



Mr John Robinson  
C/o Mr John McBurney  
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3-7 Church Square  
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By email to: [johnmcburneysolicitors@gmail.com](mailto:johnmcburneysolicitors@gmail.com)

6 February 2019

Dear Sir

**Re: The Independent Public Inquiry into the Non Domestic Renewable Heat Incentive (RHI) Scheme**  
**Provision of a Section 21 Notice requiring the provision of evidence in the form of a written statement**

I am, once again, writing to you in my capacity as Solicitor to the Independent Public Inquiry into the Non Domestic Renewable Heat Incentive (RHI) Scheme (known as 'the RHI Inquiry').

I assume that, by reason of your previous interactions with the Inquiry (including the provision of written and oral evidence to it), you remain familiar with the Inquiry's Terms of Reference.

As you may be aware, the Inquiry continues to seek some further written evidence from witnesses and participants, particularly where issues have arisen in evidence recently provided in respect of which it is necessary, or appropriate, to provide an opportunity for further response. The Inquiry Chairman also retains the right to require witnesses to attend to provide further oral evidence, and consideration will

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Chairman: **Rt Hon Sir Patrick Coghlin** | Secretary: **Andrew Browne** | Solicitor: **Patrick Butler**

be given to whether that is necessary in light of additional written evidence which is received.

As part of its further investigations, the Inquiry has obtained disclosure of emails from various accounts within the control of the DUP (pursuant to Section 21 Notice 230 of 2018). Arising out of the Inquiry's analysis of those emails, please find enclosed with this letter a further Section 21 Notice requiring you to provide further evidence to the RHI Inquiry Panel in the form of a written statement addressing the matters identified in the Schedule to the Section 21 Notice.

In the interests of fairness, you are also encouraged to provide, through the further written statement now being requested of you, any additional information that you can which is relevant to the Inquiry's investigation of the matters falling within its Terms of Reference in relation to any of its phases, in light of any additional matters which have emerged during the course of the Inquiry's evidence-gathering processes.

As the text of the Section 21 Notice explains, you are required by law to comply with it.

As before, it is vital that the further witness statement you provide to the Inquiry is your own evidence, absent the influence of others; that it is comprehensive; and that it fully explains your involvement in the matters about which you have been asked.

In the event that you require or desire access to some documentation, not already in your possession, in order to assist you in preparing your statement, please revert to me.

The questions in the attached notice refer to various documents. For the most part, these documents have already been provided to you or your solicitor. Where they have not, a copy of the relevant document is enclosed with the Notice.

I also remind you, as before, of the restriction orders made by the Chairman of the RHI Inquiry, which affect how you may deal with this correspondence and its

enclosures (which are also provided to you under a duty of confidentiality to the RHI Inquiry). You may, of course, share the correspondence and the enclosed Notice and documents with your legal representative(s), under the same conditions as I set out in my previous correspondence.

Given the tight time-frame within which the RHI Inquiry must operate, the Chairman of the Inquiry would be grateful if you would comply with the requirements of the Section 21 Notice as soon as possible and, in any event, by the date set out for compliance in the Notice itself.

A copy of this correspondence has also been provided to your legal representative, John McBurney of John McBurney Solicitors (by email only).

Finally, I would be grateful if you could acknowledge receipt of this correspondence and the enclosed notice by email to [Patrick.Butler@rhiinquiry.org](mailto:Patrick.Butler@rhiinquiry.org).

Please do not hesitate to contact me to discuss any matter arising.

Yours faithfully



**Patrick Butler**

Solicitor to the RHI Inquiry

02890408928

**SCHEDULE****[No 7 of 2019]***Emails from DARD and/or CAFRE relevant to the RHI Scheme*

1. Emails disclosed by the DUP in response to Section 21 Notice 230 of 2018 reveal that the DUP received a number of emails from DARD and/or CAFRE in the period 2012 to 2016 promoting educational and/or training events at which the RHI Scheme was to be considered. Below is a non-exhaustive list of such emails:

