

INQUIRY INTO CERTAIN AUSTRALIAN COMPANIES IN RELATION TO
THE UN OIL-FOR-FOOD PROGRAMME

Before The Hon TRH Cole AO RFD QC

Held at Court 2, Level 5,
55 Market Street, Sydney

On Friday, 27 January 2006, at 10.30am

1 MR BARKER: I understand that your Honour has given leave
2 for counsel to appear for this witness. If I need to seek
3 it, I do so.

4
5 THE COMMISSIONER: Yes, Mr Barker.

6
7 MR WIGNEY: I firstly apologise for the short delay in
8 commencing this morning. I already apologised to my
9 learned friend Mr Barker for delaying him as well.

10
11 Commissioner, in senior counsel's opening statement on
12 16 January of this year senior counsel opened at some
13 length about Alkaloids of Australia Pty Limited, and I
14 don't propose to repeat what senior counsel said in his
15 opening statement in length before you this morning, but
16 can I remind you in the briefest possible terms of some of
17 the dates and figures that senior counsel referred to in
18 that opening statement.

19
20 Firstly, Commissioner, in the final report of the
21 Independent Inquiry Committee of the United Nations the
22 only mention made of Alkaloids of Australia Pty Limited is
23 in tables 6, 7 and 8 annexed to that final report. In
24 table 6 annexed to the final report there is reference to
25 one contract by Alkaloids of Australia Pty Limited for the
26 sale of hyoscine-N-butyl bromide, with a contract face value
27 of US\$836,252 and there is referred to a figure of
28 US\$923,867 for contract disbursements.

29
30 Table 7 annexed to the final report of the IIC repeats
31 that information about the contract face value in United
32 States dollars and refers to ASSF, or aftersales service
33 fees, levied of US\$76,023 and paid ASSF, that's aftersales
34 service fees, of US\$83,988. It is noted in that table that
35 the company - that is, Alkaloids of Australia Pty
36 Limited - denies that it made payments in violation of the
37 Oil-for-Food Program.

38
39 Table 8 repeats that information and again contains
40 the figures to which I've just referred relating to ASSF,
41 or aftersales service fees, and notes that those figures
42 are projected figures and based on Government of Iraq
43 policy documents.

44
45 Commissioner, can I just say this very briefly in
46 opening before we call evidence this morning, that there
47 will be evidence before you that there was in fact a

1 contract entered into between Alkaloids of Australia Pty
2 Limited and the State Company for Manufacturing Drugs and
3 Medical Appliances, dated 19 July 2001, for the supply of
4 1,000 kilograms of hyoscyne-N-butylbromide. The contract
5 price as stated in that contract was 955,000 Euros.
6 Commissioner, I anticipate that there will be evidence
7 before you from which it can be inferred that 10 per cent
8 of that contract sum - that's 955,000 Euros - was in due
9 course paid to the Iraqi Government, and the inference
10 available is that it was pursuant to the Iraqi Government's
11 policy of levying aftersales service fees of 10 per cent on
12 suppliers under the Oil-for-Food Program from a period of a
13 point in time.

14
15 The evidence, we anticipate, will suggest, or will
16 provide a basis for inferring, that a figure approaching
17 90,000 Euros was added to the contract price and, in due
18 course, sometime after the contract was entered into, paid
19 to the Iraqi Government. At the then current exchange
20 rates between the Euro and the US dollar, that approximates
21 to US\$80,000 - that is, close to the figure referred to in
22 the tables to the final report of the IIC.

23
24 It's anticipated, Mr Commissioner, that the evidence
25 before you will establish or provide a basis for inferring
26 that this sum of money, approximating US\$80,000, or 90,000
27 Euros, was paid to the Iraqi Government or entities
28 controlled by it by an agent that had been retained by
29 Alkaloids of Australia Pty Limited, a gentleman named
30 Mr Albert Shimon. The evidence will provide a basis for
31 inferring that that payment was made out of a very large
32 commission payment that was subsequently paid to Mr Shimon
33 by or on behalf of Alkaloids of Australia Pty Limited.

34
35 The primary issue for consideration by the inquiry
36 will be the knowledge of Alkaloids of Australia and its
37 officers, employees or agents about those payments to which
38 I have referred.

39
40 Commissioner, the witness who will be giving evidence
41 today is Mr Chris Joyce. I will call him in a moment. If
42 I can firstly, please, just tender two statutory
43 declarations that have been provided by other witnesses
44 that bear on the facts for consideration today relating to
45 Alkaloids of Australia. The first of those statutory
46 declarations is a statutory declaration of Matthew Ward
47 sworn on 25 January 2006. As you will hear, Commissioner,

1 Mr Ward was an employee of Mr Joyce's company, and his name
2 will be referred to in the documents and other evidence
3 this morning. I tender that document. I should indicate
4 at this stage it is a photocopy or a facsimile copy. The
5 original will replace it in due course.

6

7 EXHIBIT #64 STATUTORY DECLARATION OF MATTHEW WARD,
8 SWORN 25/1/2006

9

10 MR WIGNEY: The second statutory declaration is a statutory
11 declaration of John Norman Crumpton. It is declared on
12 19 January 2006. As you will hear, Commissioner,
13 Mr Crumpton is one of the directors of Alkaloids of
14 Australia Pty Limited.

15

16 EXHIBIT #65 STATUTORY DECLARATION OF JOHN NORMAN CRUMPTON
17 DECLARED ON 19/1/2006

18

19 MR WIGNEY: Can I indicate at this stage it's not proposed
20 to call either of those witnesses to give oral evidence,
21 although that position may change. At this stage it's not
22 proposed to call them. I now call Mr Chris Joyce.

23

24 <CHRISTOPHER KENNETH JOYCE, affirmed: [10.40am]

25

26 <EXAMINATION BY MR WIGNEY:

27

28 MR WIGNEY: Q. Mr Joyce, is your full name Christopher
29 Kenneth Joyce?

30

31 A. Yes.

32

33 Q. You reside at an address in Potts Point?

34

35 A. Yes.

36

37 Q. What's your current occupation?

38

39 A. Farmer and merchant.

40

41 Q. I think you have made or declared three statutory

42

43 declarations for the purposes of this inquiry; is that so?
44 A. Yes.

45

46 Q. I will take you to them one at a time. The first of
47 those that I will take you to is one that is undated, but I
understand was signed or declared by you on 11 January of
2006; is that correct? Perhaps if I provide you with the
document.

48

49 A. I'm just not sure about the date. There were

1 certainly three statements, but I thought I did one in
2 December and one last week and one today.

3

4 Q. I'll provide it to you.

5 A. Yes, that's the first statement. Yes, that's correct.

6

7 Q. That statement, the first page of which is barcoded
8 AOA.0007.0003 --

9 A. Yes.

10

11 Q. -- are you able to recall when you made that
12 statement?

13 A. I thought it was earlier in January than the 11th, but
14 it's probably the 11th.

15

16 Q. It's 19 pages --

17 A. Yes.

18

19 Q. -- and annexes a number of annexures.

20 A. Yes.

21

22 MR WIGNEY: I tender that, please.

23

24 EXHIBIT #66 FIRST STATEMENT OF MR CHRISTOPHER JOYCE,
25 DECLARED ON 11/1/2006, BARCODED AOA.0007.0003

26

27 MR WIGNEY: Q. If I can secondly show you a statement,
28 it bears the date 19 January 2006, do you identify that as
29 a two-page statement that you signed on 19 January 2006?

30 A. Yes.

31

32 Q. It also contains a number of - I think four or five -
33 annexures; is that so?

34 A. Yes.

35

36 MR WIGNEY: I tender that.

37

38 EXHIBIT #67 SECOND STATEMENT OF MR CHRISTOPHER JOYCE,
39 DECLARED ON 19/1/2006

40

41 MR WIGNEY: Q. Finally, Mr Joyce, if I can show you a
42 copy of another document.

43 A. Yes.

44

45 Q. Do you identify that as a statement that you have
46 signed I think this morning in relation to this.

47 A. Yes.

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MR WIGNEY: Again, it is a seven-page document with a number of annexures. I tender that.

EXHIBIT #68 THIRD STATEMENT OF MR CHRISTOPHER JOYCE,
DECLARED ON 27/1/2006

THE COMMISSIONER: I don't think I've seen that.

MR WIGNEY: Commissioner, it came in fairly late this morning, it was provided to me my learned friend. I have to say I have not read it either. It may be the case that I will need someone today to read it and consider its contents. I'm reminded that perhaps I should, at least at this stage, tender it as a confidential exhibit, for this reason, that it refers to and annexes some emails with officers or investigators retained by the independent inquiry. Commissioner, I understand that those names ought to be kept confidential. I will tender it on a confidential basis at the moment.

THE COMMISSIONER: At this stage I'll mark it as exhibit 68, but I will make a direction pursuant to the Act that the names of the United Nations investigators are not to be published.

MR WIGNEY: Before I commence further questioning of Mr Joyce, can I also tender a volume of documents that has been compiled from documents produced to the inquiry by Alkaloids of Australia Pty Limited through Mr Joyce. I've provided a copy of this bundle to my learned friend Mr Barker. The documents within it will be the subject of questioning today. It's tendered in this form as a matter of convenience.

THE COMMISSIONER: Is that the volume that commences with AOA.0001.0714 and concludes with AOA.0001.0007?

MR WIGNEY: That's so, Commissioner. Having taken you to those last two documents, I should indicate that those last two documents also should be, at this stage, tendered on a confidential basis, for the same reason as I have just referred.

THE COMMISSIONER: Very well. The volume will be exhibit 69.

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EXHIBIT #69 VOLUME OF DOCUMENTS BARCODED
AOA.0001.0714-AOA.001.0007

THE COMMISSIONER: The last two documents, AOA.0001.0005
to 0007 will be marked as confidential exhibit 92.

EXHIBIT #92C LAST TWO DOCUMENTS FROM VOLUME COMPRISING
EXHIBIT 69, BARCODED AOA.0001.0005-0007

MR WIGNEY: Q. Mr Joyce, you described your current
occupation as farmer and merchant earlier. Is it the
position that you are a director of a company called
Australian Pioneer Pistachio Company Pty Limited?

A. Yes.

Q. You are in fact a director of a number of other
companies, but, for present purposes --

A. Yes.

Q. Your statements, and the annexures to them, contain
some considerable detail about your involvement with
Alkaloids of Australia Pty Limited. Can I endeavour,
please, to get from you in a nutshell, as it were, if you'd
pardon the pun, your connection with Alkaloids. Firstly,
the directors of the company Alkaloids of Australia Pty
Limited that entered into the contract that is the subject
of this inquiry are, firstly, Colin Robert Crumpton; is
that correct?

A. The directors of the company?

Q. Yes.

A. Yes, that includes, yes.

Q. Glyn Norman Crumpton; correct?

A. Yes.

Q. John Norman Crumpton --

A. Yes.

Q. -- and Olga Teresa Crumpton; is that so?

A. Yes.

Q. Were they also directors of the company back in 2001
when the relevant events to which we'll come occurred?

A. Yes.

1 Q. Are those members of the Crompton family all residents
2 of Kingaroy and I think it's Boobie in Queensland?
3 A. Yes.
4
5 Q. And the principal place of business of that company -
6 that is, Alkaloids of Australia Pty Limited - is in
7 Kingaroy; is that right?
8 A. That's correct.
9
10 Q. The business of that company is growing a plant called
11 duboisia; is that correct?
12 A. Yes - well, what you've said is not correct. The
13 plant is duboisia, but the company I do not believe is
14 involved in the growing of the duboisia, it's involved in
15 the processing of the duboisia.
16
17 Q. I see. And duboisia, when processed, produces a
18 pharmaceutical product that is called hyoscine; is that
19 right?
20 A. Correct.
21
22 Q. "Hyoscine" being the short-form name for it?
23 A. It's the generic name, yes. It has a number of forms
24 and various other names it can be known as, but generally
25 it's known as hyoscine.
26
27 Q. In short form, it was that product - that's hyoscine -
28 that, to your knowledge, was the product that was sold to
29 the Iraqi entity under the Oil-for-Food Program; is that
30 right?
31 A. Yes, that's correct.
32
33 Q. You have yourself never been a director or officer of
34 that particular company, Alkaloids of Australia Pty
35 Limited; is that right?
36 A. That is correct.
37
38 Q. I think there is, in addition to that company
39 Alkaloids, another company called Alkaloids that is
40 incorporated in New South Wales that relevantly has nothing
41 to do with these matters; is that right?
42 A. That is correct.
43
44 Q. You personally have had a very long association with
45 the Crompton family and Alkaloids of Australia Pty Limited;
46 is that right?
47 A. Yes.

1
2 Q. You initially marketed and sold, amongst other things,
3 peanuts that were produced by the Crumpton family and that
4 company?
5 A. That is correct.
6
7 Q. You did so under a company called Nut Trading
8 Australia Pty Limited, of which you were managing director?
9 A. That's correct.
10
11 Q. That relationship goes as far back as 1975; is that
12 right?
13 A. That is correct.
14
15 Q. When Alkaloids of Australia began processing or
16 producing hyoscine, firstly, did that occur in about the
17 late 1980s?
18 A. Yes.
19
20 Q. Did you at that time begin to market and sell that
21 product - that's hyoscine - on behalf of the Crumpton
22 family and Alkaloids of Australia?
23 A. Yes.
24
25 Q. Through what company did you carry out those marketing
26 and sales services?
27 A. I think by that stage the trading company had changed
28 its name to Jorgenson Waring Foods Pty Limited.
29
30 Q. That was a business that was relevantly controlled by
31 a company called Joe White Maltings Pty Limited; is that
32 right?
33 A. That's correct.
34
35 Q. You were a director of Joe White Maltings Pty Limited?
36 A. Yes.
37
38 Q. As I understand it, whilst you are a director, you
39 were not involved, at least at that stage, in the
40 day-to-day business of that company?
41 A. In the late 80s and early 90s I was an executive of
42 the company, but by the mid-90s I was solely an external
43 director of Joe White Maltings Pty Limited.
44
45 Q. To your knowledge, did that company, or the business
46 that it ran, continue to market and sell hyoscine on behalf
47 of Alkaloids of Australia up until --

1 A. Yes, it did.
2
3 Q. -- the year 2000?
4 A. That's correct.
5
6 Q. Did your day-to-day involvement with Alkaloids of
7 Australia revive in about the year 2000?
8 A. Yes.
9
10 Q. Were you approached by a member of the Crumpton family
11 and asked if you, again, would market and sell their
12 product - that's hyoscine - on their behalf?
13 A. Yes.
14
15 Q. On this occasion did you do so through your company -
16 that's Australian Pioneer Pistachio Company?
17 A. Yes.
18
19 Q. We'll call that APPC for short.
20 A. Yes.
21
22 Q. We're now in the year 2000. Were the terms of APPC's
23 retainer as Alkaloids of Australia's agent, reduced to
24 writing?
25 A. No.
26
27 Q. There was no agency agreement or other document
28 setting out the terms of the commercial relationship
29 between APPC and Alkaloids?
30 A. There was an agreement, but it wasn't reduced to
31 writing.
32
33 Q. Again, was the agreement, in short, that APPC would
34 handle all aspects of the marketing and sales of the
35 product hyoscine produced by Alkaloids?
36 A. Yes.
37
38 Q. Did that include the promotion of the product, its
39 negotiation, or negotiation of sales, retaining other
40 agents and all aspects of invoicing, and the like, in
41 relation to the sales of that product?
42 A. That's correct.
43
44 Q. In short, you or your company pretty much did
45 everything on behalf of Alkaloids of Australia in relation
46 to the marketing and sales of the product hyoscine; is that
47 right?

1 A. That is correct.
2
3 Q. Is it your evidence that the directors, the members of
4 the Crumpton family, had virtually no involvement at all in
5 relation to those matters; that is, marketing and sales of
6 that product?
7 A. They were kept generally informed of what was
8 happening, general market trends and prices, but on a
9 day-to-day basis they were not involved in any transactions
10 at all.
11
12 Q. Again, dealing with the terms of your or APPC's
13 retainer by Alkaloids, was it agreed that you would be paid
14 a 2 per cent flat commission on all sales of the hyoscine
15 product?
16 A. Yes.
17
18 Q. And you, or APPC, would also receive a monthly
19 marketing fee?
20 A. That's correct.
21
22 Q. How much was that marketing fee?
23 A. I think it's \$9,500 per month.
24
25 Q. Now, during at least the period late 2000 to 2001, did
26 APPC employ a gentleman by the name of Matthew Ward?
27 A. He was employed before we took the Alkaloids account,
28 so I - he would have been employed from late 1999 or early
29 2000.
30
31 Q. Is it your evidence that he ceased employment sometime
32 towards the end of 2001?
33 A. Yes.
34
35 Q. Did he assist you in relation to sales and marketing,
36 including sales and marketing of the product hyoscine --
37 A. Yes, he did.
38
39 Q. -- when that came to be part of APPC's brief?
40 A. Yes, he did.
41
42 Q. Just dealing with the employees of APPC, were there at
43 various times some administrative assistants that also
44 helped?
45 A. Yes, there was.
46
47 Q. Mr Joyce, as I said, you've described yourself as,

1 amongst other things, a merchant. Would you agree that you
2 are an extremely experienced trader or salesman - I don't
3 use that in a derogatory sense - when it comes to nuts and
4 related products?

5 A. That's very nice of you to say, sir, but it's not for
6 me to say that. I've been in the business too long, if
7 that's what you're asking.

8

9 THE COMMISSIONER: Q. Then you became a farmer?

10 A. Correct, an honest farmer, no longer a merchant, sir.

11

12 Q. Do you grow wheat by any chance?

13 A. No - oh, sorry, I do. We've actually just had a very
14 good crop.

15

16 MR WIGNEY: This is strictly a gluten-free day.

17

18 Q. You have been involved in the sale and marketing of
19 nuts and related products for some 20 or 30 years, have you
20 not?

21 A. Yes.

22

23 Q. That includes marketing and selling those products
24 internationally, right?

25 A. Not so much, but some international sales. Most of
26 the nut business has been domestic and importing and
27 distributing domestic products. There has been a small
28 amount of exporting. Exporting has not been the major
29 focus of the nut business, no.

30

31 Q. In relation to hyoscine, we've heard that you have had
32 some involvement in the sales and marketing of that product
33 since some time in the 1980s; is that right?

34 A. Correct.

35

36 Q. That is a product the market for which has been almost
37 exclusively exporting; is that correct?

38 A. That is correct.

39

40 Q. May we take it, sir, you've had coming up to towards
41 20-odd years of experience marketing that product?

42 A. Yes.

43

44 Q. That product, the markets for it largely include Third
45 World countries; would you agree?

46 A. Yes.

47

1 Q. And, in particular, some countries in Asia and the
2 Middle East; is that right?

3 A. Yes.

4

5 Q. Throughout that period of time you have experienced
6 dealing with other traders and agents in those countries;
7 that is, Asia and the Middle East?

8 A. That's correct.

9

10 Q. Putting aside the Alkaloids contract entered into in
11 2001 that we'll come to shortly, have you sold any other
12 products into the Iraqi market?

13 A. Not knowingly.

14

15 Q. I think your reference to "not knowingly" may be a
16 reference to the fact that at one stage Alkaloids' hyosciine
17 product was sold to a Pakistani company; is that right?

18 A. No, I was referring to a sale to Syria, sir, that the
19 Australian Federal Police came and asked us about in 2002,
20 and it was suggested that that shipment that we had sold to
21 Syria had turned up in Iraq.

22

23 Q. I see. Was there also an occasion when the hyosciine
24 product was sold to a Pakistani company?

25 A. There was a form of the hyosciine sold to a Pakistani
26 company, the hydrobromide form, which we understand the
27 Pakistanis converted to the butylbromide form, which was
28 then sold to the Iraqis, yes.

29

30 Q. Putting aside those two matters, the Syria contract
31 and the one that you've just referred to, you have no other
32 experience in selling the product or any product into the
33 Iraqi market, again also --

34 A. None whatsoever of any product.

35

36 Q. You've indicated that the market for the hyosciine
37 product was almost exclusively export markets?

38 A. Yes.

39

40 Q. Is it the position that you, as Alkaloids' agent, in
41 turn, in relation to those export sales, generally retain
42 local agents in the countries to which you are exporting --

43 A. Almost exclusively we used local agents and traders
44 rather than selling directly to pharmaceutical companies in
45 overseas countries.

46

47 Q. Is that, in general terms, because they - that is, the

1 local agents - have contacts and connections and local
2 knowledge that is necessary for you to get the business in
3 those countries?
4 A. Yes, it is also because we're a very small company and
5 it's not possible for us to develop the knowledge and
6 skills of each particular market and the relative - each
7 one of them is a relatively small market, so we could not
8 develop - it would not be economically efficient for us to
9 develop the knowledge and skills that those agents have.
10
11 Q. When you say "we", you're referring to APPC rather
12 than Alkaloids?
13 A. No, I'm not, I'm referring to Alkaloids of Australia.
14 The relationship with the Crumptions is such that I'm not
15 too sure I know the difference between we and them. It's
16 we.
17
18 Q. Putting aside again, for the moment, the Iraqi
19 contract that we will come to specifically in a moment,
20 with the agreements that you, be it APPC or Alkaloids,
21 enter into with the overseas agents, do you endeavour to
22 document the terms of those agencies or retainers?
23 A. Generally not.
24
25 Q. Why is that?
26 A. There's no particular need to do so. There are only
27 certain aspects of it which remain fixed, in the sense of
28 the nature of their market, the terms of the payments and
29 the terms of the commissions. They're relatively simple
30 things and they're generally not formally documented in any
31 single document. They probably exist if you were to read a
32 long, large file of correspondence with that agent, but
33 they're not - there's not a neat agency agreement, no.
34
35 Q. Just dealing with that in a couple of stages, firstly,
36 what about in terms of agreements you enter into with those
37 overseas agents in relation to the commission or other
38 payments that are to be made to that, do you endeavour to
39 document those matters?
40 A. They're documented on a case-by-case basis certainly,
41 because commissions are a variable matter and if there is
42 any variations from the normal, we would usually remark
43 upon it, yes.
44
45 Q. You, as an experienced merchant or trader, endeavour
46 to keep documentary records of your dealings with your
47 overseas agents?

