

**2022 Special Commission of Inquiry
into LGBTIQ hate crimes**

**Before: The Commissioner,
The Honourable Justice John Sackar**

**At Level 2, 121 Macquarie Street,
Sydney, New South Wales**

On Thursday, 2 March 2023 at 10.30am

(Day 31)

Mr Peter Gray SC	(Senior Counsel Assisting)
Ms Meg O'Brien	(Counsel Assisting)
Mr Enzo Camporeale	(Director Legal)
Ms Caitlin Healey-Nash	(Senior Solicitor)

Also Present:

**Mr Mark Tedeschi KC with Mr Anders Mykkeltvedt and
Ms Amber Richards for NSW Police**

1 THE COMMISSIONER: Yes, Dr Dalton, would you be kind
2 enough to just come back into the witness box, thank you
3 very much.

4
5 <DEREK DALTON, on former oath: [10.34am]

6
7 <EXAMINATION BY MR TEDESCHI:

8
9 MR TEDESCHI: Q. Dr Dalton, you were asked a number of
10 questions by Counsel Assisting concerning your work,
11 together with Professor de Lint and Dr Tyson, in relation
12 to the academic exercise that you engaged in as part of
13 Strike Force Parrabell. Would you tell the Commissioner
14 what you understood to have been Assistant Commissioner
15 Crandell's overall objective in Strike Force Parrabell, as
16 you understood it?

17 A. Sure. I think his objective was to take the 88 cases
18 that there had been so much consternation and concern about
19 by the gay community and the wider community, hold them to
20 a level of scrutiny and review to try to determine how many
21 of them were, indeed, gay hate bias crimes, and in doing
22 so, if not recalibrate, but calibrate afresh, according to
23 that information, just what the state of play was.

24
25 And to do so, I think he was trying to engage with all
26 their concern and all that long and complicated history of
27 sadness and concern and anguish that kind of cluster round
28 deaths and homicides, which cause concern in society.

29
30 Q. And from your perspective, did that change at all
31 during the course of your contact with the police strike
32 force?

33 A. No, never, not at all.

34
35 Q. And to your view, the final report, both the police
36 part and your part, did that address what his objectives
37 had been during the course of that inquiry?

38 A. Yes, certainly, it did. I see that in producing the
39 results that we did, which you'd have to say in some
40 senses, you know, a certain amount of indeterminate cases,
41 a certain amount found as bias, et cetera, they were
42 different clearly to the number of 88 but it went a long
43 way to producing perhaps a clearer or more accurate view of
44 what the state of play had been in terms of the totality.

45
46 Q. Do you think he had a preconceived notion about how
47 many of the 88 were genuine gay hate crimes or --

1 A. No, not at all. I recall in the broadest brush
2 strokes some sort of conversation earlier where he sort of
3 instilled in me - these weren't his terms but it was like
4 the logic was "There is to be no fear or favour. You find
5 what you find". There was no - I felt no sense of pressure
6 from the outset of "It would be really good if you could
7 kind of concord with us"; despite suggestions that were put
8 to me yesterday, I felt no such pressure, no such
9 inducement or encouragement.

10
11 Q. I will come afterwards to ask you about consensus and
12 collaboration.

13 A. Mmm-hmm.

14
15 Q. But before we get to that, you were asked a number of
16 questions by Counsel Assisting about references in both the
17 tender request and your tender document to independence -
18 your independence.

19 A. Mmm-hmm.

20
21 Q. Why did you think that was of importance and what did
22 you have to add to that that perhaps others didn't have?

23 A. Yeah, I - I - I came up with the idea of independence
24 fairly quickly. It was based on the logic that it seemed
25 to me that, in the State of New South Wales, there was
26 a long, complicated history, a history I only knew from
27 afar, I didn't know intimately, of kind of distrust,
28 animosity between the NSW Police and the "gay community",
29 and perhaps even the wider community, and that different
30 parties had criticised each other in various forums, and
31 I saw that coming from South Australia, we were independent
32 in the sense that we were from a different jurisdiction and
33 we hadn't been embroiled in these kind of messy and nasty
34 murky sort of histories that perhaps could have precluded
35 a sense of independence or of fair mindedness.

36
37 Q. What about in terms of your background at that time,
38 like, at the time that you were awarded the tender, was
39 your academic background in the area of conflict between
40 the police and the LGBTIQ community?

41 A. Absolutely. Certainly quite a few of my articles had
42 explored - some, admittedly, from a historical point of
43 view, so way back even in terms of the 1920s, '30s and '40s.
44 I had explored in one article, for example, practices where
45 NSW Police officers would entrap gay men at beats in plain
46 clothes by masturbating at a public toilet, et cetera,
47 trying to draw the attention of a homosexual man, then

1 pulling out a police badge and arresting them.

2
3 I had explored in terms of a social and legal studies
4 article that - I call it Wolfenden, but it's kind of too
5 grandiose a term for what we had in Australia but it was
6 a version of the Wolfenden report, but I would have thought
7 anyone scrutinising my back catalogue, if you would like to
8 call it that, would have said that I was very critical of
9 the police and of criminal justice institutions towards -
10 that I was, yeah, very critical of them. I would document
11 their subtle and not so subtle acts of violence in terms of
12 constructing gay men as perverted, deviant subjects who
13 were requiring, both pre decriminalisation and post
14 decriminalisation, very harsh treatment.

15
16 Q. So you think the objective observer would, if
17 anything, have viewed you as being anti-police rather than
18 anti-gay?

19 A. I would have thought so but - yeah .

20
21 Q. Assistant Commissioner Crandell was asked a number of
22 questions about whether or not he wanted to include members
23 of the LGBTIQ community in the team?

24 A. Mmm-hmm.

25
26 Q. What was your background in that regard?

27 A. Well, I'm - I'm a gay man. I - that was - it seemed
28 to be well known at Flinders University, although some
29 students used to say to me, "You don't look gay" and they
30 would make sort of jokes about it, perhaps because I didn't
31 fit some sort of stereotype.

32
33 I was a Gay and Lesbian Liaison Officer for a short
34 period of time to assist those sort of gay and lesbian
35 students at Flinders. I have had as a gay man much less
36 contact with the lesbian community obviously but I'm very
37 sympathetic to trans and lesbian concerns.

38
39 Perhaps the most - the second most offensive thing
40 that has ever been put to me in my life was that line in
41 Nicole Asquith's report, that I - something about trans
42 violence, that I had neglected some discussion of trans
43 violence.

44
45 THE COMMISSIONER: Q. Sorry, I just couldn't hear that
46 because of the noise outside. What was the word that she
47 put in her paper, was it, or something --

1 A. It was something about that we had - it was something
2 about - I don't remember the precise terms.

3
4 MR TEDESCHI: Q. I think you said neglected trans
5 violence?

6 A. Yeah, neglected trans violence. If I could elaborate
7 ever so slightly, the problem of trans violence is a very
8 serious problem and it's one that's very concerning and
9 upsetting but there wasn't a lot of that in the Parrabell
10 cases, for all sorts of complicated reasons, that was
11 discernible.

12
13 It might have been - I'm ever so horrified that
14 I might not have put in a little paragraph to acknowledge
15 that, but to the extent that - I thought it was implicit,
16 but to the extent I left it out, to have been subject to
17 that sort of accusation - and you can go back, you've got
18 the document yourself, you produced it.

19
20 Q. That's hurtful to you --

21 A. Sorry?

22
23 Q. That's hurtful to you, that sort of accusation --

24 A. Profoundly. Profoundly hurtful.

25
26 Q. Did Assistant --

27
28 THE COMMISSIONER: I'm sorry, I don't know whether
29 Dr Dalton had finished his answer to your question.

30
31 MR TEDESCHI: I'm sorry.

32
33 THE COMMISSIONER: Q. Please go on.
34 A. I think in essence I had. As I said, I can't - I now
35 work for a different - I don't work for the university
36 anymore, I work 40 hours a week, I have all sorts of other
37 things to do. I didn't have time to read the report in any
38 detail but when I did, around Christmas time, note that
39 point, it kind of stopped me in my steps, I jarred and
40 went, "Whoa, where's that coming from?" It just - it was
41 so heavy handed.

42
43 MR TEDESCHI: Q. All right. Did then Superintendent
44 Crandell ever ask you whether or not you were a member of
45 the gay community?

46 A. I don't recall that he did, to be honest. I don't --
47

1 Q. Did it appear that it was irrelevant to him?
2 A. Yeah, it's so tricky, because, you know, with the
3 presumption of heterosexuality that seems to dominate
4 society, we all operate under that model, and some people
5 who are gay in certain contexts will go out of their way to
6 make it known or might presume that it gets known. It's
7 one of those things that is hard to kind of get a read on.
8 I certainly don't recall being asked. Did I volunteer
9 anything to that effect? I can't remember.
10
11 Q. In your tender document, you included references to
12 a lot of your previous articles about the gay community?
13 A. Mmm-hmm, yes.
14
15 Q. So it would have been obvious to anybody reading your
16 tender document.
17
18 THE COMMISSIONER: I'm not quite sure whether that's
19 a question or whether you are giving evidence from the Bar
20 table.
21
22 MR TEDESCHI: I will withdraw it, sorry, you are quite
23 right.
24
25 THE COMMISSIONER: It sounds a little bit like evidence
26 from the Bar table.
27
28 MR TEDESCHI: You're quite right, I'll rephrase.
29
30 MR TEDESCHI: Perhaps - if you would like me to swear you
31 or affirm you, Mr Tedeschi, I can't wait, I can assure you.
32 But unless and until that happens, maybe ask the odd
33 question rather than make the odd speech or statement,
34 thank you.
35
36 MR TEDESCHI: You're quite right. Thank you,
37 Commissioner.
38
39 Q. Dr Dalton, in your view, would it have been obvious to
40 anybody reading your tender document that your previous
41 academic experience and interests had been largely
42 concerning the gay community?
43 A. I would have thought so, yes.
44
45 THE COMMISSIONER: Q. What about your book on Nazi
46 tourism, for example?
47 A. Well, academics have many different areas of

1 expertise.

2

3 Q. No, no, I'm sure they do, but the question was
4 I thought, and I may have misheard it. If what was put to
5 you, that some of your academic writings were in the field,
6 then I perfectly understand that. But I am familiar with
7 other of your writings including the book that you drew
8 Commissioner Crandell's attention to, which was Nazi
9 tourism sites, I think. So you obviously have interests
10 outside the LGBTIQ community, clearly?

11 A. Yes, I do. That's very fair to say. As do lots of
12 other academics.

13

14 THE COMMISSIONER: Thank you.

15

16 MR TEDESCHI: Q. All right. Now, it was suggested to
17 you by Counsel Assisting - right towards the end of your
18 evidence yesterday, you were asked by him whether it would
19 be reasonable to categorise you as an apologist for the
20 NSW Police?

21 A. Mmm-hmm.

22

23 Q. Now, you gave evidence that that had been suggested by
24 Professor Asquith and that you found that offensive.

25

26 THE COMMISSIONER: Look, I don't want to be wasting time
27 unnecessarily, but I don't think that's right, Mr Tedeschi.
28 You may be absolutely right but I can't remember --

29

30 MR TEDESCHI: I will withdraw the question in that form.
31 It has --

32

33 THE COMMISSIONER: Pardon me for interrupting you, I am
34 sorry. Certainly Mr Gray suggested it, but I don't think
35 he attributed to anybody but himself.

36

37 MR TEDESCHI: Q. Mr Gray asked you whether, in fact, it
38 would be fair to make that --

39

40 MR GRAY: With respect, I object to that. That wasn't the
41 question either.

42

43 THE COMMISSIONER: I'm happy - I'm absolutely happy to go
44 to the transcript, not because I have, but I'm content if
45 you wish to put accurately what it was that was put to
46 Dr Dalton. I do recall the question but I don't recall the
47 precise content 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

MR TEDESCHI: I will get the actual transcript.

THE COMMISSIONER: I have it here. I will see if I can find it for you. Yes. Mr Tedeschi, I think it is at page 2557, or thereabouts. If you read from the top of that page, you'll see the context in which it was put. And if you would like a hard copy, I can hand it down to you, if you would prefer that.

MR TEDESCHI: Thank you. We don't have one.

THE COMMISSIONER: All right. Whether those on the other side can check - and if you want the witness to have the hard copy, I can obviously show him. But by all means, do that, whatever you wish to do.

MR TEDESCHI: Q. You were asked by Counsel Assisting:

Q. In your long answer at the close of the hearing yesterday, you said that you were "not a police apologist".

A. No, I'm not.

Q. Now, would you agree that in this article --

and I take it that Mr Gray was referring to the article by you and Professor de Lint --

as it is written, with you put forward as one of its two authors, the authors would appear to be, indeed, police apologists?

A. No, despite everything I've said, I still wouldn't agree with that.

Now, in your view, what approach would a true police apologist have taken to the exercise that you were engaged in as part of the Flinders University team?

A. I guess the easiest thing a true apologist would have done would have been to endorse their instrument, told them "That's a spectacular thing. It's come from the FBI, they use it at Quantico. It's wonderful. Good stuff, it's from America, America always has the best stuff", correlate the results in close - in profound proximity to their results so that they almost matched identically, left out a whole lot of sentiment in the report about anti-police, this that

1 and the other, and written something that was much more
2 favourable. I mean, it's - because I'm not a police
3 apologist, I'm finding it hard to kind of imagine. But I
4 imagine they're the things that they would have done,
5 I guess.

6
7 Q. In your part of the report you basically stated that
8 the BCI form was an inadequate basis to conduct that
9 exercise?

10 A. Yes.

11
12 Q. What do you say about that and the question about
13 whether or not you're a police apologist?

14 A. Sorry, can you put that to me again, sorry?

15
16 Q. In your report you strongly criticised the BCI form?
17 A. Yes.

18
19 Q. You said that it had no academic basis and you
20 identified a number of serious problems with it, going to
21 the very root of the exercise that the police had engaged
22 in. What do you say about that approach by you and the
23 suggestion that - the question whether you're a police
24 apologist?

25 A. Yeah, I - the police apologist wouldn't have done
26 that. It's just like they just would have - they
27 wouldn't have - it's - they would have kind of papered over
28 the cracks of the deficiency of that instrument and
29 endorsed it and gone on their merry way and had a lot
30 easier role in terms of doing the review.

31
32 Q. Now, you were asked a number of questions by Counsel
33 Assisting about collaboration --

34 A. Mmm-hmm.

35
36 Q. -- that being a term that was in the tender document
37 issued by the police and an issue also raised in your
38 tender for the job. You were asked a lot of questions
39 about that and also about consensus, about reaching
40 consensus?

41 A. Yes, I recall.

42
43 Q. Could you tell us how you went about the exercise of
44 collaboration and when you were able to reach consensus,
45 what the exercise entailed from your point of view?

46 A. I have a pretty patchy memory of the details. But
47 I thought yesterday, when they were discussing it - well,

1 let's forget about that, let's just - I'll stick to what
2 I seem to remember. My memory seems to be that when we did
3 get together with the police in that final meeting, we went
4 through the cases one by one. It took a long time. But
5 the process was more about them saying, "We did this with
6 our instrument. We took into account all these factors",
7 blah, blah, blah, blah, blah, and then we would say, "With
8 our instrument we took into account all these sort of
9 complicated factors", blah, blah, blah, and then both
10 parties, having listened to each other, would maybe make
11 a change or feel more steadfast about what they had already
12 done.

13
14 But it wasn't as though anyone was kind of chalking -
15 it was more that it was about the discussion and the tenor
16 of the logic and the language and all the attributes,
17 rather than any sort of discussion of crude agreement of -
18 because, of course, we had different categories.

19
20 Q. Did it appear to you that each side was learning from
21 the other, bringing a different --

22 A. Yeah, absolutely. It was quite --

23
24 Q. -- foundation of knowledge and experience?

25 A. Yeah, it was quite fascinating. And much in the same
26 way that in the earlier process when we'd done the
27 concordance, the three of us, Professor de Lint, Dr Tyson
28 and I, that was also fascinating because things that one
29 might have overlooked would come to light or things that
30 one thought was less or more important, appeared less or
31 more important in the discussion, I guess this was all the
32 more important often in the cases where there was
33 a profound paucity of detail.

34
35 Q. So the more paucity of detail, the harder the task
36 was?

37 A. Absolutely, for everybody.

38
39 THE COMMISSIONER: Q. May I just ask this: what did you
40 learn from the police?

41 A. Pardon, Commissioner?

42
43 Q. What did you learn from the police?

44 A. I don't - I don't recall. I remember thinking that
45 I had gleaned an insight into some things.

46
47 Q. Gleaned an insight into something?

1 A. Into things, yeah, but I don't --

2

3 THE COMMISSIONER: Yes, thank you, Doctor.

4

5 MR TEDESCHI: Q. Was that because they had investigative
6 experience and you didn't?

7 A. I guess so. I mean, I never professed and, remember -
8 that - that I was an investigator or anyone who is a
9 criminologist could bring that to the table. And that's
10 why I remember when there was that early discussion, and it
11 was just being put on the table as an idea, about trying to
12 go through the murder - the cardboard boxes full of the
13 murder material and adduce how well they had been
14 scrutinised, et cetera. I immediately said, "No, no, no.
15 I can't do this." Because (a) I'm not a detective, I don't
16 have the experience, and of course, there was a nice phrase
17 used yesterday, that just - that kind of struck a chord
18 with me, you know, "by the standard of the day", and the
19 standard of the day when we're doing Parrabell was
20 different than, say, the standard in 1988, et cetera, when
21 then there was less computers and less this, that and the
22 other. So - because I remember saying to Assistant
23 Commissioner Crandell, "Gee, if you wanted to do that,
24 you'd have to go get a team of detectives from a different
25 jurisdiction" --

26

27 MR TEDESCHI: Q. If you wanted to do what?

28

29 THE COMMISSIONER: No, no, let him finish. I don't think
30 he had finished.

31

32 Q. Please go on, Dr Dalton.

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

But it immediately became apparent that, one, we

1 didn't have the skill to do it; two, we didn't have the
2 resources; three, we didn't have the time. We would have
3 been completely out of our depth.
4

5 MR TEDESCHI: Q. Whose idea was that?

6 A. I think - I think it was Assistant Commissioner
7 Crandell's idea. But I think - it's funny the things you
8 do or don't remember. I seem to recall that, as I started
9 to explain that to him, he had this look on his face like
10 "Of course, what was I thinking", and we moved past it
11 pretty quickly.
12

13 Q. So he was exploring the idea with you that your team
14 might be given, what, some random samples or a number of
15 samples of the boxes for you to look at the --

16 A. Certainly he said - certainly he said --
17

18 Q. -- source material?

19 A. I don't think he used the word "sample" but certainly
20 he said "some", some material. And I - when I saw the
21 volume or they mentioned the volume fairly early on, of
22 course, one would freak out, because it's like box upon box
23 upon box, and it's sort of --
24

25 Q. So you immediately rejected it because you said you
26 didn't have the skills and you didn't have the resources?

27 A. Yes.
28

29 Q. I think you mentioned another reason in answer to
30 questions by my learned friend, some - an analogy with
31 process line of making cars?

32 A. Yeah, the analogy of the process line of cars came to
33 me later, to be honest, when I reflected back on the task,
34 and I thought I was a bit clear about that yesterday, but
35 I guess to make the point again - and it had come to me at
36 the time, but not with the analogy perhaps, but I - I saw
37 it as - I saw that if the thing that you were trying to do
38 a quality control check on was consistent, like a BMW car
39 factory making one series of cars and they keep coming out
40 one after the other, you grab a car randomly and go, "Have
41 they screwed on the bolts properly? Did they do this, that
42 and the other?"
43

44 But I immediately realised with these distinct murder
45 cases or homicide - suspected homicide cases, they're all
46 profoundly unique. So to go to one box that was from one
47 period of time with different detectives, et cetera, and

1 work out whether that had been done well, and then to do
2 another five randomly, there was no way known you could
3 call it representative. It was - you just would have been
4 standing in quicksand, sinking.

5
6 Q. And in terms of the tone of your meetings with the
7 police in relation to collaboration and consensus, what can
8 you tell us about that?

9 A. I guess, if I'm honest, I went in - it was sort of
10 a weird dynamic because, as a gay man, I'd spent a lot of
11 my life, if I'm honest, being somewhat scared or fearful of
12 the police. It seems a weird thing to say, but that's the
13 truth. It's hard to explain why that was the case, but
14 I guess because for a long while I sort of thought the
15 police were anti-gay and that my sexuality targeted me to
16 get treated with a bit of hostility. So I was a little bit
17 nervous, if I'm honest. But the nervousness dissipated --

18
19 THE COMMISSIONER: Q. Doctor, I'm sorry, stop for
20 a moment. The noise level in this street is very high and
21 it's not that you're not speaking at the right level, but
22 I missed some of what you said. I do apologise. Would you
23 mind going back and telling us again what you just said, if
24 you can recall what you said? Thank you.

25 A. Yes, sure, and I can do it more succinctly having
26 just - so I guess I approached the initial meetings with
27 a bit of trepidation, because in the past, in terms of the
28 research I'd done, just my own sort of psychological
29 make-up, I was kind of a bit scared and intimidated by the
30 police, had had a couple of just negative interactions with
31 Victorian police officers years ago, just as a person.

32
33 And I thought - because often - it's hard to sort of -
34 I've got - I'm trying to be fulsome here. I tried to do
35 some research with the South Australian Police years ago,
36 and my colleague, Professor Mary Heath, had said, "You're
37 wasting your time", I said, "Why?" She said, "Because
38 they're so risk averse. You will go to the meetings, a lot
39 of the police will want to help you do the research.
40 You'll get months down the track and when the ethics
41 application form hits a certain level at the police
42 station, they're so - they don't want you discussing the
43 sensitive stuff; they will go 'Eh, this is too hard'.
44 They'll kind of pull up stumps and you won't be doing it".
45 Anyway, that's too much of a digression. So - sorry,
46 the --

1 MR TEDESCHI: Q. The tone?

2 A. The tone. I was shocked because immediately they were
3 so - I don't know why I should have been surprised, but
4 they were polite, deferential, very kind, very respectful
5 of me asking questions that - to try to understand all
6 sorts of aspects of police process that are quite opaque to
7 a person who is an outsider, even as a person who has
8 a lofty title like criminologist. You know, one could try
9 to gild the lily and go, "Oh, well, just because I'm
10 a criminologist, I know all this stuff". I don't think
11 that's true at all. I think you're quite often ignorant of
12 certain things and so it was important to ask a lot of
13 questions.

14
15 They were - they just - I remember particularly, was
16 it Detective or Sergeant, I can't remember his title, Paul
17 Grace. He was just a really gentle, kind, sweet man. He
18 was just really nice to deal with.

19
20 Q. Was there any attempt by them to apply any pressure to
21 you and your team to reach a consensus?

22 A. I know I'm under oath so it's important people
23 understand this, absolutely not. I - in fact, I recall at
24 one stage, Assistant Commissioner Crandell said to me, and
25 I'm - words to the effect of, and I'm not - I'm not saying
26 I'm quoting him, but it was - the tenor of what he said
27 was, "You are to - don't fear - don't fear any - any sort
28 of pressure or inducement or whatever. You are to find as
29 many cases in whatever category as you see fit." That was
30 kind of what he conveyed to me, and he said it at least
31 once and it felt genuine.

32
33 Q. Now, I know you've said that you don't remember any
34 individual cases and you don't have your notes anymore, but
35 do - is it your recollection that in fact, you ended up
36 having different approaches to some of the cases?

37 A. Oh, definitely.

38
39 Q. Do you remember now how many of them?

40 A. I mean, no doubt - in a way, it's funny in that you
41 write a report, you spend a year and a half on it, you're
42 intimately involved in it, and then with the passage of
43 time you read it, it's like you're an outsider to the thing
44 you did yourself. But - I don't know. Eight or so? Maybe
45 eight - eight or 10 maybe.

46
47 Q. What was the approach of the police in terms of their

1 tone and their attitude to having that number of matters
2 where there was disagreement between the police and the
3 academic team?

4 A. They didn't seem to care one iota. I mean, yesterday
5 I was asked a lot about - was it consensus? Was that the
6 term?

7
8 Q. Yes, consensus and collaboration you were asked about.

9 A. Yeah. And - and I've got to stress that - and, you
10 know, I - I'm not - you have captured all this data and
11 most of which I haven't seen for six years and it comes up
12 on the screen, I've got one second to look at it and
13 there's emails and there's stuff with - what was his name?
14 Craig?

15
16 Q. Middleton.

17 A. Middleton, yeah. He was a little bit more
18 intimidating than the others. He was - had a different
19 personality, he - and I know that there's all that talk,
20 but it wasn't about, "Oh, we've got to make sure we've got
21 'Insufficient Information' each and we've got to have
22 about 16 of this category"; it was never about the numbers.
23 It was about the tenor of the logic.

24
25 Q. Was there a genuine effort, on each side, to reach
26 a genuine opinion about the cases?

27 A. Absolutely.

28
29 Q. Now, you were asked some questions about Sergeant
30 Steer.

31 A. Yes.

32
33 Q. What was your perception of Sergeant Steer versus the
34 other police?

35 A. Oh, wow. He was the first - apart from Jacqueline
36 Braw, who I had the initial phone conversation with, when
37 I first went to Sydney, he was the police officer who
38 I spent the most time with, and I remember we were driving
39 around between Surry Hills and I think the big Parramatta
40 police complex.

41
42 And he took me to some of the infamous sites of some
43 of the terrible crimes, not, I must stress, let's be
44 careful here, not as some sort of visiting the scene, you
45 know, the crime scenes to gather any data or any such
46 nonsense but it was kind of a nice context to show me. And
47 in the car we had long conversations and I was asking him

1 all sorts of questions about all sorts of stuff, and he was
2 an incredibly passionate man. He seemed a very dedicated
3 sort of person.
4

5 But he was telling me sort of stuff, and it was really
6 difficult, I'd just got off the plane, I'm some academic
7 and he's kind of telling me stories that seemed to run to
8 the idea of in-house political sort of - "political" is not
9 the right word but in-house sort of disgruntlement about
10 the way bias crime was being handled, how many people were
11 assigned to the team, whether the team existed, what it was
12 doing.
13

14 He was quite - it seemed to me that he had already
15 all of a sudden become on the outer and that he was very
16 upset about it. I couldn't quite tell whether he deserved
17 to be on the outer or whether he was maligned as a person,
18 as people can be in an organisation, it was pretty hard to
19 tell.
20

21 Q. So during your contact with him, did he appear to be
22 upset or disgruntled or - or the like?

23 A. Yeah, and perhaps even angry, if that's the right
24 term. But very - got to stress, very, very helpful to me,
25 very - I was quite fond of the guy. I liked him.
26

27 Q. In your statement to this Inquiry, correct me if I'm
28 wrong but I think you said something like this, that you
29 had spent eight times more time on this job than what you
30 had actually quoted for?

31 A. Mmm-hmm.
32

33 Q. Have I got that right?

34 A. Yeah, it was - I know everyone's probably sitting here
35 thinking, "My God this guy's exaggerating", but I'm not
36 exaggerating, it was easily that.
37

38 Q. So why were you so passionate about this job?

39 A. Well, I --
40

41 THE COMMISSIONER: I'm sorry, I'm sorry, it doesn't
42 follow.
43

44 Q. Did you spend eight times more on the job, perhaps
45 open-ended, because you were passionate or because you
46 grossly underquoted, underestimated the amount of time that
47 you thought it would take?

1 A. That's a fair question.
2
3 Q. Well, that's why I'm trying to put it to you, rather
4 than putting the answer in your mouth. But why don't you
5 answer the alternatives and then Mr Tedeschi can take up
6 his theme?
7 A. Sure. I think it's a case of two things, and I think
8 that's a fair way to put it. I - I think we were initially
9 told crudely what the magic amount was that the tender
10 would be, and interestingly, you know, that's all on record
11 at the university, I remember having this discussion with
12 Narmon Tulsi, and he got out some official --
13
14 Q. Sorry, who was that?
15 A. Narmon Tulsi was an employee at Flinders University
16 employed to help people in my criminology department write
17 tenders.
18
19 Q. Yes.
20 A. He got out this document that had official charge
21 rates on it for time either on the hour or the day based on
22 one's academic status, so Professor, Associate Professor,
23 et cetera. And after we crunched all the numbers in terms
24 of what the - following the tender process, he said to me -
25 made some joke and he said - I will never forget it because
26 it was quite a weird statistic. He said, "You are charging
27 yourself out at a 67 per cent discount." I said, "Oh, that
28 seems a bit weird". He said, "Oh, that's just how it goes,
29 you know, because the commercial reality is no-one will pay
30 the rate." And I said, "Is the rate so grossly inflated?"
31 He said, "No, not", dare I say it - this is what he did
32 say - "not according to what some professionals like
33 doctors or lawyers charge", and he meant medical doctors.
34
35 MR TEDESCHI: Q. Could I bring you back to the
36 question --
37
38 THE COMMISSIONER: No, I'm going to let him finish,
39 Mr Tedeschi, because I know you want to stop him and go
40 on --
41
42 MR TEDESCHI: No, I don't want to stop him --
43
44 THE COMMISSIONER: No, no, I'm not assuming that --
45
46 MR TEDESCHI: I want him to answer your question.
47

1 THE COMMISSIONER: Yes. I'm happy for him to continue in
2 this dialogue. It's his evidence and his time.

3
4 Q. Please go on, Dr Dalton.

5 A. I said "Okay", so, sort of, be it. And so from the
6 outset, that was sort of I guess a financial or a time
7 parameter, but it's certainly true to say that once we got
8 involved in the activity, it became apparent that to do
9 a really thorough job, and I was really passionate about
10 trying to do the best job humanly possible, that infinitely
11 more time and resources would be required.

12
13 And certainly some of it, to be fair, would be because
14 you're just having to read a lot more literature on a whole
15 lot of stuff that you hadn't read before and be as thorough
16 as you could, and sometimes once you dive into this stuff,
17 like a PhD student finds doing their - you know, it's just
18 a lot to read.

19
20 And so - and I remember even one colleague,
21 Professor Mark Halsey, who had done many a tender, sort of,
22 said to me, "Oh, well, you just - you let the money dictate
23 what you do and then you kind of just bring it to an abrupt
24 halt and cobble it together as best you can." And I sort
25 of said to him words to the effect of "Can't do that here.
26 It's just - can't do it."

27
28 So I then, as a result of that, I guess, found
29 myself - because the tender activities for any person
30 tendering at the university were meant to sit as an outlier
31 to delivering lectures, marking essays, all the stuff -
32 I don't want to read out the list. It was meant to sort of
33 sit as an outlier.

34
35 So the consequence of that - and I was a bit fortunate
36 at the time because I had bought out of, I think, some
37 teaching, and the teaching I was doing I'd done for a few
38 years so I was familiar with it. So I'm not saying
39 I didn't have enough time to do the task, by any stretch of
40 the imagination, but the task became - and even I think the
41 police acknowledged that. You know, these tender
42 documents, initially, they're abstract concepts with
43 bullets points and you do this and you do that and then
44 there is the reality of the "doing". I don't - I think
45 I have said enough and I'm saying too much.

46
47 THE COMMISSIONER: Over to you, Mr Tedeschi.

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

MR TEDESCHI: Q. The Commissioner's question was did you underquote or were you passionate or was it both?

A. Didn't - I didn't underquote because - well, the - but it was clear - it was made really apparent, "This is the amount of money and this is the thing that you've got to do for it." In good faith, with a lot of pressure, I think I must have thought initially, "Oh, the task is sort of doable for that", and when you look at it, on the face of it, too, but, you know, the way the money gets put out, et cetera, it is not a lot of money. But I think more - what I'd really say was I was just really passionate about it. It became a passion project.

Q. What were you particularly passionate about? What drove you?

A. It's hard not to get emotional talking about it, but --

THE COMMISSIONER: Q. Doctor, would you like a break?

A. No, no, I'm okay.

Q. All right.

A. The files - these were - these were just people who had met with terrible deaths, perhaps not necessarily homicide, but a death nevertheless in every case, often in horrific circumstances, with horrendous violence.

You can only imagine in some of the cases like Tonks, et cetera, that - the stuff you had to read, it's terrible. You never forget it. Extreme violence, extreme hatred and animosity. And so in reading this stuff, you're just wanting - it's not - you know, it's even different to my Holocaust research where, of course, you're trying to honour the dead in the Holocaust and they're not comparable, but you're just trying - with each case, you turn the folder and it's weird, you just turn the folder and there's another one.

And some of them they were short, but they were no less horrific for being short, and some of them were long, and every - I'm an atheist but every day I thank God that we didn't get the Scott Johnson stuff to read because it went off to the Coroner, because that would have been even worse, particularly because of the volume of information.

And so I felt the - I'm not saying it as some sort of

1 flippant throwaway line, I felt the weight of the dead on
2 my shoulders every day I did this task. And, you know,
3 I was just doing the best I could with an imperfect
4 instrument in a busy life with other academic activities.
5 I don't quite understand the animosity of this process.
6

7 Q. Are you sure you wouldn't like a break?

8 A. It's okay.
9

10 Q. Doctor, are you sure you wouldn't like a break?

11 A. No, I'm okay. I'm okay.
12

13 THE COMMISSIONER: All right. Yes, please go on,
14 Mr Tedeschi.
15

16 MR TEDESCHI: Q. Dr Dalton, you were asked some
17 questions --
18

19 THE COMMISSIONER: Before you perhaps pick up the thread.
20

21 Q. Did I hear you a few moments ago, before you answered
22 the last question or two - and correct me if I've misheard
23 you - to say that you approached the task with some
24 trepidation?

25 A. Yes.
26

27 Q. All right. Now, in your opening letter to Ms Braw of
28 28 July, in the middle of that letter, you said:
29

30 *Professor Willem de Lint, Dr Danielle Tyson*
31 *and I are excited about the opportunity to*
32 *assist you with a collaborative assessment.*
33

34 I take it that was a candid and true statement on your
35 part?

36 A. Yes.
37

38 Q. And that correctly formulates the view of - not only
39 your own but, as best you understood it, Dr de Lint and
40 Dr Tyson; you regarded this as an exciting academic
41 opportunity?

42 A. Yeah, but you make "exciting" sound sort of
43 pejorative.
44

45 Q. No, I'm not making it sound anything. I'm actually
46 using your terminology.

47 A. Okay.

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 all I'm asking you is was that letter truthful or was it simply done to embellish the position so as to enhance your prospect in the tender? That's all I'm asking?

A. I don't know how to even answer it. I --

Q. Well, try answering it as best you can. Was it candid and truthful or was it part of the embellishment exercise to hopefully get the tender?

A. I can honestly say I don't know.

THE COMMISSIONER: Okay, that's fine, thank you.

Yes, Mr Tedeschi.

MR TEDESCHI: Q. Did you have any excitement at getting the tender?

A. Yes.

Q. Why?

A. I guess I thought it's going to be interesting to work with the police. And I saw the excitement as about academic curiosity where you can actually get in, explore a phenomenon and hopefully shine some sort of light on it that might be helpful for everybody. I think I might have been naive, though, because as I said, once the homicide folders arrived - perhaps the sense of academic curiosity and excitement was replaced by the dread, some days, of having to turn the pages yet again and to revisit them yet again and to have the horrific contents.

Q. Did you also have trepidation about this job?

A. Yes.

Q. Why?

A. And I don't mind admitting it, because - well, I think there's two types of academics out there in the world, crudely speaking, those who kind of bang their fist on the table and go, "I'm wonderful, I'm the best thing since sliced bread and everything I do is spectacular and isn't it wonderful that the world has me in it." I'm more of a kind of reserved person. I remember even when I used to go for promotion at the university, and I got promoted several times which was from lecturer to senior lecturer from senior lecturer to associate professor - I'd have people scrutinising my promotion document and they'd say,

1 "Oh, you're not selling yourself well. You've got all of
2 these amazing achievements and you're kind of really
3 humble and you've got go, 'No, I'm this and I'm that'", and
4 I found the task of putting those documents together quite
5 difficult. And I've forgotten your question, sorry.

6
7 THE COMMISSIONER: Let me interrupt, Mr Tedeschi, and ask
8 another one.

9
10 Q. You said a moment ago you thought you might have been
11 a little naive, but surely in advance of this project, you
12 must plainly have understood that what you were going to be
13 doing was looking into the homicides or potential homicides
14 of a very large number of people?

15 A. Mmm-hmm.

16
17 Q. And is that something you'd never done before?

18 A. No, I had never looked at - no, I hadn't. That would
19 be fair to say.

20
21 Q. And more to the point, you'd never looked at, in the
22 context of gay hate or possible gay hate homicides?

23 A. No, that - that would be fair to say.

24
25 Q. All right. And is that one of the reasons why you
26 regarded yourself perhaps later, given your background and
27 given your own sexuality, that you may have bitten off more
28 than you could chew?

29 A. Well, biting off more than one can chew is an
30 interesting phrase, and I think as an - well, I can only
31 speak for myself, as an academic, who also had all those
32 other tasks I've mentioned to do before, this task, because
33 of its profound importance and the gravity of the material,
34 et cetera, it wasn't so much that I had bitten off more
35 than I could chew, but that the toll of doing it was
36 personally pretty onerous.

37
38 THE COMMISSIONER: Thank you.

39
40 MR TEDESCHI: Q. You were asked some questions by
41 Counsel Assisting about where the money went to, and
42 I think you said it went to a particular account or fund at
43 the university?

44 A. Yeah, it was called a - what was the term they used?
45 They - a research account or something like that. They had
46 some strange nomenclature for it.

47

1 Q. Was that a fund that was available for purposes such
2 as attendance at conferences, research work and the like?
3 A. Yeah, the chief categories, and certainly the
4 categories I used, were - most people would have gone to
5 conferences. I'm not mad on going to conferences. I spent
6 many thousands of dollars paying a copy editor to copy edit
7 my book. I bought some - it will sound rather strange,
8 I bought a very expensive volume of comics, because I was
9 teaching a popular culture topic and I wanted to explore
10 the representation in this comic, it's kind of a new field.
11 I think a lot of the money was sitting there - a lot --
12
13 Q. Was it used for academic purposes?
14 A. Absolutely, yeah. And I think sometimes they'd let me
15 pay, maybe, for some teaching relief, but you could have
16 also, if you so desired, bought things like laptop
17 computers, I think, but I didn't want a laptop.
18
19 Q. All right. I have asked you some questions about
20 consensus and collaboration. Counsel Assisting asked you
21 a number of questions about the BCI form?
22 A. Mmm-hmm.
23
24 Q. Firstly, he pointed out that there were two forms and
25 you said you were unaware of that?
26 A. Yes.
27
28 Q. The other thing that he drew to your attention is that
29 on the BCI form --
30
31 THE COMMISSIONER: Which one?
32
33 MR TEDESCHI: Q. On both of them, that the first
34 category, "Establishment of a Bias Crime", had the words
35 "beyond reasonable doubt".
36
37 MR GRAY: I object. That is precisely what I did not say.
38
39 THE COMMISSIONER: That is precisely erroneous, and the
40 problem, Mr Tedeschi, is we've all been together now for a
41 little while, but the point of the story, as I understand
42 it - Mr Gray will correct me - is that the form or the
43 questions posed were different pre and post June 2016.
44
45 MR TEDESCHI: I accept that.
46
47 THE COMMISSIONER: The first two categories of "beyond

1 reasonable doubt" were only inserted post June 2016.

2

3 MR TEDESCHI: I accept that.

4

5 THE COMMISSIONER: And Mr Crandell gave quite a bit of
6 evidence about his knowledge or, may I say, his lack of
7 knowledge of that, and if I may just go a step further --

8

9 MR TEDESCHI: My question was in error. I accept that.

10

11 THE COMMISSIONER: No, no. All right.

12

13 MR TEDESCHI: Q. Dr Dalton, you were asked some
14 questions about one of the BCI forms which contained, in
15 the first category, the requirement for beyond a reasonable
16 doubt. You describe in your report the tool that you and
17 Professor de Lint and Dr Tyson used, which didn't have that
18 term in it at all. You used instead a proactive/reactive
19 category, and some other categories?

20

21

22 Q. How were you able to come to any sort of consensus or
23 collaboration if the police had "beyond a reasonable doubt"
24 as one of their categories for inclusion of a crime as
25 a bias crime, whereas yours didn't?

26

27 A. Yeah, it's hard to answer, but I suspect that - the
28 weirdest thing is even though that phrase was in their
29 tool, I - I can't help but wondering whether they
30 steadfastly obsessed over "beyond reasonable doubt" in
31 terms of assessing the cases. Because remember they did
32 say they were assessing them, as well, in relation to the
33 narratives in the case summaries as well, so - I guess one
34 way, another way of looking at it would be that even though
35 we had different instruments, the phrases - or "tools"
36 might be a nicer phrase - that they were ostensibly doing
37 a very similar thing, albeit I know we had - we - with the
38 anti-paedophile - the sub-category of anti-paedophile bias,
39 we were disaggregating a bit differently. That's about as
40 best - I don't really know what else to say.

41

42 Q. Can I ask you this: did it appear to you, during your
43 discussions with the police, that they were strictly
44 adhering to a requirement of proof beyond a reasonable
45 doubt, for inclusion in that first category?

46

47 A. I think no because I never - I don't recall that
48 phrase ever coming up in the discussions right at the end.
49 But it might have. I just --

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

THE COMMISSIONER: Q. But the reality, Doctor, is if it never came up for discussion, you would have no way of knowing how or which form they applied to which case at which time; isn't that right?

A. Correct. Correct, yep.

THE COMMISSIONER: Thank you.

MR TEDESCHI: Q. You've been asked lots of questions by Counsel Assisting about the different tools available at different times. In your report you pointed out that the BCI form was one of the few forms that had received any sort of academic attention or any sort of acceptance generally at that time; correct?

A. Yes.

Q. You, of course - you express in your report your concerns about the BCI form. Are you aware now if there is any general consensus as to whether there is a form that is generally accepted around the world as being suitable or accurate or appropriate for the assessment of bias crimes?

A. I'm not, and I have to qualify it by saying, you know, once Parrabell was over and the academic article came out, my attentions - my academic interests returned to trying to plan my dark tourism Holocaust research.

And so with Parrabell being over, I put that aside, as one does if one's got different research interests, I put it aside for a moment. And then with leaving the university and a new life, I haven't - and also, I don't have access to these rather rich wonderful database search engines anymore. I do have access to Google Scholar. The problem with Google Scholar is, you know, once you've found the thing you want, you press on the button and you sometimes hit a paywall. So I haven't had the time or the energy or indeed the inclination to check. But I also don't know of one just as a matter of course.

Q. You've been provided with the reports of Dr Asquith, Dr Lovegrove and Ms Coakley?

A. Mmm-hmm.

Q. From your review of those reports, does it appear that there is a universally accepted tool?

A. I'll readily admit, as I think I have already said I have only cursorily read those reports, "skim-read" them

1 might be more accurate phrase. But even in doing that, it
2 seemed - I just kept thinking, well, our instrument has
3 been criticised, perhaps in a way for fairly good reasons.
4 It was the best we could come up with. But I keep
5 wondering, well, where is the wonderful magic robust
6 reliable tested instrument? And I don't think it exists,
7 to the best of my knowledge.

8
9 Q. In the field of criminology or social science
10 generally, are approaches to most topics subjective rather
11 than objective?

12 A. You'd have to say they're subjective. And the
13 interesting thing is, of course, social scientists,
14 criminologists, we invent instruments or tools. Because
15 it's social science - you know, if it's a medical test
16 often you run the medical test and there's the result and
17 it's not really - there can be interpretation, of course,
18 with medical data, but with social science, I think,
19 irrespective of the instrument or the tool you're using,
20 the subjectivity does come into play, absolutely. And
21 I would challenge - I would say for their instruments and
22 things as well.

23
24 Q. Going to Dr Asquith's report, she describes in her own
25 words an objective approach and a subjective approach. She
26 describes the objective approach being the approach of
27 looking at all of the facts and circumstances in a
28 particular case to determine whether a gay hate bias crime
29 has been committed.

30
31 THE COMMISSIONER: Can I just interrupt you for one
32 moment? Are you putting this by way of an assumption?

33
34 MR TEDESCHI: Yes.

35
36 THE COMMISSIONER: To a man who skim-read the report?

37
38 MR TEDESCHI: Yes, I would like to do that.

39
40 THE COMMISSIONER: Okay, if it is by way of assumption --

41
42 MR TEDESCHI: Q. Would you assume that that's what she
43 describes as being the objective approach, and she
44 describes a subjective approach as being to assess whether
45 or not a gay hate crime has been committed by interrogating
46 the victim?

47 A. Yeah, and certainly I did discuss the reports with

1 Professor de Lint and, yeah, I think that's - my
2 recollection is that's pretty well it.

3

4 Q. In her report, correct me if I'm wrong, she prefers
5 what she calls the subjective approach rather than the
6 objective approach?

7 A. Yeah, which I gather from what I did take from it kind
8 of segues to that English approach of asking the victim.
9 And I can see in terms of the English approach,
10 particularly for assaults and other, if we were to call
11 them lower-level, less serious crimes, it's a good
12 approach. And if you tether your instrument to that,
13 I guess it's easily verifiable, if that's what - you ask
14 the victim and - pretty easy. But it strikes me that it
15 would lead to I guess what you would call inaccuracies,
16 because you just - you're at the whim of what - asking the
17 victim what they think. I wish I could say more but I --

18

19 Q. Is it appropriate for homicides?

20 A. I would have thought not.

21

22 Q. You don't have a victim to ask their view?

23 A. That's right.

24

25 Q. So it's not available at all in homicides, is it?

26 A. No, no at all, that's right.

27

28 Q. Some sections of an article by Professor Gruenewald
29 were also brought to your attention?

30 A. Mmm-hmm.

31

32 Q. Do you recall that yesterday - by Counsel Assisting?

33 A. Yes, I do.

34

35 Q. Now, it would appear from the parts of the article
36 that were drawn to your attention by Counsel Assisting that
37 what Counsel Assisting was suggesting you would take from
38 that article is that there is an objective, repeatable tool
39 that can be used merely by assessing whether the victim is
40 a member of the LGBTIQ community. Is that the way you
41 understood the sections --

42

43 THE COMMISSIONER: Well, I don't think that's an accurate
44 portrayal but I will allow it on the basis that it is his
45 understanding. If that turns out to be a misunderstanding
46 of the article, so be it, but certainly on the basis of
47 Dr Dalton's understanding I will allow you to ask that.

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

MR TEDESCHI: Q. You haven't read the full article, have you?

A. No.

Q. You've only had an opportunity to briefly skim the parts that were put to you by Counsel Assisting?

A. Yes.

Q. Is that the way that you understood what Counsel Assisting was putting to you, that there is a simple, clear, repeatable objective --

THE COMMISSIONER: None of those words were used in order to describe what was put, Mr Tedeschi. You've got a witness who hasn't read the article and in the conference or conferences you've had with him since yesterday afternoon, presumably you haven't invited him to read it either, from the tone and the content of your questions. So may I ask the point of this?

MR TEDESCHI: Sorry, what the point is?