- a. **POL-23001 to 23003;**
- b. **POL-42013 to 42015;**
- c. **POL-42026 to 42030;**
- d. **POL-42061 to 42064;**
- e. **POL-42071;**
- f. **POL-42072 to 42078;**
- g. **POL-42080 to 42082;**
- h. **POL-42083 to 42085;**
- i. **POL-42086 to 42089;**
- j. **POL-42092 to 42093;**
- k. **POL-42098 to 42101;**
- l. **POL-25001 to 25004;**
- m. **POL-42104 to 42107;**
- n. **POL-42111 to 42114;**
- o. **POL-42119 to 42123;**
- p. **POL-42124 to 42127;**
- q. **POL-42128 to 42131;**
- r. **POL-42133 to 42136;**
- s. **POL-42137 to 42140;**
- t. **POL-42142 to 42145;**
- u. **POL-38141 to 38144;**
- v. **POL-42150 to 42153;**
- w. **POL-42162 to 42166;**

- x. **POL-42166 to 42169;**
- y. **POL-42170 to 42173;**
- z. **POL-42287 to 42290;**
- aa. **POL-38628 to 38631.**

A number of the aforementioned emails (such as those referred to at sub-paragraphs m, o, and w above) suggested that payback periods for farmers in the poultry and mushroom sectors who invested in renewable heating systems could be 3 years or less under the RHI Scheme.

Further emails disclosed by the DUP to the Inquiry reveal that Andrew Crawford appears to have received from DARD and/or CAFRE, and then forwarded to you, some of the above emails, a non-exhaustive list of which is set out below:

- bb. **POL-39179 to 39182.**

You are hereby required to address, comprehensively and in detail, the following issues which arise in respect of the aforementioned emails:

- i. Clarify whether you accept receiving all of the emails identified at sub-paragraphs a to bb above and –
  - 1. In respect of each of those emails which you accept you received, confirm the date of receipt;
  - 2. In respect of those emails (if any) which you deny you received, please identify same clearly;
  - 3. If it is the case that you deny you received some of the said emails but accept being made aware of their contents, please provide full details of this including when and by whom you were made so aware;
- ii. Without prejudice to the generality of the foregoing request, confirm (1) that receipt of the emails identified at sub-paragraphs m, o, u, and w above would have, from as early as October 2013

(POL-42104 to 42107 refers), alerted a reader to the potentially short payback periods and high returns available under the RHI Scheme for users with high heat demands such as those in the poultry broiler and mushroom farming sectors, and (2) that you were so alerted or, in the event that you contend that you were not so alerted, provide an explanation for this and clarify how and when you first became aware of the potentially short payback periods and high returns available under the RHI Scheme for users with high heat demands;

- iii. Clarify whether, and if so in what respects and to what extent, you wish to amend or correct any evidence previously provided by you to the Inquiry in light of your answers to the foregoing questions.

### *Energy Issues in the DUP*

2. A number of emails disclosed to the Inquiry by the DUP or its members suggest that, within the DUP (and distinct from his engagement with Timothy Cairns regarding the RHI Scheme during the summer of 2015), the input, assistance and/or view of Andrew Crawford was sought on energy issues even when he was not the SpAd in DETI. Examples of this (of which you appear to have been aware) include the following:

- a. **POL-46881 to 46882** (July 2016);
- b. **POL-46888** (July 2016);
- c. **POL-46913** (July 2016);

In the circumstances, please address the following issues:

- i. Explain the role(s) (formal and/or informal) that Andrew Crawford performed within the DUP in respect of energy matters following his move from the position of DETI SpAd as well as the reasons why he performed the said role(s);

- ii. Clarify whether each of the following persons was, at each relevant time and to the best of your knowledge, aware of the said role(s) being performed by Andrew Crawford:
  1. You (both before you took up your role as DETI SpAd and thereafter);
  2. The Minister Andrew Crawford then served as SpAd;
  3. The DETI Minister;
- iii. To the best of your knowledge, set out whether continued involvement of a SpAd in issues which were no longer within his appointing Minister's remit was a practice which occurred on other occasions within the DUP (and, if to your knowledge it did, provide details of this).

