

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

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AND EQUALITY UNDER THE TRIBUNALS OF INQUIRY (EVIDENCE) ACT  
1921, ON 17 FEBRUARY 2017, AS AMENDED ON 7 DECEMBER 2018

CHAIRMAN OF DIVISION (P): MR. JUSTICE SEAN RYAN,  
FORMER PRESIDENT OF THE COURT OF APPEAL

HELD IN DUBLIN CASTLE  
ON WEDNESDAY, 6TH NOVEMBER 2019 - DAY 111

111

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 SEAN RYAN,  
FORMER PRESIDENT OF THE COURT OF  
APPEAL

REGISTRAR: MR. PETER KAVANAGH

FOR THE TRIBUNAL: MR. DIARMAID McGUINESS SC  
MR. PATRICK MARRINAN SC  
MS. SINÉAD McGRATH BL  
MR. JOHN DAVIS, SOLICITOR

FOR GARDA NICHOLAS KEOGH: MR. MATTHIAS KELLY SC  
MR. PATRICK R. O'BRIEN BL  
MS. AISLING MULLIGAN BL  
INSTRUCTED BY: JOHN GERARD CULLEN SOLICITORS  
MAIN STREET  
TOWNPARKS  
CARRICK-ON-SHANNON  
CO. LEITRIM

FOR SUPERINTENDENT  
NOREEN McBRIEN: MR. PAUL CARROLL SC  
MR. JOHN FERRY BL  
INSTRUCTED BY: CARTHAGE CONLON  
O'MARA GERAGHTY McCOURT  
SOLICITORS  
51 NORTHUMBERLAND ROAD  
DUBLIN 4

FOR ASSISTANT COMMISSIONER  
FINTAN FANNING: MR. PAUL McGARRY SC  
MR. STEPHEN O'CONNOR BL  
MR. ANDREW FREEMAN  
INSTRUCTED BY: SEAN COSTELLO & COMPANY  
SOLICITORS  
HALIDAY HOUSE  
32 ARRAN QUAY  
SMITHFIELD  
DUBLIN 7

FOR GARDA FERGAL GREENE,  
GARDA STEPHANIE TREACY  
& GARDA DAVID TURNER: MR. PATRICK McGRATH SC  
MR. JAMES KANE BL  
MR. EOIN LAWLOR BL  
INSTRUCTED BY: MS. ELIZABETH HUGHES  
MS. ÉABHALL NÍ CHEALLACHÁIN  
HUGHES MURPHY SOLICITORS  
13 WELLINGTON QUAY  
TEMPLE BAR  
DUBLIN 2

FOR

1. COMMISSIONER OF AN GARDA SÍOCHÁNA
2. CHIEF SUPERINTENDENT PATRICK MURRAY
3. CHIEF SUPERINTENDENT MARK CURRAN
4. DETECTIVE INSPECTOR MICHAEL COPPINGER
5. CHIEF SUPERINTENDENT LORRAINE WHEATLEY
6. RETIRED DETECTIVE SUPERINTENDENT DECLAN MULCAHY
7. ASSISTANT COMMISSIONER MICHAEL FINN
8. CHIEF SUPERINTENDENT ANTHONY MCLOUGHLIN
9. RETIRED ASSISTANT COMMISSIONER JACK NOLAN
10. RETIRED ACTING COMMISSIONER DONAL Ó CUALÁIN
11. RETIRED COMMISSIONER NOIRÍN O'SULLIVAN
12. ASSISTANT COMMISSIONER ANNE MARIE MCMAHON
13. CHIEF SUPERINTENDENT JOHN SCANLAN
14. SUPERINTENDENT ALAN MURRAY
15. SUPERINTENDENT AIDAN MINNOCK
16. INSPECTOR EAMON CURLEY
17. GARDA MICHAEL QUINN
18. RETIRED GARDA GERRY WHITE
19. CHIEF MEDICAL OFFICER DR. OGHUVBU
20. GARDA OLIVIA KELLY
21. RETIRED DETECTIVE SERGEANT TOM JUDGE
22. MR. ALAN MULLIGAN, ACTING EXECUTIVE DIRECTOR
23. RETIRED DETECTIVE CHIEF SUPERINTENDENT PETER KIRWAN
24. MR. JOE NUGENT, CHIEF ADMINISTRATIVE OFFICER
25. CHIEF SUPERINTENDENT KEVIN GRALTON
26. INSPECTOR BRIAN DOWNEY
27. MONICA CARR, HEAD OF DIRECTORATE, HUMAN RESOURCES AND PEOPLE DEVELOPMENT
28. MR. BRIAN SAVAGE
29. CHIEF SUPERINTENDENT ANNE MARIE CAGNEY
30. DETECTIVE INSPECTOR SEAN O'REARDON
31. INSPECTOR LIAM MORONEY
32. ASSISTANT COMMISSIONER DAVID SHEAHAN
33. CHIEF SUPERINTENDENT MATT NYLAND
34. CHIEF SUPERINTENDENT MICHAEL FLYNN
35. SERGEANT KIERAN DOWNEY
36. ASSISTANT COMMISSIONER ORLA MCPARTLIN
37. CHIEF SUPERINTENDENT MARGARET NUGENT
38. GARDA AISLING SHANKEY-SMITH
39. INSPECTOR TARA GOODE

MR. SHANE MURPHY SC  
MR. MÍCHEÁL P. O'HIGGINS SC  
MR. CONOR DIGNAM SC  
MR. DONAL MCGUINNESS BL  
MS. SHELLEY HORAN BL  
MS. KATE EGAN BL  
MS. ALISON MORRISSEY  
MS. EMMA GRIFFIN  
CHIEF STATE SOLICITOR'S OFFICE  
OSMOND HOUSE  
LITTLE SHIP STREET  
DUBLIN 8

INSTRUCTED BY:

FOR MS. OLIVIA O'NEILL:  
INSTRUCTED BY: MR. JOHN CONNELLAN BL  
MR. PAUL CONNELLAN  
T&N McLYNN  
BASTION COURT  
11-13 CONNAUGHT STREET  
ATHLONE

CO. WESTMEATH

FOR AGSI,  
INSPECTOR NICHOLAS FARRELL,  
SERGEANT ANDREW HARAN,  
SERGEANT AIDAN LYONS,  
SERGEANT SANDRA KEANE:

INSTRUCTED BY:

MR. DESMOND DOCKERY SC  
MS. PEGGY O'ROURKE SC  
MS. SINÉAD GLEESON BL  
REDDY CHARLTON SOLICITORS  
12 FITZWILLIAM PLACE  
DUBLIN 2

I N D E X

W I T N E S S

P A G E

G A R D A N I C H O L A S K E O G H

C R O S S - E X A M I N E D B Y M R . M U R P H Y . . . . . 6

1 THE HEARING RESUMED, AS FOLLOWS, ON WEDNESDAY, 6TH  
2 NOVEMBER 2019:

3  
4 CHAIRMAN: Now, where is Garda Keogh?

5 WITNESS: Good morning. 10:29

6 CHAIRMAN: Good morning.

7 MR. MURPHY: Good morning, Chairman. Good morning,  
8 Garda Keogh.

9  
10 GARDA NICHOLAS KEOGH CONTINUED TO BE CROSS-EXAMINED BY 10:29  
11 MR. MURPHY, AS FOLLOWS:

12  
13 CHAIRMAN: Now, you were going on to?

14 MR. MURPHY: Yes, Chairman, but before we do, I wonder  
15 could I ask a number of very short questions in  
16 relation to the last section? 10:29

17 CHAIRMAN: Yes.

18 MR. MURPHY: There was one area I wanted to take  
19 instructions on.

20 CHAIRMAN: I think you mentioned that. Yes. 10:29

21 MR. MURPHY: It won't take long, Judge.

22 CHAIRMAN: It's all right.

23 1 Q. MR. MURPHY: I wonder if you could be shown, please,  
24 book 20 and page 5995. Yesterday, Garda Keogh, I think  
25 in the course of the transcript at page 61, you said  
26 the following words, you said: 10:30

27  
28 "I didn't know for a long period of time that it was  
29 Assistant Commissioner McMahon."

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who who was carrying out the investigation.

Could you help the Chairman to understand when you became aware that it was Assistant Commissioner McMahon?

10:30

A. The first I think that I became aware was when I received a text message from Aidan Minnock. But I had nothing officially, all I was aware was Jack Nolan was doing the investigation, he retired. I had nothing formally in writing from anywhere to say who was doing the investigation. And that's what I was looking for; something formally in writing to say this person is doing the investigation. I got nothing. There's nothing in those documents to say where I was informed.

10:30

10:31

2 Q. Apart from formal notification, would you agree with me that on 6th March 2018, when Detective Inspector Seamus Maher spoke to you, that he told you that Anne Marie McMahon was involved in this investigation?

A. Can we see the -- that's what I explained yesterday. I have an issue with this, this thing. I have no note of this conversation.

10:31

3 Q. But you're aware, I think you indicated yesterday, that the detective inspector took?

A. Sorry?

10:31

4 Q. You are aware of a note that the detective inspector took? This is the one you referred to?

A. I said it's an incredible document, never seen before. In that it appears -- Judge, if it could be brought up

1 on the screen, it would simplify.

2 5 Q. Let's take it in stages, Garda Keogh. First of all,  
3 will you agree with me that you met with him?

4 A. I met with --

5 6 Q. On 6th March 2018. 10:32

6 CHAIRMAN: Hold on one second. Sorry, start again.  
7 Say that again. I just want everybody to know exactly  
8 what they are saying.

9 7 Q. MR. MURPHY: would you agree with me that he telephoned  
10 you on 6th March 2018? 10:32

11 A. I have no note of it. I have no note of it.

12 8 Q. Can I put it to you that he will say that he did. So  
13 in those circumstances, he spoke with you by way of a  
14 telephone call and he took a note, the note that you  
15 know he took, this is the one you referred to 10:32  
16 yesterday; isn't that right?

17 A. If we can bring the note up, Judge.

18 9 Q. I will. But before we go to the note, just dealing  
19 with reality. would you accept there was a phone call  
20 from detective Inspector Seamus Maher to you on that 10:32  
21 date?

22 A. Judge, my diary notes have on the 6th March, at 13:08:  
23  
24 "Superintendent text me to say inspector Seamus Maher  
25 looking for my number as part of AC McMahon's 10:32  
26 investigation team."  
27  
28 The next morning at 7:43am:  
29



1 "Superintendent Minnock text me. Inspector Maher tells  
2 me he okay now."

3

4 That is all I have.

5 10 Q. Again, you told the Chairman many times that you tend 10:33  
6 to forget things. I have to suggest to you that  
7 Detective Inspector Maher took a note of this telephone  
8 conversation with you. Do you deny that that  
9 conversation happened at all or is it that you don't  
10 remember it? 10:33

11 A. Judge, as I explained, I can't confirm or deny the  
12 conversation. I don't remember it. I have no note of  
13 it. The document, it's not even a note, it seems to be  
14 a transcript of -- it appears to be -- it's a recording  
15 of a phone call which had been transcribed down. The 10:33  
16 document, as I said, I have never seen anything like it  
17 before and I don't know if any solicitor or barrister  
18 ever dealing with Garda stuff or criminal cases has  
19 seen a document like this.

20 11 Q. You see, Garda Keogh, again that's another exaggeration 10:33  
21 on your part. You told the Chairman on a number of  
22 occasions that you weren't very good with paperwork.  
23 Can I suggest to you that the alternative explanation  
24 for this is that the detective inspector was good with  
25 paperwork and he took a note of the phone call with 10:34  
26 you. Could we please show you the document?

27 A. Please.

28 12 Q. which is 11286, volume 40.

29 A. Judge, there's a typed version somewhere in the files.

1 CHAIRMAN: Thanks very much. will we get the typed  
2 version? we're going to be here a while, Mr. Murphy.  
3 MR. MURPHY: No, Chairman, I think the version that's  
4 in the Tribunal book is the one I'm operating from, and  
5 that's in the volume that was served on us. 10:34  
6 CHAIRMAN: very good. All right. Can you read that?  
7 WITNESS: No.  
8 CHAIRMAN: I can't. I mean, sorry, if we sat down, I  
9 can decipher it. But anyway, are you referring to much  
10 of it, Mr. Murphy? 10:35  
11 MR. MURPHY: No, Chairman, I'm not.  
12 CHAIRMAN: Is there an easy bit.  
13 MR. MURPHY: Yes, there is.  
14 CHAIRMAN: which bit are you referring to?  
15 MR. MURPHY: The first bit, Chairman, the bottom of 10:35  
16 11285, left-hand side, 6/3/18. Can you see that, Garda  
17 Keogh.  
18 CHAIRMAN: we haven't got 11285 yet.  
19 MR. KELLY: Chairman, the witness says that he has come  
20 across a typed version. I was looking at this this 10:35  
21 morning, I can't make head nor tail of it. If there is  
22 a typed version.  
23 CHAIRMAN: That would be helpful.  
24 MR. KELLY: It would be extremely helpful.  
25 CHAIRMAN: Detective Inspector Maher, in due course, 10:35  
26 can confirm or correct any problems, any errors, any  
27 transcription errors or something like that.  
28 MR. KELLY: I am just a little concerned that the  
29 witness is being cross-examined on a document that

1 certainly, for my part, I am having difficulty reading.  
2 CHAIRMAN: Mr. Kelly, where I am going with this, I  
3 completely -- my understanding, first of all, just  
4 where we stand, before we get to the note, where we  
5 stand, and correct me if I am wrong about this: Garda 10:36  
6 Keogh says, I don't remember a phone call on 6th March  
7 2018 from Detective Inspector Seamus Maher. The  
8 implication from what he says, as I take it, is, that  
9 he says, if I had got a phone call, I think I would  
10 have made a note of it. That's is the implication of 10:36  
11 what he is saying. I did get a phone call from the  
12 station about my phone number and, so, that would seem  
13 to suggest, that would have seemed to be the precursor  
14 to a phone call. And then he got another phone call --  
15 he got a text message the next day. Whatever the 10:36  
16 meaning of, I don't know the meaning of it or what we  
17 are to take from it. Then he says, okay, and what's  
18 more, when I see the note that Detective Inspector  
19 Maher made, I think it is in an unusual form, he said.  
20 That's his point. Now, you're going to refer him to 10:37  
21 some particular part of it.  
22 MR. MURPHY: I am.  
23 CHAIRMAN: Just to reassure everybody where my view  
24 was, if the parts that Mr. Murphy is going to rely on  
25 are very clear, I don't see a particular problem at 10:37  
26 this moment. If they are not very clear, we will have  
27 to postpone that to see what we can do to decipher this  
28 and, if necessary, identify it, or maybe make our own  
29 typed transcript in circumstances of tranquility, where

1 we can actually concentrate on it.

2 MR. MURPHY: Thank you, Chairman.

3 CHAIRMAN: For the moment, and if you want to come back  
4 to it, that is all right, but for the moment, if  
5 Mr. Murphy is referring you to bits that are clear that 10:37  
6 we can all read, well and good. Are you happy with  
7 that?

8 WITNESS: well, Judge, I think there is a typed  
9 transcript in these documents, of this.

10 CHAIRMAN: I understand that. But hold on, we don't 10:38  
11 have it to hand at the moment, and in the 50 whatever  
12 it is volumes, we can't -- if Mr. McGuinness can't  
13 remember it, then nobody can remember where it is. So  
14 I am relying that we will find it sooner or later and  
15 if we do, well and good. Okay. But we will muddle 10:38  
16 along for the moment. Okay.

17 13 Q. MR. MURPHY: Thank you, Chairman. On the left-hand  
18 corner at 11285, would you agree with me that the  
19 letters "6318" appear?

20 A. It looks like 6218 on this. 10:38

21 14 Q. Very good. Well again, if you turn over the page  
22 please, to 11286, and this is a note which you say you  
23 read, Garda Keogh?

24 A. Sorry, no, no, I have read the typed -- I have not  
25 read -- I couldn't read. 10:38

26 15 Q. You note there is a note?

27 A. Yes.

28 CHAIRMAN: which bits are you referring, to Mr. Murphy?  
29 Given that we have a question is it 63 or 62, we can

1 have our views on that, but that's is not important.  
2 MR. MURPHY: 11286, Chairman, please.  
3 CHAIRMAN: 11286, very good.  
4 16 Q. MR. MURPHY: You will see on the left-hand side:  
5 10:39  
6 "SM I explained I am ringing on behalf of AC Anne Marie  
7 McMahan."  
8  
9 CHAIRMAN: Yes. That's what it says.  
10 17 Q. MR. MURPHY: Then it says: 10:39  
11  
12 "NK - not a good fit".  
13  
14 Do you see that?  
15 A. I can't read it. 10:39  
16 18 Q. "Not a good fit"?  
17 A. Not a good fit?  
18 19 Q. Did you say that?  
19 A. Chairman, as I've stated, I don't even remember this  
20 phone call. 10:39  
21 20 Q. So I have to suggest to you that the phone call did  
22 take place. If you can't remember it, Detective  
23 Inspector Maher can. He will say, as the note  
24 suggests, that he explained to you that he was ringing  
25 on behalf of Assistant Commissioner Anne Marie McMahan, 10:39  
26 isn't that clear from the note?  
27 A. Judge, as I said yesterday in relation to this as well,  
28 I've explored every possibility myself as to why I  
29 can't remember it. I see, I note the time, it's 10:15

1 on that.

2 CHAIRMAN: Okay. Garda Keogh, can you stop for a  
3 second.

4 WITNESS: Sorry.

5 CHAIRMAN: Mr. Murphy, we are engaged in a fairly 10:40  
6 hopeless endeavour, looking at a scanned copy of a  
7 handwritten note and it's not sufficiently clear. Can  
8 you postpone your cross-examination on this issue.

9 MR. MURPHY: Yes.

10 CHAIRMAN: We will return to it in due course, either 10:40  
11 with an enhanced investing of the handwritten note or  
12 an enhanced version plus a typed copy, is that all  
13 right?

14 MR. MURPHY: Certainly, I have no difficulty.

15 CHAIRMAN: Mr. Kelly, that seems to be the way to deal 10:40  
16 with it.

17 MR. KELLY: I agree, Judge, it is the way to deal with  
18 it when it's unclear.

19 CHAIRMAN: Thanks very much. Do you understand?

20 WITNESS: Yes. 10:40

21 CHAIRMAN: It is much simpler.

22 WITNESS: Yes.

23 CHAIRMAN: We all know where we are then.

24 WITNESS: Even the date, it looks like 6218.

25 CHAIRMAN: I got that, don't worry. I am not agreeing 10:41  
26 that it says 62, but I heard what you said about it.  
27 Okay.

28 MR. MCGUINNESS: Chairman, might I just draw to your  
29 attention that we have not received a statement from

1 inspector Maher. Mr. Murphy has confirmed that to me.  
2 So I would be very anxious that we would receive a  
3 statement obviously before long.

4 CHAIRMAN: That be would helpful. Mr. Murphy, can you  
5 take responsibility for that? 10:41

6 MR. MURPHY: Certainly, Chairman.

7 CHAIRMAN: Are you the person I address in relation to  
8 that issue?

9 MR. MURPHY: Yes, Chairman. That will be done. This  
10 is an issue raised by the witness yesterday, when he 10:41  
11 raised the reference to the note, which is not a note  
12 either Mr. McGuinness or myself had identified as  
13 relevant to the issue. As the witness has done so,  
14 this --

15 CHAIRMAN: Certainly. Well, if we can get a statement. 10:41  
16 If the detective inspector or whatever his rank is now,  
17 if he would be good enough, if it hasn't happened  
18 already, to give us as good a copy as he can of the  
19 original.

20 MR. MURPHY: Yes. 10:42

21 CHAIRMAN: And to give us a, what do you call it, a  
22 typed copy. That would be great.

23 MR. MURPHY: Yes, Chairman. What I will do, I have  
24 three other questions but I will defer those questions  
25 until we deal with that matter. 10:42

26 CHAIRMAN: I think that seems the sensible thing to do  
27 all round. Okay. We're talking about a few minutes,  
28 Mr. Murphy.

29 MR. MURPHY: That's all.

1 CHAIRMAN: If it has to be interposed at some point,  
2 that wouldn't be a disaster.  
3 MR. MURPHY: I can see it taking no longer than five to  
4 ten minutes.  
5 CHAIRMAN: Thank you very much. Okay, very good. 10:42  
6 MR. MURPHY: Chairman, with your permission, may I  
7 proceed to deal with issue number 20, which is  
8 complaints by Garda Nicholas Keogh in relation to the  
9 promotion of Superintendent Patrick Murray to chief  
10 superintendent in 2017. 10:42  
11 CHAIRMAN: Yes. Thank you.  
12 21 Q. MR. MURPHY: I wonder first of all if you could please  
13 take out your diary for 2014. That, Chairman, is page  
14 13267 at book 47.  
15 A. Just the date, please? 10:43  
16 22 Q. 13267, and the date is 30th July 2014.  
17 A. Yes.  
18 23 Q. Do you see on the 30th, it says:  
19  
20 "3pm Doyle J Wilson met with Clare Daly TD section 62 10:43  
21 Garda Act."  
22  
23 A. Yes.  
24 24 Q. Can I ask you, is that the first time you met with  
25 Deputy Daly? 10:43  
26 A. I wouldn't...  
27 25 Q. Could it be one of the first times that you met with  
28 Deputy Daly?  
29 A. I would have had a note previous if I met her. I know



1 I definitely met with her when I was -- at some point,  
2 it was only an introduction when I was with Luke Ming  
3 Flanagan earlier in 2014. So that could have been one  
4 of the first times, when he became an MEP, I then went  
5 was in liaison with deputies Daly and Wallace.

10:44

6 26 Q. Then could I ask you, please, to turn forward in your  
7 diary to January 2015, page 13293, please.

8 A. Just the date please?

9 27 Q. Yes, the date, the 7th January. Do you have that?

10 A. Yes.

10:45

11 28 Q. Do you see where it says "FG under pressure" is that  
12 Fergal Greene?

13 A. Yes, Judge.

14 29 Q. Then the next phrase, you say:

15

10:45

16 "My reply Shakespeare not Hercules himself. Do what  
17 may be done. Each dog will have its day."

18

19 Then it says:

20

10:45

21 "Stalingrad this will turn."

22

23 A. Yes.

24 30 Q. Just in next entry at the top of the page, there is a  
25 reference to:

26

10:45

27 "Talking to Mick Wallace."

28

29 Is that right?

1 A. That's the next day.

2 31 Q. The next day, I see. So at that stage, can we take it  
3 that --

4 A. Sorry, just one second, the next day, it's not "talking  
5 to Mick Wallace" it's a text I sent Mick Wallace to say 10:45  
6 "nine months today". In other words, back then I am  
7 concerned this has gone on nine months at that stage.  
8 I know it's a number of years ago now, but.

9 32 Q. So, can we take then that you had been speaking to  
10 deputy Wallace before that date? 10:45

11 A. I would imagine so.

12 33 Q. You have spoken to Deputy Flanagan, as we know, before?

13 A. Yes. I would have been talking to Mick Wallace, if I  
14 able to text him "nine months today", I would have  
15 certainly been talking to Mick Wallace and Deputy Daly 10:46  
16 at that point in time, 2015.

17 34 Q. Could you just then turn forward, please, to page  
18 13296, which I think is 28th January 2015.

19 A. Yes, Judge.

20 35 Q. Again, you might just help the Chairman and myself to 10:46  
21 understand your handwriting here, but does it say:  
22  
23 "Mick Wallace asks Enda Kenny."  
24  
25 Is that correct? 10:46

26 A. Yeah, that's correct.

27 36 Q. Could you just read the balance, please, just so I  
28 understand it.

29 A. I will read it?

1 37 Q. Please, if you will.  
2 A.  
3 "Mick Wallace asks Enda Kenny when he was first aware  
4 of Garda malpractice in Athlone. Enda Kenny avoided  
5 answering. Mick Wallace asked him again. Enda Kenny 10:47  
6 said, I'm not sure exactly what you're referring to."  
7  
8 38 Q. So, is there some materials that you provided to Deputy  
9 Wallace, information?  
10 A. There was information that I had become aware of that I 10:47  
11 provided, it was information and I provided it to  
12 Deputy Wallace.  
13 39 Q. Could I ask you then, please, to turn on to 5th  
14 February 2015, at page 13297, please?  
15 A. Judge, that could have been the day Enda Kenny gave the 10:47  
16 handwritten note to Deputy Wallace, to ask him to meet  
17 afterwards. I'm not sure if it's that date. But there  
18 was a handwritten note passed from the Taoiseach at the  
19 time to Mick Wallace to meet after the Dáil sitting in  
20 relation to it. 10:48  
21 40 Q. Can I just ask you then to turn over, please, to page  
22 13297, which is 5th February 2015?  
23 A. Going back to the 5th, is it?  
24 41 Q. Please. Well, the 4th.  
25 A. Sorry. Yes. 10:48  
26 42 Q. I think there you have a reference to:  
27  
28 "Deputy Clare Daly alleges Ó Cualáin covered a whole  
29 complaint against Garda".

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Is that information you provided to Deputy Daly?

A. No, it's not information I provided. I'm now aware of what it was, Judge. At the time it was --

43 Q. No, no. 10:49

A. Well, if I can explain?

44 Q. No, you have already said you weren't involved in passing that information, that was my question?

A. I wasn't involved, but I am aware of it, if you wish --

45 Q. It's not relevant to this term of reference. What I was asking you was, did you pass on the information to Deputy Daly and you said no? 10:49

A. No.

46 Q. So, can we move on then, please, to the 25th March, which I think is a Wednesday, that is page 13304. 10:49

A. Yes.

47 Q. Can I ask you just to help us understand the writing there. Are there names of senior officers?

A. Yes. On the 25th, Wednesday, March, Judge, I have a note of: 10:50

"Assistant Commissioner Kieran Kenny, Assistant Commissioner John Twomey. . ."

Now deputy commissioner. 10:50

"... Assistant Commissioner Donal Ó Cualáin, Chief Superintendent Aidan Glacken at Leinster House."

1 48 Q. You're off sick that day, is that something you're  
2 monitoring from your home?

3 A. Judge, I was looking at the journal and the top cover  
4 image for that date on the journal had a photograph,  
5 ironically, of those four individuals walking into 10:50  
6 Leinster House. It caught my eye, because this is  
7 incredible, because AC Ó Cualáin is investigating one  
8 of the other persons in the photo and the two of them  
9 were walking in side by side. And that's why I made  
10 the note of that. And it's there on the journal, I 10:50  
11 would imagine, if anyone wishes to go back and view the  
12 photograph, that was the cover photograph. I don't  
13 think they even had an article in relation to it, it  
14 just happened to be a photograph they took as their  
15 main cover photograph that day. 10:51

16 49 Q. I think you refer to that at the top of the next page,  
17 the 26th, is that right?

18 A. Yes.

19 50 Q. Even though that in fact relates to the 25th?

20 A. Yeah. 10:51

21 51 Q. So, is this an example of you writing things after the  
22 event?

23 A. But sure, after the event, we're talking about, what,  
24 this is within a 24-hour period.

25 52 Q. Yes, but it's not on the same day, that's fine. 10:51

26 A. Sorry?

27 53 Q. It's not on the same day, I think you will agree?

28 A. Well, I mean, look, if I had written in that at 11:55pm  
29 or I wrote it in at, let's say, 12:05am, we're in two

1 different days. It was within a 24-hour period.

2 54 Q. I wonder if I could ask you to be shown on the booklet,  
3 please, Volume 8, at page 2062. Garda Keogh, this is  
4 the statement of Superintendent Patrick Murray. He  
5 will say in his evidence that his first meeting with 10:52  
6 you is on 26th March 2015; isn't that right?

7 A. That's the first official meeting in Athlone, yeah.

8 55 Q. Yes. In terms of the next sequence, he will say, that  
9 on 1st April 2015, Deputy Wallace raised the  
10 interaction between Superintendent Murray and you in 10:52  
11 Dáil Éireann in relation to the question of your car  
12 tax, do you remember that?

13 A. I would have made an issue over the car tax with Deputy  
14 Wallace.

15 56 Q. Would you agree that you supplied that information to 10:53  
16 Deputy Wallace to deploy in the Dáil?

17 A. I gave that information to Deputy Wallace and, Judge,  
18 just for clarification, deputies Wallace and Daly don't  
19 go shouting about everything just because someone like  
20 me says it. So there's plenty of stuff I had told them 10:53  
21 that never cropped up in the Dáil. And, indeed, as  
22 we --

23 57 Q. Garda Keogh --

24 A. No, I have to back this up. In relation to even Luke  
25 Ming Flanagan, he didn't mention anything in the Dáil 10:53  
26 until he got an affidavit. So it's not that these are  
27 unscrupulous and they are jumping up and down just  
28 because the first guard comes to tell them a story.