1 A. Well, I think as my search of the files for this
2 inquiry, sir, they're probably not as good as they should
3 be, but, yes, we do endeavour.
4
5 Q. You have a practice of maintaining, I think, day books
6 which keep a daily record of your activities, including
7 contacts with your agents?
8 A. Yes, but as I remarked, not perhaps as efficiently and
9 as thoroughly as represents every single transaction and
10 every conversation I have.
11
12 Q. Certainly, but you would agree that you would
13 endeavour to record in those day books any matters of
14 particular significance or substance in relation to your
15 dealings with overseas agents; would you agree with that?
16 A. Yes.
17
18 Q. Likewise, as an experienced trader, would you
19 endeavour to reduce your agreements as to the payment of
20 commissions specifically with your overseas arrangements
21 into some documentary form?
22 A. Usually.
23
24 Q. Just dealing still in generalities, as it were, before
25 we turn to the Iraqi contract, do you agree that whilst the
26 terms of your agency agreements with overseas agents vary
27 widely, on average the level of commission you would pay to
28 them would be around 5 per cent?
29 A. Yes.
30
31 Q. It is rare for the commission you pay to overseas
32 agents to approach or exceed 15 per cent; would you agree?
33 A. Yes.
34
35 Q. Certainly your commission is 2 per cent; right?
36 A. Correct.
37
38 Q. If we can come now to your involvement with the
39 Alkaloids contract that was entered into with the Iraqi
40 entity in 2001, as I understand it from your detailed
41 statement, your first statement, your first involvement
42 with that contract occurred in about October of 2000; is
43 that right?
44 A. Yes.
45
46 Q. That's when you had a conversation with a Mr Albert
47 Shi moon?

1 A. That's correct.
2
3 Q. In short form, that contact or conversation with
4 Mr Shimoon came about as a result of Mr Ward following up a
5 letter that he had located in the files from Mr Shimoon; is
6 that right?
7 A. Yes.
8
9 Q. He was, in short, chasing up Mr Shimoon to see if he
10 could assist in business of APPC?
11 A. Yes.
12
13 Q. In relation to that discussion you had with Mr Shimoon
14 in October of 2000, did he telephone you or you him?
15 A. I think he telephoned me, but I'm not absolutely
16 certain - no, I'm 99 per cent certain he telephoned me,
17 because I didn't have his phone number, so he must have
18 rung me.
19
20 Q. You, I think, made a note in your day book of that
21 particular conversation; is that right?
22 A. Yes.
23
24 Q. If I may, I'll have a copy of that put up on the
25 screen. I understand that it's not on the system. It may
26 have to go up on the projector. Perhaps I'll just try the
27 number first and see if it comes up on the system -
28 AOA.0002.0085. We'll try our luck. I appreciate it's not
29 a particularly terrific copy and your handwriting, in terms
30 of legibility, is a bit like mine, but does this record the
31 conversation you had with Mr Shimoon on 13 October 2000?
32 A. Yes, it does.
33
34 Q. I just want to direct your attention to a couple of
35 things in it. Firstly, there's a reference, about a third
36 of the way down, to "Director General of Health in Iraq,
37 graduate of Ottawa University and 'good friend' of
38 Shimoon"; do you see that?
39 A. Yes.
40
41 Q. Mr Shimoon was, as it were, giving you a bit of a
42 sales pitch for what he can do for you - that's APPC - in
43 terms of potential contracts with Iraq; is that right?
44 A. Yes.
45
46 Q. Did Mr Shimoon refer in that context to the
47 Oil-for-Food Program?

1 A. I don't think so, except that I think it was
2 understood by me then, or very soon thereafter, that all
3 sales to Iraq were going to be through the UN Oil-for-Food
4 Program.
5
6 Q. Right.
7 A. I can't remember whether it was particularly raised
8 then, but it certainly became very apparent very quickly
9 thereafter that that was the method by which sales would be
10 made into Iraq.
11
12 Q. I see. We'll come back to that file note in a moment,
13 but would you mind going, please, to this document, if it
14 can be brought up on the screen, AOA.0001.0714. Is that
15 the document that was found on a file from Mr Shimon that
16 really launched your discussions with him?
17 A. Yes.
18
19 Q. You'll see in it that it refers to phase VII already
20 having been closed and putting the company on the phase
21 VIII list?
22 A. Yes.
23
24 Q. Did you see this document at about the time that
25 you --
26 A. Yes.
27
28 Q. Did you appreciate they were references to phases under
29 the Oil-for-Food Program?
30 A. Not particularly at that stage as to what that meant,
31 no.
32
33 Q. I see.
34 A. I became aware of that towards the end of 2000. I
35 doubt that I would have understood what phase VIII and
36 phase IX was in May 2000.
37
38 Q. I see. If we can just come back then to the note of
39 your conversation, AOA.0002.0085. We've established that
40 Mr Shimon told you that he was good friends with the
41 director general of health?
42 A. Yes.
43
44 Q. Did you understand, or did he tell you, that the
45 director general of health was, in short, the person who
46 would decide on tenders for the hyoscine product under the
47 Oil-for-Food Program?

1 A. No, he didn't tell me that specifically. At various
2 stages he told me - whether it was on that occasion or on
3 other occasions - that he knew all director generals of
4 everybody in Iraq and he was buddy buddy with them all and
5 they were all the people who made the decisions - the
6 general huff and puff of a good salesman.
7

8 Q. In short, he was giving you a sales pitch and part of
9 the sales pitch was that he was, to use your words, "buddy
10 buddy", or his words, "buddy buddy" with the decision
11 makers; correct?

12 A. Correct.
13

14 Q. That in this case included the director general of
15 health; would you agree?

16 A. Yes.
17

18 Q. Did he suggest that he would be able to exert some
19 influence with those buddies of his in relation to the
20 awarding of contracts under the Oil-for-Food Program?

21 A. I'm not sure I'd use the word "influence". He
22 certainly suggested he had access to those people.
23

24 Q. Did he suggest that he would be able to assist you to
25 get a contract under the next phase of the program at this
26 time, which was phase IX?

27 A. I don't recollect anything about the specific phase,
28 but he certainly suggested he could facilitate obtaining
29 business in Iraq.
30

31 Q. Did he suggest to you that he had knowledge of and
32 could assist you in relation to the requirements of the
33 Oil-for-Food Program; that is --

34 A. Yes. Well, again, I'm not sure he used that term,
35 "Oil-for-Food Program", but he certainly implied that he
36 was conversant with the protocols of doing business with
37 Iraq. As subsequent events turn out, that means the
38 protocols under the Oil-for-Food, but I don't particularly
39 remember it at that time in that initial conversation with
40 him.
41

42 Q. Following this conversation - that's with Mr Shimon
43 in October of 2000 - did you or Mr Ward conduct some
44 research into the Oil-for-Food Program?

45 A. Yes.
46

47 Q. If we could go to the document, please, at

1 AOA.0001.0732, that's the first page of a multiple page
2 document. You're able to identify that as a document that
3 was obtained by either you or Mr Ward sometime in or around
4 January 2001?

5 A. Yes.

6
7 Q. Are you able to recall seeing it at the time?

8 A. Yes, there were a number of documents of that type
9 about the protocols of dealing with Iraq which I recollect
10 reading at that time.

11
12 Q. I just want to take you, please, sir, to a couple of
13 pages of that document, just to prompt your recollection of
14 your knowledge of the program as it stood in 2001. If you
15 could go, please, to the third page of that document, which
16 is at 0734, you'll see at the bottom of that page the last
17 two lines:

18
19 All exports to Iraq from Australia must be
20 granted permission to export by the
21 Minister for Foreign Affairs (or his
22 delegate), who must be satisfied that the
23 export of goods to Iraq will not infringe
24 the international obligations of Australia.

25
26 That's something that you observed and became aware of at
27 the time; is that right?

28 A. Yes, I confess I probably did not go and immediately
29 seek counsel and find out what the international
30 obligations of Australia were. I certainly understood that
31 you needed the approval of the Australian Government to
32 make the export.

33
34 Q. If we can next go, please, to the sixth page of the
35 document, that's 0737. Would you go about two-thirds of
36 the way down the page, you'll see a subheading "Outline of
37 the process required to export to Iraq", and you'll see a
38 number of dot points - do you see that?

39 A. Yes.

40
41 Q. Suggesting or recommending that traders, Australian
42 traders, firstly consult the UN's distribution plan. Did
43 you understand there to be under the Oil-for-Food Program a
44 distribution list of products that were eligible for sales
45 under the program?

46 A. There was a list of products. I don't recollect it
47 being called a distribution plan, but I do recollect that

1 there was a list of products. The term "distribution plan"
2 I'm not sure about.
3
4 Q. In due course you did see a list of products --
5 A. Yes.
6
7 Q. -- which included hyoscine?
8 A. Correct.
9
10 Q. The second dot point, in short form, recommends that
11 you conclude the appropriate contractual arrangements; do
12 you see that?
13 A. Yes.
14
15 Q. If one then goes over the page, to 0738, the next dot
16 point:
17
18 Attach this documentation to a completed UN
19 "Notification or Request to Ship Goods to
20 Iraq" form...
21
22 Do you see that.
23
24 A. Yes.
25
26 Q. In due course you came to learn that the United
27 Nations had to approve contracts under the Oil-for-Food
28 Program?
29 A. Yes.
30
31 Q. And that that entailed, amongst other things,
32 completing a form and sending it to the United Nations via
33 the Department of Foreign Affairs and Trade; right?
34 A. Yes.
35
36 Q. You'll see that in the next dot point:
37
38 Return the form to the Iraq Desk Officer,
39 Middle East Section, Department of Foreign
40 Affairs and Trade...
41
42 Right?
43 A. Yes.
44
45 Q. They were some aspects of the Oil-for-Food Program
46 about which you became aware in the course of 2001; right?
47 A. That's correct.

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Q. As I understand it, following your discussion with Mr Shimoon on 13 October, your day book records a further discussion you had with Mr Shimoon on 23 October of 2000; is that right?

A. Probably.

Q. Is that correct?

A. Without seeing it - I had a number of conversations.

Q. Just bear with me for a moment, please.

A. If it's in my day book, I wrote it.

Q. I may have misled you there. Just going back to this conversation in October, did you discuss with Mr Shimoon - that's the discussion on 13 October --

A. Yes.

Q. -- commission?

A. I don't think so, because we were at the very early stages of discussions and this was leading to the registration of Alkaloids of Australia as a pharmaceutical supplier in Iraq. I don't think we discussed commission at that particular stage.

Q. I see. Did you have any discussion with Mr Shimoon in these early stages - that's October of 2000 - in relation to the costs of doing business in Iraq?

A. Probably not that early, but reasonably early Mr Shimoon started a common story about how expensive it was to do business in Iraq, how many overseas trips he had to make, the cost of accommodation in Baghdad, the cost of fees, services, charges in Baghdad. It was a constant theme that he mentioned through the period that we were dealing with each other.

Q. Were those discussions about the costs of doing business in Iraq and his expenses often accompanied by discussions about the commission that was to be paid to him?

A. It was usually part of - no, he mentioned it all the time, but he specifically referred to it when he was attempting to increase his commission.

Q. The initial discussion we've heard occurred on 13 October. If I can just take you, please, to this letter - that's AOA.0001.0708. This is a letter or a fax

1 sent to Mr Shimoon, purporting to be from Mr Ward, though
2 it's not signed, on 16 October - so that's three days after
3 your conversation?
4 A. Yes.
5
6 Q. It refers to a fax of 13 October?
7 A. Yes.
8
9 Q. Have you been able to locate a copy of that fax?
10 A. No.
11
12 Q. It refers to copies of blank forms "so we can complete
13 the details" - do you understand that to be a reference to
14 registration forms that had to be filled out registering
15 Alkaloids with the Ministry of Health?
16 A. Correct.
17
18 Q. You'll see on the bottom of that page there's some
19 handwriting. Are you able to identify that as
20 Mr Shimoon's?
21 A. I believe that to be Mr Shimoon's handwriting, yes.
22
23 Q. He having obtained that document and faxed it back
24 with those handwritten additions; is that right?
25 A. That's correct.
26
27 Q. He says in that note:
28
29 Please fill the application and forwarded
30 back by courier immediately...
31
32 Right?
33 A. Yes.
34
35 Q. "With letter of authorisation"; do you see that?
36 A. Yes.
37
38 Q. It says, "Look like Apotex letter"?
39 A. Yes.
40
41 Q. What does that refer to?
42 A. Another one of Shimoon's customers was a company
43 called Apotex and he sent us a copy of their form
44 appointing him as agent for Iraq, and he was saying to use
45 that as a template.
46
47 Q. We might come to that document in due course, but the

1 other reference there is to requesting another letter
2 stating 16 per cent commission to Albert Shimoon --
3 A. Yes.
4
5 Q. -- and his address; do you see that?
6 A. Yes.
7
8 Q. Is this, in your recollection, the first time that
9 commission was referred to by Mr Shimoon?
10 A. Whether it was that day or several days before in a
11 telephone conversation - it could well have been in the
12 conversation of 13 October, I'm not certain, but it was
13 about that time, yes.
14
15 Q. In short, Mr Shimoon wanted you to confirm - that's
16 APPC - in writing his commission you agreed to pay;
17 correct?
18 A. Correct.
19
20 Q. We'll come to other examples shortly, but would you
21 agree that it was a consistent requirement of Mr Shimoon
22 that you confirm his commission arrangement in writing?
23 A. Yes.
24
25 Q. On this particular occasion he refers to 16 per cent
26 commission. You would agree that that is a considerably
27 higher rate than APPC or Alkaloids would ordinarily pay its
28 overseas agents?
29 A. Yes, it is, but we're also flexible, and if that's
30 what the market requires, then we would incorporate the
31 necessary commissions in the pricing structures.
32
33 Q. When you received this facsimile, did you query
34 Mr Shimoon about his level of commission or have
35 discussions with him about it?
36 A. Probably, but I can't specifically remember.
37 Certainly we would have said that's high, and the problem
38 with a high commission is it means a higher price, which
39 means that you're less likely to get the business.
40
41 Q. Indeed. Following that communication, did you or
42 Mr Ward or your assistants fill out a registration form for
43 the Ministry of Health?
44 A. Yes.
45
46 Q. Could we go, please, to the first page of that
47 document. It's at AOA.0001.0770. That's the first page of

1 the multi-page form that you filled out?

2 A. Yes.

3

4 Q. As you understood it, it was a requirement of selling
5 pharmaceutical products into Iraq that you fill out that
6 registration form; is that right?

7 A. It's a very common requirement in most countries that
8 you have to go through a registration process to sell
9 pharmaceutical chemicals in that country, and this was
10 fairly typical of other registration processes we would
11 have done in other countries.

12

13 Q. I'll take you to the page if necessary, but you signed
14 that registration document on behalf of Alkaloids; is that
15 right?

16 A. Yes.

17

18 Q. Can I take you to this page, which I think may well
19 have accompanied the document. It's at AOA.0007.0049. Is
20 that a document that accompanied that registration
21 document, as best you recall it?

22 A. I'm not sure it was accompanied by the registration
23 documents, but if it was in that bundle it was, but
24 certainly we issued that document, yes.

25

26 THE COMMISSIONER: Q. They both bear the same date.

27 A. In that case, they probably did go together, sir.

28

29 MR WIGNEY: Q. Do you recall - I'll take you back to it
30 if need be - the 16 October fax where Mr Shimon requested
31 a letter of authority, or something to that effect?

32 A. Yes.

33

34 Q. Is that what this document is?

35 A. Yes.

36

37 Q. Did the wording for this document come from
38 Mr Shimon?

39 A. Yes.

40

41 Q. It says:

42

43 We wish to advise that Mr Albert Shimon of
44 International Health Products Enterprises
45 is the commercial Manager for Alkaloids of
46 Australia Pty Limited responsible for all
47 business activities in relation to product

1 registration, sales and marketing and
2 tender negotiations for Alkaloids of
3 Australia Pty Limited in the country of
4 Iraq.

5
6 Do you see that?

7 A. Yes.

8
9 Q. Was that a truthful statement?

10 A. With respect to Iraq at that particular time, yes.

11
12 Q. What did you do to satisfy yourself that Mr Shimoon
13 operated a company called International Health Products
14 Enterprises?

15 A. I'm afraid I didn't. I must say I thought he - with
16 my memory, I thought his company was called AS
17 International, but the reality is that Albert is a one-man
18 band and he probably has a number of companies floating
19 around.

20
21 Q. Well, this document represents that Mr Shimoon was the
22 commercial manager for Alkaloids of Australia Pty Limited,
23 suggesting, as it were, that he was employed by Alkaloids;
24 do you see that?

25 A. For the country of Iraq, yes, that's what it implies,
26 yes.

27
28 Q. Is that an accurate statement of Mr Shimoon's
29 commercial relationship with Alkaloids of Australia at the
30 time?

31 A. With respect to Iraq, he advised us that he required
32 this level of authority to negotiate in Iraq on our behalf.
33 We executed that document knowing that if he did something
34 that was - that we did not agree with or didn't like, we
35 simply didn't fulfil whatever things that he had agreed to
36 erroneously. We didn't expect him to do anything
37 erroneous, but if he had, then we simply ignored whatever
38 it was and no-one in Iraq could have done anything about
39 it.

40
41 Q. Would you agree with this proposition, that really the
42 true commercial arrangement between Alkaloids and
43 Mr Shimoon at this stage was that, at best, he was your
44 agent?

45 A. Correct.

46
47 Q. This letter doesn't refer to him being your agent; it

1 refers to him being the commercial manager of Alkaloids.
2 That's incorrect, isn't it?

3 A. Well, it depends on what the - you could construe it
4 that way, Mr Wigney, yes.

5
6 Q. Did you clear this document, his representation that
7 Mr Shimoon was the commercial manager of Alkaloids, with
8 the directors of Alkaloids?

9 A. No.

10

11 Q. You may have said this in your earlier answer, but was
12 the position that Mr Shimoon told you that for him to
13 negotiate contracts in Iraq, he would have to be seen as
14 being an officer or employee of the company, as opposed to
15 an agent?

16 A. I don't think he used those three words. My memory is
17 that he required documentation that he had the authority to
18 negotiate on behalf of Alkaloids of Australia. I don't
19 recollect any suggestion of him being an employee or not an
20 agent, or any of the like. But certainly he needed
21 something to establish that he had authority to negotiate
22 on behalf of Alkaloids of Australia.

23

24 Q. But you'd agree that an agent, depending on the terms
25 of their agency, has authority to negotiate on behalf of a
26 principal; right?

27 A. Yes.

28

29 Q. You've agreed that the commercial relationship between
30 Alkaloids and Mr Shimoon was one of agency.

31 A. Correct.

32

33 Q. Why didn't you say that he was the agent?

34 A. Because that was what he asked us to do to do the
35 business in Iraq.

36

37 Q. You were prepared to go along with it?

38 A. Yes, because I felt that the consequences to Alkaloids
39 of Australia were relatively minor, if any at all.

40

41 Q. Did you in due course receive from Mr Shimoon or
42 perhaps some other source a document that set out the
43 conditions and requirements of supply of pharmaceutical
44 products to the Ministry of Health?

45 A. Yes.

46

47 Q. If this document can be brought up on the screen,

1 please, AOA.0001.0697: can you identify that as a document
2 that you obtained that set out the conditions and
3 requirements of supply to the company to whom you proposed
4 to tender for the sale of this hyosci ne product?

5 A. Yes.

6

7 Q. And this particular version of the document you will
8 see has some ticks and other handwritten notations on it.
9 Did you and Mr Ward go through this document --

10 A. Yes.

11

12 Q. -- to ascertain what were the conditions that you had
13 to satisfy to put a tender to the Ministry of Health --

14 A. Yes.

15

16 Q. -- or entities under its control?

17 A. Yes.

18

19 Q. I want to just take you to a couple of the terms in
20 it, please. Firstly, you'll see in numbered paragraph 2
21 that it states:

22

23 Offer should state all commercial terms i e
24 (Name of manufacturer, Origin...)

25

26 Et cetera. Then these terms:

27

28 Payment terms, delivery time, method of
29 dispatch, packing details, prices in Net
30 form CIF Samara.

31

32 Do you see that?

33 A. Yes.

34

35 Q. Then if you go down to numbered paragraph 19, you'll
36 see that it states:

37

38 Prices to be quoted on CIF Samara basis in
39 Euro only.

40

41 A. Yes.

42

43 Q. This document is setting out that to supply to Iraq at
44 this time, the terms had to be CIF - that's cost insurance
45 freight - Samara; do you see that?

46 A. Yes.

47

1 Q. Samara being a town inland of Iraq; correct?
2 A. Correct.
3
4 Q. Was it the case that Alkaloids' usual terms of supply
5 were FOB, free on board?
6 A. No, they were usually CIF airport, so they would be
7 cost insurance freight to the airport in the country of
8 destination, such as --
9
10 THE COMMISSIONER: Q. The discharge, not the loading
11 port?
12 A. The discharge port, such as - I assume they had an
13 airport in Baghdad, it would be CIF Baghdad, assuming we
14 could air freight something to Baghdad or to Dhakar and
15 Bangladesh, or something like that, but not delivered
16 inland.
17
18 MR WIGNEY: Q. We'll come to the specifics soon, but in
19 this particular case the goods had to be flown or air
20 freighted to Amman in Jordan and then, in due course,
21 trucked over the border; is that right?
22 A. That's correct.
23
24 Q. This document was requiring your prices to include
25 trucking all the way to Samara?
26 A. That's correct.
27
28 Q. That's outside the ordinary terms that Alkaloids would
29 supply?
30 A. That is correct.
31
32 Q. Did you have any concerns about that issue?
33 A. Yes.
34
35 Q. Did you take them up with Mr Shi moon?
36 A. No. He said that is how you do it, and we went about
37 trying to find out how you did it, and to make sure that we
38 could do it with minimal risk to the company.
39
40 Q. Did he tell you why it was a requirement that this be
41 done?
42 A. No.
43
44 Q. If I can just direct you to another couple of
45 paragraphs in this document. Numbered paragraph 8:
46
47 SDI is not committed to accept the lowest

1 prices and is not committed to order the
2 Whole quantity of requirements.

3
4 Did you understand who or what the reference to SDI was?

5 A. I think it's an abbreviation of a company, but I'm not
6 absolutely certain.

7
8 Q. Did you have any discussions with Mr Shimon in
9 relation to that particular condition?

10 A. Not that I recollect.

11
12 Q. Numbered paragraph 20 states:

13
14 Payment, from Iraq's account in accordance
15 with SC resolution 1330/2000.

16
17 Did you understand that to be a reference to a particular
18 Security Council Resolution?

19 A. Yes, I understood that to be part of the United
20 Nations - by this stage by the United Nations Oil-for-Food
21 Program.

22
23 Q. Did you understand from that and by this time that you
24 looked at this document that the payment for the supply of
25 the goods would come out of an account called an escrow
26 account controlled by the United Nations?

27 A. I understood it would come out of funds held by the
28 United Nations on behalf of Iraq. The term "escrow" I'm
29 not particularly aware of, but I understood it was out of a
30 United Nations account, yes.

31
32 Q. The next paragraph I want to take you to is paragraph
33 27, which is on the second page of that document, 0698.
34 You'll see that it reads as follows:

35
36 According to the current regulations, all
37 correspondence...etc, should be carried out
38 & fulfilled directly between Buyer and
39 Seller only and not allowed for any agency
40 in Iraq or outside Iraqi (3rd party) to be
41 involved.

42
43 Do you see that?

44 A. Yes.

45
46 Q. May we take it you saw that at the time?

47 A. Yes.

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Q. Suggesting, as it were, that it was a condition or requirement of a tender to this particular company that it be direct from the principal, in this case Alkaloids, and not via an agent; right?

