

COMMISSION OF INQUIRY
INTO FORENSIC DNA TESTING IN QUEENSLAND

Brisbane Magistrates Court
Level 8/363 George Street, Brisbane

On Thursday, 13 October 2022 at 9.30am

Before: The Hon Walter Sofronoff KC, Commissioner

Counsel Assisting: Mr Michael Hodge KC
Ms Laura Reece
Mr Joshua Jones
Ms Susan Hedge

1 THE COMMISSIONER: Ms Reece?

2

3 MS REECE: Commissioner, the first witness this morning is
4 Dr Ingrid Moeller. Before I call Dr Moeller, I understand
5 Ms Cooper of counsel is here to seek leave to appear on
6 behalf of a number of scientists.

7

8 THE COMMISSIONER: Yes.

9

10 MS E J COOPER: Yes, Commissioner, my name is Cooper,
11 C-O-O-P-E-R, initials E J. I'm counsel instructed by
12 MinterEllison, and I seek your Honour's leave to appear for
13 a number of scientists that are employed by Queensland
14 Health Forensic and Scientific Services. Does your Honour
15 require those names to be read into the record?

16

17 THE COMMISSIONER: Yes, you had better tell me who they
18 are.

19

20 MS COOPER: Yes, thank you. It is Kirsten Scott, Allan
21 McNevin, Thomas Nurthen, Luke Ryan, Alanna Darmanian,
22 Sharon Johnstone, and Helen Gregg.

23

24 THE COMMISSIONER: Thank you, Ms Cooper, you have leave.
25 Ms Reece?

26

27 MS REECE: Thank you, Commissioner. I call Dr Ingrid
28 Moeller.

29

30 <INGRID MOELLER, affirmed: [9.37am]

31

32 <EXAMINATION BY MS REECE:

33

34 MS REECE: Q. You are Ingrid Moeller?

35

36 A. Yes, I am.

37

38 Q. Could you please tell the Commissioner what your
39 qualifications are?

40

41 A. I have a Bachelor of Science with honours and a PhD in
42 science.

43

44 Q. Could the witness please be shown on the screen,
45 Mr Woolridge, [WIT.0011.0010.0001]. Dr Moeller, can you
46 see that statement there?

47

48 A. Yes.

49

50 Q. You have got a copy before you, a paper copy?

1 A. I do.
2
3 Q. That's a statement that you gave to the Commission on
4 6 October this year?
5 A. Yes.
6
7 Q. You have raised with us that there is an error in
8 paragraph 32(d) of your statement, which appears at page 6.
9 In subparagraph (d), the two references to paragraphs
10 should in fact be 32(b) and 32(c)?
11 A. That's correct.
12
13 Q. You wish those corrections to be placed on the record?
14 A. Yes, I do.
15
16 Q. Is the statement otherwise true and correct?
17 A. Yes, it is.
18
19 MS REECE: Commissioner, I tender the statement of
20 Dr Moeller.
21
22 THE COMMISSIONER: I'm sorry, I didn't follow what the
23 correction was, Ms Reece.
24
25 MS REECE: At page 6, at the top of the page, there are
26 subsection (c) and subsection (d).
27
28 THE COMMISSIONER: Yes.
29
30 MS REECE: Within subsection (d), there is a reference to
31 paragraphs 30(b) and 30(c). They should read 32(b) and
32 32(c), which correspond to paragraphs earlier in that
33 section.
34
35 THE COMMISSIONER: I see, thank you very much.
36 I understand. Exhibit 77.
37
38 **EXHIBIT #77 STATEMENT OF DR INGRID MOELLER DATED 6 OCTOBER**
39 **2022, BARCODED [WIT.0011.0010.0001]**
40
41 MS REECE: Q. You have worked at forensic DNA analysis
42 at Queensland Health Forensic and Scientific Services since
43 February 2004?
44 A. That's correct.
45
46 Q. And you have been a reporting scientist since
47 approximately 2007?

1 A. Yes.

2

3 Q. Prior to that role as a reporter, you worked in the
4 evidence recovery section and the DNA intelligence section?

5 A. That's correct.

6

7 Q. Dr Moeller, your statement deals with some material,
8 which the Commission is now familiar with, about some
9 issues to do with the processing of samples --

10 A. Yes.

11

12 Q. -- in the lab, both from 2018 until June this year and
13 then some decisions which were made which changed that
14 process?

15 A. That's correct.

16

17 Q. I'm not going to take you through all of your
18 statement about that, but it is obviously before the
19 Commission. Can I take you to the situation that was in
20 place, or the process that was in place, prior to February
21 2018. This is at paragraph 13 on page 2 of your statement.
22 You say that:

23

24 *Prior to February 2018, samples in the*
25 *quantification range of 0.001 to*
26 *0.0088ng/ μ L would go through an*
27 *automicrocon process after extraction and*
28 *quantification and prior to amplification.*

29

30 A. That's correct.

31

32 Q. That process was then changed in February 2018, wasn't
33 it?

34 A. Yes, it was.

35

36 Q. Briefly, that process was that samples within that
37 change were no longer auto-microconned?

38 A. That's correct.

39

40 Q. And in fact, they wouldn't then be further processed
41 at all unless --

42 A. That's correct. I mean, there were some exceptions,
43 yes.

44

45 Q. You say in your statement that you noticed perhaps in
46 the latter half of last year that the majority of DIFP
47 samples, so within that range, that you were seeing go

1 through, because steps had been taken to process those
2 particular samples, were returning useable profiles?

3 A. Yes, that's correct.

4
5 Q. What impact did that have on you?

6 A. I was quite alarmed. Actually, I was a bit horrified.
7 I brought it to the attention of my manager, Kylie Rika,
8 and she immediately escalated that up, my concerns, to her
9 manager, and since then, we've been very vigilant with
10 those samples and trying to process in the way we think
11 they should actually be processed.

12
13 Q. Those are the samples which you actually see in that
14 range?

15 A. Yes, that's right.

16
17 Q. We've heard evidence in the Commission that there are
18 some samples in that range that you simply wouldn't see as
19 reporting scientists, because they don't progress to the
20 statement stage?

21 A. That's correct. A lot of the DIFP samples were dealt
22 with with the analytical section. They didn't actually go
23 on to one of our work lists. So staff members in the
24 analytical section would validate those samples, and unless
25 there was some particular reason for - that they appeared
26 to us, either because of a statement or a scientist may
27 have a look at a case in its entirety, then you might
28 actually see those samples. Otherwise, it was very
29 difficult for reporting scientists to see those samples.

30
31 Q. You became aware that Ms Rika was collecting data
32 about this issue --

33 A. Yes.

34
35 Q. -- in the form of a spreadsheet?

36 A. That's correct, and I actually added some of my
37 samples to that spreadsheet, and she then took that
38 spreadsheet to a management meeting. That's my
39 understanding.

40
41 Q. Beyond raising it with your line manager, you also
42 escalated it beyond her, didn't you?

43 A. Yes, I did.

44
45 Q. Who did you escalate your concerns to?

46 A. In March this year - I think that was March - just let
47 me refer --

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. Paragraph 20 of your statement, if that refreshes your memory.

A. Yes. I emailed Lara Keller on 16 March 2022, this year. I was quite concerned about seeing a lot of these DIFP samples actually giving us very good profiles. I requested a meeting with her, which we did actually have, and I once again - well, I told her how concerned I was and that this was a serious matter.

Q. If I could ask that exhibit IM-03 be shown, that's [WIT.0011.0013.0001]. Dr Moeller, that's a little bit hard to read on the screen, perhaps, but on your copy, are you able to read it, on the paper copy?

A. Yes.

Q. Thank you, Mr Woolridge. Dr Moeller, you see some notes here. They are not your notes, are they?

A. No, they're not.

Q. They have been shown to you by me?

A. That's right.

Q. You have read those, and do you accept that they are a reflection of what you told Lara Keller?

A. Yes, they are.

Q. Sorry?

A. Yes, they are.

Q. There is a note there:

*It's possible criminals are getting off
scot free in Qld.*

Do you remember saying something like that to Lara Keller?

A. Yes, I do.

Q. There is also a note there that you were "scared of Cathie"?

A. That's right. We organised the meeting when Cathie wasn't at work yet, because I was --

THE COMMISSIONER: Q. You organised the meeting what?

A. Prior to her arriving at work.

MS REECE: Q. It was an early-morning meeting?

1 A. Yes.
2
3 Q. Is that part of the reason why you went to Lara
4 Keller, not --
5 A. Absolutely. Absolutely, yes.
6
7 Q. When you had this discussion with Ms Keller, a public
8 interest disclosure was discussed?
9 A. Yes, it was.
10
11 Q. You understood that that was - well, what did you
12 understand a public interest disclosure to be?
13 A. That Lara would escalate the matter, or the concerns,
14 above her and that it would be investigated further for the
15 seriousness of it.
16
17 Q. The specific issue that you raised with her was this
18 DIFP threshold?
19 A. Yes, it was, yes.
20
21 Q. Why did you take it to her?
22 A. Well, it comes from a long history of working in the
23 department. I have raised matters in the past. They
24 haven't been dealt with or at least investigated. I felt
25 that the management team meeting, as in Justin Howes' level
26 and above, were aware of DIFP issues, and we were still not
27 processing those samples, and I thought I have to go
28 somewhere else. I went above Cathie and I went to Lara.
29
30 Q. What kind of relationship do you have with Lara
31 Keller?
32 A. I quite like Lara. I think she's empathetic. I feel
33 like it's a good working relationship that I have with
34 Lara.
35
36 Q. Her response to the concerns that you raised was that
37 she was going to act on them?
38 A. From her facial expression, she was quite shocked and
39 she said, "This is serious", or words to that effect, and
40 she was going to escalate it.
41
42 Q. Are you aware of what occurred after that escalation
43 or, in fact, whether she did escalate it?
44 A. My understanding is she did escalate it, but it didn't
45 go any further.
46
47 Q. How do you know that, or what is that understanding

1 based on?

2 A. I understand that Kylie Rika also had a similar

3 discussion with Lara Keller about her concerns, roughly at

4 the same time, a PID was also discussed with Kylie and we

5 did discuss it some time afterwards, and she had become

6 aware that it had not progressed any further.

7

8 THE COMMISSIONER: Q. Dr Moeller, what we're discussing

9 is a public interest disclosure?

10 A. Yes.

11

12 Q. Were you the person who generated the public interest

13 disclosure - that is to say, was it in your name or was it

14 in Ms Keller's name?

15 A. I don't think it was in my name. I wasn't told.

16

17 Q. You didn't sign it, at any rate?

18 A. No, I didn't sign anything.

19

20 Q. A public interest disclosure is actually a formal step

21 under a statute, isn't it? You're not aware of that?

22 A. No.

23

24 Q. It's a step under the Public Interest Disclosure Act

25 2010, but you were discussing a public interest disclosure

26 with Ms Keller?

27 A. Yes, I was - well, I was discussing my concerns, and

28 she mentioned public interest disclosure, so I assumed she

29 would do whatever steps were required to generate that.

30

31 Q. You're not aware that a public interest disclosure, if

32 what you were saying to her became the basis for a public

33 interest disclosure, relates to information, that is, the

34 information that you were putting forward --

35 A. Yes.

36

37 Q. -- about a number of things, but one of them might be

38 the conduct of another person that, if proved, could be

39 maladministration that adversely affects a person's

40 interest in a substantial and specific way, and another is

41 that you have information about something, about

42 a substantial and specific danger to public health or

43 safety - you weren't aware that that was the connotation of

44 what you were discussing?

45 A. I am aware of that, yes, yes.

46

47 THE COMMISSIONER: Thank you. Go ahead, Ms Reece.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

MS REECE: Thank you, Commissioner.

Q. When you went to Ms Keller, did you have a particular course of action in mind, or what was your intention in going to Ms Keller?

A. My intention was to inform someone at a senior level who might be able to take some action or at least look into it for the potential significance that it had. That was the intention in the first instance. The fact that a public interest disclosure was discussed, I felt that was a reasonable course of action.

Q. Ultimately, you wanted change, didn't you?

A. Absolutely, yes.

Q. To the process?

A. Yes.

Q. That's what it boils down to?

A. Yes.

Q. A couple of months after you spoke to Ms Keller, obviously, two things happened: the Commission of Inquiry was announced?

A. Yes.

Q. And there was also a decision at the same time that was conveyed to the lab about a change in process?

A. Yes.

Q. You have said in your statement that you were on leave at the time that that decision was conveyed to the lab?

A. That's correct.

Q. But it was done by email?

A. Yes.

Q. When you returned from your leave - for the benefit of others, this is paragraph 36 on page 7 of Dr Moeller's statement. You had been sick and arrived back at work and, when you arrived back, became aware of this decision?

A. Yes.

Q. Can you tell the Commissioner what your feeling was about it? How did you react to this decision?

A. These were samples that, before 2018, were

1 microconned. Obviously they had gone through a period of
2 time where nothing was happening to them. Now there was
3 a decision on June 6 to send those samples to amplification
4 without a microcon. I didn't understand what was
5 happening. I believed - I was quite confused by this.
6 It's not something I would have done with these samples.
7 It didn't make sense to me scientifically, and so
8 I discussed it with other colleagues and similarly they
9 were quite confused by it. From their perspective, it was
10 not the right procedure for these samples. It was quite
11 disturbing, actually. It was nonsensical, in my mind.

12
13 Q. And you emailed Lara Keller again?

14 A. Yes, I did.

15
16 Q. Why did you email her?

17 A. Well, clearly we had already been discussing it as an
18 issue, and I felt it was a follow-on from the fact that we
19 had discussed the problem and a PID. I chose Lara over
20 Cathie and Justin in the first instance, because I felt
21 like she was probably more likely to do something about it.

22
23 Q. What was her response?

24 A. She said that - I'll just have a look at --

25
26 Q. I can take you to IM-06, if that assists, which is
27 [WIT.0011.0016.0001].

28 A. Yes. She said that she wasn't an expert in DNA
29 analysis, which I understand, and that perhaps it was
30 better I direct my questions to Justin and Cathie for
31 clarification.

32
33 Q. When you wrote to her, on page 2 of that document, you
34 say:

35
36 *There is a concern among some of the*
37 *scientists that we are amplifying DIFP*
38 *samples sub-optimally so when we get poor*
39 *profiles management can say "We told you*
40 *so, there is nothing to see here".*

41
42 A. Yes, I said that and I believe that.

43
44 Q. That concern is linked to this missing step of
45 micro-concentration?

46 A. Yes.

47

1 Q. You were raising concerns also with Ms Keller that if
2 this was a ministerial decision, had the minister been
3 properly briefed on the impact of that step?
4 A. Absolutely, yes.
5
6 Q. She responded that you should raise those matters with
7 Cathie and Justin?
8 A. Yes, she did.
9
10 Q. You did do that, didn't you?
11 A. Yes, I did. It took a couple of days for me to do
12 that, but, yes, I did.
13
14 Q. Why did it take a couple of days?
15
16 THE COMMISSIONER: I'm sorry, I was distracted. What took
17 a couple of days?
18
19 MS REECE: Dr Moeller has just given evidence that she
20 wrote to Ms Keller raising her concerns about the 6 June
21 decision. Ms Keller responded, "This is not my area of
22 expertise. Please contact Cathie and Justin." She did so,
23 but several days later.
24
25 THE COMMISSIONER: I see, thank you.
26
27 MS REECE: Q. Why several days later?
28 A. I was contemplating what sort of reaction I would get
29 from Cathie. It was a bit of a - I had to - I had to work
30 out whether I call her and discuss the issues, and I've had
31 a few phone calls with Cathie that have been not great,
32 a little bit aggressive. I then opted to send an email
33 instead. I felt that was probably the better process in
34 this situation, because I was actually questioning
35 a process. So that's what I actually did. So I had to go
36 through a bit of a process where I was working out what was
37 the better option for me to ask the question.
38
39 THE COMMISSIONER: Q. And you were unwell at the time?
40 A. I was fine when I came back, yes, yes.
41
42 MS REECE: Q. So you wrote to - this is at the next
43 exhibit, just over the page, at [WIT.0011.0017.0001]. At
44 the bottom of that page there, you wrote to Cathie and
45 Justin?
46 A. Yes, I did.
47

1 Q. You told them you had missed a lot of the discussions
2 because you hadn't been there?
3 A. Yes.
4
5 Q. And this is where you really express to them your
6 concern about the new approach?
7 A. Yes.
8
9 Q. Over the page, on page 2 of this email. You give them
10 some practical examples there of samples that you have
11 picked up from the P2 work list?
12 A. Yes.
13
14 Q. And even looking at samples which had gone through the
15 auto-amp process and then microconning them?
16 A. Yes.
17
18 Q. And you were telling them that you had seen good
19 results?
20 A. Yes, I had.
21
22 Q. On that note, in your statement, when you talk about
23 this particular range of quantitation, these samples in
24 this particular range, at paragraph 30 you talk about some
25 DIFP samples which you chose to concentrate in this way
26 following the initial amplification process after 6 June?
27 A. Yes.
28
29 Q. They included a swab taken from a child's perineum?
30 A. That's correct.
31
32 Q. Which ultimately produced a four-person mixture?
33 A. That's right.
34
35 Q. With a DNA profile able to be obtained with a very
36 high likelihood ratio?
37 A. Yes.
38
39 Q. Over 100 billion times more likely to have occurred if
40 the suspect had contributed to the DNA profile?
41 A. That's correct.
42
43 Q. Rather than if he had not?
44 A. Yes.
45
46 Q. And that's the highest likelihood ratio?
47 A. That's the highest figure we quote in our statements

1 of witness.
2
3 Q. You go on to detail another sample in relation to what
4 I understand was a matter involving a child, which again
5 a profile was able to be obtained from?
6 A. Yes.
7
8 Q. I'm sorry to jump around like this, but the response
9 from Cathie was that Justin would discuss it with you?
10 A. Yes.
11
12 Q. And did he ever speak to you about it?
13 A. No.
14
15 THE COMMISSIONER: Q. Now, so I understand it,
16 Dr Moeller, on 17 June you raised the matter with
17 Ms Keller --
18 A. Yes.
19
20 Q. -- who was then the executive director of FSS?
21 A. Yes.
22
23 Q. She advised that you raise it with Mr Howes or
24 Ms Allen?
25 A. That's correct.
26
27 Q. You raised it with Ms Allen and Mr Howes and told them
28 directly that you have been looking at the DIFP samples
29 which have been tested without the concentration step first
30 having been undertaken, and you've been processing them
31 again by having a part of the sample micro-concentrated --
32 A. Yes.
33
34 Q. -- and then processed so that you can analyse it?
35 A. That's correct.
36
37 Q. And whereas the processing without the microcon
38 resulted in a deficient profile --
39 A. In quite a few of them, yes.
40
41 Q. In quite a few?
42 A. Yes.
43
44 Q. -- you were obtaining useable profiles when you took
45 the step of micro-concentration?
46 A. Yes.
47

1 Q. The process being undertaken not only was not
2 achieving the best result but meant that, to get the best
3 result, you were micro-concentrating after part of the
4 sample had been wasted?
5 A. That's correct. Had we been microconning them
6 straight away --
7
8 Q. You would have got a higher concentration?
9 A. Possibly, yes, yes.
10
11 Q. So you said that to Ms Allen and Mr Howes by email, as
12 the executive director suggested, on 20 June 2022 and never
13 received a meaningful response?
14 A. I didn't get a meaningful response from Cathie. She
15 deflected to Justin, and I didn't get a response from
16 Justin.
17
18 Q. Well, he got the email from you, anyway, didn't he?
19 A. That's true, yes.
20
21 MS REECE: Q. Dr Moeller, there was then a further
22 decision on 19 August this year?
23 A. Yes.
24
25 Q. You have outlined your concerns with that decision.
26 You say at paragraph 43 you were surprised at this second
27 decision - or the scientists were surprised?
28 A. Sorry, what paragraph?
29
30 Q. Paragraph 43.
31 A. Yes.
32
33 Q. The concern that you held was about the exhaustion of
34 samples?
35 A. My concern was that a blanket 35 microlitre microcon
36 was going to be applied to all of the DIFP samples, and
37 I felt in some instances where samples didn't have very
38 much DNA in them, then a microcon to full was probably
39 going to be more appropriate. That was my concern. We
40 were also told at the time that 35 microlitres was the
41 option to use - well, was the process to use; it wasn't an
42 option - because it allowed sample preservation for future
43 testing. That was the first I've ever heard of that
44 concern in our laboratory.
45
46 Q. So, sorry, the exhaustion concern that was raised was
47 by those who were conveying the decision to you?

1 A. That's correct, yes.
2
3 Q. What is your view of that concern that was explained
4 to you on that day?
5 A. The exhaustion?
6
7 Q. Yes.
8 A. Look, I understand that some samples may benefit from
9 going elsewhere for different processes, if they are
10 available. However, I also believe that microconning
11 a sample to its fullest can possibly give us a really good
12 result right now. There's always been a bit of a concern
13 in the laboratory about the delay of putting results out,
14 and rightfully the Queensland Police Service would like to
15 have a result sooner rather than later. So, for me,
16 holding on to a sample for possibly a process down the
17 track was probably less - in my mind, perhaps less
18 beneficial than trying to get the best result now.
19
20 Q. During the meeting when this decision was conveyed to
21 the scientists in the lab, you had, in advance of the
22 meeting, sent through some questions, which are attached to
23 your statement?
24 A. Yes, to Helen Gregg, yes.
25
26 Q. What do you recall was the response from Ms Gregg
27 either to those concerns that you put forward in writing or
28 to concerns that were raised during the meeting?
29 A. Ms Gregg was wanting to follow the directions of the
30 memo.
31
32 Q. And the memo was from?
33 A. The - I think it was the acting director-general.
34 I can't recall.
35
36 Q. Were the issues that you had raised specifically
37 addressed in the meeting?
38 A. No, no.
39
40 Q. I will just go back to one of the things you were
41 saying when you were speaking to the Commissioner.
42 I understand from your evidence that your preference is
43 definitely to microcon prior to samples going to amp but
44 that what you were in fact seeing from the auto-amp process
45 is that some useable profiles were being obtained from that
46 process?
47 A. Yes, yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. But your view is that there is value in the microcon step because of what you were seeing in other cases?

A. Yes.

Q. My understanding of your evidence, Dr Moeller, is that your preference is for there not to be a blanket rule or approach imposed?

A. That's right. For a case scientist or a reporter to actually make an assessment based on quantitation values, what they feel might be the best for that particular sample.

Q. Is that process that you have just described supported by the current workflow in your job, the current way samples come through the various teams?

A. So other samples, yes, yes.

Q. Prior to 6 June this year, did reporting scientists have anything to do with some samples that were - I'm sorry, I withdraw that question. I'm being confusing. There were a lot of samples that you never saw as reporting scientists; do you agree with that?

A. I do agree with that. We did touch on earlier that these samples would be validated, looked at and validated in the analytical team, which meant those samples weren't populating the lists that the reporting team would actually look at and manage samples. So these samples basically dropped out of sight, unless --

THE COMMISSIONER: Q. What you are saying is that within that part of the laboratory that processes the samples up to the point of generating a profile that you get as a reporting scientist, within that part, the analytical part, somebody has the job of looking at the numbers generated by the quantitation process?

A. Yes.

Q. And looking at it sample-by-sample, they look at the quant, and if the quant is within a particular range, they shift it - they confirm that it ought to go to the list that will not go on to the reporting scientist for profiling?

A. Yes, yes.

Q. So you won't see it unless you are doing a witness statement?

1 A. Or I'm doing - looking at a case in its entirety
2 for --

3
4 Q. For another reason?

5 A. -- for other reasons. That doesn't occur very often,
6 but for other reasons, and I might actually detect it then.
7 The problem with the analytical team doing that particular
8 process was that with sexual assault cases, for instance,
9 on the page that they look at, they will see a reference to
10 whether spermatozoa were seen. My understanding is they
11 weren't asked, or it wasn't their job, to actually look for
12 spermatozoa, a reference to it, and then take that into
13 consideration when they didn't - when they processed that
14 sample as insufficient. I think that was quite a problem.

15
16 Q. Your understanding is that it is done purely on
17 a numerical basis?

18 A. That's right.

19
20 Q. Not on a qualitative basis?

21 A. Yes, yes.

22
23 MS REECE: Q. There has been some discussion in the
24 hearing about the merits of a case management approach to
25 processing samples. Do you have a view about that?

26 A. In what regard?

27
28 Q. In the sense of the different workflow or different
29 approach to scientists having access to samples at an
30 earlier stage - reporting scientists?

31 A. Certainly samples in that - which has become
32 a problematic area, absolutely. I do see there is merit in
33 case scientists, particularly with the larger cases, having
34 ownership of the larger cases and that they can actually
35 make their assessments on samples in more a contextual case
36 basis. So there are processes that would be beneficial,
37 I feel, and that on the whole we're not doing.

38
39 THE COMMISSIONER: Q. Dr Moeller, paragraph 43 of your
40 statement is on the screen, where you refer to the meeting
41 called by Ms Gregg. You mention an email there. Would you
42 go to that email, exhibit 8 to your statement,
43 [WIT.0011.0018.0001]. It is exhibit 8 to your statement.
44 Have you got it there?

45 A. Yes, I do.

46
47 Q. This was, in effect, a question on notice.

1 A. Yes.

2
3 Q. You put some specific propositions, problematical
4 propositions, asking whether the decision-maker was aware
5 of these points of prejudice involved in the decision
6 before making the decision. Did you get any response to
7 that? Did you get an email response, first?

8 A. No. Look, I sent this email in advance because
9 I thought it was fair for Helen Gregg to know concerns in
10 advance and that would possibly be broached by concerned
11 scientists. I've also wanted these issues addressed, if
12 she could address them in that forum, so that we would all
13 become aware of the basis of some of the decisions that had
14 been made.

15
16 I was interested in knowing who had actually made the
17 decision, because I felt it was important that a scientist
18 or scientific thoughts had gone into making some of these
19 decisions, so I felt that was really important.

20
21 We have a lot of experience in DNA profiling. I feel
22 it's important that the scientists actually get asked for
23 some of these decisions. We see it every day. For me, it
24 was important to know whether the scientists had actually
25 participated in the decision-making.

26
27 Q. Were these points that you raised ever answered by
28 anyone, to this effect: a decision might be made taking
29 into account lots of factors, and your concern, as
30 I understand it, was that these factors should be taken
31 into account?

32 A. Yes.

33
34 Q. And if they were taken into account, there might be an
35 explanation why other factors overrode the weight to be
36 given to these?

37 A. That's right, yes.

38
39 Q. So my question to you is, was that question ever
40 answered?

41 A. No.

42
43 THE COMMISSIONER: Yes, Ms Reece.

44
45 MS REECE: Thank you, Commissioner.

46
47 Q. Dr Moeller, I'm going to take you back quite a long

1 way now to 2008, and this is at paragraph 56 of your
2 statement, on page 10, under the heading "Operation Golf
3 Alcove".

4 A. Yes.

5
6 Q. That operation related to the murder of a young woman
7 in Gladstone?

8 A. That's correct.

9
10 Q. It was a case where the murderer was unknown to her?

11 A. That's correct. There was no suspect associated with
12 that case.

13
14 Q. And the DNA evidence in that case took on a particular
15 significance in the circumstances?

16 A. Yes, it did, actually.

17
18 Q. You talk about that operation in the context of
19 a contamination event that occurred that year in the lab?

20 A. Yes, yes.

21
22 Q. How did you first become aware or when did you first
23 suspect that there was a contamination event or that
24 contamination was impacting on samples that you were
25 looking at?

26 A. I was doing - I was given the task of ownership of the
27 case at the time. Back in those days, we were actually
28 given bigger cases and we would actually look at the whole
29 case, look at the case in its entirety. It was one of my
30 first big cases I was given as actually a reporting
31 scientist. So whilst I was actually looking at some of the
32 samples, analysing the DNA profiles, I noticed that one of
33 the controls on the extraction batch, where you extract the
34 DNA, had significant contamination. I was very concerned
35 about that, because there should be no DNA in these
36 negative controls, and I immediately told my line manager,
37 who was Kylie Rika, and Kylie and I told Justin Howes.

38
39 Q. What do you recall occurred as a result of you
40 alerting Mr Howes to that issue?

41 A. I recall that nothing happened.

42
43 Q. You say in your statement that you saw more samples
44 come in for that same case over the following months?

45 A. Yes.

46
47 Q. It was a case with a large number of samples?

1 A. It was a very big case, yes.
 2
 3 Q. Those samples continued to be processed?
 4 A. Yes, they did.
 5
 6 Q. And that continued from about February to late June
 7 2008?
 8 A. Yes.
 9
 10 Q. Until eventually an opportunity for quality
 11 improvement was instigated?
 12 A. Well, actually, during that five-month period, five -
 13 they're called OQIs, opportunity for quality improvement,
 14 so they're a means of bringing to light an issue which
 15 needs to be addressed - during that actual five-month
 16 period where samples were being processed, five OQIs were
 17 initiated, so people were aware there were problems. To do
 18 with that particular type of contamination, in total, 17 -
 19 I think I've got 17 - OQIs were raised.
 20
 21 Q. Yes, that's my mistake. I should have said, rather
 22 than that was when it was raised, that during that period
 23 of time there was a number of OQIs?
 24 A. There were five raised, initiated, which means that
 25 people became aware of it and raised OQIs in the five-month
 26 period.
 27
 28 Q. Ultimately what occurred as a result of those OQIs
 29 being raised?
 30 A. For Golf Alcove, there were many samples that were
 31 failed because we couldn't confirm the integrity of those
 32 samples. We couldn't for sure say whether the samples were
 33 contaminated or not, and we erred on being cautious and
 34 failing those samples.
 35
 36 Q. Did some of those samples that were failed include
 37 samples that you had processed for Golf Alcove?
 38 A. Yes.
 39
 40 Q. And those were samples which had initially been
 41 validated?
 42 A. Yes, yes.
 43
 44 Q. At paragraph 63, you talk about those samples being
 45 investigated retrospectively. That was as a result of the
 46 OQIs being raised and action being taken?
 47 A. Yes.

1
2 Q. But that didn't occur for some five to six months
3 after you first raised the concern?

4 A. That's correct, yes.
5

6 Q. In the meantime, the contamination continued to occur?

7 A. Yes, it did.
8

9 Q. Do you recall ultimately what the cause of the
10 contamination was?

11 A. A new process had been brought in the previous year.
12 It was called DNAIQ. It was a means of isolating DNA -
13 well, securing DNA in a solution whereby then you could
14 remove - I'll explain it a little bit better. DNAIQ
15 involves silica beads with a magnetic - a magnet coated
16 with silica. You can change the pH on those silica beads.
17 So DNA is negatively charged. If the silica beads, through
18 a particular buffer, become positively charged, the DNA
19 binds to those. You can then, with a magnet, remove those,
20 so now we've got our DNA harnessed, and then you can remove
21 the solutions, wash the beads, they are still secured
22 because they are secured via magnet, any inhibitors can be
23 removed, and then you can put another buffer in, which will
24 release those - changing the pH, will release the DNA for
25 further processing.
26

27 This was a process that we brought in in 2007, end of
28 2007. We still use that process. Some modifications, but
29 the principles are the same.
30

31 My understanding of what happened was that there was
32 a leakage - so particular plates that were being used had
33 a seal put on top. My understanding is there was leakage
34 between the wells, and that was causing the
35 cross-contamination with the DNA.
36

37 THE COMMISSIONER: Q. That is, at a particular stage
38 that you are discussing, you have multiple samples in
39 little tubes?

40 A. In wells.
41

42 Q. In wells, yes.

43 A. Yes, yes.
44

45 Q. So they sit there as a batch of - in a square of --

46 A. Ninety-six.
47

1 Q. Ninety-six wells in a little square, and pipettes come
2 in and do things to them; is that right?
3 A. Yes, yes.
4
5 Q. One has to take care, but the liquid from one well
6 doesn't enter the liquid in another well?
7 A. That's correct.
8
9 Q. And so there are steps that are taken to prevent that,
10 but somewhere that system of preserving the - quarantining
11 each sample in its particular well failed, and so it seems
12 that liquid from one well got into another well, so that
13 that sample came to be contaminated --
14 A. Yes.
15
16 Q. -- with DNA from another case?
17 A. That's right.
18
19 MS REECE: Thank you, Commissioner.
20
21 Q. Dr Moeller, you didn't yourself investigate the issue,
22 but you were seeing the results of the issue; is that
23 a fair assessment?
24 A. Yes, that's correct. I raised it. OQIs were being
25 raised. It was being investigated.
26
27 Q. In that particular case, Golf Alcove, when they were
28 retrospectively investigated for possible contamination, at
29 least from your recollection, 19 samples were failed?
30 A. Yes.
31
32 Q. That was about five months after they had initially
33 been processed?
34 A. Approximately, yes.
35
36 Q. Many of those samples, you say, were from the
37 deceased's body?
38 A. Yes, they were.
39
40 Q. Which had been found in bushland just outside
41 Gladstone?
42 A. That's right, that's right.
43
44 Q. Ultimately it was a sample from her body which
45 identified --
46 A. My recollection, it was from a tie that came from her
47 body.

1
2 Q. So an item --
3 A. Yes, that's my recollection.
4
5 Q. -- around her body, perhaps, or on it?
6 A. Yes, yes.
7
8 Q. You outlined in your statement that there was a risk
9 that one of the failed samples could have been the one that
10 actually contained the offender's DNA?
11 A. Absolutely, yes, yes.
12
13 Q. With the failure of those samples, you've made it
14 clear in your statement that there wasn't any risk that
15 incorrect results were being reported but, rather, that
16 there would be a lack of evidence?
17 A. That's right, yes.
18
19 Q. Fortunately, in that case, there wasn't that impact on
20 the investigation?
21 A. No, the case was thoroughly investigated and I'm
22 confident with the results that went out, yes.
23
24 Q. When it came to giving evidence about that matter, you
25 had some concerns about that, didn't you?
26 A. Like I've mentioned, I was a new reporter. It was
27 a very big case. It clearly had what I considered back
28 then to be a major laboratory contamination, and I was
29 quite concerned, going to court on that matter as one of my
30 first big cases and talking about the contamination.
31 I felt I wasn't experienced enough to actually - talking
32 about big contaminations is not a process that we're
33 usually necessarily trained for. It was, I felt, out of my
34 scope of abilities at that time, as a new reporter, to
35 actually deal with it.
36
37 THE COMMISSIONER: Q. As I understand it from what you
38 have said, whoever went to court had to give evidence about
39 the findings --
40 A. Yes.
41
42 Q. -- the profiles that were obtained and the
43 interpretation of the profiles, but also had to address the
44 contamination issue and explain why - what the
45 contamination issue meant, the significance of it --
46 A. Yes.
47

1 Q. -- and the lack of significance for the ultimate
2 opinions that were being offered in relation to the
3 profiles that were obtained --

4 A. Yes.

5
6 Q. -- so that the jury understood --

7 A. That's right.

8
9 Q. -- that the opinion evidence given about the profiles
10 that had integrity was not affected by the contamination?

11 A. Yes.

12
13 Q. So that had to be explained?

14 A. If it was broached, which I believe it was, yes.

15
16 Q. And so you felt out of your depth at that point in
17 your career; is that what you are saying?

18 A. So early on in my career, yes. Yes, absolutely.

19
20 THE COMMISSIONER: Yes, all right, I understand.

21
22 MS REECE: Q. As a result of that concern, who was it
23 who did give evidence?

24 A. I approached Justin Howes, and he gave evidence on
25 that case.

26
27 Q. You say in your statement that in the years following
28 that request for him to give evidence, he has said certain
29 things to you?

30 A. He has mentioned Golf Alcove in meetings in front of
31 other people many years after the actual case. I felt -
32 I actually felt belittled by it. I did make comments or
33 made faces to the effect like, oh, it's not appropriate.
34 Eventually I recall saying that, "That's basically enough",
35 and it eventually stopped, but it went on for many years.

36
37 THE COMMISSIONER: Q. What do you mean, "mentioning Golf
38 Alcove"?

39 A. It was - it was a way of - I felt it was a way of
40 Justin reminding me of a time that was, you know, a very
41 difficult time in the laboratory, a difficult time for me
42 as a reporter, or a new reporter. Bringing it up made me
43 feel like I wasn't an adequate reporter; I hadn't gone to
44 court on it.

45
46 Q. But how would he bring it up?

47 A. Look, I can't specifically say, give you, like,

1 a word-for-word example, but he would turn to me and say,
2 "Like Golf Alcove, Ingrid." It would something to that
3 effect. It was done in team meetings. It was
4 embarrassing, humiliating. It made me feel like I wasn't
5 a good reporter.

6
7 MS REECE: Q. This was also a case where you had raised
8 the concern?

9 A. That's right.

10
11 Q. Ultimately it wasn't resolved for months and months?

12 A. That's right.

13
14 Q. How comfortable did you feel giving evidence about
15 that?

16 A. I didn't. I didn't feel comfortable at all.

17
18 Q. A number of other cases were affected by the
19 contaminations that you were aware of?

20 A. I think there were many, yes.

21
22 Q. One that you have raised is Operation Golf Hussein?

23 A. That's correct.

24
25 Q. That was about three months after the first OQI was
26 raised?

27 A. Yes - well, samples were processed, I think, three
28 months after, yes.

29
30 Q. And again had to be failed retrospectively?

31 A. A lot of samples were failed retrospectively, yes.

32
33 Q. You speak about a particular murder case which was
34 affected, where there was some cross-contamination?

35 A. Yes.

36
37 Q. You recall the example in your statement. Can you
38 tell the Commissioner about that particular example?

39 A. We became aware - well, the person who was the
40 reporter for the particular case, a murder case, became
41 aware - and I don't recall how; maybe it was through the
42 police, I don't know - that one of his samples from his
43 case had cross-contaminated a sexual assault case, and we
44 were told - and once again, like I said, I don't know
45 specifically who told us, but my understanding is that
46 victim of the sexual assault case was then actually asked
47 questions about the murder case, and I was horrified.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. After some time, in July 2008 DNAIQ extractions were ceased?

A. They were put on hold, yes.

Q. You have exhibited the OQI which refers to those earlier OQIs being raised, but the actual report you annexed to your statement, at IM-10. That was in December 2008?

A. Yes.

Q. The report of the OQI is really the end of that story of the DNAIQ contamination, isn't it? It's the final chapter?

A. I believe so, yes, yes.

Q. Dr Moeller, earlier in your statement, you raise an issue of sperm microscopy?

A. Yes, I do.

Q. Your knowledge of that issue is based on the fact that you were working in the lab at the time?

A. Yes.

Q. And you're friends with Amanda Reeves?

A. Yes.

Q. And Kylie Rika?

A. Yes.

Q. And Emma Caunt?

A. Yes.

Q. Other people who were involved in raising the concerns about sperm microscopy?

A. Yes.

Q. Some of them were involved in the work to address the issue?

A. As in?

Q. Project #181.

A. I know that project was run by Matthew Hunt. I don't know who actually specifically contributed to the project.

Q. You didn't work on it?

A. No, I didn't.

1
2 Q. The issue that arose was that in 2015, some case
3 scientists noticed that there was a problem, or thought
4 there might be a problem, when they were observing sperm
5 cells on slides in sexual assault cases?

6 A. They weren't observing sperm cells. In some of their
7 samples, they were getting - my understanding is they were
8 getting a male DNA profile, which would have possibly -
9 well, the assumption was that it should probably have come
10 from sperm. It may have been an internal vaginal sample,
11 but sperm wasn't actually being detected, and that's what
12 raised the alarm bell. I think it's something like that.
13 I might be a bit shaky with some of the details there.

14
15 Q. That's all right. You say at paragraph 45 that when
16 there was further investigation of a number of samples, it
17 was observed that whilst the ER, or evidence recovery,
18 slides - which were the ones that were analysed; is that
19 right?

20 A. They're the slides that are made straightaway.

21
22 Q. That they were showing no sperm?

23 A. That's correct.

24
25 Q. Whereas subsequent slides from the differential lysis
26 process, the diff slides, did show sperm?

27 A. Yes.

28
29 Q. At that stage, examining that second slide wasn't
30 a routine practice?

31 A. So, for instance - I have an example. If, for
32 instance, an internal sample, vaginal sample, did not come
33 back in the first instance as - come back as being positive
34 for semen, those samples wouldn't actually be processed
35 further. I may not have answered your question, actually,
36 I just realised.

37
38 Q. I take it from your response that if that initial
39 result showed no sperm, then they wouldn't be processed
40 further?

41 A. And if they came back negative for seminal fluid,
42 particularly internal samples, they were considered as no
43 further action.

44
45 Q. The presence then on the diff lysis slide of sperm
46 demonstrated that there might be a problem with that
47 extraction method?

1 A. Yes, yes.
2
3 Q. You're aware that the case scientists who were
4 reporting those concerns to their line manager, they were
5 reporting to Amanda Reeves and Kylie Rika?
6 A. Yes, yes.
7
8 Q. And Amanda and Kylie escalated the matter to other
9 managers?
10 A. Yes, that's my understanding, yes.
11
12 Q. Again, this is really knowledge that you have through
13 your friendships with these people?
14 A. Yes.
15
16 Q. You are aware that there was a meeting on 9 June 2016
17 where there was an altercation between Amanda and Allan
18 McNevin?
19 A. Yes.
20
21 Q. But you weren't there?
22 A. No, I wasn't.
23
24 Q. A few months later, on 8 August, there was
25 a workaround implemented where both slides would be looked
26 at as a matter of routine?
27 A. Yes, all samples would you go through the diff lysis
28 process, yes.
29
30 Q. Your understanding was that while that was
31 a labour-intensive process, it solved the issue in the
32 sense of its immediate concern?
33 A. It made us feel like that we weren't going to miss any
34 samples, yes, and I think that was an appropriate course of
35 action at that time.
36
37 Q. You had some concerns, though, about the fact that
38 samples might have been - or evidence might have been
39 missed?
40 A. Well, given that the issue was raised in 2015, and we
41 then implemented a workaround, although several months
42 later, my concern was how long had that been going on for.
43
44 THE COMMISSIONER: Q. So from the time that the matter
45 was first reported in early 2016 --
46 A. 2015.
47

1 Q. 2015?

2 A. I think, because a scientist was raising - scientists
3 were raising the issues, yes.

4

5 MS REECE: Paragraph 44 of Dr Moeller's statement,
6 Commissioner.

7

8 THE COMMISSIONER: Q. From the time that the problem was
9 raised in 2015, nothing was done about it until August
10 2016?

11 A. That's correct. So there was that time delay from
12 actually raising it as an issue to working - or putting
13 into place a workaround. However, my understanding is
14 there has been no investigation to look back
15 retrospectively prior to - well, including 2015, and before
16 that, how long this had actually been going on for.

17

18 Q. That is to say, between when it was raised in 2015
19 until August 2016, nothing was done to change the process,
20 to obviate the problem?

21 A. That's right.

22

23 Q. And then thereafter, nothing was done - go on?

24 A. Prior, prior to 2015, samples may have been falling
25 into those categories. So nothing was looked at
26 retrospectively.

27

28 Q. And then the second thing is that even after the
29 workaround was put in place, no work was done to see what
30 might have been missed?

31 A. Yes, yes.

32

33 MS REECE: Q. You are aware through your friendship with
34 her and your role in the lab that Ms Reeves was agitating
35 this issue for some time?

36 A. Yes, both Amanda Reeves and Kylie Rika were agitating,
37 yes.

38

39 Q. Eventually there was - Project #181 reported in about
40 2020?

41 A. Yes.

42

43 Q. But that workaround had continued in the meantime?

44 A. That's my understanding, yes.

45

46 Q. Your concern now, looking back at it, is that there
47 wasn't a sort of retrospective review of samples which

1 might have been impacted?

2 A. Yes, yes.

3

4 Q. To your understanding, was there a root cause analysis
5 undertaken?

6 A. I don't know. I don't know.

7

8 Q. Your concerns about that particular issue are that it
9 took quite a long time to resolve?

10 A. So my concerns - my major concern is that scientists
11 weren't listened to. As we've already discussed with
12 DNAIQ, scientists weren't listened to. That doesn't mean -
13 when you bring up an issue, you just want it investigated.
14 It doesn't mean I'm right. It's just an opportunity to
15 assess it further, given what I'm actually seeing in the
16 laboratory. So I work in the laboratory, I see an issue,
17 I raise it, and then hopefully there will be some sort of
18 investigation or further analysis of what is actually going
19 on.

20

21 So, for me, it was a repeat of the DNAIQ situation.
22 There was a significant delay in responding to scientists'
23 concerns. Yes, a workaround was eventually brought in,
24 which is great, but then it still took many years to come
25 up with a process and to fully investigate it properly. So
26 there's always that delay - a disregard for scientists and
27 then a delay to respond to issues.

28

29 THE COMMISSIONER: Q. Could I just understand something.
30 The problem, to get it clear, was that in sexual offence
31 cases, if there was a sample taken with a view to capturing
32 the offender's sperm, then one step that's taken is to
33 create a microscope slide and to look at that slide to see
34 if you can see any sperm, and if there is any, you expect
35 to see some?

36 A. Yes.

37

38 Q. And so if you don't see any, the practice was that
39 that sample would be regarded as negative and wouldn't be
40 progressed further?

41 A. Particularly for internal samples, yes.

42

43 Q. Although a few, for reasons we need not go into, might
44 go to a second step of differential lysis, which is a step
45 that would increase the prospect of detecting sperm if it
46 was there?

47 A. Well, that's the way it ended up being, yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. Yes. But the problem is that the first step is usually the step at which an internal swab is sent for further processing if sperm is seen or is abandoned if sperm is not seen?

A. Yes.

Q. The problem having been identified - and the problem is that on occasions when sperm is not seen under the microscope, it's actually there?

A. That's what came to light, yes.

Q. That was the problem?

A. Yes.

Q. So a workaround was formulated?

A. Yes.

Q. Some eight months later or so?

A. Yes.

Q. But until that workaround was formulated, some samples might have been wrongly determined to contain no sperm when, in fact, they did contain sperm?

A. Yes.

Q. In fact, that's almost certain, because that's the error that was detected, that these things were happening?

A. Well, certainty is probably not --

Q. All right, you don't like that word?

A. No, I don't.

Q. What was found was that, on more than one occasion, a microscopic examination incorrectly found no sperm to be seen, but a subsequent step that happened to be taken showed that there was sperm?

A. Yes, yes.

Q. So we can infer that samples may have passed through that had sperm but were wrongly rejected as not containing sperm?

A. That's correct.

Q. The problem is that after the error was found, nothing was done to look at past samples again to see if any of them, in fact, had been wrongly abandoned?

1 A. That's my understanding, yes.
2
3 Q. And to this day, nothing has been done about that?
4 A. That is my understanding, yes.
5
6 MS REECE: Q. Dr Moeller, you've just invoked the DNAIQ
7 incident from 10 years before - or about eight years before
8 this incident, and you say you felt like it was another
9 instance where scientists were raising concerns and there
10 was this long period where nothing was done?
11 A. And to add to that, the DIFP issues, so --
12
13 Q. Which occurred in 2018?
14 A. Yes, so there's this repeated - repeated inaction.
15
16 Q. Because you weren't the only scientist raising
17 concerns about the contamination event, were you?
18 A. The DNAIQ?
19
20 Q. Yes.
21 A. I can't put a name, but - they were obviously being
22 raised, because OQIs were being raised. So, yes, someone
23 was seeing something.
24
25 Q. You might not be aware of who it was?
26 A. No.
27
28 Q. But you weren't the author of all of those OQIs?
29 A. No, not at all.
30
31 Q. When you saw your colleagues raising these issues in
32 the way that you have described, you were concerned that
33 they weren't being acted on?
34 A. Yes.
35
36 Q. You say at paragraph 54 that you understand that
37 Amanda was pressing for those cases to be reviewed?
38 A. I understand that she made suggestions that they
39 should be looked at, yes.
40
41 Q. You know that from her, don't you?
42 A. Yes.
43
44 Q. Because you've spoken about this?
45 A. Yes.
46
47 Q. And you've supported her?

1 A. Yes, absolutely.

2
3 Q. You go on to say that, in your view, Amanda was
4 treated poorly by Justin and Cathie?

5 A. Yes, I do.

6
7 Q. You talk about a point where she was made to sit in
8 the library for approximately eight months?

9 A. Yes.

10
11 Q. What task was she performing while she was in the
12 library?

13 A. She was taken away from her normal duties as
14 a manager. She was given a project that she didn't want to
15 do. I don't think it was particularly clear why this
16 happened. She was made to sit in a room away from her
17 colleagues and her friends, was put into a room that had no
18 windows, was very small, had a little window in the door.
19 She had, I feel, no support from Cathie and Justin. They
20 never did any welfare checks on her. They removed her from
21 emails.

22
23 The understanding was, I thought, that she would go
24 back to her position and so she would still have her emails
25 that she could go back to, because processes were changing.
26 If we go on holidays, we still get our emails, so we can go
27 back and get an understanding of what's transpired in the
28 time we've been away. She was not on emails. So she was
29 basically ostracised, and the feeling was - the feeling in
30 the laboratory was she was being punished.

31
32 THE COMMISSIONER: Q. Was any explanation given to
33 staff, any information or briefing given to staff, why -
34 Ms Reeves had been in the equivalent of Kylie Rika's
35 position, so she was the head of one reporting team and
36 Ms Rika was the head of the other reporting team?

37 A. Yes.

38
39 Q. She went on leave to come back to this; was that the
40 position?

41 A. I don't know if she was on leave. I think she was
42 just - after all the issues of Kylie and Amanda trying to
43 raise concerns about the slides situation, the issue in the
44 management meeting that happened, I don't know - I don't
45 recall the timeline. I think at some point she was put
46 into that position.

1 Q. You were giving evidence about your understanding of
2 why it had happened.

3 A. Yes.

4

5 Q. And my question is, a team leader is suddenly removed
6 from her position as a team leader of the reporting team --

7 A. Yes.

8

9 Q. -- and placed into the position that you have
10 described, but no explanation was offered to the scientists
11 whom she used to lead as to why this has happened to their
12 leader?

13 A. I don't recall there being an explanation, no.

14

15 MS REECE: Q. Do you recall that at a period, she took
16 some stress leave?

17 A. I do have a recollection there was some stress leave,
18 yes.

19

20 Q. You said, before the Commissioner asked you a further
21 question, that you felt that she was being punished?

22 A. Yes, absolutely.

23

24 Q. Again, this is only your interception, obviously, but
25 what did you think she was being punished for?

26 A. For raising an issue, for raising the sperm microscopy
27 issue and for pursuing the sperm microscopy issue.

28

29 Q. Again, to be clear, Dr Moeller, you are really giving
30 evidence about this from the point of view of someone who
31 has observed things to be happening in the lab?

32 A. Yes.

33

34 Q. To someone whom you worked with?

35 A. Yes.

36

37 Q. You don't know all the details about management
38 action, criteria that were being applied, anything like
39 that, do you?

40 A. No.

41

42 Q. You just know what you saw?

43 A. I don't know the exact details. I do recall feeling
44 very distressed about what was happening to her. I recall
45 taking her lunch in this small room that she was sitting in
46 and trying to be supportive. I also recall being concerned
47 that people saw me associating with Amanda in this room.

1 She appeared as an outcast. From my perspective, she was
2 being punished, and I was - I was worried about myself
3 being associated with her and the potential fallout, as
4 well, for being a friend.

5
6 Q. The unhappiness surrounding Amanda, what you saw as
7 her treatment in the workplace, went on for some time,
8 didn't it?

9 A. Yes, it did.

10
11 Q. There were a number of HR processes?

12 A. I believe there were some HR processes, yes.

13
14 Q. Did you take part in any of them?

15 A. No.

16
17 Q. At paragraph 55 - and if I could just ask the operator
18 to highlight the final sentence there - you say:

19
20 *Such treatment of a staff member, who was*
21 *raising legitimate and significant*
22 *scientific issues, distressed many staff*
23 *members and effectively put staff on notice*
24 *about raising scientific issues.*

25
26 A. Yes.

27
28 Q. What appetite did you have following what you saw of
29 this debacle?

30 A. I was not keen to raise any scientific issues after
31 that. Obviously I had raised the DNAIQ, which caused
32 Justin Howes to keep bringing up Golf Alcove many years
33 later, so I was already feeling a bit anxious about that.
34 Then seeing what happened to Amanda certainly didn't
35 inspire me to continue to raise issues.

36
37 Q. When you went to Lara Keller in March of this year and
38 you told her things about why you were speaking to her
39 rather than management, was that the background?

40 A. Yes, absolutely.

41
42 MS REECE: Commissioner, I apologise for my emotive
43 language. I shouldn't have said "debacle". I withdraw
44 that comment.

45
46 THE WITNESS: Can I say, it was a debacle.

47

1 MS REECE: Q. This probably ties in, Dr Moeller, with
2 what you say at paragraph 73 of your statement, under the
3 heading "Cultural issues", the fact that as reporting
4 scientists, you really represent the lab?

5 A. Yes. Obviously there are a couple of areas in DNA
6 analysis, and they all do incredibly important work. All
7 of that work culminates in the statement - providing
8 evidence in a court situation. So, as the reporter, we see
9 the end result of profiling. We have the overall -
10 sometimes, looking at the statement or the case in its
11 entirety, we can see some - particularly at statement
12 stage, obviously we see the case in its entirety, we can
13 see issues that might be present, and we then bring that to
14 light. So if we see some contaminations, which we've
15 already talked about, that's - we are the ones who often
16 see issues, bring it to light, and that does cause, in my
17 mind, a few issues because we're the ones always bringing -
18 well, other departments may be as well, but from my
19 perspective and from where I'm working, it seems to be that
20 we bring up issues and they are not received well.

21
22 Q. In paragraph 73, you say that you feel some of the
23 management team regard reporting scientists as
24 troublemakers?

25 A. Yes, I do.

26
27 Q. Have you yourself heard Cathie refer to you as
28 a group, or have you been told that?

29 A. I have been told that, yes, by several people.

30
31 Q. What have you been told?

32 A. Am I allowed to use those words?

33
34 THE COMMISSIONER: Q. Yes, just give the direct
35 evidence.