THE COMMISSIONER: The point of asking him, when he hasn't read the article, and you're asking him about an understanding using terminology which, as far as I can recall, was not used by Counsel Assisting to characterise the article.

MR TEDESCHI: Might I rephrase the question.

THE COMMISSIONER: No, why don't you use the transcript. If the transcript is available to you - if it is not, of course - but if it's available, then maybe put the question that was put and ask Dr Dalton to refresh his recollection from what was actually said rather than yours or, for that matter, my recollection of what was or was not said.

MR TEDESCHI: I will ask a more general question, if I may.

THE COMMISSIONER: All right.

MR TEDESCHI: Q. What did you understand that Counsel Assisting was putting to you through the medium of that article?

A. I don't - it was bewildering to be honest, because it

1 was just such a long thing and they were scrolling down
2 and - it's - it sort of strikes me as unfair to sort of
3 just conjure up articles on the screen after a report has
4 been written and --

5

6 THE COMMISSIONER: Q. I'm so sorry, you regard it as
7 what, Dr Dalton?

8 A. Pardon?

9

10 Q. Did you say you regarded what was happening yesterday
11 as unfair?

12 A. Yeah, with the - with the part where you popped the -
13 where the article was put and up and the scrolling it up
14 and down --

15

16 MR TEDESCHI: Q. What did you understand was being put
17 to you, or suggested to you?

18 A. I struggled - I sort of struggled to - I think they
19 were trying to put to me that this article contained some
20 magnificent wisdom that I should have discovered and should
21 have used.

22

23 THE COMMISSIONER: Q. Did you ask anybody to have access
24 to the article to read it fully?

25 A. No, because I don't think that I'm - it's not
26 a criminal trial where I bear such a burden.

27

28 Q. Dr Dalton, I'm not asking you to tell me whether you
29 think this is or is not a criminal trial. But in any
30 event, you haven't seen the article, nor have you had
31 access to it in full?

32 A. No. And might I say politely, I think it's grossly
33 unfair to conjure things up and go, "Now you are beholden",
34 six years later, "to read this thing and respond to it".

35

36 Q. All right. Thank you.

37 A. It's outrageous.

38

39 Q. And was part of the problem you had yesterday that it
40 was outside your area of expertise, for example?

41 A. No. No.

42

43 THE COMMISSIONER: All right, thank you.

44

45 Yes, Mr Tedeschi.

46

47 MR TEDESCHI: Q. Dr Dalton, what do you say to a tool

1 that would include as gay hate crimes, crimes against
2 victims who happened to be members of the LGBTIQ community
3 but that that was not known to the perpetrator?

4 A. Well, if it's not - if it's not known to the
5 perpetrator, how on earth are you to adduce - yes, they're
6 a GLBTIQ person, but then if the thing is not known to the
7 perpetrator and it doesn't motivate their behaviour, in a
8 way it's not a gay hate crime, that the person who happens
9 to end up dead just happens to be GLBTIQ, which is still
10 terrible, but I don't think we'd sort of say - it might
11 sound like a nonsense, but you can't say if some
12 heterosexual person ends up dead it's some - using similar
13 logic, it just doesn't make a lot of sense.

14
15 Q. And what do you say to a tool that identifies a crime
16 as not being a gay hate crime where the perpetrator thought
17 that the victim was a member of the LGBTIQ community but,
18 in fact, they were not?

19 A. Yeah, well - and it's the - it runs to the idea, it's
20 interesting yesterday, because I know that every time you
21 talk about paedophilia, you're stepping into a minefield,
22 which terrifies me, but the - in disaggregating these
23 anti-paedophile types of gay hate from just, I'd say, the
24 more generic type of gay hate or gay bias --

25
26 Q. Can I take you back to my question, sorry?

27 A. Sorry, my apologies.

28
29 Q. What do you say about a tool that does not include as
30 a gay hate crime a crime that is committed against a person
31 who is not a member of the LGBTIQ community, but whom the
32 perpetrator thinks is a member of that community?

33 A. I know you've put it to me twice already but --

34
35 Q. Do you want me to say it again?

36 A. Yeah, the problem is when you have --

37
38 Q. What do you say about a tool that does not identify
39 a crime as a gay hate crime where the perpetrator thinks
40 that the person, say, is a gay man, but it turns out that
41 it's not a gay man; it's just a person that happened to be
42 going perhaps past a gay beat?

43 A. Well, it's not a - it's not a good tool.

44
45 Q. I would finally like to come to two categories that
46 you placed a lot of emphasis on in your report and that
47 were the subject of a lot of questions by Counsel Assisting

1 and some criticism in the reports obtained by the Inquiry.

2 A. Mmm-hmm.

3

4 Q. The first one is you placed importance on the
5 difference between proactive crimes and reactive crimes;
6 correct?

7 A. Yes.

8

9 Q. You defined in your report - and in your evidence -
10 proactive crimes as being those crimes where a perpetrator
11 or perpetrators go out actively seeking victims?

12 A. Mmm-hmm.

13

14 Q. Correct?

15 A. Yes.

16

17 Q. And again, correct me if I'm wrong, you identified
18 reactive crimes as being those crimes where the perpetrator
19 hasn't gone out seeking to commit an offence, but the
20 offence has occurred, as it were, almost on the spur of the
21 moment?

22 A. Sure.

23

24 Q. Is that right?

25 A. Yes, yes.

26

27 Q. Now, you were asked a number of questions by Counsel
28 Assisting, and indeed some questions by the Commissioner,
29 about why proactive crimes are more of a threat to society
30 than reactive crimes?

31 A. Yeah, and I --

32

33 Q. Could you tell us your rationale for that reasoning?

34 A. Yeah, I felt as you - as one does in this process
35 yesterday, it's hard to often collect your thoughts, but
36 I guess with - with reactive, and it runs to - proactive,
37 rather, it runs to this idea, certainly some of the
38 Taradale matters, et cetera, about gangs or organised
39 people or more than one person, and I guess the problem is,
40 as we've seen with a lot of these cliff deaths, et cetera,
41 if there are, loosely speaking, gangs or people who are
42 affiliated involved, they can do it more frequently or
43 regularly, if that's the term; they can get organised, and
44 the threat sort of endures.

45

46 Whereas in the reactive, and, you know, there are so
47 many famous cases or examples of this, typically, of

1 course, the one person ends up dead but the circumstance
2 isn't likely to be repeated.

3

4 Q. So, likely or unlikely?

5 A. Unlikely to be repeated because the event is over.
6 Well, I guess, unless --

7

8 Q. What's the classic example?

9 A. You can indulge the idea if they're not caught and
10 then they end up in a similar circumstance, it might happen
11 again, but --

12

13 Q. What's the classic situation you're thinking of.

14

15 THE COMMISSIONER: Well, the underlying assumption is
16 there is one, Mr Tedeschi. I really am not finding this
17 very helpful because it's just questions which may have
18 been provoked by conferring but are not helpful by putting
19 words into this man's mouth. But please go on.

20

21 MR TEDESCHI: Q. Please continue.

22

23 THE COMMISSIONER: Q. So the assumption is, Dr Dalton,
24 there is a classic situation. Do you agree with that
25 proposition or not?

26 A. Yeah, I'm not sure there's a classic situation, but in
27 some of the cases, and certainly I was aware of it just
28 from all the famous case law and the discussions, there are
29 these often younger men who might find themselves in a
30 circumstance where - I mean, Gillies or whatever. I mean,
31 we do talk about classic, and sometimes - I remember the
32 Gillies case because, well, it was particularly weird
33 because he said the touch of the gay man triggered the
34 memory of his father's incestuous touch or something. I
35 remember thinking, "God, that's a bizarre sort of thing."
36 But certainly where something happens and then the stable
37 psychic sexual identity of the typically younger man
38 becomes threatened and they just - you'd almost need
39 a psychiatrist to explain it better. They react with
40 hostility against the thing that they say so hate about
41 themselves that might be latent, which is homosexual
42 desire. And that could happen in - there were - I wish
43 I had the - my - the files even to refresh my memory.
44 But that's about as much as I can say, perhaps.

45

46 MR TEDESCHI: Q. The Commissioner asked you quite a few
47 questions about why proactive crimes are more --

1
2 THE COMMISSIONER: I don't think I did. I think your
3 recollection, Mr Tedeschi, sadly, is not accurate. I did
4 not ask - my recollection is not one question - about this.
5 It was asked a lot by Counsel Assisting. You've got
6 a junior there with a transcript on the screen. If you
7 would like to go to a question I asked or questions I've
8 asked, by all means do so. But my recollection - and it
9 may not be right - is that I never asked one question about
10 this. Not one.

11
12 MR TEDESCHI: I'm sorry, Commissioner. My memory is --

13
14 THE COMMISSIONER: No, please, don't let my undoubted
15 powers of persuasion, Mr Tedeschi, cause you to doubt your
16 own position. But I just don't remember.

17
18 MR TEDESCHI: Yes.

19
20 THE COMMISSIONER: I'm not stopping you asking about it,
21 clearly.

22
23 MR TEDESCHI: I don't want to delay the proceedings.

24
25 THE COMMISSIONER: And I'm never one to refuse
26 attribution, I can assure you.

27
28 MR TEDESCHI: Q. You were asked some questions by
29 someone --
30 A. Okay, yes.

31
32 Q. -- yesterday about why it's more of a threat to
33 society and why it's important to distinguish proactive
34 crimes from reactive crimes. Can you explain why it's more
35 of a threat to society?

36 A. Yeah, I just think when it's - obviously the end
37 result of the dead body is the same result. But when it's
38 proactive, and it's planned and they go out of their way,
39 it's one thing to end up in a circumstance in a living room
40 with someone late at night where some sort of human
41 personal interaction occurs and a psychic reaction is
42 triggered and someone is dead, but to be proactive and
43 going out to beats or clifftops or areas with one or
44 a second person, hunting or looking for targets as - you
45 know, in the high-water mark of some of these cases, what
46 was going on. Thankfully, it's all in the past.

47

1 I mean, the one thing that is good, at least we can
2 all perhaps agree on, is that we live in an era now where
3 this sort of stuff is in the rear view mirror. It's not
4 really happening anymore.

5
6 Q. In terms of numbers, is one more significant than
7 another?

8 A. Pardon?

9
10 Q. In terms of the numbers of perpetrators, is one more
11 significant than another? See, I'm trying to identify the
12 factors that make proactive crime more of a serious threat
13 to society than reactive crime. Is the numbers of
14 perpetrators, one of the factors?

15 A. Well, it could be, because if you've got more than one
16 perpetrator you can potentially have more than one
17 victim --

18
19 Q. It's repetitive?

20 A. -- and recurrent victims, a victim one month later and
21 a few months after that.

22
23 Q. So the repetition of the offences --

24 A. Yeah.

25
26 Q. -- is more of a threat to society?

27 A. I honestly think so. Which is not to say - how would
28 I put it - that the reactive version, which can occur
29 somewhat spontaneously in various contexts, is no more
30 lethal or terrible.

31
32 Q. In individual cases?

33 A. In individual cases, yeah.

34
35 Q. All right. Finally, the other area where you
36 distinguished certain types of gay hate crimes and the
37 police did not, and for which there was some criticism in
38 some of the other reports, was that you treated separately,
39 to some degree, gay hate crimes and anti-paedophile crimes?

40 A. Mmm-hmm.

41
42 Q. Now, firstly, it was unclear to me from your evidence
43 when you calculated the number of gay hate crimes, were you
44 including those that were also anti-paedophile crimes or
45 were they - were they discounted as being gay hate crimes?

46 A. No, they - they were counted but they were counted as
47 this separate sub-category.

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. So they were counted at gay hate crimes but a sub-category of that?

A. Yes.

Q. Could you explain to the Commissioner, why did you think that it was important to categorise them as a sub-category of gay hate crimes?

A. Okay. It's complicated but to me, the phenomenon of this anti - of the animus, the nuance is really worth capturing, insofar as you can split it or make it sort of a bit more nuanced. And, gee, it's complicated, because certainly back in the era, you could say, well, you know, one person's homosexual was another person's rock spider was another person's paedo, or whatever the term was. Just to complicate it even more further, for some other perhaps perpetrators, they would preserve some sort of crude distinction and a paedo was way worse than a homosexual, and that makes it even more confusing.

But certainly - and I - I did so poorly trying to explain it yesterday but the thing that - the thing that sort of worries me, and it's kind of like the existence of the judgment of that famous Green case. If a heterosexual man is murdered [sic] in some context where he can later tell a concocted story about an advance made by a bisexual or a gay man, it can be mitigated against his violence.

It's interesting, we seem to be in an era now of obviously greater tolerance of homosexuality, which is a wonderful thing, but gee, God help any man on the planet, or in Australia, if they're ever perceived, "perceived" being the right word, to be a paedophile and therefore subject to lethal violence. In fact, I sort of think this is the - this is the danger or the bias category that endures the most, because there seems - I mean, there are still people who don't like gays and will assault them, et cetera, but paedophilia certainly doesn't seem to have had an awful lot more acceptance in the modern era.

Q. And you are in no sense seeking to excuse paedophilia?

A. No. No, please. No.

Q. Do I understand you correctly in saying that even people who commit vile offences are entitled not to be assaulted and murdered?

A. Absolutely. And I don't shy away from that. I think

1 in the - sorry. I think in the report, I said something
2 about Professor Gail Mason's comment about the paedophile
3 being undeserving of the category of victim. I hope
4 I didn't quote poor Gail out of context. She's a nice
5 person. But, as I read that, I sort of thought, that
6 really - that really disturbs me, because paedophile
7 offences are horrific, they cause terrible trauma and that
8 they are to be identified and prosecuted.

9
10 But paedophiles as human beings are often probably
11 people who are the - who are the product of horrific sexual
12 neglect and abuse themselves when kids, and that perhaps
13 explains their offending, and I just from a human rights
14 perspective - and I used to help teach Dr Marmo (?) - help
15 Dr Marmo teach some of her lectures. I just don't like to
16 think of any category of human who is not deserving of the
17 status of victimhood under certain contexts. It's just not
18 a good thing.

19
20 Q. Sorry, there is one further topic that I omitted to
21 ask you at the time. Your article that you wrote with
22 Professor de Lint - can I take you to volume 8, tab 205.
23 [SCOI.82022_0001]?

24 A. Mmm-hmm.

25
26 Q. Could I take you, please, to --

27 A. I'm happy to look on the screen, yeah.

28
29 Q. -- page 731. It's page 9 of the document. Thank you.
30 And at the bottom of the second full paragraph, you were
31 asked some questions by Counsel Assisting about your
32 reference there to the BCIRF?

33 A. Yes.

34
35 Q. The BCI form?

36 A. Yes.

37
38 Q. And it was suggested to you that in this article, it
39 was misleading, because you had not disclosed to your
40 reader the fact that, in fact, you had discarded the BCI
41 form as a tool for varying reasons?

42 A. Mmm-hmm.

43
44 Q. Could I take you, please, to page 14 of the article,
45 page 736 of the journal, down the bottom of the page,
46 footnote 11. Does that footnote read as follows:

1 *As is clear in the research, and recalling*
2 *the point made by Mason ... that some*
3 *groups do not merit inclusion as*
4 *a vulnerable group, it is a perverse*
5 *consequence if the instrument counts bias*
6 *against paedophiles as --*

7
8 MR GRAY: Commissioner, I don't believe such a proposition
9 was put yesterday. A different proposition altogether was
10 put - what appears at the top of page 736.

11
12 THE COMMISSIONER: What was put quite clearly,
13 Mr Tedeschi, which, if I may say so, footnote 11 doesn't
14 address, is that the express reason given as to why the
15 methodology adopted by Flinders was different were the
16 reasons put at the top of the article.

17
18 MR TEDESCHI: Yes.

19
20 THE COMMISSIONER: Now, the mere fact that there is
21 a criticism implied or otherwise in the 10-point indicator
22 form in, if I may say so, fairly nuanced and in express
23 terms in footnote 11, does not change or, rather, it was
24 put yesterday that the express assertion at the top of the
25 page, I will be reminded in a moment of the page --

26
27 MR GRAY: 736.

28
29 THE COMMISSIONER: -- 736:

30
31 *... the academic team developed its own*
32 *assessment tool because ...*

33
34 So unfortunately for the authors, on one view, they, in
35 text, assert the reason, because they adopt the tool, and
36 then to suggest as yesterday or today, rather, that
37 footnote 11 should be some form of counterbalance, on one
38 view of it, might be a bit of a tall order, Mr Tedeschi.

39
40 MR TEDESCHI: I have taken the witness to the wrong part
41 of that footnote, if I could take him to the part that is
42 relevant.

43
44 THE COMMISSIONER: Yes.

45
46 MR TEDESCHI: Q. Midway through that footnote there are
47 these words:

1
2 *In addition, we deemed that the ten-point*
3 *Bias Indicator Review Form did not offer*
4 *a straightforward relationship between the*
5 *factors and the designation of bias.*
6 *Instead, the team used a simple three-point*
7 *assessment relying on the expression,*
8 *intentionality, and denunciatory*
9 *communication of a proactive or associative*
10 *animus connected to the criminal deed.*

11
12 THE COMMISSIONER: Yes, but your problem, Mr Tedeschi, is
13 this. I'm looking at that footnote and I'm looking at what
14 is said there, and it is quite different to what is said at
15 the top of 736. Indeed, what might be said in relation to
16 this part of the footnote is that it is further misleading,
17 because it does not confront the full force and effect of
18 footnote 20 in the report in Parrabell, and the evidence
19 that this witness has given up, in sitting listening to
20 Mr Crandell and Dr Dalton - no doubt Dr de Lint may be
21 asked the odd question about it - they didn't use the tool
22 for the reasons explained, that it was simply not fit for
23 purpose. This here serves to underplay by simply saying it
24 offered not a straightforward relationship.

25
26 Now, on one view, you juxtapose footnote 11 against
27 what is the top of 736, and if you want to talk about
28 misleading, then, on one view of it, it doesn't really
29 help. In fact, it's worse, because it does not candidly
30 address footnote 20 in the Parrabell report itself.

31
32 So I frankly don't see how in - I won't stop you
33 putting it. No doubt you've had an opportunity to talk to
34 Dr Dalton about this. But my problem is that I don't think
35 it improves the situation, tentatively though that view is
36 expressed.

37
38 MR TEDESCHI: Commissioner, what the footnote discloses is
39 that, in effect, they did not use the BCI form - they
40 rejected it - and they adopted their own instead.

41
42 THE COMMISSIONER: That is not accurate, Mr Tedeschi,
43 because at the top of 736 --

44
45 MR TEDESCHI: I agree that what it says at the top of the
46 page is --

47

1 THE COMMISSIONER: But the problem is that if they had
2 gone on to say something more direct at 736, but they're
3 giving the reader - as you would know, as Dr Dalton would
4 know, not everyone is fixated on footnotes, and so if one
5 reads the text of the article, the academic team developed
6 its own assessment tool, not because the BCI form did not
7 provide a straightforward answer, but because it needed to
8 differentiate.

9
10 Now, that's the substantial reason why they adverted
11 to something other than the form. The mere fact that in
12 footnote 11, many pages later, they say, "We deemed the
13 10-point form as not offering a straightforward
14 relationship", doesn't mean it didn't offer a relationship,
15 and so it is not a cogent reason why the form was rejected.
16 The cogent reasons are those which are stated at 736 top of
17 the page.

18
19 Now, by all means, ask the question. Dr Dalton has
20 heard the exchange and no doubt he will say what he wishes
21 to say about it. But quite frankly, tentative view only,
22 this is hardly a disclosure of what is in footnote 20.

23
24 MR TEDESCHI: Commissioner --

25
26 THE COMMISSIONER: For example, they didn't go on to say
27 "We rejected it because we asked the police was there any
28 academic or empirical material supporting the form, and
29 couldn't find it". So if they had repeated footnote 20
30 per se, no-one could complain, but there is quite
31 a distinction between what is said - tentative view only.
32 Go on, Mr Tedeschi.

33
34 MR TEDESCHI: Thank you, Commissioner.

35
36 Q. Dr Dalton, you have heard what the Commissioner has
37 said. You have accepted in answer to questions from
38 Counsel Assisting that what is at the top of page 736 is
39 potentially misleading, is that right, or it doesn't
40 disclose the real reasons why you rejected the BCI form?
41 A. I honestly don't know what to say. I just don't know
42 what to say. It's just bewildering. I just --

43
44 Q. Do you accept that it is inaccurate to state:

45
46 *... the academic team developed its own*
47 *assessment tool ...*

1
2 for the reason that:

3
4 *... it needed to differentiate --*

5
6 A. No, it is not inaccurate.

7
8 Q. --

9
10 *the target of bias --*

11
12 A. It doesn't seem to be inaccurate to me.

13
14 Q. What the Commissioner is suggesting is that the real
15 reason for rejecting the BCI as a tool was not because you
16 wanted to differentiate the different kinds of bias, but
17 because you found the BCI tool to be inadequate.

18 A. Well, we certainly did find the BCI tool to be
19 inadequate.

20
21 Q. Yes. But what the Commissioner has pointed out is
22 that in that, at the top of page 736, that is not what you
23 have said.

24
25 THE COMMISSIONER: Q. To put it more expressly,
26 Dr Dalton, what you say at the top of 736 is not what you
27 said in footnote 20 to your section of Parrabell.

28 A. Perhaps it's not.

29
30 MR TEDESCHI: Q. You don't disclose in the top of that
31 paragraph at the top of page 736 that the reason why you
32 rejected the BCI form was because you found it to be
33 inadequate to the task?

34
35 MR GRAY: Commissioner, I interrupt with some hesitation
36 but this is really an attempt to get the witness to say the
37 opposite of what he said in plain terms yesterday.

38
39 THE COMMISSIONER: No, I know that's what Mr Tedeschi is
40 trying to do, but as he seems to be regarding Dr Dalton as
41 his witness, I understand forensically what he is doing.

42
43 I won't stop you, Mr Tedeschi. It will be a matter in
44 the end for me to weigh up all the various answers and if
45 you want to put direct questions to him as if you were
46 cross-examining him, but quite frankly, you have conferred
47 with him and - or you told me were you going to, I won't

1 presume you did, but you told me you were going to confer
2 with him, and so ultimately his status qua the NSW Police
3 Force will be something I will take into account given the
4 loaded nature of the questions you are now posing. It is
5 evidence-in-chief. You wouldn't be able to ask those
6 questions in chief, and I'm not going to stop you because,
7 as I have said before, this is not adversarial litigation,
8 but it will be a question ultimately of me weighing up
9 Dr Dalton's evidence on this point and I will hear from
10 both of you in due course. But I won't stop you. You go
11 on.

12
13 MR TEDESCHI: Q. Dr Dalton, have you read what's at the
14 top of page 736? Yes or no, have you read it?

15 A. Yes.

16
17 Q. Have you read what's in the latter half of footnote
18 11? Could you read that, please. The words "In addition";
19 do you see that?

20 A. Yes, "do not offer a straightforward" - yes.

21
22 Q. Do you recall footnote 20 in your report identified --

23 A. Not well. Not well. I'm sorry.

24
25 Q. In your report, you identified the inadequacies --

26 A. Yes, we did.

27
28 Q. -- of the BCI form?

29 A. Yes.

30
31 Q. And you explained why you didn't use that form?

32 A. Yes.

33
34 Q. Because it was an inadequate tool?

35 A. Mmm-hmm.

36
37 Q. And you developed your own tool instead?

38 A. Yes.

39
40 Q. Do you agree that at the top of page 736 you don't
41 refer to that reason why you rejected the BCI form?

42 A. Yes, it appears that we don't.

43
44 Q. What do you say about what you've written in footnote
45 11?

46 A. I don't - I don't recall whether I wrote the footnote
47 or Professor de Lint wrote it. With the passage of time,

1 I've got - when I --
2
3 Q. What do you say about the content of it and the real
4 reason why you rejected the BCI form?
5 A. Well, the - surely it's become apparent now that the
6 real reason we - irrespective of whether it's here, there,
7 or everywhere in this document, the real reason we rejected
8 the BCI form was because it was a terrible instrument and
9 it wasn't fit for purpose. We couldn't use it.
10
11 THE COMMISSIONER: Q. You could have said that quite
12 candidly in this article, couldn't you?
13 A. Yes. I don't - yes.
14
15 Q. Instead, what you said in the footnote was that it did
16 not offer a straightforward relationship. Now, that's only
17 a half truth, isn't it?
18 A. No, I - no, I reject that, actually.
19
20 Q. When you say it was not fit for purpose, it wasn't
21 a question of offering only a straightforward or other
22 relationship; it simply wasn't fit for purpose?
23 A. Someone said before that --
24
25 Q. No, please.
26 A. No, no, no.
27
28 Q. No, Doctor?
29 A. No.
30
31 Q. No, Doctor, please. Would you agree with me that your
32 evidence --
33 A. No, no, I can't agree with you.
34
35 THE COMMISSIONER: You can't, all right. Would you please
36 conclude, Mr Tedeschi.
37
38 MR TEDESCHI: Yes, I have concluded, Commissioner.
39
40 THE COMMISSIONER: You have? All right.
41
42 Dr Dalton, you have excused from further attendance,
43 so you may leave, and return, if you wish, to South
44 Australia.
45
46 <THE WITNESS WITHDREW
47

1 MR GRAY: Commissioner, I see the time. I am happy to
2 begin with the next witness.

3
4 THE COMMISSIONER: No, I will take the break. I think
5 Dr de Lint has been here most of the morning, and so he has
6 heard what has gone on, and I think I will take the break
7 now so that Dr Dalton can leave or perhaps remain - his
8 choice - and then Dr de Lint can get himself settled for
9 perhaps the afternoon. So I will take the break now,
10 thank you.

11
12 **SHORT ADJOURNMENT**

13
14 THE COMMISSIONER: Yes, Mr Gray.

15
16 MR GRAY: Commissioner, the next witness is Dr Willem
17 de Lint. I call Dr de Lint.

18
19 THE COMMISSIONER: Doctor, would you please come forward,
20 thank you.

21
22 **<WILLEM DE LINT, sworn: [12.24pm]**

23
24 **<EXAMINATION BY MR GRAY:**

25
26 MR GRAY: Q. Dr de Lint, you participated in the
27 academic review of Strike Force Parrabell?

28 A. Yes.

29
30 Q. Can I ask you to have a look at volume 2
31 [SCOI.76961.00007_0001], tab 23.

32 A. Yes.

33
34 Q. Can you find tab 23?

35 A. Yes, that's a large tab. Which page?

36
37 Q. It shouldn't be a large tab. It's just the request
38 for tender, or request for quotation?

39 A. Oh, yeah, yeah.

40
41 Q. On page 7, there is a page with a heading "Terms of
42 Reference".

43 A. Yep.

44
45 Q. Now, were you, and/or are you, familiar with this?
46 This was the request for tender, the quotation, that came
47 from the police, which you and Dr Dalton and Dr Tyson

1 answered by submitting a tender?
2 A. I don't recall it. No doubt - I guess I saw it but
3 I don't recall it, yeah.
4
5 Q. Well, I wanted to ask you about one thing only -
6 I suppose two. The first bullet point is "A collaborative
7 approach" was what the police wanted?
8 A. Yes.
9
10 Q. And the fourth one is this:
11
12 *Access and review original source materials*
13 *as required.*
14
15 A. Okay.
16
17 Q. You see that?
18 A. Yep.
19
20 Q. Now, did you understand that you could have or should
21 have accessed the original source materials or what was
22 your understanding?
23 A. My understanding - well, my understanding was that -
24 is that there was - must have been some discussion between
25 at some point - and I don't know when - between Derek and
26 Assistant Commissioner Crandell with respect to that
27 access, and I think that Derek had deemed or they had
28 deemed together that they - that the original source
29 materials weren't going to be reviewed by us.
30
31 Q. So your understanding, perhaps from that basis, was
32 that you, the academic team, were not going to be looking
33 at the original source materials?
34 A. Yes. That was my understanding.
35
36 Q. Okay. And in fact, I think this is common ground,
37 what the academics, including yourself, actually had was
38 the completed Bias Crime Indicator Forms --
39 A. Yes.
40
41 Q. -- for the 85 or so cases?
42 A. Yes, that formed two large binders, I think, or three
43 large binders.
44
45 Q. And that's it? That's what you, the academics, had?
46 A. Yes, in our possession. There would have - there
47 would have been other materials that we - that was made

- 1 reference to, perhaps - I'm not sure how much of that would
2 have been shown to Derek in meetings with - actually on
3 location meetings with the police. I don't know.
4
- 5 Q. Well, apart from that possibility, so far as you're
6 aware, all that you had, first of all, personally, was the
7 completed --
8 A. Yes.
9
- 10 Q. -- Bias Crime Indicator Forms?
11 A. Yes.
12
- 13 Q. And how many meetings were there face to face that you
14 recall where --
15 A. With the police?
16
- 17 Q. Where Dr Dalton was with the police in person?
18 A. I think there were three or four in person. This is
19 just vague. You know, I can't be absolutely certainly.
20 With the police. And then, of course, myself and Dr Dalton
21 and Dr Tyson had quite a few.
22
- 23 Q. You remember that recently - that is, this year - you
24 submitted a response document to the Commission --
25 A. Yes.
26
- 27 Q. -- responding to the expert reports?
28 A. Yes, yes.
29
- 30 Q. And I could take you to it if you needed it --
31 A. Okay.
32
- 33 Q. -- but one of the things you said was that the Terms
34 of Reference by the time of your involvement were limited
35 in some ways and one was that they did not permit an
36 examination of all the original case files?
37 A. Yeah, yeah.
38
- 39 Q. Now, I've taken you to what the Terms of Reference
40 actually say.
41 A. Okay.
42
- 43 Q. But in any event, your understanding was that you were
44 not able to look at those files?
45 A. Yes. Yes.
46
- 47 Q. Now, the completed bias crime forms that you did have

1 in the two or three folders were written --
2 A. These were binders, not folders.
3
4 Q. Okay, binders - were written by the Parrabell police
5 officers, filled in by the Parrabell police officers;
6 correct?
7 A. Yes - now, I wish I had a binder in front of me,
8 because it's been - and I don't - but whether there were
9 quotations or remarks by other people, witnesses,
10 statements included in addition to that, of course, there -
11 I think there would have been.
12
13 Q. We may be slightly at cross-purposes.
14 A. Okay.
15
16 Q. The form itself, the Bias Crime Indicators Form,
17 blank, is an appendix to your report, isn't it?
18 A. Yes, yes.
19
20 Q. To the Parrabell report?
21 A. Yes.
22
23 Q. And the blanks, when you got the two or three binders,
24 had been filled in in each of the 85-odd cases?
25 A. Yeah, no, there's - I believe there's more to it than
26 that. I wish I had a binder on me to demonstrate, but each
27 of these cases ran a number of pages. I think altogether
28 it was maybe sixteen, seventeen, eighteen hundred pages or
29 something.
30
31 Q. Yes.
32 A. So if what you're saying is that there would have been
33 only a couple of lines of text in each of them.
34
35 Q. No, no, no, I'm not saying that. I'm saying that
36 however many lines of text there were --
37 A. Yeah.
38
39 Q. -- you had the completed forms, with all the text
40 inserted, however long that was, for the 85 odd cases?
41 A. Yeah. Were they completed? There was a process of
42 them being completed in terms of scoring by the Strike
43 Force Parrabell. So they were in a process of completing
44 their evaluation of each of these cases, as --
45
46 THE COMMISSIONER: Q. Dr de Lint, the form itself, which
47 is an appendix as Mr Gray suggested, to your Parrabell

1 report --
2 A. Yes, I understand.
3
4 Q. -- runs for approximately 20-odd pages.
5 A. Okay.
6
7 Q. Okay. And if you got three lever arch volumes and
8 several hundreds of pages, what he's asking you is if you
9 can recall - if you can't, so be it - that for each and
10 every case that you were asked to review, whether it was
11 85, 83 or 88 doesn't matter, you had a completed
12 20-page document, roughly, for each and every case. That's
13 what he's asking you.
14 A. Yes.
15
16 Q. If you don't recall either way, that's fine.
17 A. Well, I'm just - I'm struggling over the term
18 "completed".
19
20 Q. "Completed" in the sense of filled out. In other
21 words, you didn't get 85 times 20 pages blank. What he's
22 putting to you is that you got, in the materials that you
23 got, you got the police's summary in the form of the
24 Parrabell bias crime form, the completed summary in each
25 and every case, completed by the police, as to the answers
26 they gave to the various questions in the 20 pages of text.
27 A. Okay. Yes.
28
29 MR GRAY: Q. Let me show you an example.
30 A. That's fine. The answer is yes.
31
32 Q. I don't want there to be a foundational confusion.
33 Could Dr de Lint have volume 13, and would you turn,
34 please, to tab 266C [NPL.0129.0001.0001_0001]?
35 A. Yes.
36
37 Q. Can you see that's a Bias Crime Indicators Review Form
38 for a Mr Dutfield?
39 A. Yes.
40
41 Q. Can you see that?
42 A. Yes.
43
44 Q. Now, it runs, this particular one, for 19 pages?
45 A. Yes.
46
47 Q. And you can see that the parts which are blank in the

1 template attached to your Parrabell report have been filled
2 in - that is, populated with text - throughout, haven't
3 they?
4 A. Yes.
5
6 Q. And that's what you got, is it not?
7 A. Yes.
8
9 Q. With respect to all the 85 or so cases; is that right?
10 A. Yes. Yes.
11
12 Q. Now, back to where I was. Those completed forms,
13 completed in that sense --
14 A. Yes.
15
16 Q. -- were written by the Parrabell officers following
17 their review of whatever historic paper holdings there were
18 for a particular case?
19 A. Yes.
20
21 Q. And so the text of the completed forms, as in the
22 example we just saw, was entirely dependent on, firstly,
23 the nature and extent and quality of whatever there was in
24 existence in the historic paper holdings?
25 A. Yes.
26
27 Q. And, secondly, dependent on the degree of reliability
28 and skill brought to the task of reviewing that material by
29 the particular officer or officers who had worked on
30 a particular case?
31 A. Yes.
32
33 Q. Now, as we've established, you never saw the original
34 paper holdings yourself?
35 A. No.
36
37 Q. Did it occur to you that in order to review the
38 quality of the work that the police had done, you would
39 have needed to scrutinise the paper holdings that they had
40 looked at to see what sort of a fist they had made of it?
41 A. Yes. It certainly did.
42
43 Q. Because without doing that, you couldn't really know
44 how good or bad their review work had been?
45 A. No, we were dependent on the quality of the text, the
46 accuracy of the text that was in front of us, yep.
47

1 Q. Yes, and just to put the question slightly
2 differently, you were dependent on the quality of the text
3 in the completed forms, but to review how good that quality
4 was, you would have had to go and check the original
5 material, wouldn't you?

6 A. Yep. If - you know, if the material that was in that
7 form, you know, was - was very, very different or
8 substantially different or somewhat different from - well,
9 let me backtrack a little bit and say that I would guess
10 that - that different officers would fill those forms out
11 to varying standards, as individuals will do any job to
12 varying standards, and if you backtrack, I think you can
13 find that you're going to backtrack towards varying
14 standards, you know, throughout the chain of materials that
15 spring from an event.
16

17 Q. Quite. So you've accepted, a question or two ago,
18 that unless you yourself, or you yourselves, went back and
19 looked at the original materials that they had looked at,
20 you couldn't know how well or badly they had performed
21 their task of filling out the form?

22 A. No.
23

24 Q. Now, you obviously never did that. I'm not saying
25 that critically --

26 A. No.
27

28 Q. -- but you didn't do that?

29 A. No.
30

31 Q. Looking back on it now, should you have?

32 A. I would have liked to do that, yes. I don't think it
33 was in my role to do that, and so, yes, but I would have
34 liked to do that.
35

36 THE COMMISSIONER: Q. And more to the point, neither you
37 nor Dr Dalton had quoted to do that?

38 A. We what?
39

40 Q. You hadn't quoted, your fee wasn't --

41 A. Well, I'm - yeah, I don't know.
42

43 Q. When you say you don't know, what do you mean, you
44 don't know? Are you meaning to suggest that you're not
45 sure what Dr Dalton had in his mind as to the fee being
46 offered to the university as to precisely how much work you
47 would have to do?

1 A. Yes. In other words, I don't know what it would have
2 entailed in terms of, you know, calculating the time it
3 takes against an allocation of funds.

4
5 THE COMMISSIONER: All right.

6
7 MR GRAY: Q. Well, although you didn't see the original
8 source materials, you presumably became aware from the
9 amount of work that the police were having to do --

10 A. Yes.

11
12 Q. -- that it was very voluminous?

13 A. Yes.

14
15 Q. And if you had had to do it yourselves, input it
16 yourselves, in the way that I've just been suggesting to
17 you --

18 A. Yes.

19
20 Q. -- it would have taken you a great deal longer --

21 A. Yes.

22
23 Q. -- than the academic review in fact took?

24 A. Yep. Yep.

25
26 Q. Now, just coming to the form itself, your team - you
27 and Dr Dalton and Dr Tyson - came to the view, as we see in
28 the report, that the form as an instrument for the Strike
29 Force Parrabell paper review exercise was not fit for
30 purpose?

31 A. I wouldn't say - I wouldn't go that far and say it
32 wasn't fit for purpose. I would say that we struggled to
33 overlay our evaluation using the parameters of the form.
34 That's how I would put it. So - I think "fit for purpose"
35 is very strong. But, you know, it - it provided us - if
36 the purpose was to - for our - to provide us with
37 information in order to see what relevant material,
38 organised in some way, there was in order to make - in
39 order to begin to make an evaluation, then, of course, it
40 was fit for purpose.

41
42 Q. Well, let's go to what you said about it in the
43 report. If Dr de Lint could have exhibit 1, tab 2,
44 [SCOI.02632_0001] this is the actual Parrabell report
45 itself.

46 A. Oh, okay.

47

- 1 Q. Tab 2?
2 A. Yep.
3
4 Q. As you recall, the first 46 or so pages are the police
5 part of the report?
6 A. Yes.
7
8 Q. And then the balance, starting at page 47, is the
9 academic part?
10 A. Yep.
11
12 Q. If we turn to page 67 --
13 A. Yep.
14
15 Q. -- you refer to the form there towards the bottom of
16 that page?
17 A. Yes.
18
19 Q. Do you see that?
20 A. Yep.
21
22 Q. Just while I'm on that page, you see the heading there
23 is "Scoring the cases"?
24 A. Yep.
25
26 Q. And in the first two lines of this section, it says:
27
28 *A team of detectives ... reviewed and*
29 *scored each case.*
30
31 Do you see that in the first two lines?
32 A. Yes.
33
34 Q. What do you mean by "scored"?
35 A. Well, they provided an assessment of whether it was
36 one of the categories that ended up being - yep.
37
38 Q. So they provided the form, filled out as per the
39 example that I showed you a while ago?
40 A. Yep.
41
42 Q. With answers to the various questions, "Yes", "No",
43 and various things filled in. But it's not a scoring in a
44 sense of a numerical ranking?
45 A. No.
46
47 Q. Now, towards the bottom of that page you say the

1 investigators used the form, and you say it comprised 10
2 bias indicators, which you have set out.
3 A. Mmm.
4
5 Q. Now, tell me what you know in this respect. The form,
6 of course, contained the 10 indicators?
7 A. Yes.
8
9 Q. But not only the 10 indicators, you are aware of
10 that --
11 A. Yeah.
12
13 Q. -- there was more to the form than just the 10
14 indicators?
15 A. Well, the one you just showed me.
16
17 Q. Let's look at the example annexed to your report.
18 It's in the document you're looking at, if you turn to
19 page 121?
20 A. Yep. Yep.
21
22 Q. Do you see that's the form that you have understood
23 that the police were using?
24 A. Yep.
25
26 Q. And there are 10 indicators in it, the first one being
27 "Differences", on the front page?
28 A. Yes.
29
30 Q. And then the second one is "Comments, written
31 statements, gestures"?
32 A. Yep.
33
34 Q. And then the third, "Drawings, markings, symbols,
35 graffiti" and all the way through to 10?
36 A. Yep.
37
38 Q. They're the 10 indicators; is that right?
39 A. Yes.
40
41 Q. Yes.
42 A. Yes.
43
44 Q. Right. But the form, as we can immediately see, has
45 much more in it than just the 10 indicators. It has
46 a series of prompts in respect of each indicator?
47 A. Yes.

- 1
2 Q. And, although perhaps a little unhelpfully under the
3 heading "Indicators", it then has four categories that can
4 be chosen --
5 A. Yes.
6
7 Q. -- with a "Yes/No", namely, "Evidence of Bias Crime";
8 "Suspected Bias Crime; "No Evidence of Bias Crime"; and
9 "Insufficient Information"?
10 A. Yes.
11
12 Q. Just while I'm here, in the case of "Evidence of Bias
13 Crime", you see that the requirement for a "Yes" answer is:
14
15 *... sufficient evidence/information exists*
16 *to prove beyond a reasonable doubt --*
17
18 A. Yes.
19
20 Q. --
21
22 *that the incident was either wholly or*
23 *partially motivated by bias ...*
24
25 A. Yes.
26
27 Q. And you know that the beyond a reasonable doubt
28 criminal standard is a high standard?
29 A. Yes.
30
31 Q. So I want to make clear, so that when I get to some
32 later questions, we know what we're talking about, that the
33 form is more than and different from just the indicators,
34 isn't it?
35 A. Yes, it is.
36
37 Q. Now, at page 68 of the report, towards the top of the
38 page, you say that indicators 1 to 9 are derived from a
39 United States document?
40 A. Yes.
41
42 Q. And you say that indicator 10 had been developed by
43 the New South Wales Bias Crime Unit?
44 A. Yep.
45
46 Q. Now, in the middle of that paragraph, after referring
47 to the indicators having been derived from the United

1 States, there's a footnote 20, which we then see at the
2 bottom of the page?

3 A. Yes.

4

5 Q. If you read that to yourself --

6 A. Yes.

7

8 Q. -- you say in the footnote, about the middle of the
9 footnote:

10

11 *... the academic team are reluctant to*
12 *endorse these indicators ...*

13

14 A. Yep.

15

16 Q. That's right, isn't it?

17 A. Yep.

18

19 Q. And then at page 70, one page or two on, at the bottom
20 of the page, you say that:

21

22 *As academics, we commenced our assessment*
23 *of the [Parrabell] review with a query*
24 *concerning the authorities cited by the*
25 *police to support the use of the BCIRF*
26 *instrument ...*

27

28 In other words, the form?

29 A. Yes.

30

31 Q. And you go on to say, by all means read it to
32 yourself, in the next paragraph - sorry, the same
33 paragraph, on the next page but part of this paragraph:

34

35 *While we most often agreed on the result,*
36 *we were less enthused about the means.*

37

38 A. Yep.

39

40 Q. And the upshot was that you yourselves simply did not
41 use the form in your exercise; you constructed
42 a different --

43 A. Yeah.

44

45 Q. -- structure within which to carry out your work?

46 A. Yeah, I suppose in one sense we reconstructed some
47 parts of the indicators, because, as is described there,

1 I mean, there are elements of it which were confusing to
2 us - absence of motive is one indicator; motive is another
3 indicator. This ended up being too confusing for us and so
4 that's - that's why we, you know, wanted to get behind what
5 was being done with it, with that tool, and provide
6 another --

7
8 Q. Well, in the response document that you submitted to
9 this Inquiry a month or two ago --

10 A. Yes.

11
12 Q. -- I had better put that in front of you, it is volume
13 12, tab 258 [SCOI.82365_0001]. At page 3 of your
14 document --

15 A. Yes.

16
17 Q. -- there is a heading halfway down called, "What is
18 the purpose of the BCIF"?

19 A. Yes.

20
21 Q. And you make various observations about that, some of
22 which I'll come back to.

23 A. Yes.

24
25 Q. Then a bit further on, "What is its applicability"?

26 A. Yep.

27
28 Q. And then a bit further on again, "How are indicators
29 or factors weighed or scored?"

30 A. Yep.

31
32 Q. In that section, which goes for a page and a half, you
33 set out at least some of the problems that you identified
34 with the form?

35 A. Yes. Some of them, to the best of my recollection,
36 yep.

37
38 Q. Yes, so you identify a few and then you point out, or
39 you observe, that Professor Lovegrove had identified some
40 more?

41 A. Yep.

42
43 Q. And then in the paragraph below that beginning, "As he
44 observes" - have you got that paragraph?

45 A. Yes.

46
47 Q. Which is Professor Lovegrove - so you seem to be

1 agreeing with what he is saying - and you add:

2
3 *As he very helpfully suggests, since they*
4 *describe circumstances in very gross*
5 *dimensions that may just as easily describe*
6 *non-bias homicides this leaves a great deal*
7 *open to subjective interpretation*
8 *concerning the attribution of hate crime in*
9 *the particular case.*

10
11 A. Yep.

12
13 Q. You are agreeing with Lovegrove in that regard?

14 A. Yeah, basically, well - yeah.

15
16 Q. Just while I'm on that, in the very next paragraph you
17 suggest that perhaps Professor Lovegrove's opinion is not
18 shared by Ms Coakley or Professor Asquith, but you then
19 say:

20
21 *... it is worth repeating that whilst the*
22 *instrument may be adopted widely, that wide*
23 *adoption is not evidence of its fitness for*
24 *purpose.*

25
26 A. Right.

27
28 Q. Why do you say that the instrument - if you are
29 saying - had been adopted widely?

30 A. Well --

31
32 Q. The instrument, not the indicators but the instrument?

33 A. Well, I'm talking - yes, I'm talking - well, not this
34 form that the NSW Police developed, but the underlying --

35
36 Q. That's the point of my question. That's what I want
37 to make sure you're understanding.

38 A. Yeah, yeah.

39
40 Q. You say the instrument has been adopted widely, being
41 the form. But that's not so, is it?

42 A. No, not this instrument - not this instrument, no, no,
43 that's right.

44
45 Q. No. In fact, could I suggest to you that it has never
46 been used before or since, to your knowledge?

47 A. Yeah. The nine indicators, you know, are part of -

1 are drawn from the instrument that I'm --
2
3 Q. Well, they're drawn from a curriculum in the United
4 States --
5 A. Yes.
6
7 Q. -- which is a teaching curriculum?
8 A. Yes.
9
10 Q. Correct?
11 A. Yes.
12
13 Q. Is that right? So they're drawn from a document, but
14 one would hardly call it an instrument?
15 A. Right, yep. Well, I think we're - I think I'm trying
16 to - what we're talking about, I think - I'm not sure we
17 are - are the specific indicators and whether they - and
18 the values as well, so if - so Levin and McDevitt developed
19 a paper, developed a set of - a taxonomy, and that taxonomy
20 generated into a form, McLaughlin et al, you know.
21
22 Q. Well, a list of indicators?
23 A. Developed a list of indicators out of that. I think
24 that the difficulty - and so we can talk about the
25 difficulty of that genesis.
26
27 Q. Sure. I don't - this is not purely nitpicking --
28 A. No, I understand.
29
30 Q. -- I just want to make sure you understand the
31 distinction I'm going to draw --
32 A. Okay.
33
34 Q. -- between the 10 indicators, on the one hand --
35 A. Yeah.
36
37 Q. -- and the form or instrument, on the other hand,
38 which has much more in it than just the 10 indicators.
39 A. Yes, yes.
40
41 Q. So you are following what I'm putting?
42 A. Mmm.
43
44 Q. All right.
45
46 THE COMMISSIONER: Q. Is the answer to that question,
47 yes, you are following what he is putting?