A. Yes.

Q. But you were using Mr Shimoon as an agent, were you not?

A. Yes.

Q. Not in compliance with this particular condition?

A. That's correct.

Q. Does this paragraph explain the document that I took you to earlier, where Mr Shimoon was described not as an agent, which was in fact the case, but as the commercial manager of Alkaloids?

A. I didn't put the two terms together at the time, but, yes, I think that's probably a fair description. As I said, he required authority to act on our behalf and I think it's a reasonable assumption to assume that it was partly in satisfaction of clause 27 of the tender document, yes.

Q. Did you have any understanding of the purposes behind that particular requirement; that is, that agents not be involved?

A. I'm not conscious or have any memory of thinking about that, no.

Q. You didn't turn your mind to whether that was a way of perhaps avoiding agents being used and extracting commissions and perhaps being involved in bribery or corruption?

A. I certainly did not.

Q. As I understand your evidence in your statement, the next substantial dealing you had with Mr Shimoon, once the registration documents had been sent to Iraq, was a conversation you had with him on 22 January 2001; is that right? You can have a look and refresh your memory --

A. Yes, January in 2001 was when we were submitting the actual tender.

MR BARKER: I don't know whether Mr Joyce has his statement with him.

1
2 MR WIGNEY: Q. I think that's what is in front of him?
3 A. The contract is in front of me.
4
5 Q. It is in the folder there. Feel free to refresh your
6 memory from those statements, if you wish. If you go to
7 paragraph 15 on page 7, you refer there to conversation you
8 had with Mr Shimoon on about 22 January 2001. Do you see
9 that?
10 A. Yes.
11
12 Q. We'll come to it in a moment, but the tender that was
13 provided to Mr Shimoon was dated 24 January, so this
14 conversation occurred shortly prior to --
15 A. Yes.
16
17 Q. -- that document being prepared. You prepared a note
18 of this particular conversation you had with Mr Shimoon in
19 your day book?
20 A. I could have, yes. Sorry, that's attached --
21
22 Q. Would you go, please, to the document at
23 AOA.0002.0138. That firstly is a note in your handwriting;
24 is that right?
25 A. Yes.
26
27 Q. On the top left-hand corner it has the date, I think,
28 2 February 2000. I can take you to --
29 A. It's the 22nd.
30
31 Q. Sorry, the 22nd. I can take you to the day book if
32 need be, but it would seem from the surrounding dates that
33 that is in fact an error and it was in fact 22 January
34 2000; does that accord with your recollection?
35 A. Mr Wigney, I'm having a small degree of difficulty. I
36 can't understand why this note, which is dated 22 February,
37 has anything to do with Iraq.
38
39 Q. Well, if you go over to the next page of your day
40 book, which is 0139 --
41 A. Oh, I see, right.
42
43 Q. -- sorry to confuse you, I was just trying to get from
44 you the date.
45 A. Sorry, I see.
46
47 Q. Do you identify that as a note that you took of your

1 conversation with Mr Shi moon on 22 January of 2000, not
2 22 February?

3 A. Yes, I think this probably did happen on 22 January,
4 because this seems to relate to the preparation of the
5 final tender documents, yes.

6
7 Q. You'll see "Albert" is written on the top left-hand
8 corner, and then if you go down from that there are a
9 number of paragraph numbers. I can take you back to the
10 conditions and requirement document if need be, but that
11 would appear to be paragraph references in that document,
12 you discussing them with Mr Shi moon?

13 A. Yes.

14
15 Q. I want to just direct your attention to the note on
16 the top right-hand corner. Firstly, you'll see, under
17 Mr Shi moon's name, there's what appears to be a telephone
18 or facsimile number, fax number?

19 A. Yes.

20
21 Q. Then there's the words "and wants letter 15% for
22 Albert"?

23 A. Yes.

24
25 Q. Do you recall discussing with Mr Shi moon on about this
26 day, 22 January, that he be paid 15 per cent commission?

27 A. Yes.

28
29 Q. Again, Mr Shi moon has requested that that be put in
30 the form of a letter and confirmed in writing by you;
31 right?

32 A. Yes.

33
34 Q. Again consistent with what we discussed earlier, that
35 is, his requirement, constant requirement, that matters
36 relating to his commission be confirmed in writing;
37 correct?

38 A. Yes.

39
40 Q. On that topic, perhaps if we go to the letter at
41 AOA.0001.0666. You'll see that that's a fax sent from
42 Kerry Megaw - she was one of the administrative assistants
43 at APPC, was she not?

44 A. Yes, that's correct.

45
46 Q. Dated 24 January - two days after this conversation -
47 you'll see that it says on the first and second lines:

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...that documents appear correct - he wants all six copies signed by you - esp the commission one!

Right?

A. Yes.

Q. Again it evidences Mr Shi moon's constant requirement that matters related to his commission be put in writing and sent to him; correct?

A. That's correct.

Q. If we can go back to your note again, AOA.0002.0139, you'll see in the top right-hand corner, there are some figures, 750, then plus 15, equals 885, and then 825. Are you able to recall the discussion you had with Mr Shi moon to which those notations relate?

A. Yes, I believe that they relate to negotiations of the next tender, and he's saying that he needs a price of US\$825. I think these are all in US dollars, because I don't think I was thinking in Euros at the time. In fact, I don't think prices in Euros at all. I think this relates to the next thing. He said he wants - our price at that time was around about US\$750. He said he wanted 8 - plus his 15 per cent gives you \$885, and he says he needs 825, and we said we couldn't do it.

THE COMMISSIONER: Q. 750 plus 15 doesn't equal 885, it's 862.5?

A. When I saw that note, Commissioner, back in December, I've done my best to recreate what it means. It clearly is cryptic on its own. That was the best of my memory that I can come to. I thought I actually worked that out that it was correct. Your mathematics is obviously better than mine, sir.

Q. My maths may well be wrong, but I think 15 per cent is 112.5 dollars, which would make 862.5.

A. In that case I don't know what it means.

MR WIGNEY: Q. Your evidence in your statement to an extent is an endeavour to reconstruct your note here into a conversation you had with Mr Shi moon; is that right?

A. That's correct, sir. I've done my best to assist the Commission in trying to explain my notes. You appreciate this note was done in 2001, nearly five years ago. I've

1 done my best to recreate what those notes - those notes
2 would have meant something to me at the time and in the
3 immediate time after that, but, as you've had the joy of
4 reading all of my day books for those periods, sir, you'd
5 find a lot of them quite cryptic. I'll be honest, I don't
6 remember them all, what all of it means today.

7
8 Q. I don't know that "joy" is a word that comes to mind
9 in relation to your day books, Mr Joyce. I think in your
10 statement you say that your recollection was that this
11 conversation related to the next tender; is that right?

12 A. Yes.

13
14 Q. As the Commissioner has already observed, if you add
15 15 per cent, that being the commission that you had agreed
16 to or discussed paying to Mr Shimon, to 750, you get the
17 figure of \$862.50 - I think you can accept my maths for
18 present purposes?

19 A. I accept your maths, sir. Mine aren't very good.

20
21 THE COMMISSIONER: 18 per cent gives you 885.

22
23 MR WIGNEY: Q. If you add 15 - you'll see there it says
24 750 plus 15. Accept for the moment that's 15 per cent. It
25 gets you 862.50. The tender price was ultimately 865; that
26 is, very close to that figure, do you agree?

27 A. 865?

28
29 Q. 865 Euros per kilo.

30
31 THE COMMISSIONER: Euros or dollars?

32
33 MR WIGNEY: Q. Euros?

34 A. The tender price was 855.

35
36 Q. 865.

37 A. 865, okay.

38
39 Q. I'll come to the document in a moment, but accept from
40 me that the tender price --

41 A. Yes, you're correct, sir.

42
43 Q. -- is 865 Euros and, as I said, if you add 15 per cent
44 to 750, you get 862.50?

45 A. Yes.

46
47 Q. Would you accept that that is probably --

1 A. Your explanation may be better than mine, sir.
2
3 Q. You're not talking about US dollars, you're talking
4 about how you would arrive at the tender price that
5 ultimately was put in the letter of 24 January to which
6 I'll come in a moment?
7 A. Yes. Your explanation probably makes more sense than
8 mine. But, as I said, I was trying to reconstruct it from
9 those cryptic notes and that was the best explanation I
10 could think of at the time.
11
12 Q. The figure 825, is it your recollection that
13 Mr Shimon was pressing to have the price lower than 885,
14 which is what this note records, or 865 per kilo, which is
15 what was ultimately tendered?
16 A. I don't particularly recollect it, but it wouldn't
17 surprise me if that's what happened. It's not uncommon for
18 agents to tell you to offer at lower prices. But I don't
19 particularly remember exactly that.
20
21 Q. Do you remember him saying anything to you about
22 having to keep the price at around 825 Euros per kilogram
23 so as to ensure that the tender would be accepted?
24 A. No, I don't recollect that, but I think that could
25 have happened. But I don't particularly recollect it.
26
27 Q. In your statement you say that the price, market
28 price, for hyoscine at this time - that's in January of
29 2001 - was about US\$750. Does that still accord with your
30 recollection?
31 A. I haven't checked that, sir. I have no reason to
32 change it. But I - it could be wrong.
33
34 Q. That's in your statement; that is, that the market
35 price at around that time was US\$750?
36 A. Yes, it is in my statement, sir.
37
38 Q. If you accept from me for present purposes that the
39 exchange rate between the US dollar and the Euro at about
40 that time, January of 2001, was US\$1 to about 1.068 Euros,
41 leading to a market price of approximately 800 Euros, does
42 that accord with your recollection of the market price at
43 the time?
44 A. I'm afraid I can't recollect that, sir. I would need
45 to check records to answer that question.
46
47 Q. There was a market price, a recognised market price,

1 for this hyoscine product at various times, was there not?

2 A. Yes.

3

4 Q. And you recall consulting that market price, or
5 carrying out research into that market price, at the time
6 that you were putting this tender in to ensure that the
7 tender was competitive and in accordance with that market
8 price?

9 A. I'm not sure "research" is the right word. Our
10 regular activities in the hyoscine market would have told
11 me at that time, as it does today, what is an achievable
12 price for hyoscine in the international market. That's
13 what I would have been basing my base price upon.

14

15 Q. That is --

16 A. There's not a stock exchange for hyoscine.

17

18 Q. When you were putting your tender price in, you were
19 endeavouring for it to be competitive and in accordance
20 with what you understood to be the market price for
21 hyoscine at that time?

22 A. Yes, and to maximise the returns to Alkaloids of
23 Australia.

24

25 Q. And in putting together the tender price, in addition
26 to endeavouring to make sure that it was at the market
27 price, you also had to build in Mr Shimoon's commission of
28 15 per cent, or thereabouts; is that right?

29 A. Correct.

30

31 Q. Incidentally, just perhaps by way of endeavouring to
32 understand this notation, and perhaps to try to refresh
33 your recollection, if the figure 825 that is in that note
34 is US dollars, at the then exchange rate - you again have
35 to accept my mathematics here - you'd come up with a price
36 of about 881 Euros per kilo; that is, close to the 885
37 figure that's referred to in your note. Does that refresh
38 your recollection about what this note was all about?

39 A. Not really, sir.

40

41 Q. But, in any event, you agree now that the likelihood
42 is that the discussion that generated this notation related
43 to the tender price for this particular tender, that is
44 under phase IX, and not, as you put in your statement, the
45 subsequent tender that occurred sometime later in the year?

46 A. Yes, it could relate to this tender, yes.

47

1 Q. The other notation I want to direct your attention to
2 is the notation that appears underneath those numerals;
3 that is, the words "needs 8 per cent to the people". Do
4 you recall Mr Shimoon saying those words to you, or
5 words --

6 A. I don't particularly remember those words now, sir,
7 but he obviously must have used them or I wouldn't have put
8 that down in my day book. But I don't particularly
9 remember.

10

11 Q. He was, in short, telling you in terms that it was
12 necessary for him to pay a percentage, which he puts at
13 8 per cent, to "the people", to use his words, in Iraq; do
14 you see that?

15 A. He doesn't say "in Iraq", sir.

16

17 Q. Well, it says "the people". Who did you understand
18 the people to be?

19 A. I understood that to be Shimoon's general comments
20 about the expenses in Iraq. He was paying all sorts of
21 people, from taxi drivers to hotels. There were no
22 specific people that he mentioned.

23

24 Q. He's put those expenses, as you term them, as a
25 percentage of the contract price, has he not, 8 per cent?

26 A. Yes, he has.

27

28 Q. Did you query him about who were the people to whom he
29 had to pay the 8 per cent?

30 A. Not that I recollect, sir, and I don't think I did.

31

32 THE COMMISSIONER: Q. It doesn't jump out that he's
33 talking about expenses of the nature of accommodation or
34 taxis.

35 A. He was talking about people, sir. I don't
36 particularly remember the comment. I can only read what
37 you can read on the screen. I do recollect that in the
38 entire comments of all of the negotiations I had with
39 Shimoon, at no stage did he ever refer to specific people.
40 One exception to that is the original contact he made with
41 respect to the director general of health that he went to
42 university with, but he constantly referred to people who
43 were parts of the decision-making process, the people that
44 he had to deal with, but he never was specific as to who
45 they were or even generally who they were, with that one
46 exception of the director general of health, which you've
47 already heard evidence on.

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MR WIGNEY: Q. Did it not cross your mind when he said this to you that he may be referring to the need for him to make some form of illicit payment to the people to secure the contract?

A. No.

Q. It didn't occur to you at all?

A. No.

Q. You just interpreted that as meaning payment of expenses and travel expenses?

A. Yes, he may have been making payments to people. You used the word "illicit". It did not occur to me that they were illicit payments, but they could well have been payments. Whether they were illicit or not, no, that didn't cross my mind.

Q. You personally can't recollect querying him --

A. I can't recollect querying him and I do not think that I did. I regarded all of that carrying on of Shi moon about his expenses as exactly that, carry on, and frankly, took not that much notice of it.

Q. Was that throughout your entire dealings with Shi moon in 2001 and 2002; that is, that was your attitude to comments he made along those lines?

A. Basically, yes, with respect to his expenses he had to incur and the costs of doing business in Iraq, and the like, I regarded that that was Albert trying to increase his margin.

Q. Some two days after this conversation you did in fact prepare the tender document. If I can take you to that. It's at AOA.0001.0654. Do you identify that as the tender document that you prepared for submission to the Iraqi entity?

A. Yes.

Q. That entity being the company described in the document as the State Company for Manufacturing of Drugs & Medical Appliances; do you see that?

A. Yes.

Q. In preparing this document, did you endeavour to follow or comply with the conditions and requirements document to which I took you earlier?

1 A. Yes.
2
3 Q. As we've already addressed, the tender price was 865
4 Euros per kilogram. That appears in the box.
5 A. Yes.
6
7 Q. I should ask you to clarify, there's two items in the
8 box. The first is just a kilogram of a different item,
9 described as "Scopolamine HBr", "1 kilogram". That
10 contract didn't ultimately eventuate?
11 A. Correct.
12
13 Q. The contract that did is referred to in the second
14 box, that's one tonne, 1,000 kilograms of
15 hyoscine-N-butyl bromide; right?
16 A. Yes.
17
18 Q. Consistently with the terms in the conditions and
19 requirements document to which we've already referred,
20 you'll see that the price is quoted CIF net air, CIF
21 Samara - that is, you incurred the costs of delivering it
22 to the town of Samara?
23 A. Yes.
24
25 Q. It's addressed to the State Company for Manufacturing
26 of Drugs & Medical Appliances at a particular post office
27 box in Samara?
28 A. Yes.
29
30 Q. But your evidence is, is it not, that you supplied
31 this document to Mr Shimoon?
32 A. I'm not certain where the document went to, sir. It's
33 possible that it went to both Shimoon and also to the Iraqi
34 company at a Baghdad address. If there's some other
35 documents there that suggest it could have - if you refer
36 to the email that Kerry Megaw sent to me which you had on
37 the screen not long ago, she suggests that we've got to
38 send it to both addresses. But I honestly don't know where
39 it went to. It certainly went to somewhere in Iraq.
40 Whether it went to Shimoon or it went to Shimoon and to the
41 company, I can't answer that question with certainty. I've
42 checked our courier records. They're not adequate to
43 answer that question.
44
45 Q. Can I just take you back briefly to the note that we
46 were just discussing before of your conversation on
47 22 January - that's at AOA.0002.0139. We'll see if this

1 refreshes your memory. You'll see on the bottom part of
2 that page there's a reference to "IKE Express Skynet"?
3 A. Yes.
4
5 Q. Then there's an address in Jordan?
6 A. Yes.
7
8 Q. And then a notation further down "Please forward to
9 Baghdad IKE Express Skynet Attention Anna"; do you see
10 that?
11 A. Yes.
12
13 Q. Can I suggest to you that what occurred was that you
14 sent these documents to the address referred to in that
15 note to Jordan for on-sending to the address at Baghdad
16 because there were some difficulties getting couriers
17 direct into Baghdad?
18 A. That is correct. That was the reason that was used.
19 You couriered it to this company in Jordan in two
20 envelopes. The first envelope was addressed to them, the
21 second envelope was addressed to their office in Baghdad,
22 and the third envelope was addressed to wherever you really
23 wanted it to go to in Baghdad.
24
25 Q. Well, this particular notation says "please forward to
26 Baghdad" "attention Anna"?
27 A. Yes.
28
29 Q. Do you recall that Anna was Mr Shimoon's secretary or
30 assistant?
31 A. No, I think Anna worked for IKE Express.
32
33 Q. I see.
34 A. That's why I'm not sure what happened to it in
35 Baghdad. It went to Baghdad, to IKE Express, but I can't
36 work out whether it went directly to the company or it went
37 to Shimoon. I can't answer that question.
38
39 Q. You've made reference to Kerry Megaw's fax earlier.
40 If I can just take you back to that document,
41 AOA.0001.0666. It says, "Albert rang back and advised that
42 documents appear correct". Pausing there, that would
43 appear to be a draft of the tender document; correct?
44 A. Yes.
45
46 Q. "he wants all six copies signed by you" - that's six
47 copies of the tender document; correct?

1 A. Yes.
2
3 Q. You referred earlier to something in this letter
4 suggesting to you that these tender documents were sent to
5 the Iraqi company. Can you just point that out to us,
6 please?
7 A. Well, in the second line she says "three sets direct
8 to Iraq and three sets to him".
9
10 Q. I see.
11 A. I'm not too sure who in Iraq they went to. He was
12 going to Iraq about the same time as this was happening.
13
14 Q. Okay.
15 A. I can't remember whether he was still in Canada or he
16 was in Baghdad, or he was going to get to Baghdad. He was
17 going to get the documents. I do not seem to be able to
18 reconstruct what happened at that time.
19
20 Q. You certainly don't have any documents suggesting that
21 you sent it by courier or otherwise direct to the company
22 to which it's addressed?
23 A. No, we do not.
24
25 Q. I just want to direct your attention to your
26 statement, please. This perhaps can also be put up on the
27 screen if necessary. It's at page 8, and the barcode
28 number is AOA.0007.0010. You obviously, when you prepared
29 this statement, checked it carefully to ensure that it
30 accorded with your recollection; right? This is your
31 statement of --
32 A. To the best I could of my recollection, yes.
33
34 Q. When you prepared it, you had access to all of your
35 documents, including your day books and correspondence in
36 your files?
37 A. Yes, this much of them, yes.
38
39 Q. If you go to page 17 of your statement, it says, "The
40 tender documents were sent following day directly to
41 Shimmon". That presumably was meant to be a reference to
42 Shimoon; do you see that?
43 A. Yes.
44
45 Q. "These were sent, again by Skynet Express, directly to
46 AS" - that's Mr Shimoon - "for him to lodge with the Iraqi
47 authorities"; right?

1 A. Yes.

2

3 Q.

4

5 I'm unable to say whether the tender
6 documents as prepared by us or at all were
7 delivered to SCMDMA --

8

9 that's the Iraqi company --

10 A. Yes.

11

12 Q. -- "by AS". Clearly the statement you seem to be
13 saying here is that your recollection is you sent it
14 directly to Mr Shimoon and you can't say whether the Iraqi
15 company got it at all; is that right?

16 A. What I'm saying is I definitely remember that we sent
17 them to Shimoon. We may have also sent them directly to
18 the company. I'm sorry, I don't remember whether we did or
19 didn't send them to the company, so I can't say for certain
20 whether the company got them directly from us or not.

21

22 Q. This part of your statement suggests that you sent
23 them directly - that is all of the copies - to Mr Shimoon;
24 do you agree? There's nothing in those paragraphs, in
25 paragraph 17, to suggest that the documents were sent by
26 you directly to the company.

27 A. I didn't intend that impression, sir. I wasn't
28 intending to try to be cute. I concede the possibility
29 that we did send them directly to the company as well as
30 sending them to Shimoon.

31

32 Q. Can I suggest to you that the likelihood is that you
33 sent all of the documents to Mr Shimoon and relied on him
34 to place them, or copies of them, before the company; what
35 do you say to that suggestion?

36 A. That is possible.

37

38 Q. It's likely, isn't it?

39 A. I'm not sure I'd go that far. It's certainly possible
40 and the most probable explanation, but I'm not sure I'd go
41 as far as likely. What I'm saying is I don't know.

42

43 Q. He was your agent on the ground, as it were, in
44 Baghdad, Iraq, right?

45 A. Yes.

46

47 Q. He was someone who had represented to you that he had

1 connections --

2 A. Yes.

3

4 Q. -- and, to use his words, buddies in Iraq; right?

5 A. Yes.

6

7 Q. That could look after the documentation and other
8 requirements of the Oil-for-Food Program; right?

9 A. Yes.

10

11 Q. The likelihood is that you relied on him to produce
12 these documents to the company?

13 A. Yes, it is likely. It's possible - it's probable,
14 sir. It's probable. I don't know. I don't know how we
15 got those documents to the company. If I knew, I would
16 tell you.

17

18 Q. If we can just go back, then, to the tender document,
19 please, to the third page, at 0001.0656. You've already
20 agreed that you endeavoured to follow the conditions and
21 requirements document in compiling this tender. If you go
22 to the second paragraph on that page, you state:

23

24 All correspondence etc, will be carried out
25 & fulfilled directly between Buyer and
26 Seller only and not allow for any agency in
27 Iraq or outside Iraq (3rd party) to be
28 involved.

29

30 Now, they seem to be the words derived from the conditions
31 and requirements document to which we've already referred;
32 right?

33 A. Yes.

34

35 Q. If it were the case that Mr Shimon, as your agent,
36 was being provided by you with these documents and for him
37 to take them to the company, you would not be complying
38 with that second paragraph of this letter, would you?

39 A. Probably not.

40

41 Q. Was that a matter of concern to you?

42 A. Not particularly. We were - it was clearly impossible
43 for us to do business in Iraq on a direct basis. It would
44 not have been possible for us to travel to Iraq, understand
45 how the Iraqi buying system worked. It would be clearly
46 impossible for us to do that business on a direct basis.
47 So we used an agent who knew what it was - knew how to do

1 the business. So we just regarded this as a clause that we
2 couldn't possibly comply with and no other supplier in the
3 world could comply with.