29 MR. McGUINESS: I am sorry to interrupt Mr. Murphy,

1 but there has been a reference made there to Dáil on  
2 the 1st April, and we have circulated the debate for  
3 the entirety of that day, which is now in Volume 55, it  
4 doesn't appear to record any such mention of the car  
5 tax issue or any similar item. 10:54

6 MR. MURPHY: well, I will pass on from that and return  
7 to it. There is a document that I will discuss with  
8 Mr. McGuinness.

9 58 Q. CHAIRMAN: Did you think that Deputy Wallace raised the  
10 car tax issue? 10:54

11 A. I can't remember exactly. I'll just check my diary  
12 for...

13 MR. MURPHY: But I think you did tell us, Garda Keogh,  
14 that had you told him about the tax issue.

15 59 Q. CHAIRMAN: You told him about the tax? 10:54

16 A. Yeah, I would have told him. I can't remember if he  
17 raised it. I don't know if he would have raised it. I  
18 don't know is the answer, Judge. Anything that was  
19 raised in the Dáil will be on Dáil records.

20 60 Q. MR. MURPHY: was it your intention when telling him 10:54  
21 about the car tax that he would then publish that  
22 information in the Dáil?

23 A. No, Deputy Wallace doesn't publish anything in the  
24 Dáil. Obviously it would go onto the Dáil record.  
25 But, no, I told Deputy Wallace lots of other things 10:54  
26 that certainly never went any further.

27 61 Q. Is it the case though --

28 A. And just for clarification, Judge, because the way this  
29 is going, it's as if I am the only member of An Garda

1 Síochána that speaks to Deputy Wallace and Daly.  
2 Judge, there's an awful lot of other guards, members of  
3 the force and retired members that are in touch with  
4 them. Because anybody that would find themselves in  
5 any sort of a similar situation, they're the tried and 10:55  
6 tested and proven people to go to, and anyone with  
7 common sense would go to them. So they are hearing  
8 various things from members of An Garda Síochána from  
9 across the country of different ranks and the way this  
10 appears to be spun is that everything, like that 10:55  
11 western region incident, came from me. I knew nothing  
12 about that.

13 62 Q. You see, Garda Keogh, we're not talking about other  
14 guards in this issue, we're talking about you. So I  
15 think you've agreed that you told Deputy Wallace about 10:55  
16 this information. Can I take it from that, that it was  
17 your intention that he would publish this and speak  
18 about this in the Dáil?

19 A. No, Judge. As I've said, I have told Deputies Wallace  
20 and Daly numerous other things in relation to -- that 10:56  
21 never cropped their heads up. You know, they evaluate  
22 themselves. It's not as a case that I'd say to them, I  
23 want you to say this in the Dáil. That is not the way  
24 they work. I tell them the story, they will listen,  
25 they will ask me certain questions, that's it. What 10:56  
26 they use -- there's certain times that never -- where I  
27 would be expecting them to bring up matters on policing  
28 and they would move, for example, it could be something  
29 to do with Wexford or Dublin north central, to do with



1           their constituencies, and it's not used at all. It  
2           depends. They have the information, they use that  
3           whatever way -- it's not -- I have no further part in  
4           it, other than I inform them of any wrongdoing that I'm  
5           aware of. 10:57

6   63   Q.   And can we take it that you were hopeful that they  
7           would speak about it in the Dáil?

8           A.   I mean, I can't, I can't answer that, because there's a  
9           whole sequence of events. And at that point in time,  
10          it may not have been relevant to bring it up in the 10:57  
11          Dáil, you know.

12   64   Q.   CHAIRMAN: Can I ask you a question?

13          A.   Yes, Judge.

14   65   Q.   CHAIRMAN: Why did you tell them about the car tax?

15          A.   Judge, the whole thing with the car tax was -- 10:57

16   66   Q.   CHAIRMAN: No, no, just --

17          A.   Oh, yeah.

18   67   Q.   CHAIRMAN: It is a simple question: why did you tell  
19          them about the car tax?

20          A.   Because I believed -- 10:57

21   68   Q.   CHAIRMAN: I am trying to ask as neutral a question as  
22          I possibly can.

23          A.   Yes. I believe I was being targeted in relation to the  
24          car tax. I mean, we have already --

25   69   Q.   CHAIRMAN: As early as the 1st April, is that right? 10:57

26          A.   The 1st --

27   70   Q.   CHAIRMAN: So the meeting was on the 26th March.

28          A.   Yeah, then I got disciplined for the car tax. So I had  
29          been disciplined -- or -- look it, I can't remember.

1 But it's in that time period I did they will them about  
2 the car tax.

3 71 Q. MR. MURPHY: I wonder if you could be, please, shown  
4 volume 22, page 6467, please?

5 A. Just for clarification, Judge, like this car and the 10:58  
6 previous car I had was exactly the same, with only two  
7 seats in it. So I'm driving the same vehicle for  
8 years.

9 72 Q. CHAIRMAN: Yes.

10 A. And there's no issue at all. And actually, those 10:58  
11 sub-claims, I meant to say, Judge, they were for  
12 periods on duty, I wasn't using the car privately.  
13 That's irrelevant, but then, when I become a  
14 whistleblower there's a huge issue with my car tax.

15 73 Q. CHAIRMAN: I think we have been over the car tax. 10:58  
16 A. Yes.

17 74 Q. CHAIRMAN: If there is something extra, well and good.  
18 A. No, no.

19 75 Q. CHAIRMAN: I am sort of reluctant to explore it. I  
20 just wanted to ask you what you thought. The reason 10:58  
21 you said you raised it with Deputy wallace was that you  
22 felt -- sorry, do we have a date for that meeting with  
23 Deputy wallace, when you told him about the car tax?

24 A. Judge...

25 76 Q. CHAIRMAN: It's not important if you don't. 10:58  
26 A. I have it -- I wouldn't have --

27 77 Q. CHAIRMAN: Superintendent Murray thinks that --  
28 MR. MCGUINNESS: I can help you on that, Chairman.  
29 CHAIRMAN: Yes, thanks.

1 MR. MCGUINNESS: Garda Keogh's diary appears to record  
2 that on the 30th March -  
3 CHAIRMAN: Thank you.  
4 MR. MCGUINNESS: - he met Deputy Wallace and Daly.  
5 78 Q. CHAIRMAN: Okay. Are you happy with that, 30th March? 10:59  
6 A. Yes.  
7 79 Q. CHAIRMAN: And you told them about the car tax?  
8 A. Yes.  
9 MR. MURPHY: In fact, that's a meeting which we  
10 discussed a few days ago, it says in the entry on the 10:59  
11 30th March, which is page 13305:  
12  
13 "Met Mick and Clare and Sergeant McCabe. My first time  
14 to meet Sergeant McCabe."  
15 10:59  
16 It's a reference we dealt with several days ago. You  
17 accept that?  
18 A. Yeah, yeah.  
19 CHAIRMAN: So the 30th March, okay.  
20 80 Q. MR. MURPHY: within that very short time, Garda Keogh, 10:59  
21 the position is that you were making complaints to TDs  
22 and you go one step further on volume 22, page 6467,  
23 please. I think this is the letter which you wrote,  
24 it's your handwriting, to Assistant Commissioner Fintan  
25 Fanning, is that correct? 11:00  
26 A. Yes. Can I just read it first?  
27 81 Q. CHAIRMAN: Yes, take your time. Familiarise yourself  
28 with it.  
29 A. Yes.

1 82 Q. MR. MURPHY: I think the position is that in this  
2 letter addressed to Assistant Commissioner Fintan  
3 Fanning, you say that:  
4  
5 "On 8th May 2014 I made a formal complaint of Garda 11:00  
6 malpractice in the Athlone division. The said matter  
7 is under investigation."  
8  
9 And then:  
10 11:00  
11 "Over the last year I have been advised by members of  
12 An Garda Síochána, both my current Westmeath division  
13 and my previous Wicklow division to speak to yourself."  
14  
15 could I ask you to read out the next few words, please? 11:00  
16 A.  
17 "I am now being advised by both independent TDs Clare  
18 Daly and Mick Wallace to speak to you. I am aware that  
19 you are the assistant commissioner for the region and I  
20 would be obliged if you would consider meeting with 11:01  
21 me."  
22  
23 83 Q. So, I think that request is one that you made at the  
24 suggestion of Deputies Wallace and Daly?  
25 A. Not as simple as that, Judge. There's the first part 11:01  
26 where I wasn't asked to read out, and that is:  
27  
28 "I have been advised by members of An Garda Síochána in  
29 both my current Westmeath division and my previous

1 Wicklow division to speak to yourself."

2

3 The reason that is, Judge, is, I would have maintained  
4 a lot of contact with a lot of members of An Garda  
5 Síochána throughout the country, because some

11:01

6 transferred, so I'd a lot of contacts. All the gardaí,  
7 from when I was telling them there's serious problems  
8 with what's going on here, there's serious problems  
9 with this investigation, virtually every one of them  
10 said, go to Fanning. I didn't know anything about

11:01

11 Assistant Commissioner Fanning, but these were people  
12 that I trusted, members of the force that I was  
13 confiding in, and they all happened to say the same  
14 thing, go to Fanning. Now there was another assistant  
15 commissioner that I was advised to speak to as well,  
16 retired now, Assistant Commissioner Byrne, but the bulk  
17 of these then to Fanning.

11:02

18 84 Q. You are also clearly saying:

19

20 "I have now been advised by Independent TDs Clare Daly  
21 and Mick Wallace to speak to you."

11:02

22

23 So, they told you to speak to Assistant Commissioner  
24 Fanning as well?

25 A. On top of members of all the other members of An Garda  
26 Síochána on the ground.

11:02

27 85 Q. CHAIRMAN: All roads led to Assistant Commissioner  
28 Fanning?

29 A. Yes.

1 86 Q. CHAIRMAN: Wicklow, Westmeath and Dáil Éireann.  
2 A. Yes.  
3 CHAIRMAN: Okay.  
4 87 Q. MR. MURPHY: Can I ask you then to go back, please, to  
5 page 2062? I am moving to the end of mid December 11:02  
6 2015. I think the position is that both Mr. Wallace  
7 and Ms. Daly accused Superintendent Murray in public,  
8 in Dáil Éireann, of harassing and bullying you, and  
9 wrongly classifying crimes in the district in a  
10 deliberate fashion; isn't that right? 11:03  
11 A. Yes.  
12 88 Q. Did you tell that information to them with the hope and  
13 expectation that they would say it in the Dáil?  
14 A. I passed on that information to them because at the  
15 time there was a whole issue to do with fiddling of 11:03  
16 figures. It was not just in the Dáil, Deputy Wallace  
17 and Daly were members of the Justice Committee also,  
18 Judge. So they had a, what's the word, a more  
19 prevalent role in matters than just asking questions in  
20 the Dáil. 11:04  
21 89 Q. But in this case, I have to suggest to you, Garda  
22 Keogh, that what you are doing is you are targeting  
23 Superintendent Murray by name, isn't that right?  
24 A. That's an interesting way of putting it, I'm exposing  
25 corruption. 11:04  
26 90 Q. And again I have to suggest to you what you are doing  
27 is you are targeting him because you are doing it in a  
28 forum where you know he can't reply, where he can't  
29 speak back and which is covered by Dáil privilege,



1 incident, which was declassified, and where I had to,  
2 in the chain of correspondence, to go back, writing in  
3 relation to the robbery from the person, where I  
4 discovered then that he had declassified that incident.  
5 That's where then I looked at other incidents, and I 11:05  
6 saw a lot of other incidents that he had declassified.  
7 I then printed those off and I brought them to the  
8 attention of Deputy Wallace and Daly.

9 96 Q. Again I have to suggest to you that there's no  
10 foundation for the allegation that this is corruption. 11:06  
11 But this is you putting a spin on these matters. If I  
12 can ask you, please, to see page 2523, please, which is  
13 the following?

14 A. Judge, I would argue it is Mr. Murphy's spin on  
15 matters. 11:06

16 97 Q. 2523, please. Can I draw your attention to the second  
17 last paragraph on the page? There is a reference there  
18 to:

19  
20 "We know for a fact..." 11:06

21  
22 Third line:

23  
24 "... that the massaging of figures is still continuing.  
25 In recent weeks Superintendent Pat Murray station in 11:06  
26 the midlands and Athlone, we have seen direct evidence  
27 of at least eight cases where crimes were written down  
28 so the original crime was reclassified as a more minor  
29 matter. It is clear evidence of massaging the figures,



1 for example changing burglaries to criminal damage,  
2 which is reclassification. This is a very serious  
3 situation. The Garda inspector was clear this is  
4 lawlessness out there which has not been addressed. We  
5 need a strong code of ethics with strong human rights 11:07  
6 at n the centre."

7  
8 And goes on to talk about the Bill.

9 CHAIRMAN: Just identify that, Mr. Murphy.

10 MR. MURPHY: It's Deputy Daly's speech in the Dáil on 11:07  
11 that date.

12 CHAIRMAN: Yes.

13 MR. MURPHY: 15/12/2015.

14 CHAIRMAN: 15/12?

15 MR. MURPHY: 2015. 11:07

16 CHAIRMAN: Thank you. You have a question about that?

17 98 Q. MR. MURPHY: Yes. I have to suggest to you that that  
18 is a specific -- that is an information that you  
19 provided Deputy Daly in the hope and expectation that  
20 Superintendent Murray would be accused of criminal 11:07  
21 conduct with the protection of Dáil privilege, isn't  
22 that correct?

23 A. Judge, just on reading this first line here, sorry, the  
24 first line in the last paragraph:

25 11:07  
26 "It is a very serious situation and the Garda  
27 inspectorate was clear that there is lawlessness out  
28 there that is not being addressed."  
29

1 99 Q. Yes.

2 A. So, I have never disputed I have gave this information,  
3 I've gone into how it came to be. It was actually  
4 Superintendent Murray that set this into train. I  
5 printed off those examples, I gave them to Deputy 11:08  
6 wallace and Daly, and that's it.

7 100 Q. You see --

8 A. They then had evidence to back up whatever they wanted  
9 to say. After that, I mean, it's not like I'm pulling  
10 strings, using them as puppets. They are very much 11:08  
11 their own independently minded people.

12 101 Q. Garda Keogh, they're in your circle of trust, as you  
13 called it earlier on in your evidence. I have to  
14 suggest to you, what are you doing here is deliberately  
15 targeting your superior by accusing him criminal 11:08  
16 offences falsely, by passing on this information to  
17 Deputy wallace Deputy Daly in the hope and expectation  
18 that they will use Dáil privilege to attack  
19 Superintendent Murray, isn't that what's going on here?

20 A. You used that word falsely. 11:09

21 102 Q. Yes.

22 A. Can you clarify that in your question there, please?

23 103 Q. Here's the question, has Superintendent Murray been  
24 convicted of any offences of corruption? Yes or no.

25 A. No. 11:09

26 104 Q. Has Superintendent Murray been prosecuted for any  
27 offence involving corruption? Yes or no.

28 A. No.

29 105 Q. Therefore, there is absolutely no basis to suggest

1 corruption against Superintendent Murray and you know  
2 that.

3 A. That's false though. That last part is false, because  
4 that's not the case.

5 106 Q. You see -- 11:09

6 A. In fact, actually, when you go into this, in relation  
7 to that whole thing with declassifying and all that  
8 messing, I don't think anyone -- with all that went on,  
9 I don't think any member of Garda management was ever  
10 prosecuted or dealt with in any way in relation to 11:09  
11 that.

12 107 Q. Garda Keogh, I have to suggest to you that you know  
13 full well that there is no evidence of corruption.  
14 what you are doing here is circumventing the system by  
15 putting information to the deputies in the hope that 11:09  
16 they will effectively attack Superintendent Murray.  
17 Publicly you can stand back and say, nothing to do with  
18 me?

19 A. Judge, that's false. That's not true. Because there  
20 is evidence of corruption and I gave it to them. I 11:10  
21 said, yes, I printed them off -- printed it off and I  
22 gave it to them. I gave them the evidence.

23 108 Q. Would you agree with me that you wanted them to say  
24 this in the Dáil?

25 A. Mr. Murphy is saying there was no evidence. I'm saying 11:10  
26 yes, there was evidence, it was me that printed it off  
27 and gave it to them.

28 109 Q. You see, what's involved here, Garda Keogh, is you  
29 putting your speculation and conjecture and then giving

1           it to the TDs in the hope that they will go and mention  
2           it in the Dáil; isn't that what's happening here?

3           A.     Judge, no.

4 110 Q.     CHAIRMAN: Did you think he was guilty of corruption?

5           A.     Sorry? 11:10

6 111 Q.     CHAIRMAN: Did you think he was guilty of corruption?

7           A.     Judge, yes. But it's a lower level of -- like in the  
8           scheme of things it's very low level stuff, Judge. But  
9           it is, Judge.

10 112 Q.    CHAIRMAN: Okay. what did you think was the proper way 11:10  
11           of dealing with an allegation of corruption?

12           A.     well, I wouldn't go through -- I couldn't go through  
13           the Guards.

14 113 Q.    CHAIRMAN: Should it be investigated?

15           A.     The investigation could happen via Deputy Wallace. 11:10

16 114 Q.    CHAIRMAN: I mean, Mr. Murphy is suggesting to you that  
17           giving it to the deputies for use in the Dáil was  
18           unfair, because it presumed he was guilty. what about  
19           the presumption of innocence?

20           A.     I understand. 11:11

21 115 Q.    CHAIRMAN: was he entitled to defend himself?

22           A.     He would be entitled.

23 116 Q.    CHAIRMAN: Is everybody not entitled to defend  
24           themselves?

25           A.     Sorry. 11:11

26 117 Q.    CHAIRMAN: Is everybody not entitled to defend  
27           themselves?

28           A.     oh absolutely, absolutely.

29 118 Q.    CHAIRMAN: And to the presumption of innocence?

1 A. Yes, I understand that, yes.

2 119 Q. CHAIRMAN: where does that happen in relation to the  
3 allegations of corruption?

4 A. Judge, all I did was print off the information. I gave  
5 it to deputies wallace and Daly, after that -- 11:11

6 120 Q. CHAIRMAN: Do you see what I am getting at?

7 A. I totally understand.

8 121 Q. CHAIRMAN: I am not trying to get up on your back, but  
9 I mean, this was mentioned in the Morris report, we  
10 know? 11:11

11 A. Yeah.

12 122 Q. CHAIRMAN: For circumstances where the deputies  
13 actually sent the information to the Minister and Judge  
14 Morris was critical of them for not checking it out.

15 A. But, Judge, that wasn't wallace -- I don't think that 11:11  
16 was wallace and Daly.

17 123 Q. CHAIRMAN: No, no, no, absolutely. No, totally  
18 different, absolutely. Anyway, what do you say to the  
19 charge that that was convicting him without giving him  
20 a chance to defend himself? 11:12

21 A. Well, Judge, the way the system works is, whether it's  
22 right or wrong, I was entitled to do what I did. And I  
23 was entitled under section 2 of the An Garda Síochána  
24 Act to bring that to a TD. I brought that lawfully and  
25 legally to a TD. After that, it's up to them whether 11:12  
26 they want to use it. And I understand at the time  
27 there were topical issues where the guards I think were  
28 turning around -

29 124 Q. CHAIRMAN: Clearly.

1 A. - saying everything was wonderful and there is no  
2 problem, this is all sorted. And I was saying, no,  
3 look, this is still going on here.  
4 CHAIRMAN: Okay.

5 125 Q. MR. MURPHY: Garda Keogh, would you agree with me that 11:12  
6 the way in which these words were uttered suggested  
7 that there was no doubt about it but that  
8 Superintendent Murray was guilty?

9 A. Judge, as I said, I noted the words, I provided the  
10 evidence. 11:13

11 126 Q. But you did cause it to be, Garda Keogh, didn't you?  
12 A. I provided the evidence. After that, whatever wording,  
13 the way things were worded or whatever was said, it was  
14 brought up, as I said there was plenty of things  
15 weren't brought up. 11:13

16 127 Q. Did you go back, Garda Keogh, to Deputy Wallace and to  
17 Deputy Daly and say to them, you shouldn't have said  
18 that, please don't say that again?

19 A. No, I did not, Judge.

20 128 Q. I think we can infer from that, I would like the 11:13  
21 Chairman to infer from that that you were quite happy  
22 to allow this allegation sit out there without any  
23 proof because you were trying to target Superintendent  
24 Murray; isn't that right?

25 A. I dispute that, because once again you said without any 11:13  
26 proof, there was proof, and I have given it to Deputy  
27 Wallace and Deputy Daly.

28 129 Q. You know as a serving officer that if you have proof of  
29 criminality, you submit that through a criminal

1 process?

2 A. Judge, I only after saying a second ago I wouldn't even  
3 call it criminality, I'd call it corruption, probably  
4 at a lower level, but it is corruption.

5 130 Q. Again I have to suggest to you that that's completely 11:13  
6 incorrect. If we move forward to January 2016. Can I  
7 ask you, please, to provide 2528 in volume 9.

8 A. 2528.

9 131 Q. Yes, please.

10 A. Yes. 11:14

11 132 Q. Do you have that?

12 A. Yes.

13 133 Q. This is effectively a note taken by Superintendent  
14 Murray in relation to a discussion with Garda Greene?

15 A. Yeah. 11:14

16 134 Q. He will say that Garda Greene called to his office on  
17 that day about summonses, but also he told  
18 Superintendent Murray that he was aware that you were  
19 about to have Deputies Daly and Wallace run a story.

20 A. Well, that's what's written here. 11:15

21 135 Q. Sorry, Chairman, can I show something to  
22 Mr. McGuinness?

23 CHAIRMAN: Certainly.

24 A. Judge, can I ask someone for a lend of a pen?

25 CHAIRMAN: Certainly. 11:15

26 MR. MURPHY: Perhaps in ease of reference, I might show  
27 a second document about the same issue.

28 CHAIRMAN: Yes.

29 MR. MURPHY: That is to say 2529. 2529, please.

1 CHAIRMAN: 2529. It's the same thing but redacted, is  
2 that right?

3 MR. MURPHY: It's a slightly larger version of the same  
4 thing.

5 CHAIRMAN: Yes. 11:16

6 MR. MURPHY: I think that Mr. McGuinness was concerned  
7 to do with names that were irrelevant?

8 CHAIRMAN: Yes.

9 MR. MURPHY: Mr. McGuinness is happy I should use this  
10 document? 11:16

11 CHAIRMAN: Take a moment to read that one. What is  
12 your question about it? Have you read that, Garda  
13 Keogh?

14 WITNESS: Yes, Judge.

15 136 Q. MR. MURPHY: Superintendent Murray will say that Garda 11:17  
16 Greene told him that you had said to Garda Greene that  
17 you were trying to get something on Superintendent  
18 Murray and you thought you had something, and claimed  
19 that you were going to get on to deputies Daly and  
20 Wallace to mention it in the Dáil in an effort to 11:17  
21 damage Superintendent Murray and his reputation?

22 A. Judge, that is to do with a conversation between Garda  
23 Greene and Superintendent Murray. However, there is a  
24 part of it, there is a little bit of truth in this,  
25 Judge. A rumour went around the station when the 11:17  
26 superintendent first arrived, to do with -- I won't go  
27 into it, it was a false rumour basically.

28 137 Q. CHAIRMAN: I mean, if fairness to you, whatever about  
29 the point about your disposition, if you like, towards



1 Superintendent Murray, the point here is, whether you  
2 were disappointed or not, the fact is you discovered it  
3 wasn't true and then didn't proceed with it?

4 A. Judge --

5 CHAIRMAN: I mean, I can well imagine that you would 11:18  
6 say, well look, that actually shows that I was trying  
7 to be as careful as possible to make sure it was true.  
8 There I go, when I shouldn't be intervening but I  
9 imagine that that --

10 138 Q. MR. MURPHY: I will perhaps answer the Chair's 11:18  
11 question. The next sentence indicates that you were  
12 very disappointed and would keep trying.

13 A. Judge, no, no, no.

14 139 Q. Is that what you told him, Garda Keogh?

15 A. No. 11:18

16 140 Q. Is that what you told Garda Greene?

17 A. I can't remember what I told him. If I can explain.

18 141 Q. CHAIRMAN: Yes, hold on. Wait now. We're getting a  
19 little confused. Mr. Murphy is saying to you, look,  
20 accepting that you discovered that this adverse 11:18  
21 material about Superintendent Murray was not true.

22 A. Can I clarify just this?

23 142 Q. CHAIRMAN: I don't want to know what the material was  
24 or anything else.

25 A. No, I won't go into that. 11:19

26 143 Q. CHAIRMAN: Okay. You understand where we are going.  
27 Yes, go on.

28 A. A rumour went around the station about Superintendent  
29 Murray.

1 144 Q. CHAIRMAN: Yes.  
2 A. It was rampant around the station. Everyone was  
3 yapping about it. Obviously I heard it. So I went  
4 further and I went to -- I was able to establish the  
5 source of the rumour, which emanated from a different 11:19  
6 Garda station in a different division.  
7 145 Q. CHAIRMAN: Yes?  
8 A. I was able to basically find out that that rumour was  
9 not true.  
10 146 Q. CHAIRMAN: Was not true? 11:19  
11 A. Was not true.  
12 147 Q. CHAIRMAN: If you had found it was true, would you have  
13 gone to Deputies Daly and Wallace with it?  
14 A. Oh, probably, yes, Judge.  
15 148 Q. CHAIRMAN: Okay. So is it right to say that you might 11:19  
16 have been a little disappointed at discovering that  
17 your enemy was actually in the clear, so to speak?  
18 A. That's fair enough but, Judge, it was me that  
19 established the rumour was false. And I then went back  
20 to others in Athlone Garda Station and -- 11:19  
21 149 Q. CHAIRMAN: I am with you, I am understanding your  
22 point?  
23 A. And said that rumour is not true.  
24 CHAIRMAN: I follow.  
25 150 Q. MR. MURPHY: But you keep trying looking for another 11:19  
26 one, is that right?  
27 A. I don't --  
28 151 Q. Is that what you said to Garda Greene; very  
29 disappointed but will keep trying?

1 A. These are Superintendent Murray's notes so --

2 152 Q. That's what he was told by Garda Greene?

3 A. I have already said from the first week, the problem

4 with Superintendent Murray's notes is, there's some

5 truth, there's some stuff that's false and then there's 11:20

6 some stuff where there's half truths and twisted stuff.

7 They were a nightmare to go through when I was reading

8 them, Judge.

9 153 Q. Superintendent Murray will say that he told Garda

10 Greene that he was concerned for your welfare and he 11:20

11 felt that you should take the CMO's advice and you

12 should go for treatment for alcohol?

13 A. These are Superintendent Murray's notes, Judge.

14 154 Q. CHAIRMAN: Of a conversation with Garda Greene.

15 A. Yes. 11:20

16 155 Q. CHAIRMAN: And their only real relevance is in the

17 implication that you said this to Garda Greene or that

18 Garda Greene transmitted this ultimately to you?

19 A. Yes.

20 156 Q. CHAIRMAN: Came back to you and said listen, you better 11:20

21 get treatment for --

22 A. Judge, there is another issue to touch on.

23 157 Q. CHAIRMAN: Yes.

24 A. I don't know when exactly, it will be in my diaries,

25 but I had become aware that Garda Greene was going up 11:21

26 to -- spending a lot of time in Superintendent Murray's

27 office. Judge, based on that, without going into it, I

28 gave Garda Greene a little bit of misinformation and,

29 Judge, Superintendent Minnock, within about a week,

1 came back to me with this piece of misinformation. So  
2 I knew Garda Greene was telling stories or talking,  
3 talking shop with Superintendent Murray. Judge, after  
4 that --

5 158 Q. CHAIRMAN: Yourself and Colleen Rooney would be in this 11:21  
6 division, isn't that right!

7 A. Judge, after that --

8 159 Q. CHAIRMAN: Isn't that right?  
9 A. Yes, Judge. After that, a lot of the stuff that I told  
10 to Garda Greene, Judge, was not -- a lot of the stuff, 11:21  
11 there was a lot of porkies thrown in there,  
12 misinformation is the word there, and he was running  
13 back with this to Superintendent Murray, just for  
14 clarification.

15 CHAIRMAN: Okay. 11:22

16 160 Q. MR. MURPHY: Superintendent Murray will say that he  
17 asked Garda Greene to tell you that he was not your  
18 enemy but he was concerned for your welfare. Did Garda  
19 Greene pass that message on to you?

20 A. I don't, I mean I can't -- 11:22

21 161 Q. Is it possible that he did?  
22 A. I know Garda Greene would have spoken highly of  
23 Superintendent Murray. I knew that.