1 A. I think so.
2
3 Q. He is drawing a distinction between the verbiage
4 which, in part, are indicators, burning crosses, et cetera,
5 et cetera --
6 A. Yes.
7
8 Q. -- and the precise form which was used by the police
9 in this case, which, as I think - I think you have
10 acknowledged, has much more information contained in it and
11 many more questions than indeed the indicators themselves?
12 A. Right. Sure, yes.
13
14 Q. So he's drawing the distinction between the text of
15 the indicators, as it were, and the indicators in the
16 context of the additional questions in the form used by the
17 police.
18 A. Yes.
19
20 Q. He's describing the latter as an instrument. Are we
21 on the same page or not? Are you going to say, "I think
22 so", are you?
23 A. So sometimes I get a bit of a mental fog, sorry.
24
25 Q. Let's get rid of the fog and I will let Mr Gray ask
26 you again. But he is drawing the distinctions as I have
27 tried to, perhaps badly, point out, between the term of the
28 indicators identifying areas of possible discrimination and
29 bias, as opposed to those independent indicators embedded
30 in the particular form used by the police with the
31 additional words and questions and prompts used?
32 A. Sure, sure, okay.
33
34 Q. That's the instrument, the latter, the corpus of what
35 I have just described is the instrument he is talking
36 about?
37 A. The latter is the instrument.
38
39 Q. Yes.
40 A. Okay.
41
42 MR GRAY: Q. In other words, the instrument is the form,
43 being the form attached as an appendix to your report.
44 That's the instrument. Do you follow?
45 A. Okay, yeah.
46
47 Q. Now, did you tell the police that the form or the way

1 it was being used by the police had all these flaws that
2 you have identified in both the report and in your response
3 document?

4 A. This? Not that I - not that I'm - I do recall some
5 conversations with the police with respect to the
6 difficulty of following - you know, filling the form in the
7 way that they were - in the way that they were suggesting.
8 Yes.

9
10 Q. Well, wasn't it your view - tell me if I've
11 misunderstood - that because of all these flaws in the
12 police methodology, their overall approach was at least to
13 some extent misconceived in embarking on this task?

14 A. I think "misconceived" is a strong word. You know,
15 having looked at some of the criticisms of the Levin and
16 McDevitt, and McDevitt et al, research with respect to
17 this, the elements of their form, I think it may be a very
18 difficult task to develop a form which has the requisite -
19 the kind of requirements that, for instance, Austin
20 Lovegrove would prefer to set it at. I think that's -
21 that's - that's why I'm a little bit hesitant now,
22 currently --

23
24 THE COMMISSIONER: Q. Doctor, I'm so sorry, you're not
25 being asked about theoretical questions.

26 A. Okay.

27
28 Q. You're being asked about the precise instrument?
29 A. Yes.

30
31 Q. And the precise instrument - leave aside whether it
32 would be in your view unattainable --

33 A. Yes.

34
35 Q. -- namely, Professor Lovegrove's ambition being
36 unattainable, leave that to one side?

37 A. Okay.

38
39 Q. You're being asked about this form. So could you just
40 focus on this form for the moment.

41
42 Mr Gray?

43
44 MR GRAY: Q. The question I'm putting really is wasn't
45 it your view that because of these various flaws in the
46 form and in the way the police were using the form, that
47 their methodology was compromised from the start, the

1 methodology was not capable of delivering the outcome that
2 was needed?
3 A. I don't know that - did we say that? I don't --
4
5 Q. I'm putting - I'm asking you if that was your view?
6 A. I don't remember saying that.
7
8 Q. No, I'm asking if that was your view?
9 A. No, that would be too strong.
10
11 Q. Well, tell us what your view was in relation to the
12 form, the instrument, in the light of your having
13 recognised all these flaws or problems or shortcomings with
14 it?
15 A. Mmm-hmm. That in trying to review the material that
16 we were reviewing, we found it very difficult to follow
17 along with the - in the - with the constraints of that
18 form, to come up with a - with a determination.
19
20 Now, we were - at the time, we were fixated on this
21 question of, "Well, when did the scales tip, and is the
22 form helping us to establish when the scales tip so that we
23 have a bias crime?" And we didn't feel that the form was
24 helping us, you know, to determine where the scales tip and
25 now we can say, "Tick, there's a bias crime".
26
27 THE COMMISSIONER: Q. Why not? Why not?
28 A. Well, because - and this is in somewhat retrospect,
29 I don't know at the time that I was thinking this, I can't
30 say for sure, but it's - there may be one item which is
31 sufficient to tip the scales in a context, and that item in
32 a different context will not tip the scales. The
33 configuration of a context or the factors and the
34 significant experimental item are so various and so
35 multitudinous in their arrangement that I now think it's
36 very difficult to develop an instrument, but I'm going too
37 much --
38
39 Q. I'm sorry, Doctor. We're not interested in whether or
40 not there are difficulties. We really are - I am
41 particularly interested in what was your problem with the
42 form and why didn't it deliver, from your point of view,
43 satisfactorily the answers or the information that you
44 thought you needed?
45 A. Primarily because it didn't articulate the relation
46 with bias and the - that each - the elements of a bias
47 crime, to my mind, needed to be placed on some kind of

1 a meaningful set, a meaningful taxonomy, and I didn't see
2 a meaningful taxonomy when we were using the instrument.
3 Now --

4
5 Q. Sorry, no, no, stopping there, please. When you say
6 you didn't see a meaningful taxonomy, precisely what do you
7 mean?

8 A. Well, because - so we have these various elements,
9 and - for instance, gang members of - even motive was in
10 there, a lack of motive, as an example. And to me that's -
11 so it almost looks like it's brought out of somewhere but
12 where I don't know. How motive relates to other features
13 or elements of a crime that is bias crime is not clear. So
14 it - so I think I needed a sort of a meaningful taxonomy in
15 order to identify --

16
17 Q. I'm going to ask you again. You've given one example.
18 Would you like to see the form for the purposes of pointing
19 out what you say was not the meaningful taxonomy? It's
20 fair, I think, if you go to the form. Perhaps Mr Gray
21 will --

22
23 MR GRAY: Page 121 of that.

24
25 THE COMMISSIONER: Just go to that and by all means go
26 through each of the questions or prompts and help me
27 understand what it is when you say at a general level, as
28 I understand you to be saying, that it didn't provide
29 a meaningful taxonomy. Just make sure we've got the right
30 tab number.

31
32 THE WITNESS: Where am I?

33
34 MR GRAY: It should be exhibit 1, tab 2.

35
36 THE COMMISSIONER: Can someone just check --

37
38 THE WITNESS: I don't think I have --

39
40 THE COMMISSIONER: Could someone help Dr de Lint find the
41 document.

42
43 Q. Perhaps get rid of the other folder for the moment,
44 just to clear the decks, and then if you go to tab 2,
45 hopefully, of that folder.

46 A. Page?
47

1 MR GRAY: Q. Page 121.

2

3 THE COMMISSIONER: Q. Just before you go to it, can
4 I ask you a couple of preliminary questions. In your
5 involvement in the Parrabell exercise, was this the first
6 time you had ever seen such a form as this?

7 A. I think there is something along - along these lines
8 related to terrorism.

9

10 Q. Okay. But you had seen some similar types of
11 questions --

12 A. Yes.

13

14 Q. -- or a similar form in the terrorism context?

15 A. Yeah.

16

17 Q. Is that right?

18 A. I think so.

19

20 Q. Okay. And - all right. Thank you. Now, if you go to
21 the page that has been suggested, I'll let Mr Gray ask you
22 the questions, but I'm interested in content in the comment
23 you made a few minutes ago that it didn't provide
24 a meaningful taxonomy.

25

26 MR GRAY: Q. So can you tell us what you mean by that
27 with reference to the form itself? How did it fail to
28 provide a meaningful taxonomy?

29 A. Well, so bias crime is a message crime, and so one can
30 break down messaging. And so that - that sort of provides
31 some sense of taxonomy because you think, well, you know,
32 "Comments, written statements, gestures" - well, you know,
33 what's the point of that? Well, the point of that is that
34 there is a messaging of bias. So you're trying to fit
35 elements into a rubric, and so that's - so I understand -
36 you know, "Drawings, markings, symbols, tattoos", again
37 messaging, right? "Communication, organised hate groups",
38 right? "Victim/witness perception", okay? You know,
39 obviously it's important, you know, how does it fit in.
40 Well, it's - you know, as I say, it's --

41

42 THE COMMISSIONER: Q. What I'm going to do is this,
43 Doctor. It's after 1 o'clock. I'm going to adjourn for
44 the luncheon break. By all means, if you would like to
45 have a look at that form over the luncheon break, and would
46 you please take away with you the question - namely, your
47 response a few minutes ago, that you did not think it

1 provided a meaningful taxonomy?

2 A. Yes.

3

4 Q. Would you come back with that focus, and by all means,
5 we will provide some arrangement for you to have a look at
6 that document. Would it help you to have a more careful
7 look at that document over the break?

8 A. It might.

9

10 THE COMMISSIONER: It might? Well, let's just hope that
11 it might, in which case, might you have a look at it, and
12 we will come back to it shortly after 2. Thank you.

13

14 **LUNCHEON ADJOURNMENT**

15

16 THE COMMISSIONER: Dr de Lint, would you be kind enough
17 just to come back into the witness box, thank you very
18 much.

19

20 Yes, Mr Gray.

21

22 MR GRAY: Q. Now, Dr de Lint, before lunch you were
23 asked some questions, some of them by the Commissioner,
24 about why it was that you found the BCIF not to provide
25 a satisfactory taxonomy.

26 A. Yes.

27

28 Q. What can you tell us about that?

29 A. With a taxonomy, you break the phenomenon down into
30 types, usually some kind of division of types. And then
31 you further break that down into maybe crime elements,
32 elements that are necessary and sufficient, I suppose, for
33 the completion of the type in the - and the crime, and then
34 you break that down further into various characteristic
35 indicators, along each type - into each type.

36

37 And so that allows you to cluster that information
38 logically from a definition or an understanding, mutual
39 understanding of the phenomenon, into its constituents,
40 broader constituent parts and into narrower constituent
41 parts, actually. That's what a taxonomy is.

42

43 Now, if - and it's not that difficult to see how this
44 may have been derived, you know, from a taxonomy, but the
45 evidence of that taxonomy is not clear in this instrument
46 as it - as it was provided to us.

47

- 1 Q. The evidence of the taxonomy?
2 A. Of the taxonomy, yes.
3
4 Q. What would the evidence of the taxonomy be?
5 A. The clustering of those characteristics into those
6 types or into those elements.
7
8 Q. In the blank template we're talking about, before it's
9 filled in?
10 A. Before you have this blank template of just
11 indicators, you've got a - you've got a grouping of these
12 indicators - prior to that you have a grouping of the
13 indicators by type and then elements.
14
15 Q. You mean you should have?
16 A. You should have.
17
18 Q. But this didn't have that?
19 A. Doesn't have it.
20
21 Q. And that's a defect from the get-go, is it?
22 A. Yes. Well, it makes it very difficult to understand
23 the logic, when you're filling in the information.
24
25 Now, it's not that it's impossible, but for me, as
26 a person who likes to have an organisation of materials,
27 a logic to the development of the material, it made it very
28 difficult. It made it very difficult and it made it - and
29 the other thing about a taxonomy is it should not be - the
30 characteristic parts or the types should not be redundant;
31 they should be discrete to the --
32
33 Q. They shouldn't overlap, do you mean?
34 A. They shouldn't overlap. And not all typologies do
35 that. Some are - some fail in that requirement, and that
36 causes more difficulty for the --
37
38 Q. Was the effect, in your mind of those flaws or
39 defects --
40 A. Mmm-hmm.
41
42 Q. -- such that you felt the form was not realistically
43 useable?
44 A. It was, for us, more difficult to use it than to
45 devise an alternative.
46
47 Q. But for them, the police?

1 A. I can't speak for them.
2
3 Q. Why not?
4 A. Because I wasn't using the form as an officer or an
5 investigator. If I was, yeah, possibly I would say, well,
6 if - besides, I'm a social scientist, so these things are
7 different for me, I have a different context or
8 perspective.
9
10 Q. Let me approach it from this perspective. Could
11 Dr de Lint please have volume 12. I'm going to show you -
12 yes, that one could go back for the moment. Would you turn
13 to tab 256 [SC0I.82366.00001_0001]. This is the report of
14 Professor Austin Lovegrove, which I know you've
15 read - you've read this?
16 A. I have not read the report in its - have I read the
17 report in its entirety? I think so.
18
19 Q. You've provided a document in response to it?
20 A. Yes, but I did not - yes, I did - as a response to
21 elements of it that I - that I thought were elements that
22 I wanted to respond to.
23
24 Q. So you haven't read the whole Lovegrove report?
25 A. I think I - I'm tempted to say I have read the whole
26 thing but I - you know, I'm hedging my bets there. Yeah,
27 I don't know - I think I've read the whole thing but
28 I don't know for sure.
29
30 Q. What about the report of Professor Asquith; did you
31 read that?
32 A. Yes.
33
34 Q. You read that?
35 A. Yes.
36
37 Q. And Ms Coakley?
38 A. Yes.
39
40 Q. So you read those two but you're not sure if you read
41 Professor Lovegrove?
42 A. I'm not sure if I read the complete - the whole
43 report. Maybe I have.
44
45 Q. In your response document that you submitted a few
46 weeks ago, or a couple of months ago --
47 A. Yeah.

1
2 Q. -- you referred in various places to
3 Professor Lovegrove's report --
4 A. Yes.
5
6 Q. -- and as I read what you wrote in that document, you
7 were largely, if not entirely, accepting of various things
8 that he said?
9 A. Yes, some things that he said I was accepting.
10
11 Q. Well, I didn't notice you not accepting any of it.
12 A. Well, I didn't necessarily respond to all of the - all
13 of the report that I would not have accepted.
14
15 Q. Even though you were asked to put in a - or invited to
16 put in a response?
17 A. No - well - sure, yes, even although that, yes. Very
18 much so.
19
20 Q. Well, let me just show you the summary part of what he
21 has to say about the form. He says - this is
22 a capitulation of his views. If you turn to page 27 at
23 paragraph 102 he says - and he's talking about the police
24 methodology, including the form, and he sets out the
25 following conclusions; do you see that at 102?
26 A. Yes.
27
28 Q. When we get over to 104, he offers the view that the
29 choice of the form was not soundly based and cannot be
30 taken to be adequate. He gives some reasons. Would you
31 read that paragraph and tell us if you agree.
32 A. Yes, I agree - I don't know that it needed to - well,
33 yes, I agree.
34
35 Q. Thank you. In 105, he points to the different
36 standards of proof applicable to different parts of the
37 form, and you no doubt are aware that, as I did mention to
38 you this morning, for the first indicator - sorry, the
39 first criterion, "No Bias Crime", the "beyond reasonable
40 doubt" standard is embedded in the option?
41 A. It is embedded in the form, yes.
42
43 Q. Yes, and later in the form - later in the form, and if
44 you don't recall this I will show it to you - another part
45 of the process is said to be needing to be dealt with by
46 the civil standard - that is, balance of probabilities.
47 Just assume for the moment that that's so. What

1 Professor Lovegrove is saying is that having different
2 standards of proof in different parts of the process is
3 problematic. Would you agree with that?

4 A. I would tend to agree that the standard should be the
5 same. I think that applying a standard of proof is
6 a difficult one but - yes.

7

8 Q. And he adds that the use of the standard beyond
9 reasonable doubt for assessments with respect to each of
10 the 10 indicators - that is, as to whether there was
11 evidence of bias crime or not - risked missing cases where
12 bias was actually present; do you agree with that?

13 A. Yeah.

14

15 Q. Then in paragraph 106, he says:

16

17 *The Strike Force adopted the [form] without*
18 *any evidence of its reliability and*
19 *validity.*

20

21 And he expands on that slightly in 106?

22 A. Yes.

23

24 Q. If you could read 106, could you then tell me if you
25 agree with that?

26 A. Yes.

27

28 Q. In 107 he says:

29

30 *With respect to validity, an analysis of*
31 *its face validity --*

32

33 and I interpolate alone --

34

35 *pointed to low validity.*

36

37 Now, appreciating this is a summary of views that he has
38 expressed at greater length earlier in the report, do you
39 agree with 107?

40 A. Yes.

41

42 Q. And at 108 he says:

43

44 *The preceding three problems render the*
45 *BCIF a crude instrument for present*
46 *purposes and the accuracy of any conclusion*
47 *about the incidence of bias very uncertain.*

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

Would you agree with that?

A. I'm not sure whether "very uncertain" or "uncertain" or "somewhat uncertain" would be the right description.

Q. Well, with the exception of which qualifier to apply to the word "uncertain", you would agree with what he says in paragraph 108; is that right?

A. Okay, yeah.

Q. And in 109 you can see that he says:

The Strike Force's reporting of their analysis of the case data is too obscure.

And:

This applies to the use of the BCIF in identifying gay hate as a factor ... and, with this, the process of classifying the cases according to the presence of bias.

And he identifies two consequences flowing, the first being the reader has no means of assessing the soundness or validity of the team's judgments; do you agree with that?

A. I would agree with it with a longer - a caveat, and that includes the subsequent point.

Q. What's the caveat?

A. Is there a tool that matches those requirements?

THE COMMISSIONER: Q. No, that is not the question, if I may say so.

A. Well, that's my caveat.

Q. No, no, no.

A. Okay.

Q. We are interested in this tool used by the police here, and insofar as it may be your view that it's simply not possible ever to devise such a tool is beside the point, from my point of view for the moment, it might emerge later. So would you go back to looking at it in the context of this tool in this strike force.

A. Okay, yeah.

MR GRAY: Q. So you agree with the point that he makes

- 1 in paragraph 109(1)?
2 A. Yes, it says "social science research project" - oh,
3 you are not talking about (2) yet.
4
5 Q. So is that the answer, yes, that you agree with what
6 he says in subparagraph (1)?
7 A. Yes.
8
9 Q. Then as to subparagraph (2) he says:
10
11 *It fails a basic requirement of a social*
12 *science research project, namely, the*
13 *opportunity for independent researchers to*
14 *replicate the actual study.*
15
16 A. Yes.
17
18 Q. You would agree with that, I take it?
19 A. Yeah.
20
21 Q. So at 110 he says, in his view:
22
23 *The pivotal role of the BCIF in this study*
24 *represents faux science; it imparts a false*
25 *sense of research rigour and validity.*
26
27 Would you accept with that?
28 A. Well, it's - I would again say that it's - is it
29 a scientific instrument? I would question that it's
30 a scientific instrument from the get-go.
31
32 Q. Does it impart a false sense of research rigour and
33 validity, given all the matters we've just gone through?
34 A. I don't know that it does. I don't necessarily think
35 that it's a false sense of rigour and validity. I think
36 the sense of rigour and validity that one gets from it is
37 quite plain.
38
39 Q. Go back to 109(1) and (2), which you have accepted as
40 correct.
41 A. As a social science research project?
42
43 Q. Mmm-hmm
44 A. I don't - it isn't a social science research project.
45
46 Q. Does it fail the basic requirement of a social
47 research project?

1 A. Yeah, it's - it isn't, in my view --
2
3 Q. I understand you're saying that, but does it fail the
4 basic requirement of such a project - namely, that an
5 independent researcher has no way of replicating it?
6 A. It fails the requirement that it isn't, as
7 I understand it, aspiring to be.
8
9 Q. No, you're not answering my question. Is it
10 a report - that is, the police report, using the form - one
11 which does not enable an independent researcher to
12 replicate the study and thus test its reliability?
13 A. Well, I disagree with the premise.
14
15 Q. What do you mean by that?
16 A. It's not a social science research project.
17
18 Q. I've taken that out of the question.
19 A. Okay.
20
21 Q. I'll put the question again. Whether it's accurately
22 characterised as a social science research project or
23 not --
24 A. Mmm-hmm.
25
26 Q. -- given the flaws with it which I have taken you
27 through from 104 through to 108 --
28 A. Mmm-hmm.
29
30 Q. -- is it the case that the police side of the
31 exercise, employing the form, is an exercise where no
32 independent researcher would have been able to replicate
33 the actual study? It is unverifiable in that sense?
34 A. Yes.
35
36 Q. Right. Well, that imparts a false sense of research
37 rigour and validity, doesn't it?
38 A. I think there are different standards in terms of
39 research, and you need to place a particular instrument
40 within, I suppose, the community of devices that are
41 relevant or appropriate for that type of instrument, and
42 I think that those standards that Professor Lovegrove is
43 wishing the instrument to meet are exceedingly difficult
44 for many research projects in social science.
45
46 THE COMMISSIONER: Q. That may be so, but insofar as it
47 clearly isn't, from your vantage point as a social

1 scientist, a social science tool, then insofar as it
2 purports to give the appearance of rigour and validity, it
3 simply can't, because it is not a social science tool; it's
4 a crude implement - isn't that the position?

5 A. I don't know that it's purporting to be such.

6

7 Q. Not to you, but if someone looked at it and looked at
8 the form, they'd be entitled to think, wouldn't they, that
9 the police were undergoing a process by which they were
10 interrogating their files in order to provide empirical
11 data?

12 A. Yes.

13

14 Q. And insofar as it gives that impression, it clearly,
15 by reason of the fact that it requires such a degree of
16 subjectivity, is not producing empirical data at all; it's
17 producing opinion after opinion of a particular police
18 officer?

19 A. Now, for example --

20

21 Q. No, please --

22 A. Well, I would say no, I would disagree with that,
23 then.

24

25 Q. You would disagree?

26 A. Yes.

27

28 Q. But you were reluctant to endorse the indicators?

29 A. As I explained, because you asked me to talk about
30 taxonomies and why it was that we had difficulty using the
31 instrument.

32

33 Q. Well, you say in footnote 20 you were reluctant to
34 endorse the indicators?

35 A. Yeah.

36

37 Q. Why?

38 A. One, because it was not clear to me, as I described
39 before, what the relationship was between the
40 characteristics, the elements and the typology and then the
41 definition. That thread of relationship is not clear,
42 looking at the way that this instrument is laid out. So
43 that was one of the reasons that I'm reluctant to endorse
44 it.

45

46 The other - the difficulty that I'm having, and
47 I don't know if anybody else has it, but - is that in some

1 social science, what occurs is a concordance. So instead
2 of what Professor Lovegrove is talking about which is, you
3 know, looking at each item as an element and looking and
4 testing it in terms of reliability and validity, what
5 occurs is a more crude method, which is these - and it's
6 referred to by Geoffrey Steer in the term "aide-memoire".
7 What is used is a device to cover, as much as possible,
8 each of the possible universe of characteristics that are
9 related to bias crime.

10
11 Discovering these and discovering them with equal -
12 equally amongst various people in various - from various
13 different - I suppose, with various different expectations,
14 may produce some concordance over the attribution of that
15 as a - as significant enough to be worthy of a judgment
16 that the criteria has been met.

17
18 Q. The basis ultimately of each of these forms was to
19 procure, in effect, anecdotal material, wasn't it?

20 A. I would not characterise it that way, no.

21
22 Q. How would you describe it? It's putting together, by
23 reason of different prompts, different parts of the
24 narrative, isn't it?

25 A. Yes.

26
27 Q. Detected by the police officers?

28 A. Yes.

29
30 Q. So insofar as what it's doing at various points along
31 the way by reference to individual - for example, we know
32 there were no burning crosses, we know perhaps where that
33 comes from. But the reality is each of the prompts was
34 producing no more or no less than the subjective view of
35 the police officer as to the particular part of the
36 narrative that fitted that interrogatory?

37 A. I think that --

38
39 Q. Would you like to answer the question, please?

40 A. Well, no, I don't think that it's anecdotal.

41
42 Q. Okay. So the police officers were doing what, over
43 and above, just extracting at various points by reason of
44 the prompts, aspects of the narrative or the anecdotal
45 material, historical, concerning the individual case?

46 A. Perhaps if you might repeat the question, I --

47

1 Q. Well, the individual prompts, as you have seen from
2 the forms, one of which you were shown this morning,
3 produce different permutations and combinations factually
4 of the narrative surrounding the particular death?

5 A. Yes, maybe.

6

7 Q. Well - okay, in some instances, the burning cross
8 issue, which I'm asking about too much, perhaps, is crossed
9 off - pardon the pun - because it doesn't arise. But some
10 of the questions, all they merely did, from the forms you
11 saw, was not only produce a narrative or a portion of the
12 narrative but often no more than a repetition of the same
13 narrative?

14 A. Right. Yep.

15

16 Q. That was your impression of what you saw?

17 A. Yeah, yeah.

18

19 Q. And so, therefore, what the police officers were doing
20 were using the prompts, sure. But all the prompts were
21 doing were the police officer's view as to which part of
22 the narrative might be a relevant response to that prompt?

23 A. Okay, yes. In terms of how the - okay, so part of my
24 answer would be that - yes. But does the use of the tool
25 require that result from the user? In other words, if the
26 police were doing that with this particular tool, does the
27 tool always generate that response from the user?

28

29 Q. Well, because it's subjective, you would have to,
30 wouldn't you, say most likely it would not provide
31 a rigorous response, because one police officer's view of
32 the narrative or the appropriate response to a particular
33 prompt may be a different view, subjectively, to another
34 police officer's view?

35 A. Well, yes. May I say that as long as in the initial
36 investigation, or in a reinvestigation, or what have you,
37 all of the relevant elements of that narrative have been
38 recorded, then - and as long as those relevant elements
39 that have been recorded will then be reflected in the
40 document produced in the BCIF, then you have at least one
41 element of what you need, which is the experimental value.

42

43 Q. And whether it's relevant or not, you were entirely
44 dependent upon the choice by the police officer as to
45 relevance?

46 A. Yes, we would - yes. We would - we assumed, and we
47 may have been wrong, but we made that assumption, that all

1 of the - the key elements - so in other words, even if this
2 form was used by somebody who didn't really have very good
3 instructions, and, in fact, the form is difficult to use
4 even with someone with good instruction, they nevertheless
5 captured what any bias crime investigator would want to
6 capture in terms of those - for those characteristics. So
7 as long as the - those characteristics were captured and
8 found their way into the narrative, how they were sprinkled
9 around this document wouldn't have concerned me that much,
10 I suppose you could say.

11

12 MR GRAY: Q. Does that mean, though, that in terms of
13 what the police were doing, as distinct from what you were
14 later doing in looking at what they had done, in terms of
15 what they were doing, really, they weren't, in effect,
16 using the form at all; they were just selecting from the
17 papers available to them relevant bits generally to what
18 might have something to do with bias crime?

19 A. I would tend to agree with that.

20

21 Q. Right. Well --

22 A. Now, but --

23

24 Q. Doesn't that suggest - sorry, you go on.

25 A. Again, so what you want to capture with your device -
26 like, let's say your device is some kind of, I don't know,
27 like a fly trap, you know, as long as your device is
28 catching the flies that are out there, despite that, you
29 know - despite how it does it, if it does it very crudely,
30 and in a very problematic way, as long as that elemental
31 fly is in the trap and you can sort out that, well, it's
32 there, then, you know - and this goes against the social
33 science question as well - well, what's the purpose of the
34 science? What's the purpose of it? Have you just - you
35 know, do you have some confidence that you have discovered
36 it? Well, that has to do with whether or not the
37 individual officer at the crime, or subsequently with a
38 homicide, or subsequently after that, has scanned the
39 elements to ensure that they've discovered that
40 experimental value.

41

42 Q. Yes.

43 A. And if that has happened, then you're okay. If it
44 hasn't happened, whatever template you're using, you're
45 going to be lost.

46

47 Q. But on this template, given that your sense is that

1 that's probably what happened, then the whole apparatus of
2 the form was basically irrelevant?

3 A. It's not irrelevant, because - and this is why the
4 prompts are irritating to me, prompts are important, and
5 they should be set out in a structured way so that people
6 are prompted for the purposes that they need to be
7 prompted, but prompts are valuable.

8
9 Now, you know, if it's in the narrative and there's
10 a prompt, you can tease it out of the narrative, that has
11 a value.

12
13 Q. All right. Let me put this to you: given that your
14 sense is that that's what they did, that only emphasises
15 even more the reality which you yourself have pointed to in
16 your document that, really, in the end, they were simply
17 reading the old material and expressing an opinion
18 subjectively as to whether it was in or it was out of one
19 of these categories?

20 A. They were - they were - no, I don't think they were -
21 yes - well, subjectively - let me - let me say this: if
22 you tease out the - if you tease out the element, it's
23 called the experimental value, which is the bias, the
24 indication of bias crime, then basically - and the tool
25 helps you, assists you in teasing out that element and
26 putting it - and placing it in front of another person,
27 then that - then that is, you know, primarily the value of
28 the tool, I suppose.

29
30 THE COMMISSIONER: Q. Sure. But the plain reality -
31 let's address the reality - you could not endorse the
32 indicators and you invented your own categories by reason
33 of the inadequacy of the indicators that were being used?

34 A. Okay.

35
36 Q. No, not "okay".

37 A. May I answer that --

38
39 Q. Would you please answer that question. You could not
40 endorse the indicators, and I'm reading from footnote 20 --

41 A. Yeah.

42
43 Q. -- and you didn't say, "We'll use a little bit of the
44 form for this reason and a little bit of the form for that
45 reason". What you then did was to say, "We can't use the
46 indicators, there's no academic support or literature, it's
47 not best practice, and so we need, in order for us to do

1 our job, to invent a different set of components or
2 characteristics"?

3 A. I would like to elaborate on that.
4

5 Q. I'd like you to answer the question first then you can
6 elaborate.

7 A. If you are quoting what we said before, of course,
8 that's --
9

10 Q. Well, do I misquote you?
11 A. That's true, then.
12

13 Q. Do I misquote you?
14 A. No, I'm not saying you are.
15

16 Q. Therefore, let's go back over it. You couldn't
17 endorse the indicators. There was no literature they could
18 supply. You were surprised, you say in footnote 20, to
19 discover there was no academic literature at all in support
20 of the form. You didn't pick little bits out of it, you
21 used the narrative, clearly, that you got from the police,
22 or narratives, and you had your own categorisation for the
23 purposes of achieving what you thought needed to be done?
24 A. Well, there's more to it than that, but yes.
25

26 Q. Well, when you say, "there's more to it than that, but
27 yes", is that not an accurate description of precisely what
28 you did? You couldn't endorse the indicators; you then go
29 on to perhaps look at the summaries that you were provided
30 with; but you devise your own categories to answer the
31 question, whether gay hate bias is present or not?
32 A. We placed some of those indicators, we understood
33 those indicators, some of those indicators to be valuable.
34

35 Q. Doctor, I'm terribly sorry to persist and maybe in
36 your neck of the woods it's not capable of concise answer,
37 but I'm reading your terms:
38

39 *The academic team are reluctant to endorse*
40 *the indicators.*
41

42 A. Yes.
43

44 Q. You didn't use those indicators, you invented -
45 I don't put that pejoratively - you devised your own
46 categories, did you not?
47 A. Yes, we were reluctant to endorse the indicators.

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 you didn't use them; you used your own categories, all right?

A. Yes.

THE COMMISSIONER: Mr Gray, you take over.

MR GRAY: Q. Just on subjectivity, in that same volume you've got, could you turn to tab 258 [SC01.82365_0001], which is your response document. On my copy it's the second page but it's under a heading "C. Evaluation and Evaluation Tools". You see the paragraph beginning "The evaluation of bias crime by police"?

A. Oh, I've got - yeah.

Q. You say:

The evaluation of bias crime by police for purposes of recording crime and otherwise is fraught. It is dependent on subjective evaluation or non-objective consensus or concordance-seeking devices?

A. Yes.

Q. That's, as I understand it, something that you are applying to the Bias Crime Indicators Form, which is something you have talked about in the preceding paragraph; correct?

A. Yes.

Q. You're saying that's a problem with the form and it requires - it's dependent on subjective evaluation?

A. Well, it's - more general than that.

THE COMMISSIONER: No, please.

MR GRAY: Q. Read the previous paragraph.

THE COMMISSIONER: Q. I really - Doctor, you chose, did you, on your own, the words in this response document?

A. Right.

Q. And it says at the very front that they were endorsed by Associate Professor Dalton?

A. Yes, it does.

1 Q. What does that mean? Did he read them and discuss
2 them with you?
3 A. Okay. Which question am I answering --
4
5 Q. You're answering my question, and I'm asking you this
6 document is in your words?
7 A. Yes, yes.
8
9 Q. All right. And at the very beginning of it - I'll
10 come back to this paragraph in a minute --
11 A. Okay.
12
13 Q. -- it says:
14
15 *This response is written by Willem de Lint*
16 *and endorsed by Associate Professor Dalton?*
17
18 A. Yes.
19
20 Q. All right. So I'm assuming you gave him a draft. You
21 discussed it?
22 A. I gave him a draft to read.
23
24 Q. Did you discuss it?
25 A. No.
26
27 Q. And he wrote back and said either, "I'm happy with
28 it", or "These are some changes"?
29 A. Yes. He said, "I'm happy". He didn't say, "Here are
30 some changes."
31
32 Q. All right. Come back to the paragraph you've been
33 asked about now and Mr Gray will ask you some more
34 questions.
35
36 MR GRAY: Q. Now, the top section begins:
37
38 *As described in our report ... the [form]*
39 *is a version of a tool created ... [in]*
40 *Massachusetts ...*
41
42 For the reasons I have mentioned, that's not quite
43 accurate. It does include nine indicators from
44 Massachusetts.
45 A. Yes.
46
47 Q. But the Massachusetts document is not a tool in any

1 relevant sense?

2 A. Okay.

3

4 Q. Then you say:

5

6 *The [New South Wales] form includes 9*
7 *[indicators] ...*

8

9 you say "from the BCIF", which is again wrong; you mean it
10 includes nine indicators from the Massachusetts document?

11 A. Yes.

12

13 Q. Plus a tenth, "Level of violence"?

14 A. Yes.

15

16 Q. Then in that context, immediately in the next sentence
17 you say:

18

19 *The evaluation of bias crime by police for*
20 *purposes of recording crime and otherwise*
21 *is fraught. It is dependent on subjective*
22 *evaluation ...*

23

24 et cetera?

25 A. Yes.

26

27 Q. Now, you are applying that, aren't you, to the form as
28 well as more generally?

29 A. That's what I wanted to say, yes.

30

31 Q. So - thank you. And you say:

32

33 *It requires --*

34

35 and I take it you mean the evaluation of bias crime
36 including by this form:

37

38 *It requires but cannot deliver on an*
39 *objective weighing of the role of all*
40 *necessary and sufficient factors ...*

41

42 A. Yeah.

43

44 Q. Right. So I will put it to you again, if I may, that
45 the actual reality of what the police were doing, whatever
46 usefulness there may or may not have been from prompts in
47 the form, was to extract from the material they had

1 historically that which they thought had something to do
2 with, relevantly to bias crime being present or not, and
3 then to express an opinion, subjectively; isn't that what
4 they did?

5 A. Yes, they developed a view of the case using the
6 prompts related to the indicators, which spring from the
7 nine indicators plus the one that they added.

8
9 Q. Yes. And, having done that, they expressed a series
10 of subjective opinions?

11 A. Yes, or they - or they made a determination following
12 from that exercise.

13
14 Q. Subjectively, in their minds. I'm not suggesting they
15 were doing it --

16 A. Well, now, we need to talk about what "subjective
17 means, I suppose.

18
19 THE COMMISSIONER: Q. No, well, what did you mean by it
20 when you talked about it was dependent on a subjective
21 evaluation - your words?

22 A. Yes.

23
24 Q. Well, tell us what you meant.

25 A. Okay, so I may - I may be - what I should - what
26 I should say, individual --

27
28 Q. No, no, hang on a minute. I'm really - when you say
29 what you "should say", do you mean what you should have
30 said --

31 A. Should have said, yeah.

32
33 Q. -- as opposed to what you have said?

34 A. Yeah, should have said

35
36 Q. Okay, does that mean, then, you withdraw parts of the
37 paragraph commencing "The evaluation of bias crime"?

38 A. This is why I wanted to discuss what - "subjective" is
39 a - I used the word "subjective" --

40
41 Q. Doctor, I'm trying to be organised about this for my
42 own purposes at the moment --

43 A. Okay.

44
45 Q. -- and even for those who are trying to understand
46 what you're saying. Do you stand by the first two
47 sentences in the second paragraph under the heading "C.

1 Evaluation and Evaluation Tools"? And I will just so that
2 you know:

3
4 *The evaluation of bias crime ...*

5
6 et cetera, and the second sentence?

7 A. Well, yes, but - so some tools are concordance-seeking
8 devices --

9
10 Q. Now, Doctor --

11 A. Yes, okay.

12
13 Q. -- I'm terribly sorry --

14 A. Sorry, yes.

15
16 Q. -- I'm not just going to permit to you go off.

17 A. All right, yes.

18
19 Q. I'm asking you a direct question. You are here partly
20 because of your involvement in Parrabell. You are also
21 here because, on one view, of your expertise, okay? Now,
22 do you stand by those two sentences or not, or do you wish
23 to qualify them?

24 A. Yes, I'll stand by them.

25
26 Q. Sorry?

27 A. Okay, yes.

28
29 Q. No, no, look --

30 A. Yes, I stand by them.

31
32 Q. -- when you say, "Okay", I want you to be comfortable
33 that what you are saying "Okay" to is something that you
34 are carefully considering; okay? If you tell me that this
35 is not a careful consideration of a response, that's one
36 thing, but I would have assumed, having received it in the
37 form that it's in - maybe I'm wrong - I assume that you had
38 carefully considered every word of what you wrote, together
39 with all of the references you put at the end of it, or am
40 I wrong about that?

41 A. I have, and to that - to the - yes. Okay, yes, I -
42 I'll stand by it.

43
44 THE COMMISSIONER: All right, Mr Gray.

45
46 MR GRAY: Q. Well, to a similar intent, could we turn
47 over a couple of pages in your document, there's a heading

1 about two pages on which says "3. How are indicators or
2 factors weighed or scored?"

3 A. Yeah.

4
5 Q. And that goes for about a page and a half, so about
6 a page down into that, so it will be on page 5. We need to
7 scroll down further, a bit further still, and just go
8 another line or two, stop there. No, just back a bit,
9 thank you.

10
11 I took you to this before, if you have it open on the
12 page as well, it's probably easier but, anyway, you
13 yourself, in this section, are pointing out the unhelpful
14 and occasionally incorrectly designated nature of some of
15 the prompts and other features of the form, and then you
16 quote, or then you cite Professor Lovegrove pointing out
17 another set of problems; do you see that?

18 A. Yes.

19
20 Q. Then would you read to yourself the paragraph
21 beginning "As he observes" - just read that to yourself.

22 A. Yes.

23
24 Q. Now, again, I put to you that what you are again
25 accepting is that the police method involved, in the end,
26 a great deal of subjective interpretation on the part of
27 the officers working on a particular case - these are your
28 words?

29 A. Yep.

30
31 Q. So you agree?

32 A. Yes.

33
34 Q. Right. Thank you. Now, on that same document - and
35 I hesitate to take the time that this might need - if you
36 go back a couple of pages to what is page 3 in the version
37 I have, under the heading of "What is the purpose of the
38 BCIF?", you say in respect of Martha Coakley that she has
39 put forward in her report five primary reasons for the use
40 of the tool - do you see that?

41 A. Yeah, yeah.

42
43 Q. Now, when one goes to the paragraph of her report that
44 you've cited, which is page 12 of her report, it's apparent
45 that she's not putting reasons forward for the use of the
46 tool; she's putting forward reasons for the use of the
47 indicators.

1 A. Yes.

2

3 Q. Now, given the discussion I had with you this morning,
4 do you accept that they are two different conceptual
5 things?

6 A. Okay.

7

8 Q. So the result is that your criticism of her, both in
9 this paragraph and in a couple of other paragraphs, for
10 supposedly saying this or that about the tool, is somewhat
11 misconceived, may I suggest, because in every
12 paragraph where you've done that, she has actually been
13 talking about not the tool, but the indicators?

14 A. Okay. I'll take that on, yes.

15

16 Q. Thank you. And --

17

18 THE COMMISSIONER: Q. When you say you'll take that on?

19 A. I - I hear it, I made a mistake and I appreciate your
20 pointing that out.

21

22 THE COMMISSIONER: Thank you.

23

24 MR GRAY: Q. Thank you. For example, if you scroll
25 down further there's a heading "What is its applicability?"
26 And go down to the next page. If we could scroll down
27 further, and further still, in the paragraph beginning
28 "Here, Martha Coakley" - just scroll back up again so we
29 can see what comes before, please. Thanks. You quote
30 Martha Coakley referring to the form in that bit that's
31 extracted, the quoted passage, and then you say that her
32 interpretation of the form is at odds with other views of
33 how the BCIF is to be used, and you say:

34

35 *For instance, it --*

36

37 and I don't know whether you are referring to the form
38 there, you seem to be --

39

40 *is also characterised as the "model*
41 *protocol for bias crime investigation."*

42

43 Now --

44 A. No, I'm not.

45

46 Q. I'm not sure where you've got that from, but you are
47 not saying that about this particular form?

- 1 A. No, I'm not, sorry. That's not --
- 2
- 3 Q. While we're at it, in the next sentence you say this:
- 4
- 5 *It may be observed that the term*
- 6 *"investigation" by definition refers to*
- 7 *cases that are in the process of being*
- 8 *"solved".*
- 9
- 10 Isn't an investigation a process that may or may not lead
- 11 to solving?
- 12 A. It's in the process of.
- 13
- 14 Q. Of being solved or not being solved?
- 15 A. Or of not being solved, sure.
- 16
- 17 Q. Yes.
- 18 A. If it fails in the process of being solved, it's not
- 19 solved.
- 20
- 21 Q. Now, move to your methodology. We need a different
- 22 folder now, we need exhibit 1, tab 2 [SCOI.02632_0001]
- 23 again. If we turn to page 92 of the Parrabell report,
- 24 there's a table there, or a graph, which summarises the
- 25 numerical results reached by the academic team; correct?
- 26 A. Yeah.
- 27
- 28 Q. And it's clear that you have used four categories:
- 29 one, "Anti-gay Bias"; two, "Anti-paedophile Animus"; three,
- 30 "Insufficient Information"; and four, "No Evidence of Bias
- 31 Crime"; correct?
- 32 A. Yeah.
- 33
- 34 Q. Now, in the police categories, they had different
- 35 categories. Number 1 was "Evidence of Bias Crime", we can
- 36 see that on the page before, page 91?
- 37 A. Yep.
- 38
- 39 Q. "Evidence of Bias Crime"; "Suspected Bias Crime" --
- 40 A. Yes.
- 41
- 42 Q. -- "Insufficient Information", and "No Evidence of
- 43 Bias Crime".
- 44 A. Yes.
- 45
- 46 Q. So the third and fourth of those are common to both,
- 47 "Insufficient Information" and "No Evidence of Bias Crime"?

1 A. Yes.
2
3 Q. But among other things, you don't have a category of
4 "Suspected Bias Crime" or anything similar; you don't have
5 a "Suspected" category, do you?
6 A. Yeah - no.
7
8 Q. You have - either it's in column 1 or 2, which is
9 "Anti-gay Bias" or "Anti-paedophile Animus"?
10 A. Yep.
11
12 Q. Or it's out altogether as "No Evidence"?
13 A. Yep.
14
15 Q. Or it's in the "Insufficient" category?
16 A. Yep.
17
18 Q. Was there a reason for leaving out that intermediate
19 category?
20 A. Yes. When we talked about it, we thought, well, for
21 us, if there is any indication that there is a bias crime,
22 that's sufficient. I think the police were trying to apply
23 their standard that you talked about, beyond a reasonable
24 doubt, and maybe that's why they had that distinction. We
25 didn't try to apply that standard.
26
27 Q. Okay. Let me ask you these things: elsewhere in your
28 report, about 10 pages earlier, page 82, you set out your
29 definition of "Bias Crime"; do you see at the bottom of 82
30 and up to the top of 83, with the (a), (b) and (c)?
31 A. Yep.
32
33 Q. So "Bias Crime" for your definition (a) expresses
34 a categorical animus directed at a person or group,
35 et cetera; (b) produces an act that intentionally, by way
36 of criminal predation, on the basis of that categorical
37 animus, causes harm to that person or group; and (c) is
38 mitigated or aggravated by an offender's contemporaneous
39 associations that are linked by a commitment of
40 denunciatory non-identification with the vulnerable person;
41 correct?
42 A. Yep.
43
44 Q. That's your definition of "Bias Crime"? Now, in the
45 next paragraph, when you begin your discussion about what
46 flows from your definition, you make it clear, in the third
47 line, that your subparagraph (a) of your definition of

1 "Bias Crime" requires that the act expresses an animus by
2 some form of communication --
3 A. Yep.
4
5 Q. -- correct? So if an act does not involve some form
6 of communication, it won't be a bias crime, on your
7 approach?
8 A. It can't be - it can't be discovered, I don't think,
9 if it isn't communicated.
10
11 Q. Right. So the answer to my question, accepting what
12 you say, is yes: if you cannot identify some form of
13 communication by the perpetrator, whether it's a degree of
14 violence or whether it's in utterances, statements,
15 gestures or other communications, then it's out; it can't
16 be bias crime?
17 A. Yeah, there - I think there's no way - otherwise, it's
18 a thought crime without any - without any way of relating
19 that thought, without any real way of discovering that
20 thought, because it hasn't been communicated.
21
22 Q. But if someone's killed someone, it's hardly a thought
23 crime, is it?
24 A. How would you know that the person who's killed
25 somebody is doing that because of a bias towards that
26 person?
27
28 Q. No, no, different question. You said if you can't
29 find a communication, it's only a thought crime?
30 A. There has to be some element, there has to be some
31 trace of communication.
32
33 Q. Or else what?
34 A. Or else you can't discover it.
35
36 Q. And so, can't be a bias crime?
37 A. If you can't discover it - if you can't --
38
39 THE COMMISSIONER: Q. Is the answer it can't be a bias
40 crime? I don't know why you keep qualifying what you're
41 about to say. Your position, as I understand it, is there
42 is a requirement of communication, and if there isn't one,
43 that's the end of it; it cannot be a bias crime because you
44 have no thought, statement, gesture, whatever it may be?
45 A. Yeah.
46
47 THE COMMISSIONER: Okay.