4
5 Q. Why did you put it in the letter?

6 A. Because that's what they asked us to do.

7
8 Q. It amounts to a misrepresentation, does it not?

9 A. Probably.

10
11 Q. "Probably" - it does, doesn't it; it's not just
12 probably?

13 A. Yes.

14
15 Q. You were prepared to misrepresent Mr Shimon's
16 capacity or commercial relationship with Alkaloids of
17 Australia so as to get the deal done, were you?

18 A. I have to say that I didn't put that level of
19 significance on it at the time, Mr Wigney, but I suppose
20 with the ability to look back from 2006, yes, you could put
21 that interpretation upon it. It's not something I thought
22 about at any great length at that time.

23
24 Q. You accept certainly that you provided at least some
25 copies of this tender to Mr Shimon?

26 A. Yes.

27
28 Q. You're unable to say now whether some others were sent
29 directly to the company; right?

30 A. Correct.

31
32 Q. In respect of those that you gave to Mr Shimon, did
33 you tell him to give or present those tender documents to
34 the state company in that form?

35 A. I understood that that's what he was going to do to
36 them - do with those documents. I don't think I used that
37 instruction to him, because I think that would have been
38 implicit in our negotiations and discussions up to that
39 point of time.

40
41 Q. Indeed. You had endeavoured to follow the conditions
42 and requirements in the document to which we've already
43 referred when you prepared this tender document; right?

44 A. Yes.

45
46 Q. As we've seen from Ms Megaw's fax, six copies of those
47 were prepared; right?

1 A. Yes.
2
3 Q. You expected and understood that Mr Shimoon would
4 provide that document to the state company; right?
5 A. Yes, I understand that, yes. But I don't think I
6 actually used those words that you used, but I certainly
7 understood that's what was going to happen, yes.
8
9 Q. In short, you expected Mr Shimoon to put on behalf of
10 Alkaloids an offer to sell a thousand kilograms of hyoscine
11 at the price in the tender document - that is, 865 Euros
12 per kilogram; right?
13 A. That's correct.
14
15 Q. You didn't expect or understand him to put a higher
16 price to the company?
17 A. I did not.
18
19 Q. Did you discuss this with him?
20 A. Not particularly, no.
21
22 Q. Did you ever expressly authorise him to put a higher
23 price as an offer to the company?
24 A. Not explicitly, but in discussions that I'm sure we'll
25 come to in May of 2001 that matter was discussed. But not
26 at this time, no, absolutely not.
27
28 Q. We'll come to it specifically in a moment, but you're
29 aware, aren't you, that ultimately the contract that was
30 entered into between Alkaloids and the state company was
31 significantly higher than this tender price, wasn't it?
32 A. That's correct.
33
34 Q. It was at the price of 955 Euros per kilogram; right?
35 A. Yes.
36
37 Q. Again, if one does the mathematics, that works out to
38 be just a smidgeon over 10 per cent higher than the price
39 in the tender offer; right?
40 A. That's correct.
41
42
43 Q. I just want to explore with you, Mr Joyce, how it can
44 be that a tender offer can be made at 865 Euros per kilo
45 and a contract ultimately being at a price some 10 per cent
46 more than that, at 955 Euros per kilo; right? Do you
47 understand?

1 A. Yes.

2

3 Q. You would agree that that is a fairly unusual
4 circumstance in your experience as a trader?

5 A. No. I wouldn't agree with that at all.

6

7 Q. What, that you make an offer to sell goods at a price
8 of 865 Euros and they ultimately agree to provide or to
9 contract at a price 10 per cent higher than your offer
10 price?

11 A. It is not unusual, and I'm not saying it is common,
12 but I'm saying it is not unusual that we work with agents,
13 that we will indicate a price to the agent and he will come
14 back and advise that the sale price to the customer is
15 somewhat higher than what we had originally discussed and
16 that he would be the beneficiary of that overprice, or we
17 may split that overprice, or that he takes the whole lot of
18 the overprice. So that is not an uncommon practice.

19

20 Q. We'll come to that in a moment, but as I understand it
21 that's your explanation for how this came about in this
22 particular case; is that right?

23 A. That's correct.

24

25 Q. Can I suggest two possibilities for how this could
26 have come about: the first of those possibilities is that
27 the tender letter which sets out the lower price, 865 Euros
28 per kilo, whilst it was provided to Mr Shimon, he did not
29 provide it at all to the Iraqi company?

30 A. I don't know.

31

32 Q. Have you ever asked him?

33 A. No.

34

35 Q. Never?

36 A. No.

37

38 Q. Whether this document that you'd spent some time
39 preparing and discussing was even ever given to the Iraqi
40 authorities?

41 A. No.

42

43 Q. You never had any discussion with him about it at all?

44 A. I - no, I haven't had any discussion with him about
45 it. Until this very moment I always assumed that he gave
46 it to them, or some form, something like it. Obviously
47 I've got some doubts as to what happened with the price,

1 but the rest of the document I can't - I just always
2 assumed he gave it to them. So I never - I've never
3 thought about that before.

4
5 Q. What were the doubts you had in relation to the price
6 that you've just referred to?

7 A. Well, when we get to May 2001 and we have the argument
8 with Shimoon about the magnitude of his commission,
9 somewhere prior to that I had agreed to whatever he gets
10 above the 865 he could keep. When we first learnt of the
11 955 and that there was actually a 90 Euro overprice in the
12 transaction, I remember a surprise, and, I suppose, as a
13 bit of an old merchant, a certain level of admiration that
14 he'd managed to get away with such an unbelievable margin.

15
16 Q. We'll come specifically to those discussions you say
17 you had with Mr Shimoon shortly, but what you're saying is
18 that, even though you ultimately discovered that the
19 contract price was some 10 per cent higher than your tender
20 offer, you never asked Mr Shimoon about whether he in fact
21 ever gave the company your tender document?

22 A. No, I did not.

23
24 Q. Can I suggest another possibility - that is, that the
25 tender document went to the company, but for some reason
26 the company agreed to contract for a higher price, in this
27 case some 10 per cent higher; that's the second
28 possibility, isn't it?

29 A. That is a possibility.

30
31 Q. That is, they get the letter, they are still
32 nonetheless prepared to pay 10 per cent more than the lower
33 price you've offered, right?

34 A. That is possible.

35
36 Q. Just dealing with those two possibilities for a
37 moment, Mr Joyce - and I can take you back to it in a
38 moment if you wish - we've already got your agreement to
39 the fact that you put some considerable care into the
40 tender offer; right?

41 A. Yes.

42
43 Q. You discussed it with Mr Shimoon; right?

44 A. Yes.

45
46 Q. He approved its contents?

47 A. Yes.

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Q. Suggested that it was all in accordance with the conditions and requirements, and the like?

A. Yes.

Q. He requested six copies of it to be prepared; right?

A. Yes.

Q. In all of those circumstances, including Mr Shi moon's request for six copies, it's unlikely that he never intended to give it to the company, isn't it?

A. I have no idea. He must have given something to the company, because there was a whole lot of information in that tender document that's got nothing to do with the price. I assume he must have.

Q. The likelihood is of those two possibilities that he did provide the document, the tender offer, to the company but for some reason it was prepared to pay 10 per cent more than the price that you were offering to accept; right?

A. Yes.

Q. Did you ever ask Mr Shi moon what were the circumstances that led the company to be prepared to pay 10 per cent more than you had offered or indicated that you would be willing to accept?

A. When we discovered that this had happened, in May 2001, I assumed it was Shi moon had gained himself an overprice, and I never thought of any of the other possibilities that you have mentioned and which, with the eyes of 2006, are perhaps obvious. But in 2001 it - that just didn't occur to me at all. I hadn't had the benefit of Volcker or of this inquiry in May 2001.

Q. Did you ever, including in your discussions with him when you ascertained that the contract price was some 10 per cent higher, ask Mr Shi moon how he managed to extract that higher price from the Iraqis?

A. No.

Q. Well, that was a matter of acute interest to you as an experienced trader or merchant, wasn't it?

A. Not really. It was a - that's what he did, and I'd agreed with him that he would collect any overprice. So I was surprised at its magnitude, but until you actually did the mathematics, sir, in our preliminary discussion in December, I'd never actually worked out it was close to 10

1 per cent. It was 90 Euro, it was always 90 Euros. That's
2 a lot, and I accept your mathematics, but, no, it never
3 occurred to me to ask him why that number - how he did it.
4

5 Q. You agreed with me earlier, when I was asking you
6 about your putting together this tender letter, that one of
7 the things you did was to consult or ascertain what the
8 market price was for hyoscine at about that time?

9 A. Yes.

10
11 Q. And pitch your offer at around the market price,
12 right, to make it competitive?

13 A. Correct.

14
15 Q. That's what you did?

16 A. Yes.

17
18 Q. Having done that, you would agree that the price of
19 865 Euros per kilo was most likely to be somewhere around
20 the market price; right?

21 A. Yes.

22
23 Q. And here we have the Iraqi State Company for Medicines
24 agreeing to pay 10 per cent more than what you understood
25 to be the market price; right?

26 A. Yes.

27
28 Q. Are you able to offer any explanation as to how that
29 could have come about?

30 A. When I say there's a market price for hyoscine, it is
31 not a commodity listed on any commodity exchange. You
32 can't go to Chicago's exchange and get a price. There are
33 only a few sellers of this product in the world; there are
34 only a few buyers. It is not uncommon for the achievable
35 prices to vary by as much as \$50, \$60 a kilo for the same
36 product to different customers. Certainly a margin of
37 90 Euros is very, very high, but in fact it is just within
38 the parameters of what is possible in the price ranges that
39 are achievable for the price variations in hyoscine. So it
40 did not occur to me to pursue Shimon as to why he got that
41 figure or how he got that figure.

42
43 Q. Even though it was some 10 per cent higher than the
44 lower price that you had indicated to the authorities you
45 were prepared to accept; right?

46 A. Yes.

47

1 Q. And even though it was 10 per cent more than what you
2 had assessed to be the market price for hyoscine at the
3 time of the tender; right?
4 A. It was 90 Euros higher than what I assessed to be the
5 market, yes.
6
7 Q. Which you've already accepted is just a smidgeon more
8 than 10 per cent?
9 A. Yes.
10
11 Q. Yet you never raised with Mr Shimoon how he managed,
12 or the circumstances in which he managed, to extract this
13 higher price from the Iraqis?
14 A. No, I did not.
15
16 Q. Did it ever come into your thoughts at the time that
17 it may have something to do with the fact that, as you've
18 already agreed, you knew that the money for the payment of
19 this contract was coming from an account controlled by the
20 UN?
21 A. No.
22
23 Q. We'll come to your evidence about the discussions you
24 had with Mr Shimoon to which you've referred about
25 overpricing in a moment, but if we come back to the time of
26 the tender - that is, 24 January - you agree, and I can
27 take you to the document if need be, that on the same day -
28 I think I've already taken you to it - you wrote to
29 Mr Shimoon at his address in Canada confirming that the
30 commission to be paid to him was 15 per cent; right?
31 A. Correct.
32
33 Q. That had been factored into the tender price?
34 A. Correct.
35
36 Q. That letter, which is at AOA.0001.0667, which I've
37 taken you to before, says nothing whatsoever, of course,
38 about paying Mr Shimoon an overprice commission to which
39 you've just referred in your evidence?
40 A. That letter was dated in January 2001 and that was not
41 part of the considerations at that time.
42
43 Q. So, as at the tender date, your arrangement with
44 Mr Shimoon was 15 per cent commission; right?
45 A. That's correct.
46
47 Q. Which you've already agreed for APPC, or Alkaloids,

1 that was a high level of commission, higher than usual;
2 right?

3 A. Correct.

4

5 Q. At about the time of this tender offer of 24 January,
6 or shortly thereafter, you commenced having discussions
7 with Mr Shimoon about a further offer under a different
8 phase of the Oil-for-Food Program, did you not?

9 A. That could be correct, yes.

10

11 Q. I want to take you, please, Mr Joyce, to a note of a
12 conversation that it appears you had with Mr Shimoon about
13 six days after the tender letter was dispatched - that's
14 30 January 2001 - and the notes from your day book, it's at
15 AOA.0002.0144. It's dated 30 January 2001. If that could
16 be brought up on the screen, please. That is a terrible
17 copy. We'll do what we can. I should indicate I have your
18 original day books in court if you need access to them.

19 A. I can read it.

20

21 Q. About a third of the way down the page there's a line
22 and then underneath that line it reads - correct me if I'm
23 wrong:

24

25 Documents arrived in Jordan. Will arrive
26 Baghdad today.

27

28 Is that correct?

29 A. Yes.

30

31 Q. May we take it that that, some six days after the date
32 of the tender offer, probably relates to the tender letter;
33 right?

34 A. I would assume so, yes.

35

36 Q. Then he says:

37

38 Post original commission letter with
39 original signature to Canada address.

40

41 Right?

42 A. Yes.

43

44 Q. That again is, I would suggest, consistent with
45 Mr Shimoon insisting on ensuring that his agreement with
46 you in relation to the payment of commission was documented
47 and the document provided to him; right?

1 A. Yes.

2

3 Q. On this particular occasion he's gone to the extent of
4 requiring you to send him the original letter with the
5 original signature to Canada; right?

6 A. Yes.

7

8 THE COMMISSIONER: Q. It does rather suggest that some
9 of the documents went to Jordan, consistent with the
10 earlier note?

11 A. Yes, had gone to Jordan on their way to Iraq.

12

13 THE COMMISSIONER: Yes.

14

15 MR WIGNEY: Q. Just going through this note again, it's
16 got:

17

18 Geofman still working with him on
19 non-hyosci ne products.

20

21 Geofman was a Pakistani company, was it not?

22 A. Yes.

23

24 Q. It was the company to whom at some stage Alkaloids had
25 supplied a hyosci ne or hyosci ne-related product?

26 A. That's correct.

27

28 Q. Ultimately they did some processing of it and supplied
29 the processed product to Iraq, on your understanding?

30 A. Yes.

31

32 Q. On this occasion Mr Shimon is communicating with you,
33 is he not, that he's still working with Geofman, but now in
34 relation to non-hyosci ne products?

35 A. Yes.

36

37 Q. Then he says this:

38

39 Has to pay --

40

41 then there are dollar signs --

42

43 up front to the director. Geofman has paid
44 two thirds of this to Shimon for AA.

45 Albert paying from his own pocket as he
46 trusts us - he does not trust Saboure.

47

1 Who was Saboure?
2 A. He's the principal of Geofman. Mr Commissioner, those
3 remarks, if they become public - Geofman is still a
4 customer of ours. If those comments were to become public,
5 it probably wouldn't do us any good with business with
6 Mr Saboure. Is it possible for those remarks about Geofman
7 to remain confidential, or the names of the company to
8 remain confidential?

9
10 THE COMMISSIONER: What do you say, Mr Wigney?

11
12 MR WIGNEY: I don't have any objection to that,
13 Commissioner.

14
15 THE COMMISSIONER: Yes, very well. I'll make a
16 confidentiality order in relation to the names in the
17 paragraph that's just been read.

18
19 THE WITNESS: Thank you.

20
21 MR WIGNEY: Q. I'll come to the words that we've just
22 read out in a moment, but let's just recap somewhat. The
23 tender that you had supplied or prepared was to the State
24 Company for Manufacturing and Drugs; right?

25 A. Yes.

26
27 Q. You knew in some way that that state company was
28 linked, as the name would suggest, with the Ministry of
29 Health; right?

30 A. I assume so, yes.

31
32 Q. And you prepared, for the purposes of making the
33 tender, a registration application to the Ministry of
34 Health; right?

35 A. Correct. I didn't exactly know the relationship of
36 that company within the Iraqi hierarchy. I mean, we supply
37 private companies in many countries, but you need the state
38 authority to approve you as a supplier. So, to be honest,
39 I didn't really know whether that company was owned by the
40 Iraqi Government or was a private company within Iraq. I
41 didn't really know that. I still don't know that.

42
43 Q. It says the "state company". I think it's a fair bet
44 that it is owned by the state, is it not?

45 A. You can have all sorts of funny company names,
46 Mr Wigney. It's a reasonable assumption, but I don't know
47 that I gave that matter any thought and I don't know that I

1 knew that at the time.

2

3 Q. In his initial conversation with you in October of
4 2000, Mr Shimoon had said he was friends with the director
5 general of health; right?

6 A. That's correct.

7

8 Q. And would you agree that it is clear that, when he
9 used the word "director" and said has to pay money upfront
10 to the director, he was referring to the director general
11 of health; right?

12 A. No, it's not clear at all.

13

14 Q. Do you recall him saying these words to you, that he,
15 Mr Shimoon, has to pay money or dollars upfront to the
16 director?

17 A. I remember that he made all sorts of statements about
18 directors at various times and it was clear from those
19 conversations he was not always talking about the same
20 director. "Director" is a term used in the Middle East to
21 be the manager of a particular division of an operation and
22 it can be used in anywhere from the director general of
23 health, as we would use that term within the Australian
24 Public Service, to "director" meaning the managing director
25 of a company, as we would use the term. It was never clear
26 to me which director he was talking about in any particular
27 occasion, with the one exception when he was referring to
28 the director general of health in that conversation in
29 October 2000.

30

31 Q. I think my question to you was do you recall him
32 saying these words to you, "has to pay money or dollars
33 upfront to the director?"

34 A. I don't particularly remember them, but I wrote them
35 in my day book, so he must have said them to me.

36

37 Q. When he said those words to you, did you ask him what
38 he was talking about?

39 A. I don't particularly recollect having done so, no.

40

41 Q. Do you recall asking him who he was referring to when
42 he said "director" this time?

43 A. No, I don't recollect doing that.

44

45 Q. Do you recall asking him why he had to pay money
46 upfront to the director?

47 A. No, I do not recollect doing that.

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Q. Did it cross your mind when he said those words to you, "has to pay money or dollars upfront to the director", what he was suggesting was the making of some illicit payment or bribe?

A. It's probable that during all of this, whether in this particular conversation or some other time, the possibility of payments being made to various people was always a possibility. There was never any explicit statement of it, whether these statements were illicit payments or payments to facilitate business I don't know. I have no knowledge of such payments. He never told me about such payments.

Q. Would not the making of that statement to you that Mr Shimoon "has to pay money or dollars upfront to the director" start ringing alarm bells in your head about bribery or corruption?

A. Not alarm bells, no.

THE COMMISSIONER: Q. Because it's expected in this area of the world?

A. I think, Commissioner, that western businessmen, and myself included, almost have a common stand of belief that in the Middle East those types of payments are common. I sometimes think that the major reason for that is that it's a view promulgated by agents in the Middle East so that we western businessmen will pay them higher commissions in justification of their higher commissions and what they claim to be those types of payments as expenses. I don't have any direct knowledge of it at all, but it's certainly, I think, common wisdom in western business circles that those types of payments in those Middle East countries are common, and I guess I have those same prejudices, if you will.

Q. Or beliefs?

A. Or beliefs, yes.

Q. That's fairly clearly what this note is referring to, isn't it?

A. It's a claim by Shimoon to that effect, yes. Whether it actually happens or not I don't know. But it's certainly Shimoon's claim, yes.

MR WIGNEY: Q. Is what you're saying this - disagree with me by all means - that you recall turning your mind to whether bribery was involved when he said these words to

1 you, but you didn't believe him; is that a fair assessment?
2 A. No, I don't think I either believed or disbelieved
3 him. Like a lot of things Shimon said to me, they largely
4 washed over. I didn't see it as relevant to what I was
5 doing.

6

7 Q. You didn't ask him at all about it, ask him to
8 explain, ask him what he was talking about?

9 A. No.

10

11 Q. You shut your eyes to it; is that what you're saying?

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Q. We'll come to that shortly. From your perusal of your files, APPC files, it's apparent that there were some further discussions or negotiations between you or Mr Ward on behalf of Alkaloids and Mr Shimon in relation to his commission in May of 2001; right?

1 A. That's correct.

2

3 Q. There are a number of documents or pieces of
4 correspondence in your files that refer to those
5 discussions; right?

6 A. That's correct.

7

8 Q. If I can try to take you to them as quickly as
9 possible. If we can go firstly to --

10

11 THE COMMISSIONER: Q. Just before you go ahead, this
12 note we've been looking at is addressing a date 30 January
13 2001, I think?

14 A. Yes, I think that's a conversation that occurred on
15 that day, yes.

16

17 Q. So this is a discussion regarding payments upfront at
18 a time before the making of the contract, but at the time
19 approximating, at least, the lodging of the bid?

20 A. Yes.

21

22 Q. So it could only relate, couldn't it, to a bribe?

23 A. I'm not sure what the timing of the offer has to do
24 with your question, sir.

25

26 Q. Well, you sent the tender documents across on roughly
27 the 24th, exhibit 28?

28 A. Yes, that note shows they arrived in Jordan about
29 then, yes.

30

31 Q. That's right. So this man who is the agent is saying
32 he's making payments to someone called the director - we
33 have to work out who that is - in advance; in advance,
34 presumably, of you paying him some commissions. I'm having
35 difficulty at present in understanding how it could relate
36 otherwise than to a payment to some form of official who he
37 describes as the director with a view to obtaining a
38 successful outcome to the contract or offer which has just
39 been sent some five or six days before.

40 A. I think, sir, this paragraph, commencing "Geofman" and
41 finishing with the word - the principal's name and the
42 company, that whole paragraph relates to that Pakistani
43 company and both of Mr Shimon and ourselves had done
44 business with that Pakistani company, and I think that
45 whole paragraph relates to Mr Shimon's activities with
46 that company, not with us.

47

1 Q. Well, except that it says "AA, Albert paying from his
2 own pocket as he trusts us"?

3 A. Yes. It could mean - Mr Wigney has speculated on a
4 couple of occasions what it could mean, so I guess I'm
5 entitled to a speculation as well - it could mean that
6 Shimoon demanded his commission upfront from the Pakistani
7 company, but he was prepared to trust us for his commission
8 payment after shipment.

9
10 Q. Surely he couldn't require payment of a commission
11 before the contract had even been accepted?

12 A. He could try.

13
14 Q. But he wouldn't have any prospect of success?

15 A. With us, no, but perhaps that's what it meant, that he
16 was able to extract that out of the Pakistani company. I
17 don't know what - today I can't remember what it refers to,
18 but I suggest to you that that's a reason - as good a
19 speculation as any of the others we've heard this morning.

20
21 Q. I think that's a much lesser speculation, if I may say
22 so?

23 A. Well, it is, sir, because your speculation is far more
24 important than mine.

25
26 THE COMMISSIONER: I don't like to speculate at all, I like
27 to know.

28
29 MR WIGNEY: Q. Mr Joyce, you - that is, Alkaloids or
30 APPC - weren't doing any business with Geofman through
31 Mr Shimoon or otherwise, were you?

32 A. No.

33
34 Q. How could your hypothesis sit with the fact that he's
35 talking about not requiring you to pay something upfront?
36 It just doesn't sit, does it?