24 162 Q. At that stage did Garda Greene speak to you and suggest  
25 to you that maybe you should go for counselling? 11:22  
26 A. I don't recall that. At the time Garda Greene himself  
27 had been through his own stresses with various stuff  
28 that went on in Athlone also.

29 163 Q. Is it the case that at this stage you knew that the CMO

1 thought that you needed to go for treatment in relation  
2 to your --

3 A. Sorry?

4 164 Q. Didn't you know at this stage, in January 2016, that  
5 the CMO was recommending that you would go for 11:23  
6 treatment for your alcohol problem?

7 A. I wouldn't dispute that.

8 165 Q. Yes.

9 A. But bear in mind, there was also a serious amount of  
10 stress here. We're forgetting that part of it. 11:23

11 166 Q. If we move on then, please, back to the statement,  
12 volume 8, at page 2062. Now, on 18th January 2016, we  
13 know that Superintendent Murray applied for promotion  
14 to the rank of chief superintendent and that there had  
15 been a competition advertised on 23rd December 2015, do 11:23  
16 you see that?

17 A. Which paragraph?

18 167 Q. 2062, last paragraph, please?

19 A. Okay.

20 168 Q. You're aware at this stage, are you not, that on the 11:23  
21 18th January 2016 that Superintendent Murray applied  
22 for promotion to the rank of chief superintendent and  
23 there had been a competition advertised on 23rd  
24 December 2015?

25 A. Okay. 11:24

26 169 Q. You were aware of that at the time, were you not?

27 A. I wasn't aware of when he applied for promotion.

28 170 Q. Were you aware that there were promotions effectively  
29 being reviewed at the time?

1 A. I became aware at some stage in 2016 that there were --  
2 that he would have got -- had -- that he was on  
3 promotion lists or something. But obviously I would  
4 never have known when he applied for promotion or  
5 anything like that. The first I would have heard was 11:24  
6 when he would have appeared on a promotion list.

7 171 Q. He will say that he was called for interview on 4th May  
8 2016?

9 A. Okay.

10 172 Q. He says that he now realises that on 16th May 2016, you 11:24  
11 wrote to the Minister for Justice and Equality and  
12 complained about him?

13 A. Correct.

14 173 Q. Can I ask you to be shown the following document. In  
15 view of that, you wrote first of all on that date and I 11:25  
16 think you also wrote at a later stage, on 14/5, is that  
17 right?

18 A. I can't remember off hand. But, Judge, I wrote a  
19 number of letters to Ms. Fitzgerald, the Minister for  
20 Justice, and later Tánaiste. I had trust in 11:25  
21 Ms. Fitzgerald and that's why I wrote the letters to  
22 her.

23 174 Q. Let's just take one example. Can I ask you to turn to  
24 volume 24, 7128, please.

25 A. When I say had, had and have, she has not done anything 11:25  
26 wrong to diminish -- just for clarification, Judge.

27 175 Q. Just before we come to that, can I ask you to go back,  
28 please, first of all, to page 2063, volume 9? Have  
29 those two volumes side by side, please.

1 A. Okay.

2 176 Q. So volume 9, please.

3 A. 2063?

4 177 Q. volume 8, I beg your pardon. volume 8, at page 2063, 11:26  
5 yes, please. Do you see that on 20th May 2016, Garda  
6 Greene called to Superintendent Murray's office and he  
7 will say that he was informed by Garda Greene that he,  
8 Garda Greene, had spoken with you the night before and  
9 you had expressed dissatisfaction with the fact that  
10 Chief Superintendent Wheatley and Sergeant Guinan 11:26  
11 called to your house on 17th May 2016, do you remember  
12 that?

13 A. I remember them calling, I just don't remember this  
14 part but I'm not disputing it.

15 178 Q. Do you see the next bit: Garda Greene informed 11:26  
16 Superintendent Murray that Garda Keogh had told you --  
17 sorry, that you had told him, rather, that you were at  
18 a high level that Chief Superintendent Glacken was to  
19 be promoted to assistant commissioner and that this was  
20 something that you found very annoying? 11:27

21 A. Judge, I see in this here now -- can I just read it  
22 again? Yeah, Judge, I don't know did that even happen.

23 179 Q. Okay.

24 A. I don't know if he went -- I don't know, I can't  
25 comment on it. 11:27

26 180 Q. CHAIRMAN: Sorry, hold on. The suggestion is that you  
27 said this to Garda Greene.

28 A. Garda Greene. I may have, I don't know. I can't  
29 remember, Judge.

1 CHAIRMAN: Okay.

2 181 Q. MR. MURPHY: But in the next sentence, Garda Keogh, I  
3 think the position is Garda Greene said that you  
4 expressed a view that the CMO was going to send you  
5 back to work, that you didn't want that, because you 11:28  
6 thought people were conspiring against you. Do you  
7 remember telling him that?

8 A. Well, I would have -- I mean, I would have informed --  
9 Garda Greene would have -- I would have spoken to Garda  
10 Greene just in relation to a lot of the stuff that was 11:28  
11 going on. So I don't dispute that. And I mean, what's  
12 interesting there is, that ties in with something else,  
13 where:

14  
15 "Expressed the view that the CMO was going to send me 11:28  
16 back to work and I didn't want that."

17  
18 If you recall even back to last week, where they were  
19 trying to say the opposite, that the CMO marked me out  
20 on such a date in December as opposed to me -- and I 11:28  
21 made the point, like, I didn't want to go back into  
22 work on 21st December, I had enough. I only lasted a  
23 few days after and went sick on the 26th January.  
24 Either way, this particular part, just back, reinforces  
25 I suppose last week's stuff 11:29

26 182 Q. Garda Keogh, here we are in the middle of 2016 and  
27 Garda Greene also told Superintendent Murray that you  
28 had said you wanted to bring down the commissioner and  
29 Deputy Commissioner Ó Cualáin. Is that what you said



1 to Garda Greene at that stage?

2 A. I can't deny I would have said -- I can't remember  
3 saying it, but I certainly can't deny that that would  
4 have been something I would have said, Judge.

5 183 Q. Did you also indicate to Garda Greene that you will 11:29  
6 engage with transparency Ireland through retired Garda  
7 John Wilson?

8 A. Yes. Well, I mean that's accurate. Look, it appears  
9 accurate.

10 184 Q. Did you tell Garda Greene that you had engaged with the 11:29  
11 media in relation to the way whistleblowers were  
12 treated and that you were aware allegations were going  
13 to be made against Sergeant Yvonne Martin?

14 A. Judge, anything to do with those allegations against  
15 Sergeant Martin had nothing to do with me. That was a 11:29  
16 separate matter. I've had the opportunity to apologise  
17 to Sergeant Martin, Judge, actually -- I know I'm not  
18 allowed talk to witnesses but just at the door, I did  
19 make an apology. But this part has nothing to do with  
20 me. And Sergeant Martin was vindicated in the last 11:30  
21 part of the Tribunal. But that part, at the time I,  
22 along with most --

23 185 Q. CHAIRMAN: But Mr. Murphy's question, sorry, Garda  
24 Keogh, Mr. Murphy's question is: Did you say this?

25 A. I could have. 11:30

26 CHAIRMAN: Okay, thank you very much.

27 186 Q. MR. MURPHY: I'm not saying you were making the  
28 allegation against Sergeant Martin?

29 CHAIRMAN: No, absolutely.

1 187 Q. MR. MURPHY: I'm simply saying you were aware that an  
2 allegation was going to be made -  
3 CHAIRMAN: You were referring to.

4 188 Q. MR. MURPHY: - by somebody, isn't that right?  
5 A. That's the way it appears. 11:30

6 189 Q. would you agree with me that what you were aware of at  
7 the time was that allegation was going to be made  
8 against her in the Dáil?  
9 A. Again, I don't -- I presume but I don't know. This was  
10 nothing to do with me. 11:30

11 190 Q. CHAIRMAN: Somebody else was going to provide the  
12 information to name her in the Dáil, is that right?  
13 A. Well, it wasn't -- the other person, Judge, I know --  
14 because the other member of An Garda Síochána, Judge,  
15 who's not here, Judge, he would have had at the time a 11:31  
16 belief, like the rest of the country at the time I'm  
17 sure, but that was all dealt with and both sergeants  
18 were vindicated in the end as a result of that. It had  
19 nothing do with me.  
20 CHAIRMAN: I follow. 11:31

21 191 Q. MR. MURPHY: The superintendent took a note of that  
22 conversation, which he marked "PM 78". Can I ask you  
23 please to be shown Volume 9, at page 2530.  
24 A. Sorry, just the page?

25 192 Q. I will pass from that document, it's not the right one 11:32  
26 I want. I might come back. Perhaps I can pass on from  
27 that, please.  
28 CHAIRMAN: So we can forget 2530 for the moment at  
29 least.

1 MR. MURPHY: Yes.

2 CHAIRMAN: Okay.

3 193 Q. MR. MURPHY: Thank you. Just to come back to the  
4 position, engaged in that conversation, I think that in  
5 terms of the next development, Superintendent Murray 11:32  
6 will say that he was telephoned on 21st May 2016 by  
7 Sergeant Martin, indicating that she received a call  
8 from the commissioner's office telling her she was to  
9 be named in the Dáil and in the media and that she was  
10 very upset about that? 11:32

11 A. That part has absolutely nothing to do with me.  
12 Absolutely zero to do with me.

13 CHAIRMAN: That does appear to be the case, Mr. Murphy,  
14 doesn't it? I mean, he said that he was aware of  
15 allegations. He wasn't the source of them or anything 11:33  
16 else but he was aware of them.

17 194 Q. MR. MURPHY: I am just putting to him that he was  
18 aware, no more than that, Chairman, yes.

19 A. I had the same awareness as a lot of people.

20 CHAIRMAN: I understand that. I am understanding you 11:33  
21 simply said, look, I knew about them but they didn't  
22 emanate from me, I wasn't backing them up or anything  
23 of that kind but I had heard of them, as other people  
24 had. Okay.

25 195 Q. MR. MURPHY: By that date I think you had written, I 11:33  
26 think it was your first letter to the Minister.  
27 Perhaps you could, please, be shown 3292 at Volume 11.  
28 If I can ask you to turn to page 3293?

29 A. 3293, yes.

1 196 Q. I want to focus on the Superintendent Murray references  
2 only, please, for this purpose. In the second  
3 paragraph I think you complain about Superintendent  
4 Murray and the fact that you were confined to desk  
5 duties in the public office due to going intermittently 11:34  
6 sick with work related stress?  
7 A. Okay.  
8 197 Q. You also say:  
9  
10 "Superintendent Murray had me recorded as sick with the 11:34  
11 flu."  
12  
13 Do you see that? The second paragraph, last line?  
14 A. Yes.  
15 198 Q. In terms of the issues, if you turn down two 11:34  
16 paragraphs, you will see:  
17  
18 "On 9/12/2015, Superintendent Pat Murray held a case  
19 conference in Garda headquarters in relation me to  
20 going sick with flu, this was attended by three members 11:35  
21 of An Garda Síochána, three civilians and a Garda  
22 doctor."  
23  
24 A. That's what I wrote.  
25 199 Q. If you turn forward, please, to page 3296, which is the 11:35  
26 last letter. There you raise three points: You ask  
27 that your Garda file be given to GSOC, number one; you  
28 request a copy of the Ó Cualáin report containing his  
29 findings of your allegations should be given to you;

1 and third, you ask the Minister to give some  
2 consideration to ensuring that a person in your  
3 position, a whistleblower, who is on sick leave on work  
4 related stress should not be penalised financially.  
5 You make reference to pay which you identified as 11:35  
6 penalisation?

7 A. Yes.

8 200 Q. That's the letter that you sent to the Minister. That  
9 occurred I think four days between the conversation  
10 between Garda Greene and the superintendent on the 20th 11:35  
11 May, that we just discussed?

12 A. Okay. Actually, I forgot to say, Judge, in relation to  
13 point one there, to have an a Garda file handed over to  
14 GSOC without delay, Judge, when GSOC requested the  
15 Garda file, the Guards didn't give it to them 11:36  
16 straightaway. It took five months and political  
17 pressure. It was actually Wallace, he did that much  
18 shouting about it in the Dáil, that was the only reason  
19 that the guards actually gave, five months later from  
20 the GSOC request, they handed over that file to GSOC. 11:36  
21 This is the file in relation to the conspiracy to  
22 supply heroin.

23 201 Q. Just one more point before we come to the next phase of  
24 this progression, Garda Keogh. On 24th May 2016,  
25 Superintendent Murray will say that Inspector Minnock 11:36  
26 reported that he called to you at your home on a  
27 welfare visit and that he found you drunk and drinking  
28 from a can of cider, do you remember that visit?

29 A. I don't remember it. But just what page are we on

1 here?

2 202 Q. That's at page 2063, this is statement of  
3 Superintendent Murray, Volume 8.

4 A. Yeah.

5 203 Q. So that in that situation Inspector Minnock reported 11:37  
6 back that you had spoken to him, to Inspector Minnock,  
7 about bringing down the commissioner, then Deputy  
8 Commissioner Ó Cualáin and Superintendent Murray. Do  
9 you recall saying that to him?

10 A. I don't recall it but I see that's said there. It 11:37  
11 would be the kind of stuff I probably would have said,  
12 Judge.

13 204 Q. So I think it's fair to say that from that answer, that  
14 the Chairman can take it that certainly as of that date  
15 it was your intention to target Superintendent Murray 11:38  
16 and to bring him down?

17 A. Judge, the second line there, I mean, I have no problem  
18 in reading this out again, like Inspector Minnock  
19 reported he called to my house:  
20  
21 "...on a welfare visit and found him drunk and drinking  
22 from a can of cider."  
23  
24 Drunk and I'm on about this stuff. I mean... Like, you  
25 know, do I need to even go -- I mean, I'm not disputing 11:38  
26 it, it is certainly the kind of thing I would have  
27 said, Judge. I don't remember saying it but it would  
28 be definitely the kind of thing I would have said,  
29 Judge

1 205 Q. Yes. And that's because that's what you thought at the  
2 time, isn't it, Garda Keogh?

3 A. Well, you see, where are we here? We're in 2016?

4 206 Q. Yes.

5 A. My awareness to what's going on internally in the 11:38  
6 Guards is growing and what I thought was mild  
7 corruption was an understatement.

8 207 Q. Garda Keogh, can we just focus on the words you use  
9 here "bringing down", can I put it to you that that  
10 suggests that you wanted to end the careers of the 11:39  
11 commissioner, Deputy Commissioner Ó Cualáin and  
12 Superintendent Murray? Isn't that what "bringing down"  
13 means?

14 A. That's what "bringing down" I suppose would mean but, I  
15 mean... 11:39

16 208 Q. So it wasn't a warning shot or a general warning to  
17 behave better in the future, it was to bring their  
18 careers to an end?

19 A. Judge, at that point in time, under commissioner Nóirín  
20 O'Sullivan's watch, where she publicly, from 9th May 11:39  
21 2014, said whistleblowers will be supported. Judge, I  
22 was being butchered, okay. Donal Ó Cualáin, I have  
23 always said, was trying to do a cover up investigation  
24 in relation to the heroin thing. Superintendent  
25 Murray, I've always maintained was a mere -- I haven't 11:40  
26 used the word before, but just a lackey for Assistant  
27 Commissioner Ó Cualáin to get me out of Athlone so he  
28 would have freer rein to do a cover up.

29 209 Q. Garda Keogh, obviously I disagree with you in those

1 opinions that you have expressed, but I think you  
2 accept, do you not, for the Chairman, that as of this  
3 date, May of 2016, your mind was made up, your mission  
4 was to bring down Superintendent Murray, bring an end  
5 to his career? 11:40

6 A. Judge...

7 210 Q. If you could, isn't that right?

8 A. Well, I mean, look, I am in serious conflict with all  
9 these people at this period in time, Judge.

10 211 Q. But you're also a person, Garda Keogh, who has 11:40  
11 repeatedly over the last few days stressed your  
12 entitlement to fair procedures and to be given notice  
13 and to be treated fairly. I have to suggest to you  
14 what's is going on here is quite different. What you  
15 are doing here is indicating an intention to get these 11:40  
16 people?

17 A. Judge --

18 212 Q. By whatever means?

19 A. Judge, that would be the natural instinct for any  
20 person in my -- there's two natural instincts in a 11:41  
21 human being and it's fight or flight. One is pack up,  
22 run, leave the country. Two, is stand my ground and  
23 fight. And, Judge, that's why I am here today in  
24 relation to this. I mean, I have plenty of evidence to  
25 reinforce my beliefs and pretty much put down in 11:41  
26 general all these allegations about these three  
27 characters, I --

28 213 Q. You see, Garda Keogh, the position is that at this  
29 stage you weren't defending yourself, you were on sick



1 leave. The real position here, I have to suggest to  
2 you, is that you were now forming an intention to  
3 attack people, to bring them down and to destroy them.  
4 A. I am on sick leave.  
5 214 Q. That's not a defence. 11:41  
6 A. Judge, I was effectively driven out of work in the end.  
7 That's the way I perceive it. I may be wrong in that,  
8 but that's the way I perceived it.  
9 215 Q. You see, I have to disagree with you because you do  
10 accept that the objective evidence is that the CMO took 11:42  
11 a view about you in relation to your alcohol problems  
12 and recommended you attend for alcohol treatment?  
13 A. He took --  
14 216 Q. That was the position six months before this, isn't  
15 that right? 11:42  
16 A. Judge, he took that view because he wasn't even aware  
17 of work related stress until I -- the last date that I  
18 met him, was it 19th December 2012, I brought a file up  
19 with me, Judge, it was that thick, with all the  
20 documents and we had the discussion about stress and he 11:42  
21 said, why aren't you out with work related stress and I  
22 said I am. He said, is that on your certs? He didn't  
23 know. I said, it is. He showed me the document then,  
24 which is in the files, which had viral flu written the  
25 whole way about it, so he didn't know anything about 11:42  
26 work related stress.  
27 217 Q. Garda Keogh, it's very clear that whatever you said  
28 about stress, you accepted this earlier, that the  
29 treatment you were recommended to undergo was addiction

1 treatment in relation to alcohol?

2 A. Yes.

3 218 Q. And that the reason you were out of work in May 2016 is  
4 because of that particular medical diagnosis, isn't  
5 that right? 11:43

6 A. Yes. But again, why the drink? And even the patterns  
7 of when I was drinking, Judge, which I noted in my  
8 diary, it always appeared to be the day before I was  
9 due to go back on work period, was when I would start  
10 drinking. Because I was just under that much pressure 11:43  
11 and the thoughts of having to go back into work on  
12 those days were unbearable. Unfortunately I did --  
13 look, I'm not the first Irish man to have this problem  
14 and I won't be the last.

15 219 Q. Could I ask you see to volume 9, please, page 2537? 11:43  
16 This is a note of 24/5/2016 which Superintendent Murray  
17 prepared. There are two sections. First, can I ask  
18 you to just look at the upper section, where you  
19 recorded that he, Superintendent Murray asked Inspector  
20 Minnock to call to you in relation to your welfare. Do 11:44  
21 you see that. I think you accept that Inspector  
22 Minnock did call to you about your welfare?

23 A. Judge, I --

24 220 Q. Did he call to you about welfare?

25 A. Judge, it's on paper about welfare, I said this 11:44  
26 already --

27 221 Q. Garda Keogh --

28 A. No, I have to answer this, please, if I may.

29 222 Q. CHAIRMAN: Yes.

1 A. In relation to Superintendent Minnock, when he was  
2 Inspector Minnock under Noreen McBrien, he was somebody  
3 I trusted. When Superintendent Murray arrived, Judge,  
4 I became aware I could not trust Inspector Minnock.  
5 There was a change there, Judge. So what is written 11:45  
6 down as calling out for welfare, transpires to be more  
7 spying issues, because everything is documented and  
8 everything is noted. Whatever I say is written down  
9 and all the rest. So, this thing about welfare,  
10 welfare is just a bail for a spy mission on this part. 11:45  
11 223 Q. Again I have to suggest to you that's another paranoid  
12 response because Inspector Minnock will say that he  
13 called to you on his way home from work, I think he  
14 lived in your general area, is that right?  
15 A. Yes, as I said, Judge, Inspector Minnock, in Noreen 11:45  
16 McBrien's time, there was no problem with him calling  
17 up. Towards the end under Superintendent Murray's  
18 tenor, I actually told Inspector Minnock, I don't want  
19 you calling up here anymore and I tried to tell him,  
20 stay out of this. Not try, I used to refer to him as 11:45  
21 cig, which is still a word that's used in An Garda  
22 Síochána, I said cig, can you please stay out of this,  
23 this is going to get messy.  
24 224 Q. CHAIRMAN: what did you mean by this?  
25 A. This whole episode, this whole thing. 11:46  
26 225 Q. CHAIRMAN: what was the whole thing?  
27 A. Everything we are dealing with here to do with all of  
28 this.  
29 226 Q. CHAIRMAN: what was he to stay out of?

1 A. Stay out of, not to be calling, not to be getting  
2 involved, stay out of all the rest. I was trying to  
3 keep him out of it, Judge.

4 227 Q. MR. MURPHY: when you say it, Garda Keogh, were you 11:46  
5 trying to keep him out of the escalating plan on your  
6 part to try and destroy and take out people?

7 A. Not at all. Because, Judge, at this point in time,  
8 we're in 2016, there's the -- I'm just trying to think,  
9 okay, there is the GSOC investigation is in train,  
10 there's the Garda disciplinary investigation, and then 11:46  
11 there's the bullying and harassment investigation. So  
12 there's the three of those things are in play at this  
13 period of time.

14 228 Q. Effectively at this time you're at home and you're  
15 drinking? 11:47

16 A. Yeah. well, three of these large investigations going  
17 on, I mean, and there is all this, this is all going  
18 on. Unfortunately, where Mr. Murphy is on about  
19 reality and my perception of reality, my reality is  
20 there is these three massive investigations, I mean, 11:47  
21 that are -- and none of them are simple, none of those  
22 investigations, not one of them are simple, they're  
23 very complicated. All three of them are extremely  
24 complicated investigations.

25 229 Q. Garda Keogh, could be shown volume 4, please, at page 11:47  
26 702. Chairman, this is the statement of Inspector  
27 Minnock?

28 CHAIRMAN: Yes.

29 230 Q. MR. MURPHY: Do you see this refers to the visit on the

1 24th May 2016, do you see that? Page 702?

2 A. Up the top, yeah.

3 231 Q. Yes. Just before we go there, can I ask you to turn  
4 back to the previous page, please, that's page 701?

5 A. Okay. Paragraph? 11:48

6 232 Q. The last paragraph, please.

7 CHAIRMAN: "At some point", is that the one.

8 233 Q. MR. MURPHY: Yes, "At some point", this is on May 20th.  
9 He will say that at some point he was asked to liaise  
10 with you and to ensure that you had appropriate welfare 11:48  
11 supports.

12 A. Yeah, I don't dispute that.

13 234 Q. Fine. I think he said that Superintendent McBrien had  
14 been linking in with you.

15 A. Yes. 11:48

16 235 Q. He will say that he had a conversation with  
17 Superintendent Murray?

18 A. Yes.

19 236 Q. In relation to your welfare supports?

20 A. Okay. 11:49

21 237 Q. In fact, he said that you lived outside Tullamore,  
22 making it more convenient for house calls and he also  
23 felt at that time that he had a good rapport with you?

24 A. That was very correct, at that time we did have a good  
25 rapport and there's absolutely no issue there. 11:49

26 238 Q. He thinks that his first visit to you in that capacity  
27 was on 24th May 2016, is that possible?

28 A. That's is possible.

29 239 Q. Just turning over the page, please. He will say that

1 he called to you on the way home from work at 5:45pm  
2 and that on arrival you were on the phone and you were  
3 talking to Mick Quinn, your welfare officer?  
4 A. Okay.  
5 240 Q. He will say that you handed him the phone and that he 11:49  
6 had a brief word with Mick Quinn, your welfare officer?  
7 A. Right.  
8 241 Q. So I think you agree that the discussion was likely to  
9 be about your welfare?  
10 A. Yeah, at this period I have no issue, yeah. 11:49  
11 242 Q. I think you invited him into the house?  
12 A. That would -- that would have -- as I said, at that  
13 point in time I had good time for Superintendent  
14 Minnock.  
15 243 Q. Inspector Minnock will say that although you were 11:50  
16 drinking, he was glad to see that you were linking in  
17 with Mick Quinn?  
18 A. Yeah.  
19 244 Q. And that he was glad to see that you were in company?  
20 A. Yeah. 11:50  
21 245 Q. I think he also notes that your mother was in the  
22 kitchen and he was introduced to her?  
23 A. Okay.  
24 246 Q. And there was some general chat about her?  
25 A. Right. 11:50  
26 247 Q. I think he will say that you were keen to show him a  
27 letter from the Minister's office which referred to  
28 some issue being examined by GSOC?  
29 A. I see that.

1 248 Q. And he passed that off quickly.  
2 A. Okay.  
3 249 Q. Then he also spoke about Inspector Farrell and  
4 Superintendent Murray?  
5 A. Right. 11:50  
6 250 Q. As management in Athlone. Then he also moved on to  
7 talk about the commissioner and Commissioner Ó Cualáin  
8 and contacts that you were having with some TDs?  
9 A. Right.  
10 251 Q. He asked you for your mobile number, which you weren't 11:50  
11 sure of your number?  
12 A. That would be -- that would be quite possible, Judge.  
13 I wouldn't even know my number now, because I was  
14 changing phone numbers that often that I actually  
15 wouldn't know any of the phone numbers. 11:51  
16 252 Q. I think you spoke about management to him as well. So,  
17 if we just look at the end, he will say in the course  
18 of his evidence that you were in good spirits although  
19 you did appear to be under the influence of alcohol. I  
20 think you would accept that? 11:51  
21 A. I have no issue with that.  
22 253 Q. So if we can just move on then to 25th May 2016. If I  
23 could ask you, please, to go back to volume 8, page  
24 2063.  
25 CHAIRMAN: I am looking for a convenient time to take a 11:51  
26 break, Mr. Murphy.  
27 MR. MURPHY: This might be the time, Judge.  
28 CHAIRMAN: If this is it. I don't want to impede your  
29 flow.

1 MR. MURPHY: This would be a natural time, Chairman.  
2 CHAIRMAN: Thank you very much. That seems sensible.  
3 You will be happy to have a little break at this point.  
4 In the meantime, if you want -- we have already  
5 referred to 2063, isn't that right? 11:52  
6 MR. MURPHY: Yes.  
7 CHAIRMAN: And you're going to come back to it now.  
8 Okay. All right. So we will say 12:05. Thank you.  
9  
10 THE HEARING THEN ADJOURNED BRIEFLY AND RESUMED AS 12:05  
11 FOLLOWS:  
12  
13 CHAIRMAN: Thank you.  
14 MR. MURPHY: Chairman. Garda Keogh, I think if we can  
15 go to page 2063, please. I think on the wednesday, 12:06  
16 25th May 2016, Superintendent Murray received  
17 notification that he was successful in the promotion  
18 competition for chief superintendent and he was placed  
19 at number 14 on a list of 18 people selected for  
20 promotion in that rank. 12:06  
21 A. Yes.  
22 254 Q. When did you become aware of that development?  
23 A. Whenever the list came out, I would have been contacted  
24 by somebody who would have informed me, I presume.  
25 255 Q. I think during that period, if I can ask you to turn 12:06  
26 over to 2064, did you give any interview to the Sunday  
27 Business Post during that time?  
28 A. Yes. The only time I ever went on record was that  
29 interview with the media, it was with journalist



1 Francesca Comyn. Judge, to go back, under the  
2 Protected Disclosures Act, Judge, normally a guard is  
3 not allowed speak to the media. But, under the  
4 Protected Disclosures Act there is a provision whereby,  
5 if you have exhausted all avenues and there's nothing 12:07  
6 happening, you can go to the media. Judge, I think,  
7 from recollection, this is in a period of time where  
8 the Guards -- where I have reported the matter to GSOC  
9 and the Guards are not sending the file to GSOC. There  
10 was five months of a delay, as I previously said. 12:07

11 256 Q. CHAIRMAN: Can I stop you one second?  
12 A. Yes, Judge.

13 257 Q. CHAIRMAN: Up to now Mr. Murphy has not made a  
14 complaint, has not suggested it was unlawful, has not  
15 suggested it was wrong or anything else. Maybe he will 12:08  
16 come to that and maybe will you have to make that  
17 defence. If you need to, come back and we will discuss  
18 it or you can -- okay, don't worry about what's coming.  
19 You gave an interview to Francesca Comyn of the Sunday  
20 Business Post? 12:08  
21 A. Yes, Judge.