36 A. She has referred to as "those fuckers over there",
37 which is our block, when she was in an administrative block
38 and we're in a different block. We've actually adopted
39 that term now, affectionately, and call ourselves the "FRIT
40 fuckers".

41
42 MS REECE: Q. FRIT is a reference to --

43 A. Our reporting team. We've taken that on board now.
44 We call ourselves the "FRIT fuckers". Obviously it's
45 ironic.

46
47 Q. I understand. Dr Moeller, I asked you some questions

1 before about some HR processes. I will just take you to
2 paragraph 74, where you talk about a group called Workplace
3 Edge coming to the workplace?

4 A. Yes.

5
6 Q. Does that jog your memory about HR processes?

7 A. Yes, it does.

8
9 Q. This was around the time when Amanda was working from
10 the library?

11 A. I understand they came in near the end - yes, yes,
12 that's my understanding.

13
14 Q. They held some meetings with staff, or interviewed
15 staff?

16 A. They interviewed staff, and then there was a general
17 meeting, yes.

18
19 Q. There was a presentation at that general meeting?

20 A. Yes, there was.

21
22 Q. Do you recall the nature of or any of the comments
23 made during that meeting?

24 A. I will just refer to --

25
26 Q. Paragraph 75.

27 A. I made notes at that time. The comments made to us
28 were that staff were underperforming; staff were exhibiting
29 contextual bias - that was particularly alarming, because
30 it was talking about our casework, which would be a breach
31 of code of conduct, so that was particularly alarming; some
32 staff were being bullied by others - well, I agree with
33 that, because I was observing some of that; our jobs could
34 be outsourced if we didn't perform. So there were comments
35 to that effect.

36
37 Q. As a result of that meeting, you sent an email to
38 Andria Wyman-Clarke?

39 A. Yes, I did.

40
41 Q. Who was HR general manager for Health Services
42 Queensland at the time?

43 A. Yes.

44
45 Q. That's exhibit IM-12 to your statement, which is
46 [WIT.0011.0022.0001]. Thank you, Mr Woolridge. If you
47 look down that email chain, you can see your original email

1 on 7 February?

2 A. Yes.

3

4 Q. You write to Ms Wyman-Clarke that you understand that
5 she has been approached by some other staff members?

6 A. Yes, yes.

7

8 Q. And that despite feeling extremely fearful regarding
9 reprisal, you are writing to her in order to seek help for
10 your department?

11 A. Yes. A lot of people were very upset after that
12 meeting, the way it was - the way information was imparted
13 I felt was inappropriate. People's livelihoods were
14 possibly going to be affected. That was the implication.

15

16 Q. Had you been interviewed by Workplace Edge?

17 A. That I can't remember.

18

19 Q. In your email, you outline that there were ongoing
20 issues with your managing scientist and executive director,
21 who was Paul Csoban at the time?

22 A. Yes, yes.

23

24 Q. Regarding what you say was inappropriate behaviour on
25 their part?

26 A. I felt that the way the meeting was conducted - oh,
27 well, I certainly felt that the way the meeting was
28 conducted was not what I would expect from a management
29 meeting imparting information, but I also felt that Cathie
30 and Paul Csoban's behaviour was not appropriate in other
31 regards with respect to personnel, as in I understand Paul
32 Csoban may have been involved with Amanda's placement into
33 the library.

34

35 THE COMMISSIONER: Q. With what?

36 A. With her placement into the library.

37

38 MS REECE: Q. When you spoke about being extremely
39 fearful regarding reprisal, what did you mean?

40 A. Well, I could have ended up in the library with
41 Amanda. So basically anything's possible.

42

43 Q. You say at the end that you can't afford to lose or
44 leave your job?

45 A. No.

46

47 Q. Was that something you were having to contemplate at

1 that point?

2 A. Yes, yes, absolutely.

3

4 Q. Ms Wyman-Clarke responded to you at the top of that
5 email chain. Did you end up meeting with her?

6 A. I can't recall that either, no. I suspect I would
7 have, because obviously I was approaching her, but I can't
8 remember.

9

10 Q. In paragraph 78, you outline that you - this is some
11 time after this Workplace Edge meeting and your subsequent
12 email to Ms Wyman-Clarke. You say that on April 30 you
13 received an email from Cathie marked "Confidential"?

14 A. Yes.

15

16 Q. And you were asked, or you were requested, to meet
17 with her to discuss a workplace matter relating to
18 compliance with workplace record-keeping practices?

19 A. Yes.

20

21 Q. And the meeting was to take place in the presence of
22 an HR manager?

23 A. That's correct.

24

25 Q. She said:

26

27 *No decision has been made as to what, if*
28 *any, further action will be taken in*
29 *relation to this matter.*

30

31 A. Yes, she did say that.

32

33 Q. And there was a paragraph in the email titled "Lawful
34 Directions", directing you to keep the details of the
35 matter confidential?

36 A. That's right.

37

38 Q. This email chain is exhibit IM-13. You sent back
39 a number of emails asking for clarification and
40 information?

41 A. I had absolutely no idea what she was talking about,
42 and I was really concerned by the tone of the email. I was
43 worried.

44

45 THE COMMISSIONER: Can we see that email?

46

47 MS REECE: Yes. It's exhibit IM-13, which is

1 [WIT.0011.0023.0001]. It stretches back a number of pages,
2 Commissioner. Perhaps it is best commenced at page 5,
3 which actually goes on to page 6, but it starts at page 5
4 in terms of the chain of emails.

5
6 THE COMMISSIONER: Q. So you are being told that you are
7 to attend a meeting to discuss a workplace matter; you can
8 bring a union representative?

9 A. I could bring a support person, yes.

10
11 Q. Yes, a support person, who could be a union
12 representative?

13 A. It ended up being another colleague.

14
15 Q. And, over the page, I think, you must keep this matter
16 confidential, but you can talk to a legal representative or
17 to the union or to your support person?

18 A. Yes.

19
20 Q. And you can get confidential counselling if you need
21 it?

22 A. Obviously it sounded like it was going to be quite
23 traumatic by being offered counselling.

24
25 Q. Have you ever seen a letter like that sent to any
26 employee?

27 A. No, no.

28
29 MS REECE: Q. How did you feel when you received that
30 email?

31 A. Traumatized. Had no idea what it involved, really,
32 specifically. Clearly I was being offered counselling,
33 because possibly the aftermath was going to be shocking.
34 There was possibly some legal ramifications, because there
35 was some sort of lawful directions. It was terrifying,
36 absolutely terrifying, and so I tried to actually get some
37 information from Cathie in advance so I could best address
38 what was going to happen in the meeting, and I was given no
39 information at all.

40
41 Q. You then exchanged a number of emails with her, where
42 you were --

43 A. I tried to make it very conversational, take the
44 formality out of it. I did say we had talked - I had come
45 to her on previous occasions to talk to her. Strictly
46 that's probably not true. I did, one day, have
47 a conversation that she had gone on a holiday. It was more

1 of an ice-breaker. I was trying to take the sting out of
2 what was happening, perhaps, make me feel more comfortable,
3 but nothing - nothing came back.
4

5 Q. That's at page 4 of that same chain, where you say:

6
7 *... we have talked about things informally*
8 *in the past and I would like to feel we can*
9 *still do that.*
10

11 That's what you're referring to?

12 A. Yes, that was my, "Let's just chat about this", mmm.
13

14 Q. You didn't get any further information from Cathie
15 about the nature of the meeting?

16 A. No.
17

18 Q. And when you asked if you could have Kylie as your
19 support person - this is at page 2 of that email chain -
20 she said Kylie Rika is an inappropriate person for you for
21 this meeting?

22 A. That's correct, yes.
23

24 Q. Ultimately Rhys Parry was your support person?

25 A. Yes.
26

27 Q. But he wasn't allowed to be a participant in the
28 meeting?

29 A. No, that's right.
30

31 Q. What happened when you attended that meeting?

32 A. One of the first questions I was asked was whether
33 I was recording the session. I said no. So that was one
34 of the first questions. And then it came to light that
35 something had been placed into a confidential bin in our
36 laboratory. That bin is locked, so I was a little bit
37 surprised that someone actually had access to it and
38 a little bit concerned, because it's meant to be
39 confidential. So obviously something had been --
40

41 THE COMMISSIONER: Q. That's a confidential destruction
42 bin, is it?

43 A. Yes, yes. So you put things in there; you are
44 assuming they get destroyed. Obviously someone had been in
45 that bin, unlocked it, removed information --
46

47 Q. What were you asked? What were you told, rather?

1 A. I was actually asked if I had seen anyone throw
2 something into that bin, and I think it was six weeks prior
3 to the actual interview. People throw things in the bin
4 all the time. I mean, if I spent my time watching the bin,
5 I wouldn't get any work done. So it was a strange comment.
6
7 MS REECE: Q. You say in your statement you told Cathie
8 that the confidential bin is not something you watch?
9 A. No.
10
11 Q. You couldn't help her?
12 A. No.
13
14 Q. Your recollection is that the time frame of that
15 supposed disposal in the confidential bin was about the
16 same time Amanda Reeves left the workplace?
17 A. Yes, yes.
18
19 Q. Cleared out her desk?
20 A. That's right.
21
22 Q. Went to another job?
23 A. Yes.
24
25 THE COMMISSIONER: Q. So, sorry, you were sent this
26 email saying that they want to discuss a workplace matter
27 relating to compliance with a workplace record-keeping
28 practice, and when you asked what it was about by email,
29 you were told, "I'm unable to discuss this with you prior
30 to the meeting on Wednesday", you're told you can get
31 counselling, you can have a lawyer, you can have a union
32 representative?
33 A. Yes.
34
35 Q. And when you turn up, you're asked whether you saw
36 somebody throw something in a bin?
37 A. Yes.
38
39 MS REECE: Q. Dr Moeller, are you aware of whether other
40 people were questioned about that incident?
41 A. Subsequently, yes.
42
43 Q. So you weren't aware at the time?
44 A. No.
45
46 Q. But you became aware?
47 A. Well, I don't recall, but I know other people were -

1 two other people were approached, yes.
2
3 Q. Who were they?
4 A. They were Kylie Rika and Emma Caunt.
5
6 Q. Both friends of Amanda Reeves?
7 A. Yes, yes.
8
9 Q. Were you specifically asked about Amanda Reeves during
10 that meeting?
11 A. Her name didn't - I don't recall her name coming up.
12
13 Q. The connection that you have made between her
14 departure from the workplace and what was raised in that
15 meeting is something that you have pieced together; it
16 wasn't overtly stated in the meeting?
17 A. No, it wasn't overtly stated. The time frame seemed
18 to fit with Amanda's departure. She did clean her desk.
19 I assumed it was about Amanda. I eventually came to the
20 conclusion it wasn't me specifically, because I never throw
21 anything out. My desk is a bit like a turkey's nest, so
22 it's been described. So I realised it wasn't me and that
23 this was a fishing expedition to try to find some
24 information.
25
26 THE COMMISSIONER: Q. I take it, since you don't say
27 anything more about it in your statement, that that was it;
28 nothing emerged out of it - no culmination?
29 A. No, after feeling so fearful, counselling, legal
30 suggestions, nothing came out of it.
31
32 MS REECE: Q. You speak in your statement of some
33 surveys which had been conducted in your workplace. One is
34 called the Working for Queensland survey?
35 A. Yes.
36
37 Q. That's a general survey sent to employees of
38 Queensland Health?
39 A. Yes.
40
41 Q. You also talk about a forensic DNA workplace harmony
42 survey, and that's specifically for your own workplace, the
43 DNA Analysis Unit?
44 A. That was one that Lara Keller put to us, yes.
45
46 Q. When the Working for Queensland survey was carried out
47 in 2020, you have attached a copy of an email chain where

1 there is a discussion between Kylie Rika and Cathie Allen
2 as to the approach that might be taken to a workshop
3 discussing the results of that survey?

4 A. Yes.

5
6 Q. Because you have contributed to that survey before,
7 haven't you?

8 A. I have on occasions, yes.

9
10 Q. These are some of the ways in which you have raised
11 your concerns about your workplace?

12 A. Yes, yes.

13
14 Q. You refer to Ms Rika putting forward to Cathie that:

15
16 *... perhaps "as a whole Forensic DNA*
17 *Analysis team we could list the top 5 areas*
18 *we want action on and then have*
19 *a workshop".*

20
21 A. That's right, yes.

22
23 Q. And Cathie's response to that proposal was:

24
25 *From my perspective, I don't think Forensic*
26 *DNA Analysis is mature enough in our*
27 *journey to undertake the exercise that*
28 *you've proposed. ... staff could suggest*
29 *action items that they could do to improve*
30 *the workplace, other than around Managers.*

31
32 A. Yes.

33
34 Q. How do you feel about that response in relation to
35 efforts to improve the culture in your workplace?

36 A. Well, she's talking about a group that - 60-plus
37 personnel. I take it that she probably thought we were all
38 immature. I don't know. She already had preconceived
39 ideas about personnel and a lack of willingness on her part
40 to adopt strategies that Kylie had put forward. I found it
41 quite distressing.

42
43 Q. That final comment:

44
45 *... staff could suggest action items that*
46 *they could do to improve the workplace,*
47 *other than around Managers.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

How did you understand that comment?

A. My understanding was: you can suggest anything you want, but just don't suggest it if it involves managers. That's how I took it.

Q. Whilst John Doherty was the executive director, you met with him to discuss workplace issues?

A. Yes, I did.

Q. And, again, when Lara Keller became the acting executive director, you have given evidence that you approached her in March of this year --

A. Yes.

Q. -- about the DIFP concerns, and she sent out this workplace harmony survey in April of this year?

A. Yes.

Q. You have exhibited her email where she talks of the hope that there may be an improvement in workplace culture --

A. Yes.

Q. -- if the process is engaged in. You have exhibited that to your statement. Again, when you respond to that survey, you mention scientific issues which have occurred in the laboratory?

A. Yes.

Q. One is what you we have been referring to as the sperm microscopy issue?

A. Which we have discussed, yes.

Q. And the other the DIFP process?

A. Yes.

Q. So, again, you are using an avenue to raise your concerns about that issue?

A. That's correct.

Q. To be clear, Dr Moeller, when you raise the issue of sperm microscopy, you are raising it in a historical sense?

A. Yes.

Q. And it's really about it's an example of what you see is wrong with the lab?

- 1 A. Yes, it's an example of inaction.
2
- 3 Q. You have exhibited to your statement some text which
4 you inserted into the free text section of that survey?
5 A. Yes.
6
- 7 Q. As far as you know, there hasn't been any result or
8 outcome for this survey, which I suggest is probably
9 unsurprising given what's happening in the workplace at the
10 moment?
11 A. Given the Commission, yes, yes.
12
- 13 Q. But you again felt the need to develop these themes in
14 your response to the workplace harmony survey?
15 A. Yes.
16
- 17 Q. The Commission of Inquiry obviously occurred not long
18 after that survey, or it was announced that it would
19 commence. When you heard there was going to be
20 a commission of inquiry, what was your response? How did
21 you respond to that news?
22 A. My response was, maybe something will happen now.
23 I was hopeful. Maybe someone would actually hear us.
24 Maybe we would actually get looked into properly. Maybe
25 some of our concerns would get addressed or, at the very
26 least, investigated. So I was pretty happy about it.
27
- 28 Q. You approached the Commission confidentially?
29 A. Yes, I did.
30
- 31 Q. And why did you take that step?
32 A. Well, for the reasons I've already pointed out, about
33 feeling that bringing things up has a potential to cause
34 issues. I mean, Amanda Reeves' situation is a classic
35 example. I felt like I needed to do it away from the
36 department.
37
- 38 Q. You also said in your statement that you thought the
39 Commission would only be spoken to by certain members of
40 management --
41 A. Yes.
42
- 43 Q. -- or certain members of the staff and wouldn't get
44 the full picture?
45 A. That's right.
46
- 47 Q. You say you tried to raise issues before?

1 A. In - well, yes, with - I've raised issues, obviously,
2 yes.
3
4 Q. And you felt like nothing has happened?
5 A. No, no.
6
7 Q. And you felt, surely, sometime, someone had to listen
8 this time?
9 A. Eventually, that was the hope, yes.
10
11 Q. You say in your statement that you came forward to
12 speak to this Commission confidentially because you didn't
13 feel it was safe to speak out in your workplace --
14 A. That's right.
15
16 Q. -- and feared backlash?
17 A. That's right.
18
19 Q. Why have you taken the step of speaking publicly in
20 the way that you are doing now?
21 A. As uncomfortable as it is, the community deserves
22 better.
23
24 MS REECE: That Dr Moeller's evidence-in-chief. I wonder
25 if we might have a break.
26
27 THE COMMISSIONER: Yes. Let's adjourn until quarter
28 to 12.
29
30 **SHORT ADJOURNMENT**
31
32 THE COMMISSIONER: Yes, Mr Hunter.
33
34 **<EXAMINATION BY MR HUNTER:**
35
36 MR HUNTER: Q. Dr Moeller, can I ask you about the
37 difficulties you encountered when you attempted to raise
38 matters above the level of Ms Allen?
39 A. Yes.
40
41 Q. I should make it clear to you, I act for the
42 Queensland Police Service.
43 A. Yes.
44
45 Q. Was one of the problems with escalating matters above
46 Ms Allen the fact that you were talking about extremely
47 technical scientific matters?

1 A. That's definitely a possibility, yes.
2
3 Q. And that you were talking about these technical
4 matters to people who didn't have qualifications in that
5 area?
6 A. I don't believe they did have relevant qualifications.
7
8 Q. And so if it was necessary for them to be further
9 informed about it, they would have to go back, really, to
10 the people you were complaining about?
11 A. Yes.
12
13 Q. Can I ask you then about the micro-concentration of
14 what I will call low quant samples or samples in the DIFP
15 range?
16 A. Yes.
17
18 Q. You know what I'm talking about?
19 A. Yes, I do.
20
21 Q. Prior to early 2018, those samples were automatically
22 micro-concentrated?
23 A. Yes.
24
25 Q. That had been going on for quite some years?
26 A. I believe so, yes.
27
28 Q. There was a standard operating procedure for doing
29 that?
30 A. I believe so, yes.
31
32 Q. And this was something that was well understood
33 throughout the lab, that that was how these low quant
34 samples were processed?
35 A. Yes.
36
37 Q. So the standard operating procedure - have I called it
38 by the right name?
39 A. Yes, a SOP, standard operating procedure, yes.
40
41 Q. A SOP?
42 A. Yes.
43
44 Q. The SOP for the micro-concentration of these low quant
45 samples was something that had to be approved by
46 management?
47 A. Look, that's probably out of my area. I wouldn't want

1 to comment on that. That's out of my area.

2
3 Q. I suppose what I'm getting at is would people in
4 position of Ms Allen and Mr Howes have had any input to
5 a SOP such as the one that involved the automatic
6 micro-concentration of low quant samples?

7 A. Look, I actually can't tell you that. I don't know.
8 They ordinarily do. Whether they had input on that one,
9 I actually don't know.

10
11 Q. Was there, prior to 2018, a SOP, as you call it, for
12 simply amping these low quant samples without
13 micro-concentrating them?

14 A. Not that I'm aware of, no.

15
16 Q. So when you became aware of the decision on 6 June
17 this year that those low quant samples were to be amped
18 without micro-concentration --

19 A. Yes.

20
21 Q. -- that process bore no relationship to anything that
22 you had ever seen at the lab before in terms of how those
23 samples were dealt with?

24 A. No. It came as a surprise to a lot of us. It was not
25 something we would do with those samples, generally
26 speaking.

27
28 Q. It made no scientific sense to you?

29 A. No. If you have a low quant sample, the process had
30 always been to concentrate it. Why would you sub-optimally
31 work that sample?

32
33 Q. All you would be doing is wasting sample?

34 A. Possibly. I mean, it's possible you may have been
35 able to get a profile. But from my experience, I would
36 have microconned the samples.

37
38 Q. Is one of the issues with that procedure from 6 June
39 that the police would lose visibility of the fact that this
40 was a low quant sample and hadn't been micro-concentrated?

41 A. Well, that was what I thought could be a possibility.
42 QPS had been aware of the DIFP samples because that
43 information was transferred to them through the forensic
44 register as a DIFP. So if they wanted to rework it, they
45 could then ask for a rework. However, now, those samples
46 in that range were going through 15 microlitres. They
47 would get now - now they were coming on to the reporter's

1 case management list. They would get some sort of profile
2 result, or a result registered against them, whether it was
3 unsuitable or complex, or a profile. So now there would be
4 something registered against those samples, but those
5 samples had not necessarily - well, they, in the first
6 instance, hadn't been microconned, so the police wouldn't
7 be aware of that.

8
9 Q. There would be nothing on the forensic-register or
10 nothing being transmitted to the police that showed them
11 that this sub-optimal result - let's talk about
12 a sub-optimal result --

13 A. Yes.

14
15 Q. -- was potentially because the sample hadn't been
16 micro-concentrated?

17 A. I believe they would not have been aware of that.

18
19 Q. And so there wouldn't be an opportunity for them to
20 ask for the sample to be retested with micro-concentration?

21 A. I mean, I guess they still could do that, but - well,
22 they wouldn't have been aware that a microcon hadn't been
23 done.

24
25 Q. Whereas at least under DIFP, they were at least told
26 that?

27 A. Yes, yes.

28
29 Q. Lastly, can I ask about micro-concentration to full?

30 A. Yes.

31
32 Q. That's something that has been done at the laboratory
33 for years?

34 A. Yes, yes.

35
36 Q. And there is a SOP for that?

37 A. I don't know. It's just something I've been doing for
38 years.

39
40 Q. Is it a binary choice between micro-concentrating to
41 35 or 15, or is it possible for a scientist to say, "I'd
42 like this micro-concentrated to some figure in between
43 that"?

44 A. Look, over the years, it's sort of - they're the sort
45 of current standard values that we sort of microcon to.
46 It's changed over the years. It used to be to 50 - you
47 know. But at this point in time, you either say microcon

1 to 35 or you microcon to full. Now, that would be anything
2 under 15 microlitres. So they're the two sort of areas
3 that you work with.
4

5 Q. So when you say "microcon to full", it doesn't
6 necessarily mean 15; it could mean less than that?

7 A. Well, the amplification - when you do an amplification
8 of DNA, 15 microlitres is the figure we go for. So when
9 you say "to full", it will be anything within that
10 15 microlitres, and then, it's getting a little bit
11 technical, but you make it up to 15 with buffer. So it's
12 somewhere - 15 and below is considered microcon to full.
13

14 Q. But it's not the case that, for example, the idea that
15 the lab would microcon to full is some novel approach --

16 A. No, not --
17

18 Q. -- that needs to be investigated before it's employed?

19 A. Look, currently there is a project - right at this
20 moment, the laboratory is wanting to look at the efficacy
21 of doing to 35 and to 15, just so we have more information
22 around it. But certainly it's not novel. I guess they
23 want some figures to see how more effective or useful to
24 15 is.
25

26 Q. Just on that topic of microconning to full, am I right
27 that the police had never, as far as you know, raised any
28 concern about a scientist microconning to full and thereby
29 exhausting the sample?

30 A. I have never heard of that before.
31

32 MR HUNTER: Thank you.
33

34 THE COMMISSIONER: Thank you. Mr Rice?
35

36 **<EXAMINATION BY MR RICE:**
37

38 MR RICE: Q. Can I ask you for a bit of clarification on
39 a similar subject to what you have just been speaking
40 about. Perhaps if we could go to your statement at page 2,
41 paragraphs 10 to 12. That's where you deal with this
42 subject of micro-concentration, and you express your view,
43 in paragraph 11, that in certain situations, concentrating
44 to the fullest increases the chances, et cetera. We
45 understand that reasoning. But you go on to say in
46 paragraph 12:
47

1 ... there is currently no consensus on
2 which approach to use.

3
4 You are referring there to the difference between
5 micro-concentrating to 35, on the one hand, and
6 micro-concentrating to full, on the other?

7 A. Look, some scientists like to concentrate to 35
8 because then they can do two amplifications, and that, they
9 feel, gives them some confidence in profile interpretation.
10 However, when you actually concentrate it to a certain
11 level and it's not a good profile, in my opinion, a second
12 amplification gives you two - I'll use the word - crappy
13 profiles. For me, I will sometimes do it to 35, depending
14 on what the quant is, but that's more quant based. So we
15 do have some variability about processing and what people
16 feel the profiling, subsequent profiles, will give them in
17 doing an interpretation. Does that make sense?

18
19 Q. Well, I'm not really looking to try to resolve --

20 A. No, no, no.

21

22 Q. -- who is right and who is not.

23 A. Yes.

24

25 Q. I'm only interested to understand is there, in fact,
26 a lack of consensus amongst the reporting scientists as to
27 whether and when to apply either of these processes?

28 A. I feel there is a lack of consensus and I feel there
29 should be more around that from our team leader.

30

31 Q. So that we understand what a different point of view
32 might be, reflecting that lack of consensus, I think you
33 have said some scientists prefer an approach where they are
34 able to amplify twice; did I understand correctly?

35 A. Yes, yes.

36

37 Q. Is that the reason why they would not take the
38 approach that you might of micro-concentrating to full?

39 A. I have heard that, yes.

40

41 Q. Is there any other reason you have heard? I'm just
42 interested to understand what the other reasons might be.

43 A. That - I can't think of another reason, but that's
44 a recent interaction I've had with someone.

45

46 Q. When you say in paragraph 12 "there is currently no
47 consensus on which approach to use", would it be right to

1 say that you don't mean to convey that that lack of
2 consensus is only something of recent origin?

3 A. No, it's not recent.

4
5 Q. It has probably been going on for some time, maybe
6 even years; would that be right?

7 A. Look, it's possible. I mean, there are quite a few
8 factors that come into that.

9
10 Q. There's a lot to weigh up, isn't there?

11 A. There's a lot to weigh up. There's our statistical
12 programming, our new equipment, so there's a lot of things
13 that have come into play which could impact on how we
14 interpret profiles and how much confidence we've got in the
15 peaks we see at certain levels. So there's a lot of
16 information to take into consideration, yes.

17
18 Q. You mentioned that in the past, it hadn't been an
19 issue with exhausting a sample and that hadn't been
20 a concern expressed from QPS. Do I understand that
21 correctly?

22 A. I've never heard that before.

23
24 Q. In terms of the matters to weigh up, if of more recent
25 times police were concerned about the prospect of their
26 sample being exhausted, that would go into the mix of
27 factors you would need to consider, would it not?

28 A. Yes.

29
30 Q. Not only is there a lack of consensus, as you describe
31 it; there isn't - correct me if I'm wrong - any SOP or
32 guideline presently in existence to inform the scientists
33 as to whether to micro-concentrate and, if so, to what
34 level?

35 A. As I've already mentioned, no, I'm not aware.

36
37 Q. You have made mention of a current project. Is that
38 directed towards answering some of these questions and
39 better informing the scientists as to the performance of
40 this kind of process?

41 A. Yes, that's my understanding.

42
43 Q. I take it you would regard that as beneficial, that
44 there be some clearer guidance as to what factors would
45 guide you towards a particular procedure?

46 A. Look, yes, I do think - I do think it's beneficial,
47 yes.

1
2 Q. Just one other thing. When you were being questioned
3 by Ms Reece, you touched upon the idea of taking
4 a strategic approach, through case management, to the
5 examination and processing of samples. You mentioned in
6 the course of that, as I noted it, that you saw merit in
7 a scientist having ownership of larger cases?

8 A. Yes.

9
10 Q. What's the merit?

11 A. I'll give you a recent example, if you'd like. I was
12 looking at a particular sample of a case. I noticed -
13 well, it's not recent, it was last year, and the
14 significance of that will become apparent in a minute. At
15 the end of last year, I noticed a particular anomaly in a
16 profile. It was possibly due to some sort of bacterial -
17 some sort of issue, and I wanted to make sure that that
18 anomaly hadn't been confused as a proper peak in another
19 sample, and I wanted to also confirm that it - well, lend
20 support to the fact that it could have been an anomaly by
21 looking at other samples.

22
23 So I took it upon myself to actually look at the whole
24 case and look to see whether this particular anomaly had
25 been taken into consideration, whether it was still
26 appearing, what the factors were behind why it's appearing
27 here perhaps and not appearing in another sample. That's
28 when I came across the DIFP samples that hadn't been
29 profiled. So that's the significance of having a whole
30 case and seeing things that probably should have been
31 profiled or not.

32
33 But, yes, the whole case situation has its benefits to
34 making sure that the case is being assessed consistently
35 and correctly.

36
37 Q. You mentioned the merit that you have described as
38 being applicable to the larger cases?

39 A. Yes.

40
41 Q. Does that same merit extend to small cases to the same
42 degree, or --

43 A. Well, there are fewer samples. I don't know.
44 Possibly, but it's certainly a bigger - having an overview
45 of a lot of samples with a big case obviously, in my mind,
46 is more beneficial. Is it relevant to a smaller case?
47 I don't know. Possibly. If you see - if there were three

1 samples or four samples in a case, which is considered
2 small, and there was an issue in one, an anomaly in one,
3 seeing that already and then seeing it in another sample is
4 beneficial, yes. So it could be beneficial for a small
5 case.
6

7 Q. Is this something that you have thought about over the
8 years, about the optimal style of approach, or is it
9 something you have been asked to think about in more recent
10 times, for example since the Commission has been
11 established?

12 A. Oh, it's been raised for many years, that - and, like
13 I said, we used to have ownership of cases, but then it was
14 thought - I guess it was a streamlining process of just
15 doing lists, list work.
16

17 Q. Is that as you recall the change which we think
18 occurred about 2008?

19 A. Look, that's my recollection of why we moved away from
20 larger - we still do get some ownership of large cases,
21 particularly P1s, but it's not as frequent, certainly, as
22 it used to be, and I think it would be a good approach.
23

24 Q. To do more of it?

25 A. Yes, yes.
26

27 MR RICE: Thank you. Thanks, Commissioner.
28

29 THE COMMISSIONER: Q. Dr Moeller, you were asked about
30 the lack of consensus about the volume to which a sample
31 should be micro-concentrated.

32 A. Yes.
33

34 Q. To your knowledge, does anybody hold a view that all
35 samples should always be micro-concentrated to a particular
36 level, whether it's 15 or 30 or any other level?

37 A. I don't think that's a view that's held. If you have
38 a sample at the higher end of that DIFP range, then it's
39 not inconceivable to think that maybe a milder
40 concentration to 35 is more appropriate than a 15, a full
41 concentration. So, no, I don't believe people think you
42 should do one all the time, as opposed to the other
43 concentration.
44

45 THE COMMISSIONER: Thank you. Mr Diehm?
46

47 MR DIEHM: No questions, thank you.

1
2 THE COMMISSIONER: Ms Cooper?
3
4 MS COOPER: No questions, thank you.
5
6 THE COMMISSIONER: Mr Hickey?
7
8 <EXAMINATION BY MR HICKEY:
9
10 MR HICKEY: Q. Dr Moeller, first could I ask, is that
11 the correct pronunciation of your surname?
12 A. That's how it's pronounced in Australia. If you were
13 in Germany --
14
15 Q. I'm sorry, it's not a trick question, but that's why
16 I asked, in fact.
17 A. If you would like the German version, it's "Moeller".
18
19 Q. Is that how you pronounce it?
20 A. But, no, that's fine.
21
22 Q. How do you pronounce it?
23 A. Moeller is fine.
24
25 Q. Perfect, thank you. I didn't want to say the wrong
26 thing all morning. There's nothing worse.
27 A. No, no, that's fine.
28
29 Q. Could I ask you, please, to start, to go to
30 paragraph 44 of your statement. Oh, and I should say,
31 I appear for Cathie Allen and Justin Howes.
32 A. Yes.
33
34 Q. Here, we are dealing with the evidence that you have
35 given about the sperm microscopy issues?
36 A. Yes.
37
38 Q. The Commissioner asked you some questions during the
39 course of this part of the evidence in an attempt to
40 understand the chronology, and so I want to ask you some
41 questions about that just so that I understand the
42 chronology too. In paragraph 44, you give some evidence
43 that in 2015, some case scientists suspected that there was
44 a problem?
45 A. That's my understanding, yes.
46
47 Q. Then in paragraph 45, you tell us about some further

1 observations that were made; is that right?
 2 A. Yes.
 3
 4 Q. If we could just scroll down a little, please,
 5 Mr Operator, then you say in 47:
 6
 7 *The case scientists reported their initial*
 8 *observations to their line managers, who at*
 9 *the time were Amanda Reeves and Kylie Rika.*
 10
 11 A. Yes.
 12
 13 Q. When is it that you say they did that?
 14 A. I don't have a date on that because I don't know.
 15
 16 Q. You don't know?
 17 A. No.
 18
 19 Q. Could it have been closer to June 9, 2016 than 2015
 20 when the initial observations were made?
 21 A. Like I said, I don't know, I'm sorry.
 22
 23 Q. But it's possible, you would accept?
 24 A. It's a possibility. I don't know.
 25
 26 Q. You say there that:
 27
 28 *Amanda and Kylie were quite alarmed that*
 29 *this was happening and escalated the matter*
 30 *to other managers.*
 31
 32 Can I ask you, do you know when they escalated the matter?
 33 A. I think as soon as they were alarmed.
 34
 35 Q. How do you know that?
 36 A. I don't know that specifically, but that's - I know
 37 Amanda and Kylie are - well, Kylie still is - they were
 38 both very proactive when there were issues raised.
 39
 40 Q. So am I right then to say it is an assumption that you
 41 make, but you don't know for sure?
 42 A. Yes, no, I don't know for sure.
 43
 44 Q. Thank you. Could I ask you, then - you gave some
 45 evidence about what you described as the "FRIT fuckers".
 46 Who are they?
 47 A. The forensic reporting intelligence team. It's

1 basically - well, I would say it was the reporters.

2

3 Q. Is it all of the reporters or is it limited to what's
4 described in the material as RT2?

5 A. I don't know. You'd have to - I don't know
6 specifically who that would relate to. It's - yes.

7

8 Q. Perhaps I have misunderstood the evidence. Are you in
9 a team that's given some numerical identification among all
10 of the reporting teams?

11 A. Yes, reporting 2.

12

13 Q. So if I call that RT2 --

14 A. Yes.

15

16 Q. -- you will know what I mean?

17 A. Yes.

18

19 Q. Are the "FRIT fuckers" restricted to RT2 or do they
20 include members who are outside of RT2?

21 A. I don't know.

22

23 Q. But you've given evidence that you call yourselves
24 that.

25 A. Yes.

26

27 Q. Who, in your opinion, is included among that number?

28 A. Look, it's possible it's RT1 and RT2, because RT1 also
29 raises issues.

30

31 Q. No, but I'm asking you particularly.

32 A. Yes.

33

34 Q. When you deploy that term self-referentially - that
35 is, when you use it to describe "ourselves", which
36 I understood was the effect of your evidence --

37 A. Yes.

38

39 Q. -- who do you think that includes?

40 A. Who do I think that includes?

41

42 Q. Yes.

43 A. It could be RT2 and RT1.

44

45 Q. Have you ever spoken to a member of RT1 about their
46 being a member of the "FRIT fuckers"?

47 A. No. Oh, sorry, there is an RT1 team member, yes, and

1 he is aware of "FRIT fuckers".
2
3 Q. And who is that?
4 A. Rhys Parry.
5
6 Q. Who are the other members of RT2 with whom you have
7 discussed the "FRIT fuckers"?
8 A. Specifically, there would be a couple of members -
9 I mean, this has been going over a long period of time, so
10 it's possible all of the members, some of the members.
11
12 Q. Well, let me perhaps assist your memory. Kylie Rika
13 is the senior scientist of RT2; is that right?
14 A. That's correct.
15
16 Q. Have you discussed the "FRIT fuckers" with Kylie?
17 A. Yes, she knows about it.
18
19 Q. Allan McNevin is a member of RT2, isn't he?
20 A. He only became a member of RT2 this year. He was
21 a manager previously. I think it's this year.
22
23 Q. Have you discussed the "FRIT fuckers" with him?
24 A. No.
25
26 Q. Do you regard him as a "FRIT fucker"?
27 A. Well, that's not a term I've used. That's a term that
28 someone else has used. So --
29
30 Q. Who is the "someone else" that has used that term?
31 A. All right. That term we came up with amongst
32 ourselves. Have I - do I think Allan McNevin is a "FRIT
33 fucker"? Well, that's a term that's just been used amongst
34 some of us. So do I think he is? No.
35
36 Q. What about Angelina Keller? She's in RT2.
37 A. Yes.
38
39 Q. Is she a "FRIT fucker"?
40 A. Well, if you're talking - the terminology is not
41 literally, "You're a fucker" --
42
43 THE COMMISSIONER: What is this getting to, Mr Hickey?
44
45 MR HICKEY: What I'm trying to understand, Commissioner,
46 is whether there might in fact be a division within the lab
47 which is restricted to particular members of the lab team,

1 because as one looks at exhibit 4, there are two separate
2 reporting teams within the lab. Some of those, as
3 I understand it, we've heard evidence from, and some of
4 them we're likely to hear evidence from, but there are many
5 from whom we don't, as I understand it yet, appear to be
6 going to hear evidence from. So, what, in my submission,
7 ultimately the Commission will be interested to understand
8 is whether the tenor of the evidence that we have received
9 over time comes from a particular cohort of people who have
10 particular reasons for planting and reaping disharmony
11 within the overarching laboratory --
12

13 THE COMMISSIONER: Who have particular reasons for what?
14

15 MR HICKEY: For planting disharmony or sowing disharmony
16 within the team, and this line of inquiry is an attempt to
17 identify who may be among that number.
18

19 THE COMMISSIONER: Undoubtedly, there are the people who
20 have given evidence and who will give evidence who have
21 come forward with their particular complaints, like
22 Dr Moeller, who fall within the category of people who are
23 agitating, but is it your desire to identify everybody who
24 falls within a group who has the same attitude?
25

26 MR HICKEY: What I'm attempting to understand is whether
27 the views that are being expressed by these individuals,
28 which repeatedly are suggested to be reflective of some
29 broader cultural disharmony within the group, are indeed
30 truly reflective of some broader disharmony within the
31 group. The difficulty, as the Commissioner would
32 understand, is that those who instruct me have some
33 practical impediments to --
34

35 THE COMMISSIONER: I understand. I understand. But
36 undoubtedly among the group of scientists who are the
37 reporters, we know from the evidence we have heard that at
38 least those who have given evidence share that outlook and
39 they say that there are others. They don't say everybody.
40 I don't think any witness has said every reporter shares
41 these views. So we know that there are some who share that
42 view, and undoubtedly, I would think, I would just infer,
43 there are some who don't, and there may be some who do, but
44 we don't know who they are. I don't know that anybody
45 has - I don't understand the evidence to imply that every
46 reporter shares Dr Moeller's views about management.
47

1 MR HICKEY: No, and, with respect, Commissioner, that's
2 the difficulty, because the nature of the evidence has been
3 so ephemeral that it's difficult to discern with any real
4 precision just how many of the rest of the team it is
5 suggested --

6
7 THE COMMISSIONER: That's true. Nor can I. So we have
8 however many reporters there are. The only thing I know is
9 that the ones who have given evidence feel the way they
10 have described, and to the extent that they say there are
11 others, well, I will take into account that the ones who
12 have given feel that way, or the ones about whom there is
13 some evidence elsewhere that they have expressed those
14 views.

15
16 MR HICKEY: Yes.

17
18 THE COMMISSIONER: But I wouldn't conclude, on the
19 evidence as I understand it to be so far or the evidence
20 that's coming, that they all feel that way.

21
22 MR HICKEY: That's reassuring. Thank you, Commissioner.

23
24 THE COMMISSIONER: I'm sure - I mean, I don't want to go
25 into detail at the moment because it is premature, but I'm
26 confident that there are people who don't feel that way --

27
28 MR HICKEY: Thank you, Commissioner.

29
30 THE COMMISSIONER: -- or might have other gripes but not
31 these. So if your intent is to demonstrate that not
32 everybody feels that way, I don't think everybody feels
33 that way.

34
35 MR HICKEY: I will move on.

36
37 THE COMMISSIONER: If that assists.

38
39 MR HICKEY: It does, thank you.

40
41 Q. Now, Dr Moeller, you gave some evidence to the effect
42 that you were scared of Ms Allen?

43 A. Yes.

44
45 Q. In particular, you said that you've had phone calls
46 with Cathie that were "aggressive and not great". In order
47 that Ms Allen can respond to that allegation, it's

1 important that we understand what you say those consisted
2 of. So can I ask you, please, for some further information
3 about that. How many of these phone calls do you recall
4 were there?

5 A. I don't keep a tally of the number of phone calls.

6
7 Q. So it's just a general recollection, is it?

8 A. Yes.

9
10 Q. When, in particular, do you say the phone calls
11 happened?

12 A. I don't keep a tally - I don't keep documented
13 information like that, either.

14
15 Q. Do you have any recollection at all of the issues that
16 were discussed in an aggressive manner?

17 A. No.

18
19 Q. Can you give us any explanation of how the aggression
20 manifested itself?

21 A. Cathie has a tendency to be quite abrupt, actually,
22 quite terse. I have seen it in meetings and I have
23 experienced it in phone calls. I have seen her do it to
24 other staff members.

25
26 Q. I'm sorry to interrupt you, but for now, to be
27 absolutely clear, I'm confining my question to phone calls
28 that I presume you have participated in. Is that what you
29 mean?

30 A. I have participated in some phone calls, yes.
31 I don't - when I get a - it doesn't happen very often when
32 I do get a phone call from Cathie, but I basically feel
33 like I have to brace myself, because I feel more often than
34 not there will be an opportunity or an avenue for her to be
35 terse.

36
37 Q. It's the case, isn't it, that you don't speak to
38 Cathie Allen on the phone very frequently at all?

39 A. I don't anymore, no.

40
41 Q. In fact, in your day-to-day operations until, say, the
42 Commission commenced and was announced, you don't typically
43 have all that much to do with Cathie at all, do you?

44 A. No. That has - probably had a lot more, not personal
45 interaction but interactions with her as a group when we
46 used to have management - not management meetings, staff
47 meetings. They seem to have disappeared over the years,

1 but I saw a lot of her behaviour in those meetings, yes.

2
3 Q. Have you ever brought directly to Ms Allen's attention
4 your perception that she is terse?

5 A. From my perspective, it's very difficult to approach
6 a bully about their bullying behaviour. So, no, I haven't.

7
8 Q. So you would agree with me, then, you have not given
9 Cathie any opportunity to modify her behaviour in
10 circumstances where you have never explained to her that
11 something about her conduct was making you feel
12 a particular way?

13 A. I've had to go above her to EDs to talk about her
14 behaviour because I've felt uncomfortable talking to her
15 directly, so I have actually broached the issue with people
16 above her about her behaviour.

17
18 Q. I know that because you gave that evidence before.

19 A. Yes.

20
21 Q. But, again, my question is, you have not directly, by
22 speaking to Cathie Allen, given her the opportunity to
23 understand how you feel about her conduct and to modify it
24 in some way?

25 A. I don't feel it's a comfortable situation for me
26 because of past interactions.

27
28 Q. Is your answer, then, to my question "no"?

29 A. No, I haven't - I haven't talked to her directly.

30
31 Q. You would agree, wouldn't you, that if you had done
32 that, that might have led to her understanding quite
33 clearly your concerns, rather than them being communicated
34 to her via the Chinese whispers of a third party?

35
36 THE COMMISSIONER: What Chinese whispers of a third party?

37
38 MR HICKEY: I will go back a step.

39
40 Q. At best, you have communicated your concerns to
41 somebody superior to her?

42 A. Yes.

43
44 Q. And you have assumed that whoever that is that you
45 have communicated with has communicated your concerns to
46 Cathie?

47 A. I have assumed that her behaviour has possibly been

1 addressed, not necessarily from me, but through - not
2 specifically instigated by me, but I am aware that - I did
3 actually have a discussion with John Doherty, who's Lara's
4 predecessor, and we did talk about issues in the
5 laboratory, work issues. We did then talk about
6 personalities. Cathie's personality came up, and John
7 Doherty said in the session with me that he believed she
8 could be rehabilitated.

9
10 Q. Yes, you give that evidence in your statement.

11 A. Yes.

12
13 Q. But to go back to my question, I take it you assumed -
14 and can I be plain about this, I think it's a reasonable
15 assumption - that if you communicated that to Mr Doherty,
16 he would pass that on to Ms Allen; that was your
17 assumption?

18 A. Well, that would be my assumption.

19
20 Q. But he didn't in that meeting with you, did he - you
21 don't say in your statement that he said to you he had done
22 that?

23 A. Well, we had only just discussed it, so he didn't have
24 the opportunity to actually then go and talk to her. So
25 I didn't have a follow-up meeting with him.

26
27 Q. I understand. But at highest, your assumption is that
28 it had been communicated to Cathie?

29 A. That he - sorry, say that again?

30
31 Q. At its highest, you assumed somebody had communicated
32 with Cathie about these concerns of yours?

33 A. Yes.

34
35 Q. Could we go, please, to paragraph 19 of your
36 statement. Here you are talking about some observations
37 that you had made in respect of DIFP samples in
38 paragraph 18?

39 A. Yes.

40
41 Q. And that those were producing useable DNA profiles,
42 and in 19 you explain that you discussed your observations
43 and concerns with your line manager?

44 A. Yes.

45
46 Q. She was collecting some data, you say?

47 A. Yes.

1
2 Q. You say you added some of your samples to the
3 spreadsheet. Now, I want to ask you some questions about
4 the samples that you added to the spreadsheet. Can I ask
5 you, the samples that you added to the spreadsheet, were
6 they all outcomes of sampling - that is, useable and not
7 useable - or were they only useable DNA profiles that you
8 added to the spreadsheet?

9 A. I only put a selection in because - and I'll just
10 continue. I only put a selection in because they were
11 getting too numerous, so I actually stopped doing it.
12 I don't recall if I put in unusable results. The point of
13 the - I felt like it was important to convey that some of
14 these samples were giving profiles.

15
16 Q. But you don't intend to suggest that they were
17 statistically significant in circumstances where you may
18 not have been including unusable samples?

19 A. No-one was talking about any statistical proportions
20 at this point at all.

21
22 Q. Thank you. Could we go then, please, to paragraph 39
23 of your statement. What I'm interested to understand is
24 what you say in the third line of paragraph 39. You say:

25
26 *Apparently [Cathie] was dismissive and*
27 *appeared annoyed when questioned. I knew*
28 *this from my discussions with my*
29 *colleagues, who were also concerned about*
30 *the decision.*

31
32 Who were the colleagues with whom you had discussions?

33 A. I know it was brought up specifically by - or one
34 question was brought up by Alicia Quartermain, to convey
35 her wanting to understand what the decision was based on.
36 I have had subsequent conversations with people in my
37 working bay, for instance.

38
39 Q. Who are those people?

40 A. I'm fairly sure I talked to Claire Gallagher about it
41 and Deborah Nicoletti.

42
43 Q. Did any of those three that you have mentioned tell
44 you that on that occasion at which Cathie had walked around
45 the laboratory, she had spent something in the order of
46 two hours chatting with the reporting scientists in that
47 area about the issue?

1 A. I'm not aware of that.

2

3 Q. Would you agree with me that if she had done that,
4 that isn't the behaviour of somebody who is dismissive of
5 concerns?

6 A. I do think she is dismissive of my concerns, or our
7 concerns. I sent her an email asking about why the process
8 was implemented, and she didn't address it.

9

10 Q. All right. Could I go back to my question. Would you
11 agree with me that somebody who spends two hours in the
12 work area talking to people about this particular issue is
13 not somebody who is dismissive of those concerns?

14

15 THE COMMISSIONER: Q. Mr Hickey is asking you to assume
16 that that is true.

17 A. It depends what the answers were and whether she
18 actually addressed them. I wasn't there, so I don't know
19 if the two hours were specifically addressing the questions
20 or they were evasive.

21

22 MR HICKEY: Q. It's unusual, isn't it, for Ms Allen to
23 spend two hours chatting in the work area like that?

24 A. I very rarely see Ms Allen in our area.

25

26 Q. So the fact that she would spend two hours in the work
27 area, you'd agree, based on your experience, would tend to
28 indicate that she thought there was something important
29 that needed to be talked about?

30 A. I would assume so.

31

32 Q. Were you aware from your discussions with
33 Ms Quartermain that Ms Allen had had a lengthy conversation
34 with her alone in addition to the discussions she had had
35 with others generally on that day?

36 A. I can't talk to you about what Ms Quartermain had -
37 what discussions she had.

38

39 Q. So if you assume that's true, there are things that
40 Ms Quartermain may not have told you about what happened
41 during that period?

42 A. I haven't had an in-depth discussion, no.

43

44 Q. In paragraph 41 of your statement, you tell us that
45 Cathie had told you that Justin was going to speak to you
46 in relation to the 15 microlitre decision. Do you recall
47 being asked about that?

1 A. Yes.
2
3 Q. You tell us that since that time, Justin has not
4 broached the issue with you?
5 A. No.
6
7 Q. Were you aware that Mr Howes spoke to your line
8 manager, Ms Rika, about this issue?
9 A. Well, that may be or may not be, but Cathie said
10 Justin would address me, and he didn't.
11
12 Q. Did Ms Rika tell you that she had offered to Mr Howes
13 to speak to you about this issue?
14 A. I'm not aware of that.
15
16 Q. Did Ms Rika speak to you about the issue?
17 A. Ms Rika and I have been in a lot of contact about some
18 of these processes that we are finding problematic, so it
19 could have been covered off in one of those. Ms Rika is
20 very proactive in trying to keep everyone abreast and she
21 has continued to do that in the whole time I have worked
22 with her.
23
24 Q. Notwithstanding what Cathie had said, and I understand
25 that she told you that Mr Howes would speak to you about
26 it, it wouldn't be inappropriate, in your experience in the
27 lab and given the nature of this issue, for Ms Rika to
28 speak to you about it, would it?
29 A. I'm saying Ms Rika may very well have talked to me
30 about it. We have been constantly talking about some of
31 these processes we're having problems with.
32
33 Q. And certainly she spoke to you in relation to the
34 15 microlitre decision, didn't she?
35 A. The actual decision?
36
37 Q. Yes.
38 A. And who made it? No, because I'm not sure she's quite
39 aware of it, either.
40
41 Q. Well, when you say Cathie replied saying that Justin
42 would speak to you in relation to the 15 microlitre
43 decision, what was it that your expectation was that
44 Mr Howes would tell you about it?
45 A. I was - given that I thought scientifically it was an
46 unsound decision, but perhaps there was some other reason,
47 I was hoping to be enlightened.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. Did Ms Rika speak to you about the scientific reasons, satisfactory or otherwise, that underpinned the decision?

A. I believe there's no scientific decision that underpins the 15 microlitres. No-one is understanding why the 15 microlitres came into play. That's why I actually sent the email.

Q. Did Ms Rika speak to you about what the purported reasons for that decision were?

A. No.

Q. In paragraph 49 of your statement, you say that you understand that some staff - and you identify those as being Mr McNevin and Mr Ryan --

A. Yes.

Q. -- were not happy with the workaround as it's quite labour intensive. What was the source of your knowledge about their being unhappy about that process?

A. I had heard from other staff members that they were grumbling that all of the samples were going through to diff lysis.

Q. Would I be right in saying that the nature of the lab was such that the people below the level at which Kylie Rika sits were generally prone to grumble among themselves rather than talk to the person who actually had the problem?

A. No, I don't agree with that.

THE COMMISSIONER: The people below whom, Mr Hickey?

MR HICKEY: Ms Rika, so the workers within the reporting team.

THE COMMISSIONER: I understand, yes.

MR HICKEY: Q. In paragraph 54, you say:

It is my understanding that there was a recommendation by Amanda --

that's Ms Reeves --

to look at sexual assault samples prior to 2015 which has not been done.

1
2 What's the basis of your understanding about that?
3 A. We had a conversation about it.
4
5 Q. Who's "we"?
6 A. Amanda and I.
7
8 Q. When did you have that conversation?
9 A. Around that time. I can't give you a specific date.
10
11 Q. Have you spoken to Ms Reeves recently about these
12 events?
13 A. These specific events, no.
14
15 Q. The events that concern the Commission of Inquiry?
16 A. Specifically about what - that I'm giving evidence?
17 She knows I'm giving evidence.
18
19 Q. No, no. Have you spoken with Ms Reeves recently about
20 the issues, any of the issues, that you understand that the
21 Commission of Inquiry is investigating?
22 A. No.
23
24 Q. When was the last time you spoke to Ms Reeves?
25 A. The day before yesterday, I think.
26
27 Q. And did you speak to her about the fact that you were
28 giving evidence here today?
29 A. Well, she knows I'm - yes, she knows I'm giving
30 evidence.
31
32 Q. And did you share your statement with her before
33 you --
34 A. No, absolutely not.
35
36 Q. Did you refresh your memory about any of these events
37 by reference to discussions that you have had with
38 Ms Reeves recently?
39 A. No, no.
40
41 Q. Is she working presently?
42 A. Yes, she's in another Queensland Health department,
43 flourishing.
44
45 Q. Flourishing?
46 A. Yes, doing very well.
47

1 Q. Thank you, that's helpful to understand. Can
2 I suggest to you - and I imagine I know what your answer is
3 going to be, but in any event, I have to do this. Can
4 I suggest to you that Amanda did not, in fact, make
5 a recommendation to that effect prior to 2015?

6 A. You can suggest that. I don't know if that's true or
7 not.

8
9 Q. Now, can we move on, please, to paragraph 55. There
10 you say:

11
12 *The altercation between Amanda and Allan*
13 *and the aftermath was shocking.*
14

15 The altercation I presume you are talking about is the
16 event where Allan is variously described as having raised
17 his voice at Amanda and having slammed his hands on the
18 table; is that the one?

19 A. Yes.

20
21 Q. You yourself weren't present at the meeting?

22 A. No.

23
24 Q. Have you spoken to anybody other than Amanda about
25 what occurred at the meeting?

26
27 THE COMMISSIONER: Do you mean ever?

28
29 MR HICKEY: Yes.

30
31 THE WITNESS: Ever? Yes, Kylie Rika.

32
33 MR HICKEY: Q. Anybody else?

34 A. No.

35
36 Q. Why is that?