37 A. Well, it does if you knew the Pakistani company
38 involved, it's not one that you have a large amount of
39 faith in.

40
41 Q. No doubt. Mr Shimoon didn't have any faith in them,
42 that's why he required them - that is Geofman - to pay him
43 the money that he was paying to the director in advance;
44 right?

45 A. It is also possible he was demanding other payments in
46 advance as well, but I don't know what they were.

47

1 Q. As I think you've already agreed, Mr Shimoon was
2 saying to you that, unlike the case with Geofman, who he
3 didn't trust, he trusted you, so he wasn't requiring you to
4 pay money upfront, that being the money he was paying to
5 the director; that's right, isn't it?
6 A. It could be, sir, yes.
7
8 Q. It is right; what other explanation is there?
9 A. Well, it probably does mean that, yes.
10
11 Q. Even if he was, as you speculated, requiring Geofman
12 to pay commission upfront, it was so that he could pay out
13 of that commission the money that he had to pay upfront to
14 the director; right?
15 A. That's probably the explanation, sir.
16
17 Q. Either way, it's as plain as a pikestaff that he's
18 talking about paying a bribe to the director, isn't it?
19 A. He's paying something to the director.
20
21 Q. Well, what else could it be other than a bribe?
22 A. I don't know.
23
24 Q. And you didn't ask him?
25 A. No, I didn't.
26
27 Q. Because you were shutting your eyes to it, weren't
28 you, Mr Joyce?
29 A. No, sir.
30
31 Q. I was taking you to some discussions you or Mr Ward
32 had with Mr Shimoon in May of 2001 in relation to his
33 commission. The first document I wanted to take you to was
34 AOA.0001.0632, if that could be brought up on the screen,
35 please. This document appears to refer to a conversation
36 that Mr Ward had with Mr Shimoon on 24 May of 2001; right?
37 A. Yes.
38
39 Q. He appears to be manoeuvring himself to ask for more
40 commission?
41 A. That is correct.
42
43 Q. In the second paragraph of the letter you refer to the
44 offer for business 24 January. That's the tender that
45 we've just been through, right?
46 A. Yes:
47

1 ... today the Euro has depreciated against
2 the USD close to 10 per cent. The end
3 result being that the price at which we
4 offered for this tender is particularly
5 unattractive with respect to current market
6 prices.

7
8 Right?

9 A. Yes.

10
11 Q. What you seem to be saying, and bear in mind here that
12 the offer was 865 Euros per kilogram, is that the offer is
13 now becoming an unattractive offer, that is a very cheap
14 offer?

15 A. Yes.

16
17 Q. One you would imagine the Iraqis would leap at, right?

18 A. I wouldn't imagine anything - I don't know. I
19 wouldn't speculate as to what the Iraqis would jump at.

20
21 Q.

22
23 We are prepared to wear the loss associated
24 with the weakening Euro and we would
25 appreciate if you could assist by
26 maintaining your commission at the
27 15 per cent as originally offered.
28 We hope you will understand that there just
29 isn't room for another 5 per cent
30 commission.

31
32 So Mr Shi moon seems to be requesting 20 per cent.

33 A. That's correct.

34
35 Q. And you or Mr Ward, on behalf of Alkaloids or APPC,
36 are saying, "Look, there's just no fat left in this deal,
37 we can't afford to pay you any more commission"?

38 A. That's right.

39
40 Q. Of course, the more commission you pay to Mr Shi moon,
41 the less return for Alkaloids, firstly; right?

42 A. That's correct.

43
44 Q. Ultimately, as we'll come to, the more commission you
45 paid to Mr Shi moon, the less commission you - that's APPC -
46 earned; right?

47 A. I hadn't thought of it in those terms, but that is

1 correct arithmetic.

2

3 Q. So you were most reluctant at this stage, having
4 already agreed with Mr Shimoon to pay 15 per cent at the
5 time that the tender was made, and having built that into
6 the price, to agree to any increase in the commission;
7 right?

8 A. That is correct.

9

10 Q. That's been documented in this letter of 24 May;
11 right?

12 A. Yes.

13

14 Q. It seems that Mr Shimoon wasn't content, and if you go
15 to AOA.0001.0630 you'll see there it would appear that
16 Mr Shimoon has come back to Mr Ward asking now perhaps a
17 counter offer, saying, "What about 18 per cent?", and
18 Mr Ward has responded saying, in effect, there's no room
19 for another 3 per cent commission; right?

20 A. Yes.

21

22 Q. So, again, this is consistent with you - that's APCC -
23 being reluctant to provide any further commission to
24 Mr Shimoon, you having already agreed to pay 15 per cent?

25 A. That's correct.

26

27 Q. And documenting that very discussion about the
28 commission, right?

29 A. Yes.

30

31 Q. Again, consistently with what you agreed to at the
32 very beginning of your testimony, you, as an experienced
33 trader, did endeavour to document those discussions you had
34 with your overseas agents in relation to commission; right?

35 A. I don't think we're doing that here. This is
36 commercial negotiations, but yes.

37

38 Q. You're putting it in writing, saying "We're not
39 prepared to agree" effectively; right?

40 A. At this particular stage, yes.

41

42 Q. Then if one goes to AOA.0001.0629, this would appear
43 to be the same document that's been faxed back by
44 Mr Shimoon back to Alkaloids with his handwritten notation
45 on it; correct?

46 A. I believe so, yes.

47

1 Q. I should have clarified this earlier, but you were -
2 that is, APPC - an agent for Alkaloids, but you used the
3 Alkaloids letterhead; correct?
4 A. Yes.
5
6 Q. When you were negotiating contracts or marketing and
7 the like, you would use the Alkaloids letterhead and your
8 telephone numbers and fax numbers?
9 A. That's correct.
10
11 Q. This sort of correspondence would not find its way up
12 to Kingaroy and the Crumptions; right?
13 A. Not in the normal course of events, no.
14
15 Q. Mr Shimoon said, "Sorry, Matt, I can't do any less
16 than 17.5%", and then there's a discussion consistent with
17 what you've already said in your evidence of Mr Shimoon
18 endeavouring to justify his commission by reference to the
19 expense of doing business in Iraq; right?
20 A. That's correct. You'll notice there's no suggestion
21 that he's paying the director in that particular claim.
22
23 Q. Nor is there any request by Mr Shimoon in that letter,
24 or indeed the earlier one, for some form of commission
25 other than a percentage commission, in this case 17.5?
26 A. That is correct.
27
28 Q. And it seems from the next document, AOA.0001.0627,
29 that you, to use the words in the letter, reluctantly
30 agreed to pay him 17.5 per cent; right?
31 A. Yes.
32
33 Q. Reluctantly because, as we've said, the more
34 commission you pay him, the less return to Alkaloids,
35 firstly?
36 A. Yes.
37
38 Q. And the less commission ultimately payable to you,
39 APPC?
40 A. I think, Mr Wigney, you should work out that my
41 commission of 2 per cent of 2.5 per cent is a relatively
42 small sum, so my motivation was entirely about the returns
43 to Alkaloids.
44
45 Q. Very well. In any event, you were unwilling to simply
46 meet whatever demands Mr Shimoon made for his commission;
47 right?

1 A. We as merchants - we are always negotiating for the
2 best price for our principals and this is an example of
3 that, yes.

4
5 Q. You had a bit of, if I might use the word, argy-bargy
6 about his commission and you ultimately struck a deal at
7 17.5 per cent; right?

8 A. This is the deal that Mr Ward dealt with him,
9 yes - that was communicated to him, yes, that's right.

10
11 Q. This correspondence bears Mr Ward's name. It's
12 likely, isn't it, that he would have discussed these
13 matters with you, you being his boss?

14 A. Yes, he would have.

15
16 Q. You would have been aware this was going on, right?

17 A. Yes.

18
19 Q. Regarding that agreement to pay him 17.5 per cent
20 commission - that's an increase of 2.5 per cent - he
21 requested again a formal letter confirming that that was
22 the case, did he not?

23 A. I don't recollect it. I would have thought that email
24 there, that fax there, would have satisfied that, but maybe
25 there is another letter.

26
27 Q. Well, if you go, please, to AOA.0001.0614, this is a
28 letter sent to Mr Shimoon at his Canadian address.

29 A. Yes.

30
31 Q. Confirming that the tender price for the supply of
32 1,000 kilos of hyoscine - that's a reference, is it not, to
33 the 24 January tender that we've referred to?

34 A. Yes.

35
36 Q.

37
38 ... 17.5 per cent commission for yourself.
39 The commission will be transferred to you
40 immediately upon receipt of cleared funds
41 from the letter of credit.

42
43 Right?

44 A. Yes.

45
46 Q. It would seem from that that Mr Shimoon has requested
47 you, consistently with what he had done in the past, to

1 confirm the commission arrangements in writing --
2 A. Yes.
3
4 Q. -- and send it to his Canadian address; right?
5 A. Yes, that's right.
6
7 Q. So we have the position that at 2 July 2001 you've
8 confirmed in writing 17.5 per cent as a result of this
9 argy-bargy that you've just spoken of; right, is that
10 correct?
11 A. Yes.
12
13 Q. And we have, some 17 days later, the contract of
14 19 July 2001 for the sale of the 1,000 kilos of hyoscine;
15 right?
16 A. Yes.
17
18 Q. As I understand the evidence in your first
19 statement - and you referred to it in your oral testimony
20 this morning - it is that you recollect there being some
21 discussion and agreement between the date of this letter,
22 2 July, and 19 July, whereby you agreed to pay Mr Shimoon
23 some more commission?
24 A. That's correct.
25
26 Q. In a nutshell, your agreement, you say, was that
27 Mr Shimoon would be entitled, if the contract was
28 fulfilled, to any amount received under the contract which
29 was above the tender price of 865 Euros per kilo?
30 A. Yes.
31
32 Q. As I understand it, Mr Joyce, you can't recall when
33 that conversation or agreement occurred, other than it must
34 have been between those two dates?
35 A. Yes. I think since issuing my statement - and I
36 obviously have focused on this matter a lot more - I think
37 the sequencing is that somewhere between 2 July and when
38 we - see, at this stage we were unaware that the contract
39 had been concluded. Albert is telling us he thinks he's
40 got it, but it doesn't happen. It's somewhere between that
41 date and when he did tell us he had the contract Shimoon
42 spoke to me, or I spoke to Shimoon. He had been dealing
43 with Matt. I suspect I was not in the office at the time,
44 in the time that that argy-bargy was taking place, that I
45 was travelling or somewhere, but, I agree, I would have
46 been informed by Mr Ward of what was going on. He and I
47 would have spoken daily by phone and I would have known all

1 about that. But I did not speak to Shimon. I
2 recollect speaking - now tend to recollect speaking to
3 Shimon in that period. Shimon has complained that this
4 terrible fellow Matt wouldn't give him any more commission
5 and I've said, "Well, we can't." He's gone and told me
6 about all his expenses again and the hotel bills and the
7 trips to Baghdad, et cetera. And it's in that period of
8 time that I - he's said, "What if I can get above that
9 price?", and I said, "Then it's all yours". It's in the
10 context of him coming back to me, or I went to him, we had
11 a discussion somewhere between that date which involved he
12 spoke to me, not Matt Ward.

13
14 Q. But you see you, not Mr Ward, have confirmed on 2 July
15 2001 that it's the 17.5 per cent commission; right?

16 A. That's correct.

17

18 Q. There's nothing to suggest in that letter that he
19 requested anything more than 17.5 per cent; right?

20 A. Well, there is. He certainly did suggest he wanted
21 more than that because he wanted 20. This is the
22 conclusion of that round of discussions, yes.

23

24 Q. But the conclusion of that round of discussions where
25 he was opining about his expenses and the like, the
26 conclusion was you reluctantly agreeing to pay
27 17.5 per cent; right?

28 A. That's correct.

29

30 Q. You, not Mr Ward, have written this letter of 2 July?

31 A. I've signed this letter, that is my signature, and
32 I've signed it, yes. Now, it almost certainly was prepared
33 by Mr Ward. I'm not trying to blame Mr Ward. That's my
34 signature. There's no question that I - that's what we
35 were at that time. But I suspect I had not communicated
36 personally with Shimon in that period. It was after that
37 period that I personally spoke to Shimon.

38

39 Q. Is it your evidence that you now recall this
40 conversation, or are you reconstructing it or speculating
41 about it?

42 A. I can't specifically tell you - I didn't take a diary
43 note of it. I can't tell you exactly when that
44 conversation happened. I can't be precise about it, but
45 that is what I think happened. But I do recollect that
46 Shimon was saying to me, "Oh, Matt Ward won't agree to
47 this. Chris, you've got to look after me. I can deal with

1 you. This guy, Matt Ward, he's a really tough guy and I
2 can't get any more than that", and I confirmed the
3 17.5 per cent. He came back with the suggestion about,
4 "What if I get a higher price?", and I agreed to it.

5

6 Q. In your statement that you initially prepared for the
7 inquiry you say this on page 10, in paragraph 21, in the
8 third paragraph, barcode reference AOA.0007.0012:

9

10 At some time prior to 19 July 2001 I also
11 agreed with AS that he would be entitled,
12 if the contract were fulfilled, to any
13 amount received under the contract above
14 the tender price of Euros 865. I cannot
15 now recall exactly when this was, nor the
16 circumstances in which I agreed to this,
17 but it is likely to have been earlier in
18 our discussions rather than later.

19

20 Then you refer to such arrangements not being common. Now,
21 are you saying that this recollection that you've given in
22 your oral evidence this afternoon has been something that's
23 emerged since you prepared this statement?

24

25

26 A. Yes.

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1 A. No, there's not.

2

3 Q. So, unlike all of the other discussions that you've
4 had with Mr Shimon about his commission, you have not
5 confirmed it in writing in any way --

6 A. Well, we did.

7

8 Q. -- at the time or around the time that it was made?

9 A. No, it doesn't, but overpricing is a relatively not
10 uncommon part of our business. It's not something I would
11 need to document to correct my memory, because the tender
12 documents are very clear what the price was, so whatever
13 the contract is, it's very clear what the difference is.
14 As you've already noted, my day book is not a complete
15 record of my life.

16

17 Q. You see, Mr Joyce, even in relation to relatively
18 small movements in the percentage of commission, that is
19 from 15 to 17.5 per cent, or the like, in the past you have
20 always documented that in a letter to Mr Shimon, haven't
21 you?

22 A. Well, we documented the final figure relatively soon
23 after the contract was concluded.

24

25 Q. I'll come to that letter in due course, or what you
26 suggest is --

27 A. I'm suggesting that's when we documented it.

28

29 Q. We'll come to that in a moment --

30

31 THE COMMISSIONER: We should maybe go and have some lunch
32 in a moment. Is that a convenient time?

33

34 MR WIGNEY: It's certainly a convenient time.

35

36 THE COMMISSIONER: We'll adjourn until 2 o'clock.

37

38 LUNCHEON ADJOURNMENT

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UPON RESUMPTION:

MR WIGNEY: Q. Mr Joyce, immediately before the luncheon adjournment I was asking you some questions about your evidence about your discussions with Mr Shimoon about what I will call the overprice commission; do you understand?

A. Yes.

Q. I think your evidence was, in general terms, that your recollection is that the discussion you had with him now concerned or related to the fact that, because you hadn't agreed to increase his commission to 18 or 20 per cent, this was the next best thing - the overprice commission was some form of compromise.

A. Yes, I think that's what happened, Mr Wigney. I think that's what happened. I think so.

Q. You can't put it any higher than you think?

A. Correct. I can recollect it happening. The exact time it happened, I can't be absolutely certain. My best recollection is that it happened in that period between after we had concluded the argy-bargy on the increased commission and being advised of what the final price of the contract was, but I can't be absolutely precise. It is possible I mentioned that to Shimoon at some earlier time, that, in principle, we will pay overprices. It's possible he asked me that some time before. I can't be sure.

Q. You see, the dates that you put it at are logical, if I might say so with respect, because at the first date, at the end of what you call the argy-bargy, you have a letter of 2 July which confirms 17.5 per cent and nothing more; correct?

A. Correct. Well, at that stage there wasn't anything more, to my knowledge.

Q. And the end period that you have put as the likely time for this conversation is the date that you were advised of the contract figure, which I think you put at 20 July - that's the day after the actual contract was signed; right?

A. Yes.

Q. And obviously it didn't occur after that, because no doubt if you had been told what the contract figure was, you wouldn't have agreed to any overprice; correct?

1 A. That's probably correct, Mr Wigney.
2
3 Q. So the likelihood is that it did - if it occurred?
4 A. Yes, that is the likelihood, but it is not the
5 certainty.
6
7 Q. Of course, if the offer that had been put was the
8 offer of 865 Euros per kilogram, and it was accepted, there
9 would be no overprice, so there would be nothing for
10 Mr Shimoon to gain by this agreement; right?
11 A. Correct.
12
13 Q. That is, there is no overprice, he doesn't get
14 anything in addition to his 17.5 per cent?
15 A. That's correct.
16
17 Q. When this overprice commission was suggested to you,
18 did you say, "Listen Albert, if we're going to talk about
19 overprice commission, are you going to tell me whether you
20 have put a price over 865 Euros per kilo?
21 A. No.
22
23 Q. Did you ask him whether it was likely that he would
24 get over 865 Euros per kilo?
25 A. No, I don't recollect I would have done that.
26
27 Q. Because, of course, if you didn't put those questions,
28 you would have no way of knowing what potentially you would
29 be paying to him under this overprice commission agreement;
30 correct?
31 A. No, I wouldn't have known.
32
33 Q. If you had asked him, "Well, listen Albert, what are
34 you likely to get if you put something higher than 865",
35 then you could have ascertained what potentially you would
36 have been up for in relation to overprice; right.
37 A. Well, I suppose if I had asked him that question
38 I would have known, yes, but I didn't put that question to
39 him.
40
41 Q. It would have been an entirely logical and prudent
42 question to put to him in the circumstances, wouldn't it?
43 A. No, not necessarily. I don't need to know.
44
45 Q. But by agreeing without asking him those questions,
46 you have no idea and no control over what amount you would
47 be paying him under the agreement that you made; right?

1 A. That's correct.
2
3 Q. And yet you didn't ask him anything?
4 A. No, I didn't.
5
6 Q. Potentially, it could have been a very large figure if
7 he got a higher price than this 865 Euros?
8 A. Yes, it certainly would have been a large figure.
9
10 Q. Indeed, that's what turned out to be the case in due
11 course; right?
12 A. Yes; that's correct.
13
14 Q. What you were doing by entering into this agreement
15 that you tell us you entered into was to really put the
16 amount of commission payable to Mr Shimon entirely out of
17 your hands, wasn't it?
18 A. I - yes, you could - you can construe it that way
19 today, yes.
20
21 Q. It certainly gave Mr Shimon an incentive to try and
22 negotiate a much higher price, didn't it?
23 A. Yes, it certainly would have.
24
25 Q. And yet if he did negotiate a higher price you would
26 not get the benefit of it at all?
27 A. That's correct.
28
29 Q. It was hardly a very prudent or sensible agreement to
30 be entering into at the heel of the hunt - that's just
31 before the contract was awarded - was it?
32 A. It is in Alkaloids' interests to have agents who are
33 working keen and hard on our behalf to make sales at price
34 levels which return a reasonable result to us. If that
35 agent is able to increase their own incentive, that means
36 that they will work harder for us and hence we will get
37 more business in the long term. That is the company's
38 policy; it has been for some time. But you are dealing
39 with this specific case and I am answering you in the
40 general terms. In the general terms, when it comes to
41 overprices, it is not my practice to get involved in a
42 particular way. If our agents make some money, we will
43 make some money.
44
45 Q. I see. This was, you would agree, certainly a pretty
46 significant agreement you were entering into with
47 Mr Shimon about his commission, wasn't it?

1 A. In the terms of the final magnitude of it, it turned
2 out to be so, but when I made the agreement I was unaware
3 of that, and the fact that it turned out - this overprice
4 turned out to be substantially larger than I would have
5 expected I just regarded as smart work by Albert, nothing
6 more or less. In principle, it is opportunity. We
7 actually have another case where the magnitude is almost
8 exactly the same, in another totally different market. It
9 is not out of the realms of possibility. It is certainly
10 at the top end of what I would expect, but it is not
11 impossible.

12
13 Q. I see. But yet, putting aside the July letter that
14 you have referred to - and I will show it to you in a
15 moment so we are clear what we're talking about - you can't
16 point to a single piece of paper that records this
17 agreement contemporaneously, can you?

18 A. There is a large - the short answer to your question
19 is no. There is also a large number of other events that
20 have happened in this transaction and other parts of my
21 business where I can't produce a piece of paper for your
22 satisfaction or anyone else's, for that matter.

23
24 Q. But this is a particularly significant and important
25 part of your transaction with Mr Shimon and you can't
26 produce a piece of paper; that's right, isn't it?

27 A. Well, I don't agree with that. I don't agree that
28 this is a particularly important part of the transaction.
29 It is something that I remembered quite clearly - it is an
30 easy thing to do, yes, I have agreed with that in
31 principle. It is very easy to reference what the two
32 prices are. You don't need a confirmation in writing to do
33 it. I remembered it. The day books were there as memory
34 prods for the short term. They weren't there as a
35 documentary record of the activities of the business.

36
37 Q. There is no note in your day book?

38 A. No.

39
40 Q. There is no letter or other form of written
41 correspondence from Mr Shimon requesting this form of
42 commission?

43 A. Correct.

44
45 Q. There is no letter from you prior to 19 July, when the
46 contract was entered into, confirming the terms of this
47 agreement?

1 A. That's correct.

2

3 Q. Have you any explanation for the absence of any
4 document in relation to this agreement?

5 A. No, I have no explanation for any document that is
6 missing in anything that we have presented to you, but we
7 have already confessed that there are documents missing
8 because the documentary records of our organisation are not
9 perfect.

10

11 Q. Is this a possible explanation for the absence of such
12 a document, Mr Joyce, that, in truth, there was no
13 agreement between you and Mr Shimon to pay him a
14 commission based on overprice; is that a possibility?

15 A. No. It is not a possibility. We paid it to him.

16

17 Q. Is an explanation that the agreement you entered into
18 with Mr Shimon was that you - that is, APPC, or Alkaloids,
19 would pay to him money to reimburse him for payments that
20 he had made so as to secure the contract; is that an
21 explanation?

22 A. Not that I'm - not that, at that time, I was aware of.

23

24 Q. Because, of course, if there were an agreement to that
25 effect, it is not something that you would wish to record
26 on your files or in your day book; that's right, isn't it?

27 A. Mr Wigney, that question is asked in the light of
28 2006. In 2001 and 2002 I knew nothing about any of these
29 arrangements that were going on with the Iraqi government.
30 I never suspected them. I never knew anything about them.
31 Why would I would or wouldn't not write it down in my day
32 book? I wasn't trying to hide anything in my day book
33 because I didn't know that there was anything to hide.