1
2 MR GRAY: Q. Well, that was inevitably going to result
3 in a low number of cases meeting your threshold, wasn't it?
4 A. I don't think so. Why?
5
6 Q. Well, for example, would it be difficult to find
7 a communication in the case of a body found at the bottom
8 of a cliff?
9 A. How - how would you determine that --
10
11 Q. No, my question, please.
12 A. Mmm-hmm.
13
14 Q. How would you find a communication where what you have
15 is a body at the bottom of a cliff?
16 A. If that body was pushed by somebody, that is more than
17 a gesture.
18
19 Q. That's the very thing that one doesn't know, though,
20 when all you have is a body at the bottom of a cliff?
21 A. That's right, well --
22
23 Q. But you're considering cases that were just a body at
24 the bottom of a cliff?
25 A. If that --
26
27 Q. And you - and, excuse me, according to your approach,
28 that immediately could not possibly be a bias crime because
29 there's no way you could divine any communication; correct?
30 A. If there was a communication, if that person was
31 pushed off that cliff --
32
33 Q. Sure, you could --
34 A. A push is a --
35
36 Q. Of course it is, but you couldn't know that, you
37 couldn't divine it, you couldn't discern it, could you?
38
39 THE COMMISSIONER: Q. Unless there was evidence to that
40 effect, you wouldn't know one way or the other, would you?
41 A. Yes, and if there was evidence then it would --
42
43 Q. If there was no evidence to that effect you wouldn't
44 know one way or the other, would you?
45 A. No, but it could still be a bias crime because that -
46 the communication could have taken place.
47

1 Q. Oh, okay, so theoretically, anything could be a bias
2 crime?
3 A. Not anything.
4
5 Q. I'm sorry?
6 A. It's one requirement.
7
8 Q. Well, I'm trying to follow what you're saying, and
9 I thought you said a moment ago there had to be
10 a communication, and if --
11 A. That's one - pardon, yes.
12
13 Q. I beg your pardon?
14 A. Yes, that's one element.
15
16 Q. Well, when you say it's one element, it's the first
17 requirement, isn't it, as described by you?
18 A. Yes.
19
20 Q. Do you mean it's cumulative? Do we go to others or
21 how do I consider what you are saying? I thought you
22 agreed a moment ago --
23 A. The expression about the degree of violence --
24
25 Q. No, please, please. I thought you said a moment ago -
26 please correct me if I'm wrong --
27 A. Yes.
28
29 Q. -- I thought you said a moment ago in answer to
30 a question by Mr Gray, if there was no form of
31 communication - read for that no words, no gestures,
32 nothing of the sort that you've identified - that would be
33 the end of it, it could not be classified thereafter as
34 a bias crime?
35 A. No, I don't agree with that.
36
37 THE COMMISSIONER: Okay.
38
39 MR GRAY: Q. Why not? I think the transcript --
40 A. Because --
41
42 Q. Excuse me. Just a second. I think the transcript
43 will tell us that a few minutes ago you did agree with
44 that.
45 A. Okay.
46
47 Q. And that's why I want to chase it up. I'll do it

1 again.

2 A. Yeah.

3

4 Q. In your page 80 --

5

6 MR TEDESCHI: Sir --

7

8 MR GRAY: Excuse me.

9

10 MR TEDESCHI: -- I object to the fact that this witness
11 hasn't been allowed to complete a single answer now for
12 about 10 minutes.

13

14 THE COMMISSIONER: I don't think that's right,
15 Mr Tedeschi. I think, as you well know, non-responsive
16 answers, it is always in the matter of the discretion of
17 the person hearing it as to whether it is non-responsive,
18 and you've taken no objection until now, and you take an
19 objection retrospectively. So I don't understand - I do
20 understand your objection, but I am in a position where, if
21 I think something is non-responsive, there's not one
22 suggestion here that this person is going to be stopped
23 from saying anything he wants to say, but he is obliged,
24 with respect, as anyone is, to answer directly.

25

26 MR TEDESCHI: Commissioner, with respect, it's very
27 difficult, with such complex area --

28

29 THE COMMISSIONER: I know it is complex, and that's why
30 I --

31

32 MR TEDESCHI: Could I please make a submission,
33 Commissioner?

34

35 THE COMMISSIONER: Sure.

36

37 MR TEDESCHI: It is very difficult with such a complex
38 area to know, after a few words that he is allowed to give,
39 whether it is responsive or not and --

40

41 THE COMMISSIONER: Mr Tedeschi, there is an element of
42 instinct, I accept. But the fact is if he is asked
43 a direct question and he doesn't purport to answer it, I am
44 entitled to insist that he answers directly and with the
45 caveat that if he needs to qualify it, either by my
46 inviting him to do so, Mr Gray inviting him to do so or you
47 ultimately inviting him to do so, he will be permitted to

1 do so.

2

3 MR TEDESCHI: I must say that my submission is that my
4 perception is that he is being prevented from providing
5 answers to questions.

6

7 THE COMMISSIONER: All right. Well, I don't see it that
8 way, but thank you very much.

9

10 MR GRAY: Q. At page 82 you set out what seemed to be
11 three components of your definition of "Bias Crime"; is
12 that right - (a), (b) and (c)?

13 A. Okay, yeah.

14

15 Q. Well, is that right? Don't say "Okay". Are they the
16 three components of your definition of "Bias crime"?

17 A. Yeah, yeah.

18

19 Q. Are they cumulative - that is, does bias crime, in
20 your definition, need (a) and (b) and (c) or is it
21 something else?

22 A. It needs (a) and (b).

23

24 Q. It needs (a) and (b), and then, as to (c), that might
25 mitigate or might aggravate?

26 A. Yeah.

27

28 Q. All right. So (a) is essential?

29 A. Yep.

30

31 Q. Right. And in the next paragraph you tell us a bit
32 about what (a) means and you say the first requirement --

33

34 which is expressed as a categorical animus is that the act
35 expresses an animus, and does so by some form of
36 communication directed at the target and, sometimes, the
37 wider population; correct?

38 A. Yes.

39

40 Q. And you expand that by saying that the expression in
41 question might be in the degree of violence, or it might be
42 in the utterances, statements, gestures or other
43 communications; right?

44 A. Yes.

45

46 Q. So aren't you saying very plainly that it is an
47 essential requirement of a bias crime, according to your

1 definition, that there be some form of communication
2 directed at the target?
3 A. Communication and, in the elaboration of that idea,
4 this expression or this communication might be in the
5 degree of violence or in the utterances, statements,
6 gestures, communications --
7
8 Q. Yes, I put all that to you. So do you agree that some
9 form of communication, according to your definition, is
10 essential for there to be a bias crime?
11 A. Communication as expressed in --
12
13 Q. Yes.
14 A. In degree of violence or in utterances, statements,
15 gestures or other communications.
16
17 THE COMMISSIONER: Q. Doctor, there is no doubt that we
18 are accepting - I am accepting and Mr Gray is accepting,
19 Mr Tedeschi no doubt will accept - that the term
20 "communication" is enlarged or amplified by the expressions
21 you have thereafter used, "degree of violence, utterances,
22 statements, gestures", or a catch-all, "other
23 communications".
24 A. Okay.
25
26 MR GRAY: Q. There is no doubt about that. We accept
27 that that's what you say. But all of that is by way of
28 expanding the point that you are making, which is that the
29 requirement of your definition is expressing an animus by
30 some form of communication. Are you really trying to move
31 away from that or do you still say that?
32 A. Well, yeah - yes, and that communication --
33
34 Q. So the answer is yes. Sorry, I'll let you --
35 A. But I'm trying to say that communication that I'm
36 referring to could be violence, utterances, statements,
37 gestures.
38
39 Q. No, you've said that four times. I've understood
40 that. You don't need to say it again. You've made that
41 very clear.
42 A. All right.
43
44 Q. Accepting that it could be in those different forms,
45 a form of communication is essential?
46 A. Yes, it is considered a message crime. A bias crime
47 is a message crime.

1
2 Q. Is it essential - excuse me, is it essential,
3 according to you, in your definition, paragraph (a) on
4 page 82?
5 A. Yes, it expresses --
6
7 Q. Right. Now, if it --
8
9 THE COMMISSIONER: Q. Sorry, just hang on a minute. You
10 uttered something after you just said "it". I want to make
11 sure, Doctor, that you are agreeing with what is being put
12 to you, that a communication is essential. Is that your
13 first requirement, "communication", as defined by you in
14 the sentence - "degree of violence", et cetera - but is it
15 an essential item?
16 A. Yes, with the caveats that I've said.
17
18 MR GRAY: Q. When you say "with the caveats that I've
19 said", you mean that the communication could be in any of
20 the different forms --
21 A. Yes.
22
23 Q. -- that you have suggested?
24 A. Yes.
25
26 Q. Is that a "yes"?
27 A. Yes.
28
29 Q. Right. Well, take the body at the bottom of the
30 cliff, where all you know is that the body is at the bottom
31 of a cliff. You don't know how it got there, you don't
32 know whether it was pushed, you don't know whether it fell,
33 you don't know anything about it, except there it is. But
34 you are assessing that case as to whether or not it is
35 a bias crime. There is no communication able to be found,
36 is there?
37 A. I don't know if there is no communication to be found.
38
39 Q. Well, what could it possibly be?
40 A. Well, you know, if there's evidence that the person
41 was pushed.
42
43 Q. Excuse me, I just put that in, you don't - in the case
44 that I'm putting to you, all you know is body at bottom of
45 cliff.
46 A. Mmm-hmm.
47

1 Q. No evidence of being pushed. No evidence of how the
2 body got there at all. But it's one of the cases you have
3 to address.
4 A. Mmm-hmm.
5
6 Q. How can you find communication?
7 A. If nothing else is known about that, other than
8 there's a body at the bottom of the cliff, then, yeah, it
9 is very difficult to find bias crime.
10
11 Q. Well, impossible?
12 A. Yeah.
13
14 Q. On your approach?
15 A. Yeah.
16
17 Q. Wouldn't it?
18 A. Yeah.
19
20 Q. So any such case, such as the case of John Russell,
21 would have to be, straightaway, no bias crime?
22 A. Well, if there is no - no information, yes, if there
23 is no other information, yes.
24
25 Q. Thank you for confirming that. Now, your three -
26 well, your (a) and (b) - and you have put (c) in a slightly
27 different category - your (a) and (b) do not contain
28 a component to the effect of the need for the crime to be
29 motivated in whole or in part by bias, do they? There is
30 no "in whole or in part" or something like it in your
31 definition?
32 A. Well, I didn't put "in whole or in part on the basis
33 of" - I didn't put that in, no.
34
35 Q. No. Whereas the police definition that they used did
36 include "in whole or in part", didn't it?
37 A. Yes.
38
39 Q. Yes?
40 A. It's not in there. It doesn't mean that it isn't --
41
42 Q. No, no, please, the question was --
43 A. It's not in there, yes.
44
45 Q. -- the police definition does include "in whole or in
46 part", doesn't it?
47 A. Yes.

1
2 Q. Is that a yes?
3 A. Yes.
4
5 Q. Yours does not?
6 A. Okay.
7
8 Q. Well, not "Okay"?
9 A. Yes.
10
11 Q. Do you agree that yours does not?
12 A. It doesn't contain that phrase.
13
14 Q. No. Why did you not include such a phrase or
15 something similar?
16 A. To my mind, it's - and I may be wrong - implicit.
17
18 Q. How is it implicit?
19 A. Because any kind of intentionality with respect to
20 harm on the basis of any part of bias would be included.
21
22 Q. Where does your report say that?
23 A. Well, okay --
24
25 Q. Anywhere in your report, where do you say that you've
26 included in the category of cases where there is evidence
27 of bias crime, cases where the evidence is that a bias
28 factor was present --
29
30 MR TEDESCHI: Page 83, last paragraph, second sentence.
31
32 MR GRAY: Perhaps I'll finish the question that has been
33 testified to from the Bar table in advance.
34
35 Q. Where in your report do you say that in cases where
36 you've said there is evidence of bias crime, that will be
37 found even if the evidence of bias is only part of the
38 matrix of contributing factors?
39
40 MR TEDESCHI: In answer to that question, he has to be
41 given --
42
43 THE COMMISSIONER: No, Mr Tedeschi, I will allow the
44 witness to answer the question.
45
46 MR TEDESCHI: I don't mind him answering, but he should be
47 given an opportunity to look at his report. He is being

1 asked --
2
3 THE COMMISSIONER: Mr Tedeschi, no, don't get excited.
4 Would you just please resume your seat.
5
6 Q. Doctor, when you're answering this question take as
7 long as you like to read and re-read your report.
8 Mr Tedeschi's given you a helpful hint from the Bar table,
9 but take a moment to read --
10 A. I believe that it's in the report. I - I can't tell
11 you where it is.
12
13 Q. I'm sorry, I couldn't hear you.
14 A. I believe it - I believe there's a reference but
15 I don't know where it is.
16
17 THE COMMISSIONER: Okay, all right.
18
19 MR GRAY: Q. The suggestion from the Bar table, from
20 counsel representing you is that --
21
22 MR TEDESCHI: I object. I don't represent him.
23
24 THE COMMISSIONER: All right. Well, we will deal with
25 that another time.
26
27 MR GRAY: Q. Is that it's on page 83. So read the whole
28 of page 83 and tell us where it is.
29 A. "Some degree of intentionality".
30
31 Q. Where are you pointing to?
32 A. On the top of - the top of the second paragraph.
33
34 Q. "Criminal acts require some degree of intentionality";
35 is that what you're pointing to?
36 A. Just a second. Well, I don't - I don't know where it
37 is, but I think we have made reference to any degree of --
38
39 Q. Well, it doesn't seem to be on page 83, does it?
40 A. Any - any act that includes, you know, a - an animus
41 against an individual, because of their belonging-ness to
42 a category, you know, it sounds to me that that is - that
43 is what's being captured in this - in this situation.
44
45 Q. Well, let's explore that. The passage that you have
46 been invited to nominate, and now have nominated, is --
47 A. Well --

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. --

*Criminal acts require some degree of
intentionality --*

THE COMMISSIONER: Sorry, I don't think the doctor is comfortable, by reason of his reaction.

Q what is it --

A. I'm - I - oh, go ahead, sorry.

MR GRAY: Q. You are looking, I take it, at the paragraph beginning:

The second factor ...

Is that where --

A. Yeah.

Q. -- you're finding what you think might be the answer? Is that where you're pointing to?

A. I don't know where the answer is.

Q. Well, let's look at what has been pointed to by counsel next to me. The paragraph beginning "The second factor" is a discussion of your requirement (b) in the definition, isn't it? "Bias crime produces an act that intentionally causes harm", and you then say:

*The second factor permits a review of the
intentionality of harm.*

That's what you're talking about, isn't it?

A. Yes.

Q. Yes?

A. Yes.

Q. Right. And in the context of the requirement of intentionality, you observe that criminal acts require some degree of intentionality and some are planned and calculated, while others are more reactive and defensive, and you go on to flesh out that distinction between planned and calculated acts and others being more reactive. That's what the paragraph is about, isn't it?

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. Right. Now, my question was about something different --

A. Okay.

Q. -- which is, in the police definition of "Bias Crime", they say that a bias crime is an offence that is motivated in whole or in part by the bias. Remember that?

A. Yes.

Q. Your definition does not include anything to do with the motivation being sufficient if whole or in part, does it?

A. No, it doesn't state that. It doesn't mean that the intention or - it doesn't mean that, in reading that, that that isn't - that a - well, I don't even know what "in part" really refers to in the definition you're citing, with respect to the what the police are saying.

Q. Turn back, you can see what it refers to, page 81, the definition of "Bias Crime" offered by the police, if you turn to page 81, under the heading "Defining Bias", the police definition is set out:

A bias crime is a criminal offence motivated against persons, associates of persons, property or society that is motivated, in whole or in part, by an offender's bias ...

et cetera. So the "in whole or in part" refers to the motivation, doesn't it, in that definition? Is that a hard question? Why are you taking so long? Isn't that what "in whole or in part" relates to in that definition?

A. Yes, motivation.

Q. Right. Now, in your definition. You talk about expressing a categorical animus and producing an act that intentionally causes harm, don't you - yes?

A. Yes.

Q. You don't say anything about the bias being able to be found present if it plays - if it's wholly responsible for the crime or only partly responsible for the crime, at all, do you?

A. No.

1 Q. And when you talk about "criminal acts require some
2 degree of intentionality", that is making a different
3 point, isn't it?

4 A. Yes.

5

6 Q. Thank you. Now, if you leave out the component that
7 bias crime can be found even where the motivation is only
8 partly bias and not wholly bias, then you will end up with
9 a lower number of events found to be bias crime, won't you?

10 A. If you do. It's not necessarily the case, and I would
11 not say it is the case, that, in reading this, one thinks
12 that if a person is, for instance, doing - committing
13 a robbery and intends to commit a robbery against a gay
14 person, perceiving that person to be much more - in a much
15 more vulnerable position - I think that there's nothing in
16 my understanding of what I've described here as excluding
17 that from being a bias crime.

18

19 Q. So with the robbery case - and there were some cases
20 in the list that had a robbery possibility, at least in
21 them --

22 A. Yeah.

23

24 Q. -- was your approach to say that, well, if it was
25 a gay person being robbed, even if it was only because,
26 seemingly because they were a vulnerable target who might
27 not report the crime, or something, would that be a bias
28 crime or would that be excluded because it was really
29 a robbery?

30 A. What do you mean by reporting the crime?

31

32 Q. I will go back a step. I thought you were referring
33 to cases of robbery of a gay person, which might be
34 explained by the fact that the gay person was easy prey for
35 a robbery, rather than being attacked because he was a gay
36 person; I thought that's what you were getting at?

37 A. Yeah, I was getting at that if a person selects an
38 individual for the target of robbery, for the purpose of
39 robbery, because they perceive that person to be
40 particularly vulnerable due to their being gay, then that
41 is a bias crime.

42

43 Q. That's my question. You would say that was in as
44 a bias crime --

45 A. Yep.

46

47 Q. -- and not excluded because robbery was the - --

1 A. That's right.
2
3 Q. -- sort of main motive, perhaps?
4 A. That's right.
5
6 Q. Thank you. That's clear, thank you very much.
7
8 THE COMMISSIONER: Q. So it follows from that, does it,
9 that you would include those matters where there were mixed
10 motives?
11 A. Where there were what?
12
13 Q. Mixed motives?
14 A. Yes. Can you --
15
16 Q. I'm so sorry. Provided there was a gay hate bias
17 aspect to it?
18 A. Yeah, provided that the harm was intended targeting
19 that individual because - partly because, because if
20 robbery is the other part --
21
22 Q. Yes?
23 A. -- they are more vulnerable because of their category.
24
25 THE COMMISSIONER: Yes, thank you.
26
27 MR GRAY: Q. Are there any other situations that you can
28 think of now - and if you can't, it's not a criticism, it's
29 not a - where that sort of mixed --
30 A. Yes.
31
32 Q. -- situation arose?
33 A. There is a strange mixture, situation, which I hate to
34 bring up, but there are - it may have to do with robbery or
35 drugs, but there were a number of cases, as you probably
36 know, that - where there was young men, of adolescent age,
37 that maybe involved in sexual services and in the - in the
38 interaction that ensues, you know, a homicide takes place
39 or what have you. So again, you know, what was - what is
40 the intention there? The intention may have been extract
41 some money from this person, or what have you. So it is -
42 actually, it's more like a robbery, so I'll take that back.
43
44 Q. Well, apart from the robbery scenario, are there any
45 other examples that you can think of --
46 A. It doesn't come to mind. I've obviously tried to
47 stretch it too far.

1
2 Q. I was just going to ask you, are there any other
3 examples you could think of - and I'm not going to
4 criticise if you can't --
5 A. Okay.
6
7 Q. -- where there were - where you would say that there
8 were mixed motives and you, nevertheless, put it in the
9 "Bias Crime" category?
10 A. Yeah, I - I tend to think there were, but I - but I -
11 again, I am sorry that I - that nothing comes to mind.
12
13 Q. No, all right.
14
15 THE COMMISSIONER: Mr Gray, I notice the time, but I can
16 sit until 4.30. Would that be of assistance?
17
18 MR GRAY: It would be of assistance generally,
19 Commissioner, because of the various time that has been
20 lost, I won't finish today, in any event, but I'm very
21 content to go for another 20 minutes.
22
23 THE COMMISSIONER: Let me ask: Mr Tedeschi, I take it it
24 is a matter of indifference to you?
25
26 MR TEDESCHI: It's perfectly all right.
27
28 THE COMMISSIONER: Okay.
29
30 Q. Doctor, what would be your preference, to break for
31 the day or to go for another half hour?
32 A. Half hour is fine.
33
34 THE COMMISSIONER: Okay, good.
35
36 MR GRAY: Q. Back to page 92 of the report, the
37 breakdown of the figures in your report includes separating
38 anti-gay bias from anti-paedophile animus, doesn't it?
39 A. Yeah. We saw that as a subset.
40
41 Q. Well, in the table, at least --
42 A. Yes.
43
44 Q. -- you've set out four?
45 A. Yes.
46
47 Q. And anti-gay is just simply separate from

1 anti-paedophile?

2 A. Yes, they are both bias crimes.

3

4 Q. Right. So just clarifying that, on page 92 on that
5 column, then, on that table - so you would say that you
6 would add anti-gay bias and anti-paedophile animus together
7 as being, all of them, crimes with a relevant bias factor
8 in them; is that right?

9 A. Yes. So, sorry, both of those columns being all of
10 the - yeah, yes.

11

12 Q. So that would add up to 29 --

13 A. Yes.

14

15 Q. -- altogether? And for "Insufficient Information",
16 33 altogether. And the ones that you say have "No Evidence
17 of Bias Crime", in total, are 23 out of 85?

18 A. Yep.

19

20 Q. All right. I'll come back to that. You say - or you
21 have said just now - that even though you have tabulated
22 them separately, that you regarded the anti-paedophile ones
23 as, nonetheless, to be added to the anti-gay ones in some
24 way?

25 A. They're a subset. Yeah. It's a - it's a very fraught
26 issue, problem, and I'm - I've never been very comfortable
27 with it, you know, even although it's there. I --

28

29 Q. Well, the reader, or some readers, would see in terms
30 of the numbers, that the academics seem to have said there
31 are only 17 cases of anti-gay bias, looking at that table,
32 wouldn't they?

33 A. Oh, well, that - yes, in terms of how that looks, yes.

34

35 Q. And that would look pretty low?

36 A. Yep.

37

38 Q. And was that something that occurred to you when you
39 broke it up in this way?

40 A. No. Unfortunately not. If it would have occurred to
41 us, this would have been done differently.

42

43 Q. If somebody commits a crime against a person where the
44 perpetrator thinks the victim is a paedophile, but thinks
45 that because the person thinks all homosexuals are
46 paedophiles, wrongly, that would be an anti-gay motive,
47 wouldn't it?

1 A. Yes.

2

3 Q. And so the anti-gay bias factor would be present, even
4 though the person - the perpetrator, may have had some
5 misconception?

6 A. Yes. Now, this - this is again - I'm - I'm not
7 comfortable with it. If I - if we were - if I was to be
8 involved in categorising this again, I don't think I would
9 be comfortable in dividing that up. I know - I expected,
10 when we provided our draft to the police, that we would be
11 getting feedback to say, "I don't know what you are doing
12 here, but you might think about it." And in a way, that -
13 we didn't, I think, get that strong feedback at the time,
14 and we just left it.

15

16 I think that I would - I would not - I would not -
17 I would not stand by that.

18

19 Q. No. Can I just explore it, though. Is this right,
20 that for you, when you did do it --

21

A. Yeah.

22

23 Q. -- accepting you might have reservations now, but when
24 you did do it --

25

A. Yeah.

26

27 Q. -- where you understood a case to be one where the
28 perpetrator supposed --

29

A. Yeah.

30

31 Q. -- wrongly --

32

A. Yeah.

33

34 Q. -- that paedophiles necessarily were gay, would you --

35

A. Yeah, that would be anti-gay.

36

37 Q. Well, no, could I just ask the question. Would you be
38 putting that into the "Anti-gay" column or the
39 "Anti-paedophile" column?

40

A. I believe that we would put that into the "Anti-gay"
41 column, yeah.

42

43 Q. And how would you work it out as to what that person's
44 mental state of mind was?

45

A. If - if the - so if the person is expressing an animus
46 towards paedophiles because he thinks all paedophiles are
47 gay, how would we work that out?

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. No. How would you work out that that was the person's state of mind, the perpetrator's state of mind? How would you know? Unless he said it, how would you know?

A. Yeah, no, we wouldn't.

Q. So when you didn't know, but there was material that suggested that the victim may have been or may have been, rightly or wrongly, thought to have been a paedophile, but you don't know what the perpetrator's state of mind was, where would it go, which column?

A. I'm trying to remember that process, and I - it's - I'm - I'm thinking that we would have put it in an "Anti-gay" column. That's what I think. But I - I'm not certain. I would think that would have to be there. Because there's no other place for it.

Q. What would you say to the suggestion that the more reasonable approach would have been to categorise all such cases as "Anti-gay" unless there was clear evidence to the contrary?

A. I would have to agree with you.

Q. Okay. Could I just ask you to have a look at volume 13, please, and turn to tab 271 [SC0I.79339_0001] have you found 271?

A. Yes.

Q. It is an email chain. I want to just start from the back of it. The first one is from --

A. How far back?

Q. -- Derek Dalton to you and Dr Tyson on 16 February 2017. Do you see that?

A. This one here? Yep.

Q. I think so, yes. And Dr Dalton is talking to you about three outstanding cases?

A. Yeah.

Q. He says:

... we need to try (if possible) to reach a consensus about the following 3 disagreement cases.

Do you see that?

1 A. Yep.
2
3 Q. And he names the three, and in each case, he nominates
4 what the police say?
5 A. Okay.
6
7 Q. The police say "SBC" - which is "Suspected Bias
8 Crime", or police say "NBC", "No Bias Crime"?
9 A. Yep.
10
11 Q. Do you see that? Do you see that?
12 A. Yep.
13
14 Q. Yeah. And he's advancing views about what the better
15 view might be about each of those. But what I want to get
16 from you is this: that's the three of you giving
17 consideration to what the police should say in their
18 approach, isn't it? They are the police's terms,
19 "Suspected Bias Crime"?
20 A. Yep.
21
22 Q. So why are you telling the police what they should
23 say?
24 A. Why are we telling the police what they should say?
25
26 Q. Yes. It's one thing for you to come to your own views
27 about what you say, but why are you reaching a consensus
28 about what they should say?
29
30 MR TEDESCHI: I object.
31
32 THE COMMISSIONER: What's the objection?
33
34 MR TEDESCHI: I don't think it says that.
35
36 THE COMMISSIONER: I think it's sufficiently ambiguous,
37 Mr Tedeschi, for the proposition to be put.
38
39 THE WITNESS: It seems to me that we're trying to reach an
40 agreement on what we say.
41
42 MR GRAY: Q. Well, let's just look at that. He goes,
43 later down the page, to discuss the three of them in the
44 indented part?
45 A. Okay.
46
47 Q.

1 *I think for me Gillies should be SBC.*

2

3 Doesn't he? Do you see he says that?

4 A. Yeah.

5

6 Q. He says:

7

8 *For Tonks ... I agree with the police that*
9 *it is SBC ...*

10

11 *For Dempsey ... I am of the mind that it*
12 *really should be SBC.*

13

14 "Suspected Bias Crime".

15 A. Yep.

16

17 Q. Now, you can't be there discussing what you would say,
18 because you don't have a category of "Suspected Bias
19 Crime", do you?

20 A. No, we don't have.

21

22 Q. But the police do, and you seem to be earnestly
23 discussing, or Dr Dalton is, what the correct approach for
24 the police is, don't you?

25 A. Yeah, now, if I'm - I'm - I'm not - what the correct
26 approach for the police is?

27

28 Q. For the police is under their four categories, because
29 "SBC" is not one of your categories.

30 A. But did we - did we have - at that point, were we
31 using --

32

33 THE COMMISSIONER: Q. You're about to ask the rhetorical
34 question, which I was going to ask you.

35 A. Okay.

36

37 Q. No, no, I was going to ask you exactly the same
38 question. Do you recall when it was you created your
39 categories and applied them?

40 A. No, I don't exactly.

41

42 Q. Well, do your best. I mean, here we are in February
43 2017, you're on board from October 2016. Do you have any
44 idea at all or was it as a result of, what, the failure to
45 reach a consensus with the police that caused you to have
46 another way of doing it or looking at another way of doing
47 it? I just don't know.

1 A. I do recall us debating - I'm trying to answer your
2 question.
3
4 Q. I know you are.
5 A. I do recall us debating this problem of suspected bias
6 crime versus simply bias crime, and that we - although the
7 distinction was pretty adamantly retained by the police, we
8 just - we just couldn't see the helpfulness of it. And so
9 we ended up with losing that category.
10
11 MR GRAY: Q. So do you think the explanation is that, at
12 this point, which is February, you might have been still at
13 that point --
14 A. Yeah, I would - I would think that at this point we
15 must have been still at that point.
16
17 Q. Still using their four categories?
18 A. Still with their four categories, yes.
19
20 Q. And only at some later point did you --
21 A. Yes.
22
23 Q. -- drop their four and substitute your four?
24 A. Yes, yes.
25
26 Q. Okay. Well, move forward, then, to later on in the
27 chain, to one from you to Derek Dalton on 20 February at
28 1pm. That's the one. Now, this may feed in to what you
29 were just suggesting. You say to your two fellow workers:
30
31 *Derek, as we discussed I think we need an*
32 *agreed upon tool before we make a guess at*
33 *what to say. If we merely reproduce the*
34 *checklist we are given by the police, we*
35 *really do not have much of a function ...*
36
37 Et cetera. Does that assist you, does that --
38 A. Yeah, so that --
39
40 Q. Is that talking about the same tool?
41 A. That's why I think we were still bandying about that
42 SBC category.
43
44 Q. All right. Well, in the next paragraph you say:
45
46 *... since we do not know how the police*
47 *are using their checklist (what happens*

1 *when there is no excessive violence, the*
2 *offender is not known to be gay, etc, how*
3 *does that impact the evaluation?) following*
4 *their method produces unreliable results.*

5

6 Do you see that?

7 A. Yes.

8

9 Q. So that was your developing view, I take it, by then,
10 that you didn't know how they were using the checklist?

11 A. Yep.

12

13 Q. And that, therefore, trying to follow their method
14 would produce unreliable results?

15 A. Yep.

16

17 Q. Then you move on to a different topic:

18

19 *It should be clarified if the bias crime is*
20 *stipulated as anti-gay bias as opposed to*
21 *anti-paedophile bias.*

22

23 Do you see that?

24 A. Yep.

25

26 Q. And I'll just let you read the rest of that
27 paragraph to yourself.

28 A. Yeah.

29

30 Q. Having explained your thinking in that way there, you
31 then say in the next paragraph:

32

33 *So on this I would classify all the*
34 *suspected anti-paedophile cases out ...*

35

36 Now, is that what you did or is it not what you did?

37 A. I don't think it's what we did. But we - but in -
38 after this, what we did was anti- - in putting it under the
39 classification of anti-gay bias, as a subset of anti-gay
40 bias, we, I think, also moved away from this. Because
41 what - and there's one case, and I think it - Assistant
42 Commissioner Crandell talked about it, I forget what it was
43 exactly, but it was a case that they categorised as no
44 bias, and we categorised as bias because we put it in the
45 anti-paedophile bias category, and it was a case where -
46 I believe, and I'm just - my memory might be vague on this,
47 is that the perpetrator did attack and murder the victim on

1 the belief that he was a paedophile and he had a history
2 of - the victim had a history of sexual abuse by a
3 paedophile, and I don't know - I might be wrong - if he
4 indeed was the perpetrator of that sexual abuse as well.
5 So - anyway, I am not going to be comfortably defending
6 this area, as I said before. I - I think it's - we should
7 just simply have collapsed it into bias, anti-gay bias.
8

9 Q. All right. Thank you. In Dr Dalton's response, which
10 is then the one above the one we've been looking at, back
11 to you, on the paedophile topic - stopping there, you see
12 how he has a heading relating to this topic?

13 A. Yeah, yeah.

14
15 Q. He says:

16
17 *This is still a mess. I actually disagree*
18 *with Mason.*
19

20 He says he thinks that anti-paedophile bias must initially
21 be counted as bias.

22 A. Yep.

23
24 Q. And perhaps that's consistent with what you are
25 saying?

26 A. Yes.

27
28 Q. Perhaps you are saying that, in due course, that's how
29 it played out?

30 A. And so that's actually how we ended up coding it.
31 What we ought to have done was take out that whole section
32 and take out that distinct code.
33

34 Q. I just want to show you a couple of examples of cases
35 where it seems your team placed cases in the
36 "Anti-paedophile Animus" column, and just ask you about
37 them. It's in volume 2, tab 49 [SCOI.76961.00014_0001].
38 You nominated, as we have seen, I think, 12 in all as being
39 in the "Anti-paedophile" column, and I don't want to take
40 you to all of them but just a couple as examples.

41 A. Yes.

42
43 Q. On page 2 of this document, do you see down the
44 bottom, case number 5?

45 A. Yep.

46
47 Q. You have placed that in the "Anti-paedophile"

1 category. This was the man who was attacked in a public
2 toilet in Newcastle. What is the basis for bringing in an
3 anti-paedophile factor in that case?
4 A. I don't know. There's not - there's - I couldn't tell
5 you about - I don't have any information there.
6
7 Q. Well, let's have a look at number 24.
8 A. I mean, there's got to be more information than that.
9
10 Q. Well, the Special Commission has more information
11 about that case and counsel for the police has it. At any
12 rate, you can't recall anything that might have --
13 A. No.
14
15 Q. -- prompted this case being put in that category?
16 A. No, not at all.
17
18 THE COMMISSIONER: Q. Would it be any more than mere age
19 of the deceased?
20
21 MR TEDESCHI: Sorry?
22
23 THE COMMISSIONER: No, I'm not talking to you,
24 Mr Tedeschi. Oh, you want me to repeat it?
25
26 MR TEDESCHI: I'm sorry, I couldn't hear --
27
28 THE COMMISSIONER: Forgive me. No, forgive me. I do
29 apologise.
30
31 Q. Would it be any more than the advanced or - one view -
32 the advanced age of the deceased?
33 A. I don't see anything.
34
35 MR GRAY: Q. You see the deceased is aged 69 and the
36 suspect is aged 22? But is there anything else --
37 A. Without knowing something that the suspect might of
38 said or - I have no idea why - I don't know why it is
39 there.
40
41 Q. Well, is it possible that --
42 A. And it may be - as I said - go ahead, I'm sorry.
43
44 Q. No, you go.
45 A. No, I - I don't know. I can't see anything.
46
47 Q. Is it possible that it is simply that the victim was

1 69 and the attacker or the suspected attacker was 22?

2 A. I don't know. If so, it doesn't seem sufficient for
3 that. So I - I don't know. I have no idea.

4
5 Q. Have a look at number 24 on page 12. The victim is 26
6 years old. The killer is 32 years old. In the summary,
7 there is nothing mentioned anything to do with paedophilia,
8 and yet it's in the "Anti-paedophile" category. Why would
9 that be?

10 A. I can't see anything. I can't see anything.

11
12 Q. And number 72 on page 35? The victim is 23, the
13 killer is a year older, 24. There doesn't seem to be any
14 mention of anything to do with paedophilia in the summary,
15 and yet that's where it's been categorised?

16 A. I don't - yeah, I don't know. I can't say.

17
18 Q. Well --

19 A. I would just go back to my earlier statement and say
20 that we ended up putting these as gay bias, and - I think
21 we went down a track that we shouldn't have gone down.

22
23 Q. Just on that - we're about to finish for the day, but
24 in volume 13, I'll just show you that briefly, at tab 277
25 [SCOI.80025_0001]. It's quite a long chain. I only need
26 to take you to one part of it. It's a chain of emails, and
27 the time is April 2018, so the ACON report is about to come
28 out and indeed the Parrabell final report is not far off
29 being published. It comes out within a couple of months,
30 just to orient you in time.

31
32 On the third page of the documents, there is an email
33 from you to Derek Dalton on 18 April at 1.36pm. Yes, that
34 one. You say to him:

35
36 *I am wondering if we can come up with*
37 *another term to attribute to the complex*
38 *animus that we are describing with*
39 *paedophilia. If we substitute it for*
40 *something more innocuous like: "conflict*
41 *identity bias" then we may be better off.*
42 *Let me know what you think.*

43
44 Do you see that?

45 A. Yep.

46
47 Q. He writes back to say - well, you can see what he says

1 in the response. Among other things, he says he thinks it
2 might be too late to change it because it was on the verge
3 of being published. Now, first of all, why did you think
4 you needed to come up with something more innocuous?

5 A. I think "innocuous" is the wrong word. I think we
6 were struggling with cases where some of them were - some
7 of them were advances, so people would make advances to
8 other people, and we were - and we were struggling with the
9 genesis of that. Obviously not everyone reacts to an
10 advance in a violent manner, and we looked at some of the
11 research.

12
13 Q. But we're talking about paedophilia here?

14 A. Yeah, no, I think that - I think the - yeah,
15 I understand. And some of the - some of the generation of
16 that reaction, in some of the literature, is related to
17 people that may have had - in their past been the victim of
18 sexual assault, as children. So I'm very uncomfortable
19 with this, and, you know, this is - this was part of where
20 we really needed a little more back and forth with a wider
21 body of people. We had - it was restricted to very few
22 people that we could speak to about these terms.

23
24 Q. What wider body of people should you have --

25 A. Well, in terms of - what would usually happen is,
26 like, what I'm used to in terms of a review process is you
27 put something out and then you have all these people
28 reviewing and saying, "You should have done" - "This is
29 wrong and this is" - and if - when you don't - when you're
30 used to that kind of pattern and you don't get it, it's
31 really - it's really missing. That is just the - the
32 difference in - in a review of a work that's - that's an
33 academic work and how you work in terms of a commission.
34 You don't have the same number of readers who are making
35 substantive comments on areas that need to be sort of
36 considered.

37
38 Q. All right. Well --

39 A. And so this is an area that I think is one that needed
40 more consideration.

41
42 Q. Well, you seem to have been - tell me if this is
43 right - coming up with a term, "conflict identity bias",
44 off the top of your head, as it were. That's just a --

45 A. Well, it's --

46
47 Q. -- an invention, is it?

1 A. In terms of bias, yeah, but in terms of - conflict
2 identity is a very big part of, as you know, the whole bias
3 crime domain, right? So that's - conflict identity is very
4 much in the centre of bias crime.

5
6 Q. But you thought you might - you were suggesting that
7 perhaps that's a term that you could use instead of using
8 the word "paedophilia"?

9 A. Yes. Yes. But - not for the - not - it doesn't
10 reflect all the cases that would have been in that category
11 necessarily, no.

12
13 MR GRAY: Well, is that a convenient time?

14
15 THE COMMISSIONER: Yes, that's a convenient time. Now,
16 tomorrow morning, 9.30, Ms Coakley. So I will have it in
17 here.

18
19 How long will you be?

20
21 MR TEDESCHI: Commissioner, could I just have a word with
22 my learned friend and I might be able to answer that
23 question.

24
25 THE COMMISSIONER: Yes, certainly.

26
27 MR TEDESCHI: Commissioner, my learned friend doesn't have
28 any problem with me speaking to Dr de Lint in the morning
29 prior to the hearing, and so we might be able to go
30 straight in to my questioning of him.

31
32 MR GRAY: No, no, we've got Coakley at 9.30.

33
34 THE COMMISSIONER: That doesn't answer my question.

35
36 MR TEDESCHI: I'm sorry, after Coakley.

37
38 THE COMMISSIONER: Yes, but it still doesn't answer my
39 question, how long do you think you will be if it is you
40 with --

41
42 MR TEDESCHI: Half an hour.

43
44 THE COMMISSIONER: Half an hour. All right. That's fine.
45 We will resume at 9.30 with Ms Coakley. Dr de Lint, by all
46 means, whatever arrangements made to speak to Mr Tedeschi
47 or others, that can take place. If I say in your case,

1 though, I won't expect you - by all means, you are able to
2 sit in if you wish, but I don't expect you before, say,
3 about 10 o'clock, but if you wish to come in and listen to
4 Ms Coakley, you are entitled to do that. So whatever suits
5 you. You just make whatever arrangement is convenient.
6

7 THE WITNESS: Okay.
8

9 THE COMMISSIONER: All right. I will adjourn until 9.30.
10 Thank you.
11

12 **AT 4.36PM THE SPECIAL COMMISSION OF INQUIRY WAS ADJOURNED**
13 **TO FRIDAY, 3 MARCH 2023 AT 9.30AM**
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

	17 [1] - 2706:31	2687:1, 2687:36, 2708:44, 2718:13	85-odd [1] - 2651:24	2629:3, 2629:9, 2644:44, 2674:27, 2688:4, 2694:42, 2696:19, 2696:26
'40s [1] - 2608:43	18 [1] - 2715:33		88 [4] - 2607:17, 2607:42, 2607:47, 2652:11	
'Insufficient [1] - 2620:21	19 [1] - 2652:44	31 [1] - 2606:27		
'No [1] - 2627:3	1920s,'30s [1] - 2608:43	32 [1] - 2715:6		
	1988 [1] - 2616:20	33 [1] - 2706:16	<hr/> 9 <hr/>	acceptance [2] - 2630:14, 2640:39
<hr/> 1 <hr/>	1pm [1] - 2711:28	35 [1] - 2715:12		accepted [6] - 2630:21, 2630:45, 2644:37, 2654:17, 2671:13, 2674:39
1 [8] - 2655:43, 2658:38, 2666:34, 2667:43, 2674:6, 2689:22, 2689:35, 2690:8	<hr/> 2 <hr/>	<hr/> 4 <hr/>	9 [3] - 2641:29, 2658:38, 2684:6	accepting [10] - 2671:7, 2671:9, 2671:11, 2687:25, 2691:11, 2696:18, 2696:44, 2707:23
1.36pm [1] - 2715:33	2 [15] - 2606:20, 2606:25, 2648:30, 2655:43, 2656:1, 2666:34, 2666:44, 2668:12, 2674:3, 2674:9, 2674:39, 2689:22, 2690:8, 2713:37, 2713:43	4.30 [1] - 2705:16	9.30 [4] - 2717:16, 2717:32, 2717:45, 2718:9	access [6] - 2630:32, 2630:33, 2634:23, 2634:31, 2649:12, 2649:27
10 [16] - 2619:45, 2657:1, 2657:6, 2657:9, 2657:13, 2657:26, 2657:35, 2657:38, 2657:45, 2658:42, 2662:34, 2662:38, 2672:10, 2690:28, 2694:12, 2718:3	20 [15] - 2620:21, 2643:18, 2643:30, 2644:22, 2644:29, 2645:27, 2646:22, 2652:21, 2652:26, 2659:1, 2676:33, 2680:40, 2681:18, 2705:21, 2711:27	4.36PM [1] - 2718:12	9.30AM [1] - 2718:13	accessed [1] - 2649:21
10-point [2] - 2642:21, 2644:13		40 [1] - 2610:36	91 [1] - 2689:36	according [7] - 2607:22, 2622:32, 2673:21, 2692:27, 2695:47, 2696:9, 2697:3
10.30am [1] - 2606:25	20-odd [1] - 2652:4	<hr/> 5 <hr/>	92 [3] - 2689:23, 2705:36, 2706:4	account [5] - 2615:6, 2615:8, 2627:42, 2627:45, 2646:3
10.34am [1] - 2607:5	20-page [1] - 2652:12	5 [2] - 2687:6, 2713:44	<hr/> A <hr/>	accuracy [2] - 2653:46, 2672:46
102 [2] - 2671:23, 2671:25	2016 [3] - 2628:43, 2629:1, 2710:43	<hr/> 6 <hr/>	able [11] - 2614:44, 2616:41, 2629:22, 2646:5, 2650:44, 2675:32, 2697:35, 2702:42, 2717:22, 2717:29, 2718:1	accurate [8] - 2607:43, 2630:22, 2631:1, 2632:43, 2638:3, 2643:42, 2681:27, 2683:43
104 [2] - 2671:28, 2675:27	2017 [2] - 2708:34, 2710:43	67 [2] - 2622:27, 2656:12	abrupt [1] - 2623:23	accurately [2] - 2612:45, 2675:21
105 [1] - 2671:35	2018 [1] - 2715:27	68 [1] - 2658:37	absence [1] - 2660:2	accusation [2] - 2610:17, 2610:23
106 [3] - 2672:15, 2672:21, 2672:24	2022 [1] - 2606:9	69 [2] - 2714:35, 2715:1	absolutely [11] - 2608:41, 2612:28, 2612:43, 2615:22, 2615:37, 2619:23, 2620:27, 2628:14, 2631:20, 2640:47, 2650:19	achievements [1] - 2627:2
107 [2] - 2672:28, 2672:39	2023 [2] - 2606:25, 2718:13	<hr/> 7 <hr/>	abstract [1] - 2623:42	achieving [1] - 2681:23
108 [3] - 2672:42, 2673:8, 2675:27	205 [1] - 2641:22	7 [1] - 2648:41	abuse [3] - 2641:12, 2713:2, 2713:4	acknowledge [1] - 2610:14
109 [1] - 2673:11	22 [2] - 2714:36, 2715:1	70 [1] - 2659:19	academic [31] - 2607:12, 2608:39, 2611:41, 2612:5, 2614:19, 2620:3, 2621:6, 2622:22, 2625:4, 2625:40, 2626:24, 2626:28, 2627:31, 2628:13, 2630:14, 2630:24, 2630:25, 2642:31, 2644:5, 2644:28, 2644:46, 2648:27, 2649:32, 2655:23, 2656:9, 2659:11, 2680:46, 2681:19, 2681:39, 2689:25, 2716:33	acknowledged [2] - 2623:41, 2663:10
109(1) [2] - 2674:1, 2674:39	23 [4] - 2648:31, 2648:34, 2706:17, 2715:12	72 [1] - 2715:12	academics [7] - 2611:47, 2612:12, 2626:38, 2649:37, 2649:45, 2659:22, 2706:30	ACON [1] - 2715:27
11 [8] - 2641:46, 2642:13, 2642:23, 2642:37, 2643:26, 2644:12, 2646:18, 2646:45	24 [3] - 2714:7, 2715:5, 2715:13	731 [1] - 2641:29	accept [9] - 2628:45,	act [7] - 2690:35, 2691:1, 2691:5, 2695:34, 2700:40, 2701:28, 2702:38
110 [1] - 2674:21	2557 [1] - 2613:6	736 [15] - 2641:45, 2642:10, 2642:27, 2642:29, 2643:15, 2643:27, 2643:43, 2644:2, 2644:16, 2644:38, 2645:22, 2645:26, 2645:31, 2646:14, 2646:40		actively [1] - 2636:11
12 [5] - 2660:13, 2670:11, 2687:44, 2713:38, 2715:5	256 [1] - 2670:13	<hr/> 8 <hr/>		activities [2] - 2623:29, 2625:4
12.24pm [1] - 2648:22	258 [2] - 2660:13, 2682:9	8 [1] - 2641:22		activity [1] - 2623:8
121 [4] - 2606:20, 2657:19, 2666:23, 2667:1	26 [1] - 2715:5	80 [1] - 2694:4		acts [6] - 2609:11, 2700:34, 2701:4, 2701:41, 2701:45,
13 [3] - 2652:33, 2708:25, 2715:24	266C [1] - 2652:34	81 [2] - 2702:20, 2702:22		
14 [1] - 2641:44	27 [1] - 2671:22	82 [4] - 2690:28, 2690:29, 2695:10, 2697:4		
16 [2] - 2620:22, 2708:33	271 [2] - 2708:25, 2708:26	83 [6] - 2652:11, 2690:30, 2699:30, 2700:27, 2700:28, 2700:39		
	277 [1] - 2715:24	85 [6] - 2649:41, 2651:40, 2652:11, 2652:21, 2653:9, 2706:17		
	28 [1] - 2625:28			
	29 [1] - 2706:12			
	<hr/> 3 <hr/>			
	3 [5] - 2660:13,			