37 A. Well, the rest of them were managers, except for an
38 acting manager, I think at the time, Pierre Acedo. He
39 certainly was present, if any follow-up information is
40 required with what happened.

41
42 Q. You were content to rely upon Kylie and Amanda's
43 versions of events rather than triangulating that by
44 reference to anybody else's version of events?

45 A. Well, we've already discussed about causing unrest by
46 talking to other people. It wasn't my job to go and talk
47 to someone else and cause more unrest.

1
2 Q. But it was obviously something that you regarded as
3 shocking?
4 A. Because it was based on her emotional response to
5 afterwards, so it must have been shocking.
6
7 Q. Given the significance of that, then, wasn't it
8 important, in your view, to ensure that you had the correct
9 version of events?
10 A. I believe Amanda's - I don't see why Amanda's versions
11 wouldn't be correct. I don't think she's a liar.
12
13 Q. You weren't interested in verifying her version of
14 events with others?
15 A. With - I'm sorry, but with whom?
16
17 Q. Anyone other than Kylie.
18 A. Well, Kylie, I thought, was a good source of
19 information. She has a lot of integrity, and I trust her.
20
21 Q. But you didn't think it necessary to talk to anyone
22 else?
23 A. Well, this is the whole - the thing you raised earlier
24 about causing unrest with others. Why would I talk -
25 I don't do that. Why would I go and talk to someone else
26 and cause more disharmony and rebel-rousing? I don't do
27 that.
28
29 Q. Why did you talk to Kylie about it, then?
30 A. Because she was in the meeting as well and she's my
31 friend and she was upset as well.
32
33 Q. You say, in your view:
34
35 *... Amanda was treated poorly by Cathie and*
36 *Justin, to the point she was made to sit in*
37 *the library for approximately 8 months,*
38 *away from her colleagues.*
39
40 You've never spoken to Cathie or Justin about what their
41 version of these events might be?
42 A. No, I haven't talked to them about the events.
43
44 Q. You haven't had the benefit of knowing what their side
45 of all of these events might be?
46 A. No. I think we addressed earlier that I don't know
47 the specifics of what - how it came to be.

1
2 Q. And so, given that, do you accept that you have really
3 only had the benefit of what you observed occurred, which
4 is the movement of Ms Reeves to that room that you have
5 described?

6 A. I saw Ms Reeves move into a room and given a project,
7 her responsibilities taken away. That's a fact. She was
8 made to do a project that she didn't want to do. She was
9 taken off communication lists and there were never any
10 welfare checks done by her line managers, Justin or Cathie.

11
12 Q. All of that is something you only know because that's
13 what Amanda has told you; is that right?

14 A. I know she was taken off email chains, because I could
15 see she wasn't on the email chains. So I actually know
16 some of that information, yes.

17
18 Q. With the exception then of that point, those other
19 things you have just mentioned are things you only know
20 because that's what Amanda has told you?

21 A. I also know that she didn't have her - she did not
22 retain her management responsibilities. I know that as
23 well. So there are a couple of things that I know, apart
24 from what Amanda has told me.

25
26 THE COMMISSIONER: The only subjective matter that
27 Dr Moeller has referred to is that Amanda didn't want to do
28 the project, which depends upon Ms Reeves telling her that
29 she didn't want to do the project. Let's leave that aside.
30 But the other matters were all objective facts. She was
31 working in a room; she was not working where she used to
32 work; she was doing something else; she had been relieved
33 of her prior responsibilities. These aren't things that
34 depend upon believing somebody or not believing somebody.
35 The implications are different, and of course the reasons
36 for it all are matters of interest. But what are you
37 asking? These are objective facts. The woman was working
38 in a room, whereas previously she was working somewhere
39 else; she was working on a project, whereas previously she
40 did other things; and her name had or had not been removed
41 from the email list.

42
43 MR HICKEY: The difficulty, Commissioner, is that if the
44 evidence was put as simply and discreetly as that, I would
45 have no reason to ask these questions.

46
47 THE COMMISSIONER: But it's also put that that was

1 retribution. That's an inference, a view, a perspective,
2 and of course that's a matter of exploration and might be
3 completely wrong.

4
5 MR HICKEY: That's really what I am attempting to explore.

6
7 THE COMMISSIONER: But you're asking, "You only know these
8 things because Amanda told you", but what Dr Moeller is
9 saying is that the objective things are things she knows.
10 The retribution aspect - well, that's a whole different
11 thing. Is that what you are interested in, that her belief
12 that it had that character is something that she gleaned
13 from her relationship and communications with her friend?

14
15 MR HICKEY: Yes.

16
17 THE COMMISSIONER: I understand. Sorry, if that's what
18 you are interested in, then please go ahead.

19
20 MR HICKEY: Q. You made those observations of what was
21 occurring to Ms Reeves?

22 A. Yes.

23
24 Q. You relied upon things that Ms Reeves told you and
25 your own impression of the circumstances to form the view
26 that she was receiving some form of retribution at the
27 hands of Justin and/or Cathie?

28 A. Ms Reeves was quite distressed. Ms Reeves has, in my
29 opinion, a lot of integrity and honesty. She conveyed
30 those - her hurt and upset to me, and through my own
31 observations, I came to that conclusion.

32
33 Q. Your evidence is not that Ms Reeves suggested, for
34 example, that she had been told by anybody that the reason
35 she had been deployed in that way was as some sort of
36 retribution for her interest in scientific matters?

37 A. I don't know if she was told that specifically, but
38 that's an inference I made myself.

39
40 Q. Did Ms Reeves ever tell you that members of the human
41 resources team beyond the lab itself were involved in
42 managing her situation?

43 A. I'm not aware of any specific human resource issues
44 and what they entailed.

45
46 Q. In paragraph 58 of the statement, here you are talking
47 about Operation Golf Alcove, the events surrounding that?

1 A. Yes, mmm-hmm.
2
3 Q. You say there that you were still fairly new to the
4 reporting team?
5 A. Yes.
6
7 Q. It wasn't the case, though, that at that time you were
8 a new reporting scientist?
9 A. I had been working in evidence recovery and the intel
10 section. There's a period of time where people - before
11 they actually become a reporter, they actually do a lot of
12 case management and then eventually get signed off as
13 a reporter. So I don't know the sequence of events or the
14 timeline around that, but I certainly felt like I was quite
15 new - the recollection I have now is that I was quite new
16 to a big case that was problematic.
17
18 Q. You were new to the team, but before joining the team,
19 you had been a member of the red team within major crime?
20 A. Whether I was a reporter or not I don't know, but
21 I was certainly doing case management.
22
23 Q. And you were reporting cases when Mr Howes started
24 working at FSS in 2005?
25 A. I don't know. I can't recall that. Like I said,
26 I don't know the time frames.
27
28 Q. When you began in the reporting team, you, at least
29 prior to coming into that team, represented yourself to be
30 an experienced reporting scientist?
31
32 THE COMMISSIONER: Sorry, I just missed the history.
33 Could you just repeat it for me, Mr Hickey?
34
35 MR HICKEY: Yes, Commissioner.
36
37 Q. Prior to coming into the reporting team, you presented
38 yourself, in order to come into that position, as an
39 experienced reporting scientist?
40 A. Oh, not - well, I wasn't experienced yet. I was
41 coming into a reporting team.
42
43 Q. But you presented, you represented by dint of your
44 experience and expertise, that you were an experienced
45 reporting scientist?
46
47 THE COMMISSIONER: But experience gained where?

1
2 MR HICKEY: Prior to coming into the team, from elsewhere,
3 are my instructions.
4

5 THE WITNESS: But from where? Sorry, I don't understand.
6

7 THE COMMISSIONER: Q. It's being put to you that you
8 said words to the effect that you've got experience in
9 reporting and you said that to - to support her bid to join
10 the team; is that --
11

12 MR HICKEY: Yes.
13

14 THE WITNESS: So before I've joined a reporting team for
15 the first time, I apparently said I had reporting
16 experience? Sorry, is that what you are saying?
17

18 MR HICKEY: Q. Yes.

19 A. Sorry, that doesn't make sense to me, because I hadn't
20 joined a reporting team yet.
21

22 Q. So the answer is no?

23 A. No.
24

25 Q. Thank you. In paragraph 73 of your statement, you say
26 that you:
27

28 *... have heard that Cathie has referred to*
29 *the case scientists as "those fuckers over*
30 *there".*
31

32 A. Yes.
33

34 Q. Who was it that you heard that from?

35 A. I've heard that from Emma Caunt.
36

37 Q. Did she say to you that Cathie had said that to her?

38 A. Cathie had said it - I think Emma was in the vicinity
39 when she said "those fuckers over there", and it was
40 because we were doing colour photocopying, and she doesn't
41 like it if we do colour photocopying.
42

43 Q. Who did Emma tell you Cathie had said that to?

44 A. I don't - she didn't tell me who it was, specific, but
45 she overheard it.
46

47 Q. In paragraph 74, you talk about a meeting that

1 occurred after Workplace Edge?
 2 A. Yes.
 3
 4 Q. You say the meeting was chaired by Paul Csoban and
 5 Cathie Allen?
 6 A. That's right.
 7
 8 Q. Might it have been in fact the case that the meeting
 9 was chaired by Mr Csoban and a fellow called Alan Holz from
 10 Workplace Edge?
 11 A. I have in my notes that Cathie Allen was there.
 12
 13 Q. She was certainly there, but might it have been the
 14 case that she didn't, in fact, chair the meeting?
 15 A. That's possible, but she certainly was there, yes.
 16
 17 Q. And she may have answered a question that was directed
 18 to her?
 19 A. It's possible.
 20
 21 Q. Were you aware that the feedback that was presented at
 22 that meeting had been formulated by Workplace Edge, the
 23 independent organisation, based on the interviews that they
 24 had held with staff?
 25 A. Yes, I am aware that that was the basis. I'm also
 26 aware that afterwards, a lot of staff - and I can't give
 27 you numbers - said that what was presented did not seem to
 28 be - reflect their views.
 29
 30 Q. And it was the case, wasn't it, that - well, let me
 31 ask it this way. I'm not sure I can recall your evidence
 32 about this. Did you personally participate in an interview
 33 with Workplace Edge?
 34 A. I probably did, yes. I don't recall, but possibly.
 35
 36 Q. It's not your recollection, though, that Cathie Allen
 37 was a participant in those meetings?
 38 A. I don't recall that, no.
 39
 40 Q. Were you aware that neither Ms Allen nor Mr Howes had
 41 any involvement in the preparation of the feedback that was
 42 presented at that meeting?
 43 A. Look, I don't know if they were involved in that.
 44 However, the feedback was quite brutal, and I would have
 45 thought for the wellbeing of the staff members, they could
 46 have been involved in tempering some of that, because it
 47 was quite brutal. As a responsibility to their staff

1 members, I would have thought they would have participated
2 in how it was conveyed.

3
4 Q. Was your view then, just so I can understand that
5 point, that if an independent external consultant had
6 assembled feedback which was particularly brutal but
7 nevertheless true, that should be watered down before being
8 presented to staff?

9 A. Well, I'm not - I'm not - I don't agree with the
10 "which was true" comment, I'm sorry.

11
12 Q. No, you're perfectly right to pull me up about that.
13 If I ask you to assume that whoever assembled that feedback
14 would give evidence in this Commission to the effect that
15 whatever was presented was a true reflection of the
16 interviews as they had been conducted, you don't intend to
17 suggest, do you, that the views assembled by an independent
18 consultant should have been watered down before being
19 presented to the staff?

20 A. Well, firstly, they obviously had interviews -
21 participated in interviews. I'm not sure I even agree with
22 the "that was the general view". That's a view that they
23 put forward. Whether that's an accurate reflection,
24 I don't necessarily agree. Does that answer your question?

25
26 Q. Not really, but let me try it this way.

27 A. Yes.

28
29 Q. You don't intend to suggest, do you, that the staff
30 are so delicate that they ought not be given frank feedback
31 which might be negative about their performance?

32 A. Oh, look, to be honest, I've never heard of a manager
33 say, "If you guys don't step up your act, we'll outsource
34 you" - I've never heard a manager say that or agree for
35 that to be conveyed to staff in a staff forum.

36
37 Q. It wasn't clear to me, from reading IM-11, who you
38 contend said that. I saw that you took a note of that, but
39 who is it you recall said that?

40 A. I don't know who - I don't have it in the notes who
41 actually said that.

42
43 MR HICKEY: Do you wish me to continue, Commissioner?
44 I will be --

45
46 THE COMMISSIONER: It depends how long.

47

1 MR HICKEY: I've got about half a dozen issues. I think
2 it will probably take 20 minutes or so.
3
4 THE COMMISSIONER: Twenty minutes?
5
6 MR HICKEY: Yes.
7
8 THE COMMISSIONER: Would you prefer to carry on?
9
10 THE WITNESS: Yes, we might as well continue.
11
12 THE COMMISSIONER: Are you comfortable?
13
14 MR HICKEY: I'm content to charge on. I didn't want to
15 hold others up.
16
17 THE COMMISSIONER: Thank you, Mr Hickey. And take your
18 time, Mr Hickey.
19
20 MR HICKEY: Q. In paragraph 81, you give some evidence
21 about that meeting that you had with Mr Doherty, and you've
22 already told me some things about that.
23 A. Yes.
24
25 Q. In particular, you say that you had seen repeated
26 behaviour. Can I suggest to you that the only conflict of
27 any significance that had ever occurred between you and
28 Ms Allen occurred in or about 2006 or 2007? Do you have
29 any recollection of events at that time?
30 A. I do have a recollection of where she yelled at me.
31
32 Q. It is the case, isn't it, that she apologised for her
33 actions?
34 A. That I don't recall.
35
36 Q. Well, to be clear, can I suggest to you that that's
37 what happened?
38 A. That's a possibility.
39
40 Q. And since that time, she has never repeated that kind
41 of behaviour with you?
42 A. Oh, she has been terse, which we've already discussed.
43
44 Q. But, sorry, she's never repeated that behaviour?
45 A. The yelling at me for doing what was part of my job
46 was - I'm assuming we're talking about the same event,
47 where she - I was telling her - I think she had a phone

1 call from QPS, something to that effect. I was doing my
2 job of telling her. I think these are the details. And
3 she - it wasn't just a slight annoyance with me; she was
4 very aggressive.

5
6 Q. And that's never happened again?

7 A. Not to that extent, no.
8

9 Q. In the 16 years since then, there has been nothing
10 even approaching that kind of behaviour by Ms Allen towards
11 you?

12 A. Well, the yelling at - well, I would have hoped not,
13 no, and it hasn't.
14

15 Q. That, you would agree, demonstrates that she made an
16 attempt to ameliorate her conduct in her relations with you
17 thereafter?

18 A. She's still very aggressive.
19

20 Q. Your "aggression", as I understand your evidence, is
21 her being terse; is that right?

22 A. Dismissive, terse, belittling, yes.
23

24 Q. Can you give me an example of where she has been
25 belittling?

26 A. I've seen her in meetings where someone has actually
27 suggested something, and she's basically - I think she
28 humiliated the person.
29

30 Q. When was that?

31 A. The date? I don't have a date.
32

33 Q. A year would do.

34 A. I don't have a year, either.
35

36 Q. Who was the person?

37 A. I have seen her belittle Allan McNevin.
38

39 Q. I will ask Mr McNevin about that. Now, can I ask you
40 some questions - I briefly touched upon it a moment ago -
41 about Operation Golf Alcove. Can we return to paragraph 66
42 of your statement. You have told us that Mr Howes said
43 something like, "For fuck's sake, I'll do it"?

44 A. Yes.
45

46 Q. Can I suggest to you, and to be absolutely clear about
47 it, there is no suggestion that that event didn't occur

1 generally, so I'm not intending to suggest that to you, but
2 the actual language used might have been slightly different
3 from what you have put there?

4 A. He swore at me.

5

6 Q. He certainly did swear at you?

7 A. Yes.

8

9 Q. But it might have been phrased somewhat differently to
10 that?

11 A. No, I'm pretty sure, "For fuck's sake, I'll do it",
12 but there was certainly swearing in there, yes.

13

14 Q. You say for many subsequent years he would bring up
15 Golf Alcove as a way, you felt, of belittling you?

16 A. Yes.

17

18 Q. Can I suggest you have never told Mr Howes that you
19 felt belittled on the occasions that that event has been
20 brought up?

21 A. It was done in front of other people, other staff
22 members. It was an awkward time to actually say, "Hey,
23 stop belittling me and humiliating me in front of other
24 people." So in those instances, no, but there did come
25 a point where I said, or made it very clear, that it was -
26 I didn't like it anymore.

27

28 Q. How did you make it very clear?

29 A. I think it was something to the effect of, "Are we
30 really doing this again?", something to that effect, but -
31 something to that effect.

32

33 Q. Can I suggest to you that Mr Howes, in fact, has no
34 idea that you felt belittled when that topic was mentioned?

35 A. Okay.

36

37 Q. Are you surprised by that?

38 A. Yes, I am.

39

40 Q. And can I suggest to you that he describes it this
41 way: "Since the episode, Ingrid and I have joked about how
42 I lost it and that it was the only time I've ever done
43 this." Now, pause there. It is the only time he had ever
44 done that, isn't it?

45 A. That he's lost it with me. But I have to go - with
46 what you have just said, I - he may have thought of it as
47 a joke. For me, this was a murder case, it was around

1 a murder case, where the laboratory had significant
2 contaminations. It --
3
4 Q. Can I just interrupt you --
5 A. No.
6
7 Q. To be clear --
8
9 THE COMMISSIONER: Let her finish, Mr Hickey. Then if the
10 question is unresponsive, you can go again.
11
12 MR HICKEY: I think we're at cross-purposes.
13
14 THE COMMISSIONER: Even so, Mr Hickey --
15
16 THE WITNESS: For me --
17
18 THE COMMISSIONER: Go ahead, Dr Moeller.
19
20 THE WITNESS: Yes, thank you. For me, it wasn't a joke.
21 If it was a joke, it was in very poor taste.
22
23 MR HICKEY: Q. Can I clarify my question. I'm not
24 suggesting to you that what he said to you in 2008 was
25 a joke. Do you understand that?
26 A. Yes.
27
28 Q. What I'm suggesting to you is that his impression was
29 that on the occasions it has been brought up since, he has
30 intended it as a self-deprecating joke to recognise the
31 fact that he has lost his cool in an entirely inappropriate
32 way with you on that occasion in 2008 and remains
33 embarrassed about it to this day?
34 A. Oh, I'm surprised by that.
35
36 Q. Do you agree you have a sense of humour?
37 A. Yes. I'm actually quite funny, really.
38
39 Q. I can well imagine. Do you agree that you have taken
40 the mickey out of him about that on a few occasions?
41 A. Only in response to him saying it to me. That was how
42 I was trying to convey to him that it was not appropriate.
43 So he obviously realised that, because he thought I was
44 taking the mickey out of him.
45
46 Q. Might it also be that, regrettably, by your taking the
47 mickey out of him, he apprehended that you were both

1 sharing a joke at his expense in recognition of the fact
2 that he had acted improperly to you in 2008?

3 A. I don't think so.

4

5 Q. You were asked by my learned friend Ms Reece, counsel
6 assisting, about what you thought when the Commission of
7 Inquiry was convened.

8 A. Yes.

9

10 Q. You gave some answers about what your thoughts were
11 about that. Is it not also true that you told others
12 within your work group that, "Justin and Cathie are going
13 down"?

14 A. I don't think so. Going - nothing's been proven yet.
15 Why - nothing's - it's part of the Commission.

16

17 Q. So you didn't say to any of your colleagues, "Justin
18 and Cathie are going down"?

19 A. I don't recall saying that, no.

20

21 Q. Would you agree with me that if you had said that -
22 and I accept you don't recall whether you did or not - that
23 behaviour would be contrary to the values and behaviours to
24 which employees within the lab have agreed to adhere?

25 A. Well, if I had said --

26

27 THE COMMISSIONER: Just wait a moment, Dr Moeller.

28

29 MS REECE: It might be useful to the witness if that's
30 more readily explained, with reference to particular parts
31 of a code of conduct, for example.

32

33 THE COMMISSIONER: Let's see if there is a difficulty.

34

35 Q. You were going to give an answer, Dr Moeller? It was
36 being put to you that making such a statement would be
37 contrary to what the code of conduct expected?

38 A. Well, it depends what is meant by that statement, for
39 starters. I mean, that can mean anything. But if it was
40 meant in the way you have put it forward, possibly, yes.

41

42 MR HICKEY: Q. Dr Moeller, I noticed that you were
43 sitting in a room with Ms Rika outside today?

44 A. Yes.

45

46 Q. Have you discussed the evidence that you intended to
47 give in the Commission with Ms Rika?

1 A. No.

2
3 Q. Have you discussed with Ms Rika the evidence that you
4 have been giving in here this morning, during the break?

5 A. No.

6
7 Q. Now, to finish, there are some things that I want to
8 suggest to you and ask for your response to them. Isn't it
9 the case that there is a small group of people, and I'll,
10 for convenience, describe them as the "FRIT fuckers", who
11 have deliberately sown disharmony within the work unit in
12 an attempt to undermine Cathie Allen and Justin Howes?

13 A. So, firstly, I assume "FRIT fuckers" applied to
14 everyone, which I did mention earlier, so that would have
15 been all of FRIT. Are you saying all of FRIT is sowing
16 disharmony? I don't know if that's what you are implying.
17 But raising scientific issues, and repeatedly raising them
18 over years, and having them not acted upon, I don't
19 consider is disharmony. I think that's proper scientific
20 behaviour.

21
22 Q. You and Kylie Rika have made deliberate attempts to
23 undermine Justin Howes and Cathie Allen by way of
24 retribution for what you and she perceive to be slights
25 against Amanda Reeves in the workplace?

26
27 THE COMMISSIONER: Mr Hickey, that's not going to help me
28 unless I get some more detail about what the acts are that
29 are being alleged. Because at the moment, what I've seen
30 is in the correspondence and the evidence, but are you
31 putting particular acts constitute undermining and, if so,
32 shouldn't be you putting those acts? I mean, of course,
33 I would expect if you put to a witness, Dr Moeller or
34 somebody else, "I put it to you that you engaged in
35 undermining - deliberately sowing discord and undermining",
36 and they say, "No", well, where does that leave us?
37 Whereas if you put particular acts that constitute
38 undermining, there might be some evidence about those acts
39 from elsewhere. But otherwise, I don't know what I'm going
40 to do with your question and her anticipated answer.

41
42 MR HICKEY: I'm happy to assist with another witness.

43
44 THE COMMISSIONER: Yes, all right.

45
46 MR HICKEY: Thank you, those are the questions.

47

1 THE COMMISSIONER: You didn't want to put anything in
2 relation to that?

3
4 MR HICKEY: Not to this witness.

5
6 THE COMMISSIONER: All right, thanks. Ms Reece, do you
7 have any re-examination?

8
9 MS REECE: Just very briefly, Commissioner.

10
11 <EXAMINATION BY MS REECE:

12
13 MS REECE: Q. You were asked some questions in
14 cross-examination about the lack of consensus in the lab
15 about the level to which samples should be microconned?
16 A. Yes.

17
18 Q. It perhaps raises the question, Dr Moeller, how do you
19 see issues like this should be explored? I think you said
20 that you would expect your line manager to perhaps do
21 something about it. How should scientific differences of
22 opinion be resolved, if necessary, in the lab?

23 A. Well - obviously they need to be explored further.
24 The aspects of the particular processes need to be looked
25 at more deeply and whether it's valid to have a certain
26 approach versus another approach. So there should be
27 a general discussion, not just about the actual reporting
28 scientists, but obviously the managers who then have to
29 implement changes or implement - or start projects or
30 processes. So it's an all-encompassing procedure, I feel,
31 that needs to be adopted when making changes.

32
33 Q. You were asked some questions about the notes that you
34 made in the Workplace Edge investigation, and they appear
35 at IM-11, which is [WIT.0011.0021.0001_R].

36 A. Yes.

37
38 Q. This is handwritten, and I think it says at the
39 bottom:

40
41 *Our jobs could be outsourced if we didn't*
42 *perform better.*

43
44 A. Yes.

45
46 Q. You've got there in brackets, "(bullying by the
47 chair)"?

1 A. Yes.
2
3 Q. Does that note jog your memory as to who made that
4 comment or from whom you understood that?
5 A. I - look, it is a while back. I don't know who
6 actually made that comment.
7
8 Q. Does your note afterwards imply that it was made by
9 the chair, whoever that was?
10 A. Yes. Yes.
11
12 Q. You just can't remember who that person actually was?
13 A. No, that's correct.
14
15 Q. Whether it was Paul Csoban, Cathie Allen or this
16 Alan Holz?
17 A. Yes, correct, I don't know.
18
19 Q. You were asked some questions about whether you
20 discussed your evidence with Ms Rika. The concerns that
21 you've had, that you told the Commission about, are
22 concerns that you have discussed with your colleagues,
23 aren't they?
24 A. Oh, the DIFP processes, sperm microscopy, of course,
25 they are all processes we've discussed in the past and are
26 discussing - well, they're coming up in discussions now,
27 yes.
28
29 Q. In fact, the way that you and some of the other
30 witnesses approached the Commission, confidentially, was
31 that you met together as a group and explained your
32 concerns to the Commission?
33 A. Yes.
34
35 Q. And that the process followed afterwards was that
36 individual interviews were carried out?
37 A. Yes.
38
39 Q. And individual statements were taken?
40 A. That's right.
41
42 Q. I understand your evidence is that you haven't shown
43 your statement to any of your fellow witnesses?
44 A. I haven't - well, I did show someone very briefly to
45 have a quick look at it, just to make sure - well, it's
46 a nerve-racking situation. I just wanted someone to have
47 a quick read of it.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. The whole of the statement?

A. It was just excerpts.

Q. And do you recall what the excerpts related to?

A. They were - no, I don't. It was very brief, some of the - you know, the excerpts, the interaction.

Q. Who was the person that you shared that with?

A. I actually showed excerpts of the final statement to - yesterday, to Angelina Keller, who had already given evidence.

Q. Why did you do that?

A. I guess I - I just felt like - having worked in our department for so many years, I lack - I've sort of started to lack confidence in the way I express myself, and I just wanted someone to say, "Yeah, that's okay, that sounds reasonable. It's not overly aggressive. That seems an okay comment to make", given my experience, but, yes.

Q. How have you felt in the lead-up to giving evidence before the Commission?

A. Oh, extremely stressed, extremely.

Q. How do you feel about going back into your workplace?

A. Also very stressed, yes.

MS REECE: Thank you, Commissioner. Nothing further in re-examination.

THE COMMISSIONER: Thank you, Dr Moeller, for your assistance. You are free to go and of course you are free to remain in the hearing room when we resume, if that's what you wish.

<THE WITNESS WITHDREW

THE COMMISSIONER: So 2.30 - does that suit everybody?

MS REECE: Thank you, Commissioner.

LUNCHEON ADJOURNMENT

THE COMMISSIONER: Yes, Ms Hedge.

MS HEDGE: Thank you, Commissioner. I call Kylie Dale

1 Rika.
2
3 <KYLIE DALE RIKA, sworn: [2.37pm]
4
5 <EXAMINATION BY MS HEDGE:
6
7 MS HEDGE: Q. You are Kylie Rika?
8 A. Yes.
9
10 Q. You are a senior scientist in the reporting team of
11 the Forensic and Scientific Services in Queensland?
12 A. Yes.
13
14 Q. You gave evidence on the first day of hearings of this
15 Commission about two and a half weeks ago?
16 A. Yes.
17
18 Q. You have provided two statements to the Commission.
19 The first was exhibit 2 and was tendered the last time you
20 were present. Can I have the second on the screen,
21 [WIT.0006.0145.0001]. Is that your statement?
22 A. Yes.
23
24 MS HEDGE: I tender that statement, Commissioner.
25
26 THE COMMISSIONER: Exhibit 78.
27
28 **EXHIBIT #78 STATEMENT OF KYLIE DALE RIKA, DATED 6 OCTOBER**
29 **2022, BARCODED [WIT.0006.0145.0001]**
30
31 MS HEDGE: Q. In that statement, Ms Rika, you deal with
32 a number of scientific and cultural-type issues?
33 A. Yes.
34
35 Q. We won't deal with all of them orally, but can
36 I direct you to a number of discrete ones. Can I take you
37 first to the issue that you describe as "DNAIQ issue",
38 which appears on page 9. This is an issue about
39 contamination that occurred using the DNAIQ extraction
40 chemistry; is that right?
41 A. Yes, in combination with the MultiPROBE robot.
42
43 Q. Do you remember how that first arose, how it first
44 came to your attention that there was some contamination
45 problem?
46 A. I recall the first real time I noticed an issue was in
47 a case that one of my staff members had, Golf Alcove, and

1 my staff member brought that case to my attention, and
2 then, from there, I started noticing more issues.

3
4 Q. That was Dr Moeller, was it?

5 A. Yes.

6
7 Q. Were you noticing things ad hoc or were you conducting
8 any part of the investigation into these issues?

9 A. To start with - to start with, it was ad hoc
10 observations, but then quite a few were occurring that
11 caused concerns such that we needed to start looking into
12 what could actually be happening with that.

13
14 Q. Can we move over on to page 10 and to paragraph 56.
15 In that paragraph, you say:

16
17 *The laboratory knew about the*
18 *contaminations at least from early February*
19 *2018 [sic] to the end of June ... without*
20 *a comprehensive investigation occurring.*

21
22 Do you see that there?

23 A. Yes, February 2008. So, yes.

24
25 Q. I'm sorry, I misspoke. February 2008?

26 A. Yes.

27
28 Q. To the end of June 2008?

29 A. Yes.

30
31 Q. When you say "(by reference to QQIs around the time)",
32 do you mean you went back, when preparing this statement,
33 and looked at the QQIs to identify this timing?

34 A. Yes. Yes, that's right.

35
36 Q. So do you remember now when the issue was raised with
37 you in relation to Golf Alcove?

38 A. I can't - it might have been around February 2008.

39
40 Q. You are not sure?

41 A. Not sure.

42
43 Q. So have you phrased this as you have from looking at
44 the QQIs?

45 A. Yes.

46
47 Q. Do you now remember why it was, or the reasons which

1 contributed to there being no comprehensive investigation
2 until the end of June 2008?

3 A. I recall at the time a few of us sort of trying to
4 work out is there an issue and what could be causing it,
5 but it wasn't until I think it was June 2008 that a firm
6 decision was made to stop processing and to really delve
7 further into - a proper investigation.

8
9 Q. When you say "a few of us", is that reporting
10 scientists?

11 A. From memory, I have memories of sitting down in a room
12 with Amanda, Ingrid, Emma. Some of those people were
13 reporting scientists at the time and some of them were
14 acting - I believe acting managing and also managers. So
15 Amanda was a manager, but I think possibly at some point
16 Emma may have been acting during that time. I'm not
17 a hundred per cent. But I do remember a few of us got
18 together to sit and try and work through what could be
19 happening.

20
21 Q. But if they were managers, they were managers of the
22 reporting team?

23 A. Yes, correct, yes.

24
25 Q. So you weren't sitting down with people from the
26 analytical team?

27 A. No.

28
29 Q. Were you assigned to engage in this discussion or
30 investigation by someone above you or did you just - was
31 this a --

32 A. No. This was just us, our little group, being
33 concerned and we decided to try and just sit down and sort
34 of, I guess, roundtable discussion, like, "Is this
35 a problem? Let's have a look at some of the things", and
36 eventually, based on that, we did discuss it with wider
37 management.

38
39 Q. And so who did you discuss it with, when you say
40 "wider management"?

41 A. At some point, I can't remember exactly when, we -
42 I have a memory of talking to Justin in the first instance
43 about my - about the issue but also about my stress around
44 it because - and there are some things that you remember
45 quite well, and I remember leaving work one day because
46 I was so stressed because I recall I had said words to the
47 effect of, you know, "This is a forensic DNA lab's worst

1 nightmare, to get cross-contamination in samples where you
2 don't really know where it's coming from."

3
4 Q. Was that before the end of June 2008, when the
5 processing stopped, that you had that discussion?

6 A. Yes, it was, yes, yes.

7
8 Q. Were you assigned to investigate any of the QQIs that
9 were raised?

10 A. I don't - my memory is a bit vague on it, but I do
11 remember being part of a team that came up with some
12 strategies around how to - strategies around how to check
13 samples that may possibly have been affected. I can't
14 remember if I was actually assigned specific QQIs to
15 address. But I do remember being involved more so in the
16 stage of - apart from the early discussions with the few of
17 us, later on I remember being involved in coming up with
18 ways to try and check the integrity of the results of
19 samples that may have been affected.

20
21 Q. Just focusing on this period, the February to June
22 period, you were the senior scientist in charge of the
23 reporting team at that time?

24 A. Yes.

25
26 Q. So you were attending the management meetings?

27 A. Yes.

28
29 Q. In those management meetings, would there be
30 discussion about the QQIs and what was being done about
31 them, or was that not a topic that was discussed?

32 A. I don't remember specific discussions in the
33 management team meetings about - so from memory, there
34 would have been - I think there would have been discussions
35 around, you know, myself and others raising, "This is what
36 I think that we're seeing", and then further discussion
37 around, "Oh, well, you know, do we need to - before we
38 start looking into it, we might need to gather as much
39 information as we can before we start looking into either
40 whether it's a problem or, if it is a problem, trying to
41 work out the source of the problem."

42
43 Q. So are you, in paragraph 56, saying that it took too
44 long to get to a comprehensive investigation, or are you
45 saying that was appropriate because there was an
46 information-gathering stage?

47 A. I - for me, I think it's both. I think it actually -

1 we probably could have started investigation, proper
2 investigation, sooner than it actually started, but at the
3 same time, there was a level of time required to actually
4 try and figure out what's happening. So I think it's a bit
5 of both.

6
7 Q. Were you agitating at that time for a quicker
8 response?

9 A. Yes. Yes, I was, yes.

10
11 Q. How did you do that?

12 A. As I mentioned, I remember having discussions with
13 Justin about my concerns around it. I remember vividly
14 being really stressed out about it. Like I said before,
15 some days I would just go home because I just couldn't
16 believe what we were facing at that time, and I just
17 remember also that the little group of us, so Amanda and
18 Ingrid and Emma - there might have been some more people,
19 but I just remember every day we would get together and sit
20 down and go, "Okay, let's roundtable this again. What are
21 we seeing? What can we do about it?", because we felt like
22 it was on us to do that, because it felt like nobody else
23 was really taking it as seriously, as quickly, as we were.

24
25 Q. Scientifically, just briefly, can you tell us how you
26 could tell that there were samples being contaminated?

27 A. So, first of all, you were seeing - we were seeing DNA
28 in our extraction negative controls, which you shouldn't
29 see that, because negative controls should have everything
30 else in it except for DNA. And then also we were seeing
31 curious results in some cases that didn't make sense, and
32 so that also sort of alerted scientists - because back
33 then, we had carriage of the whole case, so a reporting
34 scientist had carriage of the whole case, so it was quite
35 easy for a scientist back then to look over the entire
36 case, all of the results, and peculiarities could be more
37 easily picked up, because you might go, "Well, that's
38 a really random result for this case. I wasn't expecting
39 that", so you may question that and think, "Should I do
40 extra further quality checks on that?", that sort of thing.

41
42 Q. Could we scroll up the page a little, operator, to
43 paragraphs 53 and 54. You set out an account of a meeting
44 there on 28 July 2008. You say in paragraph 54 that Cathie
45 Allen asked each of the people in the meeting - this is
46 a management meeting --

47 A. Yes.

1
2 Q. -- what they thought the cause of the contamination
3 was and what a solution would be, and then she left "so we
4 could think about the options"?

5 A. Yes, that's right.
6

7 Q. Is that common for Cathie Allen to leave a management
8 meeting and for the rest of the group to discuss?

9 A. No.
10

11 Q. You have been on the management team a long time?

12 A. Yes.
13

14 Q. Is this the only time or is there - is it just a rare
15 occurrence?

16 A. I can't say for sure that it hasn't ever happened
17 before, but if it has happened before, it's definitely
18 a rare occurrence. I thought it was - like I said, I have
19 a vivid memory of certain things, and that particular
20 meeting I found to be quite odd because it felt like,
21 rather than the whole management team, including the
22 managing scientist, all being in the roundtable,
23 brainstorming, "What are we going to do?", process
24 together, like a team, it was almost like she left so that
25 we could make our decision, and I'm not really sure what
26 that was - why that was. So it was odd to me.
27

28 Q. When you say it was odd, are you taking into account
29 what she said later? Are you taking into account
30 everything that happened in the meeting, not just that she
31 left at the start?

32 A. Oh, yes, yes. So - yes.
33

34 Q. And that is what you have written in your statement
35 there, that after the management team said what their idea
36 was:
37

38 *[She] said that would cost a lot of money*
39 *and that if anything was mentioned from*
40 *higher up in management, she would direct*
41 *those people to us ... as it was our*
42 *decision.*
43

44 A. Yes, yes.
45

46 THE COMMISSIONER: Q. Ms Rika, the problem was in the
47 extraction process and contamination that was occurring

1 when, as we now know, there was drippage or something from
2 well to well because of a plastic cover that was used or --
3 A. Yes, yes, that's right.

4
5 Q. What's the spin basket, "re-extracting the spin
6 basket"? What are you referring to there, can you explain?

7 A. When a sample needs to have the DNA extracted from it,
8 the spin basket is a part of the tube where the swab or the
9 tape-lift or whatever sits in, and the DNA gets spun
10 through that spin basket, so that what you are left with is
11 just the swab, but sometimes the swab in the spin basket
12 can still contain DNA that hasn't fully been spun through
13 into the tube for --

14
15 Q. So you put the swab into a tube and it sits above,
16 like, a sieve, does it?

17 A. Yes.

18
19 Q. So that there is a tube, there is a sieve halfway
20 along it or a little way from the bottom, you put the swab,
21 the piece of swab, the top of the cotton bud, if you
22 like --

23 A. Yes.

24
25 Q. -- or the tape into there. You put a reagent in
26 there?

27 A. Yes.

28
29 Q. And then you put that tube into a centrifuge, do you?

30 A. Yes, I - yes.

31
32 Q. So it spins?

33 A. Yes.

34
35 Q. The idea is that the DNA in the swab dissolves into
36 the water, and the effect of the centrifuge is that the DNA
37 is then spun to the bottom of the tube?

38 A. Yes.

39
40 Q. Leaving the swab in the little sieve?

41 A. In the - yes.

42
43 Q. Not entirely clear of DNA, as you have explained?

44 A. Yes.

45
46 Q. But most of the DNA is now at the bottom of the tube?

47 A. Yes.

1
2 Q. And it can be separated and taken away in a separate
3 operation?
4 A. Yes, that's right.
5
6 Q. So what you have posited is that the swab, after that
7 process, still might have some DNA in it?
8 A. Yes.
9
10 Q. And the reference to "re-extracting the spin basket",
11 does that mean going to that tube --
12 A. Yes.
13
14 Q. -- and taking out that sample of DNA, if there is any,
15 from the cotton bud --
16 A. Yes.
17
18 Q. -- and processing that afresh?
19 A. Yes, that's right.
20
21 Q. Because that hasn't been contaminated, because the
22 contamination process happened later; is that it?
23 A. Yes, that's right. Yes, that's right.
24
25 Q. So what was being proposed is: we've got these
26 samples; they've gone through the spin basket; then they go
27 through this next process, where they get contaminated. At
28 least we know the original swab is clean?
29 A. Yes, yes.
30
31 Q. So let's reprocess it --
32 A. Yes, that's right.
33
34 Q. -- and do it again?
35 A. Yes.
36
37 Q. Of course, that's doubling up the work, so that costs
38 money, time and money?
39 A. Yes. Yes, it does, yes.
40
41 Q. Is that what you are referring to?
42 A. Yes, that's right, yes.
43
44 THE COMMISSIONER: Thank you.
45
46 MS HEDGE: Q. You say there "the management team had
47 said that they thought", and then there is the initial

1 option to progress, so was that a unanimous view of
2 everyone in the management team who remained in the room?
3 A. Yes, yes.

4
5 Q. You say in the last sentence that you "remember being
6 surprised and frustrated that cost seemed more important
7 than quality"?
8 A. Yes.

9
10 Q. Now, 2008 is shortly after Ms Allen became the
11 managing scientist; is that right?
12 A. I think so, yes, yes.

13
14 Q. And so at that time, it surprised you that she
15 mentioned cost and that it seemed more important than
16 quality?

17 A. Yes. I guess, for me, being - I know that I'm
18 a manager, but I'm also a court reporting scientist, and so
19 for me in that role, as a scientist, I don't really care
20 what something costs as long as I get the best-quality
21 result from the sample that I can. And so with my
22 scientist hat on, I - I was a bit dumbfounded that, hang
23 on, we just - we need to get the - we need to ensure the
24 integrity of the sample, no matter what, and I just was
25 surprised that another scientist, like Cathie -
26 I understand that she's a manager as well and has to weigh
27 up all the budgetary things, but I don't think it should
28 ever be at the expense of the quality of a sample.

29
30 Q. You joined the Queensland lab in 2006?

31 A. 2005, yes.

32
33 Q. Did you become senior scientist in 2006?

34 A. Yes.

35
36 Q. Is that what I'm thinking of?

37 A. Yes, that's right, yes.

38
39 Q. My apologies. So between 2005 and 2008 --

40 A. Yes.

41
42 Q. -- you had a different managing scientist?

43 A. Yes, that's right, yes.

44
45 Q. Who was that?

46 A. Vanessa Ientile.

47

1 Q. Was this approach of appearing to favour cost over
2 quality - was that an approach that you had seen from
3 Ms Ientile?

4 A. Not in this way, no, no. I mean, I had seen Vanessa
5 look for cost-effective ways to do things, but I never
6 really felt - well, I don't recall feeling that it was
7 cost-cutting at the expense of the quality of a sample.
8

9 Q. So since then, since 2008, when you were surprised by
10 the focus on cost over quality --

11 A. Yes.
12

13 Q. -- has that been something that you have seen in the
14 laboratory?

15 A. Yes.
16

17 Q. More commonly than before 2008, when you had
18 a different managing scientist?

19 A. Yes.
20

21 Q. Can you give us a few examples of the types of things
22 that you have seen in the laboratory since 2008 that have
23 been on that same theme of prioritising, it seems to you -
24 prioritising cost over quality?

25 A. Yes, well, I guess one of the things was - and
26 I mentioned this in my first lot of evidence around the DNA
27 insufficient for further processing.
28

29 Q. Yes.

30 A. That would be one example where it seemed that there
31 would be - well, a driver for that would be a cost saving
32 in both consumables and labour. I'm trying to think of
33 other examples.
34

35 Q. Can I show you what you have in your statement?

36 A. Yes.
37

38 Q. In paragraph 31 of your statement, on the same point
39 that I'm asking you about now, "focus on quantity over
40 quality" and efficiency?

41 A. Oh, yes, I see, yes. Oh, yes, yes. So, yes, we -
42 that's the other thing. So the DIFP thing but also when we
43 moved to the work list system that we have, rather than the
44 whole case management in its entirety approach.
45

46 Q. You also have there the expectation of scientists,
47 which is the "one profile data analysis and one review per

1 hour"?

2 A. Yes, that's right, yes.

3

4 Q. That's in paragraph 28 that's just above this. But
5 can I ask you about the last sentence of paragraph 31:

6

7 *Staff are often praised on their quick work*
8 *and their individual tallies.*

9

10 A. Yes.

11

12 Q. Can you tell us what you mean by this "individual
13 tallies"?

14 A. In the forensic register, we have a page that is
15 visible by all staff that keeps a track of each staff
16 member's tallies for their profile interpretations that
17 they do and also the reviews of samples that they do. And
18 I've heard quite a few times comments about scientists who
19 achieve really high tallies, you know, "That's just
20 amazing, fantastic. They work so hard, that's just" - you
21 know, and I have actually brought up in one of our
22 management quarterly review meetings where we sort of look
23 at how we've done as a lab over the last quarter - I've
24 actually brought up that we need to find a way, and I don't
25 know what the answer is, but - because staff have said to
26 me, you know, "Staff always get praised on the quantity of
27 work that they do, but what about those of us that take our
28 time to try and not make mistakes, and the quality of the
29 work that we do - how can we measure that?"

30

31 And so I brought that up in one of our management
32 quarterly review meetings. I don't have an answer to that,
33 because it is hard to measure, I guess, you know,
34 individual persons' quality, but it's something that I know
35 that staff get very - well, the staff that have spoken to
36 me get very frustrated that, you know, "Oh, it's just all
37 about numbers, and what about those of us who take a bit
38 more time, we want to cross Ts and dot Is, and we don't get
39 praised for that?"

40

41 Q. Do you remember when that was, like what year that was
42 that you raised it at the quarterly review?

43 A. Oh, it would have been probably a couple of years ago.

44

45 Q. Now, at the start of that answer, you said that you
46 have heard a lot of comments about scientists who have high
47 tallies, that they are "fantastic" or "wonderful"?

1 A. Yes.

2

3 Q. Sorry, I can't quite remember the exact words that you
4 used.

5 A. Yes, yes.

6

7 Q. So who did you hear say those comments?

8 A. I've heard it from Justin in particular and, you know,
9 just around - it comes up randomly, but then also it comes
10 up in team design as well.

11

12 Q. Team design, did you say?

13 A. So when - if there is a need to - we've got
14 reporting 1 and reporting 2, and if there is a need to
15 change those staff members around for whatever reason,
16 sometimes that comes into it, like, "Okay, well, if we
17 put - we need to put a high-output person in each team to
18 make it balanced." So, I mean, maybe that's fair, maybe
19 it's not, but that's just one example of the times that
20 I've heard Justin put an emphasis on individual persons'
21 tallies.

22

23 Q. When you've heard Justin make comments about it, has
24 that been to the scientist themselves or to you, as
25 a manager?

26 A. Both.

27

28 Q. When it's to a scientist themselves, is that in a
29 group setting or in a one-on-one, you know, performance
30 review or something like that, individual setting?

31 A. I can't recall, yes.

32

33 Q. Can we move, then, to a different topic, which relates
34 to an issue that arose in 2015 or 2016, sperm microscopy.
35 It starts on page 11, if we could go to that page, please,
36 operator. You say there at paragraph 60 that:

37

38 *In 2016, some reporting scientists raised*
39 *concerns to Amanda Reeves and [yourself] of*
40 *... differences between microscopy slides*
41 *prepared at the examination stage compared*
42 *to those prepared during the DNA extraction*
43 *process.*

44

45 A. Yes.

46

47 Q. So that's the issue that I'm asking about here, and

1 you set out some of your observations about it in your
2 statement. In paragraph 64, do you see you said:

3
4 *... I do not think the issue of sperm*
5 *microscopy was dealt with appropriately*
6 *from a cultural point of view and further,*
7 *from a scientific point of view, it took*
8 *a long time for the issue to be addressed*
9 *and resolved.*

10
11 The final part of that sentence, is that your only concern
12 about how it was addressed from a scientific point of view,
13 the length of time it took, or were you concerned by what
14 was done?

15 A. I think, like I say in my statement, eventually at the
16 end of it all, I was satisfied that the issue had been
17 addressed appropriately. But leading up to that point,
18 there was a lot of resistance in the management team to
19 sort of - so the hypothesis, I guess, was that perhaps the
20 slide - something within the slide-making process at the
21 evidence-recovery stage was not quite right, hence why
22 we're not seeing sperm on those slides, but then we see
23 them later on down the track in the differential lysis
24 stage.

25
26 And so what we, Amanda and I, wanted to do was really
27 investigate that evidence-recovery slide-making process and
28 try different ways of that process to see if we could make
29 it better. But there seemed to be a desire to do other
30 investigations that may be interesting but not really
31 relevant to the urgency of the matter.

32
33 So I didn't have an issue with all these other sort of
34 sensitivity experiments being done that were being proposed
35 by Allan, because that would be interesting, but I just
36 wanted to get straight in and fix the problem. So there
37 was a lot of time spent, I guess, trying to collect data to
38 show where an issue might be, as opposed to just, "Let's
39 get in and try and fix the ER slide-making process",
40 because that seems to be the issue. When you're seeing 1+
41 sperm on the ER slide, but in the extraction process you
42 see 3 or 4+ sperm, it's kind of quite obvious.

43
44 Q. You'll remember that there was a workaround
45 implemented in August 2016 --

46 A. Yes.

47

1 Q. -- so that in every case, the sample would go through
2 differential lysis and there would be both an ER slide and
3 a diff lysis slide?
4 A. That's right, yes.
5
6 Q. After that workaround was implemented, were you
7 content that the problem that had been advised to you would
8 not persist as a problem? Were you content that that
9 resolved the problem?
10 A. Not at that point, because the problem was, is there -
11 like I said, the hypothesis was, was there a problem with
12 the slide-making process at the evidence-recovery stage,
13 and so that workaround came in to just put the ER
14 slide-making process over here and go straight to the
15 differential lysis stage. So it didn't actually address
16 that, but the workaround was like a safety net, yes.
17
18 Q. Did it mean that no cases would be missed that would
19 have been missed before the workaround?
20 A. Yes.
21
22 Q. But it didn't identify the root cause of the problem?
23 A. No.
24
25 Q. That's the point you're making?
26 A. Yes, that's right, yes.
27
28 Q. Is there any of that ER slide-making procedure - is
29 that done for any other sample other than sperm?
30 A. No - no.
31
32 Q. Are you sure or are you unsure?
33 A. Sorry, say the question again?
34
35 Q. The slide-making procedure that --
36 A. Yes.
37
38 Q. -- you thought there might be an error in it.
39 A. Yes.
40
41 Q. Was it only done for sperm samples?
42 A. Yes, yes. Yes.
43
44 Q. So there were no slides being made of some other
45 samples?
46 A. No, no, no. No.
47

1 Q. Saliva or --

2 A. No. That's right. Sorry, yes.

3

4 Q. So that procedure of - if there was an error in the
5 procedure of making a slide, that would only affect sperm
6 samples?

7 A. Yes.

8

9 Q. So when you say in this paragraph that it took a long
10 time for the issue to be addressed and resolved - I'm
11 sorry, I withdraw that. Do you also remember that
12 Project #181 did not completely finalise until about
13 halfway through 2020?

14 A. Yes, that's right, yes.

15

16 Q. So when you say here that it took a long time for the
17 issue to be addressed and resolved, are you talking about
18 the time between when the issue was raised and August 2016,
19 when the workaround was put in, or are you talking about
20 the time between when it was raised to the end of
21 Project #181?

22 A. Yes, the second, yes.

23

24 Q. The second?

25 A. Yes.

26

27 Q. So did you have a concern about the time it took to
28 put in the workaround?

29 A. Yes, I did. Yes, yes.

30

31 Q. So both of those?

32 A. Yes, both, yes. Sorry. Yes, both.

33

34 Q. I understand. Just thinking about that first one --

35 A. Yes.

36

37 Q. -- the time between when the issue was first raised
38 and the workaround was put in --

39 A. Yes.

40

41 Q. -- so that sort of six or eight months, say --

42 A. Yes.

43

44 Q. -- what did you see as the reasons that it took that
45 long? What were the contributors to that?

46 A. I think there - from the incident that happened in the
47 management meeting that I previously spoke about in my

1 first evidence, because that became such a big thing, a big
2 cultural issue, it was almost like nobody - it was too
3 contentious for anybody to sort of continue dealing with
4 it. And also I do recall - and I don't know if this was
5 when Project #181 started - I think it was right at the
6 beginning of Project #181, the proposal for that, I do
7 remember that there was a long time that the project of
8 trying to get this fixed sat with Cathie, and I remember
9 raising it to - oh, I remember raising it in a management
10 meeting, you know, "What's happening with it?", and
11 I raised it a few times, and the answer just kept saying,
12 "It's still with Cathie", you know, "She hasn't had time",
13 or whatever, "to move it forward", and I'm not sure why
14 that was.

15
16 THE COMMISSIONER: Q. Is this after the workaround was
17 introduced or before the workaround was introduced you're
18 talking about?

19 A. Sorry, I can't remember.

20
21 MS HEDGE: Q. Can I assist, perhaps, with some
22 contemporaneous documents?

23 A. Yes.

24
25 Q. Can I have on the screen [FSS.0001.0052.8289]. As you
26 understand it - you wouldn't have seen this email, but is
27 this the project plan that you're talking about, version 1
28 of the proposal; is that what you were talking about when
29 you said that the proposal sat with Cathie?

30 A. Yes, that's right, yes.

31
32 Q. So that's 20 July 2016, before the workaround - at
33 least that it was sent to Ms Brisotto?

34 A. Yes.

35
36 Q. Could we now have on the screen [WIT.0002.0096.0001].
37 Do you see the email at the bottom of the page? This is an
38 email from you to Mr Howes, cc Amanda Reeves, on 28 July
39 2016?