*Timothy Johnston's Status within the DUP*

3. In both your oral evidence to the Inquiry (see, for example, **TRA-13797 to 13807**) and Timothy Johnston's oral evidence to the Inquiry (see, for example, **TRA-14207 to 14223**) the question of Mr Johnston's standing within the DUP, and in particular whether there existed a hierarchy in which he stood above certain ministers, MLAs, SpAds, and party employees, was explored. In a further email disclosed by the DUP to the Inquiry (**POL-22083 to 22084**) it appears that, on 17 September 2015, Mr Johnston advised Jim Wells MLA that he was your '*line manager*'. In light of this email please address the following issues:
  - a. Confirm that at the relevant time Mr Johnston was openly and formally performing the role of your line manager;
  - b. Clarify the period for which, to the best of your knowledge and belief, Mr Johnston occupied that line management role (including, in particular,

whether the arrangement continued whilst you occupied the role of SpAd after the 2016 elections).

*Sending Confidential Documents to Persons Outside the Executive*

4. A series of emails disclosed by the DUP (**POL-46011 to 46027**) reveals that on 3 April 2014, in response to an email asking questions about the RHI Scheme from a person whom the Inquiry believes to be your brother Andrew (POL-46011), you obtained information from Andrew Crawford in the form of a *'lines to take'* document prepared by DETI officials for the then Minister (Mrs Foster) (POL-46017), which you in turn forwarded to your brother (POL-46022) with the instruction that it was *'not for circulation'*. In respect of this sequence of events, please address the following issues:
- a. Confirm whether you accept as accurate the above summary of the interactions between you and your brother at the relevant time or, if you do not accept same, clarify the respects in which you believe the above summary to be inaccurate;
  - b. Confirm whether the *'lines to take'* document was (i) a confidential document, (ii) which was not meant to be circulated to persons such as your brother, and (iii) which you ought not to have circulated it to him;
  - c. Explain your reasons for sharing the said document with your brother;
  - d. Clarify whether your said brother had any link, either direct or indirect (e.g. as a supplier or installer of RHI-eligible plant or equipment), to the RHI Scheme and, if he had such a link, please provide full details of it;
  - e. Provide any further evidence which you consider to be relevant to the above issues including, for the avoidance of doubt, details of whether the sharing of the *'lines to take'* document was an isolated incident of inappropriate disclosure by you or whether such disclosures occurred on a more frequent basis.

*RHI Installation Inspections*

5. The Inquiry has received from the DUP a series of internal emails (**POL-46881 to 46882, 46888 to 46896 and 46913**) from July 2016 in which you and other persons discussed DfE's proposals regarding inspections of RHI-accredited installations. In an email of 11 July 2016 from you to Timothy Johnston and a number of other DUP SpAds and Ministers you stated as follows: *'A McC has been slow on this and is trying to broaden it as much as possible. There is a real reluctance to have inspections'* (POL-46888). In respect of this series of emails, and that of 11 July 2016 in particular, please address the following issues:
- a. Clarify whether *'A McC'* was a reference to Dr Andrew McCormick or, if it was not a reference to him, provide the name of the person to whom you were in fact referring;
  - b. Provide the following details in respect of the *'real reluctance to have inspections'*:
    - i. Identify the persons or bodies who were so reluctant;
    - ii. Set out the reasons (if any) being advanced to justify or explain such reluctance;
    - iii. Set out the actions (if any) taken or procured by you or by others within the DUP (such as, for example, your appointing Minister) to overcome such reluctance.

*General*

6. Finally, please provide any additional evidence which you consider to be relevant to the Inquiry's Terms of Reference, or of which you consider it should be aware, having regard to (a) any additional information and documentation which is now available to you (in particular, but without prejudice to the generality of the foregoing, emails disclosed by you to the Inquiry including those summarised above), (b) your knowledge of the evidence of other parties in the Inquiry proceedings, and/or (c) any further developments or communications you have had with others.

**NOTE:**

It is important for the efficiency of the RHI Inquiry that the issues identified above are addressed as fully as possible and by reference, where available, to the dates and locations of specific incidents to which reference is made. The statement should be broken down into paragraphs, which should be numbered sequentially from '1' to the end. The use of appropriate section headings or sub-headings is also encouraged. A template witness statement is provided with this Notice for your assistance and should be used as the format for your response.