- 2703:1
actual [5] - 2613:2, 2655:44, 2674:14, 2675:33, 2684:45
adamantly [1] - 2711:7
add [4] - 2608:22, 2661:1, 2706:6, 2706:12
added [2] - 2685:7, 2706:23
addition [3] - 2643:2, 2646:18, 2651:10
additional [2] - 2663:16, 2663:31
address [5] - 2607:36, 2642:14, 2643:30, 2680:31, 2698:3
adds [1] - 2672:8
adduce [2] - 2616:13, 2635:5
adequate [1] - 2671:30
adhering [1] - 2629:43
adjourn [2] - 2667:43, 2718:9
admit [1] - 2630:46
admittedly [1] - 2608:42
admitting [1] - 2626:37
adolescent [1] - 2704:36
adopt [1] - 2642:35
adopted [6] - 2642:15, 2643:40, 2661:22, 2661:29, 2661:40, 2672:17
adoption [1] - 2661:23
advance [4] - 2627:11, 2640:26, 2699:33, 2716:10
advanced [2] - 2714:31, 2714:32
advances [2] - 2716:7
advancing [1] - 2709:14
adversarial [1] - 2646:7
adverted [1] - 2644:10
afar [1] - 2608:27
affiliated [1] - 2636:42
affirm [1] - 2611:31
afresh [1] - 2607:22
afternoon [2] - 2633:18, 2648:9
afterwards [1] - 2608:11
age [3] - 2704:36, 2714:18, 2714:32
aged [2] - 2714:35, 2714:36
aggravate [1] - 2695:25
aggravated [1] - 2690:38
ago [16] - 2618:31, 2618:35, 2625:21, 2627:10, 2654:17, 2656:39, 2660:9, 2667:23, 2667:47, 2670:46, 2693:9, 2693:22, 2693:25, 2693:29, 2693:43
agree [31] - 2613:25, 2613:35, 2637:24, 2639:2, 2643:45, 2646:40, 2647:31, 2647:33, 2671:31, 2671:32, 2671:33, 2672:3, 2672:4, 2672:12, 2672:25, 2672:39, 2673:2, 2673:7, 2673:25, 2673:26, 2673:47, 2674:5, 2674:18, 2679:19, 2687:31, 2693:35, 2693:43, 2696:8, 2699:11, 2708:22, 2710:8
agreed [3] - 2659:35, 2693:22, 2711:32
agreeing [3] - 2661:1, 2661:13, 2697:11
agreement [2] - 2615:17, 2709:40
ahead [2] - 2701:11, 2714:42
aide [1] - 2677:6
aide-memoire [1] - 2677:6
al [2] - 2662:20, 2664:16
albeit [1] - 2629:36
allocation [1] - 2655:3
allow [3] - 2632:44, 2632:47, 2699:43
allowed [2] - 2694:11, 2694:38
allows [1] - 2668:37
almost [4] - 2613:46, 2636:20, 2637:38, 2666:11
alone [1] - 2672:33
alternative [1] - 2669:45
alternatives [1] - 2622:5
altogether [5] - 2642:9, 2651:27, 2690:12, 2706:15, 2706:16
amazing [1] - 2627:2
Amber [1] - 2606:38
ambiguous [1] - 2709:36
ambition [1] - 2664:35
America [2] - 2613:44
amount [6] - 2607:40, 2607:41, 2621:46, 2622:9, 2624:6, 2655:9
amplified [1] - 2696:20
analogy [3] - 2617:30, 2617:32, 2617:36
analysis [2] - 2672:30, 2673:14
Anders [1] - 2606:37
anecdotal [3] - 2677:19, 2677:40, 2677:44
angry [1] - 2621:23
anguish [1] - 2607:27
animosity [3] - 2608:28, 2624:32, 2625:5
animus [14] - 2640:10, 2643:10, 2690:34, 2690:37, 2691:1, 2695:34, 2695:35, 2696:29, 2700:40, 2702:38, 2705:38, 2706:6, 2707:45, 2715:38
Animus [3] - 2689:29, 2690:9, 2713:36
annexed [1] - 2657:17
answer [36] - 2610:29, 2613:20, 2617:29, 2622:4, 2622:5, 2622:46, 2626:6, 2629:26, 2644:7, 2644:37, 2652:30, 2658:13, 2662:46, 2674:5, 2677:39, 2678:24, 2680:37, 2680:39, 2681:5, 2681:30, 2681:36, 2691:11, 2691:39, 2693:29, 2694:11, 2694:24, 2694:43, 2696:34, 2699:40, 2699:44, 2701:21, 2701:23, 2711:1, 2717:22, 2717:34, 2717:38
answered [2] - 2625:21, 2649:1
answering [6] - 2626:8, 2675:9, 2683:3, 2683:5, 2699:46, 2700:6
answers [7] - 2645:44, 2652:25, 2656:42, 2665:43, 2694:16, 2694:44, 2695:5
anti [32] - 2609:17, 2609:18, 2613:47, 2618:15, 2629:37, 2635:23, 2639:39, 2639:44, 2640:10, 2705:38, 2705:47, 2706:1, 2706:6, 2706:22, 2706:23, 2706:31, 2706:46, 2707:3, 2707:35, 2712:20, 2712:21, 2712:34, 2712:38, 2712:39, 2712:45, 2713:7, 2713:20, 2714:3
Anti [13] - 2689:29, 2690:9, 2707:38, 2707:39, 2707:40, 2708:14, 2708:20, 2713:36, 2713:39, 2713:47, 2715:8
anti-gay [14] - 2609:18, 2618:15, 2705:38, 2705:47, 2706:6, 2706:23, 2706:31, 2706:46, 2707:3, 2707:35, 2712:20, 2712:39, 2713:7
Anti-gay [6] - 2689:29, 2690:9, 2707:38, 2707:40, 2708:14, 2708:20
anti-paedophile [14] - 2629:37, 2635:23, 2639:39, 2639:44, 2705:38, 2706:1, 2706:6, 2706:22, 2712:21, 2712:34, 2712:45, 2713:20, 2714:3
Anti-paedophile [7] - 2689:29, 2690:9, 2707:39, 2713:36, 2713:39, 2713:47, 2715:8
anti-police [2] - 2609:17, 2613:47
anyway [3] - 2618:45, 2687:12, 2713:5
apart [3] - 2620:35, 2650:5, 2704:44
apologies [1] - 2635:27
apologise [2] - 2618:22, 2714:29
apologist [7] - 2612:19, 2613:38, 2613:40, 2614:3, 2614:13, 2614:24, 2614:25
apologist [1] - 2613:22
apologists [1] - 2613:33
apparatus [1] - 2680:1
apparent [5] - 2616:47, 2623:8, 2624:5, 2647:5, 2687:44
appear [7] - 2611:1, 2613:33, 2615:20, 2621:21, 2629:41, 2630:44, 2632:35
appearance [1] - 2676:2
appeared [1] - 2615:30
appendix [3] - 2651:17, 2651:47, 2663:43
applicability [2] - 2660:25, 2688:25
applicable [1] - 2671:36
application [1] - 2618:41
applied [2] - 2630:4, 2710:39
applies [1] - 2673:18
apply [4] - 2619:20, 2673:6, 2690:22, 2690:25
applying [3] - 2672:5, 2682:27, 2684:27
appreciate [1] - 2688:19
appreciating [1] - 2672:37
approach [25] - 2613:37, 2614:22, 2619:47, 2631:25, 2631:26, 2631:43, 2631:44, 2632:5, 2632:6, 2632:8, 2632:9, 2632:12, 2649:7, 2664:12, 2670:10, 2691:7, 2692:27, 2698:14, 2703:24, 2708:19, 2709:18, 2710:23, 2710:26
approached [2] -

- 2618:26, 2625:23
approaches [2] - 2619:36, 2631:10
appropriate [4] - 2630:22, 2632:19, 2675:41, 2678:32
April [2] - 2715:27, 2715:33
arch [1] - 2652:7
area [7] - 2608:39, 2634:40, 2639:35, 2694:27, 2694:38, 2713:6, 2716:39
areas [4] - 2611:47, 2638:43, 2663:28, 2716:35
arise [1] - 2678:9
arose [1] - 2704:32
arrangement [3] - 2665:35, 2668:5, 2718:5
arrangements [1] - 2717:46
arresting [1] - 2609:1
arrived [1] - 2626:28
article [24] - 2608:44, 2609:4, 2613:26, 2613:28, 2630:24, 2632:28, 2632:35, 2632:38, 2632:46, 2633:2, 2633:16, 2633:25, 2633:28, 2633:46, 2634:13, 2634:19, 2634:24, 2634:30, 2641:21, 2641:38, 2641:44, 2642:16, 2644:5, 2647:12
articles [3] - 2608:41, 2611:12, 2634:3
articulate [1] - 2665:45
aside [3] - 2630:28, 2630:30, 2664:31
aspect [1] - 2704:17
aspects [2] - 2619:6, 2677:44
aspiring [1] - 2675:7
Asquith [4] - 2612:24, 2630:40, 2661:18, 2670:30
Asquith's [2] - 2609:41, 2631:24
assault [2] - 2640:37, 2716:18
assaulted [1] - 2640:46
assaults [1] - 2632:10
assert [1] - 2642:35
assertion [1] - 2642:24
assess [1] - 2631:44
assessing [5] - 2629:30, 2629:31, 2632:39, 2673:24, 2697:34
assessment [8] - 2625:32, 2630:22, 2642:32, 2643:7, 2644:6, 2644:47, 2656:35, 2659:22
assessments [1] - 2672:9
assigned [1] - 2621:11
assist [3] - 2609:34, 2625:32, 2711:37
assistance [2] - 2705:16, 2705:18
Assistant [8] - 2607:14, 2609:21, 2610:26, 2616:22, 2617:6, 2619:24, 2649:26, 2712:41
Assisting [22] - 2606:30, 2606:31, 2607:10, 2608:16, 2612:17, 2613:18, 2614:33, 2627:41, 2628:20, 2630:11, 2632:32, 2632:36, 2632:37, 2633:7, 2633:11, 2633:27, 2633:45, 2635:47, 2636:28, 2638:5, 2641:31, 2644:38
assists [1] - 2680:25
associate [1] - 2626:46
Associate [3] - 2622:22, 2682:45, 2683:16
associates [1] - 2702:26
associations [1] - 2690:39
associative [1] - 2643:9
assume [3] - 2631:42, 2671:47, 2686:37
assumed [2] - 2678:46, 2686:36
assuming [2] - 2622:44, 2683:20
assumption [5] - 2631:32, 2631:40, 2637:15, 2637:23, 2678:47
assure [2] - 2611:31, 2638:26
AT [2] - 2718:12, 2718:13
atheist [1] - 2624:42
attached [2] - 2653:1, 2663:43
attack [1] - 2712:47
attacked [2] - 2703:35, 2714:1
attacker [2] - 2715:1
attempt [2] - 2619:20, 2645:36
attendance [2] - 2628:2, 2647:42
attention [6] - 2608:47, 2612:8, 2628:28, 2630:14, 2632:29, 2632:36
attentions [1] - 2630:25
attitude [1] - 2620:1
attribute [1] - 2715:37
attributed [1] - 2612:35
attributes [1] - 2615:16
attribution [3] - 2638:26, 2661:8, 2677:14
Austin [2] - 2664:19, 2670:14
Australia [4] - 2608:31, 2609:5, 2640:32, 2647:44
Australian [1] - 2618:35
authorities [1] - 2659:24
authors [3] - 2613:32, 2642:34
available [6] - 2628:1, 2630:11, 2632:25, 2633:33, 2633:34, 2679:17
averse [1] - 2618:38
awarded [1] - 2608:38
aware [6] - 2630:19, 2637:27, 2650:6, 2655:8, 2657:9, 2671:37
awful [1] - 2640:39
-
- B**
-
- b** [1] - 2695:22
background [4] - 2608:37, 2608:39, 2609:26, 2627:26
backtrack [3] - 2654:9, 2654:12, 2654:13
bad [1] - 2653:44
badge [1] - 2609:1
badly [2] - 2654:20, 2663:27
balance [2] - 2656:8, 2671:46
bandying [1] - 2711:41
bang [1] - 2626:39
Bar [5] - 2611:19, 2611:26, 2699:33, 2700:8, 2700:19
based [3] - 2608:24, 2622:21, 2671:29
basic [3] - 2674:11, 2674:46, 2675:4
basis [10] - 2614:8, 2614:19, 2632:44, 2632:46, 2649:31, 2677:18, 2690:36, 2698:32, 2699:20, 2714:2
BCI [20] - 2614:8, 2614:16, 2628:21, 2628:29, 2629:14, 2630:13, 2630:19, 2641:35, 2641:40, 2643:39, 2644:6, 2644:40, 2645:15, 2645:17, 2645:18, 2645:32, 2646:28, 2646:41, 2647:4, 2647:8
BCIF [9] - 2660:18, 2668:24, 2672:45, 2673:18, 2674:23, 2678:40, 2684:9, 2687:38, 2688:33
BCIRF [2] - 2641:32, 2659:25
bear [1] - 2634:26
beat [1] - 2635:42
beats [2] - 2608:45, 2638:43
became [5] - 2616:47, 2623:8, 2623:40, 2624:13, 2655:8
become [2] - 2621:15, 2647:5
becomes [1] - 2637:38
beg [1] - 2693:13
begin [3] - 2648:2, 2655:39, 2690:45
beginning [7] - 2660:43, 2682:12, 2683:9, 2687:21, 2688:27, 2701:14, 2701:26
begins [1] - 2683:36
behaviour [1] - 2635:7
behind [1] - 2660:4
beholden [1] - 2634:33
beings [1] - 2641:10
belief [1] - 2713:1
belonging [1] - 2700:41
belonging-ness [1] - 2700:41
below [1] - 2660:43
beside [1] - 2673:41
best [13] - 2613:44, 2623:10, 2623:24, 2625:3, 2625:39, 2626:8, 2626:40, 2629:39, 2631:4, 2631:7, 2660:35, 2680:47, 2710:42
bets [1] - 2670:26
better [4] - 2637:39, 2660:12, 2709:14, 2715:41
between [15] - 2608:28, 2608:39, 2620:2, 2620:39, 2636:5, 2643:4, 2644:31, 2649:24, 2649:25, 2662:34, 2663:3, 2663:14, 2663:27, 2676:39, 2701:44
bewildering [2] - 2633:47, 2644:42
beyond [11] - 2628:35, 2628:47, 2629:15, 2629:23, 2629:29, 2629:43, 2658:16, 2658:27, 2671:39, 2672:8, 2690:23
bias [116] - 2607:21, 2607:41, 2621:10, 2629:25, 2629:37, 2630:22, 2631:28, 2635:24, 2640:35, 2642:5, 2643:5, 2645:10, 2645:16, 2650:47, 2652:24, 2657:2, 2658:23, 2661:6, 2663:29, 2665:23, 2665:25, 2665:46, 2666:13, 2667:29, 2667:34, 2672:11, 2672:12, 2672:47, 2673:21, 2677:9, 2679:5, 2679:18, 2680:23, 2680:24, 2681:31, 2682:13, 2682:18, 2684:19, 2684:35, 2685:2, 2685:37,

- 2686:4, 2688:41,
2690:21, 2690:29,
2690:33, 2690:44,
2691:1, 2691:6,
2691:16, 2691:25,
2691:36, 2691:39,
2691:43, 2692:28,
2692:45, 2693:1,
2693:34, 2695:11,
2695:16, 2695:19,
2695:47, 2696:10,
2696:46, 2697:35,
2698:9, 2698:21,
2698:29, 2699:20,
2699:27, 2699:36,
2699:37, 2701:28,
2702:6, 2702:7,
2702:8, 2702:25,
2702:29, 2702:42,
2703:7, 2703:8,
2703:9, 2703:17,
2703:27, 2703:41,
2703:44, 2704:16,
2705:38, 2706:2,
2706:6, 2706:7,
2706:31, 2707:3,
2711:5, 2711:6,
2712:19, 2712:20,
2712:21, 2712:39,
2712:40, 2712:44,
2712:45, 2713:7,
2713:20, 2713:21,
2715:20, 2715:41,
2716:43, 2717:1,
2717:2, 2717:4
- Bias** [31] - 2628:34,
2643:3, 2649:38,
2650:10, 2651:16,
2652:37, 2658:7,
2658:8, 2658:12,
2658:43, 2671:39,
2682:27, 2689:29,
2689:30, 2689:35,
2689:39, 2689:43,
2689:47, 2690:4,
2690:9, 2702:21,
2702:22, 2705:9,
2706:17, 2709:7,
2709:8, 2709:19,
2710:14, 2710:18
- big** [2] - 2620:39,
2717:2
- binder** [2] - 2651:7,
2651:26
- binders** [5] - 2649:42,
2649:43, 2651:2,
2651:4, 2651:23
- bisexual** [1] - 2640:26
- bit** [24] - 2611:25,
2617:34, 2618:16,
2618:27, 2618:29,
2620:17, 2622:28,
2623:35, 2629:5,
2629:38, 2640:12,
2642:38, 2654:9,
2660:25, 2660:28,
2663:23, 2664:21,
2680:43, 2680:44,
2687:7, 2687:8,
2688:30, 2695:31
- biting** [1] - 2627:29
- bits** [2] - 2679:17,
2681:20
- bitten** [2] - 2627:27,
2627:34
- bizarre** [1] - 2637:35
- blah** [8] - 2615:7,
2615:9
- blank** [5] - 2651:17,
2652:21, 2652:47,
2669:8, 2669:10
- blanks** [1] - 2651:23
- BMW** [1] - 2617:38
- board** [1] - 2710:43
- body** [13] - 2638:37,
2692:7, 2692:15,
2692:16, 2692:20,
2692:23, 2697:29,
2697:30, 2697:44,
2698:2, 2698:8,
2716:21, 2716:24
- bolts** [1] - 2617:41
- book** [3] - 2611:45,
2612:7, 2628:7
- bottom** [16] - 2641:30,
2641:45, 2656:15,
2656:47, 2659:2,
2659:19, 2690:29,
2692:7, 2692:15,
2692:20, 2692:24,
2697:29, 2697:30,
2697:44, 2698:8,
2713:44
- bought** [4] - 2623:36,
2628:7, 2628:8,
2628:16
- box** [6] - 2607:2,
2617:22, 2617:23,
2617:46, 2668:17
- boxes** [3] - 2616:12,
2616:43, 2617:15
- Braw** [2] - 2620:36,
2625:27
- bread** [1] - 2626:41
- break** [14] - 2624:20,
2625:7, 2625:10,
2648:4, 2648:6,
2648:9, 2667:30,
2667:44, 2667:45,
2668:7, 2668:29,
2668:31, 2668:34,
2705:30
- breakdown** [1] -
2705:37
- briefly** [2] - 2633:6,
2715:24
- bring** [4] - 2616:9,
2622:35, 2623:23,
2704:34
- bringing** [2] - 2615:21,
2714:2
- broader** [1] - 2668:40
- broadest** [1] - 2608:1
- broke** [1] - 2706:39
- brought** [3] - 2632:29,
2653:28, 2666:11
- brush** [1] - 2608:1
- bullet** [1] - 2649:6
- bullets** [1] - 2623:43
- burden** [1] - 2634:26
- burning** [3] - 2663:4,
2677:32, 2678:7
- busy** [1] - 2625:4
- button** [1] - 2630:35
- BY** [2] - 2607:7,
2648:24
-
- C**
-
- Caitlin** [1] - 2606:33
- calculated** [3] -
2639:43, 2701:43,
2701:45
- calculating** [1] -
2655:2
- calibrate** [1] - 2607:22
- Camporeale** [1] -
2606:32
- candid** [2] - 2625:34,
2626:8
- candidly** [2] - 2643:29,
2647:12
- cannot** [4] - 2671:29,
2684:38, 2691:12,
2691:43
- capable** [2] - 2665:1,
2681:36
- capitulation** [1] -
2671:22
- capture** [2] - 2679:6,
2679:25
- captured** [4] -
2620:10, 2679:5,
2679:7, 2700:43
- capturing** [1] -
2640:11
- car** [3] - 2617:38,
2617:40, 2620:47
- cardboard** [1] -
2616:12
- care** [1] - 2620:4
- careful** [3] - 2620:44,
2668:6, 2686:35
- carefully** [2] -
2686:34, 2686:38
- carry** [1] - 2659:45
- cars** [3] - 2617:31,
2617:32, 2617:39
- case** [45] - 2616:44,
2618:13, 2622:7,
2624:26, 2624:36,
2629:32, 2630:4,
2631:28, 2637:28,
2637:32, 2640:24,
2650:36, 2652:10,
2652:12, 2652:25,
2653:18, 2653:30,
2656:29, 2658:12,
2661:9, 2663:9,
2668:11, 2673:14,
2675:30, 2677:45,
2685:5, 2687:27,
2692:7, 2697:34,
2697:43, 2698:20,
2703:10, 2703:11,
2703:19, 2707:27,
2709:3, 2712:41,
2712:43, 2712:45,
2713:44, 2714:3,
2714:11, 2714:15,
2717:47
- cases** [46] - 2607:17,
2607:40, 2610:10,
2615:4, 2615:32,
2617:45, 2619:29,
2619:34, 2619:36,
2620:26, 2624:29,
2629:30, 2636:47,
2637:27, 2638:45,
2639:32, 2639:33,
2649:41, 2651:24,
2651:27, 2651:40,
2651:44, 2653:9,
2656:23, 2672:11,
2673:21, 2689:7,
2692:3, 2692:23,
2698:2, 2699:26,
2699:27, 2699:35,
2703:19, 2703:33,
2704:35, 2706:31,
2708:20, 2708:38,
2708:45, 2712:34,
2713:34, 2713:35,
2716:6, 2717:10
- catalogue** [1] - 2609:7
- catch** [1] - 2696:22
- catch-all** [1] - 2696:22
- catching** [1] - 2679:28
- categorical** [4] -
2690:34, 2690:36,
2695:34, 2702:38
- categories** [22] -
2615:18, 2628:3,
2628:4, 2628:47,
2629:19, 2629:24,
2635:45, 2656:36,
2658:3, 2680:19,
2680:32, 2681:30,
2681:46, 2682:2,
2689:28, 2689:34,
2689:35, 2710:28,
2710:29, 2710:39,
2711:17, 2711:18
- categorisation** [1] -
2681:22
- categorise** [3] -
2612:19, 2640:7,
2708:19
- categorised** [3] -
2712:43, 2712:44,
2715:15
- categorising** [1] -
2707:8
- category** [30] -
2619:29, 2620:22,
2628:34, 2629:15,
2629:19, 2629:37,
2629:44, 2639:47,
2640:3, 2640:8,
2640:35, 2641:3,
2641:16, 2690:3,
2690:5, 2690:15,
2690:19, 2698:27,
2699:26, 2700:42,
2704:23, 2705:9,
2710:18, 2711:9,
2711:42, 2712:45,
2714:1, 2714:15,
2715:8, 2717:10
- caught** [1] - 2637:9
- caused** [1] - 2710:45
- causes** [4] - 2669:36,
2690:37, 2701:29,
2702:39
- caveat** [4] - 2673:26,
2673:29, 2673:34,
2694:45
- caveats** [2] - 2697:16,
2697:18
- cent** [1] - 2622:27
- centre** [1] - 2717:4
- certain** [8] - 2607:40,
2607:41, 2611:5,
2618:41, 2619:12,
2639:36, 2641:17,
2708:15
- certainly** [22] -
2607:38, 2608:41,
2611:8, 2612:34,
2617:16, 2617:19,

- 2623:7, 2623:13,
2628:3, 2631:47,
2632:46, 2636:37,
2637:27, 2637:36,
2640:13, 2640:21,
2640:38, 2645:18,
2650:19, 2653:41,
2717:25
- cetera** [20] - 2607:41,
2608:46, 2616:14,
2616:20, 2617:47,
2622:23, 2624:11,
2624:30, 2627:34,
2636:38, 2636:40,
2640:38, 2663:4,
2663:5, 2684:24,
2686:6, 2690:35,
2697:14, 2702:31,
2711:37
- chain** [5] - 2654:14,
2708:29, 2711:27,
2715:25, 2715:26
- chalking** [1] - 2615:14
- challenge** [1] -
2631:21
- change** [4] - 2607:30,
2615:11, 2642:23,
2716:2
- changes** [2] -
2683:28, 2683:30
- characterise** [2] -
2633:27, 2677:20
- characterised** [2] -
2675:22, 2688:40
- characteristic** [2] -
2668:34, 2669:30
- characteristics** [6] -
2669:5, 2676:40,
2677:8, 2679:6,
2679:7, 2681:2
- charge** [2] - 2622:20,
2622:33
- charging** [1] - 2622:26
- chase** [1] - 2693:47
- check** [5] - 2613:14,
2617:38, 2630:37,
2654:4, 2666:36
- checklist** [3] -
2711:34, 2711:47,
2712:10
- chew** [3] - 2627:28,
2627:29, 2627:35
- chief** [3] - 2628:3,
2646:5, 2646:6
- children** [1] - 2716:18
- choice** [3] - 2648:8,
2671:29, 2678:44
- chord** [1] - 2616:17
- chose** [1] - 2682:40
- chosen** [1] - 2658:4
- Christmas** [1] -
2610:38
- circumstance** [4] -
2637:1, 2637:10,
2637:30, 2638:39
- circumstances** [3] -
2624:27, 2631:27,
2661:4
- cite** [1] - 2687:16
- cited** [2] - 2659:24,
2687:44
- citing** [1] - 2702:17
- civil** [1] - 2671:46
- clarified** [1] - 2712:19
- clarifying** [1] - 2706:4
- classic** [5] - 2637:8,
2637:13, 2637:24,
2637:26, 2637:31
- classification** [1] -
2712:39
- classified** [1] -
2693:33
- classify** [1] - 2712:33
- classifying** [1] -
2673:20
- clear** [15] - 2617:34,
2624:5, 2633:12,
2642:1, 2658:31,
2666:13, 2666:44,
2668:45, 2676:38,
2676:41, 2689:28,
2690:46, 2696:41,
2704:6, 2708:20
- clearer** [1] - 2607:43
- clearly** [7] - 2607:42,
2612:10, 2638:21,
2642:12, 2675:47,
2676:14, 2681:21
- cliff** [10] - 2636:40,
2692:8, 2692:15,
2692:20, 2692:24,
2692:31, 2697:30,
2697:31, 2697:45,
2698:8
- clifftops** [1] - 2638:43
- close** [2] - 2613:20,
2613:45
- clothes** [1] - 2608:46
- cluster** [2] - 2607:27,
2668:37
- clustering** [1] - 2669:5
- Coakley** [1] -
2630:41, 2661:18,
2670:37, 2687:38,
2688:28, 2688:30,
2717:16, 2717:32,
2717:36, 2717:45,
2718:4
- cobble** [1] - 2623:24
- code** [1] - 2713:32
- coding** [1] - 2713:30
- cogent** [2] - 2644:15,
2644:16
- collaboration** [7] -
2608:12, 2614:33,
2614:44, 2618:7,
2620:8, 2628:20,
2629:23
- collaborative** [2] -
2625:32, 2649:6
- collapsed** [1] - 2713:7
- collated** [1] - 2616:44
- colleague** [2] -
2618:36, 2623:20
- collect** [1] - 2636:35
- collected** [1] -
2616:44
- column** [9] - 2690:8,
2706:5, 2707:38,
2707:39, 2707:41,
2708:11, 2708:14,
2713:36, 2713:39
- columns** [1] - 2706:9
- combinations** [1] -
2678:3
- comfortable** [5] -
2686:32, 2701:8,
2706:26, 2707:7,
2707:9
- comfortably** [1] -
2713:5
- comic** [1] - 2628:10
- comics** [1] - 2628:8
- coming** [6] - 2608:31,
2610:40, 2617:39,
2629:46, 2655:26,
2716:43
- commenced** [1] -
2659:22
- commencing** [1] -
2685:37
- comment** [2] - 2641:2,
2667:22
- comments** [2] -
2657:30, 2716:35
- Comments** [1] -
2667:32
- commercial** [1] -
2622:29
- commission** [1] -
2716:33
- Commission** [3] -
2606:9, 2650:24,
2714:10
- COMMISSION** [1] -
2718:12
- Commissioner** [33] -
2606:15, 2607:13,
2607:14, 2609:21,
2611:37, 2612:8,
2615:41, 2616:23,
2617:6, 2619:24,
2636:28, 2637:46,
2638:12, 2640:6,
2642:8, 2643:38,
2644:24, 2644:34,
2644:36, 2645:14,
2645:21, 2645:35,
2647:38, 2648:1,
2648:16, 2649:26,
2668:23, 2694:26,
2694:33, 2705:19,
2712:42, 2717:21,
2717:27
- COMMISSIONER** [125]
- 2607:1, 2609:45,
2610:28, 2610:33,
2611:18, 2611:25,
2611:45, 2612:14,
2612:26, 2612:33,
2612:43, 2613:4,
2613:13, 2615:39,
2616:3, 2616:29,
2618:19, 2621:41,
2622:38, 2622:44,
2623:1, 2623:47,
2624:20, 2625:13,
2625:19, 2626:13,
2627:7, 2627:38,
2628:31, 2628:39,
2628:47, 2629:5,
2629:11, 2630:2,
2630:8, 2631:31,
2631:36, 2631:40,
2632:43, 2633:14,
2633:24, 2633:32,
2633:42, 2634:6,
2634:23, 2634:43,
2637:15, 2637:23,
2638:2, 2638:14,
2638:20, 2638:25,
2642:12, 2642:20,
2642:29, 2642:44,
2643:12, 2643:42,
2644:1, 2644:26,
2645:25, 2645:39,
2647:11, 2647:35,
2647:40, 2648:4,
2648:14, 2648:19,
2651:46, 2654:36,
2655:5, 2662:46,
2664:24, 2665:27,
2666:25, 2666:36,
2666:40, 2667:3,
2667:42, 2668:10,
2668:16, 2673:32,
2675:46, 2680:30,
2682:6, 2682:36,
2682:40, 2685:19,
2686:44, 2688:18,
2688:22, 2691:39,
- 2691:47, 2692:39,
2693:37, 2694:14,
2694:29, 2694:35,
2694:41, 2695:7,
2696:17, 2697:9,
2699:43, 2700:3,
2700:17, 2700:24,
2701:7, 2704:8,
2704:25, 2705:15,
2705:23, 2705:28,
2705:34, 2709:32,
2709:36, 2710:33,
2714:18, 2714:23,
2714:28, 2717:15,
2717:25, 2717:34,
2717:38, 2717:44,
2718:9
- Commissioner's** [1] -
2624:2
- commit** [3] - 2636:19,
2640:45, 2703:13
- commitment** [1] -
2690:39
- commits** [1] - 2706:43
- committed** [3] -
2631:29, 2631:45,
2635:30
- committing** [1] -
2703:12
- common** [2] -
2649:36, 2689:46
- communicated** [2] -
2691:9, 2691:20
- communication** [32] -
2643:9, 2667:37,
2691:2, 2691:6,
2691:13, 2691:29,
2691:31, 2691:42,
2692:7, 2692:14,
2692:29, 2692:30,
2692:46, 2693:10,
2693:31, 2695:36,
2696:1, 2696:3,
2696:4, 2696:9,
2696:11, 2696:20,
2696:30, 2696:32,
2696:35, 2696:45,
2697:12, 2697:13,
2697:19, 2697:35,
2697:37, 2698:6
- communications** [4] -
2691:15, 2695:43,
2696:6, 2696:15
- communications"** [1]
- 2696:23
- community** [17] -
2607:19, 2608:28,
2608:29, 2608:40,
2609:23, 2609:36,
2610:45, 2611:12,

2611:42, 2612:10,
2632:40, 2635:2,
2635:17, 2635:31,
2635:32, 2675:40
comparable [1] -
2624:36
complain [1] -
2644:30
complete [2] -
2670:42, 2694:11
completed [14] -
2649:38, 2650:7,
2650:47, 2651:39,
2651:41, 2651:42,
2652:11, 2652:20,
2652:24, 2652:25,
2653:12, 2653:13,
2653:21, 2654:3
completed" [1] -
2652:18
completely [1] -
2617:3
completing [1] -
2651:43
completion [1] -
2668:33
complex [5] -
2620:40, 2694:27,
2694:29, 2694:37,
2715:37
complicate [1] -
2640:16
complicated [6] -
2607:26, 2608:26,
2610:10, 2615:9,
2640:9, 2640:12
component [2] -
2698:28, 2703:6
components [3] -
2681:1, 2695:11,
2695:16
comprised [1] -
2657:1
compromised [1] -
2664:47
computers [2] -
2616:21, 2628:17
concepts [1] -
2623:42
conceptual [1] -
2688:4
concern [4] - 2607:18,
2607:26, 2607:27,
2607:28
concerned [1] -
2679:9
concerning [6] -
2607:10, 2610:8,
2611:42, 2659:24,
2661:8, 2677:45
concerns [2] -
2609:37, 2630:19
concise [1] - 2681:36
conclude [1] -
2647:36
concluded [1] -
2647:38
conclusion [1] -
2672:46
conclusions [1] -
2671:25
concocted [1] -
2640:26
concord [1] - 2608:7
concordance [5] -
2615:27, 2677:1,
2677:14, 2682:22,
2686:7
**concordance-
seeking** [2] -
2682:22, 2686:7
conduct [1] - 2614:8
confer [1] - 2646:1
conference [1] -
2633:16
conferences [4] -
2628:2, 2628:5,
2633:17
conferred [1] -
2645:46
conferring [1] -
2637:18
confidence [1] -
2679:35
configuration [1] -
2665:33
confirming [1] -
2698:25
conflict [5] - 2608:39,
2715:40, 2716:43,
2717:1, 2717:3
confront [1] - 2643:17
confusing [3] -
2640:19, 2660:1,
2660:3
confusion [1] -
2652:32
conjure [2] - 2634:3,
2634:33
connected [1] -
2643:10
consensus [15] -
2608:11, 2614:39,
2614:40, 2614:44,
2618:7, 2619:21,
2620:5, 2620:8,
2628:20, 2629:22,
2630:20, 2682:21,
2708:44, 2709:27,
2710:45
consequence [2] -
2623:35, 2642:5
consequences [1] -
2673:23
consider [1] - 2693:21
consideration [3] -
2686:35, 2709:17,
2716:40
considered [3] -
2686:38, 2696:46,
2716:36
considering [2] -
2686:34, 2692:23
consistent [2] -
2617:38, 2713:24
consternation [1] -
2607:18
constituent [2] -
2668:40
constituents [1] -
2668:39
constraints [1] -
2665:17
constructed [1] -
2659:41
constructing [1] -
2609:12
contact [3] - 2607:31,
2609:36, 2621:21
contain [2] - 2698:27,
2699:12
contained [4] -
2629:14, 2634:19,
2657:6, 2663:10
contemporaneous [1] -
2690:38
content [6] - 2612:44,
2612:47, 2633:19,
2647:3, 2667:22,
2705:21
contents [1] - 2626:31
context [14] - 2613:7,
2620:46, 2627:22,
2640:25, 2641:4,
2663:16, 2665:31,
2665:32, 2665:33,
2667:14, 2670:7,
2673:44, 2684:16,
2701:40
contexts [3] - 2611:5,
2639:29, 2641:17
continue [2] - 2623:1,
2637:21
contrary [1] - 2708:21
contributing [1] -
2699:38
control [1] - 2617:38
convenient [3] -
2717:13, 2717:15,
2718:5
conversation [2] -
2608:2, 2620:36
conversations [2] -
2620:47, 2664:5
conveyed [1] -
2619:30
copy [5] - 2613:8,
2613:15, 2628:6,
2682:10
Coroner [1] - 2624:44
corpus [1] - 2663:34
correct [23] - 2621:27,
2625:22, 2628:42,
2630:6, 2630:15,
2632:4, 2636:6,
2636:14, 2636:17,
2651:6, 2662:10,
2674:40, 2682:29,
2689:25, 2689:31,
2690:41, 2691:5,
2692:29, 2693:26,
2695:37, 2710:23,
2710:25
correctly [2] -
2625:38, 2640:44
correlate [1] - 2613:44
counsel [3] - 2700:20,
2701:26, 2714:11
Counsel [22] -
2606:30, 2606:31,
2607:10, 2608:16,
2612:17, 2613:18,
2614:32, 2627:41,
2628:20, 2630:11,
2632:32, 2632:36,
2632:37, 2633:7,
2633:10, 2633:27,
2633:44, 2635:47,
2636:27, 2638:5,
2641:31, 2644:38
counted [4] - 2639:46,
2640:2, 2713:21
counterbalance [1] -
2642:37
counts [1] - 2642:5
couple [10] - 2618:30,
2651:33, 2667:4,
2670:46, 2686:47,
2687:36, 2688:9,
2713:34, 2713:40,
2715:29
course [21] - 2607:31,
2607:37, 2615:18,
2616:16, 2617:10,
2617:22, 2624:34,
2630:18, 2630:38,
2631:13, 2631:17,
2633:34, 2637:1,
2646:10, 2650:20,
2651:10, 2655:39,
2657:6, 2681:7,
2692:36, 2713:28
cover [1] - 2677:7
cracks [1] - 2614:28
Craig [1] - 2620:14
Crandell [9] - 2609:21,
2610:44, 2616:23,
2616:37, 2619:24,
2629:5, 2643:20,
2649:26, 2712:42
Crandell's [3] -
2607:15, 2612:8,
2617:7
created [2] - 2683:39,
2710:38
Crime [31] - 2628:34,
2649:38, 2650:10,
2651:16, 2652:37,
2658:7, 2658:8,
2658:13, 2658:43,
2671:39, 2682:27,
2689:31, 2689:35,
2689:39, 2689:47,
2690:4, 2690:29,
2690:33, 2690:44,
2691:1, 2695:11,
2702:7, 2702:21,
2705:9, 2706:17,
2709:8, 2709:19,
2710:19
crime [87] - 2620:45,
2621:10, 2629:24,
2629:25, 2631:28,
2631:45, 2635:8,
2635:15, 2635:16,
2635:30, 2635:39,
2639:12, 2639:13,
2650:47, 2652:24,
2661:8, 2665:23,
2665:47, 2666:13,
2667:29, 2668:31,
2668:33, 2672:11,
2677:9, 2679:5,
2679:18, 2679:37,
2680:24, 2682:13,
2682:18, 2682:19,
2684:19, 2684:20,
2684:35, 2685:2,
2685:37, 2686:4,
2688:41, 2690:21,
2691:6, 2691:16,
2691:18, 2691:23,
2691:29, 2691:36,
2691:40, 2691:43,
2692:28, 2692:45,
2693:2, 2693:34,
2695:16, 2695:19,
2695:47, 2696:10,
2696:46, 2696:47,
2697:35, 2698:9,

- 2698:21, 2698:28,
2699:27, 2699:36,
2701:28, 2702:7,
2702:25, 2702:44,
2703:7, 2703:9,
2703:17, 2703:27,
2703:28, 2703:30,
2703:41, 2703:44,
2706:43, 2711:6,
2712:19, 2717:3,
2717:4
- Crime** [2] - 2689:43,
2710:14
- crime** [1] - 2665:25
- crimes** [29] - 2606:11,
2607:21, 2607:47,
2620:43, 2630:22,
2632:11, 2635:1,
2636:5, 2636:10,
2636:18, 2636:29,
2636:30, 2637:47,
2638:34, 2639:36,
2639:39, 2639:43,
2639:44, 2639:45,
2640:2, 2640:8,
2706:2, 2706:7
- Criminal** [1] - 2701:4
- criminal** [10] - 2609:9,
2634:26, 2634:29,
2643:10, 2658:28,
2690:36, 2700:34,
2701:41, 2702:25,
2703:1
- criminologist** [3] -
2616:9, 2619:8,
2619:10
- criminologists** [1] -
2631:14
- criminology** [2] -
2622:16, 2631:9
- criteria** [1] - 2677:16
- criterion** [1] - 2671:39
- critical** [2] - 2609:8,
2609:10
- critically** [1] - 2654:25
- criticise** [1] - 2705:4
- criticised** [3] -
2608:30, 2614:16,
2631:3
- criticism** [5] - 2636:1,
2639:37, 2642:21,
2688:8, 2704:28
- criticisms** [1] -
2664:15
- cross** [3] - 2645:46,
2651:13, 2678:7
- cross-examining** [1] -
2645:46
- cross-purposes** [1] -
2651:13
- crossed** [1] - 2678:8
- crosses** [2] - 2663:4,
2677:32
- crude** [5] - 2615:17,
2640:17, 2672:45,
2676:4, 2677:5
- crudely** [3] - 2622:9,
2626:39, 2679:29
- crunched** [1] -
2622:23
- culture** [1] - 2628:9
- cumulative** [2] -
2693:20, 2695:19
- curiosity** [2] -
2626:24, 2626:28
- curriculum** [2] -
2662:3, 2662:7
- cursorily** [1] - 2630:47
-
- D**
-
- Dalton** [37] - 2607:1,
2607:9, 2610:29,
2611:39, 2612:46,
2616:32, 2623:4,
2625:16, 2629:13,
2633:35, 2634:7,
2634:28, 2634:47,
2637:23, 2643:20,
2643:34, 2644:3,
2644:19, 2644:36,
2645:26, 2645:40,
2646:13, 2647:42,
2648:7, 2648:47,
2650:17, 2650:20,
2654:37, 2654:45,
2655:27, 2682:45,
2683:16, 2708:33,
2708:37, 2710:23,
2711:27, 2715:33
- DALTON** [1] - 2607:5
- Dalton's** [3] - 2632:47,
2646:9, 2713:9
- danger** [1] - 2640:35
- Danielle** [1] - 2625:30
- dare** [1] - 2622:31
- dark** [1] - 2630:26
- data** [6] - 2620:10,
2620:45, 2631:18,
2673:14, 2676:11,
2676:16
- database** [1] - 2630:32
- days** [1] - 2626:29
- DE** [1] - 2648:22
- de** [25] - 2607:11,
2613:29, 2615:27,
2625:30, 2625:39,
2629:17, 2632:1,
2641:22, 2643:20,
2646:47, 2648:5,
2648:8, 2648:17,
2648:26, 2651:46,
2652:33, 2655:43,
2666:40, 2668:16,
2668:22, 2670:11,
2683:15, 2717:28,
2717:45
- dead** [7] - 2624:35,
2625:1, 2635:9,
2635:12, 2637:1,
2638:37, 2638:42
- deal** [5] - 2619:18,
2655:20, 2661:6,
2687:26, 2700:24
- dealt** [1] - 2671:45
- death** [2] - 2624:26,
2678:4
- deaths** [3] - 2607:28,
2624:25, 2636:40
- debating** [2] - 2711:1,
2711:5
- deceased** [3] -
2714:19, 2714:32,
2714:35
- decks** [1] - 2666:44
- decriminalisation** [2]
- 2609:13, 2609:14
- dedicated** [1] - 2621:2
- deed** [1] - 2643:10
- deemed** [4] - 2643:2,
2644:12, 2649:27,
2649:28
- defect** [1] - 2669:21
- defects** [1] - 2669:39
- defending** [1] - 2713:5
- defensive** [1] -
2701:43
- deferential** [1] -
2619:4
- deficiency** [1] -
2614:28
- defined** [2] - 2636:9,
2697:13
- defining** [1] - 2702:22
- definitely** [1] -
2619:37
- definition** [27] -
2668:38, 2676:41,
2689:6, 2690:29,
2690:33, 2690:44,
2690:46, 2690:47,
2695:11, 2695:16,
2695:20, 2696:1,
2696:9, 2696:29,
2697:3, 2698:31,
2698:35, 2698:45,
2701:28, 2702:6,
2702:11, 2702:17,
2702:21, 2702:23,
2702:32, 2702:34,
2702:37
- degree** [16] - 2639:39,
2653:27, 2676:15,
2691:13, 2693:23,
2695:41, 2696:5,
2696:14, 2696:21,
2697:14, 2700:29,
2700:34, 2700:37,
2701:4, 2701:42,
2703:2
- delay** [1] - 2638:23
- deliver** [2] - 2665:42,
2684:38
- delivering** [2] -
2623:31, 2665:1
- demonstrate** [1] -
2651:26
- Dempsey** [1] -
2710:11
- denunciatory** [2] -
2643:8, 2690:40
- department** [1] -
2622:16
- dependent** [9] -
2653:22, 2653:27,
2653:45, 2654:2,
2678:44, 2682:20,
2682:33, 2684:21,
2685:20
- depth** [1] - 2617:3
- DEREK** [1] - 2607:5
- Derek** [7] - 2649:25,
2649:27, 2650:2,
2708:33, 2711:27,
2711:31, 2715:33
- derived** [3] - 2658:38,
2658:47, 2668:44
- describe** [5] -
2629:16, 2633:15,
2661:4, 2661:5,
2677:22
- described** [6] -
2659:47, 2663:35,
2676:38, 2683:38,
2693:17, 2703:16
- describes** [4] -
2631:24, 2631:26,
2631:43, 2631:44
- describing** [2] -
2663:20, 2715:38
- description** [2] -
2673:4, 2681:27
- deserved** [1] -
2621:16
- deserving** [1] -
2641:16
- designated** [1] -
2687:14
- designation** [1] -
2643:5
- desire** [1] - 2637:42
- desired** [1] - 2628:16
- despite** [4] - 2608:7,
2613:34, 2679:28,
2679:29
- detail** [3] - 2610:38,
2615:33, 2615:35
- details** [1] - 2614:46
- detected** [1] - 2677:27
- Detective** [1] -
2619:16
- detective** [1] - 2616:15
- detectives** [4] -
2616:24, 2616:38,
2617:47, 2656:28
- determination** [2] -
2665:18, 2685:11
- determine** [5] -
2607:20, 2616:42,
2631:28, 2665:24,
2692:9
- develop** [2] - 2664:18,
2665:36
- developed** [10] -
2642:31, 2644:5,
2644:46, 2646:37,
2658:42, 2661:34,
2662:18, 2662:19,
2662:23, 2685:5
- developing** [1] -
2712:9
- development** [1] -
2669:27
- deviant** [1] - 2609:12
- device** [4] - 2677:7,
2679:25, 2679:26,
2679:27
- devices** [3] - 2675:40,
2682:22, 2686:8
- devise** [3] - 2669:45,
2673:41, 2681:30
- devised** [1] - 2681:45
- dialogue** [1] - 2623:2
- dictate** [1] - 2623:22
- difference** [2] -
2636:5, 2716:32
- differences** [1] -
2657:27
- different** [53] -
2607:42, 2608:29,
2608:32, 2610:35,
2611:47, 2615:18,
2615:21, 2616:20,
2616:24, 2617:47,
2619:36, 2620:18,
2624:33, 2628:43,
2629:34, 2630:11,
2630:12, 2630:29,
2642:9, 2642:15,
2643:14, 2645:16,