40 A. Oh, yes.

41
42 Q. Ms Brisotto had come to speak to you about the issue,
43 and you had thought about it and this was your proposal,
44 that:

45
46 *Reporting team does its own project ...*
47

1 A. Yes, that's right, yes.
2
3 Q.
4 ... whereby we get people such as Adrian or
5 Jacqui or Rhys (ER experienced people) to:
6
7 1. Formulate a project proposal/plan ...
8 2. Carry out the experiments ... in the ER
9 lab - after 2pm [when the lab is empty].
10
11 A. Yes, yes.
12
13 Q. The ER scientists do their work as quickly as they can
14 in the morning, don't they?
15 A. Yes, they do, yes.
16
17 Q. Can we scroll down onto the second page of that. Can
18 we scroll down to the next email, please. This is
19 forwarding a previous email from May, from Justin --
20 A. Yes.
21
22 Q. -- to Allan and Kirsten, discussing ideas, and these
23 are the ideas identified by reporting staff?
24 A. Yes, that's right, yes.
25
26 Q. Can we go back up to the top of that document, please,
27 the first page of the document. There is an email from
28 Ms Reeves indicating that she wants to step away from it,
29 she says in the last line, and Justin can decide whether
30 her staff are involved?
31 A. Yes.
32
33 Q. So do you remember that? We can take that down now.
34 A. Yes, I remember that now.
35
36 MS HEDGE: I should tender those two emails. The first
37 email was from 20 July 2016, providing the draft project
38 plan.
39
40 THE COMMISSIONER: From whom to whom?
41
42 MS HEDGE: From Allan McNevin to Paula Brisotto.
43
44 THE COMMISSIONER: The email from Mr McNevin to
45 Ms Brisotto of 20 July 2016 is exhibit 79.
46
47 **EXHIBIT #79 EMAIL FROM ALLAN MCNEVIN TO PAULA BRISOTTO,**

1 DATED 20 JULY 2016, BARCODED [FSS.0001.0052.8289]
2

3 MS HEDGE: The second was an email from Amanda Reeves to
4 Kylie Rika and Justin Howes, dated 28 July 2016.
5

6 THE COMMISSIONER: That will be exhibit 80.
7

8 EXHIBIT #80 EMAIL FROM AMANDA REEVES TO KYLIE RIKA AND
9 JUSTIN HOWES, DATED 28 JULY 2016, BARCODED
10 [WIT.0002.0096.0001]
11

12 MS HEDGE: Q. That was 28 July 2016, so that's shortly
13 before the workaround was put in place by Allan McNevin?
14

15 A. Yes.
16

17 Q. Allan McNevin was the main proponent, if I can put it
18 like that, of Project #181; he was the leader of that
19 project?
20

21 A. Yes.
22

23 Q. He was the senior scientist in charge of the evidence
24 recovery section at that time?
25

26 A. Yes.
27

28 Q. That's why he was in charge of the project?
29

30 A. Yes, yes.
31

32 Q. Because it was his section that they were looking
33 into?
34

35 A. Yes, yes. Yes.
36

37 Q. Was your suggestion that the reporting team undertake
38 some project taken up?
39

40 A. No.
41

42 Q. Was that an idea that you continued to promulgate or
43 was that the effort you made, and when it was not taken up,
44 that was the end of it?
45

46 A. I think I may have suggested it more than once.
47 I can't be definite on that. But I do feel like it was
such an important issue at the time that - important issues
like that, I do tend to sort of harp on about them.
48

49 Q. So in the period between the start of 2016 and August
2016, you identified one contributor to the delay being the
cultural issue that had arisen since the management meeting
meant it was too contentious, and Allan wanted to discuss
50

1 it or work on it?

2 A. Yes.

3

4 Q. And, secondly, that there was some period that the
5 project proposal was with Cathie Allen and not being
6 progressed, as far as you were aware?

7 A. Yes, that's right, yes.

8

9 Q. Are there any other contributors to the delay that you
10 remember for that first period?

11 A. Again, I think it was just the desire for wanting to
12 collect data and do other studies to show what I would
13 consider interesting information but not relevant for the
14 urgency of the matter. So there seemed to be - like,
15 I recall Allan wanting to do a whole lot of sensitivity
16 experiments looking at not just the sperm but other
17 components of semen, and, like I said, interesting, but for
18 me, I just wanted to get in and fix the issue. So there
19 was delay, I think, because there was that desire to do
20 these other tests.

21

22 Q. You said before that at the time of the workaround,
23 August 2016, you weren't content that a cause of the
24 initial problem had been found?

25 A. No.

26

27 Q. But you were content that a practical solution had
28 been put in place that would --

29 A. Yes.

30

31 Q. -- catch the cases that might have been otherwise
32 missed?

33 A. Yes, a safety net, yes.

34

35 Q. What about by the end of Project #181, did you think
36 a cause had been found of the initial problem?

37 A. I don't think so. I haven't read the report for
38 a while, the Project #181 report, but I think it kind of
39 generally - from memory, I think it generally pointed to
40 that there was some issue, the most likely issue being some
41 part of the evidence-recovery slide-making process not
42 being as optimum as it could be, but I'm still - from
43 memory, I still don't think we actually got to the specific
44 problem.

45

46 Q. You said, when I asked you before, that the length of
47 time that whole project took was also too long, in your

1 view, scientifically?

2 A. Yes.

3

4 Q. And what do you think are the contributors to that
5 delay?

6 A. I do recall - like I said, it was a contentious
7 project, so various people that we had identified that
8 should be on the project - some of them kind of didn't want
9 to do it because it had become such a contentious thing,
10 and so there was a bit of --

11

12 THE COMMISSIONER: Q. But the upshot of it was that this
13 problem was revealed at least by - at the latest, by early
14 2016; in July, Ms Reeves was offering to work on it, and
15 you were proposing that some members of your team might
16 work on it?

17 A. Yes.

18

19 Q. Did you get any response to your proposal, at least?

20 A. No.

21

22 Q. And so Mr McNevin was working on a project?

23 A. Yes.

24

25 Q. But hadn't produced anything, for reasons we don't
26 know yet?

27 A. Yes.

28

29 Q. In August, a workaround was proposed and adopted --

30 A. Yes.

31

32 Q. -- which solved the problem for the interim?

33 A. Yes.

34

35 Q. But months had passed and nothing had actually been
36 done towards identifying the cause of the failure to detect
37 sperm?

38 A. That's right, yes.

39

40 Q. And in fact, nothing was done until the report was
41 produced three or four years later, in 2020?

42 A. Yes, that's right.

43

44 MS HEDGE: Q. Could we have the statement back on the
45 screen, please, paragraph 67. You say you were involved in
46 some data analysis with Ms Brisotto --

47 A. Yes.

1
2 Q. -- in 2017 to see what impact the issue may have had
3 on cases in terms of evidential outcomes?

4 A. Yes.

5
6 Q. Again, you say there was some feedback back and forth?

7 A. Yes.

8
9 Q. And Matthew Hunt and yourself "could not support the
10 assertions and justifications being made in the report"?

11 A. Yes.

12
13 Q. Can you tell us what they were, what the assertions
14 being made that you disagreed with were?

15 A. So there seemed to be - it was similar - the
16 assertions and justifications seemed to be quite similar to
17 those of the Options Paper where certain justifications
18 were being made to - so, for example, you know, "Okay,
19 well, if we look at this sample that didn't have sperm
20 seen, what else is in the case that may have still provided
21 evidence to the Queensland Police?" So, in that case,
22 "Don't worry about that one, because there was something
23 else in the case anyway."

24
25 So things like that that, you know - I can't remember
26 off the top of my head all of them, but I just remember
27 thinking we can't use those types of justifications to say
28 that the risk of not seeing sperm would be minimal, because
29 every single sample - like, every case is different, every
30 allegation is different, every set of circumstances is
31 different, so just because you have seen sperm on another
32 sample in the case might not be as relevant as seeing sperm
33 from a high vaginal swab. You might see sperm on a shoe,
34 but that might not be as evidently significant as seeing
35 sperm from a high vaginal swab.

36
37 Some of the other - I'm just remembering now, some of
38 the other things were, okay, so what DNA results - so we
39 didn't see sperm, but what was the DNA result? And it was
40 still a male profile, so that's okay. Well, that's not
41 okay, because it would be good to be able to put some
42 weight around the likely source of that male DNA profile.
43 And if you don't have sperm, you can't say anything about
44 that. So just because we've got a male profile matching
45 the suspect, the absence of sperm - that doesn't make the
46 absence of sperm justified.

1 So it was things like that that Matthew and myself -
2 I remember having a lot of discussions with Matthew about
3 it. I think Matthew was acting the other reporting senior
4 at the time, and we both - we tried to review and prepare
5 a paper that might be useful in some way, but we just
6 couldn't get there because the - we couldn't support what
7 was in that particular paper.

8
9 Q. Can we move on to a different topic, and it is about
10 a meeting that you had with Ms Allen in 2018 relating to
11 a confidential bin?

12 A. Oh, yes.

13
14 Q. Can we turn to page 13, please, operator, and
15 paragraph - actually, before we do that, you were sent an
16 email giving you a direction to attend this meeting; is
17 that right?

18 A. That's correct, yes.

19
20 Q. That's KR-07 of this statement, and it's
21 [WIT.0006.0154.0001]. This is the direction given to you
22 by Ms Allen?

23 A. Yes.

24
25 Q. To meet and discuss a workplace matter relating to
26 compliance with workplace record-keeping practices --

27 A. Yes.

28
29 Q. -- in which you may have further information and/or
30 have been involved?

31 A. Yes.

32
33 Q. Turning on to the next page, we see that there is
34 a statement about lawful directions and employee
35 assistance. Do you see that?

36 A. Yes.

37
38 THE COMMISSIONER: Ms Hedge, the second page, "Lawful
39 directions: Confidentiality" - this is the same email and
40 the same time as the one that was sent to Dr Moeller; isn't
41 that right?

42
43 MS HEDGE: Yes.

44
45 THE COMMISSIONER: Are you aware of any legislative basis
46 upon which somebody can ask, in an email like this from
47 a person in that position, to someone employed like Ms Rika

1 to be required not to tell anyone? I know the CCC has
2 legislation that empowers them, for obvious reasons.

3
4 MS HEDGE: Look, I don't know.

5
6 THE COMMISSIONER: We will ask someone else. Yes, carry
7 on.

8
9 MS HEDGE: I can attempt to get back to you on that,
10 Commissioner.

11
12 Q. Can we go back to your statement, page 13,
13 paragraph 74. The meeting took place with an industrial
14 advocate present with you. You say there in paragraph 74
15 that Cathie asked you whether you had seen anything go into
16 the confidential bin that should not go in there on the day
17 that Amanda packed up her belongings in the office space to
18 leave DNA analysis?

19 A. That's right, yes.

20
21 Q. And Amanda was mentioned by name?

22 A. No. So - I don't think so. I think Cathie did tell
23 me the date and the day, and in my mind I went, "Hang on,
24 that's the day that Amanda left", so I put that together.

25
26 Q. I see. So she told you a date?

27 A. Yes.

28
29 Q. Which was how long before this meeting?

30 A. It wasn't long.

31
32 Q. Weeks or months?

33 A. Oh, weeks, yes.

34
35 Q. How long did the meeting go for with Cathie while she
36 asked you about that singular topic?

37 A. Probably - it wouldn't have - it probably wouldn't
38 have been more than an hour, but somewhere between
39 30 minutes and an hour.

40
41 Q. And so did she ask you a number of questions about
42 that? She didn't just ask you that one, if it took between
43 30 minutes and an hour?

44 A. So - no, she did just ask me that question, but
45 I think it went on - the meeting went on, because she also
46 was asking me if I had any questions or anything like that,
47 which I had a few questions.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. Did she ask you whether you put anything into the confidential bin?

A. No, she just asked me if I had seen anything go in there that shouldn't go in there, and I remember saying something like, "Well, stuff goes in that confidential bin every day, because we have, you know, confidential DNA profiles that we don't use any more", or whatever, but I don't - I don't stand there and monitor what goes in, because I'm busy.

Q. What did Cathie say at the end of the meeting, if anything, about what the next steps would be in this matter?

A. She said that she would need to consider the information that we had discussed, which was that I didn't see anything go in there that shouldn't go in there - she needed to consider that, and I'm pretty sure she said she needed to discuss it with Paul Csoban and then she would - and Therese O'Connor, who was the HR person in the meeting, they both said that they would get back to me with follow-up, outcome, whatever.

Q. And did you ever get any follow-up, outcome?

A. No.

Q. To this day, do you know what came out of that meeting?

A. No. I did - I did follow up with Therese O'Connor myself. I just said, "Look" - because I bumped into Therese O'Connor in the library, and I just said to her, "By the way" - this was quite a few weeks later. I just said, "What's come of that meeting that I had, because that was a really stressful time for me and I'd really like an outcome or" - and she basically said that - that basically the answer to that question might be obvious in the sense that Paul Csoban was no longer employed as ED.

Q. And that's all she said to you about it?

A. Yes.

Q. That was the end of your conversation?

A. Yes.

THE COMMISSIONER: Q. Did you know what that meant?

A. No, because it - when it was said to me, I - to me, I was - given how I felt that I had been perceived by Paul

1 Csoban, I was actually - that was enough for me, because
2 I - that - you know, I was happy to not have that
3 additional person causing stress in my life.
4

5 Q. What was your understanding of how he, Mr Csoban,
6 regarded you?

7 A. I only had one meeting with Mr Csoban on a one-to-one.
8 I mean, he would have come to all DNA meetings, sometimes,
9 but one-on-one with me and him, it was one meeting and that
10 was where he called me in to a meeting with himself and
11 another person, Alan Holz from a cultural change company
12 called Workplace Edge, to basically tell me that there was
13 going to be a presentation to the reporting teams about --
14

15 Q. This preceded that meeting at which the Workplace Edge
16 people had done their study and --

17 A. Yes.

18
19 Q. -- things were presented to the team. So the only
20 one-on-one meeting - well, Mr Holz was there?

21 A. Yes.
22

23 Q. But the only personal meeting, the only meeting you
24 had with him where you had a one-on-one interaction with
25 him, was that particular meeting, so other than that --

26 A. Yes.
27

28 Q. And he was informing you of something there?

29 A. Yes, he was telling me that, "Here's the heads up,
30 we're going to have this meeting with reporters, and also,
31 by the way, you should know that your nexus" - he used the
32 word "nexus" - "your nexus with Amanda was a big problem to
33 staff."
34

35 And when I realised that it was quite a - I felt that
36 it was a rude meeting, I thought, oh, maybe I should take
37 some notes, but I didn't have a pen or paper with me, and
38 so I said, "Look, can we stop so I can go and get a pen and
39 paper to take some notes from this meeting?", and Paul
40 Csoban just sort of tossed me a pen and paper and said,
41 "There you go." So I felt like - I thought, "Oh my gosh,
42 like, what have I - like, what have I done?", and so the
43 only thing I can think of why he thought badly of me was my
44 good relationship with Amanda, and maybe based on what
45 Cathie thought about me and Amanda, and maybe her
46 conversations with Paul.
47

1 MS HEDGE: Q. Can I come back to this meeting, the 2018
2 one about the confidential bin. So after this meeting,
3 other than the conversation you have just described with
4 Therese O'Connor - well, you haven't had any follow-up from
5 Therese O'Connor or Cathie Allen about whether there was
6 any resolution to what they were asking questions about?

7 A. No, no.

8
9 Q. Now, can we move forward to paragraph 82 of your
10 statement, please. This is the meeting, in paragraph 82,
11 that you just were describing to the Commissioner, with
12 Paul Csoban and Alan Holz, where he said that --

13 A. Oh, yes, yes. Yes.

14
15 Q. In paragraph 84, you said that in relation to the
16 presentation that the Commissioner just mentioned, your
17 impression of it was that they had not listened to the
18 concerns that had been raised by yourself and other staff?

19 A. Yes.

20
21 Q. Now, I assume - well, you tell me: did you believe
22 that they had listened to the concerns of some staff?

23 A. Yes.

24
25 Q. But just not you and some others?

26 A. Yes, that's right.

27
28 Q. In paragraph 86, you mention that you sent emails to
29 Michel Lok and Peter Bristow about the staff feedback on
30 that presentation. That email wasn't attached to your
31 statement, but can I provide it to you now,
32 [WIT.0006.0165.0001]. Let's put that on the screen. Do
33 you see the email at the bottom there, 30 January 2018?

34 A. Yes.

35
36 Q. "Feedback and Workplace Edge"?

37 A. Yes.

38
39 Q. You say in the last paragraph:

40
41 *Since the presentation ... [you] have been*
42 *made aware of 8 staff within the reporting*
43 *teams, who either were disappointed by the*
44 *management of the process ... or felt that*
45 *their feedback was not well represented ...*

46
47 A. Yes.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

Q. And this is the feedback that they felt - this is their feedback to you in these dot points here?

A. Yes, that's of some of it, not all of it.

Q. So these eight people, were they all from your reporting team or were they from a mix of the two reporting teams?

A. A mix of the two, yes.

Q. You summarised this and sent it to the more senior people in Queensland Health because of your concerns?

A. Yes.

MS HEDGE: I tender that email, please, Commissioner.

THE COMMISSIONER: Exhibit 81. What's the date of it?

MS HEDGE: 30 January 2018 from Ms Rika to Michel Lok. I'm sorry, I should probably do the first email on the page. It's 31 January 2018, from Peter Bristow to Kylie Rika.

EXHIBIT #81 EMAIL FROM PETER BRISTOW TO KYLIE RIKA, DATED 31 JANUARY 2018, BARCODED [WIT.0006.0165.0001]

MS HEDGE: Q. Looking at these emails now, you first sent that one to Michel Lok, then you forwarded it to Peter Bristow saying that you had just been informed that Michel was on leave?

A. Yes, that's right.

Q. And the top email is Peter Bristow replying, saying that he will ask Andria Wyman-Clarke to look into this?

A. Yes.

MS HEDGE: I'm sorry, Commissioner, I'm not sure you gave it a number yet.

THE COMMISSIONER: Exhibit 81, yes.

MS HEDGE: Thank you.

Q. And so did Andria Wyman-Clarke come back to you about this issue?

A. Oh, yes, immediately, by telephone. She called me and basically said, "Firstly, let me commend you on an

1 excellent email and your courage to do so", and I had
2 explained to her that, you know, sending a complaint like
3 this to somebody as high up as Dr Bristow was a big deal
4 for me, because I don't like to cause trouble like that.

5
6 THE COMMISSIONER: Q. Who was Dr Bristow?

7 A. He was the - at the time, he was the CEO of Health
8 Support Queensland. So she, yes, talked me through how she
9 could support me with my concerns.

10
11 MS HEDGE: Q. She did that over some period of time?

12 A. Oh, yes, yes.

13
14 Q. You spoke to her over a period about how she could
15 support you?

16 A. Yes, yes.

17
18 MS HEDGE: Thank you, Commissioner. Those are my
19 questions, thank you.

20
21 THE COMMISSIONER: Mr Hunter?

22
23 <EXAMINATION BY MR HUNTER:

24
25 MR HUNTER: Q. Ms Rika, could we go to your statement -
26 Mr Woolridge, to page 2, the section headed "The
27 difficulties with the current system". You might recall
28 that I act for the Queensland Police Service.

29 A. Yes.

30
31 Q. Back when the evidence gathering or the sampling of
32 exhibits was done by scientists at the laboratory, the lab
33 reached the point where turnaround times were extremely
34 long?

35 A. Yes.

36
37 Q. Unacceptably so?

38 A. Yes.

39
40 Q. You accept, I assume, then, that if the system were to
41 change so that scientists again went back to receiving
42 physical items at the laboratory and identifying what's to
43 be sampled and where, there's going to need to be
44 a substantial increase in resources?

45 A. Yes.

46
47 Q. Otherwise, we will be back where we were in 2008?

1 A. Yes, yes.

2

3 Q. When I say "a substantial increase in resources", do
4 you accept that you might need at least another
5 30 scientists?

6 A. I'm not sure on numbers. I mean, there's a couple of
7 things with this, in that it could be possible to find - so
8 at the moment, we have the situation that we have, which is
9 the in-tube process. In the old days, we had the other
10 extreme of that, which is us examining items and all of
11 that. It's possible that we could find some places in
12 between those two extremes.

13

14 Q. I was going to suggest some to you, actually.

15 A. Oh, right.

16

17 Q. But I would be interested to hear your views as well.

18 A. I haven't - I mean, I haven't actually sat down and
19 worked out exactly how that could be, but I - there are -
20 the main point of moving away from the in-tube process that
21 I'm a proponent of is to allow more engagement from all
22 relevant experts.

23

24 Q. So if there are to be improvements, an essential
25 component of that needs to be greater communication between
26 the investigators, the scientific officers and the forensic
27 biologists?

28 A. Yes, yes.

29

30 Q. Do you agree that given that the scientific officers
31 are the ones who actually go to the scene, having been to
32 the scene and seen what was there, that puts them in a very
33 good position to work out what items ought to be sampled
34 and how?

35 A. Yes, yes.

36

37 Q. Last time you were giving evidence, we spoke about the
38 form QP127 --

39 A. Yes.

40

41 Q. -- which might still exist, but it's not necessarily
42 always completed by the police; is that your understanding?

43 A. Yes, I think so. I mean, I - sometimes we get it sent
44 in with some cases but not others.

45

46 Q. But importantly, the QP127 gives the scientists
47 important context about what was alleged to have happened?

1 A. Yes.

2

3 Q. And perhaps highlighting the significance of one or
4 more of the swabs or tape-lifts?

5 A. Yes, that's right, yes.

6

7 Q. So if the form QP127 isn't retained in its current
8 form, would it be nonetheless helpful that the
9 forensic-register contain readily accessible information of
10 a like kind?

11 A. Yes, that would be fine.

12

13 Q. In your view, is the forensic-register, as it
14 currently exists, well designed in the sense that it
15 enables someone like you to readily look at the photograph
16 and the presumptive testing that was done by the scientific
17 officer or scenes of crime officer?

18 A. It does allow us to see those photos. So in that way,
19 yes, it's - but in other ways, and I think I said this in
20 my first round of evidence, without us looking at the
21 stains ourselves and doing the screening ourselves, the
22 presumptive screening, and then we get a profile - I mean,
23 there's still a gap there between - like, who's going to
24 put all of that together?

25

26 Q. That's what I was going to ask you about, is that what
27 you need is more context?

28 A. Yes.

29

30 Q. So some sort of understanding of, for example, if it
31 is a swab taken from a T-shirt, who is said to have been
32 wearing it or who is suspected to have been wearing it;
33 that might assist you in identifying the relevance of
34 a particular sample?

35 A. Yes, that type of information would be very helpful.

36

37 Q. So we don't go back to the system that obtained before
38 2008. Is it possible that appropriate improvements can be
39 achieved by modifying the forensic register so as to
40 provide more information to scientists?

41 A. Yes.

42

43 Q. And obviously there needs to be some changes in terms
44 of how the evidence is recovered at the lab, because it's
45 important at that stage that people look at the case and
46 make informed decisions about what is and is not important?

47 A. Yes, that's right.

1
2 MR HUNTER: Those are the only questions I have.

3
4 THE COMMISSIONER: Mr Hunter, do you have any instructions
5 or information concerning why and how the system was
6 changed from the lab doing the immediate recovery work
7 dealing with the physical samples to the current system -
8 do you know what that history is?

9
10 MR HUNTER: The limited information I have is that the
11 turnaround times were extremely long prior to the change in
12 the system. It could be sometimes as long as 12 months
13 from the submission of articles for examination to the
14 production of results. Beyond that, I am really hesitant to
15 speak at the moment, but --

16
17 THE COMMISSIONER: I would be grateful if you made
18 inquiries. There might be somebody in QPS who was there at
19 the time. I think it was because - the understanding
20 I have now, but I don't know why I have that understanding,
21 is that the system was changed in order to relieve FSS from
22 doing that work, and that saved them a lot of time and
23 allowed them to apply resources to elsewhere.

24
25 MR HUNTER: Yes.

26
27 THE COMMISSIONER: And that the police were happy with
28 that change.

29
30 MR HUNTER: Inspector Neville was a scenes of crime
31 officer at the relevant time, so I suspect he will know.

32
33 THE COMMISSIONER: He might know.

34
35 MR HUNTER: I will make some inquiries with him.

36
37 THE COMMISSIONER: Thanks. Mr Diehm?

38
39 MR DIEHM: Yes, thank you, Commissioner.

40
41 <EXAMINATION BY MR DIEHM:

42
43 MR DIEHM: Q. Ms Rika, I act for Ms Brisotto. May I ask
44 you some questions about the part of your most recent
45 statement that starts at paragraph 68 on page 12. I'm
46 sorry, it starts at, I should say, page 11, in
47 paragraph 60. This is about the sperm microscopy. And

1 over to page 12, relevant directly to my client, is what
2 you say in paragraph 67 about that draft report that was
3 being prepared in 2017.

4 A. I think it was 2017.

5
6 Q. Yes, I will take you through some documents that might
7 help you with respect to your recollection about those
8 matters because, for instance, at the end of paragraph 67,
9 you say there that you can't recall what happened after the
10 point in time of the lack of support that you say that you
11 and Mr Hunt were able to provide for the draft report. So
12 we can go through a few of those things.

13
14 Just in terms of the chronology, you were taken by
15 Ms Hedge, counsel assisting, earlier to some email
16 communications in July 2016, including one where
17 Ms Brisotto was sent in late July what appears to have been
18 a first draft of a Project #181 proposal?

19 A. Yes.

20
21 Q. Do you recall that? That's in the context of the
22 meeting that you have spoken of where there was the
23 conflict for Ms Reeves that she experienced occurring in
24 June 2016?

25 A. Yes.

26
27 Q. Do you recall it being the case that Ms Brisotto
28 herself had been off for a reasonably long period of
29 maternity leave up until about mid-July 2016?

30 A. Yes, I think so.

31
32 Q. So at the time of that email communication where she
33 receives the draft project proposal, she's not long back
34 from that leave; does that ring a bell?

35 A. I think so, yes.

36
37 Q. The project proposal came to be signed off by the
38 management team, do you recall - the Project #181 proposal?

39 A. Yes, I think so.

40
41 Q. Can I ask if this document can be put up on the
42 screen, please, [FSS.0001.0013.2498]. Just on that front
43 cover, we can see there that this is Project Proposal #181,
44 and it's marked as being a document created in August 2016.
45 If I can ask if we can go then, please, to the second page,
46 and then to the third page, please, we can see there
47 a collection of signatures of the management team for this

1 particular project proposal, including your signature,
2 between 7 October and 13 October 2016?

3 A. Yes.

4
5 Q. So what we can gather from these documents is that,
6 late July, there is an initial proposal by Mr McNevin that
7 he forwards to Ms Brisotto for this particular project, but
8 it's then October 2016 when the project proposal is finally
9 signed off?

10 A. Yes.

11
12 Q. We can see, looking up into the version history, that
13 the original version is dated 16 August, so a date after
14 that first draft that was forwarded to Ms Brisotto, and
15 then a further version on 28 September incorporating
16 feedback post review?

17 A. Yes.

18
19 Q. So having regard to the usual way in which these
20 things work, when you look at those dates to refresh your
21 memory, it might be reasonable to suppose that Mr McNevin
22 gives to Ms Brisotto a first cut; he then, with whatever
23 feedback he gets from her or anybody else, goes away and
24 prepares another version, which is on 16 August; that gets
25 circulated --

26 A. Yes.

27
28 Q. -- to the management committee; they provide feedback
29 to him over whatever time period that results in him
30 preparing a further version of that document on
31 28 September?

32 A. Yes.

33
34 Q. All of that makes sense?

35 A. Yes.

36
37 Q. And then, within one to two weeks of that, the
38 management committee all sign off on the proposal?

39 A. Yes.

40
41 Q. The project itself, as we know, didn't result in
42 a report until mid-2020, and what I suggest to you happened
43 was that over time, information was derived from the
44 project workings and further design change took place with
45 respect to the project, and then further investigations
46 were carried out as a result of those changes in design;
47 does that ring a bell?

1 A. Probably, yes.

2
3 Q. I will ask if the witness can be taken, please, to
4 document [FSS.0001.0013.2516]. We can see that this
5 document on the cover sheet is described as being Part 2 of
6 Project Proposal #181. The cover sheet bears the date
7 April 2017?

8 A. Yes.

9
10 Q. If we can go to the third page, please, there the
11 Part 2 gets the sign-off from the management team in the
12 first few days of May 2017?

13 A. Yes.

14
15 Q. Including yourself?

16 A. Yes.

17
18 Q. If we look at the fourth page of that document, in the
19 section "Introduction", we can see that it says:

20
21 *This Experimental Design document outlines*
22 *additional experiments agreed upon by the*
23 *Decision Making group after the results of*
24 *initial experimentation were presented*
25 *16-03-2017.*

26
27 A. Yes.

28
29 Q. So that's that idea that there were some changes to
30 the design because there were some additional experiments
31 that the information that had been yielded to that date
32 suggested should be pursued?

33 A. Yes.

34
35 Q. What the project was pursuing ultimately, if I might
36 put it in these terms and ask whether you agree with it,
37 was: how should we manage the question of detecting
38 spermatozoa DNA from these sorts of samples in the future?

39 A. Yes.

40
41 Q. It was a forward-looking document; it was trying to
42 say: what's the process we should follow from here?

43 A. Yes.

44
45 Q. Including a particular focus upon looking for
46 sensitivity in microscopy?

47 A. Yes.

1
2 Q. Can I ask, then, Commissioner, if the next document
3 can be put up on the screen, [FSS.0001.0013.2524], and this
4 then becomes Project Proposal #181 Part 3, with the cover
5 sheet suggesting a date of May 2018?

6 A. Yes.

7
8 Q. Can we go to page 3, please, and again sign-off on the
9 Project Proposal Part 3 in early June 2018 by each of the
10 management committee members?

11 A. Yes.

12
13 Q. Including yourself?

14 A. Yes.

15
16 Q. Again, if we go to page 4, the same section,
17 "Introduction", we can see that the document reports that
18 there are:

19
20 *... additional experiments agreed upon by*
21 *the Decision Making group after the results*
22 *of previous experimentation were*
23 *presented ...*

24
25 A. Yes.

26
27 Q. If I can ask, then, if we could go, to complete the
28 parts in terms of the proposal, to document
29 [FSS.0001.0013.2544]. This, then, was the fourth and final
30 part of the project proposals, bearing the date on the
31 cover sheet March 2019. Do you see that?

32 A. Yes.

33
34 Q. Again, if we go to page 3, we can see that the
35 management team signed off on this document in early March
36 2019?

37 A. Yes.

38
39 Q. Including yourself again. And, again, to page 4 of
40 the document, a similar comment made in section 1
41 "Introduction", that it:

42
43 *... outlines additional experiments agreed*
44 *upon by the Decision Making group after ...*
45 *previous experimentation ...*

46
47 A. Yes.

1
2 Q. We can take it from there that those four proposals
3 were the proposals under the process used at the lab at FSS
4 to result in the report that was ultimately produced in
5 2020?

6 A. Yes.

7
8 MR DIEHM: I should stop and tender those four documents.

9
10 THE COMMISSIONER: Shall we tender them as a bundle?

11
12 MR DIEHM: I think so, yes, Commissioner.

13
14 THE COMMISSIONER: The bundle of Project #181 documents
15 are exhibit 82.

16
17 MR DIEHM: Might they be called "Project Proposal" or
18 "Project #181 Proposals"?

19
20 THE COMMISSIONER: Project #181 Proposal documents are
21 exhibit 82.

22
23 **EXHIBIT #82 BUNDLE OF PROJECT #181 PROPOSAL DOCUMENTS,**
24 **BARCODED [FSS.0001.0013.2498], [FSS.0001.0013.2516],**
25 **[FSS.0001.0013.2524] AND [FSS.0001.0013.2544]**

26
27 MR DIEHM: Thank you, Commissioner.

28
29 Q. In that context, then, I will ask you some questions
30 now about the report that you were working on with Mr Hunt
31 and Ms Brisotto in - you think it's 2017. I can assure you
32 there is no controversy, it is 2017, as the documents
33 I will show you in a moment will reveal.

34 A. Okay.

35
36 Q. In your statement, at paragraph 67, you have said that
37 the document, the report that was being generated, was one
38 that might alleviate reporters' concerns?

39 A. Yes.

40
41 Q. The exercise that was being engaged in, I suggest to
42 you, was an analysis of data from samples that had been
43 assessed in the laboratory post the change that was made in
44 August 2016, so that is, these samples had come through and
45 been tested in the laboratory post the change about in
46 August 2016, and analysing that data to extrapolate what
47 would have happened if those samples had been dealt with

1 under the pre-August 2016 regime?
 2 A. Yes.
 3
 4 Q. Now, what I suggest to you happened was that
 5 Ms Brisotto sent an initial draft of a report to you and to
 6 Mr Hunt at least?
 7 A. Yes.
 8
 9 Q. To you two?
 10 A. Yes.
 11
 12 Q. That the two of you, at least the two of you, provided
 13 feedback to Ms Brisotto about that initial draft?
 14 A. Yes.
 15
 16 Q. That Ms Brisotto produced a further draft of the
 17 report --
 18 A. Yes.
 19
 20 Q. -- that sought to incorporate the feedback that you
 21 had provided?
 22 A. Yes.
 23
 24 Q. The two of you had provided?
 25 A. Yes.
 26
 27 Q. And that at that stage, if not earlier than then, she
 28 provided that second draft of the report to yourself,
 29 Mr Hunt, but also to Mr Luke Ryan?
 30 A. Yes.
 31
 32 Q. Because you have said in your statement that you can
 33 recall that at some stage Ms Brisotto said something about
 34 wanting another set of eyes to have a look?
 35 A. Yes.
 36
 37 Q. Now, if the witness can be taken, please, to document
 38 [WIT.0014.0143.0001], and if we can scroll to the second
 39 page, please - I probably shouldn't have done that quite
 40 that way. If we can go back to the first page but to the
 41 bottom of it. Thank you. Now, at the bottom of the page,
 42 we can see there that there is an email from Ms Brisotto to
 43 yourself, Mr Ryan and Mr Hunt on 30 May 2017?
 44 A. Yes.
 45
 46 Q. If we can then scroll to the second page, we can see
 47 the body of the email?

1 A. Yes.

2

3 Q. You will see that Ms Brisotto describes attaching an
4 updated draft of the report?

5 A. Yes.

6

7 Q. And saying:

8

9 *Based on feedback, we are looking at*
10 *a different approach ...*

11

12 et cetera, and then in the next paragraph speaking about
13 how she has taken the feedback and put it into the updated
14 draft?

15 A. Yes, yes.

16

17 Q. So consistent with what you agreed with me about
18 before, there had been an earlier draft, at least you and
19 Mr Hunt had provided feedback, perhaps Mr Ryan as well, but
20 at least the two of you had provided feedback?

21 A. Yes.

22

23 Q. That was synthesised into the draft and sent back to
24 you?

25 A. Yes.

26

27 Q. You will see there that in that second paragraph on
28 that second page, Ms Brisotto says, perhaps in an
29 apologetic way:

30

31 *... I have only had a preliminary read over*
32 *this ... and some of the wording needs to*
33 *change and some paragraphs rearranged to*
34 *make the document flow. It's a work in*
35 *progress.*

36

37 A. Yes.

38

39 Q. And she gives you a Word document and a spreadsheet in
40 case you need to go back and look at those things?

41 A. Yes.

42

43 Q. Do you see that?

44 A. Yes.

45

46 Q. Can we scroll up to the top of the first page, then,
47 please. So on 9 June, you were able to come back to

1 Ms Brisotto with your feedback on this second draft of the
2 report?

3 A. Yes.

4

5 Q. You will see your email response there?

6 A. Yes.

7

8 Q. You say that you "think the report is fine"?

9 A. Yes, but I've added some more feedback in purple.

10

11 Q. And I will take you to that.

12 A. Sorry.

13

14 Q. I'm not trying to trick you into anything. But your
15 initial opening comment is you "think the report is fine"?

16 A. Yes.

17

18 Q. You've added some feedback in purple. You make some
19 further confirming commentary that you think that the
20 report is fine. You raise as a concern some curiosity
21 about why there is still a small set of samples where you
22 are seeing a difference that is too big, no doubt from
23 a scientific point of view, you think that that's some kind
24 of anomaly, and you say:

25

26 *Perhaps we need something in the report to*
27 *highlight this and what we seek to do to*
28 *investigate??*

29

30 So that's the email itself. Do you see that?

31 A. Yes.

32

33 Q. Would you agree with me that that is the contribution
34 that you made to the second draft of the report - that's
35 not being of a state of mind to say that you could not
36 support the assertions and justifications being made in the
37 report?

38 A. No, no. So when I prepared my statement for the
39 Commission, I went back to my memories of what I remembered
40 at the time, and this particular email on the - this one
41 that we're talking about, there's an - I can see that
42 there's an intention that we would go again with another
43 report, adding some more things in there and what have you.

44

45 At the time of me writing my statement for the
46 Commission, because this particular report had gone back
47 and forth and back and forth, in my memory, I'm thinking

1 I don't think it ever got finalised, and I think the reason
2 for that is because I vividly remember having conversations
3 with Matthew Hunt about, you know, "How are we going to" -
4 you know, we wanted to be cooperative with this but also
5 find a balance between making sure that whatever
6 contributions we were making to this we were happy with,
7 and so, like I said in my statement for the Commission, I'm
8 not sure where it ended up.

9
10 THE COMMISSIONER: Do you have a copy of the final report,
11 whatever it is? It's a bit mysterious at the moment to me,
12 Mr Diehm.

13
14 MR DIEHM: There is no final report per se, Commissioner,
15 and the cross-examination will expose that.

16
17 THE COMMISSIONER: Is there a final draft?

18
19 MR DIEHM: There is no final draft. The last two
20 drafts --

21
22 THE COMMISSIONER: I mean a last draft?

23
24 MR DIEHM: No.

25
26 THE COMMISSIONER: Well, there must be - at least this one
27 must have been the last draft.

28
29 MR DIEHM: Well, not quite, because as I will take the
30 witness to, Commissioner, over a bit of time,
31 I appreciate --

32
33 THE COMMISSIONER: Anyway, you have a bit more to go on
34 this thing?

35
36 MR DIEHM: I do, yes, and I will show those documents to
37 you.

38
39 THE COMMISSIONER: Thank you. You carry on.

40
41 MR DIEHM: Q. In short, at the point in time of you
42 sending this email, Ms Rika, to Ms Brisotto, I suggest that
43 you were engaged in an exchange with her, and you had
44 copied in Mr Ryan and Mr Hunt to your email --

45 A. Yes.

46
47 Q. -- and you have attached to your email some edits and

1 comments --

2 A. Yes.

3

4 Q. -- to the draft that Ms Brisotto had sent you. You
5 were engaged in what should be regarded as nothing other
6 than a properly professional exchange on a draft document
7 that you were collaborating on and trying to put together?

8 A. Yes.

9

10 Q. Can I ask you to go then, please, Mr Operator, to
11 [WIT.0014.0144.0001]. This document - and I will give you
12 an opportunity to look at any such part of it as you need
13 to before responding, but this document I suggest is what
14 you attached to your email of 9 June that we've just been
15 looking at, so it's the document in which you incorporated
16 your comments and edits to the document that Ms Brisotto
17 had sent you as the second draft?

18 A. Yes.

19

20 Q. Okay, you can see that. As I say, some of the things
21 you have added are to raise some challenges to some
22 statements that have been made?

23 A. Yes.

24

25 Q. Again, in a thoroughly properly professional,
26 collaborative manner?

27 A. Yes, that's right.

28

29 Q. And others are to suggest additional words?

30 A. Yes.

31

32 Q. Or to make queries about some things that might be
33 looked at beyond that?

34 A. Yes.

35

36 MR DIEHM: Commissioner, perhaps it is convenient at that
37 point if I tender both the email and the attachment.

38

39 THE COMMISSIONER: Yes. Identify the email, would you?

40

41 MR DIEHM: The email is from Ms Rika to Ms Brisotto and
42 others, dated 9 June 2017 at 1.14pm.

43

44 THE COMMISSIONER: That's exhibit 83.

45

46 **EXHIBIT #83 EMAIL FROM MS RIKA TO MS BRISOTTO AND OTHERS,**
47 **DATED 9 JUNE 2017 AT 1.14PM, BARCODED [WIT.0014.0143.0001]**

1
2 THE COMMISSIONER: Did you want to tender the draft report
3 of May 2017?

4
5 MR DIEHM: Yes, either as part of that exhibit or
6 a a separate document.

7
8 THE COMMISSIONER: I will make it separate. The draft
9 report concerning zero spermatozoa, dated May 2017, is
10 exhibit 84.

11
12 **EXHIBIT #84 DRAFT REPORT CONCERNING ZERO SPERMATOZOA,**
13 **DATED MAY 2017, BARCODED [WIT.0014.0144.0001]**

14
15 MR DIEHM: Thank you, Commissioner.

16
17 Q. The next document I wanted to take you to, then,
18 Ms Rika, is, if it may be put on the screen,
19 [WIT.0014.0145.0001]. Now, no doubt under the pressures of
20 time, Mr Hunt is running a little further behind in terms
21 of being able to come back with his feedback. As you can
22 see, there is an email there from him on 1 August 2017?

23 A. Yes.

24
25 Q. Sent to Ms Brisotto, Mr Ryan and yourself?

26 A. Yes.

27
28 Q. You will see that the subject and the attachments
29 indicate that it is the "Data Analysis report_draft1", and
30 I will come to the document itself that was attached in a
31 few moments, but it shows both LBR track changes and MOH
32 track changes?

33 A. Yes.

34
35 Q. You would understand that, just looking at that at
36 face value, to be track changes introduced by both Mr Ryan
37 and Mr Hunt?

38 A. Yes.

39
40 Q. The email itself offers his apology for the time that
41 has been taken and offers to discuss matters?

42 A. Yes.

43
44 Q. If I can then ask to be put on the screen, please,
45 document [WIT.0014.0146.0001]. So this is the document
46 that contains - you may recognise it; I ask you if you do,
47 again looking at as many of the pages as you need to - the

1 edits that were made by striking through and by underlining
2 newly introduced parts, otherwise tracking changes, to the
3 draft that had been sent by Ms Brisotto - not to your
4 draft, but to the draft sent by Ms Brisotto that Mr Hunt
5 and Mr Ryan had put together?

6 A. Yes, that looks like it.

7
8 MR DIEHM: Commissioner, that's why I said, no, there's
9 not a single draft; there are two last drafts, as it were.

10
11 THE COMMISSIONER: I see, thank you. Do you want to
12 tender that one?

13
14 MR DIEHM: Yes, I do, thank you, both the email and the
15 draft report.

16
17 THE COMMISSIONER: The email from Mr Hunt to Ms Brisotto
18 on 1 August 2017 at 9.51 is exhibit 85.

19
20 **EXHIBIT #85 EMAIL FROM MR HUNT TO MS BRISOTTO, DATED**
21 **1 AUGUST 2017 AT 9.51AM, BARCODED [WIT.0014.0145.0001]**

22
23 THE COMMISSIONER: The draft report - that's as amended by
24 Mr Hunt, isn't it?

25
26 MR DIEHM: Mr Hunt and Mr Ryan.

27
28 THE COMMISSIONER: -- as amended by Mr Hunt and Mr Ryan is
29 exhibit 86.

30
31 **EXHIBIT #86 DRAFT REPORT AS AMENDED BY MR HUNT AND MR RYAN,**
32 **BARCODED [WIT.0014.0146.0001]**

33
34 MR DIEHM: Thank you.

35
36 Q. It would be consistent, having had your memory
37 refreshed to the extent I've been able to do so far with
38 these documents - it would be consistent with your
39 recollection that there were no further versions of that
40 document that were produced ultimately?

41 A. That's right.

42
43 Q. Having regard to the timeline of the development of
44 Project #181, we are by then at the stage - we've gone past
45 the point in time of Part 2 of Project #181 - because that
46 was, as I took you to before, approved by the management
47 committee in early May 2017, so by the time of both your

1 feedback to the second draft and as well as that of the
2 other two contributors, we're now three months past the
3 approval for Part 2 of Project #181.
4

5 Leave aside what else may have happened in
6 Ms Brisotto's hands that you are not to know anything about
7 with respect to the development of that paper or steps
8 taken towards the conclusion of that paper, I suggest to
9 you that for the limited purpose that that paper was being
10 worked upon, it had really become redundant in the sense
11 that Project #181, that forward-looking project about how
12 are we going to deal with this in the future, was really
13 taking over the ground?

14 A. Yes.
15

16 Q. The matter was something that you were involved in
17 communications with at a subsequent time, which I will take
18 you to now. If I can ask, please, if document
19 [WIT.0014.0147.0001] can be put on the screen. I have
20 obviously given a wrong number.
21

22 THE COMMISSIONER: Is the point of this, Mr Diehm, that
23 the need for this report to be finalised evaporated because
24 of the progress of the other project?
25

26 MR DIEHM: Yes, that's so.
27

28 THE COMMISSIONER: And so that's step one - that will
29 explain why Ms Rika never heard anything more about it; is
30 that right?
31

32 MR DIEHM: Subject to what's discussed in 2020 at the time
33 of the conclusion, which I'm about to come to, but that is
34 the point of what I have said to date.
35

36 THE COMMISSIONER: I don't know that you have put that
37 directly to Ms Rika, but it sounds like she will agree - or
38 has she agreed with you?
39

40 MR DIEHM: I think she did just agree to that, yes.
41

42 THE COMMISSIONER: All right. And then the second part
43 is, Ms Rika says that the last time she dealt with the
44 report, it was at a point where she would not have
45 supported the report in that form because of some things
46 that had been said in it which she didn't agree with, and
47 you haven't touched upon that yet, I don't think.

1
2 MR DIEHM: Thank you, Commissioner. I will round that
3 point out.
4

5 Q. Ms Rika, having regard to what you have said in
6 paragraph 67 of your statement, and appreciating what you
7 have told the Commission here this afternoon, that at the
8 time that you prepared this statement, particularly on this
9 topic, you were trying to recall what you could about these
10 matters, you would accept, I take it, that there obviously
11 were quite a few things that went on that are different
12 than the way you were recalling them at the time that you
13 prepared that part of your statement, paragraph 67?

14 A. Quite likely, yes.
15

16 Q. If the report stopped in that way, in the sense that
17 it became redundant, at that point in time where there was
18 this professional collaboration going on and exchange of
19 ideas, it wasn't the case that you, or for that matter
20 Mr Hunt, could not support the assertions and
21 justifications being made in the report, because the
22 process hadn't been finished yet?

23 A. So the last version of the report that I saw, how that
24 stood, I couldn't support the assertions and
25 justifications.
26

27 Q. But all that means is that you still had more to
28 contribute that you wanted to be brought to account in the
29 way in which the report was finally drafted?

30 A. Yes.
31

32 THE COMMISSIONER: Q. Is this what happened, Ms Rika:
33 you and Mr Hunt and Ms Brisotto were collaborating on this
34 report, and the final version that you saw was one to which
35 you added amendments?

36 A. Yes.
37

38 Q. Which were significant and substantial and would have
39 required Ms Brisotto's agreement as a collaborator to go
40 ahead; you never got that agreement?

41 A. No.
42

43 Q. And that was the last version of the report that you
44 saw?

45 A. Yes.
46

47 Q. But it appears now that the reason why your objection

1 to the report in its ultimate form that you saw - the
2 reason why your final contribution was never addressed was
3 that Ms Brisotto abandoned the project for the reasons
4 Mr Diehm's putting forward. Does that sound right?

5 A. Yes.

6
7 MR DIEHM: Thank you, Commissioner.

8
9 Q. And in terms of Mr Hunt in that process, he had made
10 his own contributions, separate to yours, maybe involving
11 some common themes but involving other ideas as well?

12 A. Yes, that's right.

13
14 Q. So, if the report was ever going to be finished, the
15 three of you, plus Mr Ryan, would have needed to have
16 reached a common state of mind, but that was never tested?

17 A. That's right, yes.

18
19 Q. Now, that was the right document number, Commissioner,
20 that I mentioned before in terms of the 2020 email, so
21 perhaps if that can be put back up, it is
22 [WIT.0014.0147.0001], but it was just that we need to
23 scroll down a little further, and if I can ask if we can go
24 down in the email to an email from Ms Rika of 3 July 2020,
25 so it should be on the fourth page, I think, of the
26 document. I'm sorry, there is a lot of redaction needing
27 to go on there, I appreciate. You can see there that the
28 earlier emails are the ones I've just taken you to in terms
29 of your response with feedback. So on the screen there is
30 an email, the text of which we can just see between those
31 redactions now. The email at the bottom of the page -
32 you're responding, I suggest, in an email on 3 July 2020 at
33 10.11am, that you have sent to the people who are the
34 project authors for Project #181, and that includes
35 Ms Brisotto; Mr Hunt by that stage had become one of the
36 project authors for 181, had he not?

37 A. Yes.

38
39 Q. And you are being called upon to provide feedback to
40 the draft report that was ultimately to be released for
41 Project #181, and you mention there in your email that back
42 in 2017 there had been four of you that had done a lot of
43 work looking at a set of samples, and you ask whether that
44 body of work could be included somewhere, as you thought it
45 captured a lot of the thoughts that went into the
46 subsequent actions.

47 A. Yes.

1
2 Q. So by "the subsequent actions", do you mean the way in
3 which the problem that had emerged prior to the
4 change-around in August 2016 was managed thereafter, but
5 also the way in which issues were investigated through
6 Project #181?

7 A. I actually can't remember - sorry, I can't see the
8 last - my email.

9
10 Q. Sorry, it is at the bottom of the page. Perhaps if
11 that could be highlighted, the part that has a bit of
12 yellow highlighting at the very bottom. Thank you.

13 A. Okay, yes. I see what you are saying, yes.

14
15 Q. Do you think that what you were referring to about
16 that body of work being done capturing a lot of thoughts
17 that went into subsequent actions --

18 A. Yes.

19
20 Q. -- is that it went into actions either in terms of
21 managing the issue in the laboratory and/or thoughts with
22 respect to Project #181 and how it was pursued?

23 A. I think what I may have meant by that was because of
24 the - what we had seen through the data analysis and also
25 my feedback and Matthew Hunt's feedback and Luke's feedback
26 and all of those thoughts and discussions, I think a lot of
27 that helped to potentially drive Project #181, in terms of
28 the - you know, there were - I think you said there were
29 four parts?

30
31 Q. Four parts, yes.

32 A. So it helped to make the project staff on Project #181
33 think, okay, well, if we're going to test this part now,
34 and then this part and then this part, for all the four
35 parts of the Project #181, we need to - my thought in my
36 email probably was that part of how Project #181 developed
37 was probably because of things that we had thought of as
38 part of our toing-and-froing in the discussions of that
39 data analysis draft report.

40
41 Q. That is despite that part 1 and part 2 of the design
42 of Project #181 preceded the discussions that we've been
43 just looking at in June through to August 2017?

44 A. Yes, so maybe it was parts 3 and 4, yes.

45
46 Q. In any case, it's not that that data and the analysis
47 was part of Project #181, but just that you thought that it

1 might have had some role in some of the things that were
2 being explored?

3 A. Yes.

4
5 Q. If we can return to the email body and then scroll up
6 to Ms Brisotto's reply on 3 July at 11.45am, so that's
7 between the two redacted boxes, I think - yes, sorry, down
8 a little further, down on the fourth page of the document,
9 up from there, sorry. In that section between those two
10 large redacted boxes, if that can be highlighted and lifted
11 up. So there is Ms Brisotto's response on the same day, an
12 hour or so later, to all those people in your original
13 email, and she offers her explanation as to why she thought
14 that that data shouldn't be included and she makes the
15 observation that that work had not been completed, she
16 thought that it wasn't part of the project discussions and
17 that there was a significant amount of work to do on that
18 document if it were to be completed. Do you see that?

19 A. Yes.

20
21 Q. You respond, if we go to the top of that page --

22
23 THE COMMISSIONER: Mr Diehm, is your intent to establish
24 that the cessation of work on that document that Ms Rika
25 and Ms Brisotto were developing was due to extraneous
26 matters, and that it wouldn't be right to conclude that
27 Ms Brisotto reacted to Ms Rika's suggestions by cutting her
28 out of the process? Is that the point?

29
30 MR DIEHM: That is the point, yes.

31
32 THE COMMISSIONER: Is there any other point?

33
34 MR DIEHM: No.

35
36 THE COMMISSIONER: You have established that.

37
38 MR DIEHM: Thank you, Commissioner. I won't take it any
39 further.

40
41 THE COMMISSIONER: I don't think you need to.

42
43 MR DIEHM: I appreciate your indication. Commissioner,
44 given that I have asked the witness questions about the
45 document, should I tender the document?

46
47 THE COMMISSIONER: Yes, it will be helpful if it is in

1 evidence and I can refer to it in due course, yes.

2
3 In writing the report, so all of you know, I will only
4 be considering evidence. So we've got a lot of
5 information, as you are aware, in the form of many, many
6 documents, and I will only be considering what you have
7 been notified is evidence. So if there are documents that
8 witnesses have not yet spoken about, we will have to give
9 you notice of those documents in one form or another,
10 whether it's by tendering a bundle at the hearing or after
11 the hearing by some other means, but that's the way in
12 which I propose to identify the material to which you
13 should have regard, because that's the only material to
14 which I will have regard. Now, if there is a better system
15 or some alternate means that you want, you can think about
16 it and let me know in due course.

17
18 MR DIEHM: Thank you, Commissioner.

19
20 THE COMMISSIONER: It seems to me that some method has to
21 be developed so that you know what you have to address and
22 what you don't have to address.

23
24 MR DIEHM: Thank you.

25
26 THE COMMISSIONER: Is there anything else before we
27 adjourn?

28
29 MR HUNTER: Just to clarify the question that you asked me
30 earlier, Commissioner. The issue of the change in
31 procedure regarding sampling is addressed in
32 Inspector Neville's first statement at paragraphs 75 to 83.

33
34 THE COMMISSIONER: Thank you.

35
36 MR HUNTER: I think I inadvertently described him as
37 a scenes of crime officer, when of course he was
38 a scientific officer.

39
40 THE COMMISSIONER: Ms Hedge, is Ms Rika the last witness
41 this week or do you have somebody coming tomorrow as well?

42
43 MS HEDGE: We have Dr Duncan Taylor, the validations
44 expert, giving evidence tomorrow morning by videolink. So
45 I wonder whether we might be able to get an indication of
46 how long everyone who is left will be with Ms Rika. We
47 have that videolink currently set up for 9.30 in the

1 morning, but that's not going to work, so --
2
3 THE COMMISSIONER: Well, no, we can interpose, if he has
4 other commitments, depending upon Ms Rika's --
5
6 MS HEDGE: Perhaps we could get an indication of how long
7 things will be.
8
9 THE COMMISSIONER: Let's do that now.
10
11 MR DIEHM: I have finished, Commissioner.
12
13 MR RICE: Nothing from me.
14
15 THE COMMISSIONER: Nothing?
16
17 MS COOPER: No.
18
19 MS MCKENZIE: Nothing from me.
20
21 THE COMMISSIONER: Mr Hickey?
22
23 MR HICKEY: Commissioner I'm notoriously poor at
24 estimating how long things might take. I expect it might
25 be an hour or so.
26
27 THE COMMISSIONER: Not a brief cross-examination, then,
28 but not a very lengthy one either.
29
30 MS HEDGE: I will make some inquiries as to which order --
31
32 THE COMMISSIONER: Speak to Mr Hickey, and find out what
33 Ms Rika's commitments are. We can start with the expert
34 first thing or later, whatever. It doesn't worry me.
35
36 MR HICKEY: Commissioner, can I signal, I'm perfectly
37 content with whatever is most convenient to Ms Rika and to
38 Dr Taylor.
39
40 THE COMMISSIONER: I will leave it to you at the Bar table
41 to sort it out and let me know.
42
43 MS HEDGE: Thank you. And Dr Taylor is the last witness
44 for the week.
45
46 THE COMMISSIONER: Thank you. Ms Rika, you will have come
47 back tomorrow. I am not sure at what time. You can talk

1 to Ms Hedge about that. Adjourn until tomorrow at 9.30.
2 Do we need 9.30?