22 258 Q. MR. MURPHY: This is at a period after you become aware  
23 that Superintendent Murray is on a promotions list?  
24 A. I can't remember, Judge.

25 259 Q. Could I ask you please to turn forward, please, to page 12:08  
26 2546, please? That's contained in volume 9. You will  
27 see the headline is:  
28  
29 "Internal probe into Garda whistleblower claims

1           I aunched. "

2

3           A.    Yeah.

4   260   Q.    Can I ask you to turn to the next page, 2547, please.

5           In the middle of the page you will see the continuation 12:09

6           of that article. Can I just draw your attention to the

7           second paragraph, sorry the third paragraph under that

8           column, last section, where you're recorded as saying

9           that senior officers have subjected your:

10

12:09

11           "...work to an unreasonable degree of scrutiny and

12           criticism and even touted members of the community to

13           make complaints against him, one of the senior officers

14           was listed for promotion and Keogh is currently out on

15           sick leave. "

12:09

16

17           A.    Yeah.

18   261   Q.    So, will you agree me that it appears that you made

19           reference, although not by name, to Superintendent

20           Murray in the course of that interview? 12:09

21           A.    That appears to be the case, Judge.

22   262   Q.    So we can take it then that as of that date, 12th June

23           2016, you were aware of the existence of the promotion

24           and you were publicising your dissatisfaction with

25           Superintendent Murray in that regard? 12:10

26           A.    Yes. Now, just for clarification, as I said --

27           CHAIRMAN: Do you mind going back for two seconds?

28           Where is that, Mr. Murphy? I am missing that.

29           MR. MURPHY: Chairman if you look in the fourth column

1 on page --

2 CHAIRMAN: The last column, yes. That's is all right.

3 Mr. Kavanagh is trying to help me.

4 MR. MURPHY: If you look please, Chairman, in the third

5 column, the last three lines. 12:10

6 CHAIRMAN: "It is understood".

7 MR. MURPHY: No, the paragraphs begins "having had".

8 CHAIRMAN: Oh, sorry, yes.

9

10 "Having had an exemplary record as a young guard.." 12:10

11

12 MR. MURPHY: If you read down, Judge, through there,

13 you will see the end of the paragraph, where I started:

14

15 "He also alleges that senior officers subjected his 12:10

16 work to an unreasonable degree of scrutiny and

17 criticism and even touted members of the community to

18 make complaints against him. One of the senior

19 officers in question is listed for promotion. Keogh is

20 currently out on sick leave." 12:11

21

22 CHAIRMAN: Thank you. Very good. Thank you very much.

23 Okay.

24 263 Q. MR. MURPHY: I think on the 14th June you wrote to the

25 Minister for Justice. That is a letter which you have 12:11

26 seen briefly before?

27 A. Can I close this?

28 264 Q. Can I ask you, please, to be shown volume 24.

29 CHAIRMAN: I think we are finished with that one now.

1 Yes, the next one, Mr. Murphy, is?  
2 MR. MURPHY: I will come back to this point. I just  
3 really making the point that the promotions issue was  
4 being publicised in the newspapers.  
5 A. Can I just get the page? 12:11  
6 265 Q. Please, if I could have page 7128 on the screen,  
7 please. Garda Keogh, in the course of this letter you  
8 wrote to the Minister, and I think in the first page  
9 you made your complaints against Superintendent Pat  
10 Murray by name. Do you see in the second paragraph, 12:12  
11 you say:  
12  
13 "I was recorded as being out sick with flu by  
14 Superintendent Pat Murray, despite my doctor's  
15 certification of my condition as work related stress." 12:12  
16  
17 Do you see that?  
18 A. I see that. And Judge, I understand it should have  
19 been under his watch, as opposed to --  
20 266 Q. I think you accept that he wasn't responsible for 12:12  
21 recording matters, as we discussed on previous days?  
22 A. Yes, but under his watch, is what I should have written  
23 there.  
24 267 Q. In terms of the next page, 7129, at the very last line  
25 you make reference to: 12:13  
26  
27 "Disciplinary breaches Garda management got me on were  
28 questionable;  
29 1. The tax bracket category of my private car was

1 nothing short of vindictive.  
2 2. For ringing in sick where I made a statement  
3 accepting that I had erred."  
4

5 Do you see that?

12:13

6 A. Yes.

7 268 Q. You say:

8  
9 "When I was given the opportunity to appeal this, Garda  
10 management wouldn't give me a copy of my statement  
11 which I had requested, due to the fact that I said the  
12 amount of stress I was under, while they were  
13 deliberately recording me as sick with the flu."  
14

12:13

15 So again there is that reference to "deliberately  
16 recording", I think you accept now that there wasn't  
17 deliberate recording?

12:13

18 A. Oh no, I don't accept that at all. I have accepted to  
19 a certain point, Judge, we have gone through all this,  
20 I've said up to a certain point, fair enough, there may  
21 have been a mistake, but after a certain period --

12:13

22 CHAIRMAN: If you are satisfied to let the debate on  
23 the sick leave issue rest as it stood, I think we will  
24 leave it as a stood, Mr. Murphy. I think that's the  
25 sensible thing, Mr. Kelly, rather than have a go at it  
26 every so often.

12:13

27 MR. KELLY: I am very much in favour of that. It  
28 doesn't actually gain by being beaten around all the  
29 time.

1 CHAIRMAN: Mr. Kelly, obviously if there is any issue  
2 you want to revisit, clearly that's a matter entirely  
3 for you. Anyway, we will ignore previous debates,  
4 Mr. Murphy, except where they're strictly relevant to  
5 the present. 12:14

6 MR. MURPHY: Certainly, Judge.

7 269 Q. Could I ask you then to turn forward to page 7130?  
8 A. 37?

9 270 Q. 7130, in same volume, 24.

10 CHAIRMAN: No, forget the 3, it's 7130, the next page. 12:14  
11 A. Yes.

12 271 Q. MR. MURPHY: Do you see towards the end of the letter  
13 there is a sentence beginning:  
14  
15 "Of course it will come as no surprise that Garda 12:14  
16 commissioners were warning Superintendent Murray by way  
17 of promotion from superintendent to chief  
18 superintendent whilst the harassment allegations are  
19 being investigated prior to the policing authority  
20 taking over the promotions procedure in relation to An 12:14  
21 Garda Síochána."  
22

23 Do you see that?

24 A. Yes.

25 272 Q. That's the accusation you made to the Minister for 12:15  
26 Justice at that stage?

27 A. Yes.

28 273 Q. I have to suggest to you again that you are effectively  
29 seeking to communicate to the Minister in an effort to

1 stop the promotion, isn't that right?

2 A. Em, I am pointing out -- there's an issue here and I am  
3 pointing it out to the Minister. I am entitled to do  
4 that. That's -- I mean, that's -- I am entitled to do  
5 that. I wrote a letter to the Minister, everything is 12:15  
6 there in writing. I still stand by that.

7 274 Q. Insofar as you are saying that harassment allegations  
8 are been investigated, which harassment allegations are  
9 they? Superintendent Murray has been promoted whilst  
10 the harassment allegations have been investigated? 12:15

11 A. I presume this is after I reported the -- initially  
12 report the harassment to Chief Superintendent Tony  
13 McLoughlin, which I don't have the date off hand. It  
14 was the first time I met Chief Superintendent  
15 McLoughlin. But I would accept I don't get to make a 12:16  
16 statement until, is it, March '17. But that wasn't  
17 my -- that was out of my control, when I got to make a  
18 statement. I was pushing for a long time to -- in  
19 relation to the bullying and harassment.

20 275 Q. would you agree with me that that phrase gives the 12:16  
21 impression to whoever read it at the time that  
22 harassment allegations were being investigated?

23 A. Well, they should have been investigated then.

24 276 Q. That's a different thing from saying they are being  
25 investigated. You said they are being investigated, 12:16  
26 that was incorrect, wasn't it?

27 A. May have -- I may have not worded it correct but the  
28 gist of it is correct, Judge.

29 277 Q. Well, there was no gist of it being correct at that

1 time. On that date in 2016, is it not the case that  
2 the harassment allegations were not being investigated?  
3 A. No, no, Judge, I had reported bullying and harassment,  
4 I had reported it. I accept that the actual  
5 investigation hadn't taken place, but I had reported 12:16  
6 it.  
7 278 Q. Weren't you at the same time complaining that there  
8 wasn't an investigation taking place. Later on,  
9 haven't we have seen in earlier issues that you were  
10 complaining about a delay in the investigation in 2017? 12:17  
11 A. Yeah.  
12 279 Q. So here we are in the middle of 2016. I just have to  
13 suggest to you that that's a very misleading statement  
14 that you incorporated in your letter?  
15 A. No, it's not. 12:17  
16 280 Q. And do you see at the bottom on the left-hand side --  
17 A. No, it's not.  
18 281 Q. You cc'd the letter to GSOC, the Policing Authority and  
19 to Clare Daly TD, do you see that?  
20 A. Yes. 12:17  
21 282 Q. Did Deputy Daly suggest to you that you should write  
22 this letter to the Minister?  
23 A. No, I don't think so. I don't think so, no, this is a  
24 letter I would have done I'd say completely myself,  
25 from recollection. 12:17  
26 283 Q. I see. But do you see here, I have to suggest to you  
27 that this begins to appear like a pincer movement by  
28 you, where you are effectively triggering Deputy Daly  
29 and Deputy Wallace to make speeches in the Dáil and now





1 this bullying and harassment policy. Sorry, you  
2 touched -- the second part of the question?

3 286 Q. Yes, I was suggesting to you that you are enlisting,  
4 effectively writing to all of these people complaining  
5 about Superintendent Murray, because you are intending 12:19  
6 to bring his career to an end?

7 A. No, no, no. Judge, what that is, even under the old  
8 the Garda Síochána Act and I didn't know this at the  
9 time, I know it now, one wouldn't get promoted if there  
10 was an active complaint against them. But equally, 12:19  
11 under this new -- the new promotion thing or  
12 whatever -- Judge, Superintendent Murray, there's no  
13 issue with him being promoted, but after it's  
14 investigated. That's my point. He should have been  
15 investigated and then promoted. No issue. This craic 12:20  
16 where they know there's an allegation of bullying and  
17 harassment, they know I'm trying to invoke the bullying  
18 and harassment policy and then afterwards it takes, I  
19 think, about a year before I get to actually make the  
20 statement. But that's out of my hands, that was out of 12:20  
21 my control. That's why I was writing to Minister  
22 Fitzgerald in relation to this, because if I wasn't  
23 informing Minister Fitzgerald what was going on, I  
24 doubt Garda management were informing her what was  
25 going on. 12:20

26 287 Q. You see, Garda Keogh, I have to suggest to you that  
27 it's a bit more than that, because by this time you  
28 have given information which has resulted in  
29 Superintendent Murray being named in the Dáil, being

1 accused of corruption, of massaging the crime figures,  
2 and now you're writing to the Minister, who we know has  
3 responsibility for An Garda Síochána, and to the other  
4 authorities and you're adding cumulatively to this  
5 complaint in relation to his promotion. I have to 12:20  
6 suggest to you that all of this was calculated to try  
7 and stop Superintendent Murray from being promoted?

8 A. Judge, again, it's not as simple as that. My point is:  
9 Promote him but promote him after you do the  
10 investigation. If you are going to promote him, do it 12:21  
11 right, promote him after. Not what happened. And what  
12 has subsequently happened was all done wrong, in my  
13 view, Judge.

14 288 Q. So is it your evidence to the Chairman here today that  
15 you weren't trying to interfere with Superintendent 12:21  
16 Murray's promotion?

17 A. Judge, I didn't want him to be promoted while there was  
18 an active investigation, or there should have been  
19 investigation, a matter which I had already reported.  
20 I believe that was wrong. It was wrong the way the 12:21  
21 Garda management were dealing with this.

22 289 Q. Garda Keogh, earlier this morning did you not agree  
23 with me that bringing down was what you were trying to  
24 do and that you accepted that bringing down was  
25 bringing the person's career to an end, do you remember 12:21  
26 that?

27 A. Bringing down -- no, but bringing down and preventing  
28 from promotion are two very different things. Bringing  
29 down -- Judge, bringing someone down, I mean, here I am



1 documents, in letters in relation to Superintendent  
2 Murray and other parties which he wasn't CCing to me.

3 294 Q. Garda Keogh, in relation to this correspondence, was  
4 Transparency Ireland involved in assisting you in  
5 relation to this letter? 12:23

6 A. No, definitely not. No, I met Transparency, Judge,  
7 International Ireland, just in relation to -- that was  
8 -- I think was it around 2016 or something like that.  
9 But it was more just I gave them my view of whatever  
10 was going on. That was really it. 12:24

11 295 Q. Did Deputies Daly or Wallace help you to, for example,  
12 type this letter?

13 A. Absolutely not. And, Judge, in relation to this  
14 letter, Judge, I see, I just notice the way this is  
15 printed, there's a line down on this printer, on the 12:24  
16 right-hand side of this printer, so that's a domestic  
17 printer. I know where that printer is. That printer  
18 is somewhere in Tullamore and it seems to always leave  
19 that line. This was printed -- this was done by me,  
20 Judge, and nobody else, this letter. 12:24

21 296 Q. Can we move forward then, please, to volume 1, at page  
22 345? This is a letter that you wrote to the Minister  
23 on 2/9/2016, in handwriting.

24 A. Yes.

25 297 Q. Had you no typewriter or computer at that stage? 12:25

26 A. No, this is the only letter I sent Ms. Fitzgerald in  
27 longhand, Judge, because it was an urgent letter and I  
28 don't think I had even time to type this letter.

29 298 Q. In terms of this letter, was this letter a letter that

1           you received any help with from any person, like  
2           Transparency Ireland?

3       A.    Oh, no, no. This was -- as I said, whatever I had  
4           heard -- can I read the contents of the letter first,  
5           Judge? 12:25

6 299 Q.    This is your letter, Garda Keogh?

7       A.    It is.

8 300 Q.    You are familiar with it?

9       A.    There's no question, I just want to read what's in it.

10       CHAIRMAN: Familiarise yourself with it. Take a 12:25  
11       moment. If that's what you want to do, yes, take a  
12       moment, of course.

13       A.    Judge, can I read this letter into -- can I read this  
14       letter?

15       CHAIRMAN: Only if Mr. Murphy asks you to read it. He 12:26  
16       is cross-examining, so it's a matter for him.

17 301 Q.    MR. MURPHY: I'm going to ask you questions about the  
18       letter, Garda Keogh.

19       A.    Okay.

20 302 Q.    First of all, you agree that the letter was written by 12:26  
21       you in relation to the promotion of Superintendent Pat  
22       Murray?

23       A.    Yes.

24 303 Q.    Second, do you agree with me that it's clear as of that  
25       date you knew that the promotion was waiting to be 12:26  
26       signed off by the cabinet?

27       A.    That's correct. And that's -- from recollection,  
28       before I even had read the letter, I said this was an  
29       urgent letter, that I didn't even have time to type.

1 304 Q. How did you know it was about to be signed off by the  
2 cabinet?

3 A. I can't remember how I knew that. But I found -- I  
4 obviously found that out, possibly that day.

5 305 Q. Yes. 12:27

6 A. I don't know, I presume that.

7 306 Q. Who could have told you about that kind of information  
8 before it went to the cabinet?

9 A. I don't know. I don't know.

10 307 Q. I mean, you agree with me it wasn't on the radio? 12:27

11 A. Oh!

12 308 Q. It wasn't. So it had to be somebody who was very close  
13 to the organisation at a very high level in An Garda  
14 Síochána or else to the Cabinet. Where did you find  
15 the information? 12:27

16 A. It was someone in a Government department. There's  
17 many other aspects that --

18 309 Q. Who was it then?

19 A. I don't know, I actually do not know. All I know is, I  
20 got this information and I wrote -- this is back in 12:27  
21 2016. I recall -- actually, I recall writing the  
22 letter just on the kitchen table, I scribbled it down.  
23 It is a letter to the Minister, where I didn't even go  
24 to type it or anything like that, it was just urgent,  
25 wrote it down and posted it immediately. And that was 12:27  
26 it.

27 310 Q. So did someone tell you, somebody with inside  
28 information tell you that the matter was now about to  
29 be signed off by the Cabinet and that was why you are

1 writing so urgently?

2 A. That would be correct.

3 311 Q. So who was the person who told you?

4 A. Well, can I check my diary, Judge.

5 312 Q. CHAIRMAN: Please do. 12:28

6 A. And see if I can be of assistance.

7 313 Q. CHAIRMAN: What does your diary say?

8 A. On the 1st I have:

9

10 "Post letter to Chief Superintendent McLoughlin 12:28

11 re harassment."

12

13 And on the 2nd I have:

14

15 "Post letter to Tánaiste re Pat Murray harassment." 12:29

16

17 314 Q. MR. MURPHY: So, I think you will agree with me, this

18 is a big deal, Garda Keogh, this was a letter that you

19 were writing to the Minister, a very important in your

20 life as Garda and a very important person in the 12:29

21 community, isn't that right?

22 A. A very important person in the State because she's also

23 had the Tánaiste.

24 315 Q. You're also writing it in great haste because you

25 considered it to be urgent that you bring this matter 12:29

26 to the attention of the Minister?

27 A. That's correct.

28 316 Q. You had also received information of a very delicate

29 kind to indicate that this was just about to be



1 assessed by the cabinet. Now, who told you?  
2 A. Judge, I go back to -- can I go back the month before,  
3 if I can even find out if I noted who... Judge, I don't  
4 know, all I know is that I became aware of it, I don't  
5 have it recorded how I became aware of it but I became 12:30  
6 aware of it.  
7 317 Q. Garda Keogh, you've given us evidence you have problems  
8 with memory, but I have to suggest to you, it's  
9 incredible that you don't remember who told you this  
10 information? 12:30  
11 A. There's an awful lot of information that I've have  
12 heard and stuff that I can't remember.  
13 318 Q. Why don't you think about it for a moment. You  
14 mentioned your circle of trust a few days ago, was it  
15 somebody in your circle of trust that told you about 12:30  
16 this information?  
17 A. I mean it could have been.  
18 319 Q. Could have been?  
19 A. Could have been.  
20 320 Q. So who was in circle of trust at that stage? 12:30  
21 A. Just people you wouldn't even know about and that are  
22 not in the documents in my circle.  
23 321 Q. Deputy wallace isn't in the cabinet, is he?  
24 A. Sorry?  
25 322 Q. Deputy wallace is not in the cabinet? 12:30  
26 A. No.  
27 323 Q. On in higher management of An Garda Síochána?  
28 A. No.  
29 324 Q. Deputy Daly isn't either?

1 A. Correct.

2 325 Q. Deputy wallace isn't either -- Deputy Flanagan, rather?

3 A. No.

4 326 Q. So, who else was in the circle of trust at that time,  
5 for example, was in Garda management? 12:30

6 MR. MCGUINNESS: Chairman, I wonder is it relevant to  
7 keep persisting in this enquiry? The letter is  
8 written, he said he became aware of the information.

9 CHAIRMAN: Mr. Murphy is suggesting that he does know  
10 but he won't say. 12:31

11 MR. MURPHY: I am.

12 CHAIRMAN: That's, rather, what Mr. Murphy is implying,  
13 where we are.

14 MR. MURPHY: Yes.

15 WITNESS: I dispute that. 12:31

16 CHAIRMAN: Let's get it out in the open. Hold on, one  
17 second. Let's get it out in the open. Mr. Murphy says  
18 this is either an unusual or possibly the only letter  
19 that you penned in longhand to the Minister.

20 WITNESS: I have given that evidence. 12:31

21 CHAIRMAN: Absolutely. Number two, it was an extremely  
22 important letter.

23 WITNESS: Yes.

24 CHAIRMAN: He says it was an extremely urgent letter.  
25 So, the information that you got must have come as very 12:31  
26 important information. In those circumstances,  
27 Mr. Murphy is suggesting -

28 WITNESS: Oh, I have heard --

29 CHAIRMAN: - that it is very hard to understand. Hold

1 on.

2 WITNESS: Yes.

3 CHAIRMAN: He's suggesting, implying that it's very  
4 hard to understand how you wouldn't be able to remember  
5 who gave you this highly important and urgent 12:32  
6 information. That's what he's suggesting.

7 WITNESS: I understand.

8 CHAIRMAN: Maybe it's unimportant, maybe it's  
9 important. That's not where we are at this moment. I  
10 don't want to be suggesting to you that it's important 12:32  
11 or not important. But that's what he is exploring and  
12 I think that is the essence of where we are. He says,  
13 look, it's too much to think that you couldn't remember  
14 that or put it in your diary or whatever it is. That's  
15 what he is saying. What do you say that? 12:32

16 A. I cannot remember. I definitely got the information  
17 from what would have been a good source. His last  
18 question was, he was implying Garda management --

19 327 Q. CHAIRMAN: what he's really saying is: why can't you  
20 remember? That's really where we are going. What 12:32  
21 reason is there for you not to be able to --

22 A. I have no note, I have no note, if I had even a note --

23 328 Q. CHAIRMAN: I have done enough now.

24 A. Yes.

25 329 Q. CHAIRMAN: I am trying as neutrally as I can to layout 12:33  
26 where Mr. Murphy is going.

27 A. Judge, I have gone back here into August as well to see  
28 who I was talking to in relation -- I don't have a note  
29 of anything. I obviously got that information on

1 the -- I'd say that day, on 2/9, I presume.

2 330 Q. CHAIRMAN: Somebody had to tell you.

3 A. Of course.

4 331 Q. CHAIRMAN: Somebody had to tell you, this is going to  
5 the cabinet? 12:33

6 A. Yes, yes.

7 332 Q. CHAIRMAN: Superintendent Murray, his promotion is  
8 going to the cabinet.

9 A. Yes.

10 333 Q. CHAIRMAN: Whenever it is, at their next meeting. 12:33

11 A. Look, if I knew who it was, if I had it in my diary, I  
12 just can't --

13 334 Q. CHAIRMAN: Mr. Murphy is suggesting that you do know  
14 who it was.

15 A. I reject that. 12:34

16 335 Q. CHAIRMAN: That's the writing on the wall?

17 A. I would tell you if I knew who it was.

18 336 Q. CHAIRMAN: I understand.

19 A. I can't turn around and say it might have been Clare  
20 Daly, and it wasn't Clare Daly. And, it might have 12:34  
21 been Mick Wallace, and it wasn't. It was obviously  
22 somebody in my circle.

23 CHAIRMAN: Anything else on that, Mr. Murphy? Whether  
24 it is important or not important or what inferences are  
25 another day's work. Okay. 12:34

26 337 Q. MR. MURPHY: Do you think it's likely, therefore, just  
27 taking your answer, that it was somebody in your circle  
28 who really wanted you to write a letter to the Minister  
29 urgently?

1 A. No. No, I wouldn't -- this would have been -- this  
2 would have been -- the letter is my doing.  
3 338 Q. Then turning down to the letter, please, could I ask  
4 you to look in the middle of the letter, where you say:

12:34

5  
6 "The fact that An Garda Síochána is recommending this  
7 man for promotion is incredible in itself."  
8

9 A. Yes.

10 339 Q. Okay. So there's no doubt about that, Garda Keogh, at  
11 that stage you're targeting Superintendent Murray and  
12 saying he's not a person who is fit it to be promoted.  
13 It's incredible at least, your words?

12:34

14 A. Judge, I already touched on this. This where I am  
15 trying to invoke my complaint against him. And  
16 actually, I think, is it in this one, where I actually  
17 at some stage -- I think attach a lot of documents as  
18 well, some of the documents that we have touched on in  
19 previous matters, where I attach them and I am sending  
20 these letters --

12:35

12:35

21 340 Q. CHAIRMAN: But not to this one, not to this letter?

22 A. I can't remember which letter it was. I do know I sent  
23 documents to Ms. Fitzgerald, because I am obviously  
24 aware of what happened to Minister Shatter when he was  
25 being lied to by Garda management and I would have very  
26 serious suspicions that Ms. Fitzgerald was being  
27 misled. And actually, in that last paragraph here:

12:35

28  
29 "I feel obliged to inform you that you may have been

1 misled by the Garda commissioner in relation to  
2 misconduct in Athlone."

3  
4 And I have that in my own handwriting and I sign it. I  
5 can't be any more transparent than that, Judge 12:35

6 341 Q. MR. MURPHY: Perhaps you could be. Who gave you the  
7 information that led you to say that the commissioner  
8 may have misled the Minister?

9 A. That would be my view.

10 342 Q. Or was that possibly somebody in your circle of trust, 12:36  
11 the same person who gave you the information about the  
12 cabinet?

13 A. Sorry, when it comes to circle of trust and the  
14 commissioner at the time, Nóirín O'Sullivan, I think  
15 everyone, along with most of the country, would have 12:36  
16 had a firm view there, Judge.

17 343 Q. I disagree with you, Garda Keogh. Can you just answer  
18 the question if you can. On what basis were you saying  
19 that the commissioner misled the Minister, in  
20 circumstances where, I think you will agree with me, 12:36  
21 you had nothing in your possession at that time such  
22 as --

23 A. The question is misleading there. Judge, what I have,  
24 "...to inform you that you may have been misled."

25 12:36

26 CHAIRMAN: I agree.

27 344 Q. MR. MURPHY: Would you agree with me, though, this  
28 letter is clearly an attempt to target Superintendent  
29 Murray, to stop him from being promoted?

1 A. It's not targeting. This is where -- there's an issue  
2 here. There's someone going for promotion who I  
3 believe has a -- I believe I have a case and  
4 Superintendent Murray has questions to answer, that it  
5 has to be investigated, and then go on and do 12:37  
6 promotions.

7 345 Q. Moving on to the 10th October, Garda Keogh, can I ask  
8 you to go back, please, to page 2066, volume 8.  
9 Superintendent Murray will say that on the 10th October  
10 2016, that Garda Greene called to his office and 12:37  
11 informed him that he had been approached by you and by  
12 other whistleblowers to go with him and that he had  
13 been asked would he go with them and you to speak to  
14 John McGuinness TD but he had declined. Do you recall  
15 that? 12:38

16 A. I am just trying to find where --

17 346 Q. 2066, at the top of the page, the third line.  
18 CHAIRMAN: The paragraph "on the 10th October".

19 A. Yes, okay.

20 347 Q. MR. MURPHY: Do you recall approaching Garda Greene and 12:38  
21 suggesting that he might go with you to speak to John  
22 McGuinness TD, with other whistleblowers?

23 A. I just want to read this for a moment, please. Judge,  
24 I don't think this is accurate. This note can't be  
25 accurate, because I didn't at any stage have any 12:38  
26 dealings with John McGuinness, Judge. So any dealings,  
27 as in, over the phone or arranging meetings, anything  
28 at all. So I don't think this is accurate, this part  
29 is accurate at all.

1 348 Q. Did you suggest to Garda Greene that he might join  
2 forces with you and other whistleblowers?  
3 A. Well, Judge, at this period of time --  
4 349 Q. 10th October 2016?  
5 A. Garda Greene and I, Judge there's issues there, and we 12:39  
6 have different views in relation to Superintendent  
7 Murray. So I question this whole paragraph.  
8 CHAIRMAN: Okay. So you don't remember this.  
9 A. No, I don't agree with it, Judge.  
10 CHAIRMAN: Okay. 12:39  
11 350 Q. MR. MURPHY: Sorry, just be clear, is it you don't  
12 remember it or it didn't happen?  
13 351 Q. CHAIRMAN: He doesn't agree with it; isn't that right?  
14 The question is this: Garda Greene said that you had  
15 asked him to join you and other whistleblowers in 12:39  
16 approaching Deputy McGuinness. You say, no, that  
17 didn't happen?  
18 A. Judge, firstly, firstly for clarification, just, are  
19 these Superintendent Murray's notes?  
20 352 Q. MR. MURPHY: Yes. 12:39  
21 A. Right.  
22 353 Q. Sorry, this is his statement?  
23 A. Okay. Well, but they're based on his notes,  
24 Superintendent Murray's notes?  
25 354 Q. He's recording what Garda Greene said to him. 12:40  
26 A. That's fine, okay. I see what's written here. I may  
27 have mentioned, I'm only surmising here, that perhaps  
28 there was an offer from John McGuinness or someone who  
29 was talking to John McGuinness may have said, listen --



1 I mean, I am only trying to put this together. And I  
2 may have mentioned something like that to Garda Greene.  
3 But other than that, that's... I can't go any further  
4 with this.

5 355 Q. Moving on then, please, to 25th October 2016. Can I 12:40  
6 ask you to be shown volume 4, please, at page 703?  
7 This is Inspector Minnock's statement. Inspector  
8 Minnock will say on 25th October 2016 he called to see  
9 you. Do you remember that meeting?

