 101:2</p> <p>title [2] - 68:13, 68:14</p> <p>to' [1] - 181:16</p> <p>today [6] - 35:20, 60:6, 94:17, 107:14, 137:25, 172:2</p> <p>today's [1] - 137:9</p> <p>together [1] - 141:20</p> <p>tolerated [1] - 43:17</p> <p>Tom [1] - 69:13</p> <p>tomorrow [1] - 197:3</p> <p>took [27] - 30:14, 39:7, 75:15, 75:23, 93:23, 101:24, 122:6, 127:11, 127:15, 129:4, 136:28, 137:19, 139:5, 144:24, 145:1, 145:25, 152:7, 153:13, 177:9, 177:10, 177:26, 181:10, 181:13, 183:13, 183:14, 184:17, 186:14</p> <p>tool [1] - 145:21</p> <p>top [6] - 45:4, 51:12, 123:15, 132:25, 161:13, 161:16</p> <p>Topic [1] - 159:15</p> <p>topic [3] - 75:11, 87:27, 136:25</p> <p>topical [1] - 159:19</p> <p>topics [4] - 85:3, 85:5, 152:8</p> <p>totality [2] - 96:5, 141:5</p> <p>totally [3] - 24:17,</p>
T				
<p>tab [1] - 84:18</p> <p>table [1] - 88:15</p> <p>Tallaght [1] - 92:26</p> <p>tally [1] - 25:26</p> <p>tangent [1] - 47:24</p> <p>tangential [1] - 43:23</p> <p>Taoiseach [6] - 130:11, 132:1, 143:12, 154:2, 154:17, 156:2</p> <p>Taoiseach's [9] - 118:14, 130:2, 167:1, 169:24, 169:27, 170:1, 170:2, 193:26</p> <p>tapes [2] - 43:27, 56:13</p> <p>Tara [1] - 184:26</p> <p>TARA [1] - 2:22</p> <p>targeted [3] - 42:5, 96:25, 97:9</p> <p>tasked [2] - 109:8, 189:20</p> <p>TAYLOR [4] - 2:22, 4:6, 5:3, 6:4</p> <p>Taylor [40] - 30:12, 40:23, 48:7, 48:15,</p>				

<p>140:18, 195:13 touch [1] - 89:19 towards [10] - 12:6, 23:1, 78:4, 78:14, 121:10, 138:29, 141:1, 173:20, 185:26, 191:11 tracks [1] - 113:27 traffic [1] - 134:11 trail [1] - 71:12 training [1] - 145:2 transcend [2] - 180:17 transcript [13] - 1:26, 13:28, 14:7, 15:10, 21:3, 57:18, 95:8, 139:1, 139:7, 139:9, 157:27, 161:20, 169:17 transferred [2] - 7:1, 79:2 transparent [1] - 143:17 transpired [2] - 54:13, 171:24 transpires [1] - 86:11 Transport [5] - 118:15, 125:15, 125:28, 167:1, 167:4 traumatic [1] - 102:28 traumatised [1] - 151:23 travelling [1] - 35:6 traverse [1] - 61:23 treat [3] - 145:24, 188:5, 190:18 treated [2] - 7:13, 179:27 Tribunal [58] - 6:9, 16:12, 19:22, 20:2, 28:19, 31:3, 39:26, 40:1, 40:17, 41:2, 41:27, 47:16, 47:23, 47:25, 47:27, 48:16, 48:18, 49:15, 49:18, 50:23, 57:3, 63:23, 63:26, 70:10, 71:26, 72:3, 72:5, 72:12, 72:14, 72:23, 72:29, 74:10, 75:1, 75:6, 75:7, 76:2, 76:3, 76:23, 82:13, 98:23, 112:19, 116:20, 116:24, 118:24, 120:25, 142:23, 148:7, 148:14, 158:2, 158:4, 158:12, 158:23, 159:4, 177:7,</p>	<p>183:29, 187:21, 188:28, 193:29 TRIBUNAL [2] - 1:3, 2:6 Tribunal's [4] - 57:12, 57:20, 64:29, 65:4 TRIBUNALS [1] - 1:9 tried [2] - 117:9, 152:18 trips [1] - 74:2 trouble [1] - 73:7 truck [3] - 43:8, 43:11, 43:16 true [13] - 7:2, 7:3, 24:8, 24:10, 24:22, 56:29, 83:26, 114:5, 136:7, 142:4, 145:19, 