3
4 MS HEDGE: That would be convenient, thank you.

5
6 THE COMMISSIONER: 9.30 it is, then.

7
8 **AT 4.40PM THE COMMISSION WAS ADJOURNED TO**
9 **FRIDAY, 14 OCTOBER 2022 AT 9.30AM**

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47

#	14 [1] - 1401:9	2015 [13] - 1291:2, 1292:40, 1292:46, 1293:1, 1293:9, 1293:15, 1293:18, 1293:24, 1320:43, 1321:19, 1332:47, 1334:5, 1362:34	3	58 [1] - 1337:46
#181 [32] - 1290:42, 1293:39, 1365:12, 1365:21, 1366:5, 1366:6, 1368:17, 1369:35, 1369:38, 1382:18, 1382:38, 1382:43, 1384:6, 1385:4, 1386:14, 1386:18, 1386:20, 1386:23, 1393:44, 1393:45, 1394:3, 1394:11, 1396:34, 1396:41, 1397:6, 1397:22, 1397:27, 1397:32, 1397:35, 1397:36, 1397:42, 1397:47	15 [17] - 1313:46, 1314:41, 1315:2, 1315:6, 1315:8, 1315:10, 1315:11, 1315:12, 1315:21, 1315:24, 1319:36, 1319:40, 1330:46, 1331:34, 1331:42, 1332:5, 1332:6	2016 [31] - 1292:16, 1292:45, 1293:10, 1293:19, 1321:19, 1362:34, 1362:38, 1363:45, 1365:18, 1366:32, 1366:39, 1367:37, 1367:45, 1368:1, 1368:4, 1368:9, 1368:12, 1368:44, 1368:45, 1369:23, 1370:14, 1382:16, 1382:24, 1382:29, 1382:44, 1383:2, 1383:8, 1386:44, 1386:46, 1387:1, 1397:4	3 [9] - 1363:42, 1385:4, 1385:8, 1385:9, 1385:34, 1396:24, 1396:32, 1397:44, 1398:6	6
#77 [1] - 1267:38	16 [4] - 1270:4, 1343:9, 1383:13, 1383:24	2017 [19] - 1371:2, 1382:3, 1382:4, 1384:7, 1384:12, 1386:31, 1386:32, 1387:43, 1391:42, 1391:47, 1392:3, 1392:9, 1392:13, 1392:22, 1393:18, 1393:21, 1393:47, 1396:42, 1397:43	30 [9] - 1276:24, 1303:12, 1319:36, 1373:39, 1373:43, 1376:33, 1377:19, 1379:5, 1387:43	6 [12] - 1267:4, 1267:8, 1267:25, 1267:38, 1274:3, 1275:20, 1276:26, 1280:19, 1304:3, 1313:16, 1313:38, 1351:28
#78 [1] - 1351:28	16-03-2017 [1] - 1384:25	2018 [17] - 1268:12, 1268:21, 1268:24, 1268:32, 1273:47, 1296:13, 1312:21, 1313:11, 1352:19, 1372:10, 1376:1, 1376:33, 1377:19, 1377:21, 1377:25, 1385:5, 1385:9	30(b) [1] - 1267:31	60 [2] - 1362:36, 1381:47
#79 [1] - 1367:47	17 [3] - 1277:16, 1284:18, 1284:19	2019 [2] - 1385:31, 1385:36	30(c) [1] - 1267:31	60-plus [1] - 1308:36
#80 [1] - 1368:8	18 [1] - 1328:38	2020 [9] - 1293:40, 1307:47, 1365:13, 1370:41, 1386:5, 1394:32, 1396:20, 1396:24, 1396:32	31 [4] - 1360:38, 1361:5, 1377:21, 1377:25	63 [1] - 1284:44
#81 [1] - 1377:24	181 [1] - 1396:36	2022 [6] - 1265:20, 1267:39, 1270:4, 1278:12, 1351:29, 1401:9	32(b) [2] - 1267:10, 1267:31	64 [1] - 1363:2
#82 [1] - 1386:23	19 [4] - 1278:22, 1286:29, 1328:35, 1328:42	28 [8] - 1355:44, 1361:4, 1366:38, 1368:4, 1368:9, 1368:12, 1383:15, 1383:31	32(c) [2] - 1267:10, 1267:32	66 [1] - 1343:41
#83 [1] - 1391:46	2	2pm [1] - 1367:9	32(d) [1] - 1267:8	67 [6] - 1370:45, 1382:2, 1382:8, 1386:36, 1395:6, 1395:13
#84 [1] - 1392:12	2 [15] - 1268:21, 1274:33, 1276:9, 1305:19, 1315:40, 1322:11, 1351:19, 1362:14, 1367:8, 1378:26, 1384:5, 1384:11, 1393:45, 1394:3, 1397:41		35 [9] - 1278:35, 1278:40, 1314:41, 1315:1, 1315:21, 1316:5, 1316:7, 1316:13, 1319:40	68 [1] - 1381:45
#85 [1] - 1393:20	2.30 [1] - 1350:39		36 [1] - 1273:40	
#86 [1] - 1393:31	2.37pm [1] - 1351:3		39 [2] - 1329:22, 1329:24	
0	20 [7] - 1270:2, 1278:12, 1342:2, 1366:32, 1367:37, 1367:45, 1368:1		4	
0.001 [1] - 1268:25	2004 [1] - 1267:43		4 [6] - 1305:5, 1324:1, 1363:42, 1385:16, 1385:39, 1397:44	
0.0088ng/μL [1] - 1268:26	2005 [3] - 1338:24, 1359:31, 1359:39		4.40PM [1] - 1401:8	
1	2006 [3] - 1342:28, 1359:30, 1359:33		41 [1] - 1330:44	
1 [9] - 1362:14, 1363:40, 1366:27, 1367:7, 1385:40, 1392:22, 1393:18, 1393:21, 1397:41	2007 [4] - 1267:47, 1285:27, 1285:28, 1342:28		43 [3] - 1278:26, 1278:30, 1281:39	
1.14pm [1] - 1391:42	2008 [23] - 1283:1, 1284:7, 1290:2, 1290:9, 1319:18, 1345:24, 1345:32, 1346:2, 1352:23, 1352:25, 1352:28, 1352:38, 1353:2, 1353:5, 1354:4, 1355:44, 1359:10, 1359:39, 1360:9, 1360:17, 1360:22, 1378:47, 1380:38		44 [3] - 1293:5, 1320:30, 1320:42	
1.14PM [1] - 1391:47			45 [2] - 1291:15, 1320:47	
10 [4] - 1283:2, 1296:7, 1315:41, 1352:14			47 [1] - 1321:5	
10.11am [1] - 1396:33			49 [1] - 1332:13	
100 [1] - 1276:39			5	
11 [3] - 1315:43, 1362:35, 1381:46			5 [3] - 1304:2, 1304:3, 1308:17	
11.45am [1] - 1398:6			50 [1] - 1314:46	
12 [7] - 1311:28, 1315:41, 1315:46, 1316:46, 1381:12, 1381:45, 1382:1			53 [1] - 1355:43	
13 [5] - 1265:20, 1268:21, 1372:14, 1373:12, 1383:2			54 [4] - 1296:36, 1332:39, 1355:43, 1355:44	
			55 [2] - 1299:17, 1334:9	
			56 [3] - 1283:1, 1352:14, 1354:43	

9	1311:41, 1341:33, 1378:28, 1381:43	1300:37	ahead [4] - 1272:47, 1337:18, 1345:18, 1395:40	1300:32, 1305:27, 1381:23
9 [7] - 1292:16, 1321:19, 1351:38, 1388:47, 1391:14, 1391:42, 1391:47	Act [1] - 1272:24	adopt [1] - 1308:40	Alan [4] - 1340:9, 1349:16, 1375:11, 1376:12	almost [3] - 1295:27, 1356:24, 1366:2
9.30 [4] - 1399:47, 1401:1, 1401:2, 1401:6	acted [3] - 1296:33, 1346:2, 1347:18	adopted [3] - 1300:38, 1348:31, 1370:29	Alanna [1] - 1266:21	alone [1] - 1330:34
9.30am [1] - 1265:20	acting [7] - 1279:33, 1309:11, 1334:38, 1353:14, 1353:16, 1372:3	advance [4] - 1279:21, 1282:8, 1282:10, 1304:37	alarm [1] - 1291:12	altercation [3] - 1292:17, 1334:12, 1334:15
9.30AM [1] - 1401:9	action [11] - 1273:5, 1273:8, 1273:12, 1284:46, 1291:43, 1292:35, 1298:38, 1303:28, 1308:18, 1308:29, 1308:45	adversely [1] - 1272:39	alarmed [3] - 1269:6, 1321:28, 1321:33	alternate [1] - 1399:15
9.37am [1] - 1266:30	actions [5] - 1342:33, 1396:46, 1397:2, 1397:17, 1397:20	advised [2] - 1277:23, 1364:7	alarming [2] - 1301:29, 1301:31	AMANDA [1] - 1368:8
9.51 [1] - 1393:18	acts [5] - 1347:28, 1347:31, 1347:32, 1347:37, 1347:38	advocate [1] - 1373:14	Alcove [12] - 1284:30, 1284:37, 1286:27, 1288:30, 1288:38, 1289:2, 1299:32, 1337:47, 1343:41, 1344:15, 1351:47, 1352:37	Amanda [47] - 1290:25, 1292:5, 1292:8, 1292:17, 1293:36, 1296:37, 1297:3, 1297:42, 1298:47, 1299:6, 1299:34, 1301:9, 1302:41, 1306:16, 1307:6, 1307:9, 1307:19, 1310:34, 1321:9, 1321:28, 1321:37, 1332:42, 1333:6, 1334:4, 1334:12, 1334:17, 1334:24, 1335:35, 1336:13, 1336:20, 1336:24, 1336:27, 1337:8, 1347:25, 1353:12, 1353:15, 1355:17, 1362:39, 1363:26, 1366:38, 1368:3, 1373:17, 1373:21, 1373:24, 1375:32, 1375:44, 1375:45
9.51AM [1] - 1393:21	ad [2] - 1352:7, 1352:9	affected [6] - 1288:10, 1289:18, 1289:34, 1302:14, 1354:13, 1354:19	all-encompassing [1] - 1348:30	Amanda's [5] - 1302:32, 1307:18, 1334:42, 1335:10
A	add [1] - 1296:11	affectionately [1] - 1300:39	ALLAN [1] - 1367:47	amazing [1] - 1361:20
abandoned [3] - 1295:4, 1295:47, 1396:3	added [9] - 1269:36, 1329:2, 1329:4, 1329:5, 1329:8, 1389:9, 1389:18, 1391:21, 1395:35	affirmed [1] - 1266:30	Allan [14] - 1266:20, 1292:17, 1323:19, 1323:32, 1334:12, 1334:16, 1343:37, 1363:35, 1367:22, 1367:42, 1368:13, 1368:16, 1368:47, 1369:15	ameliorate [1] - 1343:16
abilities [1] - 1287:34	address [10] - 1282:12, 1287:43, 1290:38, 1304:37, 1330:8, 1331:10, 1354:15, 1364:15, 1399:21, 1399:22	afford [1] - 1302:43	allegation [2] - 1325:47, 1371:30	amended [2] - 1393:23, 1393:28
able [12] - 1270:14, 1273:8, 1276:35, 1277:5, 1313:35, 1316:34, 1371:41, 1382:11, 1388:47, 1392:21, 1393:37, 1399:45	addition [1] - 1330:34	afresh [1] - 1358:18	alleged [2] - 1347:29, 1379:47	AMENDED [1] - 1393:31
abreast [1] - 1331:20	additional [6] - 1375:3, 1384:22, 1384:30, 1385:20, 1385:43, 1391:29	aftermath [2] - 1304:33, 1334:13	Allen [32] - 1277:24, 1277:27, 1278:11, 1308:1, 1311:38, 1311:46, 1313:4, 1320:31, 1325:42, 1325:47, 1326:38, 1327:22, 1328:16, 1330:22, 1330:24, 1330:33, 1340:5, 1340:11, 1340:36, 1340:40, 1342:28, 1343:10, 1347:12, 1347:23, 1349:15, 1355:45, 1356:7, 1359:10, 1369:5, 1372:10, 1372:22, 1376:5	amendments [1] - 1395:35
abrupt [1] - 1326:21	addressed [14] - 1279:37, 1282:11, 1284:15, 1310:25, 1328:1, 1330:18, 1335:46, 1363:8, 1363:12, 1363:17, 1365:10, 1365:17, 1396:2, 1399:31	afternoon [1] - 1395:7	Allen's [1] - 1327:3	amount [1] - 1398:17
absence [2] - 1371:45, 1371:46	addressing [1] - 1330:19	afterwards [5] - 1272:5, 1335:5, 1340:26, 1349:8, 1349:35	alleviate [1] - 1386:38	amp [3] - 1276:15, 1279:43, 1279:44
absolutely [16] - 1271:5, 1273:15, 1275:4, 1281:32, 1287:11, 1288:18, 1297:1, 1298:22, 1299:40, 1303:2, 1303:41, 1304:36, 1326:27, 1333:34, 1343:46	adequate [1] - 1288:43	aggression [2] - 1326:19, 1343:20	allow [2] - 1379:21, 1380:18	amped [1] - 1313:17
absent [1] - 1371:45, 1371:46	adhere [1] - 1346:24	aggressive [6] - 1275:32, 1325:46, 1326:16, 1343:4, 1343:18, 1350:19	allowed [4] - 1278:42,	amping [1] - 1313:12
absolutely [16] - 1271:5, 1273:15, 1275:4, 1281:32, 1287:11, 1288:18, 1297:1, 1298:22, 1299:40, 1303:2, 1303:41, 1304:36, 1326:27, 1333:34, 1343:46	adjourn [3] - 1311:27, 1399:27, 1401:1	ago [3] - 1343:40, 1351:15, 1361:43		amplification [6] - 1268:28, 1274:3, 1276:26, 1315:7, 1316:12
absolutely [16] - 1271:5, 1273:15, 1275:4, 1281:32, 1287:11, 1288:18, 1297:1, 1298:22, 1299:40, 1303:2, 1303:41, 1304:36, 1326:27, 1333:34, 1343:46	administrative [1] -	agree [23] - 1280:23, 1280:24, 1301:32, 1327:8, 1327:31, 1330:3, 1330:11, 1330:27, 1332:30, 1341:9, 1341:21, 1341:24, 1341:34, 1343:15, 1345:36, 1345:39, 1346:21, 1379:30, 1384:36, 1389:33, 1394:37, 1394:40, 1394:46		amplifications [1] - 1316:8
absolutely [16] - 1271:5, 1273:15, 1275:4, 1281:32, 1287:11, 1288:18, 1297:1, 1298:22, 1299:40, 1303:2, 1303:41, 1304:36, 1326:27, 1333:34, 1343:46		agreed [6] - 1346:24, 1384:22, 1385:20, 1385:43, 1388:17, 1394:38		amplify [1] - 1316:34
absolutely [16] - 1271:5, 1273:15, 1275:4, 1281:32, 1287:11, 1288:18, 1297:1, 1298:22, 1299:40, 1303:2, 1303:41, 1304:36, 1326:27, 1333:34, 1343:46		agreement [2] - 1395:39, 1395:40		amplifying [1] -

1274:37	1359:39	1281:32, 1312:5,	1327:44, 1327:47,	automatically [1] -
analyse [1] - 1277:34	apologise [1] -	1312:47, 1313:1,	1328:13, 1328:31	1312:21
analysed [1] - 1291:18	1299:42	1329:47, 1330:12,	assuming [2] -	automicrocon [1] -
analysing [2] -	apologised [1] -	1330:23, 1330:24,	1305:44, 1342:46	1268:27
1283:32, 1386:46	1342:32	1330:27	assumption [6] -	available [1] - 1279:10
analysis [12] -	apology [1] - 1392:40	areas [3] - 1300:5,	1291:9, 1321:40,	avenue [2] - 1309:38,
1267:41, 1274:29,	apparent [1] - 1318:14	1308:17, 1315:2	1328:15, 1328:17,	1326:34
1294:4, 1294:18,	appear [5] - 1266:5,	arisen [1] - 1368:46	1328:18, 1328:27	aware [47] - 1269:31,
1300:6, 1360:47,	1266:12, 1320:31,	arose [3] - 1291:2,	assure [1] - 1386:31	1271:26, 1271:42,
1370:46, 1373:18,	1324:5, 1348:34	1351:43, 1362:34	AT [4] - 1391:47,	1272:6, 1272:21,
1386:42, 1397:24,	appeared [3] -	arrived [2] - 1273:41,	1393:21, 1401:8,	1272:31, 1272:43,
1397:39, 1397:46	1269:25, 1299:1,	1273:42	1401:9	1272:45, 1273:42,
Analysis [4] -	1329:27	arriving [1] - 1270:45	attached [6] -	1282:4, 1282:13,
1307:43, 1308:17,	appearing [4] -	articles [1] - 1381:13	1279:22, 1307:47,	1283:22, 1284:17,
1308:26, 1392:29	1318:26, 1318:27,	AS [1] - 1393:31	1376:30, 1390:47,	1284:25, 1289:19,
analytical [6] -	1360:1	aside [2] - 1336:29,	1391:14, 1392:30	1289:39, 1289:41,
1269:22, 1269:24,	appetite [1] - 1299:28	1394:5	attaching [1] - 1388:3	1292:3, 1292:16,
1280:26, 1280:34,	applicable [1] -	aspect [1] - 1337:10	attachment [1] -	1293:33, 1296:25,
1281:7, 1353:26	1318:38	aspects [1] - 1348:24	1391:37	1306:39, 1306:43,
AND [4] - 1368:8,	applied [3] - 1278:36,	assault [5] - 1281:8,	attachments [1] -	1306:46, 1313:14,
1386:25, 1391:46,	1298:38, 1347:13	1289:43, 1289:46,	1392:28	1313:16, 1313:42,
1393:31	apply [2] - 1316:27,	1291:5, 1332:46	attempt [5] - 1320:39,	1314:7, 1314:17,
Andria [3] - 1301:38,	1381:23	assembled [3] -	1324:16, 1343:16,	1314:22, 1317:35,
1377:34, 1377:44	appreciate [3] -	1341:6, 1341:13,	1347:12, 1373:9	1323:1, 1328:2,
Angelina [2] -	1390:31, 1396:27,	1341:17	attempted [1] -	1330:1, 1330:32,
1323:36, 1350:11	1398:43	assertions [6] -	1311:37	1331:7, 1331:14,
annexed [1] - 1290:8	appreciating [1] -	1371:10, 1371:13,	attempting [2] -	1331:39, 1337:43,
announced [3] -	1395:6	1371:16, 1389:36,	1324:26, 1337:5	1340:21, 1340:25,
1273:25, 1310:18,	apprehended [1] -	1395:20, 1395:24	attempts [1] - 1347:22	1340:26, 1340:40,
1326:42	1345:47	assess [1] - 1294:15	attend [2] - 1304:7,	1369:6, 1372:45,
annoyance [1] -	approach [20] -	assessed [2] -	1372:16	1376:42, 1399:5
1343:3	1276:6, 1280:8,	1318:34, 1386:43	attended [1] - 1305:31	awkward [1] - 1344:22
annoyed [1] - 1329:27	1281:24, 1281:29,	assessment [2] -	attending [1] -	
anomaly [6] - 1318:15,	1308:2, 1315:15,	1280:10, 1286:23	1354:26	B
1318:18, 1318:20,	1316:2, 1316:33,	assessments [1] -	attention [4] - 1269:7,	Bachelor [1] - 1266:39
1318:24, 1319:2,	1316:38, 1316:47,	1281:35	1327:3, 1351:44,	background [1] -
1389:24	1318:4, 1319:8,	assigned [3] -	1352:1	1299:39
answer [11] - 1327:28,	1319:22, 1327:5,	1353:29, 1354:8,	attitude [1] - 1324:24	backlash [1] - 1311:16
1334:2, 1339:22,	1348:26, 1360:1,	1354:14	AUGUST [1] - 1393:21	bacterial [1] - 1318:16
1341:24, 1346:35,	1360:2, 1360:44,	assist [4] - 1323:12,	August [19] - 1278:22,	badly [1] - 1375:43
1347:40, 1361:25,	1388:10	1347:42, 1366:21,	1292:24, 1293:9,	balance [1] - 1390:5
1361:32, 1361:45,	approached [6] -	1380:33	1293:19, 1363:45,	balanced [1] -
1366:11, 1374:36	1288:24, 1302:5,	assistance [2] -	1365:18, 1368:44,	1362:18
answered [4] -	1307:1, 1309:13,	1350:33, 1372:35	1369:23, 1370:29,	Bar [1] - 1400:40
1282:27, 1282:40,	1310:28, 1349:30	assisting [2] - 1346:6,	1382:44, 1383:13,	BARCODED [10] -
1291:35, 1340:17	approaching [2] -	1382:15	1383:24, 1386:44,	1267:39, 1351:29,
answering [1] -	1303:7, 1343:10	Assisting [1] -	1386:46, 1387:1,	1368:1, 1368:9,
1317:38	appropriate [8] -	1265:30	1392:22, 1393:18,	1377:25, 1386:24,
answers [2] - 1330:17,	1278:39, 1288:33,	assists [2] - 1274:26,	1397:4, 1397:43	1391:47, 1392:13,
1346:10	1292:34, 1302:30,	1325:37	Australia [1] - 1320:12	1393:21, 1393:32
anticipated [1] -	1319:40, 1345:42,	associated [2] -	author [1] - 1296:28	based [11] - 1272:1,
1347:40	1354:45, 1380:38	1283:11, 1299:3	authors [2] - 1396:34,	1280:10, 1290:21,
anxious [1] - 1299:33	appropriately [2] -	associating [1] -	1396:36	1316:14, 1329:35,
anyway [3] - 1278:18,	1363:5, 1363:17	1298:47	auto [3] - 1268:37,	1330:27, 1335:4,
1371:23, 1390:33	approval [1] - 1394:3	assume [7] - 1330:15,	1276:15, 1279:44	1340:23, 1353:36,
apart [2] - 1336:23,	approved [2] -	1330:30, 1330:39,	auto-amp [2] -	1375:44, 1388:9
1354:16	1312:45, 1393:46	1341:13, 1347:13,	1276:15, 1279:44	basis [8] - 1272:32,
apologetic [1] -	April [3] - 1303:12,	1376:21, 1378:40	auto-microconned [1]	1281:17, 1281:20,
1388:29	1309:17, 1384:7	assumed [6] -	- 1268:37	1281:36, 1282:13,
apologies [1] -	area [10] - 1275:21,	1272:28, 1307:19,	automatic [1] - 1313:5	

1333:2, 1340:25, 1372:45	1317:43, 1317:46, 1318:46, 1319:4	1275:32, 1275:36, 1279:12, 1285:14, 1291:13, 1299:33, 1305:36, 1305:38, 1307:21, 1315:10, 1315:38, 1354:10, 1355:4, 1359:22, 1361:37, 1370:10, 1390:11, 1390:30, 1390:33, 1397:11	1383:7, 1383:14, 1383:22, 1386:31, 1387:5, 1387:13, 1387:16, 1387:33, 1387:42, 1388:3, 1388:28, 1389:1, 1390:42, 1391:4, 1391:16, 1391:41, 1392:25, 1393:3, 1393:4, 1393:17, 1395:33, 1396:3, 1396:35, 1398:25, 1398:27	1351:5, 1378:23, 1381:41, 1393:31
basket [7] - 1357:5, 1357:6, 1357:8, 1357:10, 1357:11, 1358:10, 1358:26	benefit [4] - 1273:39, 1279:8, 1335:44, 1336:3	benefits [1] - 1318:33	BRISOTTO [3] - 1367:47, 1391:46, 1393:20	
batch [2] - 1283:33, 1285:45	best [8] - 1278:2, 1279:18, 1280:11, 1304:2, 1304:37, 1327:40, 1359:20	blanket [2] - 1278:35, 1280:7	Brisotto's [4] - 1394:6, 1395:39, 1398:6, 1398:11	C
bay [1] - 1329:37	best-quality [1] - 1359:20	block [3] - 1300:37, 1300:38	Bristow [6] - 1376:29, 1377:21, 1377:29, 1377:33, 1378:3, 1378:6	captured [1] - 1396:45
beads [4] - 1285:15, 1285:16, 1285:17, 1285:21	better [10] - 1266:17, 1274:30, 1275:33, 1275:37, 1285:14, 1311:22, 1317:39, 1348:42, 1363:29, 1399:14	board [1] - 1300:43	broached [4] - 1282:10, 1288:14, 1327:15, 1331:4	capturing [2] - 1294:31, 1397:16
bearing [1] - 1385:30	between [26] - 1285:34, 1292:17, 1293:18, 1307:13, 1308:1, 1314:40, 1314:42, 1316:4, 1334:12, 1342:27, 1359:39, 1362:40, 1365:18, 1365:20, 1365:37, 1368:44, 1373:38, 1373:42, 1379:12, 1379:25, 1380:23, 1383:2, 1390:5, 1396:30, 1398:7, 1398:9	body [8] - 1286:37, 1286:44, 1286:47, 1287:5, 1387:47, 1396:44, 1397:16, 1398:5	broader [2] - 1324:29, 1324:30	care [2] - 1286:5, 1359:19
bears [1] - 1384:6	beyond [5] - 1269:41, 1269:42, 1337:41, 1381:14, 1391:33	boils [1] - 1273:20	brought [14] - 1269:7, 1285:11, 1285:27, 1294:23, 1327:3, 1329:33, 1329:34, 1344:20, 1345:29, 1352:1, 1361:21, 1361:24, 1361:31, 1395:28	career [2] - 1288:17, 1288:18
became [13] - 1269:31, 1272:32, 1273:42, 1284:25, 1289:39, 1289:40, 1306:46, 1309:11, 1313:16, 1323:20, 1359:10, 1366:1, 1395:17	bias [1] - 1301:29	bore [1] - 1313:21	brutal [3] - 1340:44, 1340:47, 1341:6	carriage [2] - 1355:33, 1355:34
become [11] - 1272:5, 1281:31, 1282:13, 1283:22, 1285:18, 1318:14, 1338:11, 1359:33, 1370:9, 1394:10, 1396:35	bid [1] - 1339:9	bottom [12] - 1275:44, 1348:39, 1357:20, 1357:37, 1357:46, 1366:37, 1376:33, 1387:41, 1396:31, 1397:10, 1397:12	bud [2] - 1357:21, 1358:15	carried [3] - 1307:46, 1349:36, 1383:46
becomes [1] - 1385:4	big [12] - 1283:30, 1284:1, 1287:27, 1287:30, 1287:32, 1318:45, 1338:16, 1366:1, 1375:32, 1378:3, 1389:22	boxes [2] - 1398:7, 1398:10	budgetary [1] - 1359:27	carry [3] - 1342:8, 1373:6, 1390:39
began [1] - 1338:28	billion [1] - 1276:39	brace [1] - 1326:33	buffer [3] - 1285:18, 1285:23, 1315:11	Carry [1] - 1367:8
beginning [1] - 1366:6	bin [15] - 1305:35, 1305:36, 1305:42, 1305:45, 1306:2, 1306:3, 1306:4, 1306:8, 1306:15, 1306:36, 1372:11, 1373:16, 1374:3, 1374:6, 1376:2	brackets [1] - 1348:46	bullied [1] - 1301:32	case [79] - 1269:27, 1280:9, 1281:1, 1281:24, 1281:33, 1281:35, 1283:10, 1283:12, 1283:14, 1283:27, 1283:29, 1283:44, 1283:47, 1284:1, 1286:16, 1286:27, 1287:19, 1287:21, 1287:27, 1288:25, 1288:31, 1289:7, 1289:33, 1289:40, 1289:43, 1289:46, 1289:47, 1291:2, 1292:3, 1300:10, 1300:12, 1314:1, 1315:14, 1318:4, 1318:12, 1318:24, 1318:30, 1318:33, 1318:34, 1318:45, 1318:46, 1319:1, 1319:5, 1320:43, 1321:7, 1326:37, 1338:7, 1338:12, 1338:16, 1338:21, 1339:29, 1340:8, 1340:14, 1340:30, 1342:32, 1344:47, 1345:1, 1347:9, 1351:47, 1352:1, 1355:33, 1355:34, 1355:36, 1355:38, 1360:44, 1364:1, 1371:20, 1371:21, 1371:23, 1371:29, 1371:32, 1380:45, 1382:27, 1388:40, 1395:19, 1397:46
behalf [1] - 1266:6	bigger [2] - 1283:28, 1318:44	brainstorming [1] - 1356:23	bully [1] - 1327:6	cases [22] - 1280:3, 1281:8, 1281:33,
behaviour [15] - 1302:24, 1302:30, 1327:1, 1327:6, 1327:9, 1327:14, 1327:16, 1327:47, 1330:4, 1342:26, 1342:41, 1342:44, 1343:10, 1346:23, 1347:20	binds [1] - 1285:19	breach [1] - 1301:30	BUNDLE [1] - 1386:23	
behaviours [1] - 1346:23	biologicals [1] - 1379:27	break [2] - 1311:25, 1347:4	bushland [1] - 1286:40	
behind [2] - 1318:26, 1392:20	bit [23] - 1269:6, 1270:12, 1275:29,	breaker [1] - 1305:1	busy [1] - 1374:10	
belief [1] - 1337:11		brief [2] - 1350:6, 1400:27	BY [9] - 1266:32, 1311:34, 1315:36, 1320:8, 1348:11,	
belittle [1] - 1343:37		briefed [1] - 1275:3		
belittled [3] - 1288:32, 1344:19, 1344:34		briefing [1] - 1297:33		
belittling [4] - 1343:22, 1343:25, 1344:15, 1344:23		briefly [5] - 1268:36, 1343:40, 1348:9, 1349:44, 1355:25		
bell [3] - 1291:12, 1382:34, 1383:47		bring [8] - 1288:46, 1294:13, 1300:13, 1300:16, 1300:20, 1304:8, 1304:9, 1344:14		
belongings [1] - 1373:17		bringing [5] - 1284:14, 1288:42, 1299:32, 1300:17, 1310:33		
below [3] - 1315:12, 1332:26, 1332:32		Brisbane [2] - 1265:14, 1265:15		
beneficial [7] - 1279:18, 1281:36,		Brisotto [33] - 1366:33, 1366:42, 1367:42, 1367:45, 1370:46, 1381:43, 1382:17, 1382:27,		

1281:34, 1283:28, 1283:30, 1287:30, 1289:18, 1291:5, 1294:31, 1296:37, 1318:7, 1318:38, 1318:41, 1319:13, 1319:20, 1338:23, 1355:31, 1364:18, 1369:31, 1371:3, 1379:44	cautious [1] - 1284:33 cc [1] - 1366:38 CCC [1] - 1373:1 ceased [1] - 1290:3 cells [2] - 1291:5, 1291:6 cent [1] - 1353:17 centrifuge [2] - 1357:29, 1357:36 CEO [1] - 1378:7 certain [10] - 1288:28, 1295:27, 1310:39, 1310:43, 1315:43, 1316:10, 1317:15, 1348:25, 1356:19, 1371:17 certainly [14] - 1281:31, 1299:34, 1302:27, 1315:22, 1318:44, 1319:21, 1331:33, 1334:39, 1338:14, 1338:21, 1340:13, 1340:15, 1344:6, 1344:12 certainty [1] - 1295:29 cessation [1] - 1398:24 cetera [2] - 1315:44, 1388:12 chain [7] - 1301:47, 1303:5, 1303:38, 1304:4, 1305:5, 1305:19, 1307:47 chains [2] - 1336:14, 1336:15 chair [3] - 1340:14, 1348:47, 1349:9 chaired [2] - 1340:4, 1340:9 challenges [1] - 1391:21 chances [1] - 1315:44 change [17] - 1268:37, 1273:14, 1273:29, 1285:16, 1293:19, 1319:17, 1362:15, 1375:11, 1378:41, 1381:11, 1381:28, 1383:44, 1386:43, 1386:45, 1388:33, 1397:4, 1399:30 change-around [1] - 1397:4 changed [5] - 1268:13, 1268:32, 1314:46, 1381:6, 1381:21 changes [9] - 1348:29, 1348:31, 1380:43, 1383:46,	1384:29, 1392:31, 1392:32, 1392:36, 1393:2 changing [2] - 1285:24, 1297:25 chapter [1] - 1290:14 character [1] - 1337:12 charge [4] - 1342:14, 1354:22, 1368:21, 1368:25 charged [2] - 1285:17, 1285:18 chat [1] - 1305:12 chatting [2] - 1329:46, 1330:23 check [2] - 1354:12, 1354:18 checks [3] - 1297:20, 1336:10, 1355:40 chemistry [1] - 1351:40 chief [1] - 1311:24 child [1] - 1277:4 child's [1] - 1276:29 Chinese [2] - 1327:34, 1327:36 choice [1] - 1314:40 chose [2] - 1274:19, 1276:25 chronology [3] - 1320:40, 1320:42, 1382:14 circulated [1] - 1383:25 circumstances [5] - 1283:15, 1327:10, 1329:17, 1337:25, 1371:30 Claire [1] - 1329:40 clarification [3] - 1274:31, 1303:39, 1315:38 clarify [2] - 1345:23, 1399:29 Clarke [6] - 1301:38, 1302:4, 1303:4, 1303:12, 1377:34, 1377:44 classic [1] - 1310:34 clean [2] - 1307:18, 1358:28 clear [14] - 1287:14, 1294:30, 1297:15, 1298:29, 1309:42, 1311:41, 1326:27, 1341:37, 1342:36, 1343:46, 1344:25, 1344:28, 1345:7, 1357:43	cleared [1] - 1306:19 clearer [1] - 1317:44 clearly [4] - 1274:17, 1287:27, 1304:32, 1327:33 client [1] - 1382:1 closer [1] - 1321:19 coated [1] - 1285:15 code [3] - 1301:31, 1346:31, 1346:37 cohort [1] - 1324:9 collaborating [2] - 1391:7, 1395:33 collaboration [1] - 1395:18 collaborative [1] - 1391:26 collaborator [1] - 1395:39 colleague [1] - 1304:13 colleagues [8] - 1274:8, 1296:31, 1297:17, 1329:29, 1329:32, 1335:38, 1346:17, 1349:22 collect [2] - 1363:37, 1369:12 collecting [2] - 1269:31, 1328:46 collection [1] - 1382:47 colour [2] - 1339:40, 1339:41 combination [1] - 1351:41 comfortable [5] - 1289:14, 1289:16, 1305:2, 1327:25, 1342:12 coming [12] - 1301:3, 1307:11, 1313:47, 1325:20, 1338:29, 1338:37, 1338:41, 1339:2, 1349:26, 1354:2, 1354:17, 1399:41 commence [1] - 1310:19 commenced [2] - 1304:2, 1326:42 commend [1] - 1377:47 comment [11] - 1299:44, 1306:5, 1308:43, 1309:2, 1313:1, 1341:10, 1349:4, 1349:6, 1350:20, 1385:40, 1389:15	commentary [1] - 1389:19 comments [10] - 1288:32, 1301:22, 1301:27, 1301:34, 1361:18, 1361:46, 1362:7, 1362:23, 1391:1, 1391:16 COMMISSION [2] - 1265:4, 1401:8 Commission [29] - 1267:3, 1268:8, 1268:19, 1269:17, 1273:24, 1310:11, 1310:17, 1310:28, 1310:39, 1311:12, 1319:10, 1324:7, 1326:42, 1333:15, 1333:21, 1341:14, 1346:6, 1346:15, 1346:47, 1349:21, 1349:30, 1349:32, 1350:23, 1351:15, 1351:18, 1389:39, 1389:46, 1390:7, 1395:7 commission [1] - 1310:20 commissioner [1] - 1391:36 Commissioner [55] - 1265:26, 1266:3, 1266:10, 1266:27, 1266:37, 1267:19, 1273:2, 1273:45, 1279:41, 1282:45, 1286:19, 1289:38, 1293:6, 1298:20, 1299:42, 1304:2, 1319:27, 1320:38, 1323:45, 1324:31, 1325:1, 1325:22, 1325:28, 1336:43, 1338:35, 1341:43, 1348:9, 1350:29, 1350:41, 1350:47, 1351:24, 1373:10, 1376:11, 1376:16, 1377:15, 1377:37, 1378:18, 1381:39, 1385:2, 1386:12, 1386:27, 1390:14, 1390:30, 1392:15, 1393:8, 1395:2, 1396:7, 1396:19, 1398:38, 1398:43, 1399:18, 1399:30, 1400:11, 1400:23, 1400:36 COMMISSIONER [138]
---	---	---	---	---

- 1266:1, 1266:8,
1266:17, 1266:24,
1267:22, 1267:28,
1267:35, 1270:44,
1272:8, 1272:47,
1275:16, 1275:25,
1275:39, 1277:15,
1280:31, 1281:39,
1282:43, 1285:37,
1287:37, 1288:20,
1288:37, 1292:44,
1293:8, 1294:29,
1297:32, 1300:34,
1302:35, 1303:45,
1304:6, 1305:41,
1306:25, 1307:26,
1311:27, 1311:32,
1315:34, 1319:29,
1319:45, 1320:2,
1320:6, 1323:43,
1324:13, 1324:19,
1324:35, 1325:7,
1325:18, 1325:24,
1325:30, 1325:37,
1327:36, 1330:15,
1332:32, 1332:37,
1334:27, 1336:26,
1336:47, 1337:7,
1337:17, 1338:32,
1338:47, 1339:7,
1341:46, 1342:4,
1342:8, 1342:12,
1342:17, 1345:9,
1345:14, 1345:18,
1346:27, 1346:33,
1347:27, 1347:44,
1348:1, 1348:6,
1350:32, 1350:39,
1350:45, 1351:26,
1356:46, 1358:44,
1366:16, 1367:40,
1367:44, 1368:6,
1370:12, 1372:38,
1372:45, 1373:6,
1374:45, 1377:17,
1377:40, 1378:6,
1378:21, 1381:4,
1381:17, 1381:27,
1381:33, 1381:37,
1386:10, 1386:14,
1386:20, 1390:10,
1390:17, 1390:22,
1390:26, 1390:33,
1390:39, 1391:39,
1391:44, 1392:2,
1392:8, 1393:11,
1393:17, 1393:23,
1393:28, 1394:22,
1394:28, 1394:36,
1394:42, 1395:32,
1398:23, 1398:32,
1398:36, 1398:41,
1398:47, 1399:20,
1399:26, 1399:34,
1399:40, 1400:3,
1400:9, 1400:15,
1400:21, 1400:27,
1400:32, 1400:40,
1400:46, 1401:6
commitments [2] -
1400:4, 1400:33
committee [4] -
1383:28, 1383:38,
1385:10, 1393:47
common [3] - 1356:7,
1396:11, 1396:16
commonly [1] -
1360:17
communicated [7] -
1327:33, 1327:40,
1327:45, 1328:15,
1328:28, 1328:31
communication [3] -
1336:9, 1379:25,
1382:32
communications [3] -
1337:13, 1382:16,
1394:17
community [1] -
1311:21
company [1] -
1375:11
compared [1] -
1362:41
complaining [1] -
1312:10
complaint [1] - 1378:2
complaints [1] -
1324:21
complete [1] -
1385:27
completed [3] -
1379:42, 1398:15,
1398:18
completely [2] -
1337:3, 1365:12
complex [1] - 1314:3
compliance [3] -
1303:18, 1306:27,
1372:26
component [1] -
1379:25
components [1] -
1369:17
comprehensive [3] -
1352:20, 1353:1,
1354:44
concentrate [5] -
1276:25, 1313:30,
1316:7, 1316:10,
1317:33
concentrated [7] -
1277:31, 1312:22,
1313:40, 1314:16,
1314:42, 1319:31,
1319:35
concentrating [7] -
1278:3, 1313:13,
1314:40, 1315:43,
1316:5, 1316:6,
1316:38
concentration [14] -
1274:45, 1277:29,
1277:45, 1278:8,
1312:13, 1312:44,
1313:6, 1313:18,
1314:20, 1314:29,
1315:42, 1319:40,
1319:41, 1319:43
concern [24] -
1274:36, 1274:44,
1276:6, 1278:33,
1278:35, 1278:39,
1278:44, 1278:46,
1279:3, 1279:12,
1282:29, 1285:3,
1288:22, 1289:8,
1292:32, 1292:42,
1293:46, 1294:10,
1315:28, 1317:20,
1333:15, 1363:11,
1365:27, 1389:20
concerned [13] -
1270:5, 1270:8,
1282:10, 1283:34,
1287:29, 1296:32,
1298:46, 1303:42,
1305:38, 1317:25,
1329:29, 1353:33,
1363:13
CONCERNING [1] -
1392:12
concerning [2] -
1381:5, 1392:9
concerns [46] -
1269:8, 1269:45,
1271:13, 1271:36,
1272:3, 1272:27,
1275:1, 1275:20,
1278:25, 1279:27,
1279:28, 1282:9,
1287:25, 1290:34,
1292:4, 1292:37,
1294:8, 1294:10,
1294:23, 1296:9,
1296:17, 1297:43,
1308:11, 1309:16,
1309:39, 1310:25,
1327:33, 1327:40,
1327:45, 1328:32,
1328:43, 1330:5,
1330:6, 1330:7,
1330:13, 1349:20,
1349:22, 1349:32,
1352:11, 1355:13,
1362:39, 1376:18,
1376:22, 1377:12,
1378:9, 1386:38
conclude [2] -
1325:18, 1398:26
conclusion [4] -
1307:20, 1337:31,
1394:8, 1394:33
conduct [7] - 1272:38,
1301:31, 1327:11,
1327:23, 1343:16,
1346:31, 1346:37
conducted [4] -
1302:26, 1302:28,
1307:33, 1341:16
conducting [1] -
1352:7
confidence [3] -
1316:9, 1317:14,
1350:17
confident [2] -
1287:22, 1325:26
confidential [15] -
1303:13, 1303:35,
1304:16, 1304:20,
1305:35, 1305:39,
1305:41, 1306:8,
1306:15, 1372:11,
1373:16, 1374:3,
1374:6, 1374:7,
1376:2
confidentiality [1] -
1372:39
confidentially [3] -
1310:28, 1311:12,
1349:30
confining [1] -
1326:27
confirm [3] - 1280:41,
1284:31, 1318:19
confirming [1] -
1389:19
conflict [2] - 1342:26,
1382:23
confused [3] - 1274:5,
1274:9, 1318:18
confusing [1] -
1280:21
connection [1] -
1307:13
connotation [1] -
1272:43
consensus [9] -
1316:1, 1316:26,
1316:28, 1316:32,
1316:47, 1317:2,
1317:30, 1319:30,
1348:14
consider [5] -
1317:27, 1347:19,
1369:13, 1374:15,
1374:18
consideration [3] -
1281:13, 1317:16,
1318:25
considered [4] -
1287:27, 1291:42,
1315:12, 1319:1
considering [2] -
1399:4, 1399:6
consisted [1] - 1326:1
consistent [3] -
1388:17, 1393:36,
1393:38
consistently [1] -
1318:34
constantly [1] -
1331:30
constitute [2] -
1347:31, 1347:37
consultant [2] -
1341:5, 1341:18
consumables [1] -
1360:32
contact [2] - 1275:22,
1331:17
contain [4] - 1295:23,
1295:24, 1357:12,
1380:9
contained [1] -
1287:10
containing [1] -
1295:41
contains [1] - 1392:46
contaminated [6] -
1284:33, 1286:13,
1289:43, 1355:26,
1358:21, 1358:27
contamination [23] -
1283:19, 1283:23,
1283:24, 1283:34,
1284:18, 1285:6,
1285:10, 1285:35,
1286:28, 1287:28,
1287:30, 1287:44,
1287:45, 1288:10,
1289:34, 1290:13,
1296:17, 1351:39,
1351:44, 1354:1,
1356:2, 1356:47,
1358:22
contaminations [5] -
1287:32, 1289:19,
1300:14, 1345:2,
1352:18
contemplate [1] -

1302:47	1329:36, 1375:46, 1390:2	1360:24, 1360:31	- 1348:14, 1390:15, 1400:27	1383:13, 1391:42, 1392:9
contemplating [1] - 1275:28	convey [4] - 1317:1, 1329:13, 1329:34, 1345:42	cost-cutting [1] - 1360:7	cross-purposes [1] - 1345:12	DATED [8] - 1267:38, 1351:28, 1368:1, 1368:9, 1377:24, 1391:47, 1392:13, 1393:20
contemporaneous [1] - 1366:22	conveyed [6] - 1273:29, 1273:33, 1279:20, 1337:29, 1341:2, 1341:35	costs [2] - 1358:37, 1359:20	Csoban [12] - 1302:21, 1302:32, 1340:4, 1340:9, 1349:15, 1374:19, 1374:37, 1375:1, 1375:5, 1375:7, 1375:40, 1376:12	dates [1] - 1383:20
contend [1] - 1341:38	conveying [1] - 1278:47	cotton [2] - 1357:21, 1358:15	Csoban's [1] - 1302:30	day-to-day [1] - 1326:41
content [7] - 1334:42, 1342:14, 1364:7, 1364:8, 1369:23, 1369:27, 1400:37	cool [1] - 1345:31	Counsel [1] - 1265:30	culminates [1] - 1300:7	days [9] - 1275:11, 1275:14, 1275:17, 1275:23, 1275:27, 1283:27, 1355:15, 1379:9, 1384:12
contentious [4] - 1366:3, 1368:47, 1370:6, 1370:9	Cooper [4] - 1266:5, 1266:10, 1266:24, 1320:2	counsel [4] - 1266:5, 1266:11, 1346:5, 1382:15	culmination [1] - 1307:28	deal [6] - 1287:35, 1315:41, 1351:31, 1351:35, 1378:3, 1394:12
context [5] - 1283:18, 1379:47, 1380:27, 1382:21, 1386:29	COOPER [5] - 1266:10, 1266:11, 1266:20, 1320:4, 1400:17	counselling [5] - 1304:20, 1304:23, 1304:32, 1306:31, 1307:29	cultural [7] - 1300:3, 1324:29, 1351:32, 1363:6, 1366:2, 1368:46, 1375:11	dealing [3] - 1320:34, 1366:3, 1381:7
contextual [2] - 1281:35, 1301:29	cooperative [1] - 1390:4	couple [9] - 1273:23, 1275:11, 1275:14, 1275:17, 1300:5, 1323:8, 1336:23, 1361:43, 1379:6	cultural-type [1] - 1351:32	deals [1] - 1268:7
continue [5] - 1299:35, 1329:10, 1341:43, 1342:10, 1366:3	copied [1] - 1390:44	courage [1] - 1378:1	culture [2] - 1308:35, 1309:22	dealt [6] - 1269:21, 1271:24, 1313:23, 1363:5, 1386:47, 1394:43
continued [6] - 1284:3, 1284:6, 1285:6, 1293:43, 1331:21, 1368:36	copy [6] - 1266:47, 1270:13, 1270:14, 1307:47, 1390:10	course [14] - 1273:5, 1273:12, 1292:34, 1318:6, 1320:39, 1336:35, 1337:2, 1347:32, 1349:24, 1350:33, 1358:37, 1399:1, 1399:16, 1399:37	curiosity [1] - 1389:20	debacle [2] - 1299:29, 1299:46
contrary [2] - 1346:23, 1346:37	correct [39] - 1267:11, 1267:16, 1267:44, 1268:5, 1268:15, 1268:30, 1268:38, 1268:42, 1269:3, 1269:21, 1269:36, 1273:34, 1276:30, 1276:41, 1277:25, 1277:35, 1278:5, 1279:1, 1283:8, 1283:11, 1285:4, 1286:7, 1286:24, 1289:23, 1291:23, 1293:11, 1295:43, 1303:23, 1305:22, 1309:40, 1317:31, 1320:11, 1323:14, 1335:8, 1335:11, 1349:13, 1349:17, 1353:23, 1372:18	court [5] - 1287:29, 1287:38, 1288:44, 1300:8, 1359:18	curious [1] - 1355:31	debacle [1] - 1299:43
contribute [1] - 1395:28	copied [1] - 1390:44	Court [1] - 1265:14	current [7] - 1280:15, 1314:45, 1317:37, 1378:27, 1380:7, 1381:7	Deborah [1] - 1329:41
contributed [4] - 1276:40, 1290:44, 1308:6, 1353:1	copy [6] - 1266:47, 1270:13, 1270:14, 1307:47, 1390:10	cover [6] - 1357:2, 1382:43, 1384:5, 1384:6, 1385:4, 1385:31	cut [1] - 1383:22	deceased's [1] - 1286:37
contribution [2] - 1389:33, 1396:2	correct [39] - 1267:11, 1267:16, 1267:44, 1268:5, 1268:15, 1268:30, 1268:38, 1268:42, 1269:3, 1269:21, 1269:36, 1273:34, 1276:30, 1276:41, 1277:25, 1277:35, 1278:5, 1279:1, 1283:8, 1283:11, 1285:4, 1286:7, 1286:24, 1289:23, 1291:23, 1293:11, 1295:43, 1303:23, 1305:22, 1309:40, 1317:31, 1320:11, 1323:14, 1335:8, 1335:11, 1349:13, 1349:17, 1353:23, 1372:18	covered [1] - 1331:19	cutting [2] - 1360:7, 1398:27	December [1] - 1290:8
contributions [2] - 1390:6, 1396:10	correction [1] - 1267:23	create [1] - 1294:33	D	decide [1] - 1367:29
contributor [1] - 1368:45	corrections [1] - 1267:13	created [1] - 1382:44	d [1] - 1267:26	decided [1] - 1353:33
contributors [4] - 1365:45, 1369:9, 1370:4, 1394:2	correctly [3] - 1316:34, 1317:21, 1318:35	crime [4] - 1338:19, 1380:17, 1381:30, 1399:37	Dale [1] - 1350:47	decision [33] - 1273:28, 1273:33, 1273:42, 1273:46, 1274:3, 1275:2, 1275:21, 1278:22, 1278:25, 1278:27, 1278:47, 1279:20, 1282:4, 1282:5, 1282:6, 1282:17, 1282:25, 1282:28, 1303:27, 1313:16, 1329:30, 1329:35, 1330:46, 1331:34, 1331:35, 1331:43, 1331:46, 1332:3, 1332:4, 1332:10, 1353:6, 1356:25, 1356:42
controls [4] - 1283:33, 1283:36, 1355:28, 1355:29	correspond [1] - 1267:32	criminals [1] - 1270:33	Darmanian [1] - 1266:21	Decision [3] - 1384:23, 1385:21, 1385:44
controversy [1] - 1386:32	correspondence [1] - 1347:30	criteria [1] - 1298:38	data [12] - 1269:31, 1328:46, 1360:47, 1363:37, 1369:12, 1370:46, 1386:42, 1386:46, 1397:24, 1397:39, 1397:46, 1398:14	decision-maker [1] - 1282:4
convened [1] - 1346:7	cost [9] - 1356:38, 1359:6, 1359:15, 1360:1, 1360:5, 1360:7, 1360:10,	cross [9] - 1285:35, 1289:34, 1289:43, 1345:12, 1348:14, 1354:1, 1361:38, 1390:15, 1400:27	Data [1] - 1392:29	decision-making [1] - 1282:25
convenience [1] - 1347:10		cross-contaminated [1] - 1289:43	date [13] - 1321:14, 1333:9, 1343:31, 1373:23, 1373:26, 1377:17, 1383:13, 1384:6, 1384:31, 1385:5, 1385:30, 1394:34	
convenient [3] - 1391:36, 1400:37, 1401:4		cross-contamination [3] - 1285:35, 1289:34, 1354:1	dated [4] - 1368:4,	
conversation [6] - 1304:47, 1330:33, 1333:3, 1333:8, 1374:42, 1376:3		cross-examination [3]		
conversational [1] - 1304:43				
conversations [3] -				