34

35 Q. Very well. Moving on, then, Mr Joyce, as I think you
36 have already agreed, and you have put in your statement,
37 you were advised, I think by Mr Ward on or about 20 July,
38 that he, Mr Ward, had been contacted by Mr Shimon and
39 advised that the contract price was the tendered-for amount
40 plus 90 Euros per kilogram; is that right?

41 A. Yes.

42

43 Q. I am going to take you to that note shortly, but,
44 before I do, can I take you to a different note. Can I ask
45 you this, firstly: your observation of Mr Ward's practices
46 was that he also made entries in the day book; correct?

47 A. Yes.

1
2 Q. And that was something that you, as his boss,
3 encouraged him to do; right?
4 A. Yes.
5
6 Q. To record contemporaneously his dealings and
7 discussions with the various contacts, including overseas
8 agents; right?
9 A. Yes.
10
11 Q. Can I take you to this note, please. It commences at
12 AOA.0002.0994. Again, that is not a tremendous copy, but
13 if you need access to the original day book I will
14 endeavour to provide it. You will see, on this first page,
15 the date at the top, 4 July 2000. So that's before you
16 proceeded?
17 A. It is 2001, I think, sir.
18
19 Q. 2001. I am sorry.
20 A. Yes.
21
22 Q. That is before you had been notified of the contract
23 price by Mr Ward on 20 July, just to put it in context?
24 A. Yes.
25
26 Q. You will see a reference, a subheading there to
27 AS International on the second paragraph?
28 A. Yes.
29
30 Q. I don't want to take you to anything there. Again,
31 there is another subheading at the bottom, "AS
32 International", and reference to shipping documents; do you
33 see that?
34 A. Yes.
35
36 Q. I want to take you over the page. You will see that
37 there is a reference to "Abdel Hak". Is that a name that's
38 familiar to you?
39 A. I believe he was one of the potential shipping agents
40 that Shimon recommended that we use to get the goods to
41 Samara.
42
43 Q. Then there is a reference to some, consistent with
44 what you have said, shipping aspects. Then we have a note:
45
46 AS leaving 10 July to Baghdad to sign
47 contract.

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Do you see that?

A. No. Yes, sorry, yes, I do now.

Q. Now, that would suggest, perhaps, that some agreement had been struck as early as 4 July in relation to the matter, because Mr Shimoon is going over to sign the contract; would you agree with that?

THE COMMISSIONER: Q. 10 July?

A. Mr Shimoon advised us prior to him going to Baghdad - and I don't know whether it was the 4th, but it was before he went to Baghdad - that he was confident that he had the business but he had to go to Baghdad to conclude it. So, at that stage, he was giving us what we call in the trade a positive stall.

MR WIGNEY: Q. Right. Then there is, "authentication takes time"?

A. Yes.

Q. Then it is the next line I want to direct your attention to:

10% will need to be done when...

Do you see that?

A. Yes.

Q. I accept this is not your note, but did Mr Ward ever tell you anything about a discussion he had with Mr Shimoon about the need for a 10 per cent payment of some sort?

A. No.

Q. Did you know as at this time, or did Mr Ward tell you, that Mr Shimoon had told him that the contract price would be 10 per cent higher than the tender?

A. No.

Q. We know, of course, that that was the case?

A. Yes.

Q. Does any of that refresh your recollection about a discussion with Mr Ward to that effect?

A. I don't recollect any conversation about that at all.

Q. Very well. We can do this fairly quickly, I want you

1 to identify the contract. It is at AOA.0001.0347. That's
2 the contract between Alkaloids and the State Company For
3 Manufacturing Drugs and Appliances. You will see at
4 point 8 what is described as the total value is 955,000
5 Euro?

6 A. Yes.

7

8 Q. You, in due course, came to see this document?

9 A. Yes.

10

11 Q. As we have said, your evidence is that on 20 July
12 Mr Ward told you that he had been contacted by Mr Shimoon
13 and advised about the contract price; right?

14 A. Yes.

15

16 Q. If you can go, please, to Mr Ward's note about that,
17 it is at AOA.0002.1032. On that first page I don't want to
18 direct your attention to anything in particular other than
19 the date. There is a reference to AS International at the
20 bottom. That would seem to simply record something about
21 provision of the document by DHL courier, or some documents
22 by DHL courier?

23 A. Yes.

24

25 Q. It then goes over the page, there is a reference to
26 Alkaloids at the top, then Woolworths and another
27 subheading "AS International", and "Albert".

28 A. It is now upside down.

29

30 Q. There is a reference "Word and Excel to open". Now,
31 just dealing with that, Mr Shimoon on occasion sent you
32 Word or Excel documents to open that contained relevant
33 documents; is that right?

34 A. Yes, usually they were on a disk and they were the
35 tender documents that came out from the Iraqi companies,
36 yes.

37

38 Q. There is another reference to the IKE Courier --

39 A. Yes.

40

41 Q. --"to send". But then the words I wanted to direct
42 your attention to are, "Signed commitment + E 90"; do you
43 see that?

44 A. Yes.

45

46 Q. I think you agreed earlier, the way that the price was
47 always described was the tender price of 865, plus

1 90 Euros; right?

2 A. Yes.

3

4 Q. Now, these words - and I appreciate it is not your
5 note, it is Mr Ward's - suggest, do they not, that the
6 Iraqis had signed a commitment to pay what was in the
7 tender together with another 90 Euros?

8 A. My understanding of that is that the Iraqis had agreed
9 to pay 955, which was the tender price plus 90 Euros, yes.

10

11 Q. There is a reference in the next subheading to "CBA",
12 and "Westpac". Are you able to indicate whether they have
13 anything to do with this particular matter?

14 A. Do you have access, sir, to - they presumably relate
15 to the shipping file. That number, next to Westpac, is a
16 shipping file number. I don't know what the shipping file
17 number is for this contract. Is it 089?

18

19 THE COMMISSIONER: It probably is, because the following
20 entry plainly relates to this transaction.

21

22 THE WITNESS: No, it is not. The Iraqi contract is 083.

23

24 MR WIGNEY: Q. Under the heading "CBA" --

25 A. I assume that that's got nothing - I doubt - I assume
26 that's another ship file, sir. The ship file for Iraq is
27 A01/083.

28

29 THE COMMISSIONER: Q. The next entry deals with shipping
30 and it deals with contract price and it deals with the
31 17.5 --

32 A. I am sorry, Commissioner, I can't hear you.

33

34 Q. The next entry deals with shipping, it deals with the
35 contract price?

36 A. Yes.

37

38 Q. It deals with the 17.5 per cent?

39 A. Yes.

40

41 Q. So it would seem to me improbable that the entry in
42 the middle doesn't also relate to this transaction in some
43 fashion, if it matters.

44 A. Well, sir, I am quite happy to provide you with the
45 documents relating to A01/089, and I think almost certainly
46 it will come up with the invoice value to that customer was
47 \$8,118. I am quite happy to provide that to clarify that

1 for you.

2

3 THE COMMISSIONER: Thank you.

4

5 MR WIGNEY: Q. I think the next subheading reads "CJ" -
6 that's your initials --

7 A. Yes.

8

9 Q. -- suggesting perhaps Mr Ward was discussing the next
10 matter with you?

11 A. Yes.

12

13 Q. "When to ship", as the Commissioner observed, and then
14 865 - now, that's the tender price, and commission of 17.5?

15 A. Yes.

16

17 Q. May we take it that when you were advised by Mr Ward
18 of this price of 955 Euros per kilo, making a total price
19 of 955,000 Euros for the contract in total, you were fairly
20 ecstatic - it was a very significant increase in the price
21 that you had proposed; correct?

22 A. I was surprised at the size of it. I wasn't ecstatic.
23 I was pleased that we had concluded the business with Iraq,
24 but I never at any stage thought that we were getting any
25 of that 90.

26

27 Q. No, but for the --

28 A. So, therefore, I wasn't ecstatic about the price, no.

29

30 Q. But for the so-called overprice agreement with
31 Mr Shimoon, Alkaloids would have been handsomely rewarded
32 by this significant contract price; right?

33 A. I'm not sure I understand the question.

34

35 Q. Well, you got a price that was 10 per cent higher than
36 what you had expected to get in your tender offer; right?

37 A. Well, we never got that on a net basis and we never
38 expected to get it on a net basis, so we never thought that
39 we had the 965 - 955.

40

41 Q. But for the overprice agreement that you say you
42 entered into with Mr Shimoon shortly prior to this
43 contract, you would have - you, Alkaloids - received a
44 significantly larger return than you were now that you had
45 entered the overprice agreement; right?

46 A. Well, mathematically that's correct.

47

1 Q. Were you upset at the fact that Mr Shimoon had
2 managed, at the heel of the hunt, to extract this
3 additional commission from you?

4 A. I was indifferent to that. I was impressed that he
5 did it, but it didn't upset me, concern me. I didn't think
6 I had lost anything. It wasn't anything I had lost.
7

8 Q. What was your attitude to the deal that had been
9 struck by Mr Shimoon on your behalf? Were you satisfied
10 about it? Were you dissatisfied? Did you think it was a
11 good deal?

12 A. Reasonably - it was a good deal - reasonable. It was
13 a reasonable deal. I think that what you will find is
14 Mr Ward's remark there about the 740 is that that's the US
15 dollar equivalent of the 865, using your exchange rates of
16 earlier today. That's about the right price. So we would
17 have been getting about US\$740, which was, you know,
18 reasonable.
19

20 Q. Can I take you to, next, please, to this document,
21 AOA.0001.0375. Now, as I understand your evidence so far,
22 it is this letter that you suggest documents in some way
23 the overprice agreement that you entered into with
24 Mr Shimoon; is that right?

25 A. No, that document relates to offers for future
26 tenders.
27

28 Q. I see.

29 A. Other than phase IX.
30

31 Q. This one talks about, in terms, the phase IX
32 contract - that's the one that we have been discussing in
33 evidence; right?

34 A. Yes.
35

36 Q. And it suggests, in the second paragraph, that you
37 have lost on the phase IX contract because of the decline
38 in the Euro?

39 A. That's correct.
40

41 Q. But if you had lost on the phase IX contract, the only
42 cause of that loss was the overprice agreement you say you
43 entered into with Mr Shimoon - that's right, isn't it?

44 A. No.
45

46 Q. Well, if it had been at 955 Euros per kilo - 965 Euros
47 per kilo - and you - that is, Alkaloids, or APPC - were

1 entitled to all of the sale proceeds, it would have been a
2 very handsome contract, would it not?

3 A. Yes, but we weren't. We weren't entitled to the 955.
4

5 Q. But you see you complain about the loss on the
6 phase IX contract as a result of the decline in value of
7 the Euro?

8 A. Yes.
9

10 Q. You don't complain to Mr Shimon that you have lost on
11 the contract because of the overprice agreement, do you?

12 A. Mr Wigney, you referred to earlier today my long
13 career as a merchant. One of my, I think, claims to fame
14 in this industry is I stand by my word, and regardless of
15 whether a deal goes well or goes badly, short of
16 bankruptcy, we will honour the contract, and the
17 arrangements I came to with Mr Shimon were 865 including
18 17.5 plus the overprice. That was the commitment that
19 I had made to Mr Shimon. So we were going to honour that,
20 short of bankruptcy of the company, and we are not talking
21 about that at all. So we were going to honour the
22 contract. We have got deals in which currency has gone
23 well for us, currency has gone badly for us - we will
24 honour it, full stop, end of sentence.
25

26 Q. I am not, and have not suggested to the contrary,
27 Mr Joyce. What I am suggesting is that if, as you suggest
28 in the second paragraph of this letter, you had lost on the
29 phase IX contract, it had nothing to do with the decline in
30 the Euro, it was because you had agreed with Mr Joyce to
31 forfeit the overprice to him; right?

32 A. No, our offer was 865. That's what he got. And then
33 he got some more for himself. Congrats - that's his good
34 fortune. It's not my opportunity loss; I don't see that as
35 a loss at all.
36

37 Q. I see. Here is another opportunity where you could
38 have referred to the so-called overprice agreement, but you
39 didn't; right?

40 A. It wasn't necessary to do it because I didn't try and
41 renegotiate the 17.5 per cent either, because that was
42 agreed. Now, if I were to say, "Hey, Albert, you should
43 give me back some of the 90", or, "You should give me back
44 some of the 17.5 per cent", then I am renegotiating the
45 contract, and that's what I normally, as a practice, don't
46 do.
47

1 Q. You have referred to a letter that you say documents
2 in some way the overprice agreement. Can you give us the
3 date that you understand that letter to be?

4 A. Sitting here now, no, but it was a - it is a letter to
5 Shi moon which says that we would pay him some 240,000
6 Euros, in approximate numbers.

7
8 THE COMMISSIONER: Q. One that says, "Here is your small
9 fee", or words to that effect?

10 A. Yes - "modest", I think I used.

11
12 MR WIGNEY: Q. That's the letter you say?

13 A. Yes.

14
15 Q. That simply documents you paying him a sum of money,
16 doesn't it? It doesn't actually document how you come to
17 agreeing to pay that money?

18 A. That's correct, no, it is the total sum of money, yes,
19 that's right.

20
21 Q. So that's the only piece of paper that you have been
22 able to find that you say refers in any way to this
23 overprice commission agreement; is that right?

24 A. Yes. I believe that's the case. I think that
25 document appears in the file several times, but it is
26 fundamentally the same document.

27
28 Q. I will bring it up so that there is no
29 misunderstanding about it. Just bear with me for a moment.
30 I will see if I can locate it. It is AOA.0001.0222. Is
31 that the document you are referring to?

32 A. Well, that's the email that - no, I don't think so,
33 sir. There is an email which is - there is a letter which
34 actually specifies the sum of money of 240,000-something
35 Euros. I think that's simply an acknowledgment of Shi moon
36 sending us his banking details in anticipation that - oh,
37 this is July 2002.

38
39 Q. In any event, we will move on.

40 A. That document was much earlier than that, sir. It was
41 some time in 2001. I can't remember when, but it was in
42 2001. This is about the time of the shipment and in
43 expectation of him getting his commission.

44
45 Q. While we have got that document there, let me ask you
46 this: you were plainly being facetious when you referred
47 to his modest charges, were you not?

1 A. Yes.
2
3 Q. Because, as we know - and I will come to the precise
4 detail in due course - his modest charges exceeded \$400,000
5 Australian, didn't they?
6 A. Yes.
7
8 Q. Almost a quarter of the overall sale proceeds from the
9 contract?
10 A. Yes.
11
12 Q. Before we move on I should, although I will endeavour
13 to deal with this in short form, deal with what occurred in
14 relation to the UN approval process; do you understand?
15 A. Yes.
16
17 Q. I asked you at the very beginning of your testimony
18 about your understanding of the approval process under the
19 Oil-for-Food Program?
20 A. Yes.
21
22 Q. You agreed that it involved, at the first instance,
23 providing to the Department of Foreign Affairs and Trade a
24 UN notification form --
25 A. Yes.
26
27 Q. -- together with a copy of the contract; right?
28 A. Yes.
29
30 Q. And, as you recollect it, you personally attended to
31 that matter?
32 A. It was done under my - or I did it - it was done under
33 my supervision, at least. I either did it or I agreed with
34 what was done.
35
36 Q. We will just go through these documents quickly for
37 you to identify them. If we go to AOA.0001.0444, can you
38 identify that as the notification or request to ship goods
39 to Iraq, being the UN form that you submitted to the
40 Department of Foreign Affairs and Trade?
41 A. Yes.
42
43 Q. As you understood it, the system was that the UN would
44 not communicate directly with a company such as yourself;
45 you had to do it through the Department of Foreign Affairs
46 and Trade?
47 A. That's true.

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Q. And the system was you would send it to the department in Canberra, they would send it to the Australian mission in New York?

A. Yes.

Q. And that was the way communications went; is that right?

A. Yes.

Q. As you recollect it, together with that form, did you provide to the Department of Foreign Affairs and Trade a copy of the contract which you identified earlier?

A. Yes.

Q. Again, I will take you to these documents if needs be but I don't think much turns on them, but did you receive notification in August of 2001 that your - that is, Alkaloids' - application for approval had been put on hold as a result of some actions by the United States mission to the United Nations?

A. Yes.

Q. That was about some concerns about the use to which the hyoscine product could be put?

A. That's correct.

Q. In short, it seems there were some concerns about whether it had something to do with nerve gas or an antidote to nerve gas; is that right?

A. That's correct.

Q. You, in due course, corresponded at some length with the United Nations via the Department of Foreign Affairs and Trade; is that right?

A. Yes.

Q. And ultimately that hold was lifted at the end of November or early December of 2001?

A. Yes.

Q. And Alkaloids received approval via the UN some time in about mid December 2001?

A. Yes.

Q. There were then, sadly for you, some further delays occasioned because, perhaps as a result of the delays

1 occasioned by the US action, the funds in phase IX of the
2 program had dried up; is that correct?
3 A. Correct.
4
5 Q. There was again voluminous correspondence between
6 yourselves and the department and the United Nations about
7 that particular issue?
8 A. Yes.
9
10 Q. And that, in due course, also was resolved some time
11 in 2002; is that right?
12 A. Yes.
13
14 Q. And funds, as a result of matters that we need not go
15 into, became available for your contract; right?
16 A. Yes.
17
18 Q. I just want to ask you about one other note that
19 I think has received some attention in your statement that
20 you signed and furnished today. It is a note from your day
21 book. If you bear with me one moment I will get the
22 reference. It is AOA.0002.0313. You identified the
23 writing on this page as your writing?
24 A. Yes.
25
26 Q. It has come out of one of your day books?
27 A. Yes.
28
29 Q. It is dated 7 September 2001. It deals with a number
30 of matters relating to banking, it seems?
31 A. Yes.
32
33 Q. There is a name "Tony Hewish, CBA". Is that someone
34 you dealt with at the Commonwealth Bank?
35 A. Yes, in the trade department.
36
37 Q. There is a reference:
38
39 Need a document
40 Assignment of Proceeds cost \$100
41 Letter from the CBA.
42
43 A. Yes.
44
45 Q. I think in your third statement, the one you have
46 signed today, you explained that an assignment of proceeds
47 is an undertaking by a bank to direct the proceeds of a

1 planned receipt in a particular direction, with a further
2 undertaking that the bank will not alter those directions
3 without confirmation of all the parties?

4 A. Yes.

5

6 Q. Did that discussion in relation to the assignment of
7 proceeds have to do with this - that Mr Shimoon wanted you
8 to agree to assign the proceeds of the letter of credit, or
9 at least a portion of the proceeds, referable to the
10 commission payable to him, assigned directly to his bank
11 account?

12 A. Yes.

13

14 Q. You had some dealings with the Commonwealth Bank in
15 relation to that issue?

16 A. Yes.

17

18 Q. And, in due course, that was in fact effected - that
19 is --

20 A. No. It was never executed at all.

21

22 Q. I see.

23 A. Shimoon asked for one. We found out what it was, but,
24 for reasons - I can't remember, and since this has been
25 raised yesterday by counsel - my counsel - I haven't had a
26 chance to go back to the bank and ask them. But there was
27 some problem in the way that such a document had to be
28 executed, and Shimoon had some problems doing that, and I
29 can't remember what that was, but the end result is there
30 was never an assignment of proceeds executed at all on this
31 transaction at any time.

32

33 Q. I see. What I was perhaps thinking of - and I will
34 take you to the document whilst we are dealing with it; it
35 is at AOA.0001.0159 - is a Commonwealth Bank document dated
36 13 August 2002?

37 A. Yes.

38

39 Q. It is addressed to Alkaloids. If we just go down to
40 the details, it talks about "LC" - that's letter of credit
41 - principal, credit for the sum of 955,000 Euros - that's
42 the sale proceeds from the contract?

43 A. Yes.

44

45 Q. And then there is a reference to "Split pay"?

46 A. Yes.

47

1 Q. "243,175 Euros". That's Mr Shimon's payment; right?

2 A. Yes.

3

4 Q. And that was automatically directed into his bank
5 account?

6 A. It wasn't automatically directed; it was directed
7 because we told the bank to so direct it.

8

9 Q. Right. So that's not the --

10 A. That's not as a result of an assignment of proceeds
11 certificate. It was done because at the time that the
12 letter of credit was negotiated we instructed the
13 Commonwealth Bank what to do with the proceeds at that
14 moment, which was, if I'm not wrong, around the end of July
15 2002. So we did not execute what is called an assignment
16 of proceeds. We certainly agreed with Shimon that we were
17 going to pay him the money, and we did pay him the money,
18 but we didn't go through something called an assignment of
19 proceeds, which is a particular bank document.

20

21 Q. If we can then just go back to the note that I was
22 asking about before, AOA.0002.0313, the matter that
23 I particularly wanted to direct your attention to is not
24 the assignment of proceeds note but what follows, the word
25 "Albert", then you have "LC 90", and under that a notation
26 for Euros 90. I think the next word is "through" - are you
27 able to assist with that?

28

29 THE COMMISSIONER: "Opening".

30

31 THE WITNESS: "Opening".

32

33 MR WIGNEY: Q. Under the 90, to the left of "Rafadin"?

34 A. I think it is "true".

35

36 THE COMMISSIONER: Q. I read it as "LC 90 opening to
37 Iraqis guaranteeing the Euro 90" something or other?

38 A. "Through". I think that's "through".

39

40 Q. "Through Rafadin Bank - no-one", and then the figures
41 you can see.

42

43 MR WIGNEY: Q. Do you recall having a discussion with
44 Mr Shimon in relation to those matters that you have noted
45 in your day book?

46 A. Not particularly.

47

1 Q. You have agreed in your statement that you signed
2 today, at the foot of page 5, that the "LC90", read with
3 2006 eyes, may well be a mention of a guarantee that AS -
4 that's Mr Shimoon - had given to the Iraqi government to
5 pay to it an amount of 90 Euros per kilo. That's so, is
6 it?

7 A. That's how I - that's how I read it today, yes.

8
9 Q. Do you recall having any discussion with Mr Shimoon
10 about requesting or requiring a guarantee to pay the Iraqi
11 90 Euros?

12 A. No, I don't, Mr Wigney. I really don't.

13
14 Q. Do you remember having any discussions with him about
15 the Al Rafidain bank?

16 A. No, until I read this yesterday, I would have quite
17 happily given you on oath that I had never heard of the
18 Rafidain Bank. I wouldn't do that today.

19
20 Q. Well, I think you may be aware, Mr Joyce, that the
21 inquiry has received information to the effect that,
22 firstly, the Al Rafidain Bank is a bank in Jordan and that
23 a number of Iraqi ministries had bank accounts with it; do
24 you understand?

25 A. I hear what you are saying, yes.

26
27 Q. You are aware of that?

28 A. Not particularly, no, because I haven't read Volcker
29 in all of its glory, no.

30
31 Q. And the inquiry has received information to the effect
32 that one way that suppliers could pay a 10 per cent
33 aftersales service fee was to pay it to an account in the
34 Al Rafidain Bank in Jordan; right?

35 A. I became aware of that during discussions with the
36 investigator for Volcker in the beginning of 2005 - he
37 explained that to me. He didn't - I don't recollect him
38 using the name of that bank, but he was talking about a
39 Jordanian bank.