- 2654:7, 2654:8,
2654:10, 2658:33,
2659:42, 2665:32,
2670:7, 2671:35,
2671:36, 2672:1,
2672:2, 2675:38,
2677:13, 2677:23,
2678:3, 2678:33,
2681:1, 2688:4,
2689:21, 2689:34,
2691:28, 2696:44,
2697:20, 2698:27,
2702:3, 2703:2,
2712:17
- differentiate** [3] -
2644:8, 2645:4,
2645:16
- differently** [3] -
2629:38, 2654:2,
2706:41
- difficult** [17] - 2621:6,
2627:5, 2664:18,
2665:16, 2665:36,
2668:43, 2669:22,
2669:28, 2669:44,
2672:6, 2675:43,
2679:3, 2692:6,
2694:27, 2694:37,
2698:9
- difficulties** [1] -
2665:40
- difficulty** [6] -
2662:24, 2662:25,
2664:6, 2669:36,
2676:30, 2676:46
- digression** [1] -
2618:45
- dimensions** [1] -
2661:5
- direct** [4] - 2644:2,
2645:45, 2686:19,
2694:43
- directed** [3] - 2690:34,
2695:36, 2696:2
- directly** [2] - 2694:24,
2694:44
- Director** [1] - 2606:32
- disaggregating** [2] -
2629:38, 2635:22
- disagree** [4] -
2675:13, 2676:22,
2676:25, 2713:17
- disagreement** [2] -
2620:2, 2708:45
- discarded** [1] -
2641:40
- discern** [1] - 2692:37
- discernible** [1] -
2610:11
- disclose** [2] - 2644:40,
2645:30
- disclosed** [1] -
2641:39
- discloses** [1] -
2643:38
- disclosure** [1] -
2644:22
- discount** [1] - 2622:27
- discounted** [1] -
2639:45
- discover** [3] -
2681:19, 2691:34,
2691:37
- discovered** [4] -
2634:20, 2679:35,
2679:39, 2691:8
- discovering** [3] -
2677:11, 2691:19
- discrete** [1] - 2669:31
- discretion** [1] -
2694:16
- discrimination** [1] -
2663:28
- discuss** [5] - 2631:47,
2683:1, 2683:24,
2685:38, 2709:43
- discussed** [2] -
2683:21, 2711:31
- discussing** [4] -
2614:47, 2618:42,
2710:17, 2710:23
- discussion** [11] -
2609:42, 2615:15,
2615:17, 2615:31,
2616:10, 2622:11,
2630:3, 2649:24,
2688:3, 2690:45,
2701:27
- discussions** [3] -
2629:42, 2629:46,
2637:28
- disgruntled** [1] -
2621:22
- disgruntlement** [1] -
2621:9
- dissipated** [1] -
2618:17
- distinct** [3] - 2617:44,
2679:13, 2713:32
- distinction** [8] -
2640:18, 2644:31,
2662:31, 2663:3,
2663:14, 2690:24,
2701:44, 2711:7
- distinctions** [1] -
2663:26
- distinguish** [1] -
2638:33
- distinguished** [1] -
2639:36
- distrust** [1] - 2608:27
- disturbs** [1] - 2641:6
- dive** [1] - 2623:16
- dividing** [1] - 2707:9
- divine** [2] - 2692:29,
2692:37
- division** [1] - 2668:30
- doable** [1] - 2624:9
- Doctor** [9] - 2616:3,
2630:2, 2647:28,
2647:31, 2665:39,
2667:43, 2682:40,
2686:10, 2697:11
- doctor** [11] - 2618:19,
2624:20, 2625:10,
2648:19, 2664:24,
2681:35, 2685:41,
2696:17, 2700:6,
2701:7, 2705:30
- doctors** [2] - 2622:33
- document** [36] -
2608:17, 2609:10,
2610:18, 2611:11,
2611:16, 2611:40,
2614:36, 2622:20,
2626:47, 2641:29,
2647:7, 2650:24,
2652:12, 2657:18,
2658:39, 2660:8,
2660:14, 2662:13,
2664:3, 2666:41,
2668:6, 2668:7,
2670:19, 2670:45,
2671:6, 2678:40,
2679:9, 2680:16,
2682:10, 2682:41,
2683:6, 2683:47,
2684:10, 2686:47,
2687:34, 2713:43
- documents** [3] -
2623:42, 2627:4,
2715:32
- doing** [1] - 2623:44
- dollars** [1] - 2628:6
- domain** [1] - 2717:3
- dominate** [1] - 2611:3
- done** [20] - 2613:41,
2614:4, 2614:25,
2615:12, 2615:26,
2618:1, 2618:28,
2623:21, 2623:37,
2626:3, 2627:17,
2653:38, 2660:5,
2679:14, 2681:23,
2685:9, 2688:12,
2706:41, 2713:31,
2716:28
- doubt** [20] - 2619:40,
2629:1, 2629:16,
2629:23, 2629:29,
2629:44, 2638:15,
2643:20, 2643:33,
2644:20, 2649:2,
2658:16, 2658:27,
2671:37, 2671:40,
2672:9, 2690:24,
2696:17, 2696:19,
2696:26
- doubt** [1] - 2628:35
- down** [19] - 2613:8,
2618:40, 2634:1,
2634:14, 2641:45,
2660:17, 2667:30,
2668:29, 2668:31,
2668:34, 2687:6,
2687:7, 2688:25,
2688:26, 2709:43,
2713:43, 2715:21
- Dr** [65] - 2607:1,
2607:9, 2607:11,
2610:29, 2611:39,
2612:46, 2615:27,
2616:32, 2623:4,
2625:16, 2625:30,
2625:39, 2625:40,
2629:13, 2629:17,
2630:40, 2630:41,
2631:24, 2632:47,
2633:35, 2634:7,
2634:28, 2634:47,
2637:23, 2641:14,
2641:15, 2643:20,
2643:34, 2644:3,
2644:19, 2644:36,
2645:26, 2645:40,
2646:9, 2646:13,
2647:42, 2648:5,
2648:7, 2648:8,
2648:16, 2648:17,
2648:26, 2648:47,
2650:17, 2650:20,
2650:21, 2651:46,
2652:33, 2654:37,
2654:45, 2655:27,
2655:43, 2666:40,
2668:16, 2668:22,
2670:11, 2708:33,
2708:37, 2710:23,
2713:9, 2717:28,
2717:45
- draft** [3] - 2683:20,
2683:22, 2707:10
- draw** [2] - 2608:47,
2662:31
- drawing** [3] - 2663:3,
2663:14, 2663:26
- drawings** [1] -
2657:34
- Drawings** [1] -
2667:36
- drawn** [4] - 2632:36,
2662:1, 2662:3,
2662:13
- dread** [1] - 2626:29
- drew** [2] - 2612:7,
2628:28
- driving** [1] - 2620:38
- drop** [1] - 2711:23
- drove** [1] - 2624:16
- drugs** [1] - 2704:35
- due** [3] - 2646:10,
2703:40, 2713:28
- during** [4] - 2607:31,
2607:37, 2621:21,
2629:41
- Dutfield** [1] - 2652:38
- dynamic** [1] - 2618:10
-
- ## E
-
- early** [2] - 2616:10,
2617:21
- earnestly** [1] -
2710:22
- earth** [1] - 2635:5
- easier** [2] - 2614:30,
2687:12
- easiest** [1] - 2613:40
- easily** [3] - 2621:36,
2632:13, 2661:5
- easy** [2] - 2632:14,
2703:34
- edit** [1] - 2628:6
- editor** [1] - 2628:6
- effect** [11] - 2611:9,
2619:25, 2623:25,
2643:17, 2643:39,
2669:38, 2677:19,
2679:15, 2692:40,
2692:43, 2698:28
- effort** [1] - 2620:25
- eight** [5] - 2619:44,
2619:45, 2621:29,
2621:44
- eighteen** [1] - 2651:28
- either** [8] - 2612:41,
2622:21, 2633:19,
2652:16, 2658:22,
2683:27, 2690:8,
2694:45
- elaborate** [3] - 2610:6,
2681:3, 2681:6
- elaboration** [1] -
2696:3
- element** [8] - 2677:3,
2678:41, 2680:22,
2680:25, 2691:30,
2693:14, 2693:16,
2694:41
- elemental** [1] -

2679:30
elements [17] -
2660:1, 2664:17,
2665:46, 2666:8,
2666:13, 2667:35,
2668:31, 2668:32,
2669:6, 2669:13,
2670:21, 2676:40,
2678:37, 2678:38,
2679:1, 2679:39
elsewhere [1] -
2690:27
email [2] - 2708:29,
2715:32
emails [2] - 2620:13,
2715:26
embarking [1] -
2664:13
embedded [3] -
2663:29, 2671:40,
2671:41
embellish [1] - 2626:3
embellishment [1] -
2626:9
embroiled [1] -
2608:33
emerge [1] - 2673:43
emotional [1] -
2624:17
emphasis [1] -
2635:46
emphases [1] -
2680:14
empirical [3] -
2644:28, 2676:10,
2676:16
employed [1] -
2622:16
employee [1] -
2622:15
employing [1] -
2675:31
enable [1] - 2675:11
encouragement [1] -
2608:9
end [13] - 2612:17,
2629:46, 2635:9,
2637:10, 2638:36,
2638:39, 2645:44,
2680:16, 2686:39,
2687:25, 2691:43,
2693:33, 2703:8
ended [7] - 2619:35,
2621:45, 2656:36,
2660:3, 2711:9,
2713:30, 2715:20
endorse [11] -
2613:41, 2659:12,
2676:28, 2676:34,
2676:43, 2680:31,
2680:40, 2681:17,
2681:28, 2681:39,
2681:47
endorsed [3] -
2614:29, 2682:44,
2683:16
ends [2] - 2635:12,
2637:1
endures [2] - 2636:44,
2640:36
energy [1] - 2630:37
engage [1] - 2607:25
engaged [3] -
2607:12, 2613:38,
2614:21
engines [1] - 2630:33
English [2] - 2632:8,
2632:9
enhance [1] - 2626:4
enlarged [1] - 2696:20
ensues [1] - 2704:38
ensure [1] - 2679:39
entailed [2] - 2614:45,
2655:2
enthused [1] -
2659:36
entirely [3] - 2653:22,
2671:7, 2678:43
entirety [1] - 2670:17
entitled [4] - 2640:45,
2676:8, 2694:44,
2718:4
entrap [1] - 2608:45
Enzo [1] - 2606:32
equal [1] - 2677:11
equally [1] - 2677:12
era [4] - 2639:2,
2640:13, 2640:29,
2640:39
erroneous [1] -
2628:39
error [1] - 2629:9
essays [1] - 2623:31
essence [1] - 2610:34
essential [8] -
2695:28, 2695:47,
2696:10, 2696:45,
2697:2, 2697:12,
2697:15
establish [1] -
2665:22
established [1] -
2653:33
Establishment [1] -
2628:34
et [22] - 2607:41,
2608:46, 2616:14,
2616:20, 2617:47,
2622:23, 2624:11,
2624:30, 2627:34,
2636:38, 2636:40,
2640:38, 2662:20,
2663:4, 2663:5,
2664:16, 2684:24,
2686:6, 2690:35,
2697:14, 2702:31,
2711:37
etc [1] - 2712:2
ethics [1] - 2618:40
evaluation [18] -
2651:44, 2655:33,
2655:39, 2682:11,
2682:12, 2682:13,
2682:18, 2682:21,
2682:33, 2684:19,
2684:22, 2684:35,
2685:21, 2685:37,
2686:1, 2686:4,
2712:3
event [5] - 2634:30,
2637:5, 2650:43,
2654:15, 2705:20
events [1] - 2703:9
everywhere [1] -
2647:7
Evidence [9] - 2658:7,
2658:8, 2689:30,
2689:35, 2689:39,
2689:42, 2689:47,
2690:12, 2706:16
evidence [30] -
2611:19, 2611:25,
2612:18, 2612:23,
2623:2, 2629:6,
2636:9, 2639:42,
2643:18, 2646:5,
2646:9, 2647:32,
2658:12, 2661:23,
2668:45, 2669:1,
2669:4, 2672:11,
2672:18, 2692:39,
2692:41, 2692:43,
2697:40, 2698:1,
2699:26, 2699:27,
2699:36, 2699:37,
2708:20
evidence-in-chief [1] -
2646:5
evidence/
information [1] -
2658:15
exactly [3] - 2710:37,
2710:40, 2712:43
exaggerating [2] -
2621:35, 2621:36
examination [1] -
2650:36
examining [1] -
2645:46
example [15] -
2608:44, 2611:46,
2634:40, 2637:8,
2644:26, 2652:29,
2653:22, 2656:39,
2657:17, 2666:10,
2666:17, 2676:19,
2677:31, 2688:24,
2692:6
examples [5] -
2636:47, 2704:45,
2705:3, 2713:34,
2713:40
exceedingly [1] -
2675:43
except [1] - 2697:33
exception [1] - 2673:6
excessive [1] - 2712:1
exchange [1] -
2644:20
excited [2] - 2625:31,
2700:3
excitement [3] -
2626:17, 2626:23,
2626:29
exciting [2] - 2625:40,
2625:42
excluded [2] -
2703:28, 2703:47
excluding [1] -
2703:16
excuse [6] - 2640:41,
2692:27, 2693:42,
2694:8, 2697:2,
2697:43
excused [1] - 2647:42
exercise [13] -
2607:12, 2613:38,
2614:9, 2614:21,
2614:43, 2614:45,
2626:9, 2655:29,
2659:41, 2667:5,
2675:31, 2685:12
exhibit [3] - 2655:43,
2666:34, 2689:22
existed [1] - 2621:11
existence [2] -
2640:23, 2653:24
exists [2] - 2631:6,
2658:15
expand [1] - 2695:40
expanding [1] -
2696:28
expands [1] - 2672:21
expect [2] - 2718:1,
2718:2
expectations [1] -
2677:13
expected [1] - 2707:9
expensive [1] - 2628:8
experience [4] -
2611:41, 2615:24,
2616:6, 2616:16
experimental [4] -
2665:34, 2678:41,
2679:40, 2680:23
expert [1] - 2650:27
expertise [3] - 2612:1,
2634:40, 2686:21
explain [6] - 2617:9,
2618:13, 2637:39,
2638:34, 2640:6,
2640:22
explained [5] -
2643:22, 2646:31,
2676:29, 2703:34,
2712:30
explains [1] - 2641:13
explanation [1] -
2711:11
explore [4] - 2626:24,
2628:9, 2700:45,
2707:19
explored [3] -
2608:42, 2608:44,
2609:3
exploring [1] -
2617:13
express [5] - 2630:18,
2642:14, 2642:22,
2642:24, 2685:3
expressed [5] -
2643:36, 2672:38,
2685:9, 2695:34,
2696:11
expresses [4] -
2690:33, 2691:1,
2695:35, 2697:5
expressing [4] -
2680:17, 2696:29,
2702:38, 2707:45
expression [4] -
2643:7, 2693:23,
2695:40, 2696:4
expressions [1] -
2696:20
expressly [1] -
2645:25
extent [4] - 2610:15,
2610:16, 2653:23,
2664:13
extract [2] - 2684:47,
2704:40
extracted [1] -
2688:31
extracting [1] -
2677:43
extreme [2] - 2624:31

F				
face [5] - 2617:9, 2624:9, 2650:13, 2672:31	2614:2	2629:44, 2636:4, 2649:6, 2650:6, 2656:4, 2656:26, 2656:31, 2657:26, 2667:5, 2671:38, 2671:39, 2673:23, 2681:5, 2685:46, 2693:16, 2695:32, 2697:13, 2708:30, 2716:3	2704:8	2660:34, 2661:34, 2661:41, 2662:20, 2662:37, 2663:8, 2663:16, 2663:30, 2663:42, 2663:43, 2663:47, 2664:6, 2664:17, 2664:18, 2664:39, 2664:40, 2664:46, 2665:12, 2665:18, 2665:22, 2665:23, 2665:42, 2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
fact [18] - 2612:37, 2619:23, 2619:35, 2635:18, 2640:34, 2641:40, 2642:20, 2643:29, 2644:11, 2649:36, 2655:23, 2661:45, 2676:15, 2679:3, 2694:10, 2694:42, 2703:34	FBI [1] - 2613:42	firstly [3] - 2628:24, 2639:42, 2653:22	fond [1] - 2621:25	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
factor [8] - 2673:19, 2699:28, 2701:16, 2701:27, 2701:31, 2706:7, 2707:3, 2714:3	fear [3] - 2608:4, 2619:27	fist [2] - 2626:39, 2653:40	footnote [28] - 2641:46, 2642:13, 2642:23, 2642:37, 2642:41, 2642:46, 2643:13, 2643:16, 2643:18, 2643:26, 2643:30, 2643:38, 2644:12, 2644:22, 2644:29, 2645:27, 2646:17, 2646:22, 2646:44, 2646:46, 2647:15, 2659:1, 2659:8, 2659:9, 2676:33, 2680:40, 2681:18	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
factors [10] - 2615:6, 2615:9, 2639:12, 2639:14, 2643:5, 2660:29, 2665:33, 2684:40, 2687:2, 2699:38	February [4] - 2708:33, 2710:42, 2711:12, 2711:27	fitness [1] - 2661:23	footnotes [1] - 2644:4	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
factually [1] - 2678:3	fee [2] - 2654:40, 2654:45	fitted [1] - 2677:36	Force [6] - 2607:13, 2607:15, 2646:3, 2648:27, 2651:43, 2655:29	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
fail [4] - 2667:27, 2669:35, 2674:46, 2675:3	feedback [2] - 2707:11, 2707:13	five [2] - 2618:2, 2687:39	Force's [1] - 2673:13	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
fails [3] - 2674:11, 2675:6, 2689:18	fell [1] - 2697:32	fixed [2] - 2644:4, 2665:20	forensically [1] - 2645:41	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
failure [1] - 2710:44	felt [7] - 2608:5, 2608:8, 2619:31, 2624:47, 2625:1, 2636:34, 2669:42	flaws [6] - 2664:1, 2664:11, 2664:45, 2665:13, 2669:38, 2675:26	forget [4] - 2615:1, 2622:25, 2624:31, 2712:42	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
fair [9] - 2608:35, 2612:11, 2612:38, 2622:1, 2622:8, 2623:13, 2627:19, 2627:23, 2666:20	few [14] - 2608:41, 2623:37, 2625:21, 2630:13, 2637:46, 2639:21, 2650:21, 2660:38, 2667:23, 2667:47, 2670:45, 2693:43, 2694:38, 2716:21	flesh [1] - 2701:44	forgive [2] - 2714:28	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
fairly [4] - 2608:24, 2617:21, 2631:3, 2642:22	figures [1] - 2705:37	flies [1] - 2679:28	forgotten [1] - 2627:5	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faith [1] - 2624:7	files [6] - 2616:42, 2624:24, 2637:43, 2650:36, 2650:44, 2676:10	Flinders [5] - 2609:28, 2609:35, 2613:39, 2622:15, 2642:15	Form [4] - 2643:3, 2651:16, 2652:37, 2682:27	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	fill [1] - 2654:10	flippancy [1] - 2625:1	form [117] - 2612:30, 2614:8, 2614:16, 2618:41, 2628:21, 2628:29, 2628:42, 2630:4, 2630:13, 2630:19, 2630:20, 2641:35, 2641:41, 2642:22, 2642:37, 2643:39, 2644:6, 2644:11, 2644:13, 2644:15, 2644:28, 2644:40, 2645:32, 2646:28, 2646:31, 2646:41, 2647:4, 2647:8, 2651:16, 2651:46, 2652:23, 2652:24, 2654:7, 2654:21, 2655:26, 2655:28, 2655:33, 2656:15, 2656:38, 2657:1, 2657:5, 2657:13, 2657:22, 2657:44, 2658:33, 2659:28, 2659:41,	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	filled [7] - 2651:5, 2651:24, 2652:20, 2653:1, 2656:38, 2656:43, 2669:9	focus [2] - 2664:40, 2668:4	forms [14] - 2628:24, 2629:14, 2630:13, 2650:47, 2651:39, 2653:12, 2653:21, 2654:3, 2654:10, 2677:18, 2678:2, 2678:10, 2696:44, 2697:20	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	filling [3] - 2654:21, 2664:6, 2669:23	fog [2] - 2663:23, 2663:25	formulates [1] - 2625:38	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	final [3] - 2607:35, 2615:3, 2715:28	folder [5] - 2624:37, 2666:43, 2666:45, 2689:22	forth [1] - 2716:20	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	financial [1] - 2623:6	folders [3] - 2626:28, 2651:1, 2651:2	fortunate [1] - 2623:35	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	find [1] - 2608:5	follow [5] - 2621:42, 2663:44, 2665:16, 2693:8, 2712:13	forums [1] - 2608:30	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	fine [5] - 2626:13, 2652:16, 2652:30, 2705:32, 2717:44	following [9] - 2622:24, 2653:16, 2662:41, 2662:47, 2664:6, 2671:25, 2685:11, 2708:44, 2712:3	forward [6] - 2613:31, 2648:19, 2687:39, 2687:45, 2687:46, 2711:26	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16, 2680:2, 2680:44, 2681:20, 2682:32, 2683:38, 2684:6, 2684:27, 2684:36, 2684:47, 2686:37, 2687:15, 2688:30, 2688:32, 2688:37, 2688:47, 2691:2, 2691:5, 2691:12, 2693:30, 2695:35, 2696:1, 2696:9, 2696:30, 2696:45
faithful [1] - 2624:7	finish [5] - 2616:29, 2622:38, 2699:32, 2705:20, 2715:23	follows [2] - 2641:46,	foundation [1] - 2615:24	2666:18, 2666:20, 2667:6, 2667:14, 2667:27, 2667:45, 2669:42, 2670:4, 2671:21, 2671:24, 2671:29, 2671:37, 2671:41, 2671:43, 2672:17, 2675:10, 2675:31, 2676:8, 2679:2, 2679:3, 2679:16

2658:3, 2689:28,
2689:30, 2696:39,
2705:44, 2710:28,
2711:17, 2711:18,
2711:23
fourth [2] - 2649:10,
2689:46
frankly [3] - 2643:32,
2644:21, 2645:46
fraught [3] - 2682:20,
2684:21, 2706:25
freak [1] - 2617:22
frequently [1] -
2636:42
FRIDAY [1] - 2718:13
friend [3] - 2617:30,
2717:22, 2717:27
front [6] - 2651:7,
2653:46, 2657:27,
2660:12, 2680:26,
2682:44
full [6] - 2616:12,
2616:42, 2633:2,
2634:31, 2641:30,
2643:17
fully [1] - 2634:24
fulsome [1] - 2618:34
function [1] - 2711:35
fund [2] - 2627:42,
2628:1
funds [1] - 2655:3
funny [2] - 2617:7,
2619:40

G

Gail [2] - 2641:2,
2641:4
gang [1] - 2666:9
gangs [2] - 2636:38,
2636:41
gather [2] - 2620:45,
2632:7
Gay [1] - 2609:33
gay [7] - 2607:19,
2607:21, 2607:47,
2608:28, 2608:45,
2609:12, 2609:18,
2609:27, 2609:29,
2609:34, 2609:35,
2610:45, 2611:5,
2611:12, 2611:42,
2618:10, 2618:15,
2627:22, 2631:28,
2631:45, 2635:1,
2635:8, 2635:16,
2635:23, 2635:24,
2635:30, 2635:39,
2635:40, 2635:41,
2635:42, 2637:33,

2639:36, 2639:39,
2639:43, 2639:45,
2640:2, 2640:8,
2640:27, 2673:19,
2681:31, 2689:29,
2690:9, 2703:13,
2703:25, 2703:33,
2703:34, 2703:35,
2703:40, 2704:16,
2705:38, 2705:47,
2706:6, 2706:23,
2706:31, 2706:46,
2707:3, 2707:34,
2707:35, 2707:38,
2707:40, 2707:47,
2708:14, 2708:20,
2712:2, 2712:20,
2712:39, 2713:7,
2715:20
gays [1] - 2640:37
Gee [1] - 2616:23
gee [2] - 2640:12,
2640:31
general [4] - 2630:20,
2633:39, 2666:27,
2682:34
generally [6] -
2630:15, 2630:21,
2631:10, 2679:17,
2684:28, 2705:18
generate [1] - 2678:27
generated [1] -
2662:20
generation [1] -
2716:15
generic [1] - 2635:24
genesis [2] - 2662:25,
2716:9
gentle [1] - 2619:17
genuine [4] - 2607:47,
2619:31, 2620:25,
2620:26
Geoffrey [1] - 2677:6
gesture [2] - 2691:44,
2692:17
gestures [9] -
2657:31, 2667:32,
2691:15, 2693:31,
2695:42, 2696:6,
2696:15, 2696:22,
2696:37
get-go [2] - 2669:21,
2674:30
gild [1] - 2619:9
Gillies [3] - 2637:30,
2637:32, 2710:1
given [16] - 2617:14,
2627:26, 2627:27,
2642:14, 2643:19,
2646:3, 2666:17,

2674:33, 2675:26,
2679:47, 2680:13,
2688:3, 2699:41,
2699:47, 2700:8,
2711:34
GLBTIQ [2] - 2635:6,
2635:9
gleaned [2] - 2615:45,
2615:47
God [4] - 2621:35,
2624:42, 2637:35,
2640:31
Google [2] - 2630:33,
2630:34
grab [1] - 2617:40
Grace [1] - 2619:17
graffiti [1] - 2657:35
grandiose [1] - 2609:5
graph [1] - 2689:24
gravity [1] - 2627:33
GRAY [43] - 2612:40,
2628:37, 2642:8,
2642:27, 2645:35,
2648:1, 2648:16,
2648:24, 2648:26,
2652:29, 2655:7,
2663:42, 2664:44,
2666:23, 2666:34,
2667:1, 2667:26,
2668:22, 2673:47,
2679:12, 2682:8,
2682:38, 2683:36,
2686:46, 2688:24,
2692:2, 2693:39,
2694:8, 2695:10,
2696:26, 2697:18,
2699:32, 2700:19,
2700:27, 2701:13,
2704:27, 2705:18,
2705:36, 2709:42,
2711:11, 2714:35,
2717:13, 2717:32
Gray [19] - 2606:30,
2612:34, 2612:37,
2613:28, 2628:42,
2648:14, 2651:47,
2663:25, 2664:42,
2666:20, 2667:21,
2668:20, 2682:6,
2683:33, 2686:44,
2693:30, 2694:46,
2696:18, 2705:15
great [3] - 2655:20,
2661:6, 2687:26
greater [2] - 2640:30,
2672:38
Green [1] - 2640:24
gross [1] - 2661:4
grossly [3] - 2621:46,
2622:30, 2634:32

ground [1] - 2649:36
group [3] - 2642:4,
2690:34, 2690:37
grouping [2] -
2669:11, 2669:12
groups [2] - 2642:3,
2667:37
Gruenewald [1] -
2632:28
guess [20] - 2613:40,
2614:5, 2615:31,
2616:7, 2617:35,
2618:9, 2618:14,
2618:26, 2623:6,
2623:28, 2626:22,
2629:32, 2632:13,
2632:15, 2636:36,
2636:39, 2637:6,
2649:2, 2654:9,
2711:32
guy [1] - 2621:25

H

half [9] - 2619:41,
2646:17, 2647:17,
2660:32, 2687:5,
2705:31, 2705:32,
2717:42, 2717:44
halfway [1] - 2660:17
Halsey [1] - 2623:21
halt [1] - 2623:24
hand [3] - 2613:8,
2662:34, 2662:37
handed [1] - 2610:41
handled [1] - 2621:10
hang [2] - 2685:28,
2697:9
happy [6] - 2612:43,
2623:1, 2641:27,
2648:1, 2683:27
happy [1] - 2683:29
hard [11] - 2611:7,
2613:8, 2613:15,
2614:3, 2618:13,
2618:33, 2621:18,
2624:17, 2629:26,
2636:35, 2702:32
hard [1] - 2618:43
harder [1] - 2615:35
hardly [3] - 2644:22,
2662:14, 2691:22
harm [6] - 2690:37,
2699:20, 2701:29,
2701:32, 2702:39,
2704:18
harsh [1] - 2609:14
hate [27] - 2606:11,
2607:21, 2607:47,
2627:22, 2631:28,

2631:45, 2635:1,
2635:8, 2635:16,
2635:23, 2635:24,
2635:30, 2635:39,
2637:40, 2639:36,
2639:39, 2639:43,
2639:45, 2640:2,
2640:8, 2661:8,
2667:37, 2673:19,
2681:31, 2704:16,
2704:33
hatred [1] - 2624:31
head [1] - 2716:44
heading [11] -
2648:41, 2656:22,
2658:3, 2660:17,
2682:11, 2685:47,
2686:47, 2687:37,
2688:25, 2702:22,
2713:12
Healey [1] - 2606:33
Healey-Nash [1] -
2606:33
hear [6] - 2609:45,
2625:21, 2646:9,
2688:19, 2700:13,
2714:26
heard [3] - 2644:20,
2644:36, 2648:6
hearing [3] - 2613:21,
2694:17, 2717:29
Heath [1] - 2618:36
heavy [1] - 2610:41
hedging [1] - 2670:26
help [10] - 2618:39,
2622:16, 2629:28,
2640:31, 2641:14,
2643:29, 2666:26,
2666:40, 2668:6
helpful [5] - 2621:24,
2626:26, 2637:17,
2637:18, 2700:8
helpfully [1] - 2661:3
helpfulness [1] -
2711:8
helping [2] - 2665:22,
2665:24
helps [1] - 2680:25
hesitant [1] - 2664:21
hesitate [1] - 2687:35
hesitation [1] -
2645:35
heterosexual [2] -
2635:12, 2640:24
heterosexuality [1] -
2611:3
high [3] - 2618:20,
2638:45, 2658:28
high-water [1] -
2638:45

- Hills** [1] - 2620:39
himself [2] - 2612:35, 2648:8
hint [1] - 2700:8
historic [2] - 2653:17, 2653:24
historical [2] - 2608:42, 2677:45
historically [1] - 2685:1
histories [1] - 2608:34
history [5] - 2607:26, 2608:26, 2713:1, 2713:2
hit [1] - 2630:36
hits [1] - 2618:41
hmm [26] - 2608:13, 2608:19, 2609:24, 2611:13, 2612:21, 2614:34, 2621:31, 2627:15, 2628:22, 2629:20, 2630:42, 2632:30, 2636:2, 2636:12, 2639:40, 2641:24, 2641:42, 2646:35, 2665:15, 2669:40, 2674:43, 2675:24, 2675:28, 2692:12, 2697:46, 2698:4
hold [1] - 2607:19
holdings [4] - 2653:17, 2653:24, 2653:34, 2653:39
Holocaust [3] - 2624:34, 2624:35, 2630:26
homicide [6] - 2617:45, 2624:26, 2626:27, 2679:38, 2704:38
homicides [7] - 2607:28, 2627:13, 2627:22, 2632:19, 2632:25, 2661:6
homosexual [4] - 2608:47, 2637:41, 2640:14, 2640:18
homosexuality [1] - 2640:30
homosexuals [1] - 2706:45
honest [6] - 2610:46, 2617:33, 2618:9, 2618:11, 2618:17, 2633:47
honestly [3] - 2626:11, 2639:27, 2644:41
honour [1] - 2624:35
- Honourable** [1] - 2606:16
hope [2] - 2641:3, 2668:10
hopefully [3] - 2626:10, 2626:25, 2666:45
horrendous [1] - 2624:27
horrific [5] - 2624:27, 2624:41, 2626:31, 2641:7, 2641:11
horrified [1] - 2610:13
hostility [2] - 2618:16, 2637:40
hour [5] - 2622:21, 2705:31, 2705:32, 2717:42, 2717:44
hours [1] - 2610:36
house [2] - 2621:8, 2621:9
human [4] - 2638:40, 2641:10, 2641:13, 2641:16
humanly [1] - 2623:10
humble [1] - 2627:3
hundred [1] - 2651:28
hundreds [1] - 2652:8
hunting [1] - 2638:44
hurtful [3] - 2610:20, 2610:23, 2610:24
-
- I**
-
- idea** [14] - 2608:23, 2616:11, 2616:40, 2617:5, 2617:7, 2617:13, 2621:8, 2635:19, 2636:37, 2637:9, 2696:3, 2710:44, 2714:38, 2715:3
identically [1] - 2613:46
identification [1] - 2690:40
identified [9] - 2614:20, 2636:17, 2641:8, 2646:22, 2646:25, 2660:33, 2660:39, 2664:2, 2693:32
identifies [2] - 2635:15, 2673:23
identify [5] - 2635:38, 2639:11, 2660:38, 2666:15, 2691:12
identifying [2] - 2663:28, 2673:19
identity [5] - 2637:37, 2715:41, 2716:43, 2717:2, 2717:3
ignorant [1] - 2619:11
imagination [1] - 2623:40
imagine [3] - 2614:3, 2614:4, 2624:29
immediately [8] - 2616:14, 2616:47, 2617:25, 2617:44, 2619:2, 2657:44, 2684:16, 2692:28
impact [1] - 2712:3
impart [1] - 2674:32
imparts [2] - 2674:24, 2675:36
imperfect [1] - 2625:3
implement [1] - 2676:4
implicit [3] - 2610:15, 2699:16, 2699:18
implied [1] - 2642:21
importance [3] - 2608:21, 2627:33, 2636:4
important [9] - 2615:30, 2615:31, 2615:32, 2619:12, 2619:22, 2638:33, 2640:7, 2667:39, 2680:4
impossible [2] - 2669:25, 2698:11
impression [2] - 2676:14, 2678:16
improves [1] - 2643:35
in-house [2] - 2621:8, 2621:9
inaccuracies [1] - 2632:15
inaccurate [3] - 2644:44, 2645:6, 2645:12
inadequacies [1] - 2646:25
inadequacy [1] - 2680:33
inadequate [5] - 2614:8, 2645:17, 2645:19, 2645:33, 2646:34
incestuous [1] - 2637:34
incidence [1] - 2672:47
incident [1] - 2658:22
inclination [1] - 2630:37
include [9] - 2609:22, 2635:1, 2635:29, 2683:43, 2698:36, 2698:45, 2699:14, 2702:11, 2704:9
included [4] - 2611:11, 2651:10, 2699:20, 2699:26
includes [5] - 2673:27, 2684:6, 2684:10, 2700:40, 2705:37
including [5] - 2612:7, 2639:44, 2649:37, 2671:24, 2684:36
inclusion [3] - 2629:24, 2629:44, 2642:3
incorrectly [1] - 2687:14
incredibly [1] - 2621:2
indeed [8] - 2607:21, 2613:33, 2630:37, 2636:28, 2643:15, 2663:11, 2713:4, 2715:28
indented [1] - 2709:44
independence [4] - 2608:17, 2608:18, 2608:23, 2608:35
independent [6] - 2608:31, 2663:29, 2674:13, 2675:5, 2675:11, 2675:32
indeterminate [1] - 2607:40
indication [2] - 2680:24, 2690:21
indicator [6] - 2642:21, 2657:46, 2658:42, 2660:2, 2660:3, 2671:38
Indicator [3] - 2643:3, 2649:38, 2650:10
Indicators [3] - 2651:16, 2652:37, 2682:27
indicators [54] - 2657:2, 2657:6, 2657:9, 2657:14, 2657:26, 2657:38, 2657:45, 2658:3, 2658:33, 2658:38, 2658:47, 2659:12, 2659:47, 2660:28, 2661:32, 2661:47, 2662:17, 2662:22, 2662:23, 2662:34, 2662:38, 2663:4, 2663:11, 2663:15, 2663:28, 2663:29, 2668:35, 2669:11, 2669:12, 2669:13, 2672:10, 2676:28, 2676:34, 2680:32, 2680:33, 2680:40, 2680:46, 2681:17, 2681:28, 2681:32, 2681:33, 2681:40, 2681:44, 2681:47, 2683:43, 2684:7, 2684:10, 2685:6, 2685:7, 2687:1, 2687:47, 2688:13
indifference [1] - 2705:24
individual [11] - 2619:34, 2639:32, 2639:33, 2677:31, 2677:45, 2678:1, 2679:37, 2685:26, 2700:41, 2703:38, 2704:19
individuals [1] - 2654:11
inducement [2] - 2608:9, 2619:28
indulge [1] - 2637:9
inevitably [1] - 2692:2
infamous [1] - 2620:42
infinitely [1] - 2623:10
inflated [1] - 2622:30
Information [5] - 2658:9, 2689:30, 2689:42, 2689:47, 2706:15
information [12] - 2607:23, 2624:45, 2655:37, 2663:10, 2665:43, 2668:37, 2669:23, 2698:22, 2698:23, 2714:5, 2714:8, 2714:10
Information' [1] - 2620:21
initial [3] - 2618:26, 2620:36, 2678:35
innocuous [3] - 2715:40, 2716:4, 2716:5
input [1] - 2655:15
inquiry [1] - 2607:37
INQUIRY [1] - 2718:12
Inquiry [4] - 2606:9, 2621:27, 2636:1, 2660:9
inserted [2] - 2629:1, 2651:40
insight [2] - 2615:45, 2615:47

- insist** [1] - 2694:44
insofar [6] - 2640:11, 2673:40, 2675:46, 2676:1, 2676:14, 2677:30
instance [4] - 2664:19, 2666:9, 2688:35, 2703:12
instances [1] - 2678:7
instead [7] - 2629:18, 2643:6, 2643:40, 2646:37, 2647:15, 2677:1, 2717:7
instilled [1] - 2608:3
instinct [1] - 2694:42
institutions [1] - 2609:9
instruction [1] - 2679:4
instructions [1] - 2679:3
instrument [43] - 2613:41, 2614:28, 2615:6, 2615:8, 2625:4, 2631:2, 2631:6, 2631:19, 2632:12, 2642:5, 2647:8, 2655:28, 2659:26, 2661:22, 2661:28, 2661:32, 2661:40, 2661:42, 2662:1, 2662:14, 2662:37, 2663:20, 2663:34, 2663:35, 2663:37, 2663:42, 2663:44, 2664:28, 2664:31, 2665:12, 2665:36, 2666:2, 2668:45, 2672:45, 2674:29, 2674:30, 2675:39, 2675:41, 2675:43, 2676:31, 2676:42
instruments [3] - 2629:34, 2631:14, 2631:21
Insufficient [6] - 2658:9, 2689:30, 2689:42, 2689:47, 2690:15, 2706:15
intended [1] - 2704:18
intends [1] - 2703:13
intent [1] - 2686:46
intention [3] - 2702:15, 2704:40
intentionality [8] - 2643:8, 2699:19, 2700:34, 2701:5, 2701:32, 2701:41, 2701:42, 2703:2
intentionality" [1] - 2700:29
intentionally [3] - 2690:35, 2701:29, 2702:39
interaction [2] - 2638:41, 2704:38
interactions [1] - 2618:30
interested [4] - 2665:39, 2665:41, 2667:22, 2673:39
interesting [5] - 2626:22, 2627:30, 2631:13, 2635:20, 2640:29
interestingly [1] - 2622:10
interests [4] - 2611:41, 2612:9, 2630:25, 2630:29
intermediate [1] - 2690:18
interpolate [1] - 2672:33
interpretation [4] - 2631:17, 2661:7, 2687:26, 2688:32
interrogating [2] - 2631:45, 2676:10
interrogatory [1] - 2677:36
interrupt [3] - 2627:7, 2631:31, 2645:35
interrupted [1] - 2616:36
interrupting [1] - 2612:33
intimately [2] - 2608:27, 2619:42
intimidated [1] - 2618:29
intimidating [1] - 2620:18
invent [2] - 2631:14, 2681:1
invented [2] - 2680:32, 2681:44
invention [1] - 2716:47
investigation [4] - 2678:36, 2688:41, 2689:6, 2689:10
investigative [1] - 2616:5
investigator [3] - 2616:8, 2670:5, 2679:5
investigators [1] - 2657:1
invited [3] - 2633:18, 2671:15, 2700:46
inviting [3] - 2694:46, 2694:47
involve [1] - 2691:5
involved [6] - 2619:42, 2623:8, 2636:42, 2687:25, 2704:37, 2707:8
involvement [3] - 2650:34, 2667:5, 2686:20
iota [1] - 2620:4
irrelevant [3] - 2611:1, 2680:2, 2680:3
irrespective [2] - 2631:19, 2647:6
irritating [1] - 2680:4
issue [3] - 2614:37, 2678:8, 2706:26
issued [1] - 2614:37
it" [4] - 2618:44, 2634:34, 2644:29, 2697:10
item [5] - 2665:30, 2665:31, 2665:34, 2677:3, 2697:15
itself [6] - 2643:30, 2651:16, 2651:46, 2655:26, 2655:45, 2667:27
-
- J**
-
- Jacqueline** [1] - 2620:35
jarred [1] - 2610:39
job [9] - 2614:38, 2621:29, 2621:38, 2621:44, 2623:9, 2623:10, 2626:33, 2654:11, 2681:1
John [2] - 2606:16, 2698:20
Johnson [1] - 2624:43
joke [1] - 2622:25
jokes [1] - 2609:30
journal [1] - 2641:45
judgment [2] - 2640:24, 2677:15
judgments [1] - 2673:25
July [1] - 2625:28
June [2] - 2628:43, 2629:1
junior [1] - 2638:6
jurisdiction [3] - 2608:32, 2616:25, 2616:38
Justice [1] - 2606:16
-
- justice** [1] - 2609:9
juxtapose [1] - 2643:26
-
- K**
-
- KC** [1] - 2606:37
keep [3] - 2617:39, 2631:4, 2691:40
kept [1] - 2631:2
key [1] - 2679:1
kids [1] - 2641:12
killed [2] - 2691:22, 2691:24
killer [2] - 2715:6, 2715:13
kind [33] - 2607:1, 2607:27, 2608:7, 2608:27, 2608:33, 2609:4, 2610:39, 2611:7, 2614:3, 2614:27, 2615:14, 2616:17, 2618:29, 2618:44, 2619:4, 2619:17, 2619:30, 2620:46, 2621:7, 2623:23, 2626:39, 2626:43, 2627:2, 2628:10, 2632:7, 2640:23, 2664:19, 2665:47, 2668:16, 2668:30, 2679:26, 2699:19, 2716:30
kinds [1] - 2645:16
knowing [2] - 2630:4, 2714:37
knowledge [5] - 2615:24, 2629:6, 2629:7, 2631:7, 2661:46
known [9] - 2609:28, 2611:6, 2618:2, 2635:3, 2635:4, 2635:6, 2698:7, 2712:2
-
- L**
-
- lack** [2] - 2629:6, 2666:10
laid [1] - 2676:42
language [1] - 2615:16
laptop [2] - 2628:16, 2628:17
large [5] - 2627:14, 2648:35, 2648:37, 2649:42, 2649:43
largely [2] - 2611:41, 2671:7
last [2] - 2625:22, 2699:30
late [2] - 2638:40, 2716:2
latent [1] - 2637:41
latter [4] - 2646:17, 2663:20, 2663:34, 2663:37
law [1] - 2637:28
lawyers [1] - 2622:33
lead [2] - 2632:15, 2689:10
learn [2] - 2615:40, 2615:43
learned [3] - 2617:30, 2717:22, 2717:27
learning [1] - 2615:20
least [7] - 2619:30, 2639:1, 2660:33, 2664:12, 2678:40, 2703:20, 2705:41
leave [5] - 2647:43, 2648:7, 2664:31, 2664:36, 2703:6
leaves [1] - 2661:6
leaving [2] - 2630:30, 2690:18
lecturer [3] - 2626:45, 2626:46
lectures [2] - 2623:31, 2641:15
left [3] - 2610:16, 2613:46, 2707:14
legal [1] - 2609:3
Legal [1] - 2606:32
length [1] - 2672:38
Lesbian [1] - 2609:33
lesbian [3] - 2609:34, 2609:36, 2609:37
less [9] - 2609:35, 2615:30, 2616:21, 2624:41, 2632:11, 2659:36, 2677:34
lethal [2] - 2639:30, 2640:34
letter [3] - 2625:27, 2625:28, 2626:2
level [6] - 2607:20, 2618:20, 2618:21, 2618:41, 2632:11, 2666:27
Level [2] - 2606:20, 2684:13
lever [1] - 2652:7
Levin [2] - 2662:18, 2664:15
LGBTIQ [8] - 2606:11, 2608:40, 2609:23, 2612:10, 2632:40, 2635:2, 2635:17,