decisions [5] - 1268:13, 1282:13, 1282:19, 1282:23, 1380:46	1376:11	1400:11	director [6] - 1277:20, 1278:12, 1279:33, 1302:20, 1309:7, 1309:12	1276:1, 1329:28, 1329:32, 1330:32, 1330:34, 1330:37, 1333:37, 1349:26, 1354:16, 1354:32, 1354:34, 1355:12, 1372:2, 1397:26, 1397:38, 1397:42, 1398:16
deeply [1] - 1348:25	deserves [1] - 1311:21	Diehm's [1] - 1396:4	director-general [1] - 1279:33	disharmony [9] - 1324:10, 1324:15, 1324:29, 1324:30, 1335:26, 1347:11, 1347:16, 1347:19
deficient [1] - 1277:38	design [6] - 1362:10, 1362:12, 1383:44, 1383:46, 1384:30, 1397:41	diff [5] - 1291:26, 1291:45, 1292:27, 1332:23, 1364:3	disagreed [1] - 1371:14	dismissive [5] - 1329:26, 1330:4, 1330:6, 1330:13, 1343:22
definite [1] - 1368:40	Design [1] - 1384:21	difference [2] - 1316:4, 1389:22	disappeared [1] - 1326:47	disposal [1] - 1306:15
definitely [3] - 1279:43, 1312:1, 1356:17	designed [1] - 1380:14	differences [2] - 1348:21, 1362:40	disappointed [1] - 1376:43	disregard [1] - 1294:26
deflected [1] - 1278:15	desire [4] - 1324:23, 1363:29, 1369:11, 1369:19	different [18] - 1279:9, 1281:28, 1300:38, 1316:31, 1336:35, 1337:10, 1344:2, 1359:42, 1360:18, 1362:33, 1363:28, 1371:29, 1371:30, 1371:31, 1372:9, 1388:10, 1395:11	discern [1] - 1325:3	dissolves [1] - 1357:35
degree [1] - 1318:42	desk [3] - 1306:19, 1307:18, 1307:21	differential [5] - 1291:25, 1294:44, 1363:23, 1364:2, 1364:15	Disclosure [1] - 1272:24	distracted [1] - 1275:16
delay [9] - 1279:13, 1293:11, 1294:22, 1294:26, 1294:27, 1368:45, 1369:9, 1369:19, 1370:5	despite [2] - 1302:8, 1397:41	differently [1] - 1344:9	disclosure [10] - 1271:8, 1271:12, 1272:9, 1272:13, 1272:20, 1272:25, 1272:28, 1272:31, 1272:33, 1273:11	distressed [3] - 1298:44, 1299:22, 1337:28
deliberate [1] - 1347:22	destroyed [1] - 1305:44	difficult [5] - 1269:29, 1288:41, 1325:3, 1327:5	discord [1] - 1347:35	distressing [1] - 1308:41
deliberately [2] - 1347:11, 1347:35	destruction [1] - 1305:41	difficulties [2] - 1311:37, 1378:27	discreetly [1] - 1336:44	disturbing [1] - 1274:11
delicate [1] - 1341:30	detail [3] - 1277:3, 1325:25, 1347:28	difficulty [4] - 1324:31, 1325:2, 1336:43, 1346:33	discrete [1] - 1351:36	division [1] - 1323:46
delve [1] - 1353:6	details [5] - 1291:13, 1298:37, 1298:43, 1303:34, 1343:2	DIFF [21] - 1268:46, 1269:21, 1270:6, 1271:18, 1271:26, 1274:37, 1276:25, 1277:28, 1278:36, 1296:11, 1309:16, 1309:35, 1312:14, 1313:42, 1313:44, 1314:25, 1318:28, 1319:38, 1328:37, 1349:24, 1360:42	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	DNA [51] - 1265:6, 1267:41, 1268:4, 1274:28, 1276:35, 1276:40, 1278:38, 1282:21, 1283:14, 1283:32, 1283:34, 1283:35, 1285:12, 1285:13, 1285:17, 1285:18, 1285:20, 1285:24, 1285:35, 1286:16, 1287:10, 1291:8, 1300:5, 1307:41, 1307:43, 1308:16, 1308:26, 1315:8, 1328:41, 1329:7, 1353:47, 1355:27, 1355:30, 1357:7, 1357:9, 1357:12, 1357:35, 1357:36, 1357:43, 1357:46, 1358:7, 1358:14, 1360:26, 1362:42, 1371:38, 1371:39, 1371:42, 1373:18, 1374:7, 1375:8, 1384:38
demonstrate [1] - 1325:31	detect [2] - 1281:6, 1370:36	difficulties [2] - 1311:37, 1378:27	discussed [23] - 1271:8, 1272:4, 1273:11, 1274:8, 1274:19, 1294:11, 1309:33, 1323:7, 1323:16, 1323:23, 1326:16, 1328:23, 1328:42, 1334:45, 1342:42, 1346:46, 1347:3, 1349:20, 1349:22, 1349:25, 1354:31, 1374:16, 1394:32	dismissive [5] - 1329:26, 1330:4, 1330:6, 1330:13, 1343:22
demonstrated [1] - 1291:46	detected [2] - 1291:11, 1295:28	difficult [5] - 1269:29, 1288:41, 1325:3, 1327:5	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	disposal [1] - 1306:15
demonstrates [1] - 1343:15	detecting [2] - 1294:45, 1384:37	difficulty [4] - 1324:31, 1325:2, 1336:43, 1346:33	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	disregard [1] - 1294:26
department [5] - 1271:23, 1302:10, 1310:36, 1333:42, 1350:16	determined [1] - 1295:23	DIFF [21] - 1268:46, 1269:21, 1270:6, 1271:18, 1271:26, 1274:37, 1276:25, 1277:28, 1278:36, 1296:11, 1309:16, 1309:35, 1312:14, 1313:42, 1313:44, 1314:25, 1318:28, 1319:38, 1328:37, 1349:24, 1360:42	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	dissolves [1] - 1357:35
departments [1] - 1300:18	develop [1] - 1310:13	difficulties [2] - 1311:37, 1378:27	discussed [23] - 1271:8, 1272:4, 1273:11, 1274:8, 1274:19, 1294:11, 1309:33, 1323:7, 1323:16, 1323:23, 1326:16, 1328:23, 1328:42, 1334:45, 1342:42, 1346:46, 1347:3, 1349:20, 1349:22, 1349:25, 1354:31, 1374:16, 1394:32	distracted [1] - 1275:16
departure [2] - 1307:14, 1307:18	developed [2] - 1397:36, 1399:21	difficult [5] - 1269:29, 1288:41, 1325:3, 1327:5	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	distressed [3] - 1298:44, 1299:22, 1337:28
deploy [1] - 1322:34	developing [1] - 1398:25	difficulties [2] - 1311:37, 1378:27	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	distressing [1] - 1308:41
deployed [1] - 1337:35	development [2] - 1393:43, 1394:7	difficulty [4] - 1324:31, 1325:2, 1336:43, 1346:33	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	disturbing [1] - 1274:11
deprecating [1] - 1345:30	Diehm [5] - 1319:45, 1381:37, 1390:12, 1394:22, 1398:23	DINT [1] - 1338:43	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	division [1] - 1323:46
depth [2] - 1288:16, 1330:42	DIEHM [34] - 1319:47, 1381:39, 1381:41, 1381:43, 1386:8, 1386:12, 1386:17, 1386:27, 1390:14, 1390:19, 1390:24, 1390:29, 1390:36, 1390:41, 1391:36, 1391:41, 1392:5, 1392:15, 1393:8, 1393:14, 1393:26, 1393:34, 1394:26, 1394:32, 1394:40, 1395:2, 1396:7, 1398:30, 1398:34, 1398:38, 1398:43, 1399:18, 1399:24,	direct [4] - 1274:30, 1300:34, 1351:36, 1356:40	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	DNA [51] - 1265:6, 1267:41, 1268:4, 1274:28, 1276:35, 1276:40, 1278:38, 1282:21, 1283:14, 1283:32, 1283:34, 1283:35, 1285:12, 1285:13, 1285:17, 1285:18, 1285:20, 1285:24, 1285:35, 1286:16, 1287:10, 1291:8, 1300:5, 1307:41, 1307:43, 1308:16, 1308:26, 1315:8, 1328:41, 1329:7, 1353:47, 1355:27, 1355:30, 1357:7, 1357:9, 1357:12, 1357:35, 1357:36, 1357:43, 1357:46, 1358:7, 1358:14, 1360:26, 1362:42, 1371:38, 1371:39, 1371:42, 1373:18, 1374:7, 1375:8, 1384:38
derived [1] - 1383:43	Diehm [5] - 1319:45, 1381:37, 1390:12, 1394:22, 1398:23	directed [2] - 1317:38, 1340:17	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	dismissive [5] - 1329:26, 1330:4, 1330:6, 1330:13, 1343:22
describe [4] - 1317:30, 1322:35, 1347:10, 1351:37	DIEHM [34] - 1319:47, 1381:39, 1381:41, 1381:43, 1386:8, 1386:12, 1386:17, 1386:27, 1390:14, 1390:19, 1390:24, 1390:29, 1390:36, 1390:41, 1391:36, 1391:41, 1392:5, 1392:15, 1393:8, 1393:14, 1393:26, 1393:34, 1394:26, 1394:32, 1394:40, 1395:2, 1396:7, 1398:30, 1398:34, 1398:38, 1398:43, 1399:18, 1399:24,	direction [2] - 1372:16, 1372:21	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	disregard [1] - 1294:26
described [13] - 1280:14, 1296:32, 1298:10, 1307:22, 1318:37, 1321:45, 1322:4, 1325:10, 1334:16, 1336:5, 1376:3, 1384:5, 1399:36	DIEHM [34] - 1319:47, 1381:39, 1381:41, 1381:43, 1386:8, 1386:12, 1386:17, 1386:27, 1390:14, 1390:19, 1390:24, 1390:29, 1390:36, 1390:41, 1391:36, 1391:41, 1392:5, 1392:15, 1393:8, 1393:14, 1393:26, 1393:34, 1394:26, 1394:32, 1394:40, 1395:2, 1396:7, 1398:30, 1398:34, 1398:38, 1398:43, 1399:18, 1399:24,	directions [4] - 1279:29, 1304:35, 1372:34, 1372:39	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	dissolves [1] - 1357:35
describes [2] - 1344:40, 1388:3	DIEHM [34] - 1319:47, 1381:39, 1381:41, 1381:43, 1386:8, 1386:12, 1386:17, 1386:27, 1390:14, 1390:19, 1390:24, 1390:29, 1390:36, 1390:41, 1391:36, 1391:41, 1392:5, 1392:15, 1393:8, 1393:14, 1393:26, 1393:34, 1394:26, 1394:32, 1394:40, 1395:2, 1396:7, 1398:30, 1398:34, 1398:38, 1398:43, 1399:18, 1399:24,	Directions [1] - 1303:34	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	distracted [1] - 1275:16
describing [1] -	DIEHM [34] - 1319:47, 1381:39, 1381:41, 1381:43, 1386:8, 1386:12, 1386:17, 1386:27, 1390:14, 1390:19, 1390:24, 1390:29, 1390:36, 1390:41, 1391:36, 1391:41, 1392:5, 1392:15, 1393:8, 1393:14, 1393:26, 1393:34, 1394:26, 1394:32, 1394:40, 1395:2, 1396:7, 1398:30, 1398:34, 1398:38, 1398:43, 1399:18, 1399:24,	directly [7] - 1277:28, 1327:3, 1327:15, 1327:21, 1327:29, 1382:1, 1394:37	discuss [15] - 1272:5, 1275:30, 1277:9, 1303:17, 1304:7, 1306:26, 1306:29, 1309:8, 1353:36, 1353:39, 1356:8, 1368:47, 1372:25, 1374:19, 1392:41	distressed [3] - 1298:44, 1299:22, 1337:28

1285:14, 1290:2, 1290:13, 1294:12, 1294:21, 1296:6, 1296:18, 1299:31, 1351:37, 1351:39	1377:3	drafted [1] - 1395:29	effort [1] - 1368:37	emails [11] - 1297:21,
document [39] -	doubling [1] - 1358:37	drafts [2] - 1390:20,	efforts [1] - 1308:35	1297:24, 1297:26,
1274:33, 1367:26,	doubt [2] - 1389:22,	1393:9	eight [5] - 1295:19,	1297:28, 1303:39,
1367:27, 1382:41,	1392:19	dripping [1] - 1357:1	1296:7, 1297:8,	1304:4, 1304:41,
1382:44, 1383:30,	down [21] - 1273:20,	drive [1] - 1397:27	1365:41, 1377:6	1367:36, 1376:28,
1384:4, 1384:5,	1279:16, 1301:47,	driver [1] - 1360:31	either [13] - 1269:26,	1377:27, 1396:28
1384:18, 1384:21,	1321:4, 1341:7,	dropped [1] - 1280:29	1279:27, 1303:6,	embarrassed [1] -
1384:41, 1385:2,	1341:18, 1346:13,	due [4] - 1318:16,	1314:47, 1316:27,	1345:33
1385:17, 1385:28,	1346:18, 1353:11,	1398:25, 1399:1,	1326:13, 1331:39,	embarrassing [1] -
1385:35, 1385:40,	1353:25, 1353:33,	1399:16	1343:34, 1354:39,	1289:4
1386:37, 1387:37,	1355:20, 1363:23,	dumbfounded [1] -	1376:43, 1392:5,	emerged [2] -
1388:34, 1388:39,	1367:17, 1367:18,	1359:22	1397:20, 1400:28	1307:28, 1397:3
1391:6, 1391:11,	1367:33, 1379:18,	Duncan [1] - 1399:43	elsewhere [5] -	Emma [8] - 1290:31,
1391:13, 1391:15,	1396:23, 1396:24,	during [12] - 1279:20,	1279:9, 1325:13,	1307:4, 1339:35,
1391:16, 1392:6,	1398:7, 1398:8	1279:28, 1284:12,	1339:2, 1347:39,	1339:38, 1339:43,
1392:17, 1392:30,	dozen [1] - 1342:1	1284:15, 1284:22,	1381:23	1353:12, 1353:16,
1392:45, 1393:40,	Dr [48] - 1266:4,	1301:23, 1307:9,	EMAIL [5] - 1367:47,	1355:18
1394:18, 1396:19,	1266:27, 1266:43,	1320:38, 1330:41,	1368:8, 1377:24,	emotional [1] - 1335:4
1396:26, 1398:8,	1267:20, 1268:7,	1347:4, 1353:16,	1391:46, 1393:20	emotive [1] - 1299:42
1398:18, 1398:24,	1270:12, 1270:17,	1362:42	email [79] - 1273:36,	empathetic [1] -
1398:45	1272:8, 1273:40,	duties [1] - 1297:13	1274:16, 1275:32,	1271:32
documented [1] -	1275:19, 1277:16,		1276:9, 1278:11,	emphasis [1] -
1326:12	1278:21, 1280:6,	E	1278:18, 1281:41,	1362:20
DOCUMENTS [1] -	1281:39, 1282:47,		1281:42, 1282:7,	employed [4] -
1386:23	1286:21, 1290:17,	early [10] - 1270:47,	1282:8, 1301:37,	1266:13, 1315:18,
documents [12] -	1293:5, 1296:6,	1288:18, 1292:45,	1301:47, 1302:19,	1372:47, 1374:37
1366:22, 1382:6,	1298:29, 1300:1,	1312:21, 1352:18,	1303:5, 1303:12,	employee [2] -
1383:5, 1386:8,	1300:47, 1306:39,	1354:16, 1370:13,	1303:13, 1303:33,	1304:26, 1372:34
1386:14, 1386:20,	1309:42, 1311:24,	1385:9, 1385:35,	1303:38, 1303:42,	employees [2] -
1386:32, 1390:36,	1311:36, 1319:29,	1393:47	1303:45, 1304:30,	1307:37, 1346:24
1393:38, 1399:6,	1320:10, 1324:22,	early-morning [1] -	1305:19, 1306:26,	empowers [1] -
1399:7, 1399:9	1324:46, 1325:41,	1270:47	1306:28, 1307:47,	1373:2
Doherty [5] - 1309:7,	1336:27, 1337:8,	easily [1] - 1355:37	1309:20, 1330:7,	empty [1] - 1367:9
1328:3, 1328:7,	1345:18, 1346:27,	easy [1] - 1355:35	1332:7, 1336:14,	enables [1] - 1380:15
1328:15, 1342:21	1346:35, 1346:42,	ED [1] - 1374:37	1336:15, 1336:41,	encompassing [1] -
done [37] - 1273:36,	1347:33, 1348:18,	Edge [11] - 1301:3,	1366:26, 1366:37,	1348:30
1274:6, 1281:16,	1350:32, 1352:4,	1302:16, 1303:11,	1366:38, 1367:18,	encountered [1] -
1289:3, 1293:9,	1372:40, 1378:3,	1340:1, 1340:10,	1367:19, 1367:27,	1311:37
1293:19, 1293:23,	1378:6, 1399:43,	1340:22, 1340:33,	1367:37, 1367:44,	end [19] - 1285:27,
1293:29, 1295:46,	1400:38, 1400:43	1348:34, 1375:12,	1368:3, 1372:16,	1290:12, 1300:9,
1296:3, 1296:10,	DR [1] - 1267:38	1375:15, 1376:36	1372:39, 1372:46,	1301:11, 1302:43,
1306:5, 1314:23,	draft [34] - 1367:37,	edits [3] - 1390:47,	1376:30, 1376:33,	1303:5, 1318:15,
1314:32, 1327:31,	1382:2, 1382:11,	1391:16, 1393:1	1377:15, 1377:20,	1319:38, 1352:19,
1328:21, 1330:3,	1382:18, 1382:33,	EDs [1] - 1327:13	1377:33, 1378:1,	1352:28, 1353:2,
1332:47, 1336:10,	1383:14, 1387:5,	effect [17] - 1271:39,	1382:15, 1382:32,	1354:4, 1363:16,
1344:21, 1344:42,	1387:13, 1387:16,	1281:47, 1282:28,	1387:42, 1387:47,	1365:20, 1368:38,
1344:44, 1354:30,	1387:28, 1388:4,	1288:33, 1289:3,	1389:5, 1389:30,	1369:35, 1374:12,
1361:23, 1363:14,	1388:14, 1388:18,	1301:35, 1322:36,	1389:40, 1390:42,	1374:42, 1382:8
1363:34, 1364:29,	1388:23, 1389:1,	1325:41, 1334:5,	1390:44, 1390:47,	ended [4] - 1294:47,
1364:41, 1370:36,	1389:34, 1390:17,	1339:8, 1341:14,	1391:14, 1391:37,	1302:40, 1304:13,
1370:40, 1375:16,	1390:19, 1390:22,	1343:1, 1344:29,	1391:39, 1391:41,	1390:8
1375:42, 1378:32,	1390:27, 1391:4,	1344:30, 1344:31,	1392:22, 1392:40,	engage [1] - 1353:29
1380:16, 1387:39,	1391:6, 1391:17,	1353:47, 1357:36	1393:14, 1393:17,	engaged [5] -
1396:42, 1397:16	1392:2, 1392:8,	effective [2] - 1315:23,	1396:20, 1396:24,	1309:25, 1347:34,
door [1] - 1297:18	1393:3, 1393:4,	1360:5	1396:30, 1396:31,	1386:41, 1390:43,
dot [2] - 1361:38,	1393:9, 1393:15,	effectively [1] -	1396:32, 1396:41,	1391:5
	1393:23, 1394:1,	1299:23	1397:8, 1397:36,	engagement [1] -
	1396:40, 1397:39	efficacy [1] - 1315:20	1398:5, 1398:13	1379:21
	DRAFT [2] - 1392:12,	efficiency [1] -	emailed [2] - 1270:4,	enlightened [1] -
	1393:31	1360:40	1274:13	1331:47

ensure [2] - 1335:8, 1359:23	1337:47, 1338:13, 1342:29	examination [9] - 1295:35, 1318:5, 1348:7, 1348:14, 1350:30, 1362:41, 1381:13, 1390:15, 1400:27	EXHIBIT [10] - 1267:38, 1351:28, 1367:47, 1368:8, 1377:24, 1386:23, 1391:46, 1392:12, 1393:20, 1393:31	1349:31, 1357:43, 1378:2
entailed [1] - 1337:44	eventually [10] - 1284:10, 1288:34, 1288:35, 1293:39, 1294:23, 1307:19, 1311:9, 1338:12, 1353:36, 1363:15	examining [2] - 1291:29, 1379:10	exhibited [4] - 1290:6, 1309:20, 1309:25, 1310:3	explanation [6] - 1282:35, 1297:32, 1298:10, 1298:13, 1326:19, 1398:13
enter [1] - 1286:6			exhibiting [1] - 1301:28	exploration [1] - 1337:2
entire [1] - 1355:35			exhibits [1] - 1378:32	explore [1] - 1337:5
entirely [2] - 1345:31, 1357:43			exist [1] - 1379:41	explored [3] - 1348:19, 1348:23, 1398:2
entirety [6] - 1269:27, 1281:1, 1283:29, 1300:11, 1300:12, 1360:44	evidence [82] - 1268:4, 1269:17, 1275:19, 1279:42, 1280:6, 1283:14, 1287:16, 1287:24, 1287:38, 1288:9, 1288:23, 1288:24, 1288:28, 1289:14, 1291:17, 1292:38, 1298:1, 1298:30, 1300:8, 1300:35, 1309:12, 1311:24, 1320:34, 1320:39, 1320:42, 1321:45, 1322:8, 1322:23, 1322:36, 1324:3, 1324:4, 1324:6, 1324:8, 1324:20, 1324:37, 1324:38, 1324:45, 1325:2, 1325:9, 1325:13, 1325:19, 1325:41, 1327:18, 1328:10, 1333:16, 1333:17, 1333:28, 1333:30, 1336:44, 1337:33, 1338:9, 1340:31, 1341:14, 1342:20, 1343:20, 1346:46, 1347:3, 1347:30, 1347:38, 1349:20, 1349:42, 1350:12, 1350:22, 1351:14, 1360:26, 1363:21, 1363:27, 1364:12, 1366:1, 1368:21, 1369:41, 1371:21, 1378:31, 1379:37, 1380:20, 1380:44, 1399:1, 1399:4, 1399:7, 1399:44	example [17] - 1289:1, 1289:37, 1289:38, 1291:31, 1309:46, 1310:1, 1310:35, 1315:14, 1318:11, 1319:10, 1337:34, 1343:24, 1346:31, 1360:30, 1362:19, 1371:18, 1380:30	exists [1] - 1380:14	express [3] - 1276:5, 1315:42, 1350:17
ephemeral [1] - 1325:3		examples [3] - 1276:10, 1360:21, 1360:33	expectation [2] - 1331:43, 1360:46	expressed [3] - 1317:20, 1324:27, 1325:13
episode [1] - 1344:41		excellent [1] - 1378:1	expected [1] - 1346:37	expression [1] - 1271:38
equipment [1] - 1317:12		except [2] - 1334:37, 1355:30	expecting [1] - 1355:38	extend [1] - 1318:41
equivalent [1] - 1297:34		exception [1] - 1336:18	expedition [1] - 1307:23	extent [3] - 1325:10, 1343:7, 1393:37
ER [9] - 1291:17, 1363:39, 1363:41, 1364:2, 1364:13, 1364:28, 1367:5, 1367:8, 1367:13		exceptions [1] - 1268:42	expense [3] - 1346:1, 1359:28, 1360:7	external [1] - 1341:5
erred [1] - 1284:33		excerpts [4] - 1350:3, 1350:5, 1350:7, 1350:10	experience [9] - 1282:21, 1313:35, 1330:27, 1331:26, 1338:44, 1338:47, 1339:8, 1339:16, 1350:20	extra [1] - 1355:40
error [5] - 1267:7, 1295:28, 1295:45, 1364:38, 1365:4		exchange [3] - 1390:43, 1391:6, 1395:18	experienced [8] - 1287:31, 1326:23, 1338:30, 1338:39, 1338:40, 1338:44, 1367:5, 1382:23	extract [1] - 1283:33
escalate [5] - 1269:45, 1271:13, 1271:40, 1271:43, 1271:44		exchanged [1] - 1304:41	Experimental [1] - 1384:21	extracted [1] - 1357:7
escalated [5] - 1269:8, 1269:42, 1292:8, 1321:29, 1321:32		executive [5] - 1277:20, 1278:12, 1302:20, 1309:7, 1309:12	experimentation [3] - 1384:24, 1385:22, 1385:45	extracting [2] - 1357:5, 1358:10
escalating [1] - 1311:45		exercise [2] - 1308:27, 1386:41	experiments [7] - 1363:34, 1367:8, 1369:16, 1384:22, 1384:30, 1385:20, 1385:43	extraction [8] - 1268:27, 1283:33, 1291:47, 1351:39, 1355:28, 1356:47, 1362:42, 1363:41
escalation [1] - 1271:42		exhausted [1] - 1317:26	expert [3] - 1274:28, 1399:44, 1400:33	extractions [1] - 1290:2
essential [1] - 1379:24		exhausting [2] - 1315:29, 1317:19	expertise [2] - 1275:22, 1338:44	extraneous [1] - 1398:25
establish [1] - 1398:23		exhaustion [3] - 1278:33, 1278:46, 1279:5	explain [5] - 1285:14, 1287:44, 1328:42, 1357:6, 1394:29	extrapolate [1] - 1386:46
established [2] - 1319:11, 1398:36		exhibit [22] - 1267:36, 1270:11, 1275:43, 1281:42, 1281:43, 1301:45, 1303:38, 1303:47, 1324:1, 1351:19, 1351:26, 1367:45, 1368:6, 1377:17, 1377:40, 1386:15, 1386:21, 1391:44, 1392:5, 1392:10, 1393:18, 1393:29	explained [7] - 1279:3, 1288:13, 1327:10, 1346:30,	extreme [1] - 1379:10
estimating [1] - 1400:24	evidence-in-chief [1] - 1311:24			extremely [7] - 1302:8, 1302:38, 1311:46, 1350:24, 1378:33, 1381:11
et [2] - 1315:44, 1388:12	evidence-recovery [4] - 1363:21, 1363:27, 1364:12, 1369:41			extremes [1] - 1379:12
evaporated [1] - 1394:23	evidential [1] - 1371:3			eyes [1] - 1387:34
evasive [1] - 1330:20	evidently [1] - 1371:34			
event [8] - 1283:19, 1283:23, 1296:17, 1334:3, 1334:16, 1342:46, 1343:47, 1344:19	exact [2] - 1298:43, 1362:3			
events [14] - 1333:12, 1333:13, 1333:15, 1333:36, 1334:43, 1334:44, 1335:9, 1335:14, 1335:41, 1335:42, 1335:45,	exactly [2] - 1353:41, 1379:19			

F

face [1] - 1392:36
faces [1] - 1288:33
facial [1] - 1271:38
facing [1] - 1355:16
fact [30] - 1267:10,
1268:40, 1271:43,
1273:10, 1274:18,
1279:44, 1290:21,
1292:37, 1295:24,

1295:27, 1295:47,
1300:3, 1311:46,
1313:39, 1316:25,
1318:20, 1320:16,
1323:46, 1326:41,
1330:26, 1333:27,
1334:4, 1336:7,
1340:8, 1340:14,
1344:33, 1345:31,
1346:1, 1349:29,
1370:40
factors [7] - 1282:29,
1282:30, 1282:35,
1317:8, 1317:27,
1317:44, 1318:26
facts [2] - 1336:30,
1336:37
failed [7] - 1284:31,
1284:36, 1286:11,
1286:29, 1287:9,
1289:30, 1289:31
failing [1] - 1284:34
failure [2] - 1287:13,
1370:36
fair [3] - 1282:9,
1286:23, 1362:18
fairly [2] - 1329:40,
1338:3
fall [1] - 1324:22
falling [1] - 1293:24
fallout [1] - 1299:3
falls [1] - 1324:24
familiar [1] - 1268:8
fantastic [2] -
1361:20, 1361:47
far [5] - 1310:7,
1315:27, 1325:19,
1369:6, 1393:37
favour [1] - 1360:1
feared [1] - 1311:16
fearful [3] - 1302:8,
1302:39, 1307:29
February [11] -
1267:43, 1268:20,
1268:24, 1268:32,
1284:6, 1302:1,
1352:18, 1352:23,
1352:25, 1352:38,
1354:21
feedback [31] -
1340:21, 1340:41,
1340:44, 1341:6,
1341:13, 1341:30,
1371:6, 1376:29,
1376:36, 1376:45,
1377:2, 1377:3,
1383:16, 1383:23,
1383:28, 1387:13,
1387:20, 1388:9,
1388:13, 1388:19,
1388:20, 1389:1,
1389:9, 1389:18,
1392:21, 1394:1,
1396:29, 1396:39,
1397:25
fellow [2] - 1340:9,
1349:43
felt [41] - 1271:24,
1273:11, 1274:18,
1274:20, 1275:33,
1278:37, 1282:17,
1282:19, 1287:31,
1287:33, 1288:16,
1288:31, 1288:32,
1288:39, 1296:8,
1298:21, 1302:13,
1302:26, 1302:27,
1302:29, 1310:13,
1310:35, 1311:4,
1311:7, 1327:14,
1329:13, 1338:14,
1344:15, 1344:19,
1344:34, 1350:15,
1350:22, 1355:21,
1355:22, 1356:20,
1360:6, 1374:47,
1375:35, 1375:41,
1376:44, 1377:2
few [22] - 1275:31,
1277:39, 1277:41,
1292:24, 1294:43,
1300:17, 1317:7,
1345:40, 1352:10,
1353:3, 1353:9,
1353:17, 1354:16,
1360:21, 1361:18,
1366:11, 1373:47,
1374:32, 1382:12,
1384:12, 1392:31,
1395:11
fewer [1] - 1318:43
figure [4] - 1276:47,
1314:42, 1315:8,
1355:4
figures [1] - 1315:23
final [12] - 1290:13,
1299:18, 1308:43,
1350:10, 1363:11,
1385:29, 1390:10,
1390:14, 1390:17,
1390:19, 1395:34,
1396:2
finalise [1] - 1365:12
finalised [2] - 1390:1,
1394:23
finally [2] - 1383:8,
1395:29
findings [1] - 1287:39
fine [8] - 1275:40,
1320:20, 1320:23,
1320:27, 1380:11,
1389:8, 1389:15,
1389:20
finish [2] - 1345:9,
1347:7
finished [3] - 1395:22,
1396:14, 1400:11
firm [1] - 1353:5
first [46] - 1266:3,
1273:10, 1274:20,
1277:29, 1278:43,
1282:7, 1283:22,
1283:30, 1285:3,
1287:30, 1289:25,
1291:33, 1292:45,
1295:2, 1305:32,
1305:34, 1314:5,
1320:10, 1339:15,
1351:14, 1351:19,
1351:37, 1351:43,
1351:46, 1353:42,
1355:27, 1360:26,
1365:34, 1365:37,
1366:1, 1367:27,
1367:36, 1369:10,
1377:20, 1377:27,
1380:20, 1382:18,
1383:14, 1383:22,
1384:12, 1387:40,
1388:46, 1399:32,
1400:34
firstly [3] - 1341:20,
1347:13, 1377:47
fishing [1] - 1307:23
fit [1] - 1307:18
five [8] - 1284:12,
1284:15, 1284:16,
1284:24, 1284:25,
1285:2, 1286:32
five-month [3] -
1284:12, 1284:15,
1284:25
fix [3] - 1363:36,
1363:39, 1369:18
fixed [1] - 1366:8
flourishing [2] -
1333:43, 1333:45
flow [1] - 1388:34
fluid [1] - 1291:41
focus [3] - 1360:10,
1360:39, 1384:45
focusing [1] - 1354:21
follow [10] - 1267:22,
1274:18, 1279:29,
1328:25, 1334:39,
1374:22, 1374:24,
1374:29, 1376:4,
1384:42
follow-on [1] -
1274:18
follow-up [5] -
1328:25, 1334:39,
1374:22, 1374:24,
1376:4
followed [1] - 1349:35
following [4] -
1276:26, 1283:44,
1288:27, 1299:28
forensic [11] -
1267:41, 1307:41,
1313:43, 1314:9,
1321:47, 1353:47,
1361:14, 1379:26,
1380:9, 1380:13,
1380:39
FORENSIC [1] -
1265:6
Forensic [5] -
1266:14, 1267:42,
1308:16, 1308:25,
1351:11
forensic-register [3] -
1314:9, 1380:9,
1380:13
form [10] - 1269:35,
1337:25, 1337:26,
1379:38, 1380:7,
1380:8, 1394:45,
1396:1, 1399:5,
1399:9
formal [1] - 1272:20
formality [1] - 1304:44
formulate [1] - 1367:7
formulated [3] -
1295:16, 1295:22,
1340:22
forth [3] - 1371:6,
1389:47
fortunately [1] -
1287:19
forum [2] - 1282:12,
1341:35
forward [13] -
1272:34, 1279:27,
1308:14, 1308:40,
1311:11, 1324:21,
1341:23, 1346:40,
1366:13, 1376:9,
1384:41, 1394:11,
1396:4
forward-looking [2] -
1384:41, 1394:11
forwarded [2] -
1377:28, 1383:14
forwarding [1] -
1367:19
forwards [1] - 1383:7
four [9] - 1276:32,
1319:1, 1370:41,
1386:2, 1386:8,
1396:42, 1397:29,
1397:31, 1397:34
four-person [1] -
1276:32
fourth [4] - 1384:18,
1385:29, 1396:25,
1398:8
frame [2] - 1306:14,
1307:17
frames [1] - 1338:26
frank [1] - 1341:30
free [4] - 1270:34,
1310:4, 1350:33
frequent [1] - 1319:21
frequently [1] -
1326:38
FRIDAY [1] - 1401:9
friend [4] - 1299:4,
1335:31, 1337:13,
1346:5
friends [3] - 1290:25,
1297:17, 1307:6
friendship [1] -
1293:33
friendships [1] -
1292:13
FRIT [17] - 1300:39,
1300:42, 1300:44,
1321:45, 1322:19,
1322:46, 1323:1,
1323:7, 1323:16,
1323:23, 1323:26,
1323:32, 1323:39,
1347:10, 1347:13,
1347:15
froing [1] - 1397:38
FROM [5] - 1367:47,
1368:8, 1377:24,
1391:46, 1393:20
front [4] - 1288:30,
1344:21, 1344:23,
1382:42
frustrated [2] -
1359:6, 1361:36
FSS [4] - 1277:20,
1338:24, 1381:21,
1386:3
FSS.0001.0013.2498
[1] - 1386:24
FSS.0001.0013.2498]
[1] - 1382:42
FSS.0001.0013.2516
[1] - 1386:24
FSS.0001.0013.2516]
[1] - 1384:4
FSS.0001.0013.2524
[2] - 1385:3, 1386:25
FSS.0001.0013.2544
[1] - 1386:25
FSS.0001.0013.2544]

[1] - 1385:29
FSS.0001.0052.8289
 [1] - 1368:1
FSS.0001.0052.8289]
 [1] - 1366:25
fuck's [2] - 1343:43,
 1344:11
fucker [4] - 1323:26,
 1323:33, 1323:39,
 1323:41
fuckers [10] - 1300:36,
 1322:19, 1322:46,
 1323:7, 1323:16,
 1323:23, 1339:29,
 1339:39, 1347:10,
 1347:13
fuckers" [4] - 1300:40,
 1300:44, 1321:45,
 1323:1
full [13] - 1278:38,
 1310:44, 1314:29,
 1315:1, 1315:5,
 1315:9, 1315:12,
 1315:15, 1315:26,
 1315:28, 1316:6,
 1316:38, 1319:40
fullest [2] - 1279:11,
 1315:44
fully [2] - 1294:25,
 1357:12
funny [1] - 1345:37
future [3] - 1278:42,
 1384:38, 1394:12

G

gained [1] - 1338:47
Gallagher [1] -
 1329:40
gap [1] - 1380:23
gather [2] - 1354:38,
 1383:5
gathering [2] -
 1354:46, 1378:31
general [8] - 1279:33,
 1301:16, 1301:19,
 1301:41, 1307:37,
 1326:7, 1341:22,
 1348:27
generally [6] -
 1313:25, 1330:35,
 1332:27, 1344:1,
 1369:39
generate [1] - 1272:29
generated [3] -
 1272:12, 1280:36,
 1386:37
generating [1] -
 1280:33
George [1] - 1265:15

German [1] - 1320:17
Germany [1] - 1320:13
given [37] - 1275:19,
 1282:36, 1283:26,
 1283:28, 1283:30,
 1288:9, 1292:40,
 1294:15, 1297:14,
 1297:32, 1297:33,
 1304:38, 1309:12,
 1310:9, 1310:11,
 1320:35, 1322:9,
 1322:23, 1324:20,
 1324:38, 1325:9,
 1325:12, 1327:8,
 1327:22, 1331:27,
 1331:45, 1335:7,
 1336:2, 1336:6,
 1341:30, 1350:11,
 1350:20, 1372:21,
 1374:47, 1379:30,
 1394:20, 1398:44
Gladstone [2] -
 1283:7, 1286:41
gleaned [1] - 1337:12
Golf [14] - 1283:2,
 1284:30, 1284:37,
 1286:27, 1288:30,
 1288:37, 1289:2,
 1289:22, 1299:32,
 1337:47, 1343:41,
 1344:15, 1351:47,
 1352:37
gosh [1] - 1375:41
grateful [1] - 1381:17
great [2] - 1275:31,
 1294:24
great" [1] - 1325:46
greater [1] - 1379:25
Gregg [6] - 1266:22,
 1279:24, 1279:26,
 1279:29, 1281:41,
 1282:9
gripes [1] - 1325:30
ground [1] - 1394:13
group [18] - 1300:28,
 1301:2, 1308:36,
 1324:24, 1324:29,
 1324:31, 1324:36,
 1326:45, 1346:12,
 1347:9, 1349:31,
 1353:32, 1355:17,
 1356:8, 1362:29,
 1384:23, 1385:21,
 1385:44
grumble [1] - 1332:27
grumbling [1] -
 1332:22
guess [10] - 1314:21,
 1315:22, 1319:14,
 1350:15, 1353:34,

1359:17, 1360:25,
 1361:33, 1363:19,
 1363:37
guidance [1] -
 1317:44
guide [1] - 1317:45
guideline [1] -
 1317:32
guys [1] - 1341:33

H

half [3] - 1268:46,
 1342:1, 1351:15
halfway [2] - 1357:19,
 1365:13
hand [1] - 1316:5
hands [3] - 1334:17,
 1337:27, 1394:6
handwritten [1] -
 1348:38
hang [2] - 1359:22,
 1373:23
happy [6] - 1310:26,
 1332:18, 1347:42,
 1375:2, 1381:27,
 1390:6
hard [3] - 1270:12,
 1361:20, 1361:33
harmony [3] -
 1307:41, 1309:17,
 1310:14
harnessed [1] -
 1285:20
harp [1] - 1368:42
hat [1] - 1359:22
head [3] - 1297:35,
 1297:36, 1371:26
headed [1] - 1378:26
heading [2] - 1283:2,
 1300:3
heads [1] - 1375:29
Health [7] - 1266:14,
 1267:42, 1301:41,
 1307:38, 1333:42,
 1377:12, 1378:7
health [1] - 1272:42
hear [5] - 1310:23,
 1324:4, 1324:6,
 1362:7, 1379:17
heard [22] - 1269:17,
 1278:43, 1300:27,
 1310:19, 1315:30,
 1316:39, 1316:41,
 1317:22, 1324:3,
 1324:37, 1332:21,
 1339:28, 1339:34,
 1339:35, 1341:32,
 1341:34, 1361:18,
 1361:46, 1362:8,

1362:20, 1362:23,
 1394:29
hearing [4] - 1281:24,
 1350:34, 1399:10,
 1399:11
hearings [1] - 1351:14
Hedge [6] - 1265:33,
 1350:45, 1372:38,
 1382:15, 1399:40,
 1401:1
HEDGE [28] - 1350:47,
 1351:5, 1351:7,
 1351:24, 1351:31,
 1358:46, 1366:21,
 1367:36, 1367:42,
 1368:3, 1368:12,
 1370:44, 1372:43,
 1373:4, 1373:9,
 1376:1, 1377:15,
 1377:19, 1377:27,
 1377:37, 1377:42,
 1378:11, 1378:18,
 1399:43, 1400:6,
 1400:30, 1400:43,
 1401:4
held [4] - 1278:33,
 1301:14, 1319:37,
 1340:24
Helen [3] - 1266:22,
 1279:24, 1282:9
help [4] - 1302:9,
 1306:11, 1347:27,
 1382:7
helped [2] - 1397:27,
 1397:32
helpful [4] - 1334:1,
 1380:8, 1380:35,
 1398:47
hence [1] - 1363:21
here" [1] - 1274:40
herself [1] - 1382:28
hesitant [1] - 1381:14
Hickey [12] - 1320:6,
 1323:43, 1330:15,
 1332:32, 1338:33,
 1342:17, 1342:18,
 1345:9, 1345:14,
 1347:27, 1400:21,
 1400:32
HICKEY [38] - 1320:8,
 1320:10, 1323:45,
 1324:15, 1324:26,
 1325:1, 1325:16,
 1325:22, 1325:28,
 1325:35, 1325:39,
 1327:38, 1330:22,
 1332:34, 1332:39,
 1334:29, 1334:33,
 1336:43, 1337:5,
 1337:15, 1337:20,

1338:35, 1339:2,
 1339:12, 1339:18,
 1341:43, 1342:1,
 1342:6, 1342:14,
 1342:20, 1345:12,
 1345:23, 1346:42,
 1347:42, 1347:46,
 1348:4, 1400:23,
 1400:36
high [7] - 1276:36,
 1361:19, 1361:46,
 1362:17, 1371:33,
 1371:35, 1378:3
high-output [1] -
 1362:17
higher [3] - 1278:8,
 1319:38, 1356:40
highest [4] - 1276:46,
 1276:47, 1328:27,
 1328:31
highlight [2] -
 1299:18, 1389:27
highlighted [2] -
 1397:11, 1398:10
highlighting [2] -
 1380:3, 1397:12
himself [1] - 1375:10
historical [1] -
 1309:43
history [4] - 1271:22,
 1338:32, 1381:8,
 1383:12
hmm [1] - 1338:1
hoc [2] - 1352:7,
 1352:9
Hodge [1] - 1265:30
hold [3] - 1290:4,
 1319:34, 1342:15
holding [1] - 1279:16
holiday [1] - 1304:47
holidays [1] - 1297:26
Holz [5] - 1340:9,
 1349:16, 1375:11,
 1375:20, 1376:12
home [1] - 1355:15
Hon [1] - 1265:26
honest [1] - 1341:32
honesty [1] - 1337:29
Honour [1] - 1266:14
Honour's [1] -
 1266:12
honours [1] - 1266:39
hope [2] - 1309:21,
 1311:9
hoped [1] - 1343:12
hopeful [1] - 1310:23
hopefully [1] -
 1294:17
hoping [1] - 1331:47
horrified [2] - 1269:6,

1289:47	1363:19, 1364:11	implemented [5] -	1356:21, 1382:16,	1374:16, 1380:9,
hour [6] - 1361:1,		1292:25, 1292:41,	1383:1, 1384:15,	1380:35, 1380:40,
1373:38, 1373:39,		1330:8, 1363:45,	1384:45, 1385:13,	1381:5, 1381:10,
1373:43, 1398:12,		1364:6	1385:39	1383:43, 1384:31,
1400:25		implication [1] -	inconceivable [1] -	1399:5
hours [5] - 1329:46,	ice [1] - 1305:1	1302:14	1319:39	information-
1330:11, 1330:19,	ice-breaker [1] -	implications [1] -	incorporate [1] -	gathering [1] -
1330:23, 1330:26	1305:1	1336:35	1387:20	1354:46
HOWES [1] - 1368:9	idea [9] - 1303:41,	imply [2] - 1324:45,	incorporated [1] -	informed [3] - 1312:9,
Howes [22] - 1277:23,	1304:31, 1315:14,	1349:8	1391:15	1377:29, 1380:46
1277:27, 1278:11,	1318:3, 1344:34,	implying [1] - 1347:16	incorporating [1] -	informing [2] -
1283:37, 1283:40,	1356:35, 1357:35,	important [16] -	1383:15	1317:39, 1375:28
1288:24, 1299:32,	1368:36, 1384:29	1282:17, 1282:19,	incorrect [1] - 1287:15	Ingrid [7] - 1266:4,
1313:4, 1320:31,	ideas [5] - 1308:39,	1282:22, 1282:24,	incorrectly [1] -	1266:27, 1266:34,
1331:7, 1331:12,	1367:22, 1367:23,	1300:6, 1326:1,	1295:35	1289:2, 1344:41,
1331:25, 1331:44,	1395:19, 1396:11	1329:13, 1330:28,	increase [3] - 1294:45,	1353:12, 1355:18
1338:23, 1340:40,	identification [1] -	1335:8, 1359:6,	1378:44, 1379:3	INGRID [2] - 1266:30,
1343:42, 1344:18,	1322:9	1359:15, 1368:41,	increases [1] -	1267:38
1344:33, 1347:12,	identified [5] -	1379:47, 1380:45,	1315:44	inhibitors [1] -
1347:23, 1366:38,	1286:45, 1295:8,	1380:46	incredibly [1] - 1300:6	1285:22
1368:4	1367:23, 1368:45,	importantly [1] -	indeed [1] - 1324:29	initial [12] - 1276:26,
Howes' [1] - 1271:25	1370:7	1379:46	independent [3] -	1291:38, 1321:7,
HR [7] - 1299:11,	identify [7] - 1324:17,	imposed [1] - 1280:8	1340:23, 1341:5,	1321:20, 1358:47,
1299:12, 1301:1,	1324:23, 1332:14,	impression [3] -	1341:17	1369:24, 1369:36,
1301:6, 1301:41,	1352:33, 1364:22,	1337:25, 1345:28,	indicate [2] - 1330:28,	1383:6, 1384:24,
1303:22, 1374:20	1391:39, 1399:12	1376:17	1392:29	1387:5, 1387:13,
human [2] - 1337:40,	identifying [3] -	improperly [1] -	indicating [1] -	1389:15
1337:43	1370:36, 1378:42,	1346:2	1367:28	initials [1] - 1266:11
humiliated [1] -	1380:33	improve [3] - 1308:29,	indication [3] -	initiated [2] - 1284:17,
1343:28	lentile [2] - 1359:46,	1308:35, 1308:46	1398:43, 1399:45,	1284:24
humiliating [2] -	1360:3	improvement [3] -	1400:6	input [2] - 1313:4,
1289:4, 1344:23	IM-03 [1] - 1270:11	1284:11, 1284:13,	individual [7] -	1313:8
humour [1] - 1345:36	IM-06 [1] - 1274:26	1309:21	1349:36, 1349:39,	inquiries [3] -
hundred [1] - 1353:17	IM-10 [1] - 1290:8	improvements [2] -	1361:8, 1361:12,	1381:18, 1381:35,
Hunt [21] - 1290:43,	IM-11 [2] - 1341:37,	1379:24, 1380:38	1361:34, 1362:20,	1400:30
1371:9, 1382:11,	1348:35	IN [1] - 1265:6	1362:30	inquiry [2] - 1310:20,
1386:30, 1387:6,	IM-12 [1] - 1301:45	in-depth [1] - 1330:42	individuals [1] -	1324:16
1387:29, 1387:43,	IM-13 [2] - 1303:38,	in-tube [2] - 1379:9,	1324:27	INQUIRY [1] - 1265:4
1388:19, 1390:3,	1303:47	1379:20	industrial [1] -	Inquiry [5] - 1273:24,
1390:44, 1392:20,	imagine [2] - 1334:2,	inaction [2] - 1296:14,	1373:13	1310:17, 1333:15,
1392:37, 1393:4,	1345:39	1310:1	infer [2] - 1295:40,	1333:21, 1346:7
1393:17, 1393:24,	immature [1] -	inadvertently [1] -	1324:42	inserted [1] - 1310:4
1393:26, 1393:28,	1308:38	1399:36	inference [2] - 1337:1,	Inspector [2] -
1395:20, 1395:33,	immediate [2] -	inappropriate [5] -	1337:38	1381:30, 1399:32
1396:9, 1396:35	1292:32, 1381:6	1302:13, 1302:24,	inform [2] - 1273:7,	inspire [1] - 1299:35
HUNT [2] - 1393:20,	immediately [3] -	1305:20, 1331:26,	1317:32	instance [11] -
1393:31	1269:8, 1283:36,	1345:31	informally [1] - 1305:7	1273:10, 1274:20,
Hunt's [1] - 1397:25	1377:46	incident [4] - 1296:7,	information [33] -	1281:8, 1291:31,
Hunter [3] - 1311:32,	impact [5] - 1269:5,	1296:8, 1306:40,	1272:33, 1272:34,	1291:32, 1291:33,
1378:21, 1381:4	1275:3, 1287:19,	1365:46	1272:41, 1297:33,	1296:9, 1314:6,
HUNTER [12] -	1317:13, 1371:2	include [2] - 1284:36,	1302:12, 1302:29,	1329:37, 1353:42,
1311:34, 1311:36,	impacted [1] - 1294:1	1322:20	1303:40, 1304:37,	1382:8
1315:32, 1378:23,	impacting [1] -	included [4] -	1304:39, 1305:14,	instances [2] -
1378:25, 1381:2,	1283:24	1276:29, 1322:27,	1305:45, 1307:24,	1278:37, 1344:24
1381:10, 1381:25,	imparted [1] - 1302:12	1396:44, 1398:14	1313:43, 1315:21,	instead [1] - 1275:33
1381:30, 1381:35,	imparting [1] -	includes [3] -	1317:16, 1326:2,	instigated [2] -
1399:29, 1399:36	1302:29	1322:39, 1322:40,	1326:13, 1334:39,	1284:11, 1328:2
hurt [1] - 1337:30	impediments [1] -	1396:34	1335:19, 1336:16,	instruct [1] - 1324:32
Hussein [1] - 1289:22	1324:33	including [9] -	1354:39, 1354:46,	instructed [1] -
hypothesis [2] -	implement [2] -	1293:15, 1329:18,	1369:13, 1372:29,	1266:11
	1348:29			

instructions [2] -
1339:3, 1381:4
insufficient [2] -
1281:14, 1360:27
integrity [6] - 1284:31,
1288:10, 1335:19,
1337:29, 1354:18,
1359:24
intel [1] - 1338:9
intelligence [2] -
1268:4, 1321:47
intend [3] - 1329:16,
1341:16, 1341:29
intended [2] -
1345:30, 1346:46
intending [1] - 1344:1
intensive [2] -
1292:31, 1332:19
intent [2] - 1325:31,
1398:23
intention [4] - 1273:5,
1273:7, 1273:10,
1389:42
interaction [4] -
1316:44, 1326:45,
1350:7, 1375:24
interactions [2] -
1326:45, 1327:26
interception [1] -
1298:24
interest [13] - 1271:8,
1271:12, 1272:9,
1272:12, 1272:20,
1272:25, 1272:28,
1272:31, 1272:33,
1272:40, 1273:11,
1336:36, 1337:36
Interest [1] - 1272:24
interested [9] -
1282:16, 1316:25,
1316:42, 1324:7,
1329:23, 1335:13,
1337:11, 1337:18,
1379:17
interesting [4] -
1363:30, 1363:35,
1369:13, 1369:17
interim [1] - 1370:32
internal [5] - 1291:10,
1291:32, 1291:42,
1294:41, 1295:3
interpose [1] - 1400:3
interpret [1] - 1317:14
interpretation [3] -
1287:43, 1316:9,
1316:17
interpretations [1] -
1361:16
interrupt [2] -
1326:26, 1345:4

interview [2] - 1306:3,
1340:32
interviewed [3] -
1301:14, 1301:16,
1302:16
interviews [5] -
1340:23, 1341:16,
1341:20, 1341:21,
1349:36
INTO [1] - 1265:6
introduced [4] -
1366:17, 1392:36,
1393:2
introduction [3] -
1384:19, 1385:17,
1385:41
investigate [5] -
1286:21, 1294:25,
1354:8, 1363:27,
1389:28
investigated [10] -
1271:14, 1271:24,
1284:45, 1286:25,
1286:28, 1287:21,
1294:13, 1310:26,
1315:18, 1397:5
investigating [1] -
1333:21
investigation [13] -
1287:20, 1291:16,
1293:14, 1294:18,
1348:34, 1352:8,
1352:20, 1353:1,
1353:7, 1353:30,
1354:44, 1355:1,
1355:2
investigations [2] -
1363:30, 1383:45
investigators [1] -
1379:26
invoked [1] - 1296:6
involved [15] - 1282:5,
1290:34, 1290:38,
1302:32, 1304:31,
1313:5, 1337:41,
1340:43, 1340:46,
1354:15, 1354:17,
1367:30, 1370:45,
1372:30, 1394:16
involvement [1] -
1340:41
involves [2] - 1285:15,
1309:4
involving [3] - 1277:4,
1396:10, 1396:11
ironic [1] - 1300:45
isolating [1] - 1285:12
issue [68] - 1269:32,
1271:17, 1274:18,
1283:40, 1284:14,

1286:21, 1286:22,
1287:44, 1287:45,
1290:18, 1290:21,
1290:39, 1291:2,
1292:31, 1292:40,
1293:12, 1293:35,
1294:8, 1294:13,
1294:16, 1297:43,
1298:26, 1298:27,
1309:32, 1309:39,
1309:42, 1317:19,
1318:17, 1319:2,
1327:15, 1329:47,
1330:12, 1331:4,
1331:8, 1331:13,
1331:16, 1331:27,
1351:37, 1351:38,
1351:46, 1352:36,
1353:4, 1353:43,
1362:34, 1362:47,
1363:4, 1363:8,
1363:16, 1363:33,
1363:38, 1363:40,
1365:10, 1365:17,
1365:18, 1365:37,
1366:2, 1366:42,
1368:41, 1368:46,
1369:18, 1369:40,
1371:2, 1377:45,
1397:21, 1399:30
issues [43] - 1268:9,
1271:26, 1275:30,
1279:36, 1282:11,
1293:3, 1294:27,
1296:11, 1296:31,
1297:42, 1299:22,
1299:24, 1299:30,
1299:35, 1300:3,
1300:13, 1300:16,
1300:17, 1300:20,
1302:20, 1309:8,
1309:27, 1310:34,
1310:47, 1311:1,
1313:38, 1320:35,
1321:38, 1322:29,
1326:15, 1328:4,
1328:5, 1333:20,
1337:43, 1342:1,
1347:17, 1348:19,
1351:32, 1352:2,
1352:8, 1368:41,
1397:5
item [1] - 1287:2
items [5] - 1308:29,
1308:45, 1378:42,
1379:10, 1379:33
itself [6] - 1326:20,
1337:41, 1383:41,
1389:30, 1392:30,
1392:40

J

Jacqui [1] - 1367:5
January [3] - 1376:33,
1377:19, 1377:21
JANUARY [1] -
1377:25
job [8] - 1280:15,
1280:35, 1281:11,
1302:44, 1306:22,
1334:46, 1342:45,
1343:2
jobs [2] - 1301:33,
1348:41
jog [2] - 1301:6,
1349:3
John [3] - 1309:7,
1328:3, 1328:6
Johnstone [1] -
1266:22
join [1] - 1339:9
joined [3] - 1339:14,
1339:20, 1359:30
joining [1] - 1338:18
joke [6] - 1344:47,
1345:20, 1345:21,
1345:25, 1345:30,
1346:1
joked [1] - 1344:41
Jones [1] - 1265:32
Joshua [1] - 1265:32
journey [1] - 1308:27
July [16] - 1290:2,
1355:44, 1366:32,
1366:38, 1367:37,
1367:45, 1368:4,
1368:12, 1370:14,
1382:16, 1382:17,
1382:29, 1383:6,
1396:24, 1396:32,
1398:6
JULY [2] - 1368:1,
1368:9
jump [1] - 1277:8
June [24] - 1268:12,
1274:3, 1275:20,
1276:26, 1277:16,
1278:12, 1280:19,
1284:6, 1292:16,
1313:16, 1313:38,
1321:19, 1352:19,
1352:28, 1353:2,
1353:5, 1354:4,
1354:21, 1382:24,
1385:9, 1388:47,
1391:14, 1391:42,
1397:43
JUNE [1] - 1391:47
jury [1] - 1288:6
justifications [7] -