40
41 Q. Do any of those matters that I have just put to you as
42 information received by the inquiry assist to refresh your
43 recollection of any discussions you had with Mr Shimoon
44 about that topic?

45 A. No.

46
47 THE COMMISSIONER: Q. The Volcker Report also indicated

1 that where a 10 per cent what was called aftersales service
2 fee was required to be paid, it was required to be paid in
3 advance of the goods being delivered?

4 A. Yes.

5

6 Q. But that, in some instances, an arrangement was made
7 whereby the sum could be paid after delivery, provided a
8 guarantee was given. This rather suggests that latter
9 situation?

10 A. On the face of it, yes, I would have to agree with
11 that, Commissioner, reading it today, but you will
12 recollect that in 2001 I had never heard of Volcker, I had
13 never heard of aftersales service fees, I had never heard
14 of bank guarantees in Jordan. The significance of this at
15 the time certainly didn't register on me that it does
16 today.

17

18 MR WIGNEY: Q. Can I seek your assistance, Mr Joyce, in
19 relation to just two other aspects of this note. Firstly,
20 you will see some figures under the total of Euros 965,000,
21 and you will see 17.5%, 90, and Euro 1800?

22 A. Yes.

23

24 Q. Are you able to assist us in relation to those
25 figures?

26 A. They would appear to be the key numbers in the
27 transaction, in that the gross price is 965,000 Euros;
28 Shimoon is entitled to 17.5 per cent of the original offer
29 price; the 90 Euros is the overprice; and the 1800 Euros is
30 the discrepancy between the - if you add those up and the
31 amount that we paid to Shimoon, there is a discrepancy of
32 1800 Euros, which we disclosed to you in my first statement
33 in December. Unfortunately, I cannot remember what that
34 1800 Euros is for. I can't, even seeing it there, which
35 I saw yesterday - I can't remember what it is.
36 Unfortunately I didn't write down what it is. My best
37 guess is it's yet another expense Shimoon claimed that we
38 should pay for, and, in my largesse, I obviously agreed to
39 pay it.

40

41 Q. Could it be, Mr Joyce, that that additional expense,
42 that was indeed duly paid, was the expense in setting up
43 the guarantee with the Al Rafidain Bank - that is, the
44 guarantee to pay the Iraqis 90 Euros per kilo in relation
45 to the contract?

46 A. It is possible, but you have to say that it is - even
47 for Jordanian banks, 1.8 per cent for a bank guarantee is

1 on the high side - but it could be - actually, it is almost
2 2 per cent, which is a fairly high bank fee for that type
3 of document.

4
5 Q. You simply have no recollection?

6 A. No, I have no recollection what it is at all.

7
8 Q. Do you have any recollection of a guarantee being
9 provided at any time in the course of this particular
10 transaction?

11 A. Not that I'm aware of.

12
13 THE COMMISSIONER: Q. Could you put up AOA.0001.0173,
14 please. Mr Joyce, this appears to be emails addressing the
15 situation that the truck delivering the goods was stopped
16 at the border?

17 A. Yes.

18
19 Q. You received an email from Mr Hallak?

20 A. Yes.

21
22 Q. Who was, what, an agent in Jordan, was he?

23 A. He was a freight forwarder.

24
25 Q. Saying to the people at Hellmann, "I think they have
26 to pay the 10 per cent"?

27 A. Yes.

28
29 Q. That was forwarded to you?

30 A. Yes.

31
32 Q. You forwarded it on to Mr Shimon?

33 A. Yes.

34
35 Q. Did you make any inquiries as to what that 10 per cent
36 was?

37 A. No, I didn't, sir. I recollect that email extremely
38 well. You will notice the dates are on a weekend. This
39 was when the shipment was going from Amman, across the
40 desert, on a truck to Samara. I was following the movement
41 of the cargo very closely, because there was a large amount
42 of value in the cargo. I came to the office and saw this
43 email from the freight forwarder. My focus at the time was
44 entirely on the first sentence, the bit that's in bold,
45 which was waiting permission from the Ministry of Health.
46 We had carefully, as Mr Wigney has gone through, detailed
47 all of the documents that were required in this

1 transaction, both by the contract and by the letter of
2 credit. We had produced certificates from the Iraqi consul
3 in Sydney, from the UN, from the Department of Foreign
4 Affairs and Trade, from inspection agencies. There was a
5 raft of documents.

6
7 I saw this and said, "We need another certificate from
8 the Ministry of Health", and I was extremely concerned.
9 I rang Shimon, I faxed that to him. I assumed when I read
10 that email that this was some certificate which is not
11 uncommon in this trade, where, to enter into the country,
12 you actually need the Ministry of Health to agree that your
13 registration documents for the supply of pharmaceutical
14 chemicals is in order. Now, I didn't really know what it
15 meant, but that's what I assumed it was.

16
17 It is fair to say I had a vigorous conversation with
18 Shimon saying, "What the hell is going on here?", because,
19 "How could you demand yet another document; we know nothing
20 about it?" And Shimon kept saying, "It is a glitch. It is
21 a glitch. I will fix it. I will fix it". He never
22 explained to me what it was. I confess, sir, I must have
23 read the bit about the 10 per cent. I mean, I have read
24 the email. But my focus on it was all about the Ministry
25 of Health.

26
27 When I sat down in December to prepare the evidence
28 for this Commission, I then saw that email again. Had you
29 asked me before I saw that email, I would have told you
30 about the Ministry for Health, and I - because I read this
31 in December, post-Volcker, I was not happy to see that
32 10 per cent there, sir, but I have absolutely no memory of
33 that between whenever this happened in 2002 and 2005.
34 I didn't focus on the 10 per cent at all. I focused on the
35 Ministry of Health and I focused on I've got \$1.5m worth of
36 stuff sitting in a desert in Iraq and they want another
37 piece of paper.

38
39 MR WIGNEY: Q. Just on that same topic, Mr Joyce, the
40 Commissioner has taken you to the document at page 0173.
41 If I can just take you to a slightly expanded version of
42 that exchange of emails, commencing at page 0168, you will
43 see at the bottom of the page, and we will take the emails
44 in sequence, that there is an email from you to this email
45 address, to arefgez@go.com.jo?

46 A. Yes.

47

1 Q. You understood him to be the local transport agent for
2 the Hellmann freight contract?

3 A. Correct.

4

5 Q. You are asking for an update on the status report on
6 the shipment to Samara?

7 A. Yes.

8

9 Q. Above that, his reply is the one that the Commissioner
10 has just taken you to?

11 A. Yes.

12

13 Q. In relation to the 10 per cent. Then there is a
14 further email from you to Mr Aref again on the following
15 day, July 21 2002, at the top of the page, saying that
16 Mr Shimoon will contact both you and the Ministry of Health
17 to try and solve this problem; right?

18 A. Yes.

19

20 Q. That is consistent with what you have just told the
21 Commissioner about you believing that it was permission
22 from the Ministry of Health that was required?

23 A. Yes.

24

25 Q. If we then just go to page 0167, there is the next
26 email in sequence. It is later the same day, on 21 July,
27 and it is Mr Aref emailing back to you:

28

29 Thanks a lot for your action. Please
30 reconfirm to Mr Albert to rush solve matter
31 to avoid delay at border and for cargo
32 safety also FYI driver waiting with truck
33 at border as per our INSTR.

34

35 Right?

36 A. Yes.

37

38 Q. As you told the Commissioner, you were in contact with
39 Mr Shimoon about what you described as a glitch, being your
40 trucks stopped at the border in Trabil; right?

41 A. Yes.

42

43 Q. The next email in sequence is on the following
44 day, July 22, 2.35am. It is from you to Mr Aref again:

45

46 I understand from Mr Shimoon that you are
47 taking the necessary documents from Amman

1 to Trabil for the MoH approval. This
2 should have been completed yesterday or
3 early today. Mr Shi moon understands that
4 the truck should proceed to Samara today.

5
6 And you say you are accepting responsibility for the
7 demurrage; right?

8 A. Yes.

9
10 Q. So you understood that the required document was being
11 obtained by Mr Shi moon; right?

12 A. Yes.

13
14 Q. If you then go to the email at the top of the page, it
15 is Mr Aref's reply to you of 22 July at 2.40pm. He says:

16
17 Yes we rcvd guarantee extension from bank
18 and same sent with taxi driver to border.
19 Hope this dct's accepted. Shall advise
20 developments today.

21
22 Right?

23 A. Yes.

24
25 Q. Now, that suggests, does it not, that the document
26 that was holding things up was a guarantee extension from
27 the bank; correct?

28 A. Yes, it does.

29
30 Q. And that, I would suggest, seems to marry in with the
31 note that I just previously had taken you to about a
32 requirement for a guarantee from the Al Rafidain Bank for
33 the payment of the 90,000 Euros; right?

34 A. Yes, it does.

35
36 Q. Did you ever see this guarantee that seemed to be
37 responsible for releasing the trucks?

38 A. No.

39
40 Q. Did you ever ask Mr Shi moon for a copy of it?

41 A. No. When I saw that email and the following one,
42 which advises that the goods have been delivered to Samara,
43 my reaction was one of relief. I didn't understand what
44 guarantee extension from the bank was. I was very pleased
45 that my \$1.5m of stuff, which was my risk on account, had
46 been delivered. That was my entire focus. Sure, when
47 I read that in December of 2005, I can tell you what it

1 meant. It didn't mean anything to me in 2002, although it
2 is clearly obvious that in July 2002 freight forwarding
3 companies in Iraq - in Jordan knew precisely what was going
4 on.

5
6 Q. Have you ever asked Mr Shimon whether he created the
7 guarantee that's referred to in this document --

8 A. No.

9

10 Q. -- and the earlier document?

11 A. No.

12

13 Q. You would agree, as you sit there today in the witness
14 box, that the likelihood is that this was referable to
15 guaranteeing a payment of 90,000 Euros to the Iraqi
16 Government; correct?

17 A. It is likely, but I - there is no - I don't have any
18 hard evidence of that. I mean, if you look at the general
19 framework of what's been disclosed to Volcker and to this
20 inquiry so far, I think you would have to come to that
21 conclusion, but there is no specific evidence of that.

22

23 Q. We will come in a moment to your discussions and
24 continuing discussions with Mr Shimon, but have you ever
25 asked him about this guarantee - ever?

26 A. No.

27

28 Q. What about when you read Volcker, as you say - meaning
29 the IIC final report?

30 A. Not particularly. I - I have not read Volcker in
31 full. I have largely read newspaper reports of Volcker,
32 and I have read similar appendices related to ourselves.
33 What I read in the newspaper tended to confirm what the
34 Volcker inspector had told me in January as to how the
35 system worked. So I have not read Volcker in full detail -
36 in any detail. In fact, I have not read Volcker at all.

37

38 Q. Now, as I think you indicated, following Mr Shimon
39 arranging for this document to be sent to the border, the
40 goods were allowed into Iraq; correct?

41 A. Yes.

42

43 Q. In due course you became aware that they had been
44 certified by the UN certifying agency Cotechna?

45 A. Yes.

46

47 Q. In due course you received the necessary documentation

1 back?
2 A. Yes.
3
4 Q. For you to be able to claim payment on the letter of
5 credit; right?
6 A. Yes.
7
8 Q. And that occurred, I think, as we demonstrated from
9 the Commonwealth Bank document that I took you to earlier,
10 some time in August of 2002?
11 A. Yes.
12
13 Q. I think I took you to the Commonwealth Bank document
14 about the disbursements of the proceeds of the letter of
15 credit, including the payment to Mr Shimoon. I should take
16 you, for completeness, to the document at AOA.0001.0208.
17 That's a fax to the Commonwealth Bank directing the payment
18 of 243,175 Euros to an account that had been nominated to
19 you by Mr Shimoon; right?
20 A. That's correct, and the account was in his name.
21
22 Q. I think we have already travelled down this path, but
23 you include in your statement, your first statement,
24 I think, a calculation about that in relation to that
25 figure of 243,175. You have agreed that it represents
26 17.5 per cent on the 865,000 portion of the contract?
27 A. Yes.
28
29 Q. 90,000 Euro overprice?
30 A. Yes.
31
32 Q. And there is a discrepancy of \$1800 that you can't
33 explain --
34 A. Yes.
35
36 Q. -- but reference seems to be made in that note that we
37 took you to earlier?
38 A. Yes.
39
40 Q. The balance of the proceeds of the letter of credit
41 went straight into an account controlled by the directors
42 of Alkaloids Australia?
43 A. That's correct.
44
45 Q. You in due course accounted to the directors, the
46 Crumptions, in a document that's at AOA.0001.0125, if that
47 can be brought up - is that so?

1 A. Yes.
2
3 Q. You will see there the reference to Mr Shimoon's
4 commission, about halfway down the page, estimated returns
5 in Australian dollars is commission in Australia - I will
6 come back to that, that's your commission?
7 A. Yes; that's correct.
8
9 Q. Commission overseas, once it had been put into
10 Australian dollar currency, it was some \$437,000 paid to
11 Mr Shimoon; correct?
12 A. Correct.
13
14 Q. Your commission of \$25,628.26 --
15 A. Yes.
16
17 Q. -- can you tell us, please, how that was calculated?
18 A. It was calculated as 2 per cent of the net amount of
19 the 1.7 minus the 0.4.
20
21 Q. That is the total sale price, less Mr Shimoon's
22 commission --
23 A. Yes.
24
25 Q. -- and then 2 per cent?
26 A. Yes.
27
28 Q. Is it usual for your commission to be calculated on
29 that basis - that is, first deducting the --
30 A. No, it is usually calculated on the gross amount.
31
32 Q. What was it that caused the change in the usual
33 procedure in this case?
34 A. I had agreed with the Crumptions at the beginning of
35 this transaction that we originally knew that the original
36 amount of commission was going to be very high - namely,
37 15 per cent - and that the transaction itself was going to
38 be quite large, that we would do this for that lesser
39 commission. My thinking, from my point of view, was that
40 this was a large single transaction and that we could
41 afford to do that for the Crumptions at a lower price.
42 Little did I know how much difficulty there would be in
43 earning that money.
44
45 Q. If I can just move on and try and deal with this as
46 briefly as possible, I want to ask you a bit about your
47 contacts with Mr Shimoon following this particular

1 contract --
2 A. Yes.
3
4 Q. -- that was entered into in 2001, consummated in 2002;
5 right?
6 A. Yes.
7
8 Q. Now, you deal with this, to a certain extent, in the
9 third of your statements - that's the one that was prepared
10 and tendered today; right?
11 A. Yes.
12
13 Q. Can I try and again put it in a brief terms as
14 possible: the contract that we have been discussing in
15 evidence today was a tender under phase IX of the
16 Oil-for-Food Program?
17 A. That's correct.
18
19 Q. You put in a tender in July of 2001 under phase X of
20 the program through Mr Shimoon again?
21 A. Yes.
22
23 Q. You put in a tender under phase XI in January of 2002,
24 again through Mr Shimoon?
25 A. Yes.
26
27 Q. I should have said, in relation to the phase X tender,
28 there was no contract entered into?
29 A. That's correct.
30
31 Q. Likewise in relation to the phase XI?
32 A. That's correct, no contract.
33
34 Q. In relation to the tender under phase XII, that was
35 made again through Mr Shimoon in January of 2003; right?
36 A. That's correct - in, sorry? In January 2002?
37
38 Q. 2003?
39 A. Sorry, yes.
40
41 Q. Now, if I can just take you briefly to a couple of
42 documents relevant to that tender, because, as it turns
43 out, your tender was accepted in that case; right?
44 A. Correct - or partly accepted, yes.
45
46 Q. Can I take you to, firstly, a note which is
47 AOA.0002.0533. Now, that is a note, again, from your day

1 book in your handwriting; is that correct?

2 A. Yes.

3

4 Q. It is from 22 October 2002, and, putting aside the
5 first entry relating to Libby, it seems to record a
6 discussion you had with Mr Shimson on 22 October 2002;
7 right?

8 A. Yes.

9

10 Q. It talks about Canada having good relations with Iraq,
11 and then the note records:

12

13 Good chance 500kg - through UNE 850
14 competition.

15

16 Right?

17 A. Yes.

18

19 Q. Can I suggest that what that is recording is
20 Mr Shimson saying, by reference to the tender for phase XII
21 that was being proposed at this stage, that if you put in a
22 tender for 500 kilograms of hyoscine at a price that met
23 the competition at Euro 850, there would be a good chance
24 of getting the deal; right?

25 A. Yes, that's probably what he was saying to me.

26 Whether that was correct or not is another story, but
27 that's what he was saying to me, yes.

28

29 Q. So he is telling you that the competition is at 850
30 and suggesting --

31 A. Euros.

32

33 Q. -- you should put in a bid around that time at around
34 that price and you may get the contract; right?

35 A. Yes.

36

37 Q. If we then go to the tender document --

38 A. Sir, I think I wish to explain the rest of those
39 figures on that, in that the arrangements that we had come
40 to with Shimson by this stage, given the argy-bargy and the
41 currency fluctuations that had occurred in the phase IX
42 contract, we had said to Shimson - and this is in documents
43 presented to you - "We will quote you a net US dollar price
44 and then whatever the Euro price you achieve is yours. The
45 difference between that Euro price and our net bottom line
46 US dollar price, we will convert the Euros the day we get
47 the money, however many US dollars that is, we are going to

1 deduct our price and the rest is yours." Now, in that
2 basis of that conversation for that tender we said our
3 price was 705, and there was argy-bargy and we agreed to
4 695. So we quoted him a US dollar price of 695, and he
5 could quote the Iraqis anything he liked. And there was no
6 15 per cent, 17 per cent - there was nothing. It was
7 100 per cent overprice-type deal.

8
9 Q. Okay. If we go to the tender document which is at
10 AOA.0001.0860, that, as it records, is a tender under
11 I think phase XII, is that right, or is it phase XIII?

12 A. It got very confusing as to what phase we are up to.
13 I'm not sure if that's XII or XIII.

14
15 THE COMMISSIONER: It is phase XIII, M1, 2, 3/13/03.

16
17 MR WIGNEY: Q. In any event, it is 13 January, so a
18 month or two after the discussion you had with Mr Shimoon
19 about it?

20 A. Yes.

21
22 Q. It is a document that has been signed by you and it is
23 a tender under that particular phase of the program?

24 A. Yes.

25
26 Q. Consistently with the conversation you had with
27 Mr Shimoon back in October, the Euro price that has been
28 quoted in the offer is 848 Euros per kilo - that is, two
29 Euros per kilo under what Mr Shimoon had described as the
30 competition; right?

31 A. Yes.

32
33 Q. And the competition, may we take it, is that there
34 were other people in the market that were offering to
35 supply goods at around 850 Euros?

36 A. You would assume that, yes.

37
38 Q. If we then go, Mr Joyce, to this document,
39 AOA.0001.0032, you - that is, Alkaloids - in due course won
40 this contract; correct?

41 A. I believe so, yes.

42
43 Q. It is a terrible copy, I know, but if we go to the
44 third page of the document, which is at 0034, you will see
45 that the contract price for the 500 kilograms of hyoschine
46 is 935 Euros per kilo; right?

47 A. Yes.

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Q. Again, I confess I am not doing this in my head right now, but the fact is, Mr Joyce, that that is almost exactly 10 per cent higher than the tender price in the tender that I just took you to; right?

A. Yes, it is.

Q. This follows an almost remarkably similar pattern than was established in relation to the phase IX tender and contract; does it not?

A. Yes, it is when you sit here and look at it all today, but try looking at them 18 months apart and see whether you recognise the significance of them then, because that's what the difference - the difference between those two events is 18 months; it is in fact nearly two years.

Q. The pattern to which I refer is that the contract is tendered for and the contract is awarded at a price almost exactly 10 per cent higher than the tender price; right?

A. Yes, it is.

Q. At the time that this contract was awarded at the higher price, were you as surprised as you were in relation to the phase IX contract?

A. To be honest with you, Mr Wigney, by the time this happened I think the war had either started or was about to start, and I think I had got to the view that we weren't shipping anything to Iraq, and I wasn't that interested. I don't really recollect that price the way I recollect the first price. I clearly recollect the first price, as I have outlined to you. I really have no memory of that 935 at all, because by the time it all happened, it was happening, and it was quite clear that we were never going to ship it, so I just don't - it never entered my memory stream.

Q. May we take it from that answer that you don't recollect ever asking Mr Shimon how he had achieved the remarkable feat of, yet again, getting 10 per cent more than the contract price that had been put in your tender?

A. I certainly do not recollect doing that at all.

Q. And you have never asked him to that day?

A. I don't recollect having asked him that to this day, and I don't think I have.

Q. Just bear with me for one moment.

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THE WITNESS: Commissioner, could I have a short break, please?

THE COMMISSIONER: Certainly.

(The witness withdrew from the hearing room).

THE COMMISSIONER: Just during that break, I will remind any members of the media who may be here that I have previously made an order that the names of any United Nations investigators are not to be published.

(The witness returned to the hearing room).

THE WITNESS: Thank you, Commissioner.

MR WIGNEY: Q. There are just one or two questions more in relation to this particular offer and then I want to move on, finally, to one different topic. Can we go, please, to AOA.0002.0554. That's a terrible copy of a note, but fortunately the one passage I wanted to take you to is actually legible. It is in the middle of the page. It says:

Albert.
Has the 500 kg contract signed by committee
Signed by general director
Went to ministry - should be done in few
days
Sold at 850 Euros

A. Yes.

Q. That would seem to be a reference to the contract to which I have just taken you; correct?

A. Probably, but I - I don't see the date on it, so I - but I would assume that's right. I assume you are dealing in that beginning of 2003; is that right?

THE COMMISSIONER: Is that 850 or 950?

MR WIGNEY: My reading of the document, Commissioner, is 850, which is consistent with the tender price, or thereabouts.

THE COMMISSIONER: You may be right. Yes.

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MR WIGNEY: Q. That's suggesting that you had been advised as at the date of this note that the contract had been accepted at 850 Euros; right?

A. It appears that way, yes.

Q. Now, that is rather inconsistent with the contract to which I have taken you, which is at the price of 935 Euros per kilo --

A. Yes.

Q. -- which is, as it happens, 850 Euros per kilo plus 10 per cent; right?

A. Yes.

Q. Do you recall being told by Mr Shimoon that the contract had been awarded at 850 Euros per kilo but there had been added to it a 10 per cent figure?

A. No, I don't recall that at all.

Q. One other thing I want to ask you about in relation to this note is that under the reference to it being sold at 850 Euros is what appears to read:

Claims the young ones checking.

Do you recall that being said to you by Mr Shimoon?

A. I am sorry, I don't recall what that refers to at all.

Q. Just finally in relation to that phase XII or XIII contract, you sought and obtained UN approval of that contract in about April of 2003; does that accord with your recollection?

A. Yes.

Q. But there was a problem in completing or consummating that contract, largely because of the United States action in Iraq that occurred towards the middle of that year?