**INQUIRY INTO THE RENEWABLE HEAT INCENTIVE SCHEME**

**RHI REF: Notice 7 of 2019**

**DATE: 20 February 2019**

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**Witness Statement of:                      JOHN ROBINSON**

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*Emails from DARD and/or CAFRE relevant to the RHI Scheme*

1.     Emails disclosed by the DUP in response to Section 21 Notice 230 of 2018 reveal that the DUP received a number of emails from DARD and/or CAFRE in the period 2012 to 2016 promoting educational and/or training events at which the RHI Scheme was to be considered. Below is a non-exhaustive list of such emails:

- a. **POL-23001 to 23003;**
- b. **POL-42013 to 42015;**
- c. **POL-42026 to 42030;**
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- r. **POL-42133 to 42136;**
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- x. **POL-42166 to 42169;**
- y. **POL-42170 to 42173;**
- z. **POL-42287 to 42290;**
- aa. **POL-38628 to 38631.**

A number of the aforementioned emails (such as those referred to at sub-paragraphs m, o, and w above) suggested that payback periods for farmers in the poultry and mushroom sectors who invested in renewable heating systems could be 3 years or less under the RHI Scheme.

Further emails disclosed by the DUP to the Inquiry reveal that Andrew Crawford appears to have received from DARD and/or CAFRE, and then forwarded to you, some of the above emails, a non-exhaustive list of which is set out below:

- bb. **POL-39179 to 39182.**

You are hereby required to address, comprehensively and in detail, the following issues which arise in respect of the aforementioned emails:

- i. Clarify whether you accept receiving all of the emails identified at sub-paragraphs a to bb above and –
  1. In respect of each of those emails which you accept you received, confirm the date of receipt;
  2. In respect of those emails (if any) which you deny you received, please identify same clearly;
  3. If it is the case that you deny you received some of the said emails but accept being made aware of their



contents, please provide full details of this including when and by whom you were made so aware;

The only email I seem to have received from the list, a-bb, seems to be of 14 December 2016 i.e. POL-39179 to 39182 as forwarded by Andrew Crawford. This email is not in my inbox. I don't specifically recall receiving it but wouldn't rule out that as part of the December 2016 search to deal with various questions being raised about the Scheme, that it may have arisen.

I don't believe I was ever a recipient of the [DARD.Press-office@dardni.gov.uk](mailto:DARD.Press-office@dardni.gov.uk) email address. I was a party employee at that time rather than a special adviser. This may have been a civil service internal information service.

- ii. Without prejudice to the generality of the foregoing request, confirm (1) that receipt of the emails identified at subparagraphs m, o, u, and w above would have, from as early as October 2013 (POL-42104 to 42107 refers), alerted a reader to the potentially short payback periods and high returns available under the RHI Scheme for users with high heat demands such as those in the poultry broiler and mushroom farming sectors, and (2) that you were so alerted or, in the event that you contend that you were not so alerted, provide an explanation for this and clarify how and when you first became aware of the potentially short payback periods and high returns available under the RHI Scheme for users with high heat demands;

As per my previous answer. I don't believe I was ever the recipient of the [DARD.Press-office@dardni.gov.uk](mailto:DARD.Press-office@dardni.gov.uk) email address. Press releases from various departments would have been copied to the DUP Press Office from time to time if it involved a DUP Minister and those statements would then have been posted to the Party website and social media. It would have been a functional role as opposed to anything deeper. In any case, the DARD Minister at that time would have been from Sinn Fein therefore such statements would not have been relevant to that system.

- iii. Clarify whether, and if so in what respects and to what extent, you wish to amend or correct any evidence previously provided by you to the Inquiry in light of your answers to the foregoing questions.

**I do not wish to amend my previous evidence.**

*Energy Issues in the DUP*

2. A number of emails disclosed to the Inquiry by the DUP or its members suggest that, within the DUP (and distinct from his engagement with Timothy Cairns regarding the RHI Scheme during the summer of 2015), the input, assistance and/or view of Andrew Crawford was sought on energy issues even when he was not the SpAd in DETI. Examples of this (of which you appear to have been aware) include the following:

- a. **POL-46881 to 46882** (July 2016);
- b. **POL-46888** (July 2016);
- c. **POL-46913** (July 2016);

In the circumstances, please address the following issues:

- i. Explain the role(s) (formal and/or informal) that Andrew Crawford performed within the DUP in respect of energy matters following his move from the position of DETI SpAd as well as the reasons why he performed the said role(s);

**In July 2016, I had recently become a special adviser to DfE Minister Simon Hamilton. As issues began to emerge with the RHI Scheme, it was natural to avail of the knowledge of a predecessor in that Department. There was no formal role for Andrew Crawford in terms of an energy expert but as an**

**Adviser in DEARA we were colleagues and it was deemed useful to avail of his DETI knowledge about the Scheme.**

**From my perspective, I wanted to have as broad a knowledge of the matter as possible and seek as many opinions as possible to help my Minister devise the best way forward.**

ii. Clarify whether each of the following persons was, at each relevant time and to the best of your knowledge, aware of the said role(s) being performed by Andrew Crawford:

1. You (both before you took up your role as DETI SpAd and thereafter);

**Prior to being a Special Adviser, if a DETI issue had arisen, I would have raised it with the DETI Special Adviser of that time.**

2. The Minister Andrew Crawford then served as SpAd;

**In terms of my contact in 2016 with Dr Crawford regarding the RHI Scheme, I cannot be sure of what knowledge his Minister had.**

3. The DETI Minister;

**Again in 2016 with regard to my contact with Dr Crawford, the DfE Minister would have been aware of my conversations with Dr Crawford.**

iii. To the best of your knowledge, set out whether continued involvement of a SpAd in issues which were no longer within his appointing Minister's remit was a practice which occurred on other occasions within the DUP (and, if to your knowledge it did, provide details of this).

**It would not have been unusual for a former Special Adviser to offer an opinion or for their opinion to be sought on a matter which may have arisen when they**



were in a particular Department. As political Advisers as opposed to expert advisers, they would have had a perspective worth considering. This would not have been a formal role but one of sharing knowledge.

*Timothy Johnston's Status within the DUP*

3. In both your oral evidence to the Inquiry (see, for example, **TRA-13797 to 13807**) and Timothy Johnston's oral evidence to the Inquiry (see, for example, **TRA-14207 to 14223**) the question of Mr Johnston's standing within the DUP, and in particular whether there existed a hierarchy in which he stood above certain ministers, MLAs, SpAds, and party employees, was explored. In a

further email disclosed by the DUP to the Inquiry (**POL-22083 to 22084**) it appears that, on 17 September 2015, Mr Johnston advised Jim Wells MLA that he was your *'line manager'*. In light of this email please address the following issues:

- a. Confirm that at the relevant time Mr Johnston was openly and formally performing the role of your line manager;
- b. Clarify the period for which, to the best of your knowledge and belief, Mr Johnston occupied that line management role (including, in particular, whether the arrangement continued whilst you occupied the role of SpAd after the 2016 elections).

**I am unable to identify precise dates from any records. There was certainly a period running from 2015 through to 2016 when staff issues would have been raised with Mr Johnston as a liaison through to the Party Officers.**



*Sending Confidential Documents to Persons Outside the Executive*

4. A series of emails disclosed by the DUP (**POL-46011 to 46027**) reveals that on 3 April 2014, in response to an email asking questions about the RHI Scheme from a person whom the Inquiry believes to be your brother Andrew (POL-46011), you obtained information from Andrew Crawford in the form of a *'lines to take'* document prepared by DETI officials for the then Minister (Mrs Foster) (POL-46017), which you in turn forwarded to your brother (POL-46022) with the instruction that it was *'not for circulation'*. In respect of this sequence of events, please address the following issues:
- a. Confirm whether you accept as accurate the above summary of the interactions between you and your brother at the relevant time or, if you do not accept same, clarify the respects in which you believe the above summary to be inaccurate;

**POL-46011 to 46027 is a conversation between my brother and I. He was helping the party's candidate 'KB' (Keith Buchanan) canvass for the Local Government election to Mid Ulster Council. As the email indicates, they must have encountered some questions about the RHI Scheme when canvassing. The conversation seems to show he called me by telephone but I was unable to answer and he then emailed to get more information. I was not a civil servant at the time. I was a Party employee in headquarters. It was not uncommon for canvassers to seek answers to questions which may have been raised on doorsteps.**

- b. Confirm whether the *'lines to take'* document was (i) a confidential document, (ii) which was not meant to be circulated to persons such as your brother, and (iii) which you ought not to have circulated it to him;

**I do not consider an approved 'lines-to-take' document to be confidential. It was not in draft form but was a final document. Lines-to-take are developed for public consumption i.e. the line-to-take when you are asked a question. I would probably have advised against further circulation as I was evidently**



away from the office and working remotely therefore had not taken the time to format appropriately for further circulation. In any case, I was not a member of the civil service at that time.