174:5, 192:12 trumped [6] - 17:2, 17:3, 17:7, 75:16, 75:21, 75:24 TRUST [1] - 4:2 truth [11] - 47:28, 55:1, 63:4, 92:13, 142:5, 147:8, 164:15, 165:4, 165:14, 165:27, 167:23 truthful [4] - 14:14, 14:16, 163:18, 163:29 truthfully [2] - 142:25, 143:16 try [6] - 29:29, 83:28, 123:3, 139:27, 145:22, 195:22 trying [20] - 44:19, 83:4, 85:12, 95:2, 97:1, 97:25, 123:27, 128:24, 131:5, 142:26, 146:16, 146:26, 154:6, 154:7, 154:8, 163:7, 167:12, 167:21, 167:22, 185:12 Tuesday [2] - 68:23, 95:14 turn [6] - 61:6, 75:11, 117:23, 124:8, 132:25, 165:29 turned [11] - 32:3, 32:12, 32:28, 32:29, 33:14, 35:8, 128:20, 158:11 Tusla [7] - 70:6, 70:11, 70:17, 70:20, 71:5, 71:6 twice [1] - 184:4 two [33] - 6:27, 12:19, 17:28, 26:3, 28:18, 28:22, 28:29,</p>	<p>29:12, 38:27, 45:14, 51:6, 53:26, 62:24, 73:17, 74:6, 79:22, 80:27, 81:28, 81:29, 85:24, 88:23, 100:16, 114:1, 114:3, 116:29, 141:20, 146:4, 154:23, 160:21, 165:12, 167:18, 173:7, 180:16 Twomey [5] - 68:7, 68:23, 68:26, 68:27, 69:9 type [3] - 36:10, 36:26, 181:15 typed [2] - 177:11</p>	<p>117:28, 119:5, 123:28, 128:15, 128:24, 130:21, 145:20, 147:28, 174:4 unhappiness [1] - 7:1 unheaded [1] - 170:12 unhindered [1] - 124:14 Unit [1] - 196:18 unjustly [3] - 17:2, 17:6, 97:9 unless [2] - 37:21, 159:28 unnecessarily [1] - 185:13 unplanned [1] - 132:11 unpleasant [2] - 182:17, 182:19 unsolicited [1] - 81:5 unsubstantiated [2] - 128:21, 134:22 UNTIL [1] - 197:6 untrue [3] - 127:27, 128:28, 163:11 unusual [2] - 34:21, 180:10 up [72] - 6:8, 9:29, 11:8, 11:11, 13:7, 17:2, 17:3, 17:7, 20:4, 23:21, 26:27, 28:3, 28:12, 29:16, 31:6, 32:1, 37:27, 38:4, 38:22, 39:27, 40:19, 41:2, 42:8, 42:12, 44:23, 47:4, 51:9, 54:17, 61:4, 61:6, 61:16, 65:3, 70:26, 71:11, 71:24, 74:11, 75:12, 75:16, 75:21, 75:24, 80:19, 81:22, 82:9, 84:14, 84:16, 85:15, 86:5, 87:18, 98:7, 100:2, 120:28, 122:15, 123:13, 126:23, 127:17, 130:16, 132:10, 133:17, 143:8, 148:2, 148:19, 149:2, 149:14, 154:22, 158:22, 159:6, 159:10, 168:25, 169:1, 174:26, 181:15 update [1] - 51:14 updates [3] - 50:18, 78:16, 78:17 uphold [2] - 164:26, 164:27</p>	<p>UPPER [1] - 4:21 upset [9] - 137:1, 137:24, 140:13, 144:22, 147:4, 151:26, 185:28 urge [1] - 122:20 urging [1] - 167:11 uses [2] - 47:11, 145:22 usual [1] - 30:9 uttered [1] - 27:26</p>
V				
<p>vague [1] - 41:4 valid [4] - 128:16, 131:22, 134:21, 195:14 valuable [2] - 128:22, 196:20 Varadkar [4] - 125:14, 125:27, 163:1, 167:3 various [6] - 17:5, 72:5, 119:21, 127:1, 161:15, 180:4 variously [1] - 119:3 vast [1] - 145:19 VAUGHAN [1] - 3:27 vehemently [1] - 172:27 venting [2] - 7:7, 11:5 verbatim [1] - 1:26 verse [1] - 128:29 version [3] - 30:18, 40:19, 106:19 victim [1] - 42:17 victimised [2] - 127:5, 127:19 view [23] - 11:21, 17:9, 45:19, 46:8, 57:24, 63:18, 64:21, 66:1, 74:16, 98:15, 101:18, 129:13, 129:23, 129:25, 129:26, 129:28, 130:24, 131:24, 145:1, 148:10, 165:10, 196:3 views [2] - 129:28, 137:13 vindicated [1] - 151:25 virtue [1] - 176:16 vis-à-vis [4] - 44:13, 66:5, 99:26 visit [12] - 7:5, 10:6, 12:1, 61:16, 81:8,</p>				