- 2635:31
Liaison [1] - 2609:33
life [4] - 2609:40, 2618:11, 2625:4, 2630:31
light [3] - 2615:29, 2626:25, 2665:12
likely [3] - 2637:2, 2637:4, 2678:30
lily [1] - 2619:9
limited [1] - 2650:34
line [6] - 2609:40, 2617:31, 2617:32, 2625:1, 2687:8, 2690:47
lines [5] - 2651:33, 2651:36, 2656:26, 2656:31, 2667:7
linked [1] - 2690:39
Lint [25] - 2607:11, 2613:29, 2615:27, 2625:30, 2625:39, 2629:17, 2632:1, 2641:22, 2643:20, 2646:47, 2648:5, 2648:8, 2648:17, 2648:26, 2651:46, 2652:33, 2655:43, 2666:40, 2668:16, 2668:22, 2670:11, 2683:15, 2717:28, 2717:45
LINT [1] - 2648:22
list [4] - 2623:32, 2662:22, 2662:23, 2703:20
listen [1] - 2718:3
listened [1] - 2615:10
listening [1] - 2643:19
literature [5] - 2623:14, 2680:46, 2681:17, 2681:19, 2716:16
litigation [1] - 2646:7
live [1] - 2639:2
living [1] - 2638:39
loaded [1] - 2646:4
location [1] - 2650:3
lofty [1] - 2619:8
logic [7] - 2608:4, 2608:24, 2615:16, 2620:23, 2635:13, 2669:23, 2669:27
logically [1] - 2668:38
look [23] - 2609:29, 2612:26, 2617:9, 2617:15, 2620:12, 2624:9, 2641:27, 2648:30, 2650:44, 2657:17, 2667:45, 2668:5, 2668:7, 2668:11, 2681:29, 2686:29, 2699:47, 2701:25, 2706:35, 2708:24, 2709:42, 2714:7, 2715:5
looked [9] - 2627:18, 2627:21, 2653:40, 2654:19, 2664:15, 2676:7, 2716:10
looking [18] - 2627:13, 2629:33, 2631:27, 2638:44, 2643:13, 2649:32, 2654:31, 2657:18, 2673:43, 2676:42, 2677:3, 2679:14, 2701:13, 2706:31, 2710:46, 2713:10
looks [2] - 2666:11, 2706:33
loosely [1] - 2636:41
losing [1] - 2711:9
lost [2] - 2679:45, 2705:20
Lovegrove [12] - 2630:41, 2660:39, 2660:47, 2661:13, 2664:20, 2670:14, 2670:24, 2670:41, 2672:1, 2675:42, 2677:2, 2687:16
Lovegrove's [3] - 2661:17, 2664:35, 2671:3
low [3] - 2672:35, 2692:3, 2706:35
lower [2] - 2632:11, 2703:9
lower-level [1] - 2632:11
lunch [1] - 2668:22
luncheon [2] - 2667:44, 2667:45
-
- M**
-
- Macquarie** [1] - 2606:20
mad [1] - 2628:5
magic [2] - 2622:9, 2631:5
magnificent [1] - 2634:20
main [1] - 2704:3
make-up [1] - 2618:29
maligned [1] - 2621:17
man [15] - 2608:47, 2609:27, 2609:35, 2618:10, 2619:17, 2621:2, 2631:36, 2635:40, 2635:41, 2637:33, 2637:37, 2640:25, 2640:27, 2640:31, 2714:1
man's [1] - 2637:19
manner [1] - 2716:10
March [1] - 2606:25
MARCH [1] - 2718:13
mark [1] - 2638:45
Mark [2] - 2606:37, 2623:21
marking [1] - 2623:31
markings [2] - 2657:34, 2667:36
Marmo [2] - 2641:14, 2641:15
Martha [3] - 2687:38, 2688:28, 2688:30
Mary [1] - 2618:36
Mason [2] - 2642:2, 2713:18
Mason's [1] - 2641:2
Massachusetts [4] - 2683:40, 2683:44, 2683:47, 2684:10
masturbating [1] - 2608:46
matched [1] - 2613:46
matches [1] - 2673:30
material [19] - 2616:13, 2616:41, 2616:42, 2616:43, 2617:18, 2617:20, 2627:33, 2644:28, 2653:28, 2654:5, 2654:6, 2655:37, 2665:15, 2669:27, 2677:19, 2677:45, 2680:17, 2684:47, 2708:7
materials [10] - 2649:12, 2649:21, 2649:29, 2649:33, 2649:47, 2652:22, 2654:14, 2654:19, 2655:8, 2669:26
matrix [1] - 2699:38
matter [6] - 2630:38, 2633:37, 2645:43, 2652:11, 2694:16, 2705:24
matters [4] - 2620:1, 2636:38, 2674:33, 2704:9
McDevitt [3] - 2662:18, 2664:16
McLaughlin [1] - 2662:20
mean [32] - 2614:2, 2616:7, 2619:40, 2620:4, 2637:30, 2639:1, 2640:36, 2644:14, 2654:43, 2656:34, 2660:1, 2666:7, 2667:26, 2669:15, 2669:33, 2675:15, 2679:12, 2683:1, 2684:9, 2684:35, 2685:19, 2685:29, 2685:36, 2693:20, 2697:19, 2698:40, 2702:14, 2702:15, 2703:30, 2710:42, 2714:8
meaning [1] - 2654:44
meaningful [10] - 2666:1, 2666:2, 2666:6, 2666:14, 2666:19, 2666:29, 2667:24, 2667:28, 2668:1
means [13] - 2613:15, 2638:8, 2644:19, 2659:31, 2659:36, 2666:25, 2667:44, 2668:4, 2673:24, 2685:17, 2695:32, 2717:46, 2718:1
meant [4] - 2622:33, 2623:30, 2623:32, 2685:24
medical [4] - 2622:33, 2631:15, 2631:16, 2631:18
medium [1] - 2633:45
meet [1] - 2675:43
meeting [2] - 2615:3, 2692:3
meetings [6] - 2618:6, 2618:26, 2618:38, 2650:2, 2650:3, 2650:13
Meg [1] - 2606:31
member [5] - 2610:44, 2632:40, 2635:17, 2635:31, 2635:32
members [3] - 2609:22, 2635:2, 2666:9
memoire [1] - 2677:6
memory [6] - 2614:46, 2615:2, 2637:34, 2637:43, 2638:12, 2712:46
men [4] - 2608:45, 2609:12, 2637:29, 2704:36
mental [2] - 2663:23, 2707:44
mention [2] - 2671:37, 2715:14
mentioned [5] - 2617:21, 2617:29, 2627:32, 2683:42, 2715:7
mere [3] - 2642:20, 2644:11, 2714:18
merely [3] - 2632:39, 2678:10, 2711:33
merit [1] - 2642:3
merry [1] - 2614:29
mess [1] - 2713:17
message [3] - 2667:29, 2696:46, 2696:47
messaging [3] - 2667:30, 2667:34, 2667:37
messy [1] - 2608:33
met [2] - 2624:25, 2677:16
method [4] - 2677:5, 2687:25, 2712:4, 2712:13
methodology [6] - 2642:15, 2664:12, 2664:47, 2665:1, 2671:24, 2689:21
middle [3] - 2625:28, 2658:46, 2659:8
Middleton [2] - 2620:16, 2620:17
midway [1] - 2642:46
might [48] - 2610:13, 2610:14, 2611:6, 2615:29, 2617:14, 2626:26, 2627:10, 2629:35, 2629:47, 2631:1, 2633:30, 2634:32, 2635:10, 2637:10, 2637:29, 2637:41, 2642:38, 2643:15, 2668:8, 2668:10, 2668:11, 2673:42, 2677:46, 2678:22, 2679:18, 2687:35, 2695:24, 2695:25, 2695:41, 2696:4, 2701:21, 2703:26, 2703:33, 2707:12, 2707:23, 2709:15, 2711:12, 2712:46, 2713:3, 2714:12, 2714:37, 2716:2, 2717:6, 2717:22, 2717:29
mind [14] - 2618:23, 2626:37, 2654:45,

- 2665:47, 2669:38,
2699:16, 2699:46,
2704:46, 2705:11,
2707:44, 2708:3,
2708:10, 2710:11
mindedness [1] -
2608:35
minds [1] - 2685:14
minefield [1] -
2635:21
minute [3] - 2683:10,
2685:28, 2697:9
minutes [5] - 2667:23,
2667:47, 2693:43,
2694:12, 2705:21
mirror [1] - 2639:3
misconceived [3] -
2664:13, 2664:14,
2688:11
misconception [1] -
2707:5
misheard [2] - 2612:4,
2625:22
misleading [4] -
2641:39, 2643:16,
2643:28, 2644:39
misquote [2] -
2681:10, 2681:13
missed [1] - 2618:22
missing [2] - 2672:11,
2716:31
mistake [1] - 2688:19
misunderstanding [1]
- 2632:45
misunderstood [1] -
2664:11
mitigate [1] - 2695:25
mitigated [2] -
2640:27, 2690:38
mixed [4] - 2704:9,
2704:13, 2704:29,
2705:8
mixture [1] - 2704:33
mmm-hmm [26] -
2608:13, 2608:19,
2609:24, 2611:13,
2612:21, 2614:34,
2621:31, 2627:15,
2628:22, 2629:20,
2630:42, 2632:30,
2636:2, 2636:12,
2639:40, 2641:24,
2641:42, 2646:35,
2665:15, 2669:40,
2674:43, 2675:24,
2675:28, 2692:12,
2697:46, 2698:4
model [2] - 2611:4,
2688:40
modern [1] - 2640:39
moment [17] -
2618:20, 2627:10,
2630:30, 2631:32,
2636:21, 2642:25,
2664:40, 2666:43,
2670:12, 2671:47,
2673:42, 2685:42,
2693:9, 2693:22,
2693:25, 2693:29,
2700:9
moments [1] -
2625:21
money [7] - 2623:22,
2624:6, 2624:10,
2624:11, 2627:41,
2628:11, 2704:41
month [2] - 2639:20,
2660:9
months [4] - 2618:40,
2639:21, 2670:46,
2715:29
morning [6] - 2648:5,
2671:38, 2678:2,
2688:3, 2717:16,
2717:28
most [10] - 2609:39,
2620:11, 2620:38,
2628:4, 2631:10,
2640:36, 2648:5,
2659:35, 2678:30
motivate [1] - 2635:7
motivated [5] -
2658:23, 2698:29,
2702:8, 2702:26,
2702:28
motivation [4] -
2702:12, 2702:32,
2702:35, 2703:7
motive [7] - 2660:2,
2666:9, 2666:10,
2666:12, 2704:3,
2706:46
motives [3] - 2704:10,
2704:13, 2705:8
mouth [2] - 2622:4,
2637:19
move [4] - 2689:21,
2696:30, 2711:26,
2712:17
moved [2] - 2617:10,
2712:40
multitudinous [1] -
2665:35
murder [5] - 2616:12,
2616:13, 2616:42,
2617:44, 2712:47
murdered [2] -
2640:25, 2640:46
murky [1] - 2608:34
must [7] - 2620:43,
2624:8, 2627:12,
2649:24, 2695:3,
2711:15, 2713:20
mutual [1] - 2668:38
Mykkeltvedt [1] -
2606:37
-
- N**
-
- naive** [2] - 2626:27,
2627:11
name [1] - 2620:13
namely [5] - 2658:7,
2664:35, 2667:46,
2674:12, 2675:4
names [1] - 2709:3
Narmon [2] - 2622:12,
2622:15
narrative [14] -
2677:24, 2677:36,
2677:44, 2678:4,
2678:11, 2678:12,
2678:13, 2678:22,
2678:32, 2678:37,
2679:8, 2680:9,
2680:10, 2681:21
narratives [2] -
2629:32, 2681:22
narrower [1] - 2668:40
Nash [1] - 2606:33
nasty [1] - 2608:33
nature [3] - 2646:4,
2653:23, 2687:14
Nazi [2] - 2611:45,
2612:8
NBC [1] - 2709:8
necessarily [6] -
2624:25, 2671:12,
2674:34, 2703:10,
2707:34, 2717:11
necessary [2] -
2668:32, 2684:40
neck [1] - 2681:36
need [17] - 2637:38,
2675:39, 2678:41,
2680:6, 2680:47,
2685:16, 2687:6,
2687:35, 2689:21,
2689:22, 2695:20,
2696:40, 2698:28,
2708:43, 2711:31,
2715:25, 2716:35
needed [13] - 2644:7,
2645:4, 2650:30,
2653:39, 2665:2,
2665:44, 2665:47,
2666:14, 2671:32,
2681:23, 2716:4,
2716:20, 2716:39
needing [1] - 2671:45
needs [3] - 2694:45,
2695:22, 2695:24
negative [1] - 2618:30
neglect [1] - 2641:12
neglected [3] -
2609:42, 2610:4,
2610:6
nervous [1] - 2618:17
nervousness [1] -
2618:17
ness [1] - 2700:41
never [16] - 2607:33,
2616:7, 2620:22,
2622:25, 2624:31,
2627:17, 2627:18,
2627:21, 2629:45,
2630:3, 2638:9,
2638:25, 2653:33,
2654:24, 2661:45,
2706:26
nevertheless [3] -
2624:26, 2679:4,
2705:8
New [4] - 2606:21,
2608:25, 2658:43,
2684:6
new [2] - 2628:10,
2630:31
Newcastle [1] -
2714:2
next [13] - 2648:2,
2648:16, 2659:32,
2659:33, 2661:16,
2684:16, 2688:26,
2689:3, 2690:45,
2695:31, 2701:26,
2711:44, 2712:31
nice [4] - 2616:16,
2619:18, 2620:46,
2641:4
nicer [1] - 2629:35
Nicole [1] - 2609:41
night [1] - 2638:40
nine [4] - 2661:47,
2683:43, 2684:10,
2685:7
nitpicking [1] -
2662:27
no-one [2] - 2622:29,
2644:30
noise [2] - 2609:46,
2618:20
nomenclature [1] -
2627:46
nominate [1] -
2700:46
nominated [2] -
2700:46, 2713:38
nominates [1] -
2709:3
non [6] - 2661:6,
2682:21, 2690:40,
2694:15, 2694:17,
2694:21
non-bias [1] - 2661:6
non-identification [1]
- 2690:40
non-objective [1] -
2682:21
non-responsive [3] -
2694:15, 2694:17,
2694:21
none [1] - 2633:14
nonetheless [1] -
2706:23
nonsense [2] -
2620:46, 2635:11
note [1] - 2610:38
notes [1] - 2619:34
nothing [5] - 2693:32,
2698:7, 2703:15,
2705:11, 2715:7
notice [2] - 2671:11,
2705:15
notion [1] - 2607:46
NPL.0129.0001.0001
_0001 [1] - 2652:34
NSW [6] - 2606:38,
2608:28, 2608:45,
2612:20, 2646:2,
2661:34
nuance [1] - 2640:10
nuanced [2] -
2640:12, 2642:22
number [23] - 2607:9,
2607:42, 2608:15,
2609:21, 2614:20,
2614:32, 2617:14,
2620:1, 2627:14,
2628:21, 2636:27,
2639:43, 2651:27,
2666:30, 2689:35,
2692:3, 2703:9,
2704:35, 2713:44,
2714:7, 2715:5,
2715:12, 2716:34
numbers [6] -
2620:22, 2622:23,
2639:6, 2639:10,
2639:13, 2706:30
numerical [2] -
2656:44, 2689:25
-
- O**
-
- O'Brien** [1] - 2606:31
o'clock [2] - 2667:43,
2718:3
oath [2] - 2607:5,
2619:22

- object** ^[5] - 2612:40, 2628:37, 2694:10, 2700:22, 2709:30
- objection** ^[4] - 2694:18, 2694:19, 2694:20, 2709:32
- objective** ^[12] - 2607:15, 2607:17, 2609:16, 2631:11, 2631:25, 2631:26, 2631:43, 2632:6, 2632:38, 2633:12, 2682:21, 2684:39
- objectives** ^[1] - 2607:36
- obliged** ^[1] - 2694:23
- obscure** ^[1] - 2673:14
- observations** ^[1] - 2660:21
- observe** ^[2] - 2660:39, 2701:41
- observed** ^[1] - 2689:5
- observer** ^[1] - 2609:16
- observes** ^[2] - 2660:44, 2687:21
- obsessed** ^[1] - 2629:29
- obtained** ^[1] - 2636:1
- obvious** ^[2] - 2611:15, 2611:39
- obviously** ^[9] - 2609:36, 2612:9, 2613:15, 2638:36, 2640:30, 2654:24, 2667:39, 2704:46, 2716:9
- occasionally** ^[1] - 2687:14
- occur** ^[2] - 2639:28, 2653:37
- occurred** ^[3] - 2636:20, 2706:38, 2706:40
- occurs** ^[3] - 2638:41, 2677:1, 2677:5
- October** ^[1] - 2710:43
- odd** ^[4] - 2611:32, 2611:33, 2643:21, 2651:40
- odds** ^[1] - 2688:32
- OF** ^[1] - 2718:12
- offence** ^[4] - 2636:19, 2636:20, 2702:7, 2702:25
- offences** ^[3] - 2639:23, 2640:45, 2641:7
- offender** ^[1] - 2712:2
- offender's** ^[2] - 2690:38, 2702:29
- offending** ^[1] - 2641:13
- offensive** ^[2] - 2609:39, 2612:24
- offer** ^[4] - 2643:3, 2644:14, 2646:20, 2647:16
- offered** ^[3] - 2643:24, 2654:46, 2702:21
- offering** ^[2] - 2644:13, 2647:21
- offers** ^[1] - 2671:28
- officer** ^[7] - 2620:37, 2653:29, 2670:4, 2676:18, 2677:35, 2678:44, 2679:37
- Officer** ^[1] - 2609:33
- officer's** ^[3] - 2678:21, 2678:31, 2678:34
- officers** ^[11] - 2608:45, 2618:31, 2651:5, 2653:16, 2653:29, 2654:10, 2677:27, 2677:42, 2678:19, 2687:27
- official** ^[2] - 2622:12, 2622:20
- often** ^[10] - 2615:32, 2618:33, 2619:11, 2624:26, 2631:16, 2636:35, 2637:29, 2641:10, 2659:35, 2678:12
- okay** ^[2] - 2680:36, 2695:15
- old** ^[3] - 2680:17, 2715:6
- older** ^[1] - 2715:13
- omitted** ^[1] - 2641:20
- once** ^[6] - 2619:31, 2623:7, 2623:16, 2626:27, 2630:24, 2630:34
- one** ^[117] - 2608:44, 2610:8, 2611:7, 2613:11, 2613:32, 2615:4, 2615:28, 2615:30, 2616:47, 2617:22, 2617:39, 2617:40, 2617:46, 2619:8, 2619:24, 2620:4, 2620:12, 2622:29, 2623:20, 2624:38, 2627:8, 2627:25, 2627:29, 2628:31, 2629:14, 2629:24, 2629:32, 2630:13, 2630:29, 2630:38, 2631:31, 2636:4, 2636:34, 2636:39, 2637:1, 2637:16, 2638:4, 2638:9, 2638:10, 2638:25, 2638:39, 2638:43, 2639:1, 2639:6, 2639:10, 2639:14, 2639:15, 2639:16, 2639:20, 2640:14, 2641:20, 2642:34, 2642:37, 2643:26, 2643:28, 2644:4, 2644:30, 2649:5, 2649:10, 2650:33, 2650:35, 2652:44, 2656:36, 2657:15, 2657:26, 2657:30, 2659:19, 2659:46, 2660:2, 2662:14, 2662:34, 2664:36, 2665:30, 2666:17, 2667:29, 2670:12, 2672:6, 2674:36, 2675:10, 2676:38, 2676:43, 2678:2, 2678:31, 2678:40, 2680:18, 2685:7, 2686:21, 2686:35, 2687:43, 2689:29, 2691:42, 2692:19, 2692:40, 2692:44, 2693:6, 2693:11, 2693:14, 2693:16, 2694:21, 2698:2, 2703:11, 2707:27, 2708:30, 2708:35, 2709:26, 2710:29, 2711:27, 2711:28, 2712:41, 2713:10, 2714:31, 2715:26, 2715:34, 2716:39
- one's** ^[2] - 2622:22, 2630:29
- onerous** ^[1] - 2627:36
- ones** ^[3] - 2706:16, 2706:22, 2706:23
- opaque** ^[1] - 2619:6
- open** ^[3] - 2621:45, 2661:7, 2687:11
- open-ended** ^[1] - 2621:45
- opening** ^[1] - 2625:27
- operate** ^[1] - 2611:4
- opinion** ^[6] - 2620:26, 2661:17, 2676:17, 2680:17, 2685:3
- opinions** ^[1] - 2685:10
- opportunity** ^[6] - 2625:31, 2625:41, 2633:6, 2643:33, 2674:13, 2699:47
- opposed** ^[3] - 2663:29, 2685:33, 2712:20
- opposite** ^[1] - 2645:37
- option** ^[1] - 2671:40
- order** ^[9] - 2633:14, 2642:38, 2653:37, 2655:37, 2655:38, 2655:39, 2666:15, 2676:10, 2680:47
- organisation** ^[2] - 2621:18, 2669:26
- organised** ^[5] - 2636:38, 2636:43, 2655:38, 2667:37, 2685:41
- orient** ^[1] - 2715:30
- original** ^[10] - 2616:41, 2649:12, 2649:21, 2649:28, 2649:33, 2650:36, 2653:33, 2654:4, 2654:19, 2655:7
- ostensibly** ^[1] - 2629:35
- otherwise** ^[4] - 2642:21, 2682:19, 2684:20, 2691:17
- ought** ^[1] - 2713:31
- outcome** ^[1] - 2665:1
- outer** ^[2] - 2621:15, 2621:17
- outlier** ^[2] - 2623:30, 2623:33
- outrageous** ^[1] - 2634:37
- outset** ^[2] - 2608:6, 2623:6
- outside** ^[3] - 2609:46, 2612:10, 2634:40
- outsider** ^[2] - 2619:7, 2619:43
- outstanding** ^[1] - 2708:38
- overall** ^[2] - 2607:15, 2664:12
- overlap** ^[2] - 2669:33, 2669:34
- overlay** ^[1] - 2655:33
- overlooked** ^[1] - 2615:29
- own** ^[18] - 2618:28, 2625:39, 2627:27, 2631:24, 2638:16, 2642:31, 2643:40, 2644:6, 2644:46, 2646:37, 2680:32, 2681:22, 2681:30, 2681:45, 2682:2, 2682:41, 2685:42, 2709:26

P

- paedo** ^[2] - 2640:15, 2640:18
- paedophile** ^[29] - 2629:37, 2635:23, 2639:39, 2639:44, 2640:33, 2641:2, 2641:6, 2689:29, 2690:9, 2705:38, 2706:1, 2706:6, 2706:22, 2706:44, 2707:39, 2708:9, 2712:21, 2712:34, 2712:45, 2713:1, 2713:3, 2713:11, 2713:20, 2713:36, 2713:39, 2713:47, 2714:3, 2715:8
- paedophiles** ^[6] - 2641:10, 2642:6, 2706:46, 2707:34, 2707:46
- paedophilia** ^[8] - 2635:21, 2640:38, 2640:41, 2715:7, 2715:14, 2715:39, 2716:13, 2717:8
- page** ^[70] - 2613:6, 2613:7, 2641:29, 2641:44, 2641:45, 2642:10, 2642:25, 2643:46, 2644:17, 2644:38, 2645:22, 2645:31, 2646:14, 2646:40, 2648:35, 2648:41, 2656:8, 2656:12, 2656:16, 2656:22, 2656:47, 2657:19, 2657:27, 2658:37, 2658:38, 2659:2, 2659:19, 2659:20, 2659:33, 2660:13, 2660:32, 2663:21, 2666:23, 2666:46, 2667:1, 2667:21, 2671:22, 2682:11, 2687:5, 2687:6, 2687:12, 2687:36, 2687:44, 2688:26, 2689:23, 2689:36, 2690:28, 2694:4, 2695:10, 2697:4, 2699:30, 2700:27, 2700:28, 2700:39, 2702:20, 2702:22, 2705:36, 2706:4, 2709:43,

- 2713:43, 2715:5,
2715:12, 2715:32
pages [14] - 2626:30,
2644:12, 2651:27,
2651:28, 2652:4,
2652:8, 2652:21,
2652:26, 2652:44,
2656:4, 2686:47,
2687:1, 2687:36,
2690:28
paper [7] - 2609:47,
2653:17, 2653:24,
2653:34, 2653:39,
2655:29, 2662:19
papered [1] - 2614:27
papers [1] - 2679:17
paragraph [38] -
2610:14, 2641:30,
2645:31, 2658:46,
2659:32, 2659:33,
2660:43, 2660:44,
2661:16, 2671:23,
2671:31, 2672:15,
2673:8, 2674:1,
2682:12, 2682:28,
2682:38, 2683:10,
2683:32, 2685:37,
2685:47, 2687:20,
2687:43, 2688:9,
2688:12, 2688:27,
2690:45, 2695:31,
2697:3, 2699:30,
2700:32, 2701:14,
2701:26, 2701:46,
2711:44, 2712:27,
2712:31
paragraphs [1] -
2688:9
parameter [1] - 2623:7
parameters [1] -
2655:33
pardon [7] - 2612:33,
2615:41, 2634:8,
2639:8, 2678:9,
2693:11, 2693:13
Parrabell [26] -
2607:13, 2607:15,
2610:9, 2616:19,
2616:40, 2630:24,
2630:28, 2643:18,
2643:30, 2645:27,
2648:27, 2651:4,
2651:5, 2651:20,
2651:43, 2651:47,
2652:24, 2653:1,
2653:16, 2655:29,
2655:44, 2659:23,
2667:5, 2686:20,
2689:23, 2715:28
Parramatta [1] -
2620:39
part [41] - 2607:12,
2607:36, 2613:39,
2614:7, 2625:35,
2626:9, 2634:12,
2634:39, 2642:40,
2642:41, 2643:16,
2656:5, 2656:9,
2659:33, 2661:47,
2663:4, 2671:20,
2671:44, 2677:35,
2678:21, 2678:23,
2687:26, 2698:29,
2698:30, 2698:32,
2698:36, 2698:46,
2699:20, 2699:37,
2702:8, 2702:12,
2702:17, 2702:28,
2702:31, 2702:34,
2704:20, 2709:44,
2715:26, 2716:19,
2717:2
partially [1] - 2658:23
participated [1] -
2648:26
particular [16] -
2627:42, 2631:28,
2652:44, 2653:18,
2653:29, 2653:30,
2661:9, 2663:30,
2675:39, 2676:17,
2677:35, 2678:4,
2678:26, 2678:32,
2687:27, 2688:47
particularly [7] -
2619:15, 2624:15,
2624:45, 2632:10,
2637:32, 2665:41,
2703:40
parties [2] - 2608:30,
2615:10
partly [4] - 2686:19,
2702:44, 2703:8,
2704:19
parts [11] - 2632:35,
2633:7, 2652:47,
2659:47, 2668:40,
2668:41, 2669:30,
2671:36, 2672:2,
2677:23, 2685:36
passage [4] - 2619:42,
2646:47, 2688:31,
2700:45
passion [1] - 2624:13
passionate [7] -
2621:2, 2621:38,
2621:45, 2623:9,
2624:3, 2624:12,
2624:15
past [5] - 2617:10,
2618:27, 2635:42,
2638:46, 2716:17
patchy [1] - 2614:46
pattern [1] - 2716:30
paucity [2] - 2615:33,
2615:35
Paul [1] - 2619:16
pay [2] - 2622:29,
2628:15
paying [1] - 2628:6
paywall [1] - 2630:36
pejorative [1] -
2625:43
pejoratively [1] -
2681:45
people [24] - 2611:4,
2619:22, 2621:10,
2621:18, 2622:16,
2624:24, 2626:47,
2627:14, 2628:4,
2636:39, 2636:41,
2640:37, 2640:45,
2641:11, 2651:9,
2677:12, 2680:5,
2716:7, 2716:8,
2716:17, 2716:21,
2716:22, 2716:24,
2716:27
per [3] - 2622:27,
2644:30, 2656:38
perceive [1] - 2703:39
perceived [2] -
2640:32
perceiving [1] -
2703:14
perception [3] -
2620:33, 2667:38,
2695:4
perfectly [2] - 2612:6,
2705:26
performed [1] -
2654:20
Perhaps [1] - 2666:20
perhaps [38] -
2607:43, 2608:22,
2608:29, 2608:34,
2609:30, 2609:39,
2611:30, 2617:36,
2621:23, 2621:44,
2624:25, 2625:19,
2626:28, 2627:26,
2631:3, 2635:42,
2637:44, 2639:2,
2640:16, 2641:12,
2645:28, 2648:7,
2648:9, 2649:31,
2650:1, 2658:2,
2661:17, 2663:27,
2666:43, 2677:32,
2677:46, 2678:8,
2681:29, 2699:32,
2704:3, 2713:24,
2713:28, 2717:7
period [2] - 2609:34,
2617:47
permit [2] - 2650:35,
2686:16
permits [1] - 2701:31
permitted [1] -
2694:47
permutations [1] -
2678:3
perpetrator [15] -
2635:3, 2635:5,
2635:7, 2635:16,
2635:32, 2635:39,
2636:10, 2636:18,
2639:16, 2691:13,
2706:44, 2707:4,
2707:28, 2712:47,
2713:4
perpetrator's [2] -
2708:3, 2708:10
perpetrators [4] -
2636:11, 2639:10,
2639:14, 2640:17
persist [1] - 2681:35
person [44] - 2618:31,
2619:7, 2621:3,
2621:17, 2623:29,
2626:43, 2635:6,
2635:8, 2635:12,
2635:30, 2635:40,
2635:41, 2636:39,
2637:1, 2638:44,
2641:5, 2650:17,
2650:18, 2669:26,
2680:26, 2690:34,
2690:37, 2690:40,
2691:24, 2691:26,
2692:30, 2694:17,
2694:22, 2697:40,
2703:12, 2703:14,
2703:25, 2703:33,
2703:34, 2703:36,
2703:37, 2703:39,
2704:41, 2706:43,
2706:45, 2707:4,
2707:45
person's [5] -
2640:14, 2640:15,
2707:43, 2708:2
personal [1] - 2638:41
personality [1] -
2620:19
personally [2] -
2627:36, 2650:6
persons [2] - 2702:26,
2702:27
perspective [4] -
2607:30, 2641:14,
2670:8, 2670:10
persuasion [1] -
2638:15
perverse [1] - 2642:4
perverted [1] -
2609:12
Peter [1] - 2606:30
PhD [1] - 2623:17
phenomenon [4] -
2626:25, 2640:9,
2668:29, 2668:39
phone [1] - 2620:36
phrase [8] - 2616:16,
2627:30, 2629:27,
2629:35, 2629:46,
2631:1, 2699:12,
2699:14
phrases [1] - 2629:34
pick [2] - 2625:19,
2681:20
pivotal [1] - 2674:23
place [5] - 2675:39,
2692:46, 2704:38,
2708:16, 2717:47
placed [6] - 2635:46,
2636:4, 2665:47,
2681:32, 2713:35,
2713:47
places [1] - 2671:2
placing [1] - 2680:26
plain [4] - 2608:45,
2645:37, 2674:37,
2680:30
plainly [2] - 2627:12,
2695:46
plan [1] - 2630:26
plane [1] - 2621:6
planet [1] - 2640:31
planned [3] - 2638:38,
2701:42, 2701:44
play [3] - 2607:23,
2607:44, 2631:20
played [1] - 2713:29
plays [1] - 2702:43
plus [2] - 2684:13,
2685:7
point [35] - 2608:42,
2610:39, 2614:45,
2617:35, 2627:21,
2628:41, 2633:20,
2633:22, 2633:24,
2642:2, 2643:2,
2643:6, 2646:9,
2649:6, 2649:25,
2654:36, 2660:38,
2661:36, 2663:27,
2665:42, 2667:33,
2673:27, 2673:42,
2673:47, 2675:47,

2696:28, 2703:3,
2710:30, 2711:12,
2711:13, 2711:14,
2711:15, 2711:20
pointed [6] - 2628:24,
2630:12, 2645:21,
2672:35, 2680:15,
2701:25
pointing [7] - 2666:18,
2687:13, 2687:16,
2688:20, 2700:31,
2700:35, 2701:22
points [4] - 2623:43,
2671:35, 2677:30,
2677:43
Police [7] - 2606:38,
2608:28, 2608:45,
2612:20, 2618:35,
2646:2, 2661:34
police [108] - 2607:31,
2607:35, 2608:40,
2609:1, 2609:9,
2609:17, 2613:22,
2613:33, 2613:37,
2613:47, 2614:2,
2614:13, 2614:21,
2614:23, 2614:25,
2614:37, 2615:3,
2615:40, 2615:43,
2618:7, 2618:12,
2618:15, 2618:30,
2618:31, 2618:39,
2618:41, 2619:6,
2619:47, 2620:2,
2620:34, 2620:37,
2620:40, 2623:41,
2626:23, 2629:23,
2629:42, 2639:37,
2644:27, 2648:47,
2649:7, 2650:3,
2650:15, 2650:17,
2650:20, 2651:4,
2651:5, 2652:25,
2653:38, 2655:9,
2656:4, 2657:23,
2659:25, 2663:8,
2663:17, 2663:30,
2663:47, 2664:1,
2664:5, 2664:12,
2664:46, 2669:47,
2671:23, 2673:39,
2675:10, 2675:30,
2676:9, 2676:17,
2677:27, 2677:35,
2677:42, 2678:19,
2678:21, 2678:26,
2678:31, 2678:34,
2678:44, 2679:13,
2681:21, 2682:13,
2682:18, 2684:19,
2684:45, 2687:25,
2689:34, 2690:22,
2698:35, 2698:45,
2702:6, 2702:18,
2702:21, 2702:23,
2707:10, 2709:4,
2709:7, 2709:8,
2709:17, 2709:22,
2709:24, 2710:8,
2710:22, 2710:24,
2710:26, 2710:28,
2710:45, 2711:7,
2711:34, 2711:46,
2714:11
police's [2] - 2652:23,
2709:18
polite [1] - 2619:4
politely [1] - 2634:32
political [2] - 2621:8
poor [1] - 2641:4
poorly [1] - 2640:21
popped [1] - 2634:12
popular [1] - 2628:9
populated [1] - 2653:2
population [1] -
2695:37
portion [1] - 2678:11
portrayal [1] - 2632:44
posed [1] - 2628:43
posing [1] - 2646:4
position [6] - 2626:3,
2638:16, 2676:4,
2691:41, 2694:20,
2703:15
possession [1] -
2649:46
possibility [2] -
2650:5, 2703:20
possible [9] -
2623:10, 2627:22,
2663:28, 2673:41,
2677:7, 2677:8,
2708:43, 2714:41,
2714:47
possibly [3] - 2670:5,
2692:28, 2697:39
post [3] - 2609:13,
2628:43, 2629:1
potential [1] - 2627:13
potentially [2] -
2639:16, 2644:39
powers [1] - 2638:15
practice [1] - 2680:47
practices [1] -
2608:44
pre [2] - 2609:13,
2628:43
preceding [2] -
2672:44, 2682:28
precise [5] - 2610:2,
2612:47, 2663:8,
2664:28, 2664:31
precisely [5] -
2628:37, 2628:39,
2654:46, 2666:6,
2681:27
precluded [1] -
2608:34
preconceived [1] -
2607:46
predation [1] -
2690:36
prefer [2] - 2613:9,
2664:20
preference [1] -
2705:30
prefers [1] - 2632:4
preliminary [1] -
2667:4
premise [1] - 2675:13
presence [1] -
2673:21
Present [1] - 2606:35
present [7] - 2672:12,
2672:45, 2681:31,
2685:2, 2699:28,
2702:43, 2707:3
preserve [1] - 2640:17
press [1] - 2630:35
pressure [5] - 2608:5,
2608:8, 2619:20,
2619:28, 2624:7
presumably [2] -
2633:18, 2655:8
presume [2] - 2611:6,
2646:1
presumption [1] -
2611:3
pretty [8] - 2614:46,
2617:11, 2621:18,
2627:36, 2632:2,
2632:14, 2706:35,
2711:7
prevented [1] - 2695:4
previous [3] -
2611:12, 2611:40,
2682:38
prey [1] - 2703:34
primarily [2] -
2665:45, 2680:27
primary [1] - 2687:39
proactive [10] -
2636:5, 2636:10,
2636:29, 2636:36,
2637:47, 2638:33,
2638:38, 2638:42,
2639:12, 2643:9
proactive/reactive [1]
- 2629:18
probabilities [1] -
2671:46
problem [15] - 2610:7,
2610:8, 2628:40,
2630:34, 2634:39,
2635:36, 2636:39,
2643:12, 2643:34,
2644:1, 2665:41,
2682:32, 2706:26,
2711:5, 2717:28
problematic [2] -
2672:3, 2679:30
problems [5] -
2614:20, 2660:33,
2665:13, 2672:44,
2687:17
proceedings [1] -
2638:23
process [20] - 2615:5,
2615:26, 2617:31,
2617:32, 2619:6,
2622:24, 2625:5,
2636:34, 2651:41,
2651:43, 2671:45,
2672:2, 2673:20,
2676:9, 2689:7,
2689:10, 2689:12,
2689:18, 2708:12,
2716:26
procure [1] - 2677:19
produce [4] - 2677:14,
2678:3, 2678:11,
2712:14
produced [2] -
2610:18, 2678:40
produces [3] -
2690:35, 2701:28,
2712:4
producing [6] -
2607:38, 2607:43,
2676:16, 2676:17,
2677:34, 2702:38
product [1] - 2641:11
professed [1] - 2616:7
professionals [1] -
2622:32
Professor [30] -
2607:11, 2612:24,
2613:29, 2615:27,
2618:36, 2622:22,
2623:21, 2625:30,
2629:17, 2632:1,
2632:28, 2641:2,
2641:22, 2646:47,
2660:39, 2660:47,
2661:17, 2661:18,
2664:35, 2670:14,
2670:30, 2670:41,
2671:3, 2672:1,
2675:42, 2677:2,
2682:45, 2683:16,
2687:16
professor [1] -
2626:46
profound [3] -
2613:45, 2615:33,
2627:33
profoundly [3] -
2610:24, 2617:46
project [10] - 2624:13,
2627:11, 2674:2,
2674:12, 2674:41,
2674:44, 2674:47,
2675:4, 2675:16,
2675:22
projects [1] - 2675:44
promoted [1] -
2626:44
promotion [2] -
2626:44, 2626:47
prompt [3] - 2678:22,
2678:33, 2680:10
prompted [3] -
2680:6, 2680:7,
2714:15
prompts [15] -
2657:46, 2663:31,
2666:26, 2677:23,
2677:33, 2677:44,
2678:1, 2678:20,
2680:4, 2680:7,
2684:46, 2685:6,
2687:15
proof [4] - 2629:43,
2671:36, 2672:2,
2672:5
properly [1] - 2617:41
property [1] - 2702:27
proposition [4] -
2637:25, 2642:8,
2642:9, 2709:37
prosecuted [1] -
2641:8
prospect [1] - 2626:4
protocol [1] - 2688:41
prove [1] - 2658:16
provide [10] - 2644:7,
2655:36, 2660:5,
2666:28, 2667:23,
2667:28, 2668:5,
2668:24, 2676:10,
2678:30
provided [11] -
2630:40, 2655:35,
2656:35, 2656:38,
2668:1, 2668:46,
2670:19, 2681:29,
2704:16, 2704:18,
2707:10
provides [1] - 2667:30
providing [1] - 2695:4

- provoked** [1] - 2637:18
proximity [1] - 2613:45
psychiatrist [1] - 2637:39
psychic [2] - 2637:37, 2638:41
psychological [1] - 2618:28
public [2] - 2608:46, 2714:1
published [2] - 2715:29, 2716:3
pull [1] - 2618:44
pulling [1] - 2609:1
pun [1] - 2678:9
purely [1] - 2662:27
purport [1] - 2694:43
purporting [1] - 2676:5
purports [1] - 2676:2
purpose [15] - 2643:23, 2647:9, 2647:20, 2647:22, 2655:30, 2655:32, 2655:34, 2655:36, 2655:40, 2660:18, 2661:24, 2679:33, 2679:34, 2687:37, 2703:38
purposes [10] - 2628:1, 2628:13, 2651:13, 2666:18, 2672:46, 2680:6, 2681:23, 2682:19, 2684:20, 2685:42
push [1] - 2692:34
pushed [5] - 2692:16, 2692:31, 2697:32, 2697:41, 2698:1
put [57] - 2608:7, 2609:40, 2609:47, 2610:14, 2612:4, 2612:45, 2613:7, 2613:31, 2614:14, 2616:11, 2622:3, 2622:8, 2624:10, 2630:28, 2630:29, 2633:7, 2633:15, 2633:34, 2633:35, 2634:13, 2634:16, 2634:19, 2635:33, 2639:28, 2642:9, 2642:10, 2642:12, 2642:16, 2642:24, 2645:25, 2645:45, 2654:1, 2655:34, 2660:12, 2671:15, 2671:16, 2675:21, 2680:13, 2681:45, 2684:44, 2686:39, 2687:24, 2687:39, 2696:8, 2697:11, 2697:43, 2698:26, 2698:32, 2698:33, 2705:8, 2707:40, 2708:13, 2709:37, 2712:44, 2714:15, 2716:27
putting [20] - 2622:4, 2627:4, 2631:32, 2633:11, 2633:45, 2637:18, 2643:33, 2652:22, 2662:41, 2662:47, 2664:44, 2665:5, 2677:22, 2680:26, 2687:45, 2687:46, 2697:44, 2707:38, 2712:38, 2715:20

Q

qua [1] - 2646:2
qualifier [1] - 2673:6
qualify [3] - 2630:23, 2686:23, 2694:45
qualifying [1] - 2691:40
quality [6] - 2617:38, 2653:23, 2653:38, 2653:45, 2654:2, 2654:3
Quantico [1] - 2613:43
query [1] - 2659:23
questioning [1] - 2717:30
questions [45] - 2607:10, 2608:16, 2609:22, 2614:32, 2614:38, 2617:30, 2619:5, 2619:13, 2620:29, 2621:1, 2625:17, 2627:40, 2628:19, 2628:21, 2628:43, 2629:14, 2630:10, 2633:19, 2635:47, 2636:27, 2636:28, 2637:17, 2637:47, 2638:7, 2638:28, 2641:31, 2644:37, 2645:45, 2646:4, 2646:6, 2652:26, 2656:42, 2658:32, 2663:11, 2663:16, 2663:31, 2664:25, 2666:26, 2667:4, 2667:11, 2667:22, 2668:23, 2678:10, 2683:34, 2695:5
quickly [2] - 2608:24, 2617:11
quicksand [1] - 2618:4
quite [28] - 2608:41, 2611:18, 2611:22, 2611:28, 2611:36, 2615:22, 2615:25, 2619:6, 2619:11, 2621:14, 2621:16, 2621:25, 2622:26, 2625:5, 2627:4, 2629:5, 2637:46, 2642:12, 2643:14, 2644:21, 2644:30, 2645:46, 2647:11, 2650:21, 2654:17, 2674:37, 2683:42, 2715:25
quotation [2] - 2648:38, 2648:46
quotations [1] - 2651:9
quote [3] - 2641:4, 2687:16, 2688:29
quoted [4] - 2621:30, 2654:37, 2654:40, 2688:31
quoting [2] - 2619:26, 2681:7

R

raised [1] - 2614:37
ran [1] - 2651:27
random [1] - 2617:14
randomly [2] - 2617:40, 2618:2
ranking [1] - 2656:44
rate [3] - 2622:30, 2714:12
rates [1] - 2622:21
rather [13] - 2609:17, 2611:33, 2615:17, 2622:3, 2628:7, 2630:32, 2631:10, 2632:5, 2633:36, 2636:37, 2642:23, 2642:36, 2703:35
rational [1] - 2636:33
re [1] - 2700:7
re-read [1] - 2700:7
reach [6] - 2614:44, 2619:21, 2620:25, 2708:43, 2709:39, 2710:45
reached [1] - 2689:25
reaching [2] - 2614:39, 2709:27
react [1] - 2637:39
reaction [3] - 2638:41, 2701:8, 2716:16
reactive [10] - 2636:5, 2636:18, 2636:30, 2636:36, 2636:46, 2638:34, 2639:13, 2639:28, 2701:43, 2701:45
reacts [1] - 2716:9
read [53] - 2610:37, 2611:7, 2613:6, 2619:43, 2623:14, 2623:15, 2623:18, 2623:32, 2624:30, 2624:43, 2630:47, 2631:36, 2633:2, 2633:16, 2633:18, 2633:25, 2634:24, 2634:34, 2641:5, 2641:46, 2646:13, 2646:14, 2646:17, 2646:18, 2659:5, 2659:31, 2670:15, 2670:16, 2670:24, 2670:25, 2670:27, 2670:31, 2670:34, 2670:40, 2670:42, 2671:6, 2671:31, 2672:24, 2682:38, 2683:1, 2683:22, 2687:20, 2687:21, 2693:31, 2700:7, 2700:9, 2700:27, 2712:26
reader [4] - 2641:40, 2644:3, 2673:24, 2706:29
readers [2] - 2706:29, 2716:34
readily [1] - 2630:46
reading [8] - 2611:15, 2611:40, 2624:32, 2680:17, 2680:40, 2681:37, 2702:15, 2703:11
reads [1] - 2644:5
real [6] - 2644:40, 2645:14, 2647:3, 2647:6, 2647:7, 2691:19
realised [1] - 2617:44
realistically [1] - 2669:42
reality [8] - 2622:29, 2623:44, 2630:2, 2677:33, 2680:15, 2680:30, 2680:31, 2684:45
really [35] - 2608:6, 2619:17, 2619:18, 2621:5, 2623:9, 2624:5, 2624:12, 2627:2, 2629:39, 2631:17, 2637:16, 2639:4, 2640:10, 2641:6, 2643:28, 2645:36, 2653:43, 2664:44, 2665:40, 2679:2, 2679:15, 2680:16, 2682:40, 2685:28, 2696:30, 2702:17, 2703:28, 2710:12, 2711:35, 2716:20, 2716:31
rear [1] - 2639:3
reason [19] - 2617:29, 2642:14, 2642:35, 2644:10, 2644:15, 2645:2, 2645:15, 2645:31, 2646:41, 2647:4, 2647:6, 2647:7, 2676:15, 2677:23, 2677:43, 2680:32, 2680:44, 2690:18, 2701:8
reasonⁿ [1] - 2680:45
reasonable [13] - 2612:19, 2628:35, 2629:1, 2629:15, 2629:23, 2629:29, 2629:43, 2658:16, 2658:27, 2671:39, 2672:9, 2690:23, 2708:19
reasoning [1] - 2636:33
reasons [14] - 2610:10, 2627:25, 2631:3, 2641:41, 2642:16, 2643:22, 2644:16, 2644:40, 2671:30, 2676:43, 2683:42, 2687:39, 2687:45, 2687:46
recalibrate [1] - 2607:22
recalling [1] - 2642:1
received [2] - 2630:13, 2686:36
recently [1] - 2650:23
recognised [1] - 2665:13
recollection [9] - 2616:35, 2619:35, 2632:2, 2633:35, 2633:37, 2638:3, 2638:4, 2638:8