1371:10, 1371:16,
1371:17, 1371:27,
1389:36, 1395:21,
1395:25
justified [1] - 1371:46
Justin [36] - 1271:25,
1274:20, 1274:30,
1275:7, 1275:22,
1275:45, 1277:9,
1278:15, 1278:16,
1283:37, 1288:24,
1288:40, 1297:4,
1297:19, 1299:32,
1320:31, 1330:45,
1331:3, 1331:10,
1331:41, 1335:36,
1335:40, 1336:10,
1337:27, 1346:12,
1346:17, 1347:12,
1347:23, 1353:42,
1355:13, 1362:8,
1362:20, 1362:23,
1367:19, 1367:29,
1368:4
JUSTIN [1] - 1368:9

K

KC [2] - 1265:26,
1265:30
keen [1] - 1299:30
keep [7] - 1299:32,
1303:34, 1304:15,
1326:5, 1326:12,
1331:20
keeping [3] - 1303:18,
1306:27, 1372:26
keeps [1] - 1361:15
Keller [21] - 1270:4,
1270:25, 1270:36,
1271:4, 1271:7,
1271:31, 1272:3,
1272:26, 1273:4,
1273:6, 1273:23,
1274:13, 1275:1,
1275:20, 1275:21,
1277:17, 1299:37,
1307:44, 1309:11,
1323:36, 1350:11
Keller's [1] - 1272:14
kept [1] - 1366:11
kind [9] - 1271:30,
1317:40, 1342:40,
1343:10, 1363:42,
1369:38, 1370:8,
1380:10, 1389:23
Kirsten [2] - 1266:20,
1367:22
knowing [2] -
1282:16, 1335:44

knowledge [4] -
1290:21, 1292:12,
1319:34, 1332:19
knows [5] - 1323:17,
1333:17, 1333:29,
1337:9
KR-07 [1] - 1372:20
Kylie [33] - 1269:7,
1272:2, 1272:4,
1283:37, 1290:28,
1292:5, 1292:8,
1293:36, 1297:34,
1297:42, 1305:18,
1305:20, 1307:4,
1308:1, 1308:40,
1321:9, 1321:28,
1321:37, 1323:12,
1323:16, 1332:26,
1334:31, 1334:42,
1335:17, 1335:18,
1335:29, 1347:22,
1350:47, 1351:7,
1368:4, 1377:21
KYLIE [4] - 1351:3,
1351:28, 1368:8,
1377:24

L

lab [30] - 1268:12,
1273:29, 1273:33,
1279:21, 1283:19,
1290:22, 1293:34,
1298:31, 1300:4,
1309:47, 1312:33,
1313:22, 1315:15,
1323:46, 1323:47,
1324:2, 1331:27,
1332:25, 1337:41,
1346:24, 1348:14,
1348:22, 1359:30,
1361:23, 1367:9,
1378:32, 1380:44,
1381:6, 1386:3
lab's [1] - 1353:47
laboratory [24] -
1278:44, 1279:13,
1280:32, 1287:28,
1288:41, 1294:16,
1297:30, 1305:36,
1309:28, 1314:32,
1315:20, 1324:11,
1328:5, 1329:45,
1345:1, 1352:17,
1360:14, 1360:22,
1378:32, 1378:42,
1386:43, 1386:45,
1397:21
labour [3] - 1292:31,
1332:19, 1360:32

labour-intensive [1] -
1292:31

lack [13] - 1287:16,
1288:1, 1308:39,
1316:26, 1316:28,
1316:32, 1317:1,
1317:30, 1319:30,
1348:14, 1350:16,
1350:17, 1382:10

language [2] -
1299:43, 1344:2

Lara [15] - 1270:4,
1270:25, 1270:36,
1271:3, 1271:13,
1271:28, 1271:30,
1271:32, 1271:34,
1272:3, 1274:13,
1274:19, 1299:37,
1307:44, 1309:11

Lara's [1] - 1328:3

large [3] - 1283:47,
1319:20, 1398:10

larger [5] - 1281:33,
1281:34, 1318:7,
1318:38, 1319:20

last [21] - 1268:46,
1318:13, 1318:15,
1333:24, 1351:19,
1359:5, 1361:5,
1361:23, 1367:29,
1376:39, 1379:37,
1390:19, 1390:22,
1390:27, 1393:9,
1394:43, 1395:23,
1395:43, 1397:8,
1399:40, 1400:43

lastly [1] - 1314:29

late [3] - 1284:6,
1382:17, 1383:6

latest [1] - 1370:13

latter [1] - 1268:46

Laura [1] - 1265:31

lawful [4] - 1303:33,
1304:35, 1372:34,
1372:38

lawyer [1] - 1306:31

LBR [1] - 1392:31

lead [2] - 1298:11,
1350:22

lead-up [1] - 1350:22

leader [5] - 1298:5,
1298:6, 1298:12,
1316:29, 1368:17

leading [1] - 1363:17

leakage [2] - 1285:32,
1285:33

learned [1] - 1346:5

least [19] - 1271:24,
1273:8, 1286:29,
1310:26, 1314:25,

1324:38, 1338:28,
1352:18, 1358:28,
1366:33, 1370:13,
1370:19, 1379:4,
1387:6, 1387:12,
1388:18, 1388:20,
1390:26
leave [19] - 1266:5,
1266:12, 1266:24,
1273:32, 1273:39,
1297:39, 1297:41,
1298:16, 1298:17,
1302:44, 1336:29,
1347:36, 1356:7,
1373:18, 1377:30,
1382:29, 1382:34,
1394:5, 1400:40
leaving [2] - 1353:45,
1357:40
led [1] - 1327:32
left [7] - 1306:16,
1356:3, 1356:24,
1356:31, 1357:10,
1373:24, 1399:46
legal [3] - 1304:16,
1304:34, 1307:29
legislation [1] -
1373:2
legislative [1] -
1372:45
legitimate [1] -
1299:21
lend [1] - 1318:19
length [2] - 1363:13,
1369:46
lengthy [2] - 1330:33,
1400:28
less [3] - 1279:17,
1315:6
letter [1] - 1304:25
Level [1] - 1265:15
level [10] - 1271:25,
1273:7, 1311:38,
1316:11, 1317:34,
1319:36, 1332:26,
1348:15, 1355:3
levels [1] - 1317:15
liar [1] - 1335:11
library [8] - 1297:8,
1297:12, 1301:10,
1302:33, 1302:36,
1302:40, 1335:37,
1374:31
life [1] - 1375:3
lift [1] - 1357:9
lifted [1] - 1398:10
lifts [1] - 1380:4
light [5] - 1284:14,
1295:11, 1300:14,
1300:16, 1305:34

likelihood [2] -
1276:36, 1276:46
likely [6] - 1274:21,
1276:39, 1324:4,
1369:40, 1371:42,
1395:14
limited [3] - 1322:3,
1381:10, 1394:9
line [11] - 1269:41,
1283:36, 1292:4,
1321:8, 1324:16,
1328:43, 1329:24,
1331:7, 1336:10,
1348:20, 1367:29
linked [1] - 1274:44
liquid [3] - 1286:5,
1286:6, 1286:12
list [7] - 1276:11,
1280:41, 1308:17,
1314:1, 1319:15,
1346:41, 1360:43
listen [1] - 1311:7
listened [4] - 1294:11,
1294:12, 1376:17,
1376:22
lists [4] - 1269:23,
1280:27, 1319:15,
1336:9
literally [1] - 1323:41
livelihoods [1] -
1302:13
locked [1] - 1305:36
Lok [3] - 1376:29,
1377:19, 1377:28
look [49] - 1269:27,
1273:8, 1274:24,
1279:8, 1280:28,
1280:39, 1281:9,
1281:11, 1282:8,
1283:28, 1283:29,
1288:47, 1293:14,
1294:33, 1295:46,
1301:47, 1312:47,
1313:7, 1314:44,
1315:19, 1315:20,
1316:7, 1317:7,
1317:46, 1318:23,
1318:24, 1319:19,
1322:28, 1332:46,
1340:43, 1341:32,
1349:5, 1349:45,
1353:35, 1355:35,
1360:5, 1361:22,
1371:19, 1373:4,
1374:30, 1375:38,
1377:34, 1380:15,
1380:45, 1383:20,
1384:18, 1387:34,
1388:40, 1391:12
looked [8] - 1280:25

1292:25, 1293:25,
1296:39, 1310:24,
1348:24, 1352:33,
1391:33
looking [30] - 1276:14,
1277:28, 1280:35,
1280:39, 1281:1,
1283:25, 1283:31,
1293:46, 1300:10,
1316:19, 1318:12,
1318:21, 1352:11,
1352:43, 1354:38,
1354:39, 1368:28,
1369:16, 1377:27,
1380:20, 1383:12,
1384:41, 1384:45,
1388:9, 1391:15,
1392:35, 1392:47,
1394:11, 1396:43,
1397:43
looks [2] - 1324:1,
1393:6
lose [2] - 1302:43,
1313:39
lost [3] - 1344:42,
1344:45, 1345:31
low [8] - 1312:14,
1312:33, 1312:44,
1313:6, 1313:12,
1313:17, 1313:29,
1313:40
Luke [2] - 1266:21,
1387:29
Luke's [1] - 1397:25
lunch [1] - 1298:45
lysis [9] - 1291:25,
1291:45, 1292:27,
1294:44, 1332:23,
1363:23, 1364:2,
1364:3, 1364:15

M

Magistrates [1] -
1265:14
magnet [3] - 1285:15,
1285:19, 1285:22
magnetic [1] -
1285:15
main [2] - 1368:16,
1379:20
major [3] - 1287:28,
1294:10, 1338:19
majority [1] - 1268:46
maker [1] - 1282:4
maladministration [1]
- 1272:39
male [4] - 1291:8,
1371:40, 1371:42,
1371:44

manage [2] - 1280:28, 1384:37	1382:44	1362:18, 1364:18, 1375:8, 1379:6, 1379:18, 1379:43, 1380:22, 1390:22, 1397:2	1375:39, 1376:1, 1376:2, 1376:10, 1382:22	1318:37, 1318:41
managed [1] - 1397:4	matching [1] - 1371:44			merits [1] - 1281:24
management [48] - 1269:38, 1271:25, 1274:39, 1281:24, 1297:44, 1298:37, 1299:39, 1300:23, 1302:28, 1310:40, 1312:46, 1314:1, 1318:4, 1324:46, 1326:46, 1336:22, 1338:12, 1338:21, 1353:37, 1353:40, 1354:26, 1354:29, 1354:33, 1355:46, 1356:7, 1356:11, 1356:21, 1356:35, 1356:40, 1358:46, 1359:2, 1360:44, 1361:22, 1361:31, 1363:18, 1365:47, 1366:9, 1368:46, 1376:44, 1382:38, 1382:47, 1383:28, 1383:38, 1384:11, 1385:10, 1385:35, 1393:46	material [4] - 1268:7, 1322:4, 1399:12, 1399:13		meetings [15] - 1288:30, 1289:3, 1301:14, 1326:22, 1326:46, 1326:47, 1327:1, 1340:37, 1343:26, 1354:26, 1354:29, 1354:33, 1361:22, 1361:32, 1375:8	met [2] - 1309:8, 1349:31
	maternity [1] - 1382:29	meaningful [2] - 1278:13, 1278:14		method [2] - 1291:47, 1399:20
	matter [26] - 1270:9, 1271:13, 1277:4, 1277:16, 1287:24, 1287:29, 1292:8, 1292:26, 1292:44, 1303:17, 1303:29, 1303:35, 1304:7, 1304:15, 1306:26, 1321:29, 1321:32, 1336:26, 1337:2, 1359:24, 1363:31, 1369:14, 1372:25, 1374:14, 1394:16, 1395:19	means [6] - 1284:14, 1284:24, 1285:12, 1395:27, 1399:11, 1399:15	member [8] - 1299:20, 1322:45, 1322:46, 1322:47, 1323:19, 1323:20, 1338:19, 1352:1	Michael [1] - 1265:30
	matters [14] - 1271:23, 1275:6, 1311:38, 1311:45, 1311:47, 1312:4, 1317:24, 1336:30, 1336:36, 1337:36, 1382:8, 1392:41, 1395:10, 1398:26	meant [9] - 1278:2, 1280:26, 1287:45, 1305:38, 1346:38, 1346:40, 1368:47, 1374:45, 1397:23	member's [1] - 1361:16	Michel [4] - 1376:29, 1377:19, 1377:28, 1377:29
	Matthew [7] - 1290:43, 1371:9, 1372:1, 1372:2, 1372:3, 1390:3, 1397:25	measure [2] - 1361:29, 1361:33	members [21] - 1269:23, 1299:23, 1302:5, 1310:39, 1310:43, 1322:20, 1323:6, 1323:8, 1323:10, 1323:47, 1326:24, 1332:21, 1337:40, 1340:45, 1341:1, 1344:22, 1351:47, 1362:15, 1370:15, 1385:10	mickey [3] - 1345:40, 1345:44, 1345:47
manager [19] - 1269:7, 1269:9, 1269:41, 1283:36, 1292:4, 1297:14, 1301:41, 1303:22, 1323:21, 1328:43, 1331:8, 1334:38, 1341:32, 1341:34, 1348:20, 1353:15, 1359:18, 1359:26, 1362:25	MAY [1] - 1392:13	meet [2] - 1303:16, 1372:25	memo [2] - 1279:30, 1279:32	micro [23] - 1274:45, 1277:31, 1277:45, 1278:3, 1312:13, 1312:22, 1312:44, 1313:6, 1313:13, 1313:18, 1313:40, 1314:16, 1314:20, 1314:29, 1314:40, 1314:42, 1315:42, 1316:5, 1316:6, 1316:38, 1317:33, 1319:31, 1319:35
managers [11] - 1292:9, 1308:30, 1309:4, 1321:8, 1321:30, 1334:37, 1336:10, 1348:28, 1353:14, 1353:21	MCKENZIE [1] - 1400:19	meeting [80] - 1269:38, 1270:7, 1270:41, 1270:44, 1270:47, 1271:25, 1279:20, 1279:22, 1279:28, 1279:37, 1281:40, 1292:16, 1297:44, 1301:17, 1301:19, 1301:23, 1301:37, 1302:12, 1302:26, 1302:27, 1302:29, 1303:5, 1303:11, 1303:21, 1304:7, 1304:38, 1305:15, 1305:21, 1305:28, 1305:31, 1306:30, 1307:10, 1307:15, 1307:16, 1328:20, 1328:25, 1334:21, 1334:25, 1335:30, 1339:47, 1340:4, 1340:8, 1340:14, 1340:22, 1340:42, 1342:21, 1355:43, 1355:45, 1355:46, 1356:8, 1356:20, 1356:30, 1365:47, 1366:10, 1368:46, 1372:10, 1372:16, 1373:13, 1373:29, 1373:35, 1373:45, 1374:12, 1374:20, 1374:28, 1374:33, 1375:7, 1375:9, 1375:10, 1375:15, 1375:20, 1375:23, 1375:25, 1375:30, 1375:36,	memory [15] - 1270:3, 1301:6, 1323:12, 1333:36, 1349:3, 1353:11, 1353:42, 1354:10, 1354:33, 1356:19, 1369:39, 1369:43, 1383:21, 1389:47, 1393:36	micro-concentrate [1] - 1317:33
	MCNEVIN [1] - 1367:47		memories [2] - 1353:11, 1389:39	micro-concentrated [7] - 1277:31, 1312:22, 1313:40, 1314:16, 1314:42, 1319:31, 1319:35
	McNevin [14] - 1266:21, 1292:18, 1323:19, 1323:32, 1332:15, 1343:37, 1343:39, 1367:42, 1367:44, 1368:13, 1368:16, 1370:22, 1383:6, 1383:21		mention [6] - 1281:41, 1309:27, 1317:37, 1347:14, 1376:28, 1396:41	micro-concentrating [6] - 1278:3, 1313:13, 1314:40, 1316:5, 1316:6, 1316:38
managing [8] - 1302:20, 1337:42, 1353:14, 1356:22, 1359:11, 1359:42, 1360:18, 1397:21	mean [34] - 1268:42, 1288:37, 1294:12, 1294:14, 1302:39, 1306:4, 1310:34, 1313:34, 1314:21, 1315:6, 1317:1, 1317:7, 1322:16, 1323:9, 1325:24, 1326:29, 1334:27, 1346:39, 1347:32, 1352:32, 1358:11, 1360:4, 1361:12,		mentioned [17] - 1272:28, 1287:26, 1288:30, 1317:18, 1317:35, 1318:5, 1318:37, 1329:43, 1336:19, 1344:34, 1355:12, 1356:39, 1359:15, 1360:26, 1373:21, 1376:16, 1396:20	micro-concentration [9] - 1274:45, 1277:45, 1312:13, 1312:44, 1313:6, 1313:18, 1314:20, 1314:29, 1315:42
manifested [1] - 1326:20				microcon [13] - 1274:4, 1277:37, 1278:35, 1278:38, 1279:43, 1280:2, 1314:22, 1314:45, 1314:47, 1315:1, 1315:5, 1315:12, 1315:15
manner [2] - 1326:16, 1391:26				microconned [5] - 1268:37, 1274:1, 1313:36, 1314:6, 1348:15
March [7] - 1269:46, 1270:4, 1299:37, 1309:13, 1385:31, 1385:35				microconning [5] - 1276:15, 1278:5, 1279:10, 1315:26, 1315:28
marked [2] - 1303:13,			mentioning [1] - 1288:37	microlitre [4] - 1278:35, 1330:46, 1331:34, 1331:42
			merit [5] - 1281:32, 1318:6, 1318:10,	

microlitres [7] - 1278:40, 1313:46, 1315:2, 1315:8, 1315:10, 1332:5, 1332:6	minimal [1] - 1371:28	MOH [1] - 1392:31	1307:11, 1312:38, 1336:40, 1373:21	nevertheless [1] - 1341:7
microscope [2] - 1294:33, 1295:10	minister [1] - 1275:2	moment [10] - 1310:10, 1315:20, 1325:25, 1343:40, 1346:27, 1347:29, 1379:8, 1381:15, 1386:33, 1390:11	names [1] - 1266:15	Neville [1] - 1381:30
microscopic [1] - 1295:35	ministerial [1] - 1275:2	moments [1] - 1392:31	nature [5] - 1301:22, 1305:15, 1325:2, 1331:27, 1332:25	Neville's [1] - 1399:32
microscopy [13] - 1290:18, 1290:35, 1298:26, 1298:27, 1309:32, 1309:43, 1320:35, 1349:24, 1362:34, 1362:40, 1363:5, 1381:47, 1384:46	MinterEllison [1] - 1266:12	money [3] - 1356:38, 1358:38	near [1] - 1301:11	new [11] - 1276:6, 1285:11, 1287:26, 1287:34, 1288:42, 1317:12, 1338:3, 1338:8, 1338:15, 1338:18
mid [1] - 1382:29	minute [1] - 1318:14	monitor [1] - 1374:9	necessarily [6] - 1287:33, 1314:5, 1315:6, 1328:1, 1341:24, 1379:41	newly [1] - 1393:2
mid-2020 [1] - 1383:42	minutes [4] - 1342:2, 1342:4, 1373:39, 1373:43	month [3] - 1284:12, 1284:15, 1284:25	necessary [3] - 1312:8, 1335:21, 1348:22	news [1] - 1310:21
mid-July [1] - 1382:29	miss [1] - 1292:33	months [18] - 1273:23, 1283:44, 1285:2, 1286:32, 1289:11, 1289:25, 1289:28, 1292:24, 1292:41, 1295:19, 1297:8, 1335:37, 1365:41, 1370:35, 1373:32, 1381:12, 1394:2	need [27] - 1294:43, 1304:20, 1310:13, 1317:27, 1348:23, 1348:24, 1354:37, 1354:38, 1359:23, 1361:24, 1362:13, 1362:14, 1362:17, 1374:15, 1378:43, 1379:4, 1380:27, 1388:40, 1389:26, 1391:12, 1392:47, 1394:23, 1396:22, 1397:35, 1398:41, 1401:2	next [8] - 1275:42, 1358:27, 1367:18, 1372:33, 1374:13, 1385:2, 1388:12, 1392:17
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	missing [1] - 1274:44	most [4] - 1357:46, 1369:40, 1381:44, 1400:37	needed [6] - 1310:35, 1330:29, 1352:11, 1374:18, 1374:19, 1396:15	nexus [3] - 1375:31, 1375:32
mid-2020 [1] - 1383:42	misspoke [1] - 1352:25	morning [7] - 1266:3, 1270:47, 1320:26, 1347:4, 1367:14, 1399:44, 1400:1	needing [1] - 1396:26	Nicoletti [1] - 1329:41
mid-July [1] - 1382:29	mistake [1] - 1284:21	move [8] - 1325:35, 1334:9, 1336:6, 1352:14, 1362:33, 1366:13, 1372:9, 1376:9	needs [7] - 1284:15, 1315:18, 1348:31, 1357:7, 1379:25, 1380:43, 1388:32	nightmare [1] - 1354:1
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	mistakes [1] - 1361:28	movement [1] - 1336:4	negative [6] - 1283:36, 1291:41, 1294:39, 1341:31, 1355:28, 1355:29	ninety [2] - 1285:46, 1286:1
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	misunderstood [1] - 1322:8	moving [1] - 1379:20	negatively [1] - 1285:17	ninety-six [2] - 1285:46, 1286:1
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	mix [3] - 1317:26, 1377:7, 1377:9	Multiple [1] - 1285:38	nerve [1] - 1349:46	no-one [2] - 1329:19, 1332:5
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	mmm-hmm [1] - 1338:1	murder [6] - 1283:6, 1289:33, 1289:40, 1289:47, 1344:47, 1345:1	nerve-racking [1] - 1349:46	nothing [24] - 1274:2, 1274:40, 1283:41, 1293:9, 1293:19, 1293:23, 1293:25, 1295:45, 1296:3, 1296:10, 1305:3, 1307:28, 1307:30, 1311:4, 1314:9, 1314:10, 1320:26, 1343:9, 1350:29, 1370:35, 1370:40, 1391:5, 1400:13
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	modifications [1] - 1285:28	murderer [1] - 1283:10	net [2] - 1364:16, 1369:33	Nothing [2] - 1400:15, 1400:19
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	modify [2] - 1327:9, 1327:23	must [4] - 1304:15, 1335:5, 1390:26, 1390:27	never [21] - 1278:12, 1280:22, 1297:20, 1307:20, 1315:27, 1315:30, 1317:22, 1327:10, 1335:40, 1336:9, 1341:32, 1341:34, 1342:40, 1342:44, 1343:6, 1344:18, 1360:5, 1394:29, 1395:40, 1396:2, 1396:16	notice [3] - 1281:47,
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	modifying [1] - 1380:39	mysterious [1] - 1390:11		
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	Moeller [41] - 1266:4, 1266:28, 1266:34, 1266:43, 1267:20, 1268:7, 1270:12, 1270:17, 1272:8, 1275:19, 1277:16, 1278:21, 1280:6, 1281:39, 1282:47, 1286:21, 1290:17, 1296:6, 1298:29, 1300:1, 1300:47, 1306:39, 1309:42, 1311:36, 1319:29, 1320:10, 1320:23, 1324:22, 1325:41, 1336:27, 1337:8, 1345:18, 1346:27, 1346:35, 1346:42, 1347:33, 1348:18, 1350:32, 1352:4, 1372:40			
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	MOELLER [2] - 1266:30, 1267:38			
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	Moeller" [1] - 1320:17			
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 1369:31, 1370:15, 1371:32, 1371:33, 1371:34, 1372:5, 1374:36, 1378:27, 1379:4, 1379:41, 1380:33, 1381:18, 1381:33, 1382:6, 1383:21, 1384:35, 1386:17, 1386:38, 1391:32, 1398:1, 1399:45, 1400:24	Moeller's [4] - 1273:40, 1293:5, 1311:24, 1324:46			
might [68] - 1269:27, 1272:37, 1273:8, 1280:11, 1281:6, 1282:28, 1282:34, 1291:4, 1291:13, 1291:46, 1292:38, 1293:30, 1294:1, 1294:43, 1295:23, 1296:25, 1300:13, 1308:2, 1311:25, 1316:32, 1316:38, 1316:42, 1323:46, 1325:30, 1327:32, 1335:41, 1335:45, 1337:2, 1340:8, 1340:13, 1341:31, 1342:10, 1344:2, 1344:9, 1345:46, 1346:29, 1347:38, 1352:38, 1354:38, 1355:18, 1355:37, 1358:7, 1363:38, 1364:38, 13				

1299:23, 1399:9
noticed [7] - 1268:45,
 1283:32, 1291:3,
 1318:12, 1318:15,
 1346:42, 1351:46
noticing [2] - 1352:2,
 1352:7
notified [1] - 1399:7
notoriously [1] -
 1400:23
notwithstanding [1] -
 1331:24
novel [2] - 1315:15,
 1315:22
number [20] - 1266:6,
 1266:13, 1272:37,
 1283:47, 1284:23,
 1289:18, 1291:16,
 1299:11, 1303:39,
 1304:1, 1304:41,
 1322:27, 1324:17,
 1326:5, 1351:32,
 1351:36, 1373:41,
 1377:38, 1394:20,
 1396:19
numbers [4] -
 1280:35, 1340:27,
 1361:37, 1379:6
numerical [2] -
 1281:17, 1322:9
numerous [1] -
 1329:11
Nurthen [1] - 1266:21

O

O'Connor [5] -
 1374:20, 1374:29,
 1374:31, 1376:4,
 1376:5
objection [1] -
 1395:47
objective [3] -
 1336:30, 1336:37,
 1337:9
observation [1] -
 1398:15
observations [9] -
 1321:1, 1321:8,
 1321:20, 1328:36,
 1328:42, 1337:20,
 1337:31, 1352:10,
 1363:1
observed [3] -
 1291:17, 1298:31,
 1336:3
observing [3] -
 1291:4, 1291:6,
 1301:33
obtained [6] -

1276:35, 1277:5,
 1279:45, 1287:42,
 1288:3, 1380:37
obtaining [1] -
 1277:44
obviate [1] - 1293:20
obvious [3] - 1363:42,
 1373:2, 1374:36
obviously [24] -
 1268:18, 1273:24,
 1274:1, 1296:21,
 1298:24, 1299:31,
 1300:5, 1300:12,
 1300:44, 1303:7,
 1304:22, 1305:39,
 1305:44, 1310:17,
 1311:1, 1318:45,
 1335:2, 1341:20,
 1345:43, 1348:23,
 1348:28, 1380:43,
 1394:20, 1395:10
occasion [3] -
 1295:34, 1329:44,
 1345:32
occasions [6] -
 1295:9, 1304:45,
 1308:8, 1344:19,
 1345:29, 1345:40
occur [4] - 1281:5,
 1285:2, 1285:6,
 1343:47
occurred [15] -
 1271:42, 1276:39,
 1283:19, 1283:39,
 1284:28, 1296:13,
 1309:27, 1310:17,
 1319:18, 1334:25,
 1336:3, 1340:1,
 1342:27, 1342:28,
 1351:39
occurrence [2] -
 1356:15, 1356:18
occurring [5] -
 1337:21, 1352:10,
 1352:20, 1356:47,
 1382:23
OCTOBER [3] -
 1267:38, 1351:28,
 1401:9
October [5] - 1265:20,
 1267:4, 1383:2,
 1383:8
odd [3] - 1356:20,
 1356:26, 1356:28
OF [4] - 1265:4,
 1267:38, 1351:28,
 1386:23
offence [1] - 1294:30
offender's [2] -
 1287:10, 1294:32

offered [5] - 1288:2,
 1298:10, 1304:23,
 1304:32, 1331:12
offering [1] - 1370:14
offers [3] - 1392:40,
 1392:41, 1398:13
office [1] - 1373:17
officer [5] - 1380:17,
 1381:31, 1399:37,
 1399:38
officers [2] - 1379:26,
 1379:30
often [5] - 1281:5,
 1300:15, 1326:31,
 1326:33, 1361:7
old [1] - 1379:9
once [3] - 1270:8,
 1289:44, 1368:39
one [77] - 1269:23,
 1272:37, 1279:40,
 1283:29, 1283:32,
 1286:5, 1286:12,
 1287:9, 1287:29,
 1289:22, 1289:42,
 1294:32, 1295:34,
 1297:35, 1304:46,
 1305:32, 1305:33,
 1307:33, 1307:44,
 1309:31, 1311:45,
 1313:5, 1313:8,
 1313:38, 1316:5,
 1318:2, 1319:2,
 1319:42, 1324:1,
 1329:19, 1329:33,
 1331:19, 1332:5,
 1334:18, 1351:47,
 1353:45, 1360:25,
 1360:30, 1360:47,
 1361:21, 1361:31,
 1362:19, 1362:29,
 1365:34, 1368:45,
 1371:22, 1372:40,
 1373:42, 1375:7,
 1375:9, 1375:20,
 1375:24, 1376:2,
 1377:28, 1380:3,
 1382:16, 1383:37,
 1386:37, 1389:40,
 1390:26, 1393:12,
 1394:28, 1395:34,
 1396:35, 1399:9,
 1400:28
one-on-one [4] -
 1362:29, 1375:9,
 1375:20, 1375:24
one-to-one [1] -
 1375:7
ones [9] - 1291:18,
 1300:15, 1300:17,
 1325:9, 1325:11,

1325:12, 1351:36,
 1379:31, 1396:28
ongoing [1] - 1302:19
opening [1] - 1389:15
operating [3] -
 1312:28, 1312:37,
 1312:39
Operation [4] -
 1283:2, 1289:22,
 1337:47, 1343:41
operation [3] - 1283:6,
 1283:18, 1358:3
operations [1] -
 1326:41
operator [4] - 1299:17,
 1355:42, 1362:36,
 1372:14
Operator [2] - 1321:5,
 1391:10
opinion [5] - 1288:9,
 1316:11, 1322:27,
 1337:29, 1348:22
opinions [1] - 1288:2
opportunity [9] -
 1284:10, 1284:13,
 1294:14, 1314:19,
 1326:34, 1327:9,
 1327:22, 1328:24,
 1391:12
opposed [2] -
 1319:42, 1363:38
opted [1] - 1275:32
optimal [3] - 1314:11,
 1314:12, 1319:8
optimally [2] -
 1274:38, 1313:30
optimum [1] - 1369:42
option [4] - 1275:37,
 1278:41, 1278:42,
 1359:1
options [1] - 1356:4
Options [1] - 1371:17
OQI [3] - 1289:25,
 1290:6, 1290:12
OQIs [17] - 1284:13,
 1284:16, 1284:19,
 1284:23, 1284:25,
 1284:28, 1284:46,
 1286:24, 1290:7,
 1296:22, 1296:28,
 1352:31, 1352:33,
 1352:44, 1354:8,
 1354:14, 1354:30
orally [1] - 1351:35
order [6] - 1302:9,
 1325:46, 1329:45,
 1338:38, 1381:21,
 1400:30
ordinarily [1] - 1313:8
organisation [1] -

1340:23
organised [2] -
 1270:41, 1270:44
origin [1] - 1317:2
original [4] - 1301:47,
 1358:28, 1383:13,
 1398:12
ostracised [1] -
 1297:29
OTHERS [1] - 1391:46
otherwise [7] -
 1267:16, 1269:28,
 1332:3, 1347:39,
 1369:31, 1378:47,
 1393:2
ought [3] - 1280:41,
 1341:30, 1379:33
ourselves [6] -
 1300:39, 1300:44,
 1322:35, 1323:32,
 1380:21
outcast [1] - 1299:1
outcome [4] - 1310:8,
 1374:22, 1374:24,
 1374:35
outcomes [2] -
 1329:6, 1371:3
outline [2] - 1302:19,
 1303:10
outlined [2] - 1278:25,
 1287:8
outlines [2] - 1384:21,
 1385:43
outlook [1] - 1324:38
output [1] - 1362:17
outside [3] - 1286:40,
 1322:20, 1346:43
outsource [1] -
 1341:33
outsourced [2] -
 1301:34, 1348:41
overall [1] - 1300:9
overarching [1] -
 1324:11
overheard [1] -
 1339:45
overly [1] - 1350:19
overrode [1] - 1282:35
overtly [2] - 1307:16,
 1307:17
overview [1] - 1318:44
own [5] - 1307:42,
 1337:25, 1337:30,
 1366:46, 1396:10
ownership [5] -
 1281:34, 1283:26,
 1318:7, 1319:13,
 1319:20

pipettes [1] - 1286:1	position [10] - 1297:24, 1297:35, 1297:40, 1297:46, 1298:6, 1298:9, 1313:4, 1338:38, 1372:47, 1379:33	1388:31	1281:14, 1291:3, 1291:4, 1291:46, 1293:8, 1293:20, 1294:30, 1295:2, 1295:8, 1295:13, 1295:45, 1320:44, 1332:29, 1351:45, 1353:35, 1354:40, 1354:41, 1356:46, 1363:36, 1364:7, 1364:8, 1364:9, 1364:10, 1364:11, 1364:22, 1369:24, 1369:36, 1369:44, 1370:13, 1370:32, 1375:32, 1397:3	1379:20, 1384:42, 1386:3, 1395:22, 1396:9, 1398:28
place [9] - 1268:20, 1293:13, 1293:29, 1303:21, 1368:13, 1369:28, 1373:13, 1383:44	positive [1] - 1291:33	premature [1] - 1325:25	processed [12] - 1268:40, 1269:11, 1277:34, 1281:13, 1284:3, 1284:16, 1284:37, 1286:33, 1289:27, 1291:34, 1291:39, 1312:34	
placed [3] - 1267:13, 1298:9, 1305:35	positively [1] - 1285:18	preparation [1] - 1340:41		
placement [2] - 1302:32, 1302:36	possibility [4] - 1312:1, 1313:41, 1321:24, 1342:38	prepare [1] - 1372:4		
places [1] - 1379:11	possible [14] - 1270:33, 1286:28, 1302:41, 1313:34, 1314:41, 1317:7, 1321:23, 1322:28, 1323:10, 1340:15, 1340:19, 1379:7, 1379:11, 1380:38	prepared [6] - 1362:41, 1362:42, 1382:3, 1389:38, 1395:8, 1395:13		
plain [1] - 1328:14		prepares [1] - 1383:24		
plan [2] - 1366:27, 1367:38		preparing [2] - 1352:32, 1383:30		
planting [2] - 1324:10, 1324:15		presence [2] - 1291:45, 1303:21		
plastic [1] - 1357:2		present [5] - 1300:13, 1334:21, 1334:39, 1351:20, 1373:14	problematic [3] - 1281:32, 1331:18, 1338:16	
plates [1] - 1285:32	possibly [17] - 1278:9, 1279:11, 1279:16, 1282:10, 1291:8, 1302:14, 1304:33, 1304:34, 1313:34, 1318:16, 1318:44, 1318:47, 1327:47, 1340:34, 1346:40, 1353:15, 1354:13	presentation [5] - 1301:19, 1375:13, 1376:16, 1376:30, 1376:41	problematical [1] - 1282:3	processing [13] - 1268:9, 1271:27, 1277:30, 1277:37, 1281:25, 1285:25, 1295:4, 1316:15, 1318:5, 1353:6, 1354:5, 1358:18, 1360:27
play [2] - 1317:13, 1332:6	post [3] - 1383:16, 1386:43, 1386:45	presented [11] - 1338:37, 1338:43, 1340:21, 1340:27, 1340:42, 1341:8, 1341:15, 1341:19, 1375:19, 1384:24, 1385:23	problems [3] - 1284:17, 1311:45, 1331:31	produced [6] - 1276:32, 1370:25, 1370:41, 1386:4, 1387:16, 1393:40
plus [1] - 1396:15	potential [3] - 1273:9, 1299:3, 1310:33	presently [2] - 1317:32, 1333:41	procedure [12] - 1274:10, 1312:28, 1312:37, 1312:39, 1313:38, 1317:45, 1348:30, 1364:28, 1364:35, 1365:4, 1365:5, 1399:31	
point [38] - 1280:33, 1288:16, 1297:7, 1297:45, 1298:30, 1303:1, 1314:47, 1316:31, 1329:12, 1329:20, 1335:36, 1336:18, 1341:5, 1344:25, 1353:15, 1353:41, 1360:38, 1363:6, 1363:7, 1363:12, 1363:17, 1364:10, 1364:25, 1378:33, 1379:20, 1382:10, 1389:23, 1390:41, 1391:37, 1393:45, 1394:22, 1394:34, 1394:44, 1395:3, 1395:17, 1398:28, 1398:30, 1398:32	potentially [2] - 1314:15, 1397:27	preservation [1] - 1278:42	process [62] - 1268:14, 1268:20, 1268:27, 1268:32, 1268:36, 1269:1, 1269:10, 1273:17, 1273:29, 1275:33, 1275:35, 1275:36, 1276:15, 1276:26, 1278:1, 1278:41, 1279:16, 1279:44, 1279:46, 1280:14, 1280:36, 1281:8, 1285:11, 1285:27, 1285:28, 1287:32, 1291:26, 1292:28, 1292:31, 1293:19, 1294:25, 1309:25, 1309:35, 1313:21, 1313:29, 1317:40, 1319:14, 1330:7, 1332:20, 1349:35, 1356:23, 1356:47, 1358:7, 1358:22, 1358:27, 1362:43, 1363:20, 1363:27, 1363:28, 1363:39, 1363:41, 1364:12, 1364:14, 1369:41, 1376:44, 1379:9,	producing [1] - 1328:41
pointed [2] - 1310:32, 1369:39	practical [3] - 1276:10, 1324:33, 1369:27	pressing [1] - 1296:37		production [1] - 1381:14
points [3] - 1282:5, 1282:27, 1377:3	practice [3] - 1291:30, 1294:38, 1306:28	pressures [1] - 1392:19		professional [3] - 1391:6, 1391:25, 1395:18
Police [4] - 1279:14, 1311:42, 1371:21, 1378:28	practices [2] - 1303:18, 1372:26	presume [2] - 1326:28, 1334:15		profile [18] - 1276:35, 1276:40, 1277:5, 1277:38, 1280:33, 1291:8, 1313:35, 1314:1, 1314:3, 1316:9, 1316:11, 1318:16, 1360:47, 1361:16, 1371:40, 1371:42, 1371:44, 1380:22
police [8] - 1289:42, 1313:39, 1314:6, 1314:10, 1315:27, 1317:25, 1379:42, 1381:27	praised [3] - 1361:7, 1361:26, 1361:39	presumptive [2] - 1380:16, 1380:22		profiled [2] - 1318:29, 1318:31
poor [3] - 1274:38, 1345:21, 1400:23	pre [1] - 1387:1	pretty [3] - 1310:26, 1344:11, 1374:18		profiles [17] - 1269:2, 1270:6, 1274:39, 1277:44, 1279:45, 1283:32, 1287:42, 1287:43, 1288:3, 1288:9, 1316:13, 1316:16, 1317:14, 1328:41, 1329:7, 1329:14, 1374:8
poorly [2] - 1297:4, 1335:35	pre-August [1] - 1387:1	prevent [1] - 1286:9		profiling [4] - 1280:43,
populating [1] - 1280:27	preceded [2] - 1375:15, 1397:42	previous [5] - 1285:11, 1304:45, 1367:19, 1385:22, 1385:45		
posited [1] - 1358:6	precision [1] - 1325:4	previously [4] - 1323:21, 1336:38, 1336:39, 1365:47		
	preconceived [1] - 1308:38	principles [1] - 1285:29		
	predecessor [1] - 1328:4	prioritising [2] - 1360:23, 1360:24		
	prefer [2] - 1316:33, 1342:8	proactive [2] - 1321:38, 1331:20		
	preference [2] - 1279:42, 1280:7	problem [36] - 1274:19, 1281:7,		
	prejudice [1] - 1282:5			
	preliminary [1] -			

1282:21, 1300:9, 1316:16	proper [4] - 1318:18, 1347:19, 1353:7, 1355:1	Public [1] - 1272:24	qualifications [3] - 1266:38, 1312:4, 1312:6	1330:19, 1336:45, 1343:40, 1347:46, 1348:13, 1348:33, 1349:19, 1373:41, 1373:46, 1373:47, 1376:6, 1378:19, 1381:2, 1381:44, 1386:29, 1398:44
programming [1] - 1317:12	properly [5] - 1275:3, 1294:25, 1310:24, 1391:6, 1391:25	publicly [1] - 1311:19	qualitative [1] - 1281:20	quick [3] - 1349:45, 1349:47, 1361:7
progress [4] - 1269:19, 1359:1, 1388:35, 1394:24	proponent [2] - 1368:16, 1379:21	pull [1] - 1341:12	quality [14] - 1284:10, 1284:13, 1355:40, 1359:7, 1359:16, 1359:20, 1359:28, 1360:2, 1360:7, 1360:10, 1360:24, 1360:40, 1361:28, 1361:34	quicker [1] - 1355:7
progressed [3] - 1272:6, 1294:40, 1369:6	proportions [1] - 1329:19	punished [4] - 1297:30, 1298:21, 1298:25, 1299:2	quant [12] - 1280:40, 1312:14, 1312:33, 1312:44, 1313:6, 1313:12, 1313:17, 1313:29, 1313:40, 1316:14	quickly [2] - 1355:23, 1367:13
Project [30] - 1290:42, 1293:39, 1365:12, 1365:21, 1366:5, 1366:6, 1368:17, 1369:35, 1369:38, 1382:18, 1382:38, 1382:43, 1385:9, 1386:14, 1386:17, 1386:18, 1393:44, 1393:45, 1394:3, 1394:11, 1396:34, 1396:41, 1397:6, 1397:22, 1397:27, 1397:32, 1397:35, 1397:36, 1397:42, 1397:47	proposal [18] - 1308:23, 1366:6, 1366:28, 1366:29, 1366:43, 1369:5, 1370:19, 1382:18, 1382:33, 1382:37, 1382:38, 1383:1, 1383:6, 1383:8, 1383:38, 1384:6, 1385:4, 1385:28	purpose [1] - 1394:9	quantification [2] - 1268:25, 1268:28	quite [44] - 1269:6, 1270:5, 1271:32, 1271:38, 1274:5, 1274:9, 1274:10, 1277:39, 1277:41, 1281:14, 1282:47, 1287:29, 1294:9, 1304:22, 1308:41, 1312:25, 1317:7, 1321:28, 1326:21, 1326:22, 1327:32, 1331:38, 1332:18, 1337:28, 1338:14, 1338:15, 1340:44, 1340:47, 1345:37, 1352:10, 1353:45, 1355:34, 1356:20, 1361:18, 1362:3, 1363:21, 1363:42, 1371:16, 1374:32, 1375:35, 1387:39, 1390:29, 1395:11, 1395:14
PROJECT [1] - 1386:23	PROPOSAL [1] - 1386:23	purposes [1] - 1345:12	quantitation [3] - 1276:23, 1280:10, 1280:36	quote [1] - 1276:47
project [43] - 1290:43, 1290:44, 1297:14, 1315:19, 1317:37, 1336:6, 1336:8, 1336:28, 1336:29, 1336:39, 1366:7, 1366:27, 1366:46, 1367:7, 1367:37, 1368:18, 1368:25, 1368:33, 1369:5, 1369:47, 1370:7, 1370:8, 1370:22, 1382:33, 1382:37, 1383:1, 1383:7, 1383:8, 1383:41, 1383:44, 1383:45, 1384:6, 1384:35, 1385:4, 1385:30, 1386:20, 1394:11, 1394:24, 1396:3, 1396:34, 1396:36, 1397:32, 1398:16	proposal/plan [1] - 1367:7	pursued [2] - 1384:32, 1397:22	quarantining [1] - 1286:10	
projects [1] - 1348:29	proposals [3] - 1385:30, 1386:2, 1386:3	pursuing [2] - 1298:27, 1384:35	quarter [2] - 1311:27, 1361:23	
promulgate [1] - 1368:36	Proposals [1] - 1386:18	put [57] - 1279:27, 1282:3, 1285:23, 1285:33, 1290:4, 1293:29, 1296:21, 1297:17, 1297:45, 1299:23, 1305:43, 1307:44, 1308:40, 1329:9, 1329:10, 1329:12, 1336:44, 1336:47, 1339:7, 1341:23, 1344:3, 1346:36, 1346:40, 1347:33, 1347:34, 1347:37, 1348:1, 1357:15, 1357:20, 1357:25, 1357:29, 1362:17, 1362:20, 1364:13, 1365:19, 1365:28, 1365:38, 1368:13, 1368:16, 1369:28, 1371:41, 1373:24, 1374:2, 1376:32, 1380:24, 1382:17, 1384:36, 1385:3, 1388:13, 1391:7, 1392:18, 1392:44, 1393:5, 1394:19, 1394:36, 1396:21	quarterly [3] - 1361:22, 1361:32, 1361:42	
prone [1] - 1332:27	provide [1] - 1399:12	puts [1] - 1379:32	Quartermain [4] - 1329:34, 1330:33, 1330:36, 1330:40	
pronounce [2] - 1320:19, 1320:22	proposed [4] - 1308:28, 1358:25, 1363:34, 1370:29	putting [7] - 1272:34, 1279:13, 1293:12, 1308:14, 1347:31, 1347:32, 1396:4	QUEENSLAND [1] - 1265:6	
pronounced [1] - 1320:12	proposing [1] - 1370:15		Queensland [15] - 1266:13, 1267:42, 1279:14, 1301:42, 1307:34, 1307:38, 1307:46, 1311:42, 1333:42, 1351:11, 1359:30, 1371:21, 1377:12, 1378:8, 1378:28	
pronunciation [1] - 1320:11	propositions [2] - 1282:3, 1282:4		queries [1] - 1391:32	
	prospect [2] - 1294:45, 1317:25		questioned [3] - 1306:40, 1318:2, 1329:27	
	proved [1] - 1272:38		questioning [1] - 1275:34	
	proven [1] - 1346:14		questions [28] - 1274:30, 1279:22, 1289:47, 1300:47, 1305:32, 1305:34, 1317:38, 1319:47, 1320:4, 1320:38, 1320:41, 1329:3,	
	provide [5] - 1376:31, 1380:40, 1382:11, 1383:28, 1396:39			
	provided [8] - 1351:18, 1371:20, 1387:12, 1387:21, 1387:24, 1387:28, 1388:19, 1388:20			
	providing [2] - 1300:7, 1367:37			
	public [11] - 1271:7, 1271:12, 1272:9, 1272:12, 1272:20, 1272:25, 1272:28, 1272:31, 1272:32, 1272:42, 1273:11			

R

racking [1] - 1349:46

raise [13] - 1275:6,
1277:23, 1290:17,
1294:17, 1297:43,
1299:30, 1299:35,
1309:38, 1309:42,
1310:47, 1311:37,
1389:20, 1391:21

raised [47] - 1267:7,
1271:17, 1271:23,
1271:36, 1277:16,
1277:27, 1278:46,
1279:28, 1279:36,
1282:27, 1284:19,
1284:22, 1284:24,
1284:25, 1284:29,
1284:46, 1285:3,
1286:24, 1286:25,
1289:7, 1289:22,
1289:26, 1290:7,
1291:12, 1292:40,