<p>82:17, 130:18, 142:23, 176:28, 177:2, 178:11, 178:24 visited [1] - 11:10 visits [4] - 10:23, 10:26, 11:25, 74:1 vocabulary [2] - 36:21, 36:24 vogue [1] - 35:20 voice [3] - 166:2, 185:8, 193:24 Volume [3] - 28:4, 28:8, 75:12 volume [12] - 28:16, 116:21, 116:22, 159:27, 160:1, 160:2, 160:4, 166:1, 174:22, 177:19, 177:21, 188:27 volumes [1] - 16:28 volunteer [1] - 167:13 volunteered [1] - 73:3 volunteering [1] - 88:13 vote [1] - 59:23</p>	<p>178:24, 179:3, 180:16 weird [1] - 185:9 welcomed [3] - 114:25, 164:13, 164:22 well-being [1] - 153:15 Westmeath [1] - 110:16 WHELAN [1] - 2:16 Whelan [1] - 15:10 whereas [3] - 59:11, 70:28, 189:15 whilst [4] - 48:20, 167:24, 179:4, 190:18 whistleblower [2] - 176:20, 188:10 whistleblowers [14] - 127:4, 127:6, 127:16, 136:27, 137:2, 137:14, 137:18, 163:10, 163:17, 163:28, 164:3, 165:12, 166:20, 188:12 white [2] - 142:10, 165:7 whole [12] - 19:28, 38:23, 38:24, 39:3, 39:4, 39:5, 92:13, 131:8, 153:28, 155:19, 164:21, 183:8 wide [1] - 46:28 widespread [2] - 149:20, 162:3 wife [36] - 6:8, 14:1, 14:9, 14:14, 14:16, 14:21, 14:23, 14:24, 14:28, 15:1, 15:3, 15:4, 15:7, 15:8, 15:22, 15:27, 16:1, 16:13, 16:18, 17:27, 18:29, 19:3, 19:13, 21:5, 22:15, 25:24, 26:13, 26:23, 27:20, 52:12, 52:15, 67:13, 67:20, 89:3, 100:1, 156:14 wife's [5] - 15:19, 15:24, 22:13, 22:21, 53:24 wild [1] - 9:1 WILLIAMS [1] - 3:5 Williams [35] - 13:7, 13:20, 57:15, 57:17, 58:3, 58:8, 58:9, 58:11, 58:19, 59:2, 59:3, 59:14, 72:20, 80:7, 80:23, 81:20, 83:3, 83:5, 87:9,</p>	<p>108:19, 150:22, 151:9, 152:4, 154:9, 155:4, 155:9, 155:16, 155:18, 155:27, 177:27, 177:28, 178:15, 179:14, 180:23, 180:26 Williams [6] - 58:21, 79:11, 80:2, 82:7, 82:14, 178:19 willing [2] - 163:4, 195:10 Wilson [10] - 31:23, 31:27, 32:26, 34:6, 34:26, 37:7, 37:14, 138:3, 189:8, 189:15 wiped [4] - 20:23, 67:8, 79:5, 115:18 wisdom [1] - 141:28 wise [3] - 139:21, 150:14, 195:7 wish [17] - 9:22, 13:4, 22:23, 37:29, 40:24, 46:18, 60:8, 63:17, 63:19, 64:5, 64:8, 64:18, 65:4, 67:5, 137:17, 140:13, 167:9 wished [10] - 67:28, 119:26, 123:4, 123:10, 130:18, 130:25, 150:24, 153:17, 174:12, 178:1 wishes [2] - 49:26, 188:7 withdraw [1] - 137:22 withheld [2] - 136:3, 172:9 WITNESS [11] - 5:2, 48:12, 50:6, 67:1, 70:1, 71:20, 107:5, 159:1, 184:24, 187:14, 194:16 witness [12] - 29:28, 55:28, 60:4, 61:12, 62:10, 64:13, 