10 A. Where in this? 12:41

11 356 Q. Top of page 703, first sentence, first line.

12 A. Okay.

13 357 Q. Do you recall on the 25th October that he called to  
14 visit you?

15 A. I accept. Like, I don't recall just off the top of my 12:41  
16 head. I am accepting it.

17 358 Q. To help you, he will say that he wanted to notify you  
18 that he received notification about you going on half  
19 pay?

20 A. Right. 12:41

21 359 Q. You also had a certificate award from the Irish Water  
22 Safety group?

23 A. Right.

24 360 Q. I think he explained to you about the invitation to  
25 attend the presentation at Dublin Castle? 12:41

26 A. Yes.

27 361 Q. We heard about it in one of the earlier issues?

28 A. Yes.

29 362 Q. He asked you if you would attend the ceremony?

1 A. Yes. So far everything, I am in agreement.

2 363 Q. I think you said you weren't sure if you would attend  
3 and he asked you how you were doing. You said that you  
4 were doing well, that you were still not drinking?

5 A. I was still? 12:42

6 364 Q. CHAIRMAN: You were still off the drink or whatever it  
7 is. You were still not drinking.

8 A. Right.

9 365 Q. MR. MURPHY: was that correct at that time?

10 A. Just what period is this? 12:42

11 366 Q. The 25th October?

12 A. Yes, this is correct. Yes, yeah, yeah. That's  
13 absolutely correct, yes.

14 367 Q. I mean, by this stage, just to assist, had you done the  
15 course in relation to -- 12:42

16 A. Yes.

17 368 Q. That would have helped you. So I think that he will  
18 say that he asked you if you were still engaging with  
19 welfare officers and you said you were, and that you  
20 were just off the phone to Mick Quinn, do you remember 12:42  
21 that right?

22 A. Right.

23 369 Q. Then he will say that you referred to the Garda  
24 Commissioner and you said:  
25 12:42  
26 "She will be gone by Christmas".  
27

28 A. Okay.

29 370 Q. Can I ask you in that regard, had somebody told you in

1 your circle of trust that the Commissioner would be  
2 gone by Christmas?

3 A. Oh I don't know. Was she gone by Christmas? I don't  
4 know if that was even accurate, I don't know.

5 371 Q. If we can move then back, please, to the statement of 12:43  
6 Superintendent Murray, page 2066, volume 8. Again,  
7 Superintendent Murray will say that on 2nd November  
8 2016, he received a registered letter from PIAB,  
9 indicating that you had been authorised to bring civil  
10 proceedings by the board. That's a document which has 12:43  
11 been exhibited. He refers to it as PM92. I think it's  
12 not an issue that -- I think ultimately by that stage  
13 you had issued personal injuries proceedings, isn't  
14 that right?

15 A. Yes, Judge. Just, I am after noticing something here, 12:44  
16 Judge.

17 372 Q. CHAIRMAN: Yes.

18 A. In relation to 25th October 2016, in Inspector  
19 Minnock's statement he says, as we just touched on  
20 there: 12:44

21  
22 "Referred to the Garda Commissioner and that she'd be  
23 gone by Christmas."

24  
25 okay? Full stop. Then Superintendent Murray has in 12:44  
26 his statement, on a note:

27  
28 "On 25th October 2016, Inspector Minnock reported to me  
29 that he found Garda Keogh in poor living conditions

1 while carrying out a welfare visit and that Garda Keogh  
2 informed him that he was going to bring down the  
3 Commissioner by December/January '16."  
4

5 CHAIRMAN: Or January, yes. 12:44

6 A. Yeah, but there's a big difference between she'll be  
7 gone by and he's going to bring down.

8 CHAIRMAN: Yes, I am aware of that.

9 373 Q. MR. MURPHY: Let's take the best evidence then, we'll  
10 take Superintendent's inspector Minnock's evidence 12:45  
11 because he was talking to you. He will say that what  
12 you said was that the Garda Commissioner will be gone  
13 by Christmas?

14 A. Are you implying that Superintendent Murray's evidence  
15 is not -- 12:45

16 374 Q. No, I'm saying it's secondhand, he is recording what  
17 was said to him. I am saying to you that the best  
18 evidence --

19 CHAIRMAN: But you were drawing a difference, a  
20 distinction between the two and it's clear there is a 12:45  
21 difference between the two.

22 A. Judge, as I have said in relation it, a lot of  
23 Superintendent Murray's notes, they're twisted and  
24 there's things that aren't true and there's falsehoods.  
25 Some parts are true. That just was the issue there. 12:45

26 375 Q. MR. MURPHY: To assist on this issue, very briefly  
27 could I ask you to be shown page 2562, please, volume  
28 9. Here is a note that was taken by -- Superintendent  
29 Murray will say that in his record what he was told by

1 Inspector Minnock was that on his visit to your home,  
2 he said that you were sober, the house was very dirty  
3 and that you had said you were going to bring down the  
4 Commissioner and he records:

5  
6 "She will be gone by December or January '17 latest.  
7 Said they had more stuff. And he was restored to full  
8 pay."  
9

12:46

10 A. Are you trying to back up my case? Because I am only  
11 after saying a minute ago -- I'm only after saying what  
12 he said a minute ago. whose note this? This is  
13 Superintendent Murray's note. We've just referred to  
14 Inspector Minnock's statement and this stuff is not in  
15 Inspector Minnock's statement.

12:46

16 376 Q. Garda Keogh, you know Christmas falls every year in  
17 December. There isn't any material difference between  
18 them?

19 A. There is. Because it has "she'll be gone by" to "he  
20 said he was going to bring down", there's a big  
21 difference.

12:47

22 377 Q. You've already told us that you were going to try and  
23 bring her down, that was your objective months ago.

24 A. It's you that brought up and using these examples.

25 378 Q. why are you objecting to the fact that that was your  
26 objective, you said it was your objective?

12:47

27 A. You're questioning me on documents and when I am  
28 pointing out that there is discrepancies in those  
29 documents --

1 379 Q. I'm suggesting to you they are in the material  
2 discrepancies at all. That's a matter for the Chair.  
3 what I am saying to you is, Inspector Minnock will say  
4 that you referred to the Garda Commissioner and said  
5 she'd be gone by Christmas. Do you accept that that's 12:47  
6 what you said?  
7 A. I have no doubt I said that.  
8 380 Q. Moving on please. Can I ask you to go back to  
9 Superintendent Murray's statement at page 2066?  
10 A. Sorry, volume? 12:48  
11 381 Q. That's at volume 8. Superintendent Murray will say  
12 that on 8th November 2016, he received a call from  
13 chief Superintendent Matt Nyland, indicating that you  
14 had been phoning Mr. Croke of GSOC while drunk at  
15 nighttime and making allegations against Garda A. Is 12:48  
16 that true?  
17 A. No, that's --  
18 MR. KELLY: Sorry, that's actually not what is written  
19 there.  
20 CHAIRMAN: No. 12:48  
21 MR. KELLY: If Mr. Murphy would care to read what is  
22 actually written there.  
23 MR. MURPHY: what is contained there is a record that  
24 he received a call from Chief Superintendent Matt  
25 Nyland indicating that you were phoning Mr. Croke of 12:48  
26 GSOC while drunk at nighttime, making an allegation  
27 against Garda A.  
28 CHAIRMAN: Alleging that Garda A was going to kill you.  
29 MR. MURPHY: Yes.

1 CHAIRMAN: That's specifically what you had written  
2 down.

3 WITNESS: I don't think that was the first question  
4 though.

5 CHAIRMAN: Don't mind was that the first question. 12:49

6 382 Q. MR. MURPHY: were you making an allegation against  
7 Garda A? Yes or no?

8 A. Judge, yes. Hang on, I will try to think. At that  
9 period of time, Judge, I had Ms. B, who had what  
10 appeared to be a male person in the car drive by my 12:49  
11 house in October 2015, Judge. I had my own security  
12 issues there, which I can tell you, I got not a lot of  
13 help from Garda management in relation to that.

14 383 Q. Sorry, could I just ask you for one simple fact, did  
15 you phone Mr. Croke of GSOC while you were drunk? 12:49

16 A. I can't remember that, but I accept -- I would accept I  
17 more than likely did. That would be, unfortunately,  
18 the kind of --

19 384 Q. Can I move on, please, to page 2067. On 20th December  
20 2016, Superintendent Murray will say that he was 12:50  
21 informed that neither nor numbers 15 through 18 on the  
22 promotion list would be promoted to chief  
23 superintendent on the present panel, the panel was  
24 being extinguished by the Government and he received  
25 notice of that at that time. So, I think you're aware 12:50  
26 of the fact that the system changed?

27 A. Correct, yeah.

28 385 Q. So, moving to 2017, on 24th January 2017, I think  
29 Deputy Wallace referred to Superintendent Murray in

1           Dáil Éireann.

2           A.    Yeah.  I see that.

3  386   Q.    I think you accept that Mr. Wallace referred in Dáil  
4           Éireann to Superintendent Murray as being a person on  
5           the promotion list who had harassed you? 12:51

6           A.    I would accept that.

7  387   Q.    Can I ask you just to move down again, to page 2067?  
8           On 13th February 2017, Sergeant Haran reported to  
9           Superintendent Murray, in the presence of Inspector  
10          Farrell, that you had phoned him on 12th February 2017, 12:51  
11          do you remember that phone conversation?

12          A.    I don't.

13 388   Q.    He will say that in the course of that conversation  
14          that you said that you were bringing down Commissioner  
15          O'Sullivan and she will be gone by the end of the week 12:51  
16          and that her computer would let her down?

17          A.    Right.

18 389   Q.    Do you recall saying that?

19          A.    With all my attempts to bring down the former  
20          Commissioner, I appear to have failed miserably, Judge. 12:51  
21          I'd accept -- like if Sergeant Haran said that, I mean,  
22          I would accept it.  But I don't -- I just don't  
23          remember that.

24 390   Q.    Again, Chairman, just for ease of reference, could I  
25          ask the Tribunal to note that the reference to Deputy 12:52  
26          Wallace is at page 2596.  I don't think it's necessary  
27          to have it on the screen unless the Chairman requires  
28          it.  But that indicates the details, where in effect:  
29



1 "Mr. Wallace said that the Commissioner was protecting  
2 the chief superintendent, who has been involved in a  
3 heroin case in Athlone. Last year she place the  
4 superintendent on a promotion list. He has been  
5 accused on number occasions of harassing a  
6 whistle blower. "

12:52

7  
8 So, in terms of progression, on the 14th February --

9 CHAIRMAN: Sorry, do you want to say something?

10 A. Oh, I was just going to say I'd agree that that  
11 statement was accurate.

12:52

12 391 Q. MR. MURPHY: So, you're aware of the fact that Deputy  
13 Wallace has begun again to make reference to  
14 Superintendent Murray in the Dáil. Could I move  
15 forward to 14th February of 2017. Superintendent  
16 Murray will say that at 5:40 in the afternoon, while  
17 listening to the Life Five programme on RTÉ, he heard  
18 Deputy Wallace ask the question in Dáil Éireann as to  
19 why the superintendent who bullied you was on placed on  
20 a promotion list to chief superintendent. He will say  
21 that there was further media coverage of Mr. Wallace's  
22 Dáil utterances in the Irish mail on the 15th February.

12:53

23 A. I see that.

24 392 Q. Can I ask you to be shown -- we will move forward then,  
25 please, to 30th March 2017. He will say that Deputy  
26 Wallace questioned the Garda Commissioner during a  
27 meeting of the Dáil Justice Committee about  
28 Superintendent Murrays's appointment, to enquire into  
29 aspects of the controversy relating to penalty points.

12:53

1 Do you recall that?

2 A. I don't recall it, but I would accept that, I don't see  
3 an issue there.

4 393 Q. Could I ask you, please, to be shown volume 9, at page  
5 2612? Do you see this is an extract from the 12:54  
6 journal.ie. There is a headline which says:  
7  
8 "The appointment of Superintendent Pat Murray."  
9

10 Do you see that? 12:55

11 A. Yeah. It doesn't appear to be the -- is this the  
12 same --

13 394 Q. Yes.

14 A. The headline is:  
15 12:55  
16 "Confusion over last minute change."  
17

18 And then the subheading appears to be the appointment  
19 of --

20 395 Q. I'm talking about page 2612, the heading on that page 12:55  
21 is:  
22  
23 "The appointment of Superintendent Pat Murray."  
24

25 Do you agree? 12:55

26 A. It's not a heading, it's a subheading.

27 396 Q. It's a heading on that page?

28 A. On that page.

29 397 Q. Yes, thank you?

1 A. The heading would be the previous page, for  
2 clarification.

3 398 Q. In terms of the report, can I ask you to turn over to  
4 the following page, I think you will agree with me that  
5 Superintendent Murray is named? 12:55

6 A. Yes.

7 399 Q. If you turn over to the following page, he is also  
8 named again, do you see that?

9 A. Yeah.

10 400 Q. In the middle of the page. 12:56

11

12 "Deputy Wallace rephrased the query. I just read the  
13 press report that Superintendent Pat Murray was  
14 actually involved in it but I don't know whether it is  
15 true or not." 12:56

16

17 Were you aware that these questions were going to be  
18 asked about Superintendent Murray on that date?

19 A. I don't know if I would've been aware. As I said, any  
20 dealings I had with Deputies Wallace and Daly is, I sit 12:56  
21 down, I do the talking, they would listen and at  
22 different times they would ask me questions about  
23 whatever and that's it. After that, they deal with  
24 whatever -- they don't -- they're the type of people to  
25 say, if you said, I want you to bring that up or 12:56  
26 something, you can forget it, because they're going to  
27 do their own thing anyway. They are very much their  
28 own individuals.

29 401 Q. Did you brief them in advance of that meeting, saying

1 things against Superintendent Murray?

2 A. Sorry?

3 402 Q. Did you brief them in advance of that meeting to say  
4 things against Superintendent Murray?

5 A. I am sure I would have briefed -- it wouldn't have been 12:57  
6 that I would have looked -- the way it probably would  
7 have worked is, I would have received a call and it  
8 would have been, come up to Dublin. I would have then  
9 had a meeting with them. I've described the way all  
10 the meetings were with them. That's it. 12:57

11 403 Q. So is it fair to say at this time that you met with the  
12 deputies regularly to discuss Superintendent Murray?

13 A. Superintendent Murray and other -- there's all the  
14 other stuff that's going on in the background.

15 404 Q. Let's just focus on Superintendent Murray? 12:57

16 A. But it's not just --

17 405 Q. Let's just focus on this issue, please. This is issue  
18 we're are dealing with, Superintendent Murray. All I'm  
19 asking you is: Did you meet with them regularly to  
20 discuss Superintendent Murray? 12:57

21 A. Among other issues, which were all interrelated and  
22 emanate from criminality and corruption in Athlone.

23 406 Q. If I can ask you to go back, please, to volume 8, page  
24 2068. This is March of 2017. I think you're aware --  
25 this perhaps can be dealt with relatively briefly. I 12:58  
26 think you're aware of the fact now that in March 2017  
27 Superintendent Murray submitted an application for  
28 promotion to the rank of chief superintendent to the  
29 Policing Authority?

1 A. I'm aware now, yeah.

2 407 Q. Yes. And you're aware that the Policing Authority  
3 effectively step into this new role at that time?

4 A. Yes.

5 408 Q. In terms of the first round, he will say that he was 12:58  
6 interviewed for the first time on 5th May 2017. He was  
7 then informed on 19th May 2017 that he was selected to  
8 progress to the final interview stage of the promotion  
9 competition?

10 A. Yes. 12:58

11 409 Q. Then again on 13th June 2017, he will say that he was  
12 informed by the Policing Authority, and this is page  
13 2069, the last paragraph, that he was successful in the  
14 competition for promotion to the rank of chief  
15 superintendent and was placed at number 7, in the order 12:59  
16 of merit for list of candidates deemed suitable for  
17 promotion?

18 A. Okay.

19 410 Q. You also say that named list of candidates appeared in  
20 the media on 7th July 2017. Did you become aware of 12:59  
21 that fact at that date?

22 A. I don't know when I became aware of it.

23 411 Q. Was it shortly thereafter?

24 A. More than likely, more than likely I would have become  
25 aware at some stage. 12:59

26 412 Q. Now, in terms of the position as the summer of 2017  
27 progressed, I think in September of 2017,  
28 Superintendent Murray will say, this is at page 2070,  
29 that Garda Greene spoke to him in the presence of then

1 Inspector Minnock and that he said that you, Garda  
2 Keogh, were no longer going after Superintendent Murray  
3 because your searches for information to unearth  
4 scandal about Superintendent Murray had proved  
5 fruitless. Is that something you said to Garda Greene 13:00  
6 in that time?

7 A. I doubt I would have said that because I fairly -- I  
8 submitted a lot of evidence before this Tribunal,  
9 Judge. So I doubt, I doubt that's accurate.

10 413 Q. He will say that Garda Green indicated that you were 13:00  
11 now going after former Commissioner Ó Cualáin. Is that  
12 what you would have told Garda Greene?

13 A. I can't recollect.

14 414 Q. Is that possible?

15 A. I can't recollect what way I would have worded things 13:00  
16 to Garda Greene and what way Garda Greene then would  
17 have worded them to Superintendent Murray. Then the  
18 issue of what Superintendent Murray himself wrote down.  
19 So, on this, the wording in any of this thing, Judge,  
20 there is a question mark over it. 13:00

21 415 Q. Would that have reflected your state of mind in  
22 September of 2017?

23 A. It may have, I would say, Judge, because I would have  
24 always believed that it was Ó Cualáin, Deputy  
25 Commissioner Ó Cualáin that put Superintendent Murray 13:01  
26 into the role to get me out. That's always been my  
27 case. I have always maintained that.

28 CHAIRMAN: Okay.

29 416 Q. MR. MURPHY: Except, as I put to you before, that's a

1 case with no evidence.

2 CHAIRMAN: But that's what he says, I have always  
3 believed that. All right.

4 WITNESS: Judge, just to address the last page, Judge.

5 CHAIRMAN: Yes. 13:01

6 WITNESS: Can we bring document 11345, Judge.

7 CHAIRMAN: Certainly. Yes. 11345. Okay. Now, what's  
8 this?

9 WITNESS: Judge, this is on Thursday, 14th September  
10 2017. It's a note from Donal Ó Cualáin. 13:01

11 417 Q. CHAIRMAN: Thursday, the 14th September?

12 A. Yes.

13

14 "Rang P Murray. Discussed college option with him.  
15 Was happy to take it on promotion." 13:02

16

17 418 Q. CHAIRMAN: Yes.

18 A. They're already lining Superintendent Murray and Deputy  
19 Commissioner Ó Cualáin, they're all ready, and this is  
20 prior to the promotion in the Policing Authority. 13:02

21 Judge, if we go to the next page, there is a further  
22 part.

23 419 Q. CHAIRMAN: Yes.

24 A. It's on Thursday, 19th October 2017.

25 420 Q. CHAIRMAN: Hold on a second until we get there. Just 13:02  
26 give us a chance to get there. Yes.

27 A. Yes. This is Donal Ó Cualáin:

28

29 "Rang Eugene Corcoran."

1

2 He's another assistant commissioner, I think he's now  
3 maybe retired.

4 421 Q. CHAIRMAN: Yes.

5 A.

13:02

6 "... to call to office. Also discussed NK file.  
7 Clearance for P Murray."

8

9 Judge, this is prior, this is all going on prior to the  
10 Policing Authority promotion.

13:02

11 422 Q. MR. MURPHY: Did you know that in September 2017?

12 A. No, I am only --

13 423 Q. Or October 2017?

14 A. I am only after finding out sure all this from reading  
15 the documents.

13:03

16 424 Q. We will come back to this later on. We are talking  
17 about your state of mind in September 2017, where it's  
18 recorded that you were saying that you were now going  
19 after former Commissioner Ó Cualáin. At that stage you  
20 know nothing about the internal disposition of forward  
21 planning, or did you?

13:03

22 A. No, I didn't know anything about it.

23 425 Q. No.

24 A. I didn't know internally what was going on. But the  
25 point is, they're already, they're already lining up  
26 the promotion. My point was originally -- I know I  
27 have said it again.

13:03

28 426 Q. CHAIRMAN: Yes.

29 A. But just to reinforce it, that Ó Cualáin put Murray --



1 Deputy Commissioner Ó Cualáin put Superintendent Murray  
2 in Athlone to get me out so he could conduct the  
3 investigation or whatever he was doing. And after that  
4 then they organised the promotion, which is clearly  
5 there on 11345, where Ó Cualáin is discussing with 13:03  
6 this. And I mean --

7 427 Q. CHAIRMAN: Tell me more. What conclusion are you  
8 drawing from the materials that we're looking at?  
9 A. My conclusion is, what I had stated all along, my  
10 suspicion. 13:04

11 428 Q. CHAIRMAN: Turns out to be right.  
12 A. Correct.

13 429 Q. CHAIRMAN: Explain how it turned out to be right.  
14 A. Well, it's in these documents here and then there is  
15 more -- 13:04

16 430 Q. CHAIRMAN: No, these documents here, what do you read  
17 these documents as saying that confirms your  
18 suspicions, that is what I want to know?  
19 A. Yes. In relation to 345, Judge, there, Deputy  
20 Commissioner Ó Cualáin is in contact, direct contact 13:04  
21 with Superintendent Pat Murray, discussing where he is  
22 going to be stationed after he is promoted.

23 431 Q. CHAIRMAN: Yes? And?  
24 A. Well, he hasn't even been promoted yet and they're  
25 discussing where he is going to be put after the 13:04  
26 promotion. Because there's an issue with filling out  
27 the clearance forms.

28 432 Q. CHAIRMAN: Okay.  
29 A. Which involved Deputy Commissioner Ó Cualáin and

1 Assistant Commissioner Finn, Judge.

2 433 Q. CHAIRMAN: whether it's right or it's not right or it's  
3 important or it's not important, you are citing these  
4 documents as evidence to support your contention of  
5 irregular conduct on the part of Assistant Commissioner 13:05  
6 Ó Cualáin?

7 A. Yes, Judge.

8 434 Q. CHAIRMAN: Is that right?

9 A. Yes.

10 435 Q. MR. MURPHY: Sorry, Garda Keogh, there is just one 13:05  
11 problem about that, which you dealt with, which you  
12 have ignored, that's at page 2069. That's on 30th June  
13 2017, the Policing Authority, an independent body, had  
14 told Superintendent Murray he was successful in the  
15 competition for promotion to chief superintendent and 13:05  
16 was placed in an order of rank. In other words, his  
17 promotion in that situation will occur in the course of  
18 time?

19 CHAIRMAN: On the 30th June.

20 MR. MURPHY: On the 30th. 13:06

21 CHAIRMAN: No, no, I had it as the 13th, I had  
22 miswritten it.

23 436 Q. MR. MURPHY: I have to suggest to you there's nothing  
24 weird or wonderful about that discussion at all.

25 WITNESS: Judge, can I address that, and I know we're 13:06  
26 due to break. Page 4023, please.

27 CHAIRMAN: Yes. Can we get 4023? what about this?

28 WITNESS: This is, Judge, September 2017, these are the  
29 clearance forms in relation to Superintendent Murray's

1 promotion. Judge, Assistant Commissioner Finn, I think  
2 now just on this, is investigating the bullying and  
3 harassment thing, Judge. At the bottom of page 4023,  
4 this is Assistant Commissioner Finn's clearance form  
5 for Superintendent Murray.

13:07

6  
7 "Records at this office indicate there are presently no  
8 outstanding discipline or complaint investigation in  
9 respect of this candidate."

10 13:07

11 437 Q. CHAIRMAN: Yes. And the date of that is?

12 A. It looks like 16/9/17, it looks like.

13 438 Q. CHAIRMAN: we will get the date of that. Hold on, we  
14 will get the date of that document.

15 A. Judge, just on the next document, at 4024, Judge,  
16 section 5:

13:07

17  
18 "I confirm that the information provided in section 1  
19 to 4 is complete and I will notify the Policing  
20 Authority without delay of any change or update of that  
21 information until the panel candidates arising from  
22 this section competition expires and if requested..."

13:08

23  
24 Judge, they lied to the Policing Authority in relation  
25 to this matter, between Assistant Commissioner Finn and  
26 Assistant Commissioner Ó Cualáin and they're already --  
27 Assistant Commissioner Ó Cualáin is previously speaking  
28 to Murray in relation to where he wants to go when he's  
29 promoted.

13:08

1 439 Q. MR. MURPHY: Again, Garda Keogh, I suggest that's  
2 entirely false. What agreement and what investigation  
3 was in place at that date?  
4 A. There's a bullying and harassment investigation.  
5 440 Q. On which date? 13:08  
6 A. These documents are written in, when, September '17.  
7 441 Q. Had anybody been appointed to investigate at that  
8 stage?  
9 A. Judge, the thing with -- I'm not sure on the  
10 appointment. But what it has here: 13:09  
11  
12 "I will notify the Policing Authority without delay of  
13 any change or update."  
14  
15 They never told or updated the Policing Authority with 13:09  
16 anything. That's as good as a lie. They kept them in  
17 the dark  
18 442 Q. CHAIRMAN: Okay. That's on page 40?  
19 A. 24.  
20 443 Q. MR. MURPHY: Notwithstanding the fact, Garda Keogh, as 13:09  
21 we dealt with in recent days, you know full well that  
22 the appointment in relation to bullying and harassment  
23 was November 2017, is that right?  
24 A. Sorry?  
25 444 Q. The appointment in relation to the bullying and 13:09  
26 harassment case, inquiry, was 2017, November, isn't  
27 that right?  
28 A. And was Assistant Commissioner Finn appointed to do it.  
29 MR. KELLY: Judge, in fairness, I should point out that

1 this witness has said that the complaint was actually  
2 made in March.

3 CHAIRMAN: Yes.

4 MR. KELLY: It may well be that there was a delay in  
5 the process, that's part of our case, that there was a 13:09  
6 delay in appointment.

7 CHAIRMAN: Okay.

8 MR. MURPHY: And there was also an acceptance by this  
9 witness in relation to the Finn inquiry, that he  
10 accepted the explanation given by Assistant 13:10  
11 Commissioner Fanning.

12 CHAIRMAN: well, there we will leave it. Thank you  
13 very much. We will come back a little after, whatever  
14 time is it now, we will come back at 2:15. Okay.  
15 Thank you very much. 13:10

16

17 THE HEARING THEN ADJOURNED FOR LUNCH AND RESUMED, AS  
18 FOLLOWS:

19

20 445 Q. MR. MURPHY: Thank you, Chairman. Garda Keogh, I think 14:13  
21 just before lunch you made reference to some  
22 documentation in relation to the Policing Authority. I  
23 wonder if you could be shown volume 14, page 4021,  
24 please. I think this is the document entitled:  
25 14:14

26 "Policing Authority clearance form - to be completed by  
27 the Garda Síochána".  
28  
29 Do you see this?

1 A. Yes.

2 446 Q. Can I just ask you to turn to the second -- sorry, the  
3 middle of the page, it says:  
4  
5 "Clearance process required of the authority." 14:14  
6  
7 And it says:  
8  
9 "The authority's clearance process is based on this  
10 form, a form completed by the candidate and a form 14:15  
11 completed by the GSOC Commission. The clearance  
12 process will be activated in the event that candidate  
13 is placed on the panel of candidates and has been  
14 considered for appointment to a position and the  
15 selection Board will decide on any clearance process 14:15  
16 forms."  
17  
18 Just turning over to the next page, please?  
19 A. Sorry, just what page are we on now?  
20 447 Q. That's page 4022. 14:15  
21 A. Okay.  
22 448 Q. Which is the next page. Can I just draw your attention  
23 to the middle of the page, under the heading  
24 "Section 2". This is the format that applied at that  
25 time, it has been I think subsequently amended. I 14:15  
26 think you are familiar with this. Under section 2, it  
27 says:  
28  
29 "Previous disciplinary actions: Please provide details

1 of any disciplinary actions under the Garda Síochána  
2 (Discipline) Regulations that the candidate was the  
3 subject of."

4

5 Do you see that?

14:15

6 A. That's what it says.

7 449 Q. And what it says and what it says at the time was, this  
8 should include:

9

10 "1. The nature of the breach of discipline in respect 14:16  
11 of which the candidate was sanctioned.

12

13 2. The nature of the sanction.

14

15 3. The date of the sanction.

14:16

16

17 4. Any other relevant matters you may wish to bring to  
18 the authority's attention."

19

20 A. Sorry, what was the last one there?

14:16

21 450 Q. Garda Keogh, can you see the page?

22 A. Any other --

23 451 Q. Yes. Can you just look at the paragraph I am looking  
24 at, which I am reading out to you and just focus on the  
25 page, if you will, please. So, this indicates what's 14:16  
26 required to be included. Do you see all those details?