- c. Explain your reasons for sharing the said document with your brother;

**As per part a.**

- d. Clarify whether your said brother had any link, either direct or indirect (e.g. as a supplier or installer of RHI-eligible plant or equipment), to the RHI Scheme and, if he had such a link, please provide full details of it;

**No. I am not aware of any link between my brother and the RHI Scheme. He was not and is not an RHI installer or supplier of RHI-eligible plant or equipment.**

**My brother uses a domestic Air Source Heat Pump to heat his home which was installed in 2012.**

- e. Provide any further evidence which you consider to be relevant to the above issues including, for the avoidance of doubt, details of whether the sharing of the 'lines to take' document was an isolated incident of inappropriate disclosure by you or whether such disclosures occurred on a more frequent basis.

**I was not a civil servant and I do not accept that a lines-to-take document was an 'inappropriate disclosure'. Such a line/position is for public consumption.**

#### *RHI Installation Inspections*

- 5. The Inquiry has received from the DUP a series of internal emails (**POL-46881 to 46882, 46888 to 46896 and 46913**) from July 2016 in which you and other persons discussed DfE's proposals regarding inspections of RHI-accredited installations. In an email of 11 July 2016 from you to Timothy

Johnston and a number of other DUP SpAds and Ministers you stated as follows: *'A McC has been slow on this and is trying to broaden it as much as possible. There is a real reluctance to have inspections'* (POL-46888). In respect of this series of emails, and that of 11 July 2016 in particular, please address the following issues:

- a. Clarify whether *'A McC'* was a reference to Dr Andrew McCormick or, if it was not a reference to him, provide the name of the person to whom you were in fact referring;

**Yes, it refers to Dr McCormick.**

- b. Provide the following details in respect of the *'real reluctance to have inspections'*:
  - i. Identify the persons or bodies who were so reluctant;
  - ii. Set out the reasons (if any) being advanced to justify or explain such reluctance;
  - iii. Set out the actions (if any) taken or procured by you or by others within the DUP (such as, for example, your appointing Minister) to overcome such reluctance.

**When Minister Hamilton and I were first appraised of the RHI Scheme issues, our first instinct was to have 100% inspections and to announce such inspections publicly to discourage those abusing the Scheme. This was against a background of Ofgem pre-warning recipients about when an inspection was due.**

**I would be reluctant to name individual civil servants but there seemed to be a favoured option of changing the Scheme structure rather than challenging fraud via inspections. Indeed, when inspections were being considered, it was always about inspecting a percentage of the recipients as opposed to 100% of recipients. I could understand that point of view from a cost point of view but**

**with the Scheme costs out of control, I felt it useful for recipients to realise that they would be facing an inspection.**

**Minister Hamilton wanted a new structure but also full investigations of fraud via inspections.**

**Indeed, on the day POL-46888 refers to, Minister Hamilton was in London. He had a very firm telephone call with Dr McCormick in which he restated his determination that a process was put in place to get inspections under way. This had been discussed for a number of weeks at that point but there was no sign of progress. The Minister was growing increasingly frustrated as this was on the back of the Audit Office report and the Minister wanted to be able to show that action was being taken.**

*General*

6. Finally, please provide any additional evidence which you consider to be relevant to the Inquiry's Terms of Reference, or of which you consider it should be aware, having regard to (a) any additional information and documentation which is now available to you (in particular, but without prejudice to the generality of the foregoing, emails disclosed by you to the Inquiry including those summarised above), (b) your knowledge of the evidence of other parties in the Inquiry proceedings, and/or (c) any further developments or communications you have had with others.

**If anything further comes to mind I will pass it on.**



Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed:

Dated: 20 February 2019