65:10, 65:19, 65:20, 71:28, 116:10, 157:8 Witness [2] - 30:1, 44:24 woman [3] - 145:6, 151:10, 183:18 wonder [5] - 26:15, 28:3, 69:23, 70:25, 106:8 wonderful [1] - 110:17 wondering [6] - 16:15, 48:3, 89:12,</p>	<p>114:29, 140:17, 167:27 word [13] - 7:8, 29:11, 38:23, 38:24, 39:4, 39:18, 56:28, 71:10, 102:13, 102:15, 113:5, 158:7, 162:17 wording [2] - 30:3, 175:24 words [13] - 20:10, 32:18, 34:27, 37:22, 46:16, 58:7, 102:8, 133:14, 159:25, 169:12, 184:8, 184:20, 186:1 works [1] - 81:11 world [3] - 42:2, 150:6, 165:4 worried [1] - 113:2 worry [1] - 49:25 worse [1] - 109:20 worth [1] - 115:26 would've [12] - 10:10, 10:11, 10:15, 24:29, 32:7, 36:26, 38:4, 38:8, 38:19, 178:7, 180:18 wriggle [1] - 26:2 write [7] - 59:6, 63:28, 68:17, 72:7, 82:2, 139:29, 195:9 writing [8] - 68:16, 81:23, 81:24, 91:11, 109:1, 119:27, 156:1, 178:15 written [7] - 56:12, 82:21, 144:7, 154:17, 177:10, 181:19, 193:4 wrongfully [1] - 171:3 wrongly [1] - 158:7 wrote [10] - 71:26, 124:26, 131:25, 143:24, 147:17, 154:1, 154:2, 157:28, 169:19, 170:13</p>	<p>144:12, 144:16, 145:14, 182:2, 187:4 yes [1] - 94:1 yesterday [18] - 14:1, 14:8, 15:10, 18:5, 21:4, 25:14, 25:17, 31:28, 47:2, 52:12, 53:25, 61:12, 71:26, 86:7, 87:28, 89:5, 89:9, 97:13 yesterday's [1] - 13:28 young [5] - 145:5, 147:27, 152:10, 152:21, 183:17 yourself [12] - 11:14, 32:5, 42:1, 42:13, 42:16, 42:17, 42:18, 45:2, 74:22, 100:1, 124:3</p>
W				
<p>waived [1] - 61:20 waiver [2] - 62:9, 63:10 walking [1] - 148:18 WALL [1] - 2:28 Wallace [10] - 16:26, 16:27, 17:3, 41:18, 75:27, 76:15, 77:12, 101:24, 106:14, 161:12 Wallace's [1] - 75:12 Walsh [1] - 86:12 wants [1] - 157:3 war [1] - 145:21 warranted [1] - 184:19 WAS [13] - 6:4, 48:12, 50:6, 67:1, 70:1, 71:20, 107:5, 116:18, 159:1, 184:24, 187:14, 194:16, 197:6 watered [1] - 41:11 ways [2] - 117:10, 117:12 weasel [1] - 97:1 week [4] - 57:17, 58:14, 58:20, 59:14 weeks [4] - 77:9,</p>	<p>178:24, 179:3, 180:16 weird [1] - 185:9 welcomed [3] - 114:25, 164:13, 164:22 well-being [1] - 153:15 Westmeath [1] - 110:16 WHELAN [1] - 2:16 Whelan [1] - 15:10 whereas [3] - 59:11, 70:28, 189:15 whilst [4] - 48:20, 167:24, 179:4, 190:18 whistleblower [2] - 176:20, 188:10 whistleblowers [14] - 127:4, 127:6, 127:16, 136:27, 137:2, 137:14, 137:18, 163:10, 163:17, 163:28, 164:3, 165:12, 166:20, 188:12 white [2] - 142:10, 165:7 whole [12] - 19:28, 38:23, 38:24, 39:3, 39:4, 39:5, 92:13, 131:8, 153:28, 155:19, 164:21, 183:8 wide [1] - 46:28 widespread [2] - 149:20, 162:3 wife [36] - 6:8, 14:1, 14:9, 14:14, 14:16, 14:21, 14:23, 14:24, 14:28, 15:1, 15:3, 15:4, 15:7, 15:8, 15:22, 15:27, 16:1, 16:13, 16:18, 17:27, 18:29, 19:3, 19:13, 21:5, 22:15, 25:24, 26:13, 26:23, 