27 A. Yes.

28 452 Q. Now, the first point, would you agree with me that the  
29 heading there is "previous disciplinary actions"?

1 A. Yes. But obviously the last part jumped out:  
2  
3 "Any other relevant matters you wish to bring to the  
4 authority's attention."  
5 14:16

6 453 Q. Yes, and that is under the heading of "disciplinary  
7 action", isn't that right?

8 A. Yes.

9 454 Q. You agree with me that that does not refer to bullying  
10 or harassment, it refers to disciplinary issues, isn't 14:16  
11 that correct. That's the word at the top of the form?

12 A. Well, you see, it's a possibility that there could very  
13 well be disciplinary matters out of a bullying and  
14 harassment investigation.

15 455 Q. Garda Keogh, don't you know full well there's a 14:17  
16 difference between disciplinary investigations and  
17 bullying and harassment investigations. The point I'm  
18 putting to you, which you understand fully I suggest,  
19 is that at that time what was required to be inserted  
20 was matters relating to disciplinary actions, full 14:17  
21 stop?

22 A. It has here, in this is:  
23  
24 "Any other relevant matters that you wish to bring to  
25 the authority's attention". 14:17  
26

27 456 Q. Again, that's all relating, as it suggests there, to  
28 disciplinary issues. I will put it to you again, just  
29 to assist you in that regard, this has been changed, on



1 my instructions, since that time and now does  
2 incorporate a separate reference to bullying and  
3 harassment. So, at the time that we are talking about  
4 relevant to this case, that the only material that was  
5 to be put in was disciplinary. Would you agree with 14:17  
6 that?

7 A. Well, Judge, on section 4 here, on the next page, it  
8 has --

9 CHAIRMAN: He is asking about paragraph 2.

10 WITNESS: Yes. 14:18

11 CHAIRMAN: He's not asking you to argue or jump ahead  
12 or anything else. Let's just focus on the questions.

13 457 Q. MR. MURPHY: So, looking at section 2, I have asked you  
14 to agree with me that that's disciplinary, and I think  
15 you accept that? 14:18

16 A. Yes.

17 458 Q. I've asked you to agree that that doesn't represent  
18 bullying and harassment, which as you know under the  
19 Garda Code at that time was a separate process?

20 A. But again, my answer is, it's possible there could be 14:18  
21 disciplinary matters out of a bullying and harassment  
22 investigation.

23 459 Q. The point I'm making to you, Garda Keogh, which I think  
24 you understood, is that at the time the forms were  
25 filled in that's relevant to this issue, what was 14:18  
26 required to be inserted was disciplinary actions, isn't  
27 that right?

28 A. That's the heading it's under.

29 460 Q. If we just turn over the page, please, to the page you

1 were going to move to, page 4023, section 3 deals with  
2 previous convictions. I think you will agree with me,  
3 that relates to criminal items, including road traffic  
4 items?

5 A. Yes. 14:18

6 461 Q. That's very specific. Then section 4, that's headed

7

8 "Outstanding criminal or disciplinary investigations."

9

10 Do you see that? 14:19

11 A. Yes.

12 462 Q. Do you see also the bullet-points, it says:

13

14 "This should include the nature of the alleged  
15 wrongdoing; the nature of the investigative process;  
16 criminal or discipline; less serious discipline or  
17 serious discipline; and details of the stage of the  
18 investigation or process." 14:19

19

20 A. Yes, Judge. 14:19

21 463 Q. So, I have to suggest to you that at that time the  
22 documentation required information in those categories  
23 and those categories only to be referred to in the  
24 form?

25 A. Oh, I don't -- Judge, I can't -- this -- Judge, they  
26 were obliged to inform the Policing Authority that  
27 there was a bullying and harassment investigation. 14:19

28 464 Q. I have to suggest to you that the Policing Authority's  
29 own rules did not require that at the time. And that's

1 the point about the form, isn't it? The form doesn't  
2 mention bullying and harassment at all, isn't that  
3 correct?

4 A. I'd have to read the full form, but Mr. Murphy may be  
5 correct on that, Judge. 14:20

6 465 Q. Garda Keogh, there are two things here, you may  
7 disagree with the this form, you may disagree with the  
8 completeness of what was required by the authority, but  
9 I am just asking you to accept as a matter of fact, at  
10 that time this was the form the Policing Authority 14:20  
11 required to be filled in?

12 A. Judge, I have to accept that, but in accepting it, I  
13 have to point out the thing on page 4022, which does  
14 say:

15 14:20  
16 "Any other relevant matters you wish to bring to the  
17 authority's attention."

18  
19 I think that sentence, Judge, covers my argument.

20 466 Q. You see, I have to suggest to you that that covers 14:20  
21 issues in relation to disciplinary action?

22 CHAIRMAN: Mr. Murphy, are we slightly at -- Garda  
23 Keogh says, look, I wrote to the various people,  
24 including the Policing Authority, and I said, here's  
25 serious complaints against Superintendent Murray and 14:21  
26 you shouldn't promote him until they have been disposed  
27 of.

28 MR. MURPHY: Yes.

29 CHAIRMAN: In a nutshell, not exactly that, but in a

1 nutshe'll that was what he was saying. The meaning, the  
2 interpretation of the Policing Authority rules, may I  
3 respectfully suggest, is not to be determined by, with  
4 all respect, Garda Keogh's opinion about it.

5 MR. MURPHY: Yes, Chairman, I accept that. 14:21

6 CHAIRMAN: He points out the inclusion of any other  
7 relevant matters. I will in due course be hoping for  
8 submissions from you and from Mr. Kelly and from our  
9 own counsel as to the proper interpretation to be put  
10 on that. But I think it's a matter of interpretation 14:22  
11 of law. In other words, I don't think that -- Garda  
12 Keogh, you didn't have this at the time..

13 A. No.

14 467 Q. CHAIRMAN: You didn't have this form at the time?

15 A. No. 14:22

16 468 Q. CHAIRMAN: You're just looking at this after. I mean  
17 no disrespect when I say that -- let me put it this  
18 way: Just for the sake of argument, suppose you were  
19 to agree with Mr. Murphy that this had nothing to do  
20 whatsoever with bullying and harassment, and suppose it 14:22  
21 did have a section saying it and you mistakenly agreed,  
22 it's still a matter that for interpretation that has to  
23 be looked at. Do you follow me?

24 A. Yes.

25 469 Q. CHAIRMAN: Really in the end it's a lawyers' debate 14:22  
26 arising out of the facts. I take it would you agree  
27 with that, Mr. Kelly?

28 MR. KELLY: Yes.

29 CHAIRMAN: The interpretation of the form is a

1 matter -- I would be welcoming submissions on that  
2 particular point. Mr. Murphy says, look, we did  
3 absolutely nothing wrong, the Gardaí did nothing wrong,  
4 they sent it forward in accordance with the form at the  
5 time. That's a matter for discussion, it seems to me, 14:23  
6 as to the meaning of the thing.  
7 MR. KELLY: It's a matter for you in the end, Judge, to  
8 decide.  
9 CHAIRMAN: with counsel's assistance.  
10 MR. MURPHY: Yes. 14:23  
11 CHAIRMAN: It's not a rebuke, Mr. Murphy. I am just  
12 thinking, I am just reflecting on the discussion. I  
13 have no criticism for you putting it to Garda Keogh but  
14 I am just thinking through that, no, we will get to  
15 that. 14:23  
16 MR. MURPHY: Chairman, I fully accept your indication  
17 and direction. Merely I felt the need to put it to a  
18 witness because it was so --  
19 CHAIRMAN: No, no, I appreciate that. We have been  
20 dealing very much a question as to what was necessary 14:23  
21 to put. Garda Keogh has said, look, my position is, I  
22 notified them and I believe they shouldn't have moved  
23 without satisfying themselves that this matter was  
24 determined. I think that's essentially your point.  
25 A. Yes. 14:24  
26 CHAIRMAN: Okay.  
27 470 Q. MR. MURPHY: Thank you, Chairman. Could I move on then  
28 please, to volume 8, at page 2070. Superintendent  
29 Murray will say that on 27th September 2017, that RTÉ

1 News at one radio programme made reference to him by  
2 name as a senior officer waiting to be promoted and  
3 against whom you had made allegations. The programme  
4 also queried if the Policing Authority were aware of  
5 that. Can I ask you, did you speak to RTÉ in an effort 14:24  
6 to ensure that that information was made available to  
7 them?

8 A. Em, Judge, can I just read -- this is bottom paragraph  
9 on page --

10 CHAIRMAN: On the 27th September, yes. 14:25

11 A. Judge, this is Clare Daly I think that's speaking to  
12 RTÉ.

13 471 Q. MR. MURPHY: Just to be clear, Garda Keogh, are you  
14 saying to the Chairman that had you nothing to do with  
15 this at all? 14:25

16 A. No, I would agree -- anything that Clare Daly had said  
17 in relation to Athlone or anything to do with me has  
18 come from me.

19 472 Q. Does it come a bit closer than that? Did you instruct  
20 your solicitor to speak to RTÉ about this matter? 14:25

21 A. Judge, I'm aware that my solicitor did speak to, oh, I  
22 think it was the This Week programme on RTÉ.

23 473 Q. Again just to help you, Garda Keogh, and to be fair to  
24 you, could I ask that you be shown --

25 A. Sorry, no, I think. I know, Judge, that. 14:26

26 474 Q. Could you please be shown volume 9, at page 2648?

27 475 Q. CHAIRMAN: Around this time, in other words?

28 A. Yes, Judge.

29 476 Q. MR. MURPHY: First of all, Garda Keogh, you see the

1 headline says:  
2  
3 "Letter claims Garda whistleblower kept in dark over  
4 allegations probe."  
5 14:26  
6 Do you see that?  
7 A. Yes, Judge  
8 477 Q. Can I ask you to look at the second paragraph, it says:  
9  
10 "According to correspondence seen by RTÉ's This Week 14:26  
11 radio programme, Garda Nick Keogh has written to Garda  
12 headquarters saying he is totally in the dark over how  
13 several related programmes into his allegations are now  
14 being handled."  
15 14:27  
16 Do you see that?  
17 A. Yes.  
18 478 Q. I think you will agree with me, that must have been  
19 because you or Mr. Cullen supplied that information to  
20 RTÉ? 14:27  
21 A. Yes, Judge.  
22 479 Q. Thank you. Then over the next page --  
23 A. Just for clarification as well, it's not just one  
24 probe, it's not just the bullying and harassment thing,  
25 there's the disciplinary investigation, of course, as 14:27  
26 well.  
27 CHAIRMAN: Several related probes it says.  
28 A. Yes.  
29 480 Q. MR. MURPHY: Please could you just turn over to the

1 following page, page 2649. Do you see the middle of  
2 the page, please, the sentence beginning:

3  
4 "Speaking to RTÉ This Week, Carrick-on-Shannon based  
5 solicitor John Gerard Cullen, who represents Garda 14:27  
6 Keogh, said his client had no idea what was the current  
7 status of the complaint."

8  
9 A. Yes, Judge.

10 481 Q. You can see there is a quotation, I don't propose to 14:28  
11 read that into the record, but I think effectively  
12 Mr. Cullen protests about delay and says that you have  
13 no reason as to understand why there had been a delay.  
14 Is that correct?

15 A. Yes. 14:28

16 482 Q. Then it says, at the following page, at page 2650, and  
17 it made reference to your complaints, it says:

18  
19 "He says in the letter..."

20  
21 That's you say in the letter. 14:28

22  
23 "...that the bullying complaint relates in part to a  
24 senior officer in the force who has sought promotion  
25 and he has questioned whether the Policing Authority 14:28  
26 would be have been made aware of this complaint."

27  
28 A. Yes.

29 483 Q. Then Mr. Cullen is quoted as saying:



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"Garda Keogh i nvoked a formal procedure about si x months ago and we don't have any idea what has happened since. "

14:29

A. Yes.

484 Q. Again, the balance of the article refers protests by Mr. Cullen on your behalf about delay. So I think there is no doubt about it but that this broadcast was directly, fundamentally and completely informed by what you instructed Mr. Cullen to say towards you?

14:29

A. Judge, I wouldn't have instructed word-for-word what Mr. Cullen is going to say.

485 Q. CHAIRMAN: No, in a general way, Mr. Cullen acting on your behalf is making these observations?

14:29

A. Yes.

486 Q. MR. MURPHY: Could I ask you please to move back then to volume 8, at page 2070. This is in September of 2017. Superintendent Murray will say that on 27th September 2017, Deputy Daly made reference at a Dáil Justice Committee to Superintendent Murray in asking the authority chairman, Ms. Josephine Feehily of the Policing Authority, if she received correspondence from a solicitor about you, and if Garda management were pulling the wool over the authority's eyes in relation to the promotion of Superintendent Murray. Can we take it insofar as there is reference to correspondence from a solicitor, you had furnished that correspondence to Deputy Daly?

14:30

14:30

1 A. I would presume so.

2 487 Q. Yes. In terms of Superintendent Murray's position, at  
3 this stage there has been multiple broadcasts, now an  
4 interview by your solicitor, speeches in the Dáil and  
5 all of this, I have to suggest to you, was a pattern of 14:30  
6 conduct which amounted to targeting Superintendent  
7 Murray to try and block his promotion?

8 A. No, no, no, no. No, Judge. Because there's other  
9 matters. There's the main thing -- there's the  
10 promotion is one issue, fine. But there's also the 14:31  
11 other, the big -- the elephant in the room, the  
12 disciplinary investigation into the heroin and that  
13 side of the thing is also there.

14 488 Q. To put it a different way, I think you agreed earlier  
15 on what you were doing here was seeking to bring 14:31  
16 Superintendent Murray down?

17 A. No, no.

18 489 Q. Well you weren't trying to help him, were you?

19 A. No, no. I have said all along, if they were going to  
20 do the promotion, do it properly. Have the 14:31  
21 investigation and do it properly. That's all.

22 490 Q. Garda Keogh, separately did you not accept this morning  
23 that you had an intention to do what you could to bring  
24 down a number of people, including Superintendent  
25 Murray and you accepted this morning that bringing down 14:31  
26 meant ending their career?

27 A. No, Judge.

28 491 Q. That's what you said this morning?

29 A. Judge, I don't think it's entirely accurate.

1 492 Q. I have to suggest to you it was.  
2 CHAIRMAN: You have raised the question, Mr. Murphy.  
3 If he said it this morning, then he said it this  
4 morning, and if he didn't say it this morning... Now  
5 what do you say? How do you want to respond to that? 14:32  
6 A. I accept there's an awful lot of references to me  
7 saying bring down Nóirín O'Sullivan. But in relation  
8 to Superintendent Murray, it's to do with -- what my  
9 argument all along is, if he was to be promoted it  
10 should have been after the investigation and not 14:32  
11 during.  
12 493 Q. CHAIRMAN: I have that point.  
13 A. Yes.  
14 494 Q. CHAIRMAN: Now, Mr. Murphy says, well, look here,  
15 wasn't this part of a plan? I'm not saying I agree 14:32  
16 with it, I'm just saying what he is saying. Wasn't  
17 this part of your plan, your intention, your scheme,  
18 reflected in your attitude, that you wanted eh wanted  
19 to bring him down? Do you understand?  
20 A. Oh yeah, I understand. 14:33  
21 495 Q. CHAIRMAN: Do you understand what I am saying? I'm not  
22 saying that's your attitude. I am asking you to  
23 comment on the suggestion that that was your attitude?  
24 A. I think bringing down is the wrong phrase. To prevent  
25 him being promoted while the investigation is ongoing. 14:33  
26 496 Q. CHAIRMAN: Let me come back for a second. If it was  
27 your intention, before any question of promotion came  
28 up, if it was your intention to bring him down, if it  
29 was your intention to bring him down, and then this

1 promotion question comes in, okay, that might be an  
2 opportunity for at least damaging him, if not bringing  
3 him down, I'll try to frustrate the promotion, you  
4 know.

5 A. Yeah.

14:33

6 497 Q. CHAIRMAN: Okay. Maybe it's not nice, but maybe that  
7 was your attitude. Is that what we are talking about?

8 A. Yeah, I think that's more accurate than bringing him  
9 down, Judge. I think that's more accurate.

10 498 Q. CHAIRMAN: I really don't want to be -- I'm slightly  
11 reluctant to put any words on this for fear of getting  
12 it wrong or suggesting something wrong. Do you follow  
13 me?

14:33

14 A. Yes, yes. Judge, I was highlighting -- trying to get  
15 Deputy Daly and Deputy Wallace to highlight the fact  
16 that they're aware from the very start in relation to  
17 bullying, the whole chain of events of bullying and  
18 harassment that I -- prior even to Superintendent  
19 Murray. But in relation to Superintendent Murray, that  
20 becomes an issue when he then is going for promotion.

14:34

21 It's parallel at the same time, roughly, I am trying to  
22 invoke the bullying and harassment policy. That's  
23 where we are at here. Both of these things are in --  
24 what's the word? They're both parallel, going forward.  
25 An Garda Síochána is trying to promote, appears to be  
26 trying to promote Superintendent Murray, based on what  
27 it showed earlier. And I'm speaking to Deputies  
28 Wallace and Daly and I'm pointing out to them he  
29 shouldn't be promoted, at least until this dealt with.

14:34

14:35

1 CHAIRMAN: Okay.

2 499 Q. MR. MURPHY: I wonder just in the light of that answer,  
3 can I ask you to be shown volume 9, please, page 2647.  
4 This is a note prepared by Superintendent Murray based  
5 on the conversation you referred to before lunch, on 14:35  
6 4/9/2017, with Garda Greene. You recall that before  
7 lunch we raised this issue with you, that  
8 Superintendent Murray will say that Garda Greene spoke  
9 to him in Athlone Garda Station, then had a  
10 conversation with him outside, in which he told 14:36  
11 Superintendent Murray that you were no longer going  
12 after him because you were of the view that you could  
13 no longer damage Superintendent Murray's promotions any  
14 more because he had been selected for promotion by the  
15 Policing Authority and your searches hadn't unearthed 14:36  
16 anything with which to damage the character of  
17 Superintendent Murray any further?

18 A. Judge, this is Superintendent Murray's version in  
19 writing.

20 500 Q. CHAIRMAN: Of a conversation he had with Garda Greene? 14:36  
21 A. Yes.

22 501 Q. CHAIRMAN: In relation to a conversation that Garda  
23 Greene had with you?

24 A. Correct.

25 502 Q. CHAIRMAN: Okay. All I want to know is, take what 14:36  
26 Garda Greene is reported as saying about you and tell  
27 me what you think: Did you say it? Did you mean it?  
28 Or did you say something different? Can you remember?  
29 Or what is the position?

1 A. Judge, can I just read the paragraph?  
2 CHAIRMAN: Read it, yes.

3 503 Q. MR. MURPHY: Garda Keogh, can I you ask you just to  
4 forget for a moment about Superintendent Murray and  
5 just think about Garda Greene. Did you tell Garda 14:37  
6 Greene in early September 2017 that you were no longer  
7 going after Superintendent Murray because you were of  
8 the view that you couldn't damage Superintendent  
9 Murray's promotion prospects any more?

10 A. Judge, I can't recollect what I would have said to 14:38  
11 Garda Greene. Certainly the wording in this definitely  
12 wouldn't have been -- if there was a conversation along  
13 those lines, definitely I wouldn't worded it as they're  
14 recorded here.

15 504 Q. Leave the words to one side, how about the message, 14:38  
16 would the essential message have been correct; that you  
17 weren't going after Superintendent Murray any more,  
18 that your searches hadn't unearthed anything with which  
19 to damage Superintendent Murray's character any  
20 further, something along those lines? 14:38

21 A. Judge, I don't think that would be accurate, that part.

22 505 Q. Do you see the next bit where --  
23 CHAIRMAN: Just stop there for a minute. You say there  
24 was a conversation along those lines.

25 A. There may have been. 14:38

26 506 Q. CHAIRMAN: Is that right?

27 A. There may have been.

28 507 Q. CHAIRMAN: Sorry, there may have been?

29 A. I just can't remember.

1 CHAIRMAN: No, no, that is okay. You're not agreeing  
2 that there was, you're saying it's possible that there  
3 was. You're not denying the possibility.

4 A. I'm not, no, I'm not denying the possibility.

5 508 Q. CHAIRMAN: Okay. 14:39

6 A. But the wording on this, the way it's worded --

7 509 Q. MR. MURPHY: Let's leave the wording, Garda, to one  
8 side. Just the second message, is it the case that you  
9 gave a message to Garda Greene in early September 2017  
10 that you were now going after Deputy Commissioner 14:39  
11 Ó Cualáin and the Commissioner instead?

12 A. Judge, the words here "going after" and all this sort  
13 of stuff, that's not something that I -- I mean... I  
14 don't know what to say in relation to that.

15 510 Q. CHAIRMAN: Just say what you want to say? 14:39

16 A. Yeah.

17 511 Q. CHAIRMAN: If you don't think you said it. You had  
18 some such conversation?

19 A. Yeah, I'm sure I would have had a --

20 512 Q. CHAIRMAN: But you don't recall saying the things that 14:39  
21 you're reported as saying, but there was some such  
22 conversation?

23 A. There would have been a certain conversation, Judge.  
24 But again, whatever I would have said to Garda Greene  
25 is one matter, and then Garda Greene, whatever way he 14:40  
26 interpreted what I said, goes back to Superintendent  
27 Murray, who then interprets what he said.

28 513 Q. CHAIRMAN: Don't you worry, I am fully alive.

29 A. Yeah.

1 514 Q. CHAIRMAN: I am fully alive to the possibilities of  
2 misunderstanding. I am fully alive to that. But where  
3 we are so far is, yes, there was a conversation  
4 referring to these matters, is that right?  
5 A. I presume. 14:40  
6 515 Q. CHAIRMAN: You think.  
7 A. Can I check my diary, just in case I have --  
8 516 Q. CHAIRMAN: Yes, that would be helpful.  
9 A. Yeah, I have nothing in my diary.  
10 517 Q. CHAIRMAN: Nothing there? 14:40  
11 A. No.  
12 CHAIRMAN: Very good. All right, Mr. Murphy.  
13 518 Q. MR. MURPHY: Garda Keogh, would you agree with me that  
14 recording of that conversation is completely different  
15 to what occurs on 24th September 2017, when your 14:41  
16 solicitor is on national radio or TV effectively again  
17 repeating your complaints against Superintendent  
18 Murray?  
19 A. Judge, I'm confused. Like, a huge part of the evidence  
20 I've given to this Tribunal is in relation to 14:41  
21 Superintendent Murray. I don't fully follow where the  
22 question is going.  
23 519 Q. Can I suggest to you that certainly by the end of  
24 September 2017, your campaign to damage Superintendent  
25 Murray, to prevent his promotion, to bring him down was 14:41  
26 fully underway?  
27 A. Judge --  
28 520 Q. CHAIRMAN: If you said that to Garda Greene and he got  
29 it right, and if the record made by the superintendent



1 a correct reflection, Mr. Murphy says that position as  
2 imputed to you is very different to from the position  
3 by Mr. Cullen on the 24th September. which is correct,  
4 it is very different. Because you're saying in this  
5 one, as reported, I'm not going after him any more, 14:42  
6 because he's already got promoted. whereas on the 24th  
7 you definitely appeared to be going after him.

8 A. Judge, yeah, if that was the case, wouldn't I have  
9 dropped my bullying and harassment thing.

10 521 Q. CHAIRMAN: I don't know whether you would or wouldn't. 14:42  
11 But there is a big difference between -

12 A. Yeah.

13 522 Q. CHAIRMAN: - what is imputed to you there and what  
14 happened. That is what Mr. Murphy is pointing out?

15 A. Judge, I never dropped any of these allegations or 14:42  
16 anything. All along I have stood by them and here to  
17 this Tribunal and that. So I am just confused by the  
18 way this is worded as well.

19 523 Q. CHAIRMAN: I understand.

20 A. All I can accept, Judge, is there would have been a 14:43  
21 conversation, I'm sure there is a conversation between  
22 myself and Garda Greene. The way it's worded thirdhand  
23 down the line, Judge, I can't --

24 524 Q. CHAIRMAN: You cannot remember a version of the  
25 statement you might have made? I don't want you to 14:43  
26 guess or speculate, you either remember it or you  
27 don't.

28 A. Judge, I would have had numerous conversations with  
29 Garda Greene.

1 525 Q. CHAIRMAN: Okay.

2 A. On various matters. So there wouldn't be one that

3 stands out.

4 CHAIRMAN: Okay.

5 526 Q. MR. MURPHY: Garda Keogh, just for a few moments if you 14:43

6 would just help us in relation to your diary for that

7 year, the diary for 2017. This is at volume 47. If I

8 can begin at page 13369.

9 A. Just the date, please?

10 527 Q. Sorry, September. Just again to assist, there are two 14:43

11 calendars, I think, Garda Keogh, aren't there, 2016 and

12 2017 they become much larger, they are the one with the

13 Intergalactic Star Wars covers on the front of them,

14 but the actual boxes are smaller, aren't they?

15 A. Yeah, that's correct. Judge, just for clarification, I 14:44

16 had the diaries but I actually thought this would all

17 be over by 2017 and '18 and that's why I switched onto

18 calendars, because I thought this whole episode would

19 be over. Obviously it wasn't and by 2018 I reverted

20 back to a diary. 14:44

21 528 Q. I see. I think this is a diary that has got Rebel

22 Forces on the top, is it, as opposed to the Star Wars

23 for the early one, for 2016?

24 A. They're both Star Wars calendars, Judge.

25 529 Q. Just if you wouldn't mind looking, please, at 14:44

26 September, at page 13369, what event have you recorded

27 for 10th September?

28 A. "Nóirín retires".

29 530 Q. I think that refers to Commissioner O'Sullivan?

1 A. Yes.

2 531 Q. Could I ask you just, if you wouldn't mind, please  
3 going back to a number of references. In July of 2017,  
4 can I ask you to look at the 5th July? Again, the  
5 handwriting is very small, I would just appreciate your 14:45  
6 help in confirming what it says.

7 A. Yeah:

8

9 "Under pressure trying to stop promotions".

10 14:45

11 532 Q. Sorry, could you explain the next sentence, if that is  
12 relevant, I am not sure what it is. Does it relate to  
13 this at all?

14 A. It's not related to this.

15 533 Q. Okay. I won't ask you it then. Just the first part 14:45  
16 then:

17

18 "Under pressure trying to stop promotions."

19

20 Is it fair to say that that reflected your mindset on 14:45  
21 5th July 2017? That related to Superintendent Murray's  
22 promotion?

23 A. Yeah, well I mean -- yes.

24 534 Q. Thank you. Do you see on the 9th July.

25 A. Just in the context, stop the promotion, the way they 14:46  
26 were trying to do it, to take it into context.

27 535 Q. I think the way you record it is simply to "stop the  
28 promotion"?

29 A. Yes, obviously that's what I have written here. But in

1 the context, I mean, I haven't an essay written, it's a  
2 two-line note is all I have.

3 536 Q. I think that will be a matter for the Chairman to  
4 decide. But just in terms of number 9, the 9th July,  
5 does that relate to this issue at all? Can I ask you 14:46  
6 to explain what that says?

7 A. I can't remember exactly which letters they are. But I  
8 have a note, I am sure they're in the documents here.  
9 "Letters to GSOC".

10 537 Q. That's the second point: 14:46  
11  
12 "John Barrett mental health Leo Varadkar"?  
13

14 A. Promotions, yeah.

15 538 Q. Promotions, so that means you were writing to Leo 14:46  
16 Varadkar in relation to the promotions as well?

17 A. I presume so, Judge.

18 539 Q. Were you writing to Mr. Varadkar to ask him to use his  
19 influence to stop Superintendent Murray from being  
20 promoted? 14:47

21 A. Judge, if I could get a copy of the letter I'd have a  
22 better idea of what's in it, because I just can't  
23 remember.

24 540 Q. I don't appear to have that letter myself. Can I just  
25 ask you to confirm that you did write a letter to Leo 14:47  
26 Varadkar in relation to Superintendent Murray's  
27 promotion, seeking for it to be stopped?

28 A. If I can get the letter, I don't -- I can't -- I don't  
29 know what's in the letter, Judge. I can't actually

1 recall.

2 541 Q. You weren't asking Mr. Varadkar to assist  
3 Superintendent Murray's promotion to proceed, were you?  
4 A. No, but it would have been -- on the lines I'm sure --  
5 CHAIRMAN: Sorry, it says "and Leo Varadkar 14:47  
6 (promotions)"  
7 A. Yes.

8 542 Q. CHAIRMAN: I think the cat in the corner of the room  
9 would kind of guess what that meant?  
10 A. Yes. 14:47  
11 CHAIRMAN: I think. Until further suggestions?