2660:35
reconstructed [1] - 2659:46
record [1] - 2622:10
recorded [2] - 2678:38, 2678:39
recording [2] - 2682:19, 2684:20
recurrent [1] - 2639:20
redundant [1] - 2669:30
refer [2] - 2646:41, 2656:15
reference [6] - 2641:32, 2650:1, 2667:27, 2677:31, 2700:14, 2700:37
Reference [2] - 2650:34, 2650:39
Reference" [1] - 2648:42
references [3] - 2608:16, 2611:11, 2686:39
referred [2] - 2671:2, 2677:6
referring [6] - 2613:28, 2658:46, 2688:30, 2688:37, 2696:36, 2703:32
refers [4] - 2689:6, 2702:17, 2702:20, 2702:31
reflect [1] - 2717:10
reflected [2] - 2617:33, 2678:39
refresh [3] - 2616:35, 2633:35, 2637:43
refuse [1] - 2638:25
regard [3] - 2609:26, 2634:6, 2661:13
regarded [4] - 2625:40, 2627:26, 2634:10, 2706:22
regarding [1] - 2645:40
regularly [1] - 2636:43
reinvestigation [1] - 2678:36
reject [1] - 2647:18
rejected [9] - 2617:25, 2643:40, 2644:15, 2644:27, 2644:40, 2645:32, 2646:41, 2647:4, 2647:7
rejecting [1] - 2645:15
related [4] - 2667:8, 2677:9, 2685:6, 2716:16
relates [2] - 2666:12, 2702:34
relating [2] - 2691:18, 2713:12
relation [6] - 2607:11, 2618:7, 2629:31, 2643:15, 2665:11, 2665:45
relationship [8] - 2643:4, 2643:24, 2644:14, 2647:16, 2647:22, 2676:39, 2676:41
relevance [1] - 2678:45
relevant [10] - 2642:42, 2655:37, 2675:41, 2678:22, 2678:37, 2678:38, 2678:43, 2679:17, 2684:1, 2706:7
relevantly [1] - 2685:2
reliability [4] - 2653:27, 2672:18, 2675:12, 2677:4
reliable [1] - 2631:6
relief [1] - 2628:15
reluctant [6] - 2659:11, 2676:28, 2676:33, 2676:43, 2681:39, 2681:47
relying [1] - 2643:7
remain [1] - 2648:7
remarks [1] - 2651:9
remember [25] - 2610:2, 2611:9, 2612:28, 2615:2, 2615:44, 2616:7, 2616:10, 2616:22, 2617:8, 2619:15, 2619:16, 2619:33, 2619:39, 2620:38, 2622:11, 2623:20, 2626:43, 2629:30, 2637:31, 2637:35, 2638:16, 2650:23, 2665:6, 2702:8, 2708:12
reminded [1] - 2642:25
render [1] - 2672:44
repeat [2] - 2677:46, 2714:24
repeatable [2] - 2632:38, 2633:12
repeated [3] - 2637:2, 2637:5, 2644:29
repeating [1] - 2661:21
repetition [2] - 2639:23, 2678:12
repetitive [1] - 2639:19
rephrase [2] - 2611:28, 2633:30
replaced [1] - 2626:29
replicate [3] - 2674:14, 2675:12, 2675:32
replicating [1] - 2675:5
report [62] - 2607:35, 2609:6, 2609:41, 2610:37, 2613:47, 2614:7, 2614:16, 2619:41, 2629:16, 2630:12, 2630:18, 2631:24, 2631:36, 2632:4, 2634:3, 2635:46, 2636:9, 2641:1, 2643:18, 2643:30, 2646:22, 2646:25, 2651:17, 2651:20, 2652:1, 2653:1, 2655:28, 2655:43, 2655:44, 2656:5, 2657:17, 2658:37, 2663:43, 2664:2, 2670:13, 2670:16, 2670:17, 2670:24, 2670:30, 2670:43, 2671:3, 2671:13, 2672:38, 2675:10, 2683:38, 2687:39, 2687:43, 2687:44, 2689:23, 2690:28, 2699:22, 2699:25, 2699:35, 2699:47, 2700:7, 2700:10, 2703:27, 2705:36, 2705:37, 2715:27, 2715:28
reporting [2] - 2673:13, 2703:30
reports [7] - 2630:40, 2630:44, 2630:47, 2631:47, 2636:1, 2639:38, 2650:27
represent [1] - 2700:22
representation [1] - 2628:10
representative [1] - 2618:3
representing [1] - 2700:20
represents [1] - 2674:24
reproduce [1] - 2711:33
request [4] - 2608:17, 2648:37, 2648:38, 2648:46
require [5] - 2678:25, 2700:34, 2701:4, 2701:41, 2703:1
required [2] - 2623:11, 2649:13
requirement [17] - 2629:15, 2629:43, 2658:13, 2669:35, 2674:11, 2674:46, 2675:4, 2675:6, 2691:42, 2693:6, 2693:17, 2695:32, 2695:47, 2696:29, 2697:13, 2701:27, 2701:40
requirements [2] - 2664:19, 2673:30
requires [5] - 2676:15, 2682:33, 2684:33, 2684:38, 2691:1
requiring [1] - 2609:13
requisite [1] - 2664:18
research [23] - 2618:28, 2618:35, 2618:39, 2624:34, 2627:45, 2628:2, 2630:26, 2630:29, 2642:1, 2664:16, 2674:2, 2674:12, 2674:25, 2674:32, 2674:41, 2674:44, 2674:47, 2675:16, 2675:22, 2675:36, 2675:39, 2675:44, 2716:11
researcher [3] - 2675:5, 2675:11, 2675:32
researchers [1] - 2674:13
reservations [1] - 2707:23
reserved [1] - 2626:43
resources [3] - 2617:2, 2617:26, 2623:11
respect [14] - 2612:40, 2649:26, 2653:9, 2657:5, 2657:46, 2664:5, 2664:16, 2672:9, 2672:30, 2687:38, 2694:24, 2694:26, 2699:19, 2702:18
respectful [1] - 2619:4
respond [3] - 2634:34, 2670:22, 2671:12
responding [1] - 2650:27
response [18] - 2650:24, 2660:8, 2664:2, 2667:47, 2670:19, 2670:20, 2670:45, 2671:16, 2678:22, 2678:27, 2678:31, 2678:32, 2682:10, 2682:41, 2683:15, 2686:35, 2713:9, 2716:1
responsible [2] - 2702:43, 2702:44
responsive [4] - 2694:15, 2694:17, 2694:21, 2694:39
rest [1] - 2712:26
restricted [1] - 2716:21
result [9] - 2623:28, 2631:16, 2638:37, 2659:35, 2678:25, 2688:8, 2692:2, 2710:44
results [6] - 2607:39, 2613:45, 2689:25, 2712:4, 2712:14
resume [2] - 2700:4, 2717:45
retained [1] - 2711:7
retrospect [1] - 2665:28
retrospectively [1] - 2694:19
return [1] - 2647:43
returned [1] - 2630:25
review [17] - 2607:20, 2614:30, 2630:44, 2648:27, 2649:12, 2652:10, 2653:17, 2653:37, 2653:44, 2654:3, 2655:23, 2655:29, 2659:23, 2665:15, 2701:31, 2716:26, 2716:32
Review [2] - 2643:3, 2652:37
reviewed [2] - 2649:29, 2656:28
reviewing [3] - 2653:28, 2665:16, 2716:28
revisit [1] - 2626:30
rhetorical [1] - 2710:33
rich [1] - 2630:32
Richards [1] - 2606:38
rid [2] - 2663:25,

2666:43	2665:22, 2665:24, 2665:31, 2665:32	scrutinised [1] - 2616:14	2715:2, 2715:13, 2716:42	2651:28
rightly [1] - 2708:9	scanned [1] - 2679:38	scrutinising [2] - 2609:7, 2626:47	seemingly [1] - 2703:26	several [2] - 2626:45, 2652:8
rights [1] - 2641:13	scared [2] - 2618:11, 2618:29	scrutiny [1] - 2607:20	segues [1] - 2632:8	sexual [6] - 2637:37, 2641:11, 2704:37, 2713:2, 2713:4, 2716:18
rigorous [1] - 2678:31	scenario [1] - 2704:44	se [1] - 2644:30	selecting [1] - 2679:16	sexuality [2] - 2618:15, 2627:27
rigour [6] - 2674:25, 2674:32, 2674:35, 2674:36, 2675:37, 2676:2	scene [1] - 2620:44	search [1] - 2630:32	selects [1] - 2703:37	shared [1] - 2661:18
risk [1] - 2618:38	scenes [1] - 2620:45	seat [1] - 2700:4	selling [1] - 2627:1	shine [1] - 2626:25
risked [1] - 2672:11	Scholar [2] - 2630:33, 2630:34	second [15] - 2609:39, 2620:12, 2638:44, 2641:30, 2657:30, 2682:11, 2685:47, 2686:6, 2693:42, 2699:30, 2700:32, 2700:36, 2701:16, 2701:26, 2701:31	Senior [2] - 2606:30, 2606:33	shocked [1] - 2619:2
robbed [1] - 2703:25	science [16] - 2631:9, 2631:15, 2631:18, 2674:2, 2674:12, 2674:24, 2674:41, 2674:44, 2675:16, 2675:22, 2675:44, 2676:1, 2676:3, 2677:1, 2679:33, 2679:34	secondly [1] - 2653:27	senior [2] - 2626:45, 2626:46	short [3] - 2609:33, 2624:40, 2624:41
robbery [14] - 2703:13, 2703:19, 2703:20, 2703:29, 2703:33, 2703:35, 2703:38, 2703:39, 2703:47, 2704:20, 2704:34, 2704:42, 2704:44	scientific [2] - 2674:29, 2674:30	section [6] - 2645:27, 2656:26, 2660:32, 2683:36, 2687:13, 2713:31	sense [20] - 2608:5, 2608:32, 2608:35, 2626:28, 2635:13, 2640:41, 2652:20, 2653:13, 2656:44, 2659:46, 2667:31, 2674:25, 2674:32, 2674:35, 2674:36, 2675:33, 2675:36, 2679:47, 2680:14, 2684:1	shortcomings [1] - 2665:13
robust [1] - 2631:5	scientist [2] - 2670:6, 2676:1	sections [2] - 2632:28, 2632:41	senses [1] - 2607:40	shortly [1] - 2668:12
rock [1] - 2640:14	scientists [1] - 2631:13	see [56] - 2607:38, 2613:4, 2613:7, 2619:29, 2632:9, 2639:11, 2643:32, 2646:19, 2648:1, 2649:17, 2652:37, 2652:41, 2652:47, 2653:40, 2655:7, 2655:27, 2655:37, 2656:19, 2656:22, 2656:31, 2657:22, 2657:44, 2658:13, 2659:1, 2666:1, 2666:6, 2666:18, 2668:43, 2671:25, 2673:11, 2682:12, 2687:17, 2687:40, 2688:29, 2689:36, 2690:29, 2695:7, 2702:20, 2706:29, 2708:34, 2708:47, 2709:11, 2710:3, 2711:8, 2712:6, 2712:23, 2713:11, 2713:43, 2714:33, 2714:35, 2714:45, 2715:10, 2715:44, 2715:47	sensitive [1] - 2618:43	shoulders [1] - 2625:2
role [4] - 2614:30, 2654:33, 2674:23, 2684:39	SCOI.02632_0001 [2] - 2655:44, 2689:22	see [56] - 2607:38, 2613:4, 2613:7, 2619:29, 2632:9, 2639:11, 2643:32, 2646:19, 2648:1, 2649:17, 2652:37, 2652:41, 2652:47, 2653:40, 2655:7, 2655:27, 2655:37, 2656:19, 2656:22, 2656:31, 2657:22, 2657:44, 2658:13, 2659:1, 2666:1, 2666:6, 2666:18, 2668:43, 2671:25, 2673:11, 2682:12, 2687:17, 2687:40, 2688:29, 2689:36, 2690:29, 2695:7, 2702:20, 2706:29, 2708:34, 2708:47, 2709:11, 2710:3, 2711:8, 2712:6, 2712:23, 2713:11, 2713:43, 2714:33, 2714:35, 2714:45, 2715:10, 2715:44, 2715:47	sentences [2] - 2685:47, 2686:22	show [8] - 2613:15, 2620:46, 2652:29, 2670:11, 2671:20, 2671:44, 2713:34, 2715:24
room [1] - 2638:39	SCOI.76961.00007_0001 [1] - 2648:31	seeking [5] - 2636:11, 2636:19, 2640:41, 2682:22, 2686:7	sentiment [1] - 2613:47	showed [2] - 2656:39, 2657:15
root [1] - 2614:21	SCOI.76961.00014_0001 [1] - 2713:37	seem [14] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	senses [1] - 2607:40	shown [2] - 2650:2, 2678:2
roughly [1] - 2652:12	SCOI.79339_0001 [1] - 2708:25	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	sensitive [1] - 2618:43	shy [1] - 2640:47
round [1] - 2607:27	SCOI.80025_0001 [1] - 2715:25	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	sentences [2] - 2685:47, 2686:22	sic [1] - 2640:25
rubric [1] - 2667:35	SCOI.82022_0001 [1] - 2641:23	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	sentiment [1] - 2613:47	side [5] - 2613:14, 2615:20, 2620:25, 2664:36, 2675:30
run [2] - 2621:7, 2631:16	SCOI.82365_0001 [1] - 2682:9	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	separate [2] - 2639:47, 2705:47	significant [4] - 2639:6, 2639:11, 2665:34, 2677:15
runs [5] - 2635:19, 2636:36, 2636:37, 2652:4, 2652:44	SCOI.82365_0001 [1] - 2660:13	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	separately [2] - 2639:38, 2706:22	similar [8] - 2629:36, 2635:12, 2637:10, 2667:10, 2667:14, 2686:46, 2690:4, 2699:15
Russell [1] - 2698:20	SCOI.82366.00001_0001 [1] - 2670:13	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	sentences [2] - 2685:47, 2686:22	simple [2] - 2633:11, 2643:6
	scored [4] - 2656:29, 2656:34, 2660:29, 2687:2	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	sentiment [1] - 2613:47	simply [12] - 2626:3, 2643:22, 2643:23, 2647:22, 2659:40, 2673:40, 2676:3, 2680:16, 2705:47, 2711:6, 2713:7, 2714:47
	scoring [3] - 2651:42, 2656:23, 2656:43	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	separate [2] - 2639:47, 2705:47	single [1] - 2694:11
	Scott [1] - 2624:43	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	separately [2] - 2639:38, 2706:22	sinking [1] - 2618:4
	screen [4] - 2620:12, 2634:3, 2638:6, 2641:27	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	separating [1] - 2705:37	sit [4] - 2623:30, 2623:33, 2705:16, 2718:2
	screwed [1] - 2617:41	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	Sergeant [3] - 2619:16, 2620:29, 2620:33	sites [2] - 2612:9, 2620:42
	scroll [4] - 2687:7, 2688:24, 2688:26, 2688:28	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	series [3] - 2617:39, 2657:46, 2685:9	sitting [3] - 2621:34, 2628:11, 2643:19
	scrolling [2] - 2634:1, 2634:13	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	serious [4] - 2610:8, 2614:20, 2632:11, 2639:12	situation [7] - 2637:13, 2637:24,
	scrutinise [2] - 2616:41, 2653:39	seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	sets [1] - 2671:24	
		seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	settled [1] - 2648:8	
		seemingly [1] - 2615:2, 2617:8, 2620:4, 2640:29, 2640:38, 2645:12, 2660:47, 2688:38, 2700:39, 2706:30, 2710:22,	seventeen [1] -	

2637:26, 2643:35,
2700:43, 2704:32,
2704:33
situations [1] -
2704:27
six [2] - 2620:11,
2634:34
sixteen [1] - 2651:28
skill [2] - 2617:1,
2653:28
skills [1] - 2617:26
skim [3] - 2630:47,
2631:36, 2633:6
skim-read [2] -
2630:47, 2631:36
sliced [1] - 2626:41
slightly [5] - 2610:7,
2651:13, 2654:1,
2672:21, 2698:26
social [19] - 2609:3,
2631:9, 2631:13,
2631:15, 2631:18,
2670:6, 2674:2,
2674:11, 2674:41,
2674:44, 2674:46,
2675:16, 2675:22,
2675:44, 2675:47,
2676:1, 2676:3,
2677:1, 2679:32
society [8] - 2607:28,
2611:4, 2636:29,
2638:33, 2638:35,
2639:13, 2639:26,
2702:27
Solicitor [1] - 2606:33
solved [5] - 2689:14,
2689:15, 2689:18,
2689:19
solved [1] - 2689:8
solving [1] - 2689:11
someone [9] -
2638:29, 2638:40,
2638:42, 2647:23,
2666:36, 2666:40,
2676:7, 2679:4,
2691:22
sometimes [6] -
2623:16, 2628:14,
2630:36, 2637:31,
2663:23, 2695:36
somewhat [6] -
2618:11, 2639:29,
2654:8, 2665:28,
2673:4, 2688:10
somewhere [1] -
2666:11
sorry [48] - 2609:45,
2610:21, 2610:28,
2610:31, 2611:22,
2612:34, 2614:14,
2616:35, 2618:19,
2618:45, 2621:41,
2622:14, 2627:5,
2633:22, 2634:6,
2635:26, 2635:27,
2638:12, 2641:1,
2641:20, 2646:23,
2659:32, 2663:23,
2664:24, 2665:39,
2666:5, 2671:38,
2679:24, 2681:35,
2686:13, 2686:14,
2686:26, 2689:1,
2693:5, 2696:34,
2697:9, 2700:13,
2701:7, 2701:11,
2704:16, 2705:11,
2706:9, 2714:21,
2714:26, 2714:42,
2717:36
sort [54] - 2608:2,
2608:34, 2609:30,
2609:31, 2609:34,
2610:17, 2610:23,
2615:8, 2615:17,
2617:23, 2618:9,
2618:14, 2618:28,
2618:33, 2619:27,
2620:44, 2621:3,
2621:5, 2621:8,
2621:9, 2623:5,
2623:6, 2623:21,
2623:24, 2623:32,
2624:8, 2624:47,
2625:42, 2626:25,
2629:22, 2630:14,
2634:2, 2634:18,
2635:10, 2636:44,
2637:35, 2638:40,
2639:3, 2640:11,
2640:17, 2640:23,
2640:34, 2641:5,
2653:40, 2666:14,
2667:30, 2679:31,
2693:32, 2704:3,
2704:29, 2716:35
sorts [5] - 2610:10,
2610:36, 2619:6,
2621:1
sound [4] - 2625:42,
2625:45, 2628:7,
2635:11
soundly [1] - 2671:29
soundness [1] -
2673:24
sounds [2] - 2611:25,
2700:42
source [7] - 2616:41,
2617:18, 2649:12,
2649:21, 2649:28,
2649:33, 2655:8
South [7] - 2606:21,
2608:25, 2608:31,
2618:35, 2647:43,
2658:43, 2684:6
speaking [4] -
2618:21, 2626:39,
2636:41, 2717:28
SPECIAL [1] - 2718:12
Special [2] - 2606:9,
2714:10
specific [1] - 2662:17
spectacular [2] -
2613:42, 2626:41
speech [1] - 2611:33
spend [2] - 2619:41,
2621:44
spent [4] - 2618:10,
2620:38, 2621:29,
2628:5
spider [1] - 2640:14
split [1] - 2640:11
spontaneously [1] -
2639:29
spring [2] - 2654:15,
2685:6
sprinkled [1] - 2679:8
spur [1] - 2636:20
stable [1] - 2637:36
stage [1] - 2619:24
stand [6] - 2685:46,
2686:22, 2686:24,
2686:30, 2686:42,
2707:17
standard [12] -
2616:18, 2616:19,
2616:20, 2658:28,
2671:40, 2671:46,
2672:4, 2672:5,
2672:8, 2690:23,
2690:25
standards [7] -
2654:11, 2654:12,
2654:14, 2671:36,
2672:2, 2675:38,
2675:42
standing [1] - 2618:4
start [2] - 2664:47,
2708:29
started [1] - 2617:8
starting [1] - 2656:8
state [8] - 2607:23,
2607:44, 2644:44,
2702:14, 2707:44,
2708:3, 2708:10
State [1] - 2608:25
statement [5] -
2611:33, 2621:27,
2625:34, 2691:44,
2715:19
statements [9] -
2651:10, 2657:31,
2667:32, 2691:14,
2695:42, 2696:5,
2696:14, 2696:22,
2696:36
States [3] - 2658:39,
2659:1, 2662:4
station [1] - 2618:42
statistic [1] - 2622:26
status [3] - 2622:22,
2641:17, 2646:2
steadfast [1] -
2615:11
steadfastly [1] -
2629:29
Steer [3] - 2620:30,
2620:33, 2677:6
step [2] - 2629:7,
2703:32
stepping [1] - 2635:21
steps [1] - 2610:39
stereotype [1] -
2609:31
stick [1] - 2615:1
still [14] - 2613:35,
2635:9, 2640:37,
2687:7, 2688:27,
2692:45, 2696:31,
2711:12, 2711:15,
2711:17, 2711:18,
2711:41, 2713:17,
2717:38
stipulated [1] -
2712:20
stop [8] - 2618:19,
2622:39, 2622:42,
2643:32, 2645:43,
2646:6, 2646:10,
2687:8
stopped [2] - 2610:39,
2694:22
stopping [3] -
2638:20, 2666:5,
2713:11
stories [1] - 2621:7
story [2] - 2628:41,
2640:26
straight [1] - 2717:30
straightaway [1] -
2698:21
straightforward [7] -
2643:4, 2643:24,
2644:7, 2644:13,
2646:20, 2647:16,
2647:21
strange [3] - 2627:46,
2628:7, 2704:33
Street [1] - 2606:20
street [1] - 2618:20
stress [3] - 2620:9,
2620:43, 2621:24
stretch [2] - 2623:39,
2704:47
strictly [1] - 2629:42
Strike [6] - 2607:13,
2607:15, 2648:27,
2651:42, 2655:28,
2673:13
strike [3] - 2607:31,
2672:17, 2673:44
strikes [2] - 2632:14,
2634:2
strokes [1] - 2608:2
strong [4] - 2655:35,
2664:14, 2665:9,
2707:13
strongly [1] - 2614:16
struck [1] - 2616:17
structure [1] - 2659:45
structured [1] -
2680:5
struggled [3] -
2634:18, 2655:32
struggling [3] -
2652:17, 2716:6,
2716:8
student [1] - 2623:17
students [2] -
2609:29, 2609:35
studies [1] - 2609:3
study [4] - 2674:14,
2674:23, 2675:12,
2675:33
stuff [13] - 2613:43,
2613:44, 2618:43,
2620:13, 2621:1,
2621:5, 2623:15,
2623:16, 2623:31,
2624:30, 2624:32,
2624:43, 2639:3
stuff [1] - 2619:10
stumps [1] - 2618:44
sub [4] - 2629:37,
2639:47, 2640:3,
2640:8
sub-category [4] -
2629:37, 2639:47,
2640:3, 2640:8
subject [3] - 2610:16,
2635:47, 2640:34
subjective [17] -
2631:10, 2631:12,
2631:25, 2631:44,
2632:5, 2661:7,
2677:34, 2678:29,
2682:20, 2682:33,
2684:21, 2685:10,
2685:16, 2685:20,
2685:38, 2685:39,

- 2687:26
subjectively ^[5] -
 2678:33, 2680:18,
 2680:21, 2685:3,
 2685:14
subjectivity ^[3] -
 2631:20, 2676:16,
 2682:8
subjects ^[1] - 2609:12
submission ^[2] -
 2694:32, 2695:3
submitted ^[3] -
 2650:24, 2660:8,
 2670:45
submitting ^[1] -
 2649:1
subparagraph ^[3] -
 2674:6, 2674:9,
 2690:47
subsequent ^[1] -
 2673:27
subsequently ^[2] -
 2679:37, 2679:38
subset ^[3] - 2705:39,
 2706:25, 2712:39
substantial ^[1] -
 2644:10
substantially ^[1] -
 2654:8
substantive ^[1] -
 2716:35
substitute ^[2] -
 2711:23, 2715:39
subtle ^[2] - 2609:11
succinctly ^[1] -
 2618:25
sudden ^[1] - 2621:15
sufficient ^[7] -
 2658:15, 2665:31,
 2668:32, 2684:40,
 2690:22, 2702:12,
 2715:2
sufficiently ^[1] -
 2709:36
suggest ^[6] - 2642:36,
 2654:44, 2661:17,
 2661:45, 2679:24,
 2688:11
suggested ^[9] -
 2612:16, 2612:23,
 2612:34, 2634:17,
 2641:38, 2651:47,
 2667:21, 2697:23,
 2708:8
suggesting ^[7] -
 2632:37, 2645:14,
 2655:16, 2664:7,
 2685:14, 2711:29,
 2717:6
suggestion ^[4] -
 2614:23, 2694:22,
 2700:19, 2708:18
suggestions ^[1] -
 2608:7
suggests ^[1] - 2661:3
suitable ^[1] - 2630:21
suits ^[1] - 2718:4
summaries ^[3] -
 2616:45, 2629:32,
 2681:29
summarises ^[1] -
 2689:24
summary ^[6] -
 2652:23, 2652:24,
 2671:20, 2672:37,
 2715:6, 2715:14
Superintendent ^[1] -
 2610:43
supply ^[1] - 2681:18
support ^[3] - 2659:25,
 2680:46, 2681:19
supporting ^[1] -
 2644:28
suppose ^[8] - 2649:6,
 2659:46, 2668:32,
 2675:40, 2677:13,
 2679:10, 2680:28,
 2685:17
supposed ^[1] -
 2707:28
supposedly ^[1] -
 2688:10
surely ^[2] - 2627:11,
 2647:5
surprised ^[2] - 2619:3,
 2681:18
surrounding ^[1] -
 2678:4
Surry ^[1] - 2620:39
suspect ^[3] - 2629:26,
 2714:36, 2714:37
suspected ^[6] -
 2617:45, 2709:19,
 2710:14, 2711:5,
 2712:34, 2715:1
Suspected ^[6] -
 2658:8, 2689:39,
 2690:4, 2690:5,
 2709:7, 2710:18
swear ^[1] - 2611:30
sweet ^[1] - 2619:17
sworn ^[1] - 2648:22
Sydney ^[2] - 2606:21,
 2620:37
symbols ^[2] - 2657:34,
 2667:36
sympathetic ^[1] -
 2609:37

T

tab ^[18] - 2641:22,
 2648:31, 2648:34,
 2648:35, 2648:37,
 2652:34, 2655:43,
 2656:1, 2660:13,
 2666:30, 2666:34,
 2666:44, 2670:13,
 2682:9, 2689:22,
 2708:25, 2713:37,
 2715:24
table ^[12] - 2611:20,
 2611:26, 2616:9,
 2616:11, 2626:40,
 2689:24, 2699:33,
 2700:8, 2700:19,
 2705:41, 2706:5,
 2706:31
tabulated ^[1] -
 2706:21
tall ^[1] - 2642:38
Taradale ^[1] - 2636:38
target ^[5] - 2645:10,
 2695:36, 2696:2,
 2703:26, 2703:38
targeted ^[1] - 2618:15
targeting ^[1] - 2704:18
targets ^[1] - 2638:44
task ^[14] - 2615:35,
 2617:33, 2623:39,
 2623:40, 2624:8,
 2625:2, 2625:23,
 2627:4, 2627:32,
 2645:33, 2653:28,
 2654:21, 2664:13,
 2664:18
tasks ^[1] - 2627:32
tattoos ^[1] - 2667:36
taxonomies ^[1] -
 2676:30
taxonomy ^[21] -
 2662:19, 2666:1,
 2666:2, 2666:6,
 2666:14, 2666:19,
 2666:29, 2667:24,
 2667:28, 2667:31,
 2668:1, 2668:25,
 2668:29, 2668:41,
 2668:44, 2668:45,
 2669:1, 2669:2,
 2669:4, 2669:29
teach ^[2] - 2641:14,
 2641:15
teaching ^[5] -
 2623:37, 2628:9,
 2628:15, 2662:7
team ^[20] - 2609:23,
 2613:39, 2616:24,
 2616:40, 2617:13,
 2619:21, 2620:3,
 2621:11, 2642:31,
 2643:6, 2644:5,
 2644:46, 2649:32,
 2655:26, 2656:28,
 2659:11, 2681:39,
 2689:25, 2713:35
team's ^[1] - 2673:25
tease ^[3] - 2680:10,
 2680:22
teasing ^[1] - 2680:25
TEDESCHI ^[77] -
 2607:7, 2607:9,
 2610:4, 2610:31,
 2610:43, 2611:22,
 2611:28, 2611:30,
 2611:36, 2612:16,
 2612:30, 2612:37,
 2613:2, 2613:11,
 2613:18, 2616:5,
 2616:27, 2617:5,
 2619:1, 2622:35,
 2622:42, 2622:46,
 2624:2, 2625:16,
 2626:17, 2627:40,
 2628:33, 2628:45,
 2629:3, 2629:9,
 2629:13, 2630:10,
 2631:34, 2631:38,
 2631:42, 2633:2,
 2633:22, 2633:30,
 2633:39, 2633:44,
 2634:16, 2634:47,
 2637:21, 2637:46,
 2638:12, 2638:18,
 2638:23, 2638:28,
 2642:18, 2642:40,
 2642:46, 2643:38,
 2643:45, 2644:24,
 2644:34, 2645:30,
 2646:13, 2647:38,
 2694:6, 2694:10,
 2694:26, 2694:32,
 2694:37, 2695:3,
 2699:30, 2699:40,
 2699:46, 2700:22,
 2705:26, 2709:30,
 2709:34, 2714:21,
 2714:26, 2717:21,
 2717:27, 2717:36,
 2717:42
Tedeschi ^[34] -
 2606:37, 2611:31,
 2612:27, 2613:5,
 2616:36, 2622:5,
 2622:39, 2623:47,
 2625:14, 2626:15,
 2627:7, 2628:40,
 2633:15, 2634:45,
 2637:16, 2638:3,
 2638:15, 2642:13,
 2642:38, 2643:12,
 2643:42, 2644:32,
 2645:39, 2645:43,
 2647:36, 2694:15,
 2694:41, 2696:19,
 2699:43, 2700:3,
 2705:23, 2709:37,
 2714:24, 2717:46
Tedeschi's ^[1] -
 2700:8
template ^[5] - 2653:1,
 2669:8, 2669:10,
 2679:44, 2679:47
tempted ^[1] - 2670:25
ten ^[1] - 2643:2
ten-point ^[1] - 2643:2
tend ^[3] - 2672:4,
 2679:19, 2705:10
tender ^[19] - 2608:17,
 2608:38, 2611:11,
 2611:16, 2611:40,
 2614:36, 2614:38,
 2622:9, 2622:24,
 2623:21, 2623:29,
 2623:41, 2626:4,
 2626:10, 2626:18,
 2648:38, 2648:46,
 2649:1
tendering ^[1] -
 2623:30
tenders ^[1] - 2622:17
tenor ^[3] - 2615:15,
 2619:26, 2620:23
tentative ^[2] -
 2644:21, 2644:31
tentatively ^[1] -
 2643:35
tenth ^[1] - 2684:13
term ^[16] - 2609:5,
 2614:36, 2620:6,
 2621:24, 2627:44,
 2629:18, 2636:43,
 2640:15, 2652:17,
 2663:27, 2677:6,
 2689:5, 2696:19,
 2715:37, 2716:43,
 2717:7
terminology ^[2] -
 2625:46, 2633:26
terms ^[36] - 2607:44,
 2608:3, 2608:37,
 2608:43, 2609:3,
 2609:11, 2610:2,
 2614:30, 2618:6,
 2618:27, 2619:47,
 2622:23, 2629:30,
 2632:9, 2639:6,
 2639:10, 2642:23,
 2645:37, 2651:42,

- 2655:2, 2675:38,
2677:4, 2678:23,
2679:6, 2679:12,
2679:14, 2681:37,
2706:29, 2706:33,
2709:18, 2716:22,
2716:25, 2716:26,
2716:33, 2717:1
- Terms** [3] - 2648:41,
2650:33, 2650:39
- terrible** [7] - 2620:43,
2624:25, 2624:30,
2635:10, 2639:30,
2641:7, 2647:8
- terribly** [2] - 2681:35,
2686:13
- terrifies** [1] - 2635:22
- terrorism** [2] - 2667:8,
2667:14
- test** [3] - 2631:15,
2631:16, 2675:12
- tested** [1] - 2631:6
- testified** [1] - 2699:33
- testing** [1] - 2677:4
- tether** [1] - 2632:12
- text** [12] - 2642:35,
2644:5, 2651:33,
2651:36, 2651:39,
2652:26, 2653:2,
2653:21, 2653:45,
2653:46, 2654:2,
2663:14
- thankfully** [1] -
2638:46
- that'** [1] - 2627:3
- theme** [2] - 2616:38,
2622:6
- themselves** [4] -
2637:29, 2637:41,
2641:12, 2663:11
- theoretical** [1] -
2664:25
- theoretically** [1] -
2693:1
- thereabouts** [1] -
2613:6
- thereafter** [2] -
2693:33, 2696:21
- therefore** [4] -
2640:33, 2678:19,
2681:16, 2712:13
- they've** [1] - 2679:39
- thinking** [9] - 2615:44,
2617:10, 2621:35,
2631:2, 2637:13,
2637:35, 2665:29,
2708:13, 2712:30
- thinks** [9] - 2635:32,
2635:39, 2703:11,
2706:44, 2706:45,
2707:46, 2713:20,
2716:1
- third** [4] - 2657:34,
2689:46, 2690:46,
2715:32
- thorough** [2] - 2623:9,
2623:15
- thoughts** [1] - 2636:35
- thousands** [1] -
2628:6
- thread** [2] - 2625:19,
2676:41
- threat** [6] - 2636:29,
2636:44, 2638:32,
2638:35, 2639:12,
2639:26
- threatened** [1] -
2637:38
- three** [17] - 2615:27,
2617:2, 2643:6,
2649:42, 2650:18,
2651:1, 2651:23,
2652:7, 2672:44,
2689:29, 2695:11,
2695:16, 2698:25,
2708:38, 2709:3,
2709:16, 2709:43
- three-point** [1] -
2643:6
- threshold** [1] - 2692:3
- throughout** [2] -
2653:2, 2654:14
- throwaway** [1] -
2625:1
- Thursday** [1] -
2606:25
- tick** [1] - 2665:25
- tip** [5] - 2665:21,
2665:22, 2665:24,
2665:31, 2665:32
- title** [2] - 2619:8,
2619:16
- TO** [1] - 2718:13
- today** [2] - 2642:36,
2705:20
- together** [9] - 2607:11,
2615:3, 2623:24,
2627:4, 2628:40,
2649:28, 2677:22,
2686:38, 2706:6
- toilet** [2] - 2608:46,
2714:2
- tolerance** [1] -
2640:30
- toll** [1] - 2627:35
- tomorrow** [1] -
2717:16
- tone** [5] - 2618:6,
2619:1, 2619:2,
2620:1, 2633:19
- Tonks** [2] - 2624:29,
2710:8
- took** [6] - 2615:4,
2615:6, 2615:8,
2620:42, 2655:23,
2687:11
- tool** [41] - 2629:16,
2629:28, 2630:45,
2631:19, 2632:38,
2634:47, 2635:15,
2635:29, 2635:38,
2635:43, 2641:41,
2642:32, 2642:35,
2643:21, 2644:6,
2644:47, 2645:15,
2645:17, 2645:18,
2646:34, 2646:37,
2660:5, 2673:30,
2673:39, 2673:41,
2673:44, 2676:1,
2676:3, 2678:24,
2678:26, 2678:27,
2680:24, 2680:28,
2683:39, 2683:47,
2687:40, 2687:46,
2688:10, 2688:13,
2711:32, 2711:40
- tools** [5] - 2629:34,
2630:11, 2631:14,
2686:1, 2686:7
- tools"** [1] - 2682:12
- top** [22] - 2613:6,
2642:10, 2642:16,
2642:24, 2643:15,
2643:27, 2643:43,
2643:45, 2644:16,
2644:38, 2645:22,
2645:26, 2645:30,
2645:31, 2646:14,
2646:40, 2658:37,
2683:36, 2690:30,
2700:32, 2716:44
- topic** [5] - 2628:9,
2641:20, 2712:17,
2713:11, 2713:12
- topics** [1] - 2631:10
- total** [1] - 2706:17
- totality** [1] - 2607:44
- touch** [2] - 2637:33,
2637:34
- tourism** [3] - 2611:46,
2612:9, 2630:26
- towards** [8] - 2609:9,
2612:17, 2654:13,
2656:15, 2656:47,
2658:37, 2691:25,
2707:46
- trace** [1] - 2691:31
- track** [2] - 2618:40,
2715:21
- trans** [6] - 2609:37,
2609:41, 2609:42,
2610:4, 2610:6,
2610:7
- transcript** [7] -
2612:44, 2613:2,
2633:32, 2633:33,
2638:6, 2693:39,
2693:42
- transposed** [1] -
2616:43
- trap** [2] - 2679:27,
2679:31
- trauma** [1] - 2641:7
- treated** [2] - 2618:16,
2639:38
- treatment** [1] -
2609:14
- trepidation** [3] -
2618:27, 2625:24,
2626:33
- trial** [2] - 2634:26,
2634:29
- tricky** [1] - 2611:2
- tried** [3] - 2618:34,
2663:27, 2704:46
- triggered** [2] -
2637:33, 2638:42
- true** [6] - 2613:37,
2613:40, 2619:11,
2623:7, 2625:34,
2681:11
- truth** [2] - 2618:13,
2647:17
- truthful** [2] - 2626:2,
2626:9
- try** [6] - 2607:20,
2619:5, 2619:8,
2626:8, 2690:25,
2708:43
- trying** [27] - 2607:25,
2608:47, 2616:11,
2617:37, 2618:34,
2622:3, 2623:10,
2624:34, 2624:36,
2630:25, 2634:19,
2639:11, 2640:21,
2645:40, 2662:15,
2665:15, 2667:34,
2685:41, 2685:45,
2690:22, 2693:8,
2696:30, 2696:35,
2708:12, 2709:39,
2711:1, 2712:13
- Tulsi** [2] - 2622:12,
2622:15
- turn** [14] - 2624:37,
2626:30, 2652:33,
2656:12, 2657:18,
2670:12, 2671:22,
2682:9, 2686:46,
2689:23, 2702:20,
2702:22, 2708:25
- turned** [1] - 2616:44
- turns** [2] - 2632:45,
2635:40
- twice** [1] - 2635:33
- two** [26] - 2613:32,
2617:1, 2622:7,
2625:22, 2626:38,
2628:24, 2628:47,
2635:45, 2649:6,
2649:42, 2651:1,
2651:23, 2654:17,
2656:26, 2656:31,
2659:19, 2660:9,
2670:40, 2673:23,
2685:46, 2686:22,
2687:1, 2687:8,
2688:4, 2689:29,
2711:29
- type** [6] - 2635:24,
2668:33, 2668:35,
2669:13, 2675:41
- types** [8] - 2626:38,
2635:23, 2639:36,
2667:10, 2668:30,
2669:6, 2669:30
- typically** [2] - 2636:47,
2637:37
- typologies** [1] -
2669:34
- typology** [1] - 2676:40
- Tyson** [9] - 2607:11,
2615:27, 2625:30,
2625:40, 2629:17,
2648:47, 2650:21,
2655:27, 2708:33

U

- ultimately** [4] -
2646:2, 2646:8,
2677:18, 2694:47
- unattainable** [2] -
2664:32, 2664:36
- unaware** [1] - 2628:25
- uncertain** [5] -
2672:47, 2673:3,
2673:4, 2673:7
- unclear** [1] - 2639:42
- uncomfortable** [1] -
2716:18
- under** [10] - 2611:4,
2619:22, 2641:17,
2658:2, 2682:11,
2685:47, 2687:37,
2702:22, 2710:28,
2712:38
- underestimated** [1] -

- 2621:46
undergoing [1] - 2676:9
underlying [2] - 2637:15, 2661:34
underplay [1] - 2643:23
underquote [2] - 2624:3, 2624:4
underquoted [1] - 2621:46
understood [10] - 2607:14, 2607:16, 2625:39, 2627:12, 2632:41, 2633:10, 2657:22, 2681:32, 2696:39, 2707:27
undeserving [1] - 2641:3
undoubted [1] - 2638:14
unfair [3] - 2634:2, 2634:11, 2634:33
unfortunately [2] - 2642:34, 2706:40
unhelpful [1] - 2687:13
unhelpfully [1] - 2658:2
unique [1] - 2617:46
Unit [1] - 2658:43
United [3] - 2658:39, 2658:47, 2662:3
universally [1] - 2630:45
universe [1] - 2677:8
universality [7] - 2610:35, 2622:11, 2623:30, 2626:44, 2627:43, 2630:31, 2654:46
University [3] - 2609:28, 2613:39, 2622:15
unless [6] - 2611:32, 2637:6, 2654:18, 2692:39, 2708:4, 2708:20
unlikely [2] - 2637:4, 2637:5
unnecessarily [1] - 2612:27
unreliable [2] - 2712:4, 2712:14
unverifiable [1] - 2675:33
up [40] - 2608:23, 2616:38, 2618:29, 2618:44, 2619:35, 2620:11, 2622:5, 2625:19, 2629:46, 2630:3, 2631:4, 2634:3, 2634:13, 2634:33, 2635:9, 2635:12, 2637:1, 2637:10, 2638:39, 2643:19, 2645:44, 2646:8, 2656:36, 2660:3, 2665:18, 2688:28, 2690:30, 2693:47, 2703:8, 2704:34, 2706:12, 2706:39, 2707:9, 2711:9, 2713:30, 2715:20, 2715:36, 2716:4, 2716:43
upset [2] - 2621:16, 2621:22
upsetting [1] - 2610:9
upshot [1] - 2659:40
useable [1] - 2669:43
usefulness [1] - 2684:46
user [2] - 2678:25, 2678:27
utterances [6] - 2691:14, 2695:42, 2696:5, 2696:14, 2696:21, 2696:36
uttered [1] - 2697:10
-
- V**
-
- vague** [2] - 2650:19, 2712:46
validity [12] - 2672:19, 2672:30, 2672:31, 2672:35, 2673:25, 2674:25, 2674:33, 2674:35, 2674:36, 2675:37, 2676:2, 2677:4
valuable [2] - 2680:7, 2681:33
value [5] - 2678:41, 2679:40, 2680:11, 2680:23, 2680:27
values [1] - 2662:18
vantage [1] - 2675:47
various [20] - 2608:30, 2639:29, 2645:44, 2652:26, 2656:42, 2656:43, 2660:21, 2664:45, 2665:34, 2666:8, 2668:34, 2671:2, 2671:7, 2677:12, 2677:13, 2677:30, 2677:43, 2705:19
varying [4] - 2641:41, 2654:11, 2654:12, 2654:13
verbiage [1] - 2663:3
verge [1] - 2716:2
verifiable [1] - 2632:13
version [4] - 2609:6, 2639:28, 2683:39, 2687:36
versus [2] - 2620:33, 2711:6
victim [18] - 2631:46, 2632:8, 2632:14, 2632:17, 2632:22, 2632:39, 2635:17, 2639:17, 2639:20, 2641:3, 2706:44, 2708:8, 2712:47, 2713:2, 2714:47, 2715:5, 2715:12, 2716:17
victim/witness [1] - 2667:38
victimhood [1] - 2641:17
victims [3] - 2635:2, 2636:11, 2639:20
Victorian [1] - 2618:31
view [39] - 2607:35, 2607:43, 2608:43, 2611:39, 2613:37, 2614:45, 2625:38, 2632:22, 2639:3, 2642:34, 2642:38, 2643:26, 2643:28, 2643:35, 2644:21, 2644:31, 2655:27, 2664:10, 2664:32, 2664:45, 2665:5, 2665:8, 2665:11, 2665:42, 2671:28, 2673:40, 2673:42, 2674:21, 2675:1, 2677:34, 2678:21, 2678:31, 2678:33, 2678:34, 2685:5, 2686:21, 2709:15, 2712:9, 2714:31
viewed [1] - 2609:17
views [5] - 2671:22, 2672:37, 2688:32, 2709:14, 2709:26
vile [1] - 2640:45
violence [20] - 2609:11, 2609:42, 2609:43, 2610:5, 2610:6, 2610:7, 2624:27, 2624:31, 2640:27, 2640:34, 2684:13, 2691:14, 2693:23, 2695:41, 2696:5, 2696:14, 2696:21, 2696:36, 2697:14, 2712:1
violent [1] - 2716:10
visiting [1] - 2620:44
volume [13] - 2617:21, 2624:45, 2628:8, 2641:22, 2648:30, 2652:33, 2660:12, 2670:11, 2682:8, 2708:25, 2713:37, 2715:24
volumes [1] - 2652:7
voluminous [1] - 2655:12
volunteer [1] - 2611:8
vulnerable [6] - 2642:4, 2690:40, 2703:15, 2703:26, 2703:40, 2704:23
-
- W**
-
- wait** [1] - 2611:31
Wales [4] - 2606:21, 2608:25, 2658:43, 2684:6
wants [1] - 2694:23
wasting [2] - 2612:26, 2618:37
water [1] - 2638:45
ways [1] - 2650:35
week [1] - 2610:36
weeks [1] - 2670:46
weigh [1] - 2645:44
weighed [2] - 2660:29, 2687:2
weighing [2] - 2646:8, 2684:39
weight [1] - 2625:1
weird [5] - 2618:10, 2618:12, 2622:26, 2624:37, 2637:32
weird [1] - 2622:28
weirdest [1] - 2629:27
whereas [3] - 2629:25, 2636:46, 2698:35
whilst [1] - 2661:21
whim [1] - 2632:16
Whoa [1] - 2610:40
whole [20] - 2613:46, 2623:14, 2670:24, 2670:25, 2670:27, 2670:42, 2680:1, 2698:29, 2698:30, 2698:32, 2698:36, 2698:45, 2700:27, 2702:8, 2702:12, 2702:28, 2702:31, 2702:34, 2713:31, 2717:2
wholly [3] - 2658:22, 2702:43, 2703:8
wide [1] - 2661:22
widely [3] - 2661:22, 2661:29, 2661:40
wider [5] - 2607:19, 2608:29, 2695:37, 2716:20, 2716:24
WILLEM [1] - 2648:22
Willem [3] - 2625:30, 2648:16, 2683:15
wisdom [1] - 2634:20
wish [10] - 2612:45, 2613:16, 2632:17, 2637:42, 2647:43, 2651:7, 2651:26, 2686:22, 2718:2, 2718:3
wishes [1] - 2644:20
wishing [1] - 2675:43
withdraw [3] - 2611:22, 2612:30, 2685:36
WITHDREW [1] - 2647:46
witness [12] - 2607:2, 2613:14, 2633:16, 2642:40, 2643:19, 2645:36, 2645:41, 2648:2, 2648:16, 2668:17, 2694:10, 2699:44
WITNESS [5] - 2647:46, 2666:32, 2666:38, 2709:39, 2718:7
witnesses [1] - 2651:9
Wolfenden [2] - 2609:4, 2609:6
wonderful [6] - 2613:43, 2626:40, 2626:42, 2630:32, 2631:5, 2640:31
wondering [3] - 2629:28, 2631:5, 2715:36
woods [1] - 2681:36
word [11] - 2609:46, 2617:19, 2621:9, 2640:33, 2664:14, 2673:7, 2685:39, 2686:38, 2716:5, 2717:8, 2717:21
words [21] - 2619:25, 2623:25, 2628:34, 2631:25, 2633:14, 2637:19, 2642:47, 2646:18, 2652:21,

2655:1, 2659:28,
 2663:31, 2663:42,
 2678:25, 2679:1,
 2682:41, 2683:6,
 2685:21, 2687:28,
 2693:31, 2694:38
workers [1] - 2711:29
world [3] - 2626:38,
 2626:42, 2630:21
worries [1] - 2640:23
worse [3] - 2624:45,
 2640:18, 2643:29
worth [2] - 2640:10,
 2661:21
worthy [1] - 2677:15
wow [1] - 2620:35
write [2] - 2619:41,
 2622:16
writes [1] - 2715:47
writings [2] - 2612:5,
 2612:7
written [10] - 2613:31,
 2614:1, 2634:4,
 2646:44, 2651:1,
 2651:4, 2653:16,
 2657:30, 2667:32,
 2683:15
wrongly [3] - 2706:46,
 2707:31, 2708:9
wrote [6] - 2641:21,
 2646:46, 2646:47,
 2671:6, 2683:27,
 2686:38

Y

year [3] - 2619:41,
 2650:23, 2715:13
years [7] - 2618:31,
 2618:35, 2620:11,
 2623:38, 2634:34,
 2715:6
yes/No [1] - 2658:7
yesterday [19] -
 2608:8, 2612:18,
 2613:21, 2614:47,
 2616:17, 2617:34,
 2620:4, 2632:32,
 2633:17, 2634:10,
 2634:39, 2635:20,
 2636:35, 2638:32,
 2640:22, 2642:9,
 2642:24, 2642:36,
 2645:37
young [1] - 2704:36
younger [2] - 2637:29,
 2637:37
yourself [15] -
 2610:18, 2619:44,
 2622:27, 2627:1,