1293:9, 1293:18, 1296:22, 1299:31, 1307:14, 1308:10, 1311:1, 1315:27, 1319:12, 1321:38, 1334:16, 1335:23, 1352:36, 1354:9, 1361:42, 1362:38, 1365:18, 1365:20, 1365:37, 1366:11, 1376:18	1388:31 readily [3] - 1346:30, 1380:9, 1380:15 reading [1] - 1341:37 reagent [1] - 1357:25 real [2] - 1325:3, 1351:46 realised [4] - 1291:36, 1307:22, 1345:43, 1375:35 really [33] - 1276:5, 1279:11, 1282:19, 1290:12, 1292:12, 1298:29, 1300:4, 1303:42, 1304:31, 1309:46, 1312:9, 1316:19, 1336:2, 1337:5, 1341:26, 1344:30, 1345:37, 1353:6, 1354:2, 1355:14, 1355:23, 1355:38, 1356:25, 1359:19, 1360:6, 1361:19, 1363:26, 1363:30, 1374:34, 1381:14, 1394:10, 1394:12 reaping [1] - 1324:10 rearranged [1] - 1388:33 reason [13] - 1269:25, 1271:3, 1281:4, 1316:37, 1316:41, 1316:43, 1331:46, 1336:45, 1337:34, 1362:15, 1390:1, 1395:47, 1396:2 reasonable [4] - 1273:12, 1328:14, 1350:19, 1383:21 reasonably [1] - 1382:28 reasoning [1] - 1315:45 reasons [15] - 1281:5, 1281:6, 1294:43, 1310:32, 1316:42, 1324:10, 1324:13, 1332:2, 1332:10, 1336:35, 1352:47, 1365:44, 1370:25, 1373:2, 1396:3 reassuring [1] - 1325:22 rebel [1] - 1335:26 rebel-rousing [1] - 1335:26 recalling [1] - 1395:12 received [5] - 1278:13, 1300:20, 1303:13,	1304:29, 1324:8 receives [1] - 1382:33 receiving [2] - 1337:26, 1378:41 recent [8] - 1316:44, 1317:2, 1317:3, 1317:24, 1318:11, 1318:13, 1319:9, 1381:44 recently [3] - 1333:11, 1333:19, 1333:38 recognise [2] - 1345:30, 1392:46 recognition [1] - 1346:1 recollection [14] - 1286:29, 1286:46, 1287:3, 1298:17, 1306:14, 1319:19, 1326:7, 1326:15, 1338:15, 1340:36, 1342:29, 1342:30, 1382:7, 1393:39 recommendation [2] - 1332:42, 1334:5 record [5] - 1266:15, 1267:13, 1303:18, 1306:27, 1372:26 record-keeping [3] - 1303:18, 1306:27, 1372:26 recording [1] - 1305:33 recovered [1] - 1380:44 recovery [9] - 1268:4, 1291:17, 1338:9, 1363:21, 1363:27, 1364:12, 1368:22, 1369:41, 1381:6 red [1] - 1338:19 redacted [2] - 1398:7, 1398:10 redaction [1] - 1396:26 redactions [1] - 1396:31 redundant [2] - 1394:10, 1395:17 Reece [9] - 1265:31, 1266:1, 1266:25, 1267:23, 1272:47, 1282:43, 1318:3, 1346:5, 1348:6 REECE [39] - 1266:3, 1266:27, 1266:32, 1266:34, 1267:19, 1267:25, 1267:30, 1267:41, 1270:47, 1273:2, 1275:19,	1275:27, 1275:42, 1278:21, 1281:23, 1282:45, 1286:19, 1288:22, 1289:7, 1293:5, 1293:33, 1296:6, 1298:15, 1299:42, 1300:1, 1300:42, 1302:38, 1303:47, 1304:29, 1306:7, 1306:39, 1307:32, 1311:24, 1346:29, 1348:9, 1348:11, 1348:13, 1350:29, 1350:41 REEVES [1] - 1368:8 Reeves [30] - 1290:25, 1292:5, 1293:34, 1293:36, 1297:34, 1306:16, 1307:6, 1307:9, 1321:9, 1332:44, 1333:11, 1333:19, 1333:24, 1333:38, 1336:4, 1336:6, 1336:28, 1337:21, 1337:24, 1337:28, 1337:33, 1337:40, 1347:25, 1362:39, 1366:38, 1367:28, 1368:3, 1370:14, 1382:23 Reeves' [1] - 1310:34 refer [6] - 1269:47, 1281:40, 1300:27, 1301:24, 1308:14, 1399:1 reference [9] - 1267:30, 1281:9, 1281:12, 1300:42, 1333:37, 1334:44, 1346:30, 1352:31, 1358:10 references [1] - 1267:9 referentially [1] - 1322:34 referred [3] - 1300:36, 1336:27, 1339:28 referring [6] - 1305:11, 1309:31, 1316:4, 1357:6, 1358:41, 1397:15 refers [1] - 1290:6 reflect [1] - 1340:28 reflecting [1] - 1316:32 reflection [3] - 1270:25, 1341:15, 1341:23 reflective [2] - 1324:28, 1324:30	refresh [2] - 1333:36, 1383:20 refreshed [1] - 1393:37 refreshes [1] - 1270:2 regard [9] - 1281:26, 1300:23, 1317:43, 1323:26, 1383:19, 1393:43, 1395:5, 1399:13, 1399:14 regarded [4] - 1294:39, 1335:2, 1375:6, 1391:5 regarding [4] - 1302:8, 1302:24, 1302:39, 1399:31 regards [1] - 1302:31 regime [1] - 1387:1 register [6] - 1313:44, 1314:9, 1361:14, 1380:9, 1380:13, 1380:39 registered [2] - 1314:2, 1314:4 regrettably [1] - 1345:46 rehabilitated [1] - 1328:8 rejected [1] - 1295:41 relate [1] - 1322:6 related [2] - 1283:6, 1350:5 relates [2] - 1272:33, 1362:33 relating [4] - 1303:17, 1306:27, 1372:10, 1372:25 relation [10] - 1277:3, 1288:2, 1303:29, 1308:34, 1330:46, 1331:33, 1331:42, 1348:2, 1352:37, 1376:15 relations [1] - 1343:16 relationship [5] - 1271:30, 1271:33, 1313:21, 1337:13, 1375:44 release [2] - 1285:24 released [1] - 1396:40 relevance [1] - 1380:33 relevant [8] - 1312:6, 1318:46, 1363:31, 1369:13, 1371:32, 1379:22, 1381:31, 1382:1 relied [1] - 1337:24 relieve [1] - 1381:21 relieved [1] - 1336:32
--	--	--	---	--

rely ^[1] - 1334:42
remain ^[1] - 1350:34
remained ^[1] - 1359:2
remains ^[1] - 1345:32
remember ^[38] -
 1270:36, 1302:17,
 1303:8, 1349:12,
 1351:43, 1352:36,
 1352:47, 1353:17,
 1353:41, 1353:44,
 1353:45, 1354:11,
 1354:14, 1354:15,
 1354:17, 1354:32,
 1355:12, 1355:13,
 1355:17, 1355:19,
 1359:5, 1361:41,
 1362:3, 1363:44,
 1365:11, 1366:7,
 1366:8, 1366:9,
 1366:19, 1367:33,
 1367:34, 1369:10,
 1371:25, 1371:26,
 1372:2, 1374:5,
 1390:2, 1397:7
remembered ^[1] -
 1389:39
remembering ^[1] -
 1371:37
reminding ^[1] -
 1288:40
remove ^[3] - 1285:14,
 1285:19, 1285:20
removed ^[5] -
 1285:23, 1297:20,
 1298:5, 1305:45,
 1336:40
repeat ^[2] - 1294:21,
 1338:33
repeated ^[5] -
 1296:14, 1342:25,
 1342:40, 1342:44
repeatedly ^[2] -
 1324:28, 1347:17
replied ^[1] - 1331:41
reply ^[1] - 1398:6
replying ^[1] - 1377:33
REPORT ^[2] -
 1392:12, 1393:31
report ^[45] - 1290:7,
 1290:12, 1369:37,
 1369:38, 1370:40,
 1371:10, 1382:2,
 1382:11, 1383:42,
 1386:4, 1386:30,
 1386:37, 1387:5,
 1387:17, 1387:28,
 1388:4, 1389:2,
 1389:8, 1389:15,
 1389:20, 1389:26,
 1389:34, 1389:37,
 1389:43, 1389:46,
 1390:10, 1390:14,
 1392:2, 1392:9,
 1393:15, 1393:23,
 1394:23, 1394:44,
 1394:45, 1395:16,
 1395:21, 1395:23,
 1395:29, 1395:34,
 1395:43, 1396:1,
 1396:14, 1396:40,
 1397:39, 1399:3
report_draft1 ^[1] -
 1392:29
reported ^[4] - 1287:15,
 1292:45, 1293:39,
 1321:7
reporter ^[15] - 1268:3,
 1280:9, 1287:26,
 1287:34, 1288:42,
 1288:43, 1289:5,
 1289:40, 1300:8,
 1324:40, 1324:46,
 1338:11, 1338:13,
 1338:20
reporter's ^[1] -
 1313:47
reporters ^[5] - 1322:1,
 1322:3, 1324:37,
 1325:8, 1375:30
reporters' ^[1] -
 1386:38
reporting ^[57] -
 1267:46, 1269:19,
 1269:29, 1280:19,
 1280:22, 1280:27,
 1280:34, 1280:42,
 1281:30, 1283:30,
 1292:4, 1292:5,
 1297:35, 1297:36,
 1298:6, 1300:3,
 1300:23, 1300:43,
 1316:26, 1321:47,
 1322:10, 1322:11,
 1324:2, 1329:46,
 1332:34, 1338:4,
 1338:8, 1338:23,
 1338:28, 1338:30,
 1338:37, 1338:39,
 1338:41, 1338:45,
 1339:9, 1339:14,
 1339:15, 1339:20,
 1348:27, 1351:10,
 1353:9, 1353:13,
 1353:22, 1354:23,
 1355:33, 1359:18,
 1362:14, 1362:38,
 1366:46, 1367:23,
 1368:32, 1372:3,
 1375:13, 1376:42,
 1377:7
reports ^[1] - 1385:17
represent ^[1] - 1300:4
representative ^[4] -
 1304:8, 1304:12,
 1304:16, 1306:32
represented ^[3] -
 1338:29, 1338:43,
 1376:45
reprisal ^[2] - 1302:9,
 1302:39
reprocess ^[1] -
 1358:31
request ^[1] - 1288:28
requested ^[2] -
 1270:7, 1303:16
require ^[1] - 1266:15
required ^[5] - 1272:29,
 1334:40, 1355:3,
 1373:1, 1395:39
resistance ^[1] -
 1363:18
resolution ^[1] - 1376:6
resolve ^[2] - 1294:9,
 1316:19
resolved ^[6] -
 1289:11, 1348:22,
 1363:9, 1364:9,
 1365:10, 1365:17
resource ^[1] - 1337:43
resources ^[4] -
 1337:41, 1378:44,
 1379:3, 1381:23
respect ^[7] - 1302:31,
 1325:1, 1328:37,
 1382:7, 1383:45,
 1394:7, 1397:22
respond ^[5] - 1294:27,
 1309:26, 1310:21,
 1325:47, 1398:21
responded ^[3] -
 1275:6, 1275:21,
 1303:4
responding ^[3] -
 1294:22, 1391:13,
 1396:32
response ^[23] -
 1271:36, 1274:23,
 1277:8, 1278:13,
 1278:14, 1278:15,
 1279:26, 1282:6,
 1282:7, 1291:38,
 1308:23, 1308:34,
 1310:14, 1310:20,
 1310:22, 1335:4,
 1345:41, 1347:8,
 1355:8, 1370:19,
 1389:5, 1396:29,
 1398:11
responsibilities ^[3] -
 1336:7, 1336:22,
 1336:33
responsibility ^[1] -
 1340:47
rest ^[3] - 1325:4,
 1334:37, 1356:8
restricted ^[2] -
 1322:19, 1323:47
result ^[23] - 1278:2,
 1278:3, 1279:12,
 1279:15, 1279:18,
 1283:39, 1284:28,
 1284:45, 1288:22,
 1291:39, 1300:9,
 1301:37, 1310:7,
 1314:2, 1314:11,
 1314:12, 1355:38,
 1359:21, 1371:39,
 1383:41, 1383:46,
 1386:4
resulted ^[1] - 1277:38
results ^[15] - 1276:19,
 1279:13, 1286:22,
 1287:15, 1287:22,
 1308:3, 1329:12,
 1354:18, 1355:31,
 1355:36, 1371:38,
 1381:14, 1383:29,
 1384:23, 1385:21
resume ^[1] - 1350:34
retain ^[1] - 1336:22
retained ^[1] - 1380:7
retested ^[1] - 1314:20
retribution ^[5] -
 1337:1, 1337:10,
 1337:26, 1337:36,
 1347:24
retrospective ^[1] -
 1293:47
retrospectively ^[6] -
 1284:45, 1286:28,
 1289:30, 1289:31,
 1293:15, 1293:26
return ^[2] - 1343:41,
 1398:5
returned ^[1] - 1273:39
returning ^[1] - 1269:2
reveal ^[1] - 1386:33
revealed ^[1] - 1370:13
review ^[8] - 1293:47,
 1360:47, 1361:22,
 1361:32, 1361:42,
 1362:30, 1372:4,
 1383:16
reviewed ^[1] - 1296:37
reviews ^[1] - 1361:17
rework ^[2] - 1313:44,
 1313:45
Rhys ^[3] - 1305:24,
 1323:4, 1367:5
Rice ^[1] - 1315:34
RICE ^[4] - 1315:36,
 1315:38, 1319:27,
 1400:13
rightfully ^[1] - 1279:14
Rika ^[55] - 1269:7,
 1269:31, 1272:2,
 1283:37, 1290:28,
 1292:5, 1293:36,
 1297:36, 1305:20,
 1307:4, 1308:1,
 1308:14, 1321:9,
 1323:12, 1331:8,
 1331:12, 1331:16,
 1331:17, 1331:19,
 1331:27, 1331:29,
 1332:2, 1332:9,
 1332:27, 1332:34,
 1334:31, 1346:43,
 1346:47, 1347:3,
 1347:22, 1349:20,
 1351:1, 1351:7,
 1351:31, 1356:46,
 1368:4, 1372:47,
 1377:19, 1377:22,
 1378:25, 1381:43,
 1390:42, 1391:41,
 1392:18, 1394:29,
 1394:37, 1394:43,
 1395:5, 1395:32,
 1396:24, 1398:24,
 1399:40, 1399:46,
 1400:37, 1400:46
RIKA ^[5] - 1351:3,
 1351:28, 1368:8,
 1377:24, 1391:46
Rika's ^[4] - 1297:34,
 1398:27, 1400:4,
 1400:33
ring ^[2] - 1382:34,
 1383:47
risk ^[3] - 1287:8,
 1287:14, 1371:28
robot ^[1] - 1351:41
role ^[4] - 1268:3,
 1293:34, 1359:19,
 1398:1
room ^[12] - 1297:16,
 1297:17, 1298:45,
 1298:47, 1336:4,
 1336:6, 1336:31,
 1336:38, 1346:43,
 1350:34, 1353:11,
 1359:2
root ^[2] - 1294:4,
 1364:22
roughly ^[1] - 1272:3
round ^[2] - 1380:20,
 1395:2
roundtable ^[3] -
 1353:34, 1355:20,

1356:22	samples ^[126] -	1389:21, 1396:43	1359:33, 1359:42,	1389:1, 1389:34,
rousing ^[1] - 1335:26	1268:9, 1268:24,	sampling ^[3] - 1329:6,	1360:18, 1362:24,	1391:17, 1394:1,
routine ^[2] - 1291:30,	1268:36, 1268:47,	1378:31, 1399:31	1362:28, 1368:21	1394:42
1292:26	1269:2, 1269:10,	sat ^[3] - 1366:8,	scientists ^[49] -	secondly ^[1] - 1369:4
RT1 ^[5] - 1322:28,	1269:13, 1269:18,	1366:29, 1379:18	1266:6, 1266:13,	section ^[14] - 1267:33,
1322:43, 1322:45,	1269:21, 1269:24,	satisfactory ^[1] -	1269:19, 1269:29,	1268:4, 1269:22,
1322:47	1269:28, 1269:29,	1332:3	1274:37, 1278:27,	1269:24, 1310:4,
RT2 ^[11] - 1322:4,	1269:37, 1270:6,	satisfied ^[1] - 1363:16	1279:21, 1280:19,	1338:10, 1368:22,
1322:13, 1322:19,	1271:27, 1273:47,	saved ^[1] - 1381:22	1280:23, 1281:29,	1368:28, 1378:26,
1322:20, 1322:28,	1274:3, 1274:6,	saving ^[1] - 1360:31	1281:30, 1281:33,	1384:19, 1385:16,
1322:43, 1323:6,	1274:10, 1274:38,	saw ^[16] - 1280:22,	1282:11, 1282:22,	1385:40, 1398:9
1323:13, 1323:19,	1276:10, 1276:14,	1283:43, 1296:31,	1282:24, 1291:3,	secured ^[2] - 1285:21,
1323:20, 1323:36	1276:23, 1276:25,	1298:42, 1298:47,	1292:3, 1293:2,	1285:22
rude ^[1] - 1375:36	1277:28, 1278:34,	1299:6, 1299:28,	1294:10, 1294:12,	securing ^[1] - 1285:13
rule ^[1] - 1280:7	1278:36, 1278:37,	1306:35, 1318:6,	1294:26, 1296:9,	see ^[81] - 1266:44,
run ^[1] - 1290:43	1279:8, 1279:43,	1327:1, 1336:6,	1298:10, 1300:4,	1267:35, 1269:13,
running ^[1] - 1392:20	1280:16, 1280:17,	1341:38, 1395:23,	1300:23, 1316:7,	1269:18, 1269:28,
Ryan ^[12] - 1266:21,	1280:20, 1280:22,	1395:34, 1395:44,	1316:26, 1316:33,	1269:29, 1270:17,
1332:15, 1387:29,	1280:25, 1280:26,	1396:1	1317:32, 1317:39,	1274:40, 1275:25,
1387:43, 1388:19,	1280:28, 1280:32,	scared ^[2] - 1270:39,	1320:43, 1321:7,	1280:46, 1281:9,
1390:44, 1392:25,	1281:25, 1281:29,	1325:42	1324:36, 1329:46,	1281:32, 1282:23,
1392:36, 1393:5,	1281:31, 1281:35,	scene ^[2] - 1379:31,	1339:29, 1348:28,	1293:29, 1294:16,
1393:26, 1393:28,	1283:24, 1283:32,	1379:32	1353:10, 1353:13,	1294:33, 1294:34,
1396:15	1283:43, 1283:47,	scenes ^[3] - 1380:17,	1355:32, 1360:46,	1294:35, 1294:38,
RYAN ^[1] - 1393:31	1284:3, 1284:16,	1381:30, 1399:37	1361:18, 1361:46,	1295:46, 1300:8,
	1284:30, 1284:32,	Science ^[1] - 1266:39	1362:38, 1367:13,	1300:11, 1300:12,
	1284:34, 1284:36,	science ^[1] - 1266:40	1378:32, 1378:41,	1300:13, 1300:14,
	1284:37, 1284:40,	Scientific ^[3] -	1379:5, 1379:46,	1300:16, 1301:47,
	1284:44, 1285:38,	1266:14, 1267:42,	1380:40	1303:45, 1309:46,
safe ^[1] - 1311:13	1286:29, 1286:36,	1351:11	scientists' ^[1] -	1315:23, 1317:15,
safety ^[3] - 1272:43,	1287:9, 1287:13,	scientific ^[21] -	1294:22	1318:24, 1318:47,
1364:16, 1369:33	1289:27, 1289:31,	1282:18, 1299:22,	scope ^[1] - 1287:34	1330:24, 1335:10,
sake ^[2] - 1343:43,	1289:42, 1291:7,	1299:24, 1299:30,	scot ^[1] - 1270:34	1336:15, 1346:33,
1344:11	1291:16, 1291:34,	1309:27, 1311:47,	Scott ^[1] - 1266:20	1348:19, 1352:22,
saliva ^[1] - 1365:1	1291:42, 1292:27,	1313:28, 1332:2,	screen ^[14] - 1266:42,	1355:29, 1360:41,
sample ^[45] - 1277:3,	1292:34, 1292:38,	1332:4, 1337:36,	1270:13, 1281:40,	1363:2, 1363:22,
1277:31, 1278:4,	1293:24, 1293:47,	1347:17, 1347:19,	1351:20, 1366:25,	1363:28, 1363:42,
1278:42, 1279:11,	1294:41, 1295:22,	1348:21, 1351:32,	1366:36, 1370:45,	1365:44, 1366:37,
1279:16, 1280:12,	1295:40, 1295:46,	1363:7, 1363:12,	1376:32, 1382:42,	1371:2, 1371:33,
1280:39, 1281:14,	1312:14, 1312:21,	1379:26, 1379:30,	1385:3, 1392:18,	1371:39, 1372:33,
1286:11, 1286:13,	1312:34, 1312:45,	1380:16, 1389:23,	1392:44, 1394:19,	1372:35, 1373:26,
1286:44, 1291:10,	1313:6, 1313:12,	1399:38	1396:29	1374:17, 1376:33,
1291:32, 1294:31,	1313:17, 1313:23,	scientifically ^[4] -	screening ^[2] -	1380:18, 1382:43,
1294:39, 1313:29,	1313:25, 1313:36,	1274:7, 1331:45,	1380:21, 1380:22	1382:46, 1383:12,
1313:31, 1313:33,	1313:42, 1313:45,	1355:25, 1370:1	scroll ^[9] - 1321:4,	1384:4, 1384:19,
1313:40, 1314:15,	1314:4, 1314:5,	scientist ^[34] -	1355:42, 1367:17,	1385:17, 1385:31,
1314:20, 1315:29,	1318:5, 1318:21,	1267:46, 1269:26,	1367:18, 1387:38,	1385:34, 1387:42,
1317:19, 1317:26,	1318:28, 1318:43,	1280:9, 1280:34,	1387:46, 1388:46,	1387:46, 1388:3,
1318:12, 1318:19,	1318:45, 1319:1,	1280:42, 1282:17,	1396:23, 1398:5	1388:27, 1388:43,
1318:27, 1319:3,	1319:35, 1328:37,	1283:31, 1293:2,	se ^[1] - 1390:14	1389:5, 1389:30,
1319:30, 1319:38,	1329:2, 1329:4,	1296:16, 1302:20,	seal ^[1] - 1285:33	1389:41, 1391:20,
1357:7, 1358:14,	1329:5, 1329:14,	1314:41, 1315:28,	second ^[22] - 1278:26,	1392:22, 1392:28,
1359:21, 1359:24,	1329:18, 1332:22,	1318:7, 1323:13,	1291:29, 1293:28,	1393:11, 1396:27,
1359:28, 1360:7,	1332:46, 1348:15,	1338:8, 1338:30,	1294:44, 1316:11,	1396:30, 1397:7,
1364:1, 1364:29,	1354:1, 1354:13,	1338:39, 1338:45,	1351:20, 1365:22,	1397:13, 1398:18
1371:19, 1371:29,	1354:19, 1355:26,	1351:10, 1354:22,	1365:24, 1367:17,	seeing ^[22] - 1268:47,
1371:32, 1380:34	1358:26, 1361:17,	1355:34, 1355:35,	1368:3, 1372:38,	1270:5, 1279:44,
sample-by-sample ^[1]	1364:41, 1364:45,	1356:22, 1359:11,	1382:45, 1387:28,	1280:3, 1286:22,
- 1280:39	1365:6, 1381:7,	1359:18, 1359:19,	1387:38, 1387:46,	1294:15, 1296:23,
sampled ^[2] -	1384:38, 1386:42,	1359:22, 1359:25,	1388:27, 1388:28,	1299:34, 1318:30,
1378:43, 1379:33	1386:44, 1386:47,			

1319:3, 1354:36,
1355:21, 1355:27,
1355:30, 1363:22,
1363:40, 1371:28,
1371:32, 1371:34,
1389:22
seek [4] - 1266:5,
1266:12, 1302:9,
1389:27
seem [2] - 1326:47,
1340:27
selection [2] - 1329:9,
1329:10
self [2] - 1322:34,
1345:30
self-deprecating [1] -
1345:30
self-referentially [1] -
1322:34
semen [2] - 1291:34,
1369:17
seminal [1] - 1291:41
send [2] - 1274:3,
1275:32
sending [2] - 1378:2,
1390:42
senior [8] - 1273:7,
1323:13, 1351:10,
1354:22, 1359:33,
1368:21, 1372:3,
1377:11
sense [14] - 1274:7,
1281:28, 1292:32,
1309:43, 1313:28,
1316:17, 1339:19,
1345:36, 1355:31,
1374:36, 1380:14,
1383:34, 1394:10,
1395:16
sensitivity [3] -
1363:34, 1369:15,
1384:46
sent [27] - 1279:22,
1282:8, 1295:3,
1301:37, 1303:38,
1304:25, 1306:25,
1307:37, 1309:16,
1330:7, 1332:7,
1366:33, 1372:15,
1372:40, 1376:28,
1377:11, 1377:28,
1379:43, 1382:17,
1387:5, 1388:23,
1391:4, 1391:17,
1392:25, 1393:3,
1393:4, 1396:33
sentence [4] -
1299:18, 1359:5,
1361:5, 1363:11
separate [5] - 1324:1,
1358:2, 1392:6,
1392:8, 1396:10
separated [1] - 1358:2
September [2] -
1383:15, 1383:31
sequence [1] -
1338:13
serious [2] - 1270:9,
1271:39
seriously [1] -
1355:23
seriousness [1] -
1271:15
Service [3] - 1279:14,
1311:42, 1378:28
Services [4] -
1266:14, 1267:42,
1301:41, 1351:11
session [2] - 1305:33,
1328:7
set [7] - 1355:43,
1363:1, 1371:30,
1387:34, 1389:21,
1396:43, 1399:47
setting [2] - 1362:29,
1362:30
several [4] - 1275:23,
1275:27, 1292:41,
1300:29
sexual [6] - 1281:8,
1289:43, 1289:46,
1291:5, 1294:30,
1332:46
shaky [1] - 1291:13
shall [1] - 1386:10
share [3] - 1324:38,
1324:41, 1333:32
shared [1] - 1350:9
shares [2] - 1324:40,
1324:46
sharing [1] - 1346:1
Sharon [1] - 1266:22
sheet [4] - 1384:5,
1384:6, 1385:5,
1385:31
shift [1] - 1280:41
shirt [1] - 1380:31
shocked [1] - 1271:38
shocking [4] -
1304:33, 1334:13,
1335:3, 1335:5
shoe [1] - 1371:33
short [1] - 1390:41
shortly [2] - 1359:10,
1368:12
show [7] - 1291:26,
1349:44, 1360:35,
1363:38, 1369:12,
1386:33, 1390:36
showed [4] - 1291:39,
1295:37, 1314:10,
1350:10
showing [1] - 1291:22
shown [4] - 1266:42,
1270:11, 1270:21,
1349:42
shows [1] - 1392:31
sic [1] - 1352:19
sick [1] - 1273:41
side [1] - 1335:44
sieve [3] - 1357:16,
1357:19, 1357:40
sight [1] - 1280:29
sign [5] - 1272:17,
1272:18, 1383:38,
1384:11, 1385:8
sign-off [2] - 1384:11,
1385:8
signal [1] - 1400:36
signature [1] - 1383:1
signatures [1] -
1382:47
signed [4] - 1338:12,
1382:37, 1383:9,
1385:35
significance [9] -
1273:9, 1283:15,
1287:45, 1288:1,
1318:14, 1318:29,
1335:7, 1342:27,
1380:3
significant [8] -
1283:34, 1294:22,
1299:21, 1329:17,
1345:1, 1371:34,
1395:38, 1398:17
silica [4] - 1285:15,
1285:16, 1285:17
similar [5] - 1272:2,
1315:39, 1371:15,
1371:16, 1385:40
similarly [1] - 1274:8
simply [3] - 1269:18,
1313:12, 1336:44
single [2] - 1371:29,
1393:9
singular [1] - 1373:36
sit [7] - 1285:45,
1297:7, 1297:16,
1335:36, 1353:18,
1353:33, 1355:19
sits [3] - 1332:27,
1357:9, 1357:15
sitting [4] - 1298:45,
1346:43, 1353:11,
1353:25
situation [1] -
1268:19, 1275:34,
1294:21, 1297:43,
1300:8, 1310:34,
1318:33, 1327:25,
1337:42, 1349:46,
1379:8
situations [1] -
1315:43
six [5] - 1285:2,
1285:46, 1286:1,
1306:2, 1365:41
slammed [1] - 1334:17
slide [17] - 1291:29,
1291:45, 1294:33,
1363:20, 1363:27,
1363:39, 1363:41,
1364:2, 1364:3,
1364:12, 1364:14,
1364:28, 1364:35,
1365:5, 1369:41
slide-making [8] -
1363:20, 1363:27,
1363:39, 1364:12,
1364:14, 1364:28,
1364:35, 1369:41
slides [10] - 1291:5,
1291:18, 1291:20,
1291:25, 1291:26,
1292:25, 1297:43,
1362:40, 1363:22,
1364:44
slight [1] - 1343:3
slightly [1] - 1344:2
slights [1] - 1347:24
small [7] - 1297:18,
1298:45, 1318:41,
1319:2, 1319:4,
1347:9, 1389:21
smaller [1] - 1318:46
Sofronoff [1] -
1265:26
solution [3] - 1285:13,
1356:3, 1369:27
solutions [1] -
1285:21
solved [2] - 1292:31,
1370:32
someone [2] -
1273:7, 1296:22,
1298:30, 1298:34,
1305:37, 1305:44,
1310:23, 1311:7,
1316:44, 1323:28,
1323:30, 1334:47,
1335:25, 1343:26,
1349:44, 1349:46,
1350:18, 1353:30,
1372:47, 1373:6,
1380:15
sometime [1] - 1311:7
sometimes [7] -
1300:10, 1316:13,
1357:11, 1362:16,
1375:8, 1379:43,
1381:12
somewhat [1] -
1344:9
somewhere [6] -
1271:28, 1286:10,
1315:12, 1336:38,
1373:38, 1396:44
soon [1] - 1321:33
sooner [2] - 1279:15,
1355:2
SOP [7] - 1312:39,
1312:41, 1312:44,
1313:5, 1313:11,
1314:36, 1317:31
sorry [37] - 1267:22,
1270:28, 1275:16,
1277:8, 1278:28,
1278:46, 1280:21,
1306:25, 1320:15,
1321:21, 1322:47,
1326:26, 1328:29,
1335:15, 1337:17,
1338:32, 1339:5,
1339:16, 1339:19,
1341:10, 1342:44,
1352:25, 1362:3,
1364:33, 1365:2,
1365:11, 1365:32,
1366:19, 1377:20,
1377:37, 1381:46,
1389:12, 1396:26,
1397:7, 1397:10,
1398:7, 1398:9
sort [26] - 1275:28,
1293:47, 1294:17,
1304:35, 1314:1,
1314:44, 1314:45,
1315:2, 1318:16,
1318:17, 1337:35,
1350:16, 1353:3,
1353:33, 1355:32,
1355:40, 1361:22,
1363:19, 1363:33,
1365:41, 1366:3,
1368:42, 1375:40,
1380:30, 1400:41
sorts [1] - 1384:38
sought [1] - 1387:20
sound [1] - 1396:4
sounded [1] - 1304:22
sounds [2] - 1350:18,
1394:37
source [4] - 1332:19,
1335:18, 1354:41,
1371:42
sowing [3] - 1324:15,
1347:15, 1347:35
sown [1] - 1347:11
space [1] - 1373:17

speaking [7] - 1279:41, 1299:38, 1311:19, 1313:26, 1315:39, 1327:22, 1388:12

specific [11] - 1271:17, 1272:40, 1272:42, 1282:3, 1333:9, 1333:13, 1337:43, 1339:44, 1354:14, 1354:32, 1369:43

specifically [16] - 1279:36, 1288:47, 1289:45, 1290:44, 1304:32, 1307:9, 1307:20, 1307:42, 1321:36, 1322:6, 1323:8, 1328:2, 1329:33, 1330:19, 1333:16, 1337:37

specifics [1] - 1335:47

spend [2] - 1330:23, 1330:26

spends [1] - 1330:11

spent [3] - 1306:4, 1329:45, 1363:37

sperm [49] - 1290:18, 1290:35, 1291:4, 1291:6, 1291:10, 1291:11, 1291:22, 1291:26, 1291:39, 1291:45, 1294:32, 1294:34, 1294:45, 1295:4, 1295:5, 1295:9, 1295:23, 1295:24, 1295:35, 1295:37, 1295:41, 1295:42, 1298:26, 1298:27, 1309:31, 1309:43, 1320:35, 1349:24, 1362:34, 1363:4, 1363:22, 1363:41, 1363:42, 1364:29, 1364:41, 1365:5, 1369:16, 1370:37, 1371:19, 1371:28, 1371:31, 1371:32, 1371:33, 1371:35, 1371:39, 1371:43, 1371:45, 1371:46, 1381:47

SPERMATOZOA [1] - 1392:12

spermatozoa [4] - 1281:10, 1281:12, 1384:38, 1392:9

spin [7] - 1357:5, 1357:8, 1357:10, 1357:11, 1358:10, 1358:26

spins [1] - 1357:32

spoken [10] - 1296:44, 1310:39, 1322:45, 1333:11, 1333:19, 1334:24, 1335:40, 1361:35, 1382:22, 1399:8

spreadsheet [8] - 1269:35, 1269:37, 1269:38, 1329:3, 1329:4, 1329:5, 1329:8, 1388:39

spun [3] - 1357:9, 1357:12, 1357:37

square [2] - 1285:45, 1286:1

staff [48] - 1269:23, 1297:33, 1299:20, 1299:22, 1299:23, 1301:14, 1301:15, 1301:16, 1301:28, 1301:32, 1302:5, 1308:28, 1308:45, 1310:43, 1326:24, 1326:46, 1332:14, 1332:21, 1340:24, 1340:26, 1340:45, 1340:47, 1341:8, 1341:19, 1341:29, 1341:35, 1344:21, 1351:47, 1352:1, 1361:7, 1361:15, 1361:25, 1361:26, 1361:35, 1362:15, 1367:23, 1367:30, 1375:33, 1376:18, 1376:22, 1376:29, 1376:42, 1397:32

stage [17] - 1269:20, 1281:30, 1285:37, 1291:29, 1300:12, 1354:16, 1354:46, 1362:41, 1363:21, 1363:24, 1364:12, 1364:15, 1380:45, 1387:27, 1387:33, 1393:44, 1396:35

stains [1] - 1380:21

stand [1] - 1374:9

standard [4] - 1312:28, 1312:37, 1312:39, 1314:45

start [11] - 1320:29, 1348:29, 1352:9, 1352:11, 1354:38, 1354:39, 1356:31, 1361:45, 1368:44, 1400:33

started [6] - 1338:23, 1350:16, 1352:2, 1355:1, 1355:2, 1366:5

starters [1] - 1346:39

starts [4] - 1304:3, 1362:35, 1381:45, 1381:46

state [2] - 1389:35, 1396:16

statement [84] - 1266:44, 1267:3, 1267:8, 1267:16, 1267:19, 1268:7, 1268:18, 1268:21, 1268:45, 1269:20, 1269:26, 1270:2, 1273:32, 1273:41, 1276:22, 1279:23, 1280:47, 1281:40, 1281:42, 1281:43, 1283:2, 1283:43, 1287:8, 1287:14, 1288:27, 1289:37, 1290:8, 1290:17, 1293:5, 1300:2, 1300:7, 1300:10, 1300:11, 1301:45, 1306:7, 1307:27, 1307:32, 1309:26, 1310:3, 1310:38, 1311:11, 1315:40, 1320:30, 1328:10, 1328:21, 1328:36, 1329:23, 1330:44, 1332:13, 1333:32, 1337:46, 1339:25, 1343:42, 1346:36, 1346:38, 1349:43, 1350:2, 1350:10, 1351:21, 1351:24, 1351:31, 1352:32, 1356:34, 1360:35, 1360:38, 1363:2, 1363:15, 1370:44, 1372:20, 1372:34, 1373:12, 1376:10, 1376:31, 1378:25, 1381:45, 1386:36, 1387:32, 1389:38, 1389:45, 1390:7, 1395:6, 1395:8, 1395:13, 1399:32

STATEMENT [2] - 1267:38, 1351:28

statements [4] - 1276:47, 1349:39, 1351:18, 1391:22

statistical [2] - 1317:11, 1329:19

statistically [1] - 1329:17

statute [1] - 1272:21

step [19] - 1272:20, 1272:24, 1274:44, 1275:3, 1277:29, 1277:45, 1280:3, 1294:32, 1294:44, 1295:2, 1295:3, 1295:36, 1310:31, 1311:19, 1327:38, 1341:33, 1367:28, 1394:28

steps [5] - 1269:1, 1272:29, 1286:9, 1374:13, 1394:7

still [24] - 1271:26, 1285:21, 1285:28, 1294:24, 1297:24, 1297:26, 1305:9, 1314:21, 1318:25, 1319:20, 1321:37, 1338:3, 1343:18, 1357:12, 1358:7, 1366:12, 1369:42, 1369:43, 1371:20, 1371:40, 1379:41, 1380:23, 1389:21, 1395:27

sting [1] - 1305:1

stood [1] - 1395:24

stop [4] - 1344:23, 1353:6, 1375:38, 1386:8

stopped [4] - 1288:35, 1329:11, 1354:5, 1395:16

story [1] - 1290:12

straight [3] - 1278:6, 1363:36, 1364:14

straightaway [1] - 1291:20

strange [1] - 1306:5

strategic [1] - 1318:4

strategies [3] - 1308:40, 1354:12

streamlining [1] - 1319:14

Street [1] - 1265:15

stress [4] - 1298:16, 1298:17, 1353:43, 1375:3

stressed [4] - 1350:24, 1350:27, 1353:46, 1355:14

stressful [1] - 1374:34

stretches [1] - 1304:1

strictly [1] - 1304:45

striking [1] - 1393:1

studies [1] - 1369:12

study [1] - 1375:16

stuff [1] - 1374:6

style [1] - 1319:8

sub [4] - 1274:38, 1313:30, 1314:11, 1314:12

sub-optimal [2] - 1314:11, 1314:12

sub-optimally [2] - 1274:38, 1313:30

subject [4] - 1315:39, 1315:42, 1392:28, 1394:32

subjective [1] - 1336:26

submission [2] - 1324:6, 1381:13

subparagraph [1] - 1267:9

subsection [3] - 1267:26, 1267:30

subsequent [10] - 1291:25, 1295:36, 1303:11, 1316:16, 1329:36, 1344:14, 1394:17, 1396:46, 1397:2, 1397:17

subsequently [1] - 1306:41

substantial [5] - 1272:40, 1272:42, 1378:44, 1379:3, 1395:38

suddenly [1] - 1298:5

suggest [28] - 1308:28, 1308:45, 1309:3, 1309:4, 1310:8, 1329:16, 1334:2, 1334:4, 1334:6, 1341:17, 1341:29, 1342:26, 1342:36, 1343:46, 1344:1, 1344:18, 1344:33, 1344:40, 1347:8, 1379:14, 1383:42, 1386:41, 1387:4, 1390:42, 1391:13, 1391:29, 1394:8, 1396:32

suggested [7] - 1278:12, 1324:28, 1325:5, 1337:33, 1343:27, 1368:39, 1384:32

suggesting [3] - 1345:24, 1345:28, 1385:5

suggestion [2] - 1343:47, 1368:32

suggestions [3] - 1296:38, 1307:30,

1398:27	swearing [1] -	1375:19, 1377:7,	themselves [3] -	1397:38
suit [1] - 1350:39	1344:12	1382:38, 1382:47,	1332:27, 1362:24,	tomorrow [4] -
summarised [1] -	swore [1] - 1344:4	1384:11, 1385:35	1362:28	1399:41, 1399:44,
1377:11	sworn [1] - 1351:3	teams [6] - 1280:16,	there [1] - 1339:30	1400:47, 1401:1
superior [1] - 1327:41	synthesised [1] -	1322:10, 1324:2,	thereafter [3] -	tone [1] - 1303:42
support [16] -	1388:23	1375:13, 1376:43,	1293:23, 1343:17,	took [23] - 1269:37,
1297:19, 1304:9,	system [9] - 1286:10,	1377:8	1397:4	1275:11, 1275:16,
1304:11, 1304:17,	1360:43, 1378:40,	technical [3] -	thereby [1] - 1315:28	1277:44, 1283:14,
1305:19, 1305:24,	1380:37, 1381:5,	1311:47, 1312:3,	Therese [5] - 1374:20,	1294:9, 1294:24,
1318:20, 1339:9,	1381:7, 1381:12,	1315:11	1374:29, 1374:31,	1298:15, 1309:5,
1371:9, 1372:6,	1381:21, 1399:14	telephone [1] -	1376:4, 1376:5	1318:23, 1341:38,
1378:9, 1378:15,	system [1] - 1378:27	1377:46	they have [3] -	1354:43, 1363:7,
1382:10, 1389:36,		tempering [1] -	1270:21, 1325:9,	1363:13, 1365:9,
1395:20, 1395:24		1340:46	1325:13	1365:16, 1365:27,
Support [1] - 1378:8		tend [2] - 1330:27,	they've [1] - 1358:26	1365:44, 1369:47,
supported [3] -	T	1368:42	thinking [4] - 1359:36,	1373:13, 1373:42,
1280:14, 1296:47,	T-shirt [1] - 1380:31	tendency [1] -	1365:34, 1371:27,	1383:44, 1393:46
1394:45	table [2] - 1334:18,	1326:21	1389:47	top [10] - 1267:25,
supportive [1] -	1400:40	tender [10] - 1267:19,	third [5] - 1327:34,	1285:33, 1303:4,
1298:46	talks [1] - 1309:20	1351:24, 1367:36,	1327:36, 1329:24,	1308:17, 1357:21,
suppose [2] - 1313:3,	tallies [6] - 1361:8,	1377:15, 1386:8,	1382:46, 1384:10	1367:26, 1371:26,
1383:21	1361:13, 1361:16,	1386:10, 1391:37,	Thomas [1] - 1266:21	1377:33, 1388:46,
supposed [1] -	1361:19, 1361:47,	1392:2, 1393:12,	thoroughly [2] -	1398:21
1306:15	1362:21	1398:45	1287:21, 1391:25	topic [7] - 1315:26,
surely [1] - 1311:7	tally [2] - 1326:5,	tendered [1] - 1351:19	thoughts [6] -	1344:34, 1354:31,
surname [1] - 1320:11	1326:12	tendering [1] -	1282:18, 1346:10,	1362:33, 1372:9,
surprise [1] - 1313:24	tape [3] - 1357:9,	1399:10	1396:45, 1397:16,	1373:36, 1395:9
surprised [9] -	1357:25, 1380:4	tenor [1] - 1324:8	1397:21, 1397:26	tossed [1] - 1375:40
1278:26, 1278:27,	tape-lift [1] - 1357:9	term [7] - 1300:39,	three [7] - 1289:25,	total [1] - 1284:18
1305:37, 1344:37,	tape-lifts [1] - 1380:4	1322:34, 1323:27,	1289:27, 1318:47,	touch [1] - 1280:24
1345:34, 1359:6,	task [2] - 1283:26,	1323:30, 1323:31,	1329:43, 1370:41,	touched [3] - 1318:3,
1359:14, 1359:25,	1297:11	1323:33	1394:2, 1396:15	1343:40, 1394:47
1360:9	taste [1] - 1345:21	terminology [1] -	threshold [1] -	towards [5] - 1317:38,
surrounding [2] -	Taylor [3] - 1399:43,	1323:40	1271:18	1317:45, 1343:10,
1299:6, 1337:47	1400:38, 1400:43	terms [14] - 1304:4,	throughout [1] -	1370:36, 1394:8
survey [12] - 1307:34,	team [59] - 1271:25,	1313:22, 1317:24,	1312:33	track [6] - 1279:17,
1307:37, 1307:42,	1280:26, 1280:27,	1371:3, 1380:43,	throw [4] - 1306:1,	1361:15, 1363:23,
1307:46, 1308:3,	1281:7, 1289:3,	1382:14, 1384:36,	1306:3, 1306:36,	1392:31, 1392:32,
1308:6, 1309:17,	1297:35, 1297:36,	1385:28, 1392:20,	1307:20	1392:36
1309:27, 1310:4,	1298:5, 1298:6,	1396:9, 1396:20,	Thursday [1] -	tracking [1] - 1393:2
1310:8, 1310:14,	1300:23, 1300:43,	1396:28, 1397:20,	1265:20	trained [1] - 1287:33
1310:18	1308:17, 1316:29,	1397:27	tie [1] - 1286:46	transferred [1] -
surveys [1] - 1307:33	1321:47, 1322:9,	terrifying [2] -	ties [1] - 1300:1	1313:43
Susan [1] - 1265:33	1322:47, 1323:47,	1304:35, 1304:36	timeline [3] - 1297:45,	transmitted [1] -
suspect [6] - 1276:40,	1324:16, 1325:4,	terse [6] - 1326:22,	1338:14, 1393:43	1314:10
1283:11, 1283:23,	1332:35, 1337:41,	1326:35, 1327:4,	timing [1] - 1352:33	transpired [1] -
1303:6, 1371:45,	1338:4, 1338:18,	1342:42, 1343:21,	titled [1] - 1303:33	1297:27
1381:31	1338:19, 1338:28,	1343:22	TO [6] - 1367:47,	traumatic [1] -
suspected [2] -	1338:29, 1338:37,	test [1] - 1397:33	1368:8, 1377:24,	1304:23
1320:43, 1380:32	1338:41, 1339:2,	tested [3] - 1277:29,	1391:46, 1393:20,	traumatised [1] -
swab [15] - 1276:29,	1339:10, 1339:14,	1386:45, 1396:16	1401:8	1304:31
1295:3, 1357:8,	1339:20, 1351:10,	TESTING [1] - 1265:6	today [2] - 1333:28,	treated [2] - 1297:4,
1357:11, 1357:15,	1353:22, 1353:26,	testing [2] - 1278:43,	1346:43	1335:35
1357:20, 1357:21,	1354:11, 1354:23,	1380:16	together [9] - 1307:15,	treatment [2] - 1299:7,
1357:35, 1357:40,	1354:33, 1356:11,	tests [1] - 1369:20	1349:31, 1353:18,	1299:20
1358:6, 1358:28,	1356:21, 1356:24,	text [3] - 1310:3,	1355:19, 1356:24,	triangulating [1] -
1371:33, 1371:35,	1356:35, 1358:46,	1310:4, 1396:30	1373:24, 1380:24,	1334:43
1380:31	1359:2, 1362:10,	theme [1] - 1360:23	1391:7, 1393:5	trick [2] - 1320:15,
swabs [1] - 1380:4	1362:12, 1362:17,	themes [2] - 1310:13,	toing [1] - 1397:38	1389:14
swear [1] - 1344:6	1363:18, 1366:46,	1396:11	toing-and-froing [1] -	tried [4] - 1304:36,
	1368:32, 1370:15,			

1304:43, 1310:47, 1372:4 trouble [1] - 1378:4 troublemakers [1] - 1300:24 true [11] - 1267:16, 1278:19, 1304:46, 1325:7, 1330:16, 1330:39, 1334:6, 1341:7, 1341:10, 1341:15, 1346:11 truly [1] - 1324:30 trust [1] - 1335:19 try [10] - 1307:23, 1316:19, 1341:26, 1353:18, 1353:33, 1354:18, 1355:4, 1361:28, 1363:28, 1363:39 trying [17] - 1269:10, 1279:18, 1297:42, 1298:46, 1305:1, 1323:45, 1331:20, 1345:42, 1353:3, 1354:40, 1360:32, 1363:37, 1366:8, 1384:41, 1389:14, 1391:7, 1395:9 Ts [1] - 1361:38 tube [10] - 1357:8, 1357:13, 1357:15, 1357:19, 1357:29, 1357:37, 1357:46, 1358:11, 1379:9, 1379:20 tubes [1] - 1285:39 turkey's [1] - 1307:21 turn [3] - 1289:1, 1306:35, 1372:14 turnaround [2] - 1378:33, 1381:11 turning [1] - 1372:33 twenty [1] - 1342:4 twice [1] - 1316:34 two [29] - 1267:9, 1273:24, 1307:1, 1315:2, 1316:8, 1316:12, 1324:1, 1329:46, 1330:11, 1330:19, 1330:23, 1330:26, 1351:15, 1351:18, 1367:36, 1377:7, 1377:9, 1379:12, 1383:37, 1387:9, 1387:12, 1387:24, 1388:20, 1390:19, 1393:9, 1394:2, 1398:7, 1398:9 type [3] - 1284:18,	1351:32, 1380:35 types [2] - 1360:21, 1371:27 typically [1] - 1326:42 <hr/> U <hr/> ultimate [2] - 1288:1, 1396:1 ultimately [12] - 1273:14, 1276:32, 1284:28, 1285:9, 1286:44, 1289:11, 1305:24, 1324:7, 1384:35, 1386:4, 1393:40, 1396:40 unable [1] - 1306:29 unacceptably [1] - 1378:37 unanimous [1] - 1359:1 uncomfortable [2] - 1311:21, 1327:14 under [10] - 1272:21, 1272:24, 1283:2, 1295:9, 1300:2, 1314:25, 1315:2, 1386:3, 1387:1, 1392:19 underlining [1] - 1393:1 undermine [2] - 1347:12, 1347:23 undermining [4] - 1347:31, 1347:35, 1347:38 underperforming [1] - 1301:28 underpinned [1] - 1332:3 underpins [1] - 1332:5 understood [5] - 1271:11, 1288:6, 1312:32, 1322:36, 1349:4 undertake [2] - 1308:27, 1368:32 undertaken [3] - 1277:30, 1278:1, 1294:5 undoubtedly [3] - 1324:19, 1324:36, 1324:42 unhappiness [1] - 1299:6 unhappy [1] - 1332:20 union [4] - 1304:8, 1304:11, 1304:17, 1306:31 Unit [1] - 1307:43	unit [1] - 1347:11 unknown [1] - 1283:10 unless [5] - 1268:41, 1269:24, 1280:29, 1280:46, 1347:28 unlocked [1] - 1305:45 unresponsive [1] - 1345:10 unrest [3] - 1334:45, 1334:47, 1335:24 unsound [1] - 1331:46 unsuitable [1] - 1314:3 unsure [1] - 1364:32 unsurprising [1] - 1310:9 unusable [2] - 1329:12, 1329:18 unusual [1] - 1330:22 unwell [1] - 1275:39 up [68] - 1269:8, 1276:11, 1280:32, 1288:42, 1288:46, 1294:13, 1294:25, 1294:47, 1299:32, 1300:20, 1302:40, 1303:5, 1304:13, 1306:35, 1307:11, 1310:33, 1315:11, 1317:10, 1317:11, 1317:24, 1323:31, 1328:6, 1328:25, 1329:33, 1329:34, 1334:39, 1341:12, 1341:33, 1342:15, 1344:14, 1344:20, 1345:29, 1349:26, 1350:22, 1354:11, 1354:17, 1355:37, 1355:42, 1356:40, 1358:37, 1359:27, 1361:21, 1361:24, 1361:31, 1362:9, 1362:10, 1363:17, 1367:26, 1368:33, 1368:37, 1373:17, 1374:22, 1374:24, 1374:29, 1375:29, 1376:4, 1378:3, 1382:29, 1382:41, 1383:12, 1385:3, 1388:46, 1390:8, 1396:21, 1398:5, 1398:9, 1398:11, 1399:47 updated [2] - 1388:4, 1388:13 upset [3] - 1302:11,	1335:31, 1337:30 upshot [1] - 1370:12 urgency [2] - 1363:31, 1369:14 useable [7] - 1269:2, 1277:44, 1279:45, 1328:41, 1329:6, 1329:7 useful [3] - 1315:23, 1346:29, 1372:5 usual [1] - 1383:19 <hr/> V <hr/> vaginal [4] - 1291:10, 1291:32, 1371:33, 1371:35 vague [1] - 1354:10 valid [1] - 1348:25 validate [1] - 1269:24 validated [3] - 1280:25, 1284:41 validations [1] - 1399:43 value [2] - 1280:2, 1392:36 values [3] - 1280:10, 1314:45, 1346:23 Vanessa [2] - 1359:46, 1360:4 variability [1] - 1316:15 various [2] - 1280:16, 1370:7 variously [1] - 1334:16 verifying [1] - 1335:13 version [14] - 1320:17, 1334:44, 1335:9, 1335:13, 1335:41, 1366:27, 1383:12, 1383:13, 1383:15, 1383:24, 1383:30, 1395:23, 1395:34, 1395:43 versions [3] - 1334:43, 1335:10, 1393:39 versus [1] - 1348:26 via [2] - 1285:22, 1327:34 vicinity [1] - 1339:38 victim [1] - 1289:46 videolink [2] - 1399:44, 1399:47 view [24] - 1279:3, 1280:2, 1281:25, 1294:31, 1297:3, 1298:30, 1315:42, 1316:31, 1319:34,	1319:37, 1324:42, 1335:8, 1335:33, 1337:1, 1337:25, 1341:4, 1341:22, 1359:1, 1363:6, 1363:7, 1363:12, 1370:1, 1380:13, 1389:23 view [1] - 1341:22 views [7] - 1324:27, 1324:41, 1324:46, 1325:14, 1340:28, 1341:17, 1379:17 vigilant [1] - 1269:9 visibility [1] - 1313:39 visible [1] - 1361:15 vidid [1] - 1356:19 vividly [2] - 1355:13, 1390:2 voice [1] - 1334:17 volume [1] - 1319:30 <hr/> W <hr/> wait [1] - 1346:27 walked [1] - 1329:44 Walter [1] - 1265:26 wants [1] - 1367:28 wash [1] - 1285:21 wasted [1] - 1278:4 wasting [1] - 1313:33 watch [1] - 1306:8 watching [1] - 1306:4 water [1] - 1357:36 watered [2] - 1341:7, 1341:18 ways [5] - 1308:10, 1354:18, 1360:5, 1363:28, 1380:19 wearing [2] - 1380:32 Wednesday [1] - 1306:30 week [2] - 1399:41, 1400:44 weeks [6] - 1306:2, 1351:15, 1373:32, 1373:33, 1374:32, 1383:37 weigh [4] - 1317:10, 1317:11, 1317:24, 1359:26 weight [2] - 1282:35, 1371:42 welfare [2] - 1297:20, 1336:10 wellbeing [1] - 1340:45 wells [4] - 1285:34, 1285:40, 1285:42, 1286:1
--	--	---	--	---

whereas [6] - 1277:37, 1291:25, 1314:25, 1336:38, 1336:39, 1347:37	[2] - 1387:38, 1391:47 WIT.0014.0144.0001 [1] - 1392:13 WIT.0014.0144.0001] [1] - 1391:11 WIT.0014.0145.0001 [1] - 1393:21 WIT.0014.0145.0001] [1] - 1392:19 WIT.0014.0146.0001 [1] - 1393:32 WIT.0014.0146.0001] [1] - 1392:45 WIT.0014.0147.0001 [2] - 1394:19, 1396:22 withdraw [3] - 1280:21, 1299:43, 1365:11 WITHDREW [1] - 1350:37 witness [15] - 1266:3, 1266:42, 1277:1, 1280:46, 1324:40, 1346:29, 1347:33, 1347:42, 1348:4, 1384:3, 1387:37, 1390:30, 1398:44, 1399:40, 1400:43 WITNESS [8] - 1299:46, 1334:31, 1339:5, 1339:14, 1342:10, 1345:16, 1345:20, 1350:37 witnesses [3] - 1349:30, 1349:43, 1399:8 woman [2] - 1283:6, 1336:37 wonder [2] - 1311:24, 1399:45 wonderful [1] - 1361:47 Woolridge [4] - 1266:43, 1270:17, 1301:46, 1378:26 word [6] - 1289:1, 1295:31, 1316:12, 1375:32, 1388:39 word-for-word [1] - 1289:1 wording [1] - 1388:32 words [6] - 1271:39, 1300:32, 1339:8, 1353:46, 1362:3, 1391:29 workaround [23] - 1292:25, 1292:41, 1293:13, 1293:29, 1293:43, 1294:23, 1295:16, 1295:22, 1332:18, 1363:44, 1364:6, 1364:13, 1364:16, 1364:19, 1365:19, 1365:28, 1365:38, 1366:16, 1366:17, 1366:32, 1368:13, 1369:22, 1370:29 workers [1] - 1332:34 workflow [2] - 1280:15, 1281:28 workings [1] - 1383:44 workplace [26] - 1299:7, 1301:3, 1303:17, 1303:18, 1304:7, 1306:16, 1306:26, 1306:27, 1307:14, 1307:33, 1307:41, 1307:42, 1308:11, 1308:30, 1308:35, 1308:46, 1309:8, 1309:17, 1309:21, 1310:9, 1310:14, 1311:13, 1347:25, 1350:26, 1372:25, 1372:26 Workplace [11] - 1301:2, 1302:16, 1303:11, 1340:1, 1340:10, 1340:22, 1340:33, 1348:34, 1375:12, 1375:15, 1376:36 workshop [1] - 1308:2 workshop [1] - 1308:19 worried [2] - 1299:2, 1303:43 worry [2] - 1371:22, 1400:34 worse [1] - 1320:26 worst [1] - 1353:47 write [1] - 1302:4 writing [4] - 1279:27, 1302:9, 1389:45, 1399:3 written [1] - 1356:34 wrongly [3] - 1295:23, 1295:41, 1295:47 wrote [4] - 1274:33, 1275:20, 1275:42, 1275:44 Wyman [6] - 1301:38, 1302:4, 1303:4, 1303:12, 1377:34, 1377:44 Wyman-Clarke [6] -	1301:38, 1302:4, 1303:4, 1303:12, 1377:34, 1377:44
<hr/> Y <hr/>		
year [20] - 1267:4, 1268:12, 1268:46, 1269:46, 1270:5, 1278:22, 1280:19, 1283:19, 1285:11, 1299:37, 1309:13, 1309:17, 1313:17, 1318:13, 1318:15, 1323:20, 1323:21, 1343:33, 1343:34, 1361:41 years [22] - 1288:27, 1288:31, 1288:35, 1294:24, 1296:7, 1299:32, 1312:25, 1314:33, 1314:38, 1314:44, 1314:46, 1317:6, 1319:8, 1319:12, 1326:47, 1343:9, 1344:14, 1347:18, 1350:16, 1361:43, 1370:41 yelled [1] - 1342:30 yelling [2] - 1342:45, 1343:12 yellow [1] - 1397:12 yesterday [2] - 1333:25, 1350:11 yielded [1] - 1384:31 young [1] - 1283:6 yourself [14] - 1286:21, 1300:27, 1334:21, 1338:29, 1338:38, 1362:39, 1371:9, 1376:18, 1384:15, 1385:13, 1385:39, 1387:28, 1387:43, 1392:25 yourselves [1] - 1322:23	<hr/> Z <hr/>	zero [1] - 1392:9 ZERO [1] - 1392:12
whereas [6] - 1277:37, 1291:25, 1314:25, 1336:38, 1336:39, 1347:37 whereby [2] - 1285:13, 1367:4 whilst [3] - 1283:31, 1291:17, 1309:7 whispers [2] - 1327:34, 1327:36 whole [16] - 1281:37, 1283:28, 1308:16, 1318:23, 1318:29, 1318:33, 1331:21, 1335:23, 1337:10, 1350:2, 1355:33, 1355:34, 1356:21, 1360:44, 1369:15, 1369:47 wider [2] - 1353:36, 1353:40 willingness [1] - 1308:39 window [1] - 1297:18 windows [1] - 1297:18 wish [3] - 1267:13, 1341:43, 1350:35 WIT.0002.0096.0001 [1] - 1368:10 WIT.0002.0096.0001] [1] - 1366:36 WIT.0006.0145.0001 [1] - 1351:29 WIT.0006.0145.0001] [1] - 1351:21 WIT.0006.0154.0001] [1] - 1372:21 WIT.0006.0165.0001 [1] - 1377:25 WIT.0006.0165.0001] [1] - 1376:32 WIT.0011.0010.0001 [1] - 1267:39 WIT.0011.0010.0001] [1] - 1266:43 WIT.0011.0013.0001] [1] - 1270:12 WIT.0011.0016.0001] [1] - 1274:27 WIT.0011.0017.0001] [1] - 1275:43 WIT.0011.0018.0001] [1] - 1281:43 WIT.0011.0021.0001_ R] [1] - 1348:35 WIT.0011.0022.0001] [1] - 1301:46 WIT.0011.0023.0001] [1] - 1304:1 WIT.0014.0143.0001		