12 543 Q. MR. MURPHY: Garda Keogh, could I ask you to go back to  
13 June, please?  
14 A. Sorry?

15 544 Q. Could you go back to the month of June, please, in your 14:47  
16 diary. In particular could you please look at the 29th  
17 June. I am going to ask you to read that out to assist  
18 the Tribunal understand what this says.  
19 A. 29th "Donal Ó Cualáin" and, Judge, I have written -- do  
20 you want me to read the whole wording of it? 14:48

21 545 Q. Please. I'm just not sure what it says, the print is  
22 so small.  
23 A. Okay. Judge, just for clarification, this is going to  
24 refer to a senior officer, Judge.

25 546 Q. Well, if it's not relevant to the issue, then we will 14:48  
26 leave it out. But does it refer to promotions as well?  
27 CHAIRMAN: Donal Ó Cualáin and another officer, another  
28 senior officer, meet police authority.  
29 A. Yes.

1 547 Q. CHAIRMAN: what is the next bit?  
2 A. The next bit is a separate thing.  
3 CHAIRMAN: Okay. we're not concerned with the bit  
4 under the line?  
5 A. No. 14:49  
6 548 Q. MR. MURPHY: Can I ask you: was that entry to do with  
7 promotions or was it something completely different?  
8 A. No, this is -- I presume -- I don't know, this is, I  
9 presume -- what I here is that Donal Ó Cualáin and --  
10 549 Q. CHAIRMAN: Another officer? 14:49  
11 A. -- a chief superintendent meet at the Policing  
12 Authority.  
13 550 Q. MR. MURPHY: Very well. Perhaps we will move on from  
14 that, please could I ask you to look back at May. In  
15 particular on the 15th May, there's a reference to 14:49  
16 Clare, is that Clare Daly TD, Monday?  
17 A. Yes.  
18 551 Q. Yes. So is that Clare Daly speaking about your  
19 complaints and about Superintendent Murray?  
20 A. I can't remember off hand what she was talking about 14:49  
21 but it was more than likely everything in general, I  
22 presume. The only note I have is:  
23  
24 "Clare on Vincent Browne".  
25 14:50  
26 552 Q. Just to help you in that regard, would you turn to the  
27 4th, Thursday 4th May, could you help us to understand  
28 what's in that box, please?  
29 A.

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"Nóirín PAC Barrett clash. I heard P Murray on second round promotion list."

553 Q. Okay. So you were made aware of the fact that Superintendent Murray was on the second round of the promotions list. Can I ask you to tell the Chairman who told you that? 14:50

A. I don't know was it a list that's circulated. That could have been anybody within the Guards or anything. I have no idea. 14:50

554 Q. Well, can we just see who it wouldn't have been. It wouldn't have been somebody in the Policing Authority, would it?

A. Oh, no. 14:50

555 Q. So, it is much more likely to be somebody in the Guards?

A. More than likely. But in the Guards, guards with rumours and things like that is like wildfire. So I would have -- if that -- I would have heard that fairly lively, Judge. 14:51

556 Q. This is fairly specific intelligence, it's that he's on the second round of appointments?

A. Yeah.

557 Q. Would that type of information really at that stage be only known to very high ranking officers? 14:51

A. I don't know.

558 Q. Do you remember who it was who gave you that information?

1 A. I don't have it, I don't have it written down.

2 559 Q. No, but it didn't come out of the sky, it had to come  
3 from somebody who was in the know?

4 A. Absolutely, yeah.

5 560 Q. And the number of people in the know at that time -- 14:51

6 A. It may not have come from somebody -- it may have come  
7 from somebody in the know to somebody else and then to  
8 me.

9 561 Q. I see. Can I just ask you to look down at the 25th  
10 May, is that an entry about Deputy Wallace? 14:51

11 A. Yes.

12 562 Q. Again, could you just help me to read what that says,  
13 if it's relevant to this issue?

14 A. Yeah.

15 14:52

16 "Mick Wallace brings up (it's to do with broadsheet  
17 article). The plot thickens. Broadsheet. Case  
18 about..."

19

20 The bottom part is nothing to do with this, anything to 14:52  
21 do with this

22 563 Q. I see. Could I ask you to turn back, please, to April.  
23 In particular, could you please look at the 26th April.  
24 Again, the writing is very small, but could you just  
25 help me identify, is that relevant to this issue? Is 14:52  
26 that relevant to Superintendent Murray? It starts  
27 "Mick Quinn"?

28 A. Yes.

29



1 "Just rang on behalf of Chief Superintendent  
2 McLoughlin, do I want to go back to work in Athlone".  
3  
4 564 Q. Okay. I think there aren't any other references on  
5 that page to do with what we are dealing with today, is 14:53  
6 that right, on that page?  
7 A. I would have to look at the whole page.  
8 565 Q. Take a moment.  
9 A. Yeah, I don't think there is anything.  
10 566 Q. Finally on this part, could I ask you, please, to go 14:53  
11 back to March. Can I ask you to look at the 26th  
12 March.  
13 A. Yes.  
14 567 Q. There's a reference there to "Nóirín" is that Nóirín  
15 O'Sullivan, the Commissioner? 14:54  
16 A. Yes.  
17 568 Q. Could you just identify what else is said there?  
18 A.  
19 "FF pulls support on Nóirín".  
20 14:54  
21 569 Q. To what does that refer?  
22 A. Fianna Fáil.  
23 570 Q. In terms of the 7th of that month, of March, there's a  
24 reference to Carrick-on-Shannon?  
25 A. Yeah. 14:54  
26 571 Q. It refers to somebody under pressure. Who is that?  
27 Does that relate to Murray?  
28 A. No. Can you just give a moment?  
29 572 Q. Please.

1 CHAIRMAN: what date are we looking at?  
2 MR. MURPHY: we are looking at the 7th March.  
3 CHAIRMAN: The 7th, thank you.  
4 A. Yeah, no, that's to do with my statement to do with the  
5 Tribunal, Judge. 14:54  
6 573 Q. MR. MURPHY: I see.  
7 A. That's where I thought there was a deadline for the  
8 13th and just down below it I have "statement for".  
9 574 Q. CHAIRMAN: Mr. Cullen's office is in  
10 Carrick-on-Shannon? 14:55  
11 A. Yes. I went up there, you see, trying to get that  
12 statement.  
13 575 Q. CHAIRMAN: That's just noting that you went up there?  
14 A. For the 13th.  
15 CHAIRMAN: All right. 14:55  
16 576 Q. MR. MURPHY: Yes, very good. Just finally on the  
17 diaries, could I ask you to turn to October, please,  
18 page 13370, in particular 1st October.  
19 A. Yes.  
20 577 Q. Could I ask you just to clarify for the Chairman what 14:55  
21 is in that entry, again the writing is quite small.  
22 A.  
23 "Phone call from Dave Taylor, Barrett didn't receive  
24 registered post."  
25 14:55  
26 578 Q. So I think that's David Taylor, who was the then Press  
27 Officer?  
28 A. Superintendent.  
29 579 Q. Superintendent, yes. What registered post is he

1 referring to there?

2 A. I think it was to do with the bullying and harassment  
3 complaint, the bullying and harassment, the statement  
4 that I made on the 13th March, Judge, where it went  
5 missing for six months. 14:55

6 580 Q. CHAIRMAN: Yes.

7 A. And we now established that it actually wasn't missing,  
8 but at the time I had thought -- we thought it was  
9 missing.

10 581 Q. CHAIRMAN: Yes. 14:56

11 A. So that's what it was to do with. I was trying to get  
12 that in John Barrett's hands, he was the head of HR at  
13 the time.

14 582 Q. MR. MURPHY: So had you asked for his help to try and  
15 clarify that issue? 14:56

16 A. Sorry?

17 583 Q. Had you asked for his help to try and clarify the  
18 issue?

19 A. I am sure I would have. I am sure I would have,  
20 because it came up just in a previous meeting, we 14:56  
21 touched on -- on a previous date there, on the diary  
22 entry, it is noted that -- I have  
23  
24 "Clash between Nóirín O' Sullivan and John Barrett",  
25 14:56  
26 That's initially to do with the fraud embezzlement in  
27 Templemore.

28 584 Q. Here we are in October 2017 and you referred earlier to  
29 your circle of trust. I put it to you on the first day

1 of your cross-examination that you considered  
2 Mr. Taylor to be an ally. For how long had you been  
3 speaking to him in that capacity?

4 A. I would never have heard of Superintendent Taylor until  
5 he made his disclosure, Judge. When he made his 14:57  
6 disclosure, I have already said, I would have made  
7 contact with him just to say -- because I know what  
8 it's like and he wasn't going to get a whole lot of  
9 phone calls from chiefs or superintendents to say well  
10 done or I'm behind you or anything. And I rang and I 14:57  
11 just said, listen, just offered support, that was it.

12 585 Q. Did he support you thereafter?

13 A. It wasn't --

14 586 Q. Just take that example, he's providing you with  
15 information from Garda Headquarters? 14:57

16 A. No, that's not, that's not --

17 587 Q. Where else would he get the information?

18 A. That may not have -- what you referred to earlier may  
19 not have come from him. Just because I -- there's  
20 other -- there's lot an other people that I am talking 14:57  
21 to. It doesn't necessarily mean that it was him.

22 588 Q. No, but this is a phone call?

23 A. Sorry?

24 589 Q. This is a phone call from him to you?

25 A. Yeah. 14:57

26 590 Q. Yes. So, if we just pause for a moment and go back to  
27 volume 8. Can I take you, please, to 27th September  
28 2017. We know that on that day the Justice Committee  
29 met.

1 A. Sorry, just what page is that?

2 591 Q. Yes, that's 2070, the page we've looked at before. You  
3 will recall a few minutes ago, before we looked at the  
4 diaries, I asked you I think about this Justice Dáil  
5 Committee and its meeting with Ms. Feehily of the 14:58  
6 Policing Authority. Do you have that?

7 A. Just one moment. 2070?

8 592 Q. Yes. 2070.

9 A. 17.

10 593 Q. No, 2070, please. 14:59

11 A. Yes.

12 594 Q. Thank you. Just before you go to that, I wonder if I  
13 can give you, side by side with that, volume 9, at page  
14 2655, please. Just hold them together, please, if you  
15 would. 14:59

16 A. Page 26?

17 595 Q. 55, please.

18 A. Just for clarification, just whose notes --

19 596 Q. This is a note I think prepared by Superintendent  
20 Murray based on his observation of the Dáil 14:59  
21 proceedings?

22 A. This is on 2655?

23 597 Q. Please.

24 A. Judge, just the other one is on 27 --

25 598 Q. 2070? 15:00

26 A. Yes. Whose note is that?

27 599 Q. I am going to ask you first about 2655, please?

28 A. Okay.

29 600 Q. If you just please look at that. You will see that at

1 9:50pm he recorded that Deputy Daly brought up the  
2 question to Ms. Feehily:  
3  
4 "Some people on the promotion lists are under  
5 i n v e s t i g a t i o n. " 15:00  
6  
7 She send correspondence to the Policing Authority about  
8 it. Were you aware that Deputy Daly had sent  
9 correspondence to the Policing Authority about  
10 Superintendent Murray's promotion? 15:00  
11 A. I don't know. Em, I'm not sure.  
12 601 Q. I see. Very good.  
13 A. She may have told me. I don't know.  
14 602 Q. Do you see also on the next note, it was noted that  
15 Deputy Daly said a solicitor had sent correspondence to 15:00  
16 the policing authority about one person on the  
17 promotion list. Was that your solicitor?  
18 A. I presume it was.  
19 603 Q. So, just to be clear, you instructed your solicitor to  
20 write to the Policing Authority in relation to 15:00  
21 Superintendent Murray's promotion?  
22 A. Yes.  
23 604 Q. Yes. Can we presume that that was a letter urging the  
24 authority not to promote him?  
25 A. No, it would have been -- it would have been a letter 15:01  
26 in relation to, listen, there's a complaint here, a  
27 complaint against this man and we want to make you  
28 aware of it, just in case the Guards forget to tell but  
29 it.

1 605 Q. Did it make any complaints about the suitability of the  
2 promotion?  
3 A. Sorry?  
4 606 Q. Did it make any complaints about his suitability to be  
5 promoted? 15:01  
6 A. Did who make?  
7 607 Q. Did the letter from your solicitor make a complaint on  
8 your behalf about Superintendent Murray's suitability  
9 to be promoted?  
10 A. I would have to see the letter. I can't tell off hand. 15:01  
11 608 Q. Perhaps we might in due course have a look at that. In  
12 terms of the position, I think that if you turn,  
13 please, back to the other volume that I have given you,  
14 that's volume 8, at page 2071. Superintendent Murray  
15 will say that by the end of September of 2018, he was 15:02  
16 made aware that a meeting of the Policing Authority  
17 took place on 28th September 2018, which had Garda  
18 promotions on the agenda. Did you know about that  
19 meeting?  
20 A. I don't think so, but I don't -- can I check my diary, 15:02  
21 just to see if I anything in it?  
22 609 Q. Sure. This is 2017.  
23 A. '17?  
24 610 Q. '17.  
25 A. This says '18 on the statement. 15:02  
26 611 Q. I beg your pardon. Sorry, I think it's a typographical  
27 error?  
28 A. So '17?  
29 612 Q. '17, please.

1 A. I don't have anything for the 28th September.

2 613 Q. He will say in evidence, just to put it to you what he  
3 will say, he will say that he was made aware of the  
4 fact that a vacancy at chief superintendent level,  
5 which occurred on 20th September 2018, which applied to 15:03  
6 his position at number seven in the order of merit on  
7 the chief superintendent's promotion list was not  
8 filled even though he had positive clearance in  
9 relation to his character, which had been supplied to  
10 the authority on the 14th September. Were you aware of 15:03  
11 any of these details at that time?

12 A. I don't think so.

13 614 Q. Very good.

14 A. I don't know about that.

15 615 Q. Yes. 15:03

16 A. Obviously I have read a lot of stuff in the volumes  
17 here and there's an awful lot of other behind the  
18 scenes stuff going on, Judge.

19 616 Q. Could I ask you then, please, to move forward to -- in  
20 terms of the position, I think the position is that 15:04  
21 Superintendent Murray will say that he wrote to the  
22 Authority about his suspicions at this stage that  
23 efforts were being made by third parties to influence  
24 the clearance process. He will say at this stage he  
25 was developing a strong suspicion that the promotion 15:04  
26 for which he had been effectively put forward was being  
27 stalled because there were efforts being made by third  
28 parties to influence the clearance process and in an  
29 effort to assassinate his character for that purpose



1 with the Policing Authority?

2 A. Judge --

3 617 Q. Would you agree with me that that's what actually was  
4 taking place?

5 A. Judge, I would have had my own suspicion at the time 15:05  
6 that there was other skullduggery on the other side  
7 going on, in relation to the Policing Authority not  
8 being informed about the bullying and harassment  
9 complaint.

10 618 Q. Garda Keogh, would you agree with me that it was clear 15:05  
11 at that stage that you and some people in your circle  
12 of trust were making efforts to influence the clearance  
13 process of promotions by blocking the promotion of  
14 Superintendent Murray?

15 A. No, no. No, no. Judge. The clearance process, Judge, 15:05  
16 there's forms there, we have established that. The  
17 only thing I did in relation to the Policing Authority,  
18 the only thing I actually sent to the Policing  
19 Authority was a copy of the complaint to say, here's a  
20 complaint. Now, I understand my solicitor would have 15:06  
21 wrote letters and cc'd stuff as well. The only thing I  
22 had sent to them was the actual copy of the complaint  
23 to say, look, here you go, there is a complaint.

24 619 Q. Garda Keogh, would you agree with me about the  
25 following points: By this time would you agree that 15:06  
26 your solicitor had written letters on your instructions  
27 complaining about the promotion of Superintendent  
28 Murray?

29 A. I would have been complaining that the due process was

1 not being followed.

2 620 Q. Were you not complaining about the promotion, proposed  
3 promotion of Superintendent Murray?

4 A. Judge --

5 621 Q. Yes or no? 15:06

6 A. Yes, I would have been complaining in relation to the  
7 fact -- in relation to the way it was being done, is  
8 what I'm trying to say.

9 622 Q. Would you agree that by this time, Garda Keogh, you had  
10 liaised with Deputies Wallace and Daly and ensured and 15:07  
11 assisted them to make repeated attacks on  
12 Superintendent Murray through speeches in the Dáil,  
13 urging the authorities to consider that he was not a  
14 suitable person for promotion?

15 A. Judge, I have already stated that anything I would have 15:07  
16 said to Deputies Wallace and Daly, after that, it was  
17 never me to say, I want ye to bring this, I want ye to  
18 say that, and I can tell you, if I was to try that road  
19 and go down that road, in particular Deputy Daly would  
20 cut you in two. 15:07

21 623 Q. You see, what I have to suggest to you is that by this  
22 stage, Garda Keogh, there is clearly an orchestrated  
23 plan and you are the man with the baton in your hands.  
24 You are effectively feeding people with information,  
25 encouraging them to make speeches against 15:07  
26 Superintendent Murray, sending your solicitor out to  
27 speak on national media, giving interviews about this  
28 thing yourself, all of which are calculated to create a  
29 press storm to try and block the promotion of

1 Superintendent Murray, isn't that what has happened?  
2 A. Judge, I'm the man with the baton. Last week I  
3 couldn't hold a pen and now I've the baton in the hand.  
4 624 Q. You see, Garda Keogh, at this time what you are doing  
5 is effectively seeking to achieve vengeance against 15:08  
6 Superintendent Murray and you are working in  
7 conjunction with people.  
8 A. No, no.  
9 625 Q. Like Deputy Daly and the others, you're working  
10 together to achieve this result? 15:08  
11 A. Judge, that's not accurate. I am trying to get fair  
12 procedures for me. I am entitled to fair procedures  
13 too.  
14 626 Q. CHAIRMAN: And fair procedures as you see it is to have  
15 your complaint dealt with before he's promoted? 15:08  
16 A. Yes.  
17 627 Q. CHAIRMAN: That's what you mean by fair procedures.  
18 That's okay, I understand.  
19 A. Then they can go and promote him.  
20 628 Q. CHAIRMAN: Garda Keogh, here is what Mr. Murphy -- I 15:08  
21 don't know how far you go in agreeing with this: These  
22 things didn't happen independently or in a vacuum. So,  
23 obviously when Mr. Cullen was writing, he was writing  
24 on your behalf?  
25 A. Yes. 15:09  
26 629 Q. CHAIRMAN: That was a venture between the two of you,  
27 very clearly, as would always be the case with  
28 solicitor and client. No problem there. But he says  
29 going, briefing the deputies and when they raise the

1 issue in the Dáil, he says, it looks very like a big  
2 campaign, that everybody knew what was going on. I  
3 mean, they wanted to kill off the promotion, just as  
4 you did.

5 A. They, as in? 15:09

6 630 Q. CHAIRMAN: Deputies Daly and Wallace?

7 A. I don't, I don't think that's fair to say.

8 631 Q. CHAIRMAN: They wanted to prevent the promotion  
9 happening?

10 A. Yes. 15:09

11 632 Q. CHAIRMAN: You wanted to prevent the promotion  
12 happening. Your solicitor wanted the promotion to  
13 stop?

14 A. Prevent it where it shouldn't -- where it was wrong to  
15 promote, Judge. 15:09

16 633 Q. CHAIRMAN: Okay. I understand. I understand that.  
17 But Mr. Murphy saying to you, everybody was acting  
18 together, in concert together.

19 A. Yes. But, Judge, the Guards, what the Guards were at,  
20 the skulduggery -- 15:10

21 634 Q. CHAIRMAN: Don't mind about everybody else. I  
22 understand that, I know your point about that, or at  
23 least I think I understand it. They got the  
24 information from you?

25 A. Yes. 15:10

26 CHAIRMAN: Okay.

27 635 Q. MR. MURPHY: Thank you. Then finally on that point, up  
28 to this date you and they had sought to make the  
29 biggest possible splash in terms of media impact to

1 disseminate this complaint of yours nationwide through  
2 the Dáil, through the media, through the newspapers,  
3 not just directly to the decision-makers but to the  
4 whole country, isn't that correct?

5 A. Judge, in relation to the media, I can't - I mean, the 15:10  
6 media pick up what they want, so. Certainly, Deputy  
7 Wallace and Daly were addressing it to the Minister for  
8 Justice, whatever input they would have had as part of  
9 the Justice Committee, and obviously there was the  
10 issue of the Policing Authority, but I mean, look, 15:11  
11 there's no doubt, I'm trying to highlight that the  
12 Guards are trying to pull a stunt here and what we're  
13 doing is trying to identify that Garda management are  
14 trying to pull a stunt here to get this promotion  
15 through. 15:11

16 636 Q. Garda Keogh, again I have to disagree with you on that.  
17 But I do have to put it to you, I think it's  
18 inescapable, I have to suggest, that day after day,  
19 week after week, month after month throughout 2017,  
20 you're pursuing this campaign against Superintendent 15:11  
21 Murray in an effort to damage him?

22 A. If that was the case, like -- I mean, if that was the  
23 case, if that -- like there is -- I can't deny, Judge,  
24 that I didn't want him to be promoted, you know, of  
25 course I didn't. The way it was done is what's worse, 15:12  
26 Judge, it's the way it was done, the way the Garda  
27 management tried to do it. And obviously I went to  
28 deputies Wallace and Daly and I said, this is what  
29 they're doing, look at what they're doing. That's my

1 point on it.

2 MR. KELLY: Chairman, I wonder whether at this point  
3 the witness could have a break.

4 CHAIRMAN: Yes, certainly. Are you about to move to  
5 something else, Mr. Murphy? 15:12

6 MR. MURPHY: I am moving to the next phase of this  
7 issue.

8 CHAIRMAN: The next phase of this matter.

9 MR. MURPHY: Yes.

10 CHAIRMAN: That is probably a convenient time. Thanks, 15:12  
11 Mr. Kelly, I was forgetting. The matter was moving so  
12 rapidly, I was busy. Thanks very much. Thank you.  
13

14 THE HEARING THEN ADJOURNED BRIEFLY AND RESUMED AS  
15 FOLLOWS: 15:12

16

17 MR. MURPHY: Thank you, Chairman.

18 637 Q. Garda Keogh, just one point of fact I want to put to  
19 you, which is that Superintendent Murray will say that  
20 on 31st October 2017, he will say in evidence that he 15:24  
21 received a call from Mr. Hallinan of the Policing  
22 Authority, which told him that the Policing Authority  
23 were passing him over in the order of merit for  
24 promotion and they were going to promote the person  
25 behind him at number 8 in the order of merit. This, 15:25  
26 Chairman, can be seen in book number 8, page 2071. He  
27 will say in evidence that Mr. Hallinan wouldn't tell  
28 him why this was happening.  
29

1 So, I have to suggest to you that at this stage here is  
2 an example of how what you were doing was beginning to  
3 have an effect, and although in the ordinary course  
4 Superintendent Murray was next in line, he was  
5 effectively bypassed at that time and given no  
6 explanation?

15:25

7 A. Judge, having an effect, Judge, all I am trying to do  
8 is highlight that I have a complaint that's pending,  
9 making the Policing Authority aware of that. That's  
10 all.

15:26

11 638 Q. You see, I suggest it's much more than that. Can I ask  
12 you, please, to be shown volume 9, at page 2672? This  
13 is an e-mail written in response to that telephone call  
14 by Superintendent Murray. He will say that he wrote  
15 basically saying:

15:26

16  
17 "I find it extremely disconcerting, contrary to natural  
18 and constitutional justice, procedurally unfair that  
19 the Policing Authority could make a decision  
20 arbitrarily in my view without foundation to decline to  
21 appoint me to the rank of chief superintendent, while  
22 at the same time bypassing me in a very public fashion  
23 and moving on to the next person in the selected list."

15:27

24  
25 would you agree with me that the consequence of being  
26 bypassed was something which would have been seen very  
27 swiftly throughout An Garda Síochána and in the public  
28 domain?

15:27

29 A. Certainly in An Garda Síochána it would have been seen,

1 yes. Again, if Garda management were upfront with the  
2 Policing Authority, a lot of this would have been  
3 bypassed.

4 639 Q. You see, I have to suggest to you that in fact that  
5 this is a classic consequence of what you were setting  
6 out to do. I want to point out to you and suggest to  
7 you that what you were doing was extremely unfair to  
8 Superintendent Murray? 15:27

9 A. No, I dispute that.

10 640 Q. Do you see in the next paragraph, he says: 15:27

11  
12 "You cannot underestimate the irreparable damage this  
13 public outing of me has caused to me, my family, my  
14 character, my reputation and my career in An Garda  
15 Síochána." 15:27

16  
17 I take it you accept that somebody who had been subject  
18 to vilification in the press, repeated attacks from  
19 members of the Oireachtas and targeted, as you sought  
20 to target him, would be reasonably concerned that their  
21 reputation and their career are being damaged by this? 15:28

22 A. Judge, equally, I could have written that about myself  
23 to the Policing Authority in the way Garda management  
24 were trying to proceed with this promotion, you know,  
25 you cannot underestimate the irreparable damage, you  
26 know, that it was doing to me. Because Garda  
27 management were not upfront with the Policing  
28 Authority. The obligation really was on Garda  
29 management to be truthful and honest with the Policing 15:28



1 Authority in what was going on and they appear not to  
2 have been, Judge.

3 641 Q. Unfortunately, and we're going to see this in a few  
4 moments, I want to suggest to you that that's a  
5 completely incorrect statement. In fact, the Policing 15:28  
6 Authority was being given full information in relation  
7 to Superintendent Murray. But I am suggesting to you  
8 that what you have done here is to instigate,  
9 orchestrate and control a pattern of vilification of  
10 Superintendent Murray and here we have, publicly, a 15:29  
11 consequence flowing from that?

12 A. No. No, all I have tried to do, Judge, is inform the  
13 Policing Authority there is a complaint here, it should  
14 be dealt with first. It's as simple that. Garda  
15 management are the ones that have signed off clearance 15:29  
16 forms, they have not informed the Policing Authority  
17 during the clearance forms or after those clearance  
18 forms were signed.

19 642 Q. Garda, we dealt with this already?

20 A. Yes. 15:29

21 643 Q. I put it to you the issue in relation to disciplinary  
22 versus bullying and harassment?

23 CHAIRMAN: Yes, we have been over that, Mr. Murphy.

24 644 Q. MR. MURPHY: Yes. So, can I put to you that ultimately 15:29  
25 in this situation you have orchestrated this over  
26 several months and now we have a situation where the  
27 person who should have been promoted has been blocked.

28 A. Judge --

29 645 Q. Can I ask you to move forward, please, to 11th November

1           2017. That's at page 2072. If I can ask you, please,  
2           to turn to volume 10.

3           A.     Sorry, 2072?

4   646   Q.     2705, please. Superintendent Murray will say that he  
5           received on Saturday, the 11th November, an e-mail from 15:30  
6           Assistant Commissioner Fintan Fanning of the Eastern  
7           Region, referring to correspondence regarding his  
8           interaction with you and he indicated to Superintendent  
9           Murray that he had sent him a letter by post but had  
10          not yesterday been received and the e-mail from 15:31  
11          Assistant Commissioner Fanning asked Superintendent  
12          Murray to ignore the correspondence, because you, Garda  
13          Keogh, had decided you wanted a formal investigation of  
14          complaints to be undertaken in line with a policy  
15          document, Working Together to Create a Positive Working 15:31  
16          Environment. That correspondence was filled out at a  
17          later stage.

18

19          Could I first of all to turn in volume 10, to page  
20          2706, please? Do you see that? 15:31

21          A.     I am just looking at it.

22   647   Q.     Yes.

23          A.     Yes, Judge. Judge, just for clarification here, I  
24          see --

25   648   Q.     Perhaps I could just ask you some questions about that, 15:32  
26          Garda Keogh. Do you see the first part, it says:  
27

28          "I wish to inform you a complaint of unacceptable  
29          behaviour has been alleged against you by Garda

1           Ni chol as Keogh. "

2

3           Do you see that?

4           A.    Yes.

5   649   Q.    Now, can I just ask you, in the time leading up to that   15:32

6           letter of 9th November 2017, what direct communications

7           did you have with Assistant Commissioner Fanning?

8           A.    On the 9th of?

9   650   Q.    At this stage?

10          A.    I would have had no direct communications was Assistant   15:32

11          Commissioner Fanning.  But just --

12   651   Q.    Did you ever meet Assistant Commissioner Fanning?

13          A.    I only met him twice ever, ever, Judge.

14   652   Q.    Did you meet him in 2017?