27:20, 52:12, 52:15, 67:13, 67:20, 89:3, 100:1, 156:14 wife's [5] - 15:19, 15:24, 22:13, 22:21, 53:24 wild [1] - 9:1 WILLIAMS [1] - 3:5 Williams [35] - 13:7, 13:20, 57:15, 57:17, 58:3, 58:8, 58:9, 58:11, 58:19, 59:2, 59:3, 59:14, 72:20, 80:7, 80:23, 81:20, 83:3, 83:5, 87:9,</p>	<p>108:19, 150:22, 151:9, 152:4, 154:9, 155:4, 155:9, 155:16, 155:18, 155:27, 177:27, 177:28, 178:15, 179:14, 180:23, 180:26 Williams [6] - 58:21, 79:11, 80:2, 82:7, 82:14, 178:19 willing [2] - 163:4, 195:10 Wilson [10] - 31:23, 31:27, 32:26, 34:6, 34:26, 37:7, 37:14, 138:3, 189:8, 189:15 wiped [4] - 20:23, 67:8, 79:5, 115:18 wisdom [1] - 141:28 wise [3] - 139:21, 150:14, 195:7 wish [17] - 9:22, 13:4, 22:23, 37:29, 40:24, 46:18, 60:8, 63:17, 63:19, 64:5, 64:8, 64:18, 65:4, 67:5, 137:17, 140:13, 167:9 wished [10] - 67:28, 119:26, 123:4, 123:10, 130:18, 130:25, 150:24, 153:17, 174:12, 178:1 wishes [2] - 49:26, 188:7 withdraw [1] - 137:22 withheld [2] - 136:3, 172:9 WITNESS [11] - 5:2, 48:12, 50:6, 67:1, 70:1, 71:20, 107:5, 159:1, 184:24, 187:14, 194:16 witness [12] - 29:28, 55:28, 60:4, 61:12, 62:10, 64:13, 65:10, 65:19, 65:20, 71:28, 116:10, 157:8 Witness [2] - 30:1, 44:24 woman [3] - 145:6, 151:10, 183:18 wonder [5] - 26:15, 28:3, 69:23, 70:25, 106:8 wonderful [1] - 110:17 wondering [6] - 16:15, 48:3, 89:12,</p>	<p>114:29, 140:17, 167:27 word [13] - 7:8, 29:11, 38:23, 38:24, 39:4, 39:18, 56:28, 71:10, 102:13, 102:15, 113:5, 158:7, 162:17 wording [2] - 30:3, 175:24 words [13] - 20:10, 32:18, 34:27, 37:22, 46:16, 58:7, 102:8, 133:14, 159:25, 169:12, 184:8, 184:20, 186:1 works [1] - 81:11 world [3] - 42:2, 150:6, 165:4 worried [1] - 113:2 worry [1] - 49:25 worse [1] - 109:20 worth [1] - 115:26 would've [12] - 10:10, 10:11, 10:15, 24:29, 32:7, 36:26, 38:4, 38:8, 38:19, 178:7, 180:18 wriggle [1] - 26:2 write [7] - 59:6, 63:28, 68:17, 72:7, 82:2, 139:29, 195:9 writing [8] - 68:16, 81:23, 81:24, 91:11, 109:1, 119:27, 156:1, 178:15 written [7] - 56:12, 82:21, 144:7, 154:17, 177:10, 181:19, 193:4 wrongfully [1] - 171:3 wrongly [1] - 158:7 wrote [10] - 71:26, 124:26, 131:25, 143:24, 147:17, 154:1, 154:2, 157:28, 169:19, 170:13</p>	<p>144:12, 144:16, 145:14, 182:2, 187:4 yes [1] - 94:1 yesterday [18] - 14:1, 14:8, 15:10, 18:5, 21:4, 25:14, 25:17, 31:28, 47:2, 52:12, 53:25, 61:12, 71:26, 86:7, 87:28, 89:5, 89:9, 97:13 yesterday's [1] - 13:28 young [5] - 145:5, 147:27, 152:10, 152:21, 183:17 yourself [12] - 11:14, 32:5, 42:1, 42:13, 42:16, 42:17, 42:18, 45:2, 74:22, 100:1, 124:3</p>
É				
<p>Éireann [12] - 17:1, 36:17, 38:6, 148:27, 159:7, 160:25, 160:27, 161:3, 162:24, 176:6, 180:19, 182:27 ÉIREANN [2] - 1:5, 1:6</p>				
Ó				
<p>Ó [1] - 2:27</p>				