15          A.    I don't think I met him in 2017, I don't think so.       15:33

16                Just on this, where it has -- where the statements,

17                typed statements, it doesn't have any mention of the

18                appendices that backed up with all the -- this cropped

19                up previously.  There's no mention that the appendices

20                were attached to the statement in the bullying and       15:33

21                harassment.  They were all the back up documents,

22                Judge.

23   653   Q.    Are you criticising Assistant Commissioner Fanning for

24           that?

25          A.    No, by I am saying --                                       15:33

26   654   Q.    Exactly?

27          A.    -- it appears he didn't receive them.

28   655   Q.    Would you look at the next document received?  Is that

29           a statement from you?

1 A. Yes.

2 656 Q. So, in fact, you have got no complaint to make about  
3 this correspondence at all?

4 A. Sorry?

5 657 Q. You have no valid complaint to make about this 15:33  
6 correspondence at all?

7 A. Well, what I'm saying now is, it appears that Assistant  
8 Commissioner Fanning wasn't given the appendices, which  
9 had --

10 658 Q. How do you know that? 15:33

11 A. This is his statement, let's say, of complaint. The  
12 documents attached were all the back up, to back-up the  
13 substance of what was in the letter.

14 659 Q. CHAIRMAN: This letter is not deciding anything. If I  
15 understand, the letter says there's two ways of dealing 15:34  
16 with this. One is through mediation, conciliation,  
17 whatever, if are you interested in it, and the other is  
18 to have a formal investigation?

19 A. Yes.

20 660 Q. CHAIRMAN: It both parties agree -- sorry, if all 15:34  
21 relevant parties. In this case it was Superintendent  
22 Murray and you, we will go one road, the conciliation  
23 road. It didn't matter whether stuff was there,  
24 whether all the stuff was there. The top of your  
25 statement actually refers to the appendices. But I am 15:34  
26 not so sure, I am not thinking that the appendices make  
27 the slightest bit of difference. Because that's not  
28 the purpose of his letter. Then he writes off or he  
29 e-mails or communicates with Superintendent Murray to

1 say, don't bother replying to that because Garda Keogh  
2 wants a full investigation.

3 A. Yes.

4 661 Q. CHAIRMAN: Am I understanding that correctly?  
5 A. That's correct, yes. 15:34

6 662 Q. MR. MURPHY: So can I ask you --  
7 CHAIRMAN: which you were perfectly entitled to do, by  
8 the way, and so was everybody else.

9 663 Q. MR. MURPHY: Can I ask you to indicate to the Chairman  
10 what communication you had with Assistant Commissioner 15:35  
11 Fanning before that date in 2017?  
12 A. Judge, I don't think I would have had any.

13 664 Q. None at all?  
14 A. I don't think so.

15 665 Q. Did you ever meet with Inspector McCarthy in 2017? 15:35  
16 A. Yes.

17 666 Q. Who is Inspector McCarthy?  
18 A. Inspector McCarthy, he was an inspector in Assistant  
19 Commissioner Fanning's office in Mullingar.

20 667 Q. Did you meet him? 15:35  
21 A. I think that's where he was. Yes.

22 668 Q. Did you meet him in 2017?  
23 A. I am sure I did. I would have, yes.

24 669 Q. would you mind having a look at your diary, for  
25 example, for June of 2017, say the 19th. The page 15:35  
26 reference is 13366.  
27 A. Yeah.

28 670 Q. Can I ask you just to help us to understand what's that  
29 entry?

1 A. I just have:  
2  
3 "Inspector McCarthy called to give letter."  
4  
5 671 Q. He called to your house? 15:36  
6 A. Yes.  
7 672 Q. To give you a letter?  
8 A. Yes.  
9 673 Q. Who was the letter from?  
10 A. I presume it was from Assistant Commissioner Fanning. 15:36  
11 674 Q. Yes. Did he call to you another time during 2017?  
12 A. He would have, yes.  
13 675 Q. How often?  
14 A. Not often. I mean -- I don't know. Whatever -- it  
15 would have been in my diaries whenever he called. So 15:36  
16 I'm sure, roughly five, five times I'd say.  
17 676 Q. What was the purpose of these visits?  
18 A. He gave me correspondence in relation to the bullying  
19 and harassment thing. Because there was confusion in  
20 relation to it, as I said, two chief superintendents 15:37  
21 were appointed to take the statement and different  
22 things like that, there was stuff going on behind the  
23 scenes that I didn't know about, I still don't really  
24 know what was going on. But that was -- that was it.  
25 Any letters he has given me should be in the 15:37  
26 documentation.  
27 677 Q. Was he delivering any other messages apart from what  
28 was in the letters?  
29 A. Oh no, no. No, no. Because, Judge, I was trying to

1 find out from Inspector McCarthy what they knew about  
2 what was going on in Athlone. I was actually trying to  
3 find out and it appeared that both Inspector McCarthy  
4 and Assistant Commissioner Fanning were kept completely  
5 in the dark in relation to everything that went on in 15:37  
6 Athlone. Because I was obviously trying to find out  
7 what was going on. I mentioned a report that -- I may  
8 have been taken up wrong here, if it was given -- if it  
9 has been given to the Tribunal and it is not relevant  
10 for this module, that's fine. But if it was the Guards 15:38  
11 were withholding it, I'd obviously have a problem with  
12 that. But that report as well, I was trying to find  
13 out did they ever see this report and stuff like that.  
14 But they seem to not know a whole lot about what was  
15 going on, which was incredible in that Assistant 15:38  
16 Commissioner Fanning is the assistant commissioner of  
17 the Eastern Region, where all these problems were, and  
18 he seemed to be kept in the dark about everything.

19 678 Q. Is that what he told you?

20 A. No. I wasn't talking to Assistant Commissioner 15:38  
21 Fanning.

22 679 Q. How do you know he was kept in the dark?

23 A. It was Inspector McCarthy, I was trying to find out.

24 680 Q. Do you see the letter makes reference to:  
25  
26 "... a complaint of unacceptable behaviour alleged  
27 against you by Garda Nicholas Keogh on 27th March  
28 2017. "  
29

1 Do you see the reference, page 2706.

2 A. Yes.

3 681 Q. I think you will agree with me that your evidence so  
4 far is that you have no criticism of Assistant  
5 Commissioner Fanning's stewardship of managing the file 15:39  
6 between that date and November 2017, isn't that right?

7 A. Now, can you just repeat that please?

8 682 Q. In your evidence in the earlier issues dealing with the  
9 question of the Finn investigation in particular, I  
10 think you agreed that you weren't criticising Assistant 15:39  
11 Commissioner Fanning for his stewardship of this part  
12 of the process, between March of 2017 and November of  
13 2017, is that right?

14 A. Yeah.

15 683 Q. Yes. Just moving forward, if I could, to 13th November 15:39  
16 2017. I wonder, Chairman, if we could have on the  
17 screen, 2829, please. At the time, can I ask you,  
18 Garda Keogh, did you read this newspaper article? You  
19 followed everything with close attention?

20 A. I did read this article, Judge. 15:41

21 684 Q. I think that the article indicates that:  
22  
23 "The Irish Independent has learned that bullying  
24 allegations made by Garda Nick Keogh have been the  
25 subject of intense meetings at Garda headquarters in 15:41  
26 recent days."  
27  
28 Can I take it you didn't give that information to the  
29 Irish Independent?



1 A. No, I didn't.

2 685 Q. It goes on to say:

3

4 "With one member of the Garda management strongly  
5 criticising the force's treatment of a decorated  
6 officer."

15:41

7

8 Now, I presume you didn't say that to the newspaper?

9 A. No, I had nothing to do with this article, but I do  
10 recall reading it because it was an incredible article.

15:41

11 Because for the first time, I'm someone who has made a  
12 protected disclosure, an assistant commissioner stands  
13 up and publicly backs me in relation to the what -- the  
14 bulk of the complaint, of course, is the supply of  
15 heroin in the midlands. An assistant commissioner had  
16 stood up and has actually -- that I don't think had  
17 ever happened before in the history of An Garda  
18 Síochána. So, of course I read this article.

15:41

19 686 Q. Were you surprised to see information about a meeting  
20 in the Garda Headquarters with senior officers in the  
21 Irish Independent in such detail?

15:42

22 A. Judge, look, I read the article. I read it like anyone  
23 else that has read it. I can't comment on it any  
24 further.

25 687 Q. For example, in the middle column there is a reference  
26 to:

15:42

27

28 "During intense exchanges in the recent days,  
29 Mr. Fanning pressed strongly for the appointment of an

1           assistant commissioner."

2

3           Were you aware of Assistant Commissioner Fanning's  
4           intention to appoint an assistant commissioner to  
5           investigate your complaints at that date?

15:42

6           A.    I don't know if I was aware of that. I may have been,  
7           because Inspector McCarthy was updating me with what  
8           was going on. So I may have been but just off hand, I  
9           just can't remember.

10   688   Q.    You see, in the second last paragraph it says:

15:42

11

12           "Assistant Commissioner Fanning has held a number of  
13           meetings in recent days about the case with John  
14           Barrett, the force's head of human resources, and Joe  
15           Nugent, the force's chief administrative officer."

15:43

16

17           Do you see that?

18           A.    which?

19   689   Q.    Left-hand column.

20           A.    I am just trying to find it.

15:43

21           CHAIRMAN: So am I trying to find where that is.

22           MR. MURPHY: It's on the left-hand column, Chairman.

23           CHAIRMAN: Oh, the left-hand column, I'm sorry. The  
24           last paragraph of the first column. Thank you. Yes,  
25           sorry, thank you.

15:43

26   690   Q.    MR. MURPHY:

27

28           "...the force's head of human resources, and Joe  
29           Nugent, the force's chief administrative officer. Mr.

1 Nugent proposed human resources with Joe Nugent the  
2 force chief administrative officer. It is understood  
3 Mr. Nugent proposed Garda Keogh complaints for the  
4 subject of a scoping exercise."

15:43

5  
6 Do you see that?

7 A. Yes.

8 691 Q. Were you aware of that interchange of your own  
9 knowledge at that time?

10 A. I'd say I -- I think it was just in the article that I  
11 would have read or got a lot of this information from.

15:43

12 692 Q. Do you see the next phase, it says:

13  
14 "Garda Keogh is understood to have strongly criticised  
15 the proposal as being completely inadequate in a letter  
16 sent to acting Assistant Commissioner Ó Cualáin through  
17 his solicitor John Gerard Cullen last week."

15:44

18  
19 Did you give that information to the Irish Independent?

20 A. No, I wouldn't have been aware -- no, I wouldn't have  
21 been aware of this, what went on at these senior  
22 meetings and clashes or whatever was going on there.

15:44

23 693 Q. Were you aware of the letter sent by you at that time?

24 A. I would have -- I'm presuming here, Judge, I'm  
25 presuming that Inspector McCarthy had given me a letter  
26 in relation to what was going on and we would have  
27 wrote a letter back. That's all I can do, is presume.  
28 If the letters were at hand, I might be able to -- but  
29 other than that...

15:44

1 694 Q. Do I understand your evidence to be that you were not  
2 responsible for leaking any of that information to the  
3 Independent?  
4 A. I don't think so, no.

5 695 Q. If we could move back then, please, to Volume 8. This 15:45  
6 is a document you have seen before, 15th November 2017.  
7 Assistant Commissioner Fanning appointed Assistant  
8 Commissioner Finn. It's at page 2831, sorry, Chairman.  
9 2831.

10 A. 28 -- 15:45

11 696 Q. -- 31. It's a document you have seen before, it's the  
12 letter of appointment of Assistant Commissioner Finn.  
13 A. Just the volume?

14 697 Q. Book 10. It's also on the screen?  
15 MR. KELLY: I can't find that myself. 15:45  
16 CHAIRMAN: Sorry, say that again, Mr. Kelly.  
17 MR. KELLY: I can't find that myself. What is the  
18 reference again?  
19 CHAIRMAN: It's 2831.  
20 MR. MURPHY: 2831. 15:46  
21 CHAIRMAN: This is November, I take it, '17.  
22 MR. MURPHY: It should be on Mr. Kelly's screen as  
23 well.  
24 CHAIRMAN: November '17 --  
25 MR. KELLY: It's certainly not in Volume 8, which is 15:46  
26 the reference given.  
27 MR. MURPHY: I beg your pardon, it's volume 10.  
28 CHAIRMAN: 15th November 2017, Assistant Commissioner  
29 Fanning appoints Assistant Commissioner Finn.

1 MR. KELLY: I found it now. It was just the wrong  
2 volume reference.

3 698 Q. MR. MURPHY: Then moving on, please, if you could be  
4 shown page 2835, please, in same volume.  
5 Superintendent Murray will say that on the 16th 15:46  
6 November he received a call from Mr. Nugent, CAO of An  
7 Garda Síochána, asking if he had any objection to the  
8 supply to the Policing Authority of a document prepared  
9 in 2017, outlining his interaction with you in relation  
10 to the initiation of your civil proceedings. He 15:47  
11 confirmed to Mr. Nugent that he, Superintendent Murray,  
12 had no problem with that.

13 A. Yeah. Oh yeah, I see that.

14 699 Q. Then moving on, please, to page 2074, to Sunday, 19th  
15 November 2017? 15:47

16 A. 2074?

17 700 Q. 2074, volume 8. On that date the RTÉ radio news  
18 programme had a feature regarding Assistant  
19 Commissioner Finn's appointment to investigate your  
20 allegations against Superintendent Murray. Could you 15:48  
21 please look at page 2840?

22 A. 2840?

23 701 Q. Yes, please. Do you see that article?

24 A. Yes.

25 702 Q. Could I just put it to you that the article in the 15:49  
26 first page makes reference to the initiation of the  
27 investigation and the appointment of Assistant  
28 Commissioner Finn. Do you agree with that?

29 A. Yeah.

1 703 Q. I think over the following page, in the middle of the  
2 paragraph there is a reference to:

3  
4 "The case came to public attention when Garda Keogh's  
5 solicitor gave an interview on This Week last month, 15:49  
6 when he revealed his client had no idea what happened  
7 with a bullying complaint he had lodged some six months  
8 earlier."

9  
10 That was your solicitor? 15:49

11 A. Yeah.

12 704 Q. Then it goes on to make reference to:

13  
14 "The intervention of the head of Garda human resources,  
15 John Barrett, wrote to Garda Keogh's legal team last 15:49  
16 month to say he had taken over responsibility of the  
17 case after it came to his attention."

18  
19 Do you see that?

20 A. Yes. 15:49

21 705 Q. Then if you turn over, please, to page 2842. In the  
22 middle paragraph it says:

23  
24 "In his letter of the 13th October, Mr. Barrett asked  
25 the CEO of the Policing Authority if she had any 15:50  
26 knowledge about whether a bullying allegation could  
27 have been lost or delayed in order to permit a senior  
28 guard who was accused of bullying from having to answer  
29 questions when going through a promotions process

1           overseen by the authority."  
2  
3           Do you see that?  
4        A.    Yes.  
5 706 Q.    He had you spoken to Mr. Barrett prior to that date?           15:50  
6        A.    Judge, I think I had written a letter I think to  
7           Mr. Barrett with that same question in it. From  
8           recollection, that paragraph is a question I think I  
9           posed to Mr. Barrett, I think. Certainly I think that  
10          part emanates from me, anyway, that paragraph.           15:51  
11 707 Q.    So did you share your correspondence with Mr. Barrett  
12          with RTÉ?  
13        A.    Em...  
14 708 Q.    Can I help you, Garda, by turning over the page to page  
15          2843?   15:51  
16        A.    Can I find out who wrote this article and I might be  
17          able to --  
18 709 Q.    Turn over, please, to 2843. Do you see the top of the  
19          page:  
20   15:51  
21           "Mr. Keogh's solicitor John Gerard Cullen has written  
22           to senior management in the force and the Policing  
23           Authority in recent weeks asking why there has been no  
24           obvious development in the bullying and harassment  
25           case."   15:51  
26  
27        A.    Yes.  
28 710 Q.    Would you agree that suggests that that information was  
29          given by RTÉ by you?

1 A. It appears to be, Judge, yes.

2 711 Q. Then do you see the next paragraph deals with very  
3 specific details about the correspondence. I think you  
4 can agree that can only have come from you?

5 A. Can I just read -- which paragraph? 15:51

6 712 Q. This is the --

7 CHAIRMAN: "It is understood..."

8 A. Okay.

9 713 Q. MR. MURPHY: Can we just see, the middle of that page,  
10 2843: 15:52

11

12 "In his letter, Mr. Barrett told the Authority he was  
13 repeating the question which had been addressed to him  
14 by Mr. Keogh."

15 15:52

16 A. Yes.

17 714 Q. So the person responsible for making the suggestion  
18 that documents could have been lost, inverted commas.

19 A. Yes.

20 715 Q. And imputing or implying that there was something 15:52  
21 understand taking place, was you?

22 A. Yes. At that time, Judge, at the time that's what I  
23 believed. Obviously having read through the volumes  
24 here, I see there is another side to this. But at that  
25 time I did believe that the bullying and harassment 15:53  
26 complaint, that absolutely someone was suppressing it  
27 in management in order to facilitate the promotion.

28 716 Q. But, of course, you had no evidence that that was the  
29 case at all, did you?



1 A. You see, that was the problem. I had no documents or  
2 anything like that. I just didn't know what was going  
3 on. That's what appeared to be the case.

4 717 Q. But that didn't stop you from making the insinuation  
5 that this is what had taken place. Can I ask you, 15:53  
6 please, to be shown volume 44, document 12478. I beg  
7 your pardon 12477. So, the first point I would like to  
8 draw your attention to in the letter is that  
9 Mr. Barrett is writing to Ms. Hall, the heading is  
10 "strictly confidential". 15:54

11 A. I see that.

12 718 Q. Did you have a copy of that letter at that time to  
13 furnish to RTÉ?

14 A. I don't know. I wouldn't have had a copy myself. I  
15 don't... 15:54

16 719 Q. Would you have given that copy to your solicitor?

17 A. I wouldn't have got a copy of this.

18 CHAIRMAN: Sorry, who is this letter from?

19 MR. MURPHY: Mr. Barrett, Chairman.

20 CHAIRMAN: Yes, I am sorry, I didn't see that. Thank 15:55  
21 you very much. The 13th October, sorry. Thank you  
22 very much.

23 720 Q. MR. MURPHY: So, you remember a few moments ago we  
24 dealt with the fact that Mr. Barrett told the Authority  
25 that he was repeating the question which had been 15:55  
26 addressed to him by you?

27 A. Yes, yes.

28 721 Q. Do you see here he refers to the letter from your  
29 solicitor raising a series of questions. That letter

1 was copied to the Minister for Justice and the  
2 Chairperson of the Policing Authority on 21st September  
3 2017?

4 A. That would be the right thing to do, so.

5 722 Q. But I think you will agree, that letter wasn't cc'd to 15:55  
6 Superintendent Murray, was it, by you?

7 A. No.

8 723 Q. No?

9 A. As I said, there's a lot of stuff in relation to  
10 interactions between Superintendent Murray that wasn't 15:55  
11 cc'd to me.

12 724 Q. Yes, but it's all happening out of sight, isn't that  
13 right? Garda Keogh, your methodology is to deploy  
14 correspondence left, right and centre to Superintendent  
15 Murray's superiors but not to let him know that you are 15:55  
16 doing it. And here we have, in the letter:

17

18 "In the light of extensive and other issues raised..."

19

20 MR. KELLY: Judge, is there a question in that? 15:56

21 CHAIRMAN: well, I think there is one coming,  
22 Mr. Kelly.

23 MR. KELLY: Is there? Right.

24 CHAIRMAN: I think there is, yes. At least,  
25 Mr. Murphy, I am expecting a question. 15:56

26 725 Q. MR. MURPHY: Yes. In terms of the letter --

27 CHAIRMAN: I think I could construct the question at  
28 this point, but I would prefer you to put it together.

29 MR. MURPHY: Yes.

1 726 Q. I think, Garda Keogh, would you agree with me that your  
2 solicitor's letter raised a number of questions?  
3 A. Yes.

4 727 Q. Yes. Would you agree with me that your solicitor's  
5 letter was addressed to the Minister for Justice and 15:56  
6 the Chairperson of the Policing Authority?  
7 A. You see, I can't remember off hand, but --

8 728 Q. Have a look in the middle of this letter, do you see  
9 the quotation, Mr. Barrett absolutely quotes from the  
10 letter? 15:56  
11 A. Yes.

12 729 Q. Would you agree with me that's a quotation from your  
13 solicitor's letter?  
14 A. Yes.

15 730 Q. And this says -- 15:56  
16 A. The wording, Judge, just for clarification, the wording  
17 from here, I definitely worded this part. I remember  
18 wording that part. That originally would have emanated  
19 from me, that actual wording, Judge.

20 731 Q. Garda Keogh, did you authorise this letter to be sent 15:57  
21 on your behalf?  
22 A. Well, sorry, this letter is from John Barrett to  
23 Ms. Helen Hall.  
24 CHAIRMAN: So your question.

25 732 Q. MR. MURPHY: Garda Keogh, the question is raised in 15:57  
26 quotation, the quotations question appears here to be  
27 the question raised by your solicitor, the words used  
28 by your solicitor, do you understand me?  
29 A. Yes.

1 733 Q. Now, I have to put it to you, do you agree with me that  
2 this particular letter of Mr. Barrett reflects in  
3 quotation the question which you had raised with your  
4 solicitor?

5 A. Yes.

15:57

6 734 Q. Now, let's look at the question for a minute. Here it  
7 says:

8

9 "Have the Policing Authority considered such a scenario  
10 whereby (I cannot say for sure this has happened) a  
11 complaint is made against a senior officer who is going  
12 for promotion and happens to be favoured by Garda  
13 management? Garda management delay commencing the  
14 investigation, including serving notice disciplinary or  
15 otherwise on the senior officer candidate, whereby  
16 should the Policing Authority ask the candidate to  
17 disclose such disciplinary information he/she could  
18 answer none in good faith. In the meantime the actual  
19 complaint is withheld/lost by Garda management to  
20 facilitate their choice of candidate being promoted.  
21 Is it possible!"

15:57

15:58

15:58

22

23 A. Yes.

24 735 Q. First of all, would you agree with me that that is  
25 putting forward what's referred to as a scenario?

15:58

26 A. It is a scenario.

27 736 Q. Yes.

28 A. And actually, Judge, it's not a million miles off what  
29 actually happened.

1 737 Q. would you agree with me that it is being put forward  
2 without any basis in evidence referred to in the letter  
3 to support it?  
4 A. Judge, there's an awful lot of stuff in the documents  
5 which we touched on earlier. 15:58  
6 738 Q. Garda Keogh --  
7 A. which actually, as I have said, touches on this.  
8 739 Q. Garda Keogh, please answer the question. In this  
9 letter, and this is a letter written to the Policing  
10 Authority, would you agree with me that this involves a 15:59  
11 speculation which is being put forward to the Policing  
12 Authority as a scenario but is calculated to try and  
13 block Superintendent Murray's promotion?  
14 A. Judge, it's a very relevant scenario which the Policing  
15 Authority should -- at least they're now aware for 15:59  
16 future -- any future thing, you know.  
17 740 Q. You see, Garda Keogh, I have to suggest to you that  
18 this kind of correspondence is, with respect to you,  
19 reckless, because you are --  
20 A. But, Judge -- 15:59  
21 741 Q. Just listen to me. I have to suggest to you that what  
22 you are doing is writing a letter to the Policing  
23 Authority, putting forward something which is a  
24 complete hypothesis.  
25 MR. KELLY: Judge, with respect, Judge, he is not the 15:59  
26 author of the letter. The letter I am looking at is  
27 authored by one John Barrett, which is on An Garda  
28 Síochána notepaper.  
29 MR. MURPHY: what's in quotations, as I understand --

1 CHAIRMAN: What Mr. Murphy is exploring, Mr. Kelly, is  
2 the quote that not only came from Mr. Cullen, Garda  
3 Keogh says he actually wrote it himself, that is the  
4 italicised part, and that's the bit. Mr. Barrett is  
5 quoting that and Garda Keogh is robustly asserting his 16:00  
6 entitlement to do so.

7 MR. KELLY: Yes. What I had also understood was that  
8 the question was framed in terms of this letter, namely  
9 from Barrett, and it's quoting another letter. All I  
10 am merely asking is, would it not be better to actually 16:00  
11 act the other letter as well rather than phrase it and  
12 contextualise it within this one document.

13 MR. MURPHY: I can suggest that Mr. Kelly can do that  
14 in his re-examination, Chairman.

15 MR. KELLY: It's just I would like fair questions put 16:00  
16 to witnesses.

17 CHAIRMAN: I don't think it's a problem. Let me just  
18 explain. We know the source of the part in italics,  
19 which is the relevant part that Mr. Murphy is  
20 examining, exploring. We know that that comes from a 16:01  
21 letter written on Garda Keogh's behalf. We know that  
22 that actual paragraph was written by Garda Keogh  
23 himself. So he's in a perfect position to defend it,  
24 it seems to me. That's exactly what he's doing. So I  
25 think Mr. Murphy is entitled to explore it. Have you 16:01  
26 much more on this topic, Mr. Murphy? If you have a  
27 minute or two, well and good, if you have a bit more  
28 than a minute or two, I mean two or three minutes, not  
29 a problem.

1 MR. MURPHY: Two minutes, Chairman.  
2 CHAIRMAN: Okay. Then I think we will proceed.  
3 MR. MURPHY: I will finish it off.  
4 CHAIRMAN: Okay. I mean there's a limited amount  
5 really because I think it largely speaks for itself. 16:01  
6 MR. MURPHY: Yes.  
7 CHAIRMAN: The inferences we can debate in due course.  
8 742 Q. MR. MURPHY: Garda Keogh, at this stage would you agree  
9 with me that at this point in time Superintendent  
10 Murray's promotion is imminent? Yes? 16:02  
11 A. It would appear so.  
12 743 Q. Would you agree with me that the letter that you wrote  
13 to Mr. Barrett was yet another example of an attempt to  
14 prevent that from happening?  
15 A. No. No, Judge, the wording on this, it's not as 16:02  
16 simple, because the wording -- at that time I believed  
17 -- I know -- I knew there was skullduggery going on by  
18 Garda management in relation to the Policing Authority.  
19 I didn't know exactly what. So that was as far as I  
20 could go, where I said "in this scenario" and in it I 16:02  
21 say:  
22  
23 "I cannot say for sure this has happened."  
24  
25 In brackets. I put this scenario in writing. With 16:02  
26 that, I cannot say for sure this has happened. But  
27 that was what I thought at the time was happening.  
28 744 Q. You see, Garda Keogh, I have to suggest to you that  
29 that's reckless on your part. Imagine if the roles

1 were reversed and a letter was written to the Policing  
2 Authority about your promotion in these terms, would  
3 you consider that a fair exercise and intervention by a  
4 third party who was trying to stop your promotion?

5 A. If Garda management were at skullduggery in trying to 16:03  
6 pull me through into the promotion and someone wrote a  
7 letter like that, I mean, I think the Policing  
8 Authority are fully entitled to know what was going on.

9 745 Q. Except they wouldn't know it from this quotation, would 16:03  
10 they, Garda Keogh, because this quotation tells them  
11 nothing except your supposition and your speculation?

12 A. And it turns out it's not a million miles from what  
13 happened.

14 746 Q. On the contrary, I suggest to you that in fact what 16:03  
15 this is, is an attempt by any means possible to prevent  
16 a promotion of Superintendent Murray by fair means or  
17 foul in this case, reckless?

18 A. I dispute that. I put the scenario there. The  
19 scenario has been put to the Policing Authority. Bear  
20 in mind, this is the Policing Authority's first time to 16:04  
21 deal with promotions. It's their first time to deal  
22 with Garda management as well. And Garda management  
23 don't have a great record when it comes to honesty in  
24 relation to other matters and I --

25 747 Q. Garda Keogh, this is again another diversion from the 16:04  
26 question. Just finally, I put it to you today, that in  
27 this situation this is a question that you raise to the  
28 attention of the Policing Authority but didn't raise it  
29 on the factual basis at all?



1 CHAIRMAN: Thanks very much. Okay, until tomorrow.  
2 Very good. Sorry I just want to confirm something.  
3 Just so people know, there's an event happening in the  
4 castle and so we won't be sitting on Monday, the 25th,  
5 because they will have to put the place together again 16:04  
6 after the event that happens I think on the day before.  
7 So, Monday, the 25th.

8 MR. MURPHY: Thank you, Chairman.

9 CHAIRMAN: Thanks very much. Okay, so 10:30 tomorrow.  
10 Very good. Thank you. 16:05

11  
12 THE HEARING THEN ADJOURNED UNTIL THURSDAY, 7TH NOVEMBER  
13 2019 AT 10:30AM

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