A. Yes.

Q. There is a document in your files that suggests that in December 2003 you wrote to the relevant Iraqi authority suggesting that you were still in a position to perform that contract - I can take you to it if needs be.

A. Yes, I remember at the end of 2003 - the invasion occurred in March 2003?

1 THE COMMISSIONER: Q. Yes.
2 A. Yes. Some time during 2003 - if it was December, I
3 will agree or accept that - we were asked whether we could
4 fulfil the contract. We said yes, not really believing it
5 was ever going to happen.
6
7 MR WIGNEY: Q. It never happened, I take it?
8 A. No, it never happened.
9
10 Q. Since that --
11 A. From the beginning of 2003 I didn't believe any of
12 this was going to happen, but we kept putting in documents.
13
14 Q. From that time - that is, the end of 2003 - really up
15 until the present you have had some continuing contact with
16 Mr Shimoon; is that right?
17 A. Yes.
18
19 Q. Did you have any contact with him between mid 2003,
20 when these contract discussions were taking place, and the
21 end of 2004?
22 A. I don't think so, no - well, I probably must have, but
23 I don't think there are any notes that I have got, and I
24 can't particularly remember. I remember during that period
25 he was sending me various emails about protests against the
26 war and how to - what to do when you have a heart attack,
27 and there may have been the odd phone call, but there was
28 nothing of any great substance that was going on at the
29 time.
30
31 Q. I take it there was no commercial dealings?
32 A. No commercial dealings at all in 2004.
33
34 Q. In either late 2004 or early 2005, were you contacted
35 by some investigators from the Independent Inquiry
36 Committee of the UN?
37 A. Yes, I was.
38
39 Q. They asked you some questions?
40 A. Yes, they did.
41
42 Q. And they, in particular, asked you about any payments
43 that you may have made in relation to the phase IX
44 contract?
45 A. Yes, they did.
46
47 Q. That included payments that you made to any agent?

1 A. That's correct.

2

3 Q. You had some email correspondence with these
4 investigators, did you not?

5 A. Yes, I did.

6

7 Q. I just want to take you fairly briefly to that
8 correspondence and ask you some other questions about it.

9

10 MR WIGNEY: Commissioner, I only have unedited versions,
11 unfortunately, of these emails, but it is perhaps
12 sufficient, having regard to the orders that you have made
13 and the reminders to the press, that we can deal with it on
14 the screens in an unedited way, on the understanding that
15 it not be published.

16

17 THE COMMISSIONER: Yes.

18

19 MR WIGNEY: Q. Could the document AOA.0001.0005 be put
20 on the screen, please. I think that document that's on the
21 screen is the second of the emails. If I can take you to
22 the second page of that document at page 0006, at about
23 halfway down the page do you identify that as the first
24 email you sent to the IIC investigators?

25 A. The one dated 2 February?

26

27 Q. That's correct.

28 A. Yes.

29

30 Q. You provide some details about the dates and shipment
31 relevant to the phase IX contract that we have discussed?

32 A. Yes.

33

34 Q. Then, on the very bottom of the page you say:

35

36 The trader who arranged the deal and who
37 assisted through almost two years of
38 negotiations and difficulties created by
39 the USA after the contract was awarded was
40 AS International, Canada. We paid the
41 commission in Euros to AS International.

42

43 A. That's correct.

44

45 Q. That, of course, is a reference to Mr Shimon; is that
46 right?

47 A. That's correct.

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Q. Now, as I understand the evidence in your third statement, that's the statement that you have signed today, at about the time that you sent this email, or shortly before it, you had some contact with Mr Shimon; is that right?

A. That's correct.

Q. You had a discussion with Mr Shimon about what could or couldn't be said to the UN investigators; is that right?

A. Not particularly. It was the fact that the Volcker committee had approached me and they had asked me certain questions and I thought he would want to know about that.

Q. He told you, "Don't tell the IIC about commission payments", in short, didn't he?

A. He actually said, "Don't tell them my name; don't tell them what I am involved in", which I had already done, and which I subsequently did tell them - his name.

Q. But you ultimately acceded to Mr Shimon's request of not telling the IIC investigators about the amount of the payment that had been made to Mr Shimon, didn't you?

A. I didn't provide the Volcker Inquiry with - they asked a number of detailed questions, one of which related to Mr Shimon. I never provided any of that information on the basis that that was a relationship - those commercial relationships were between our company and other companies, including Mr Shimon's, but also including, for example, Hellmanns. I had no release to provide information to that inquiry of the commercial detailed negotiations we had with third parties, and I didn't feel able to release that information to the Volcker investigators. It wasn't just Mr Shimon's ones I didn't answer, I didn't answer the questions he asked about Hellmanns and everybody else.

Q. Can I take you to the IIC investigator's reply, which is at 0005. It is 3 February 2005. I think you will agree you didn't reply to this email at all?

A. That's correct. I didn't reply at all.

Q. Firstly, they ask you the details for AS International?

A. Yes.

Q. Secondly, the investigator states:

1 Did you receive a fax/e-mail, letter or any
2 other notification from A-S International,
3 Hellmann or any other party involved in the
4 transaction requesting (i) that you pay a
5 "service" aftersales service fee; or (ii)
6 stating that the goods would not be allowed
7 into Iraq unless you could produce a
8 receipt to show that you had paid the
9 service fee (for example a 10% (or less or
10 more) service fee?

11
12 Right?

13 A. Yes.

14
15 Q. When you read that paragraph of this email, did it
16 bring to mind the exchange of emails that the Commissioner
17 initially directed your attention to in your evidence today
18 referring to the 10 per cent payment required at the
19 border?

20 A. No, it didn't. It certainly did not relate to the -
21 it didn't bring to my mind any of the 10 per cents that
22 have been - not only the border, there is also the two
23 contracts that have been increased by 10 per cent. It
24 didn't bring any of those to mind, because you are dealing
25 with a gap of more than three years at that particular
26 time. In addition to that email, in the long discussion
27 I had with the investigator on 27 January, he explained to
28 me how the Iraqi system worked, so what he is telling me in
29 this email is really the same as what we had discussed in
30 the telephone conversation. He had asked me about this
31 aftersales service fee. That's the first time I had ever
32 heard the term, and I had denied that to him in the
33 telephone conversation. And, quite frankly, the
34 10 per cent - I was quite confident we hadn't done that.
35 The thing in this email that made me think, "Uh-oh,
36 something's going wrong here" was this Jordanian bank
37 account, because I knew that we had paid Shi moon's money
38 into a Jordanian bank account.

39
40 Q. Well, having been told by the investigator about the
41 10 per cent aftersales service fee, and perhaps your
42 concern being raised by reference to the Jordanian bank
43 account, did you ring Mr Shi moon and ask him if he had ever
44 paid a fee amounting to 10 per cent?

45 A. No.

46
47 Q. Did it cause you to go back and look at the documents

1 and look at the fact that the --
2 A. No, I didn't go back and look at the documents again
3 until December 2005. I felt that the Volcker Inquiry was
4 after much bigger fish than us. As I now know, having -
5 how long it took to go back through the documents for this
6 inquiry, sir, it is a lot of work, and I didn't feel
7 constrained to go and do that on behalf of some inquiry out
8 of the US.

9
10 Q. May we take it that you, to this day, have never asked
11 Mr Shimoon whether he ever paid a 10 per cent fee?

12 A. No, I have not asked him.

13
14 Q. Or whether that is an explanation for the fact that
15 the contract price was 10 per cent more than the tender?
16 A. Since this inquiry started, sir, as I disclosed in the
17 statement today, I have spoken to Mr Shimoon once, and that
18 was yesterday afternoon. And I can assure you yesterday
19 afternoon I was not going to ask him about anything to do
20 with this transaction or the evidence I was about to give
21 to this inquiry.

22
23 Q. I will come to that briefly in a moment, but just
24 dealing with your continuing contact with Mr Shimoon, you
25 had some further contact with him in April of last year,
26 did you not?

27 A. Yes.

28
29 Q. You discussed, via email, a further proposal to sell
30 goods into Iraq - that is, hyoscine; right?

31 A. Yes.

32
33 Q. And there was a suggestion again that Mr Shimoon would
34 act on your behalf as agent to ship hyoscine, to sell
35 hyoscine to Iraq; right?

36 A. Yes.

37
38 Q. May we take it that you never asked him at that time -
39 that's April 2005 - about any 10 per cent fee, or anything
40 to that effect?

41 A. I certainly did not. What I gave - what I said to him
42 in April was, "Albert, here is our bottom line price idea.
43 If you have some firm proposals, come back and talk to me."
44 I frankly felt that he was on a fishing trip, he had no
45 serious business at all, and that's been demonstrated by
46 the fact I have never heard from him since on that matter.

47

1 Q. You did have some further email exchange and
2 correspondence with Mr Shimoon in October of last year;
3 right?

4 A. Yes.

5

6 Q. You sent Mr Shimoon by email an electronic version of
7 an article that had appeared in The Australian newspaper
8 relating to the findings of the Volcker Report, didn't you?

9 A. Yes.

10

11 Q. And you, in due course, also sent him a further email
12 advising him, I think as you have already said in your
13 evidence, about the announcement of this inquiry?

14 A. Yes; that's correct.

15

16 Q. Did you ask him anything at this stage about whether
17 he had ever paid a 10 per cent fee --

18 A. No, I did not - I don't recollect having - I certainly
19 didn't speak to him at any of those periods of time and
20 I don't recollect - certainly the emails I sent to him,
21 I certainly didn't ask him that. I basically sent him this
22 as information. I don't think I made any comment. I don't
23 particularly think he made any comment in return.

24

25 Q. Well, he certainly expressed some interest to know
26 what were the companies that were to be the subject of this
27 inquiry.

28 A. Yes, he did. Yes, he asked that and we told him. So
29 that was a very short question he asked, yes. That's
30 correct.

31

32 Q. And very finally, I think you have just referred to
33 the fact that you had some contact with Mr Shimoon as
34 recently as yesterday?

35 A. That's correct.

36

37 Q. That, it seems, was prompted by Mr Shimoon having
38 received some correspondence from this inquiry requesting
39 his cooperation?

40 A. I understand that - that was the reason he said he
41 rang, yes.

42

43 THE COMMISSIONER: Q. Which we are not going to receive?

44 A. Pardon?

45

46 Q. Which it doesn't seem we are going to receive.

47

1 MR WIGNEY: Q. Is that right?
2 A. I have tendered to you all of the exchanges of
3 information I have had with Mr Shimoon.
4

5 THE COMMISSIONER: It was just my comment. I am not
6 asking you to comment on it. It seems highly improbable
7 that Mr Shimoon is going to cooperate with us.
8

9 MR WIGNEY: Yes. Thank you.

10
11 THE COMMISSIONER: Mr Barker, do have any questions?
12

13 MR BARKER: No, I have no questions. Thank you.
14

15 THE COMMISSIONER: Yes. Thank you. That concludes your
16 evidence.
17

18 <THE WITNESS WITHDREW
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20 THE COMMISSIONER: Anything further?
21

22 MR WIGNEY: Nothing further today.
23

24 THE COMMISSIONER: Very well. I will adjourn until 10am
25 on Monday.
26

27 AT 3.33PM THE HEARING WAS ADJOURNED
28 TO MONDAY, 30 JANUARY 2005 AT 10AM
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1422:17, 1422:32 865,000 [1] - 1436:26 881 [1] - 1379:36 885 [5] - 1376:16, 1376:29, 1377:21, 1378:13, 1379:36	1378:38, 1379:35, 1387:24, 1391:20, 1391:26, 1392:2, 1392:45, 1417:30, 1444:3 Accept [1] - 1377:24 accepted [8] - 1378:23, 1393:7, 1401:11, 1412:8, 1434:19, 1438:43, 1438:44, 1443:4 accepting [1] - 1434:6 access [5] - 1361:22, 1384:34, 1394:18, 1416:13, 1419:14 accommodation [2] - 1364:32, 1380:33 accompanied [4] - 1364:38, 1367:19, 1367:20, 1367:22 accord [4] - 1374:34, 1378:29, 1378:42, 1443:32 accordance [4] - 1372:14, 1379:7, 1379:19, 1391:2 accorded [1] - 1384:30 Accounting [1] - 1372:36 account [17] - 1354:27, 1372:14, 1372:25, 1372:26, 1372:30, 1393:19, 1399:25, 1427:11, 1428:5, 1429:33, 1434:45, 1436:18, 1436:20, 1436:41, 1447:37, 1447:38, 1447:43 accounted [1] - 1436:45 accounts [1] - 1429:23 accurate [1] - 1368:28 achievable [3] - 1379:11, 1392:34, 1392:39 achieve [1] - 1439:44 achieved [1] - 1441:38 acknowledgment [1] - 1423:35 Act [1] - 1349:23 act [2] - 1373:21, 1448:34 action [3] - 1426:1, 1433:29, 1443:37 actions [1] - 1425:20 activities [5] - 1358:6, 1367:47, 1379:10, 1400:45, 1414:35 actual [2] - 1373:44, 1411:41 acute [1] - 1391:41 add [4] - 1377:14, 1377:23, 1377:43, 1430:30 added [2] - 1346:17, 1443:18 addition [5] - 1351:38, 1379:25, 1399:23, 1412:14, 1447:26	additional [2] - 1421:3, 1430:41 additions [1] - 1365:24 address [11] - 1347:32, 1366:5, 1382:34, 1383:5, 1383:14, 1383:15, 1393:29, 1394:39, 1406:28, 1407:4, 1432:45 addressed [7] - 1382:3, 1382:25, 1383:20, 1383:21, 1383:22, 1384:22, 1427:39 addresses [1] - 1382:38 addressing [2] - 1400:12, 1431:14 adequate [1] - 1382:42 adjourn [2] - 1410:36, 1450:24 Adjourned [1] - 1450:27 Adjournment [1] - 1410:38 adjournment [1] - 1411:5 administrative [2] - 1354:43, 1375:42 admiration [1] - 1390:13 advance [5] - 1400:33, 1401:43, 1401:46, 1430:3 advise [3] - 1367:43, 1389:14, 1434:19 advised [10] - 1368:31, 1383:41, 1411:24, 1411:40, 1415:37, 1415:39, 1417:11, 1418:13, 1420:17, 1443:3 advises [1] - 1434:42 advising [1] - 1449:12 Affairs [9] - 1362:21, 1363:33, 1363:40, 1424:23, 1424:40, 1424:45, 1425:12, 1425:34, 1432:4 affirmed [1] - 1347:24 afford [2] - 1403:37, 1437:41 afraid [2] - 1368:15, 1378:44 afternoon [3] - 1409:22, 1448:18, 1448:19 aftersales [10] - 1345:32, 1345:33, 1345:41, 1346:11, 1429:33, 1430:1, 1430:13, 1447:5, 1447:31, 1447:41 afterwards [1] - 1399:18 agencies [2] - 1357:22, 1432:4 agency [8] - 1353:27, 1357:33, 1358:26, 1369:25, 1369:30, 1372:39, 1386:26, 1435:44 agent [25] - 1346:28,	1353:23, 1356:40, 1357:32, 1365:44, 1368:44, 1368:47, 1369:15, 1369:20, 1369:24, 1369:33, 1373:5, 1373:8, 1373:17, 1385:43, 1386:35, 1386:47, 1389:13, 1400:31, 1405:2, 1413:35, 1431:22, 1433:1, 1444:47, 1448:34 agents [25] - 1346:37, 1353:40, 1356:6, 1356:42, 1356:43, 1357:1, 1357:9, 1357:21, 1357:37, 1357:47, 1358:7, 1358:15, 1358:26, 1358:32, 1366:28, 1373:27, 1373:33, 1378:18, 1389:12, 1398:26, 1404:34, 1413:32, 1413:42, 1416:8, 1416:39 ago [2] - 1376:47, 1382:37 agree [35] - 1355:1, 1355:45, 1358:12, 1358:15, 1358:25, 1358:32, 1361:15, 1366:21, 1366:26, 1368:34, 1368:41, 1369:24, 1377:26, 1379:41, 1385:24, 1389:3, 1389:5, 1389:8, 1392:18, 1393:26, 1397:8, 1404:6, 1404:39, 1407:45, 1408:46, 1413:45, 1414:27, 1417:8, 1427:8, 1430:10, 1432:12, 1435:13, 1444:3, 1446:38 agreed [37] - 1354:13, 1366:16, 1368:35, 1369:29, 1377:15, 1386:20, 1390:9, 1390:26, 1391:44, 1392:5, 1393:18, 1393:47, 1402:1, 1404:4, 1404:24, 1404:31, 1405:30, 1407:22, 1409:4, 1409:11, 1409:16, 1411:13, 1411:47, 1414:30, 1415:36, 1418:46, 1419:8, 1422:30, 1422:42, 1424:22, 1424:33, 1428:16, 1429:1, 1430:38, 1436:25, 1437:34, 1440:3 agreeing [4] - 1392:24, 1408:26, 1412:45, 1423:17 agreement [36] -	1353:27, 1353:30, 1353:33, 1357:33, 1390:38, 1394:45, 1406:19, 1407:21, 1407:26, 1407:33, 1409:39, 1409:40, 1409:46, 1412:10, 1412:29, 1412:47, 1413:14, 1413:29, 1413:46, 1414:2, 1414:17, 1414:47, 1415:4, 1415:13, 1415:17, 1415:24, 1417:5, 1420:30, 1420:41, 1420:45, 1421:23, 1421:42, 1422:11, 1422:38, 1423:2, 1423:23 agreements [4] - 1357:20, 1357:36, 1358:19, 1358:26 ahead [1] - 1400:11 air [3] - 1371:14, 1371:19, 1382:20 airport [3] - 1371:6, 1371:7, 1371:13 AI [5] - 1429:15, 1429:22, 1429:34, 1430:43, 1434:32 alarm [2] - 1398:16, 1398:18 Albert [21] - 1346:30, 1358:46, 1366:2, 1367:43, 1368:17, 1375:7, 1375:22, 1381:30, 1383:41, 1395:45, 1401:1, 1407:39, 1412:18, 1412:33, 1414:5, 1418:27, 1422:42, 1428:25, 1433:30, 1442:26, 1448:42 Alkaloids [80] - 1345:13, 1345:22, 1345:25, 1345:35, 1346:1, 1346:29, 1346:33, 1346:36, 1346:45, 1347:13, 1349:30, 1350:23, 1350:25, 1350:26, 1351:6, 1351:34, 1351:39, 1351:45, 1352:15, 1352:22, 1352:47, 1353:6, 1353:23, 1353:29, 1353:35, 1353:45, 1354:13, 1354:27, 1356:10, 1357:12, 1357:13, 1357:20, 1358:39, 1364:22, 1365:15, 1366:27, 1367:14, 1367:45, 1368:2, 1368:22, 1368:23, 1368:29, 1368:42, 1369:1, 1369:7, 1369:8, 1369:18, 1369:22, 1369:30, 1369:38,
9				
90 [22] - 1390:11, 1392:1, 1392:37, 1393:4, 1415:40, 1418:42, 1419:1, 1419:7, 1419:9, 1420:25, 1422:43, 1428:25, 1428:26, 1428:33, 1428:36, 1428:37, 1429:5, 1429:11, 1430:21, 1430:29, 1430:44 90,000 [5] - 1346:17, 1346:26, 1434:33, 1435:15, 1436:29 90s [1] - 1352:41 92 [1] - 1350:6 935 [3] - 1440:46, 1441:31, 1443:8 950 [1] - 1442:41 955 [8] - 1388:34, 1388:46, 1390:11, 1419:9, 1420:18, 1420:39, 1421:46, 1422:3 955,000 [5] - 1346:5, 1346:8, 1418:4, 1420:19, 1427:41 965 [2] - 1420:39, 1421:46 965,000 [2] - 1430:20, 1430:27 99 [1] - 1359:16				
A				
A01/083 [1] - 1419:27 Aa [2] - 1395:44, 1401:1 abbreviation [1] - 1372:5 Abdel [1] - 1416:37 ability [1] - 1387:20 able [18] - 1348:11, 1361:18, 1361:24, 1362:2, 1362:7, 1365:9, 1365:19, 1376:17, 1384:17, 1392:28, 1401:16, 1413:35, 1419:12, 1423:22, 1428:27, 1430:24, 1436:4, 1446:32 absence [2] - 1415:3, 1415:11 absolutely [6] - 1359:15, 1372:6, 1388:26, 1411:21, 1411:25, 1432:32 acceded [1] - 1446:21 accept [14] - 1371:47, 1377:17, 1377:19, 1377:39, 1377:47,				

<p>1371:28, 1373:4, 1373:18, 1379:22, 1387:16, 1388:10, 1388:30, 1393:47, 1395:24, 1399:46, 1401:29, 1403:35, 1403:41, 1404:44, 1405:2, 1405:3, 1405:7, 1405:34, 1405:43, 1415:18, 1418:2, 1418:26, 1420:31, 1420:43, 1421:47, 1425:42, 1427:39, 1436:42, 1440:39</p> <p>Alkaloids [5] - 1356:16, 1356:40, 1371:4, 1413:32, 1425:19</p> <p>allow [1] - 1386:26</p> <p>allowed [3] - 1372:39, 1435:40, 1447:6</p> <p>almost [11] - 1355:36, 1356:37, 1398:23, 1408:32, 1414:7, 1419:45, 1431:1, 1441:3, 1441:8, 1441:18, 1445:37</p> <p>Almost [2] - 1356:43, 1424:8</p> <p>alter [1] - 1427:2</p> <p>Amman [3] - 1371:20, 1431:39, 1433:47</p> <p>amount [15] - 1355:28, 1401:38, 1407:28, 1409:13, 1409:43, 1412:46, 1413:16, 1415:39, 1429:5, 1430:31, 1431:41, 1437:18, 1437:30, 1437:36, 1446:22</p> <p>amounting [1] - 1447:44</p> <p>amounts [1] - 1387:8</p> <p>Anna [4] - 1383:9, 1383:26, 1383:29, 1383:31</p> <p>annexed [3] - 1345:23, 1345:24, 1345:30</p> <p>annexes [2] - 1348:19, 1349:16</p> <p>annexures [4] - 1348:19, 1348:33, 1349:3, 1350:21</p> <p>announcement [1] - 1449:13</p> <p>answer [9] - 1369:11, 1378:45, 1382:41, 1382:43, 1383:37, 1414:18, 1441:37, 1446:34</p> <p>answering [1] - 1413:39</p> <p>anticipate [2] - 1346:6, 1346:15</p> <p>anticipated [1] - 1346:24</p> <p>anticipation [1] - 1423:36</p> <p>antidote [1] - 1425:30</p> <p>ao [1] - 1344:25</p>	<p>Ao1/089 [1] - 1419:45</p> <p>Aoa0001.0005 [2] - 1350:5, 1445:19</p> <p>Aoa0001.0005-0007 [1] - 1350:9</p> <p>Aoa0001.0007 [1] - 1349:37</p> <p>Aoa0001.0032 [1] - 1440:39</p> <p>Aoa0001.0125 [1] - 1436:46</p> <p>Aoa0001.0159 [1] - 1427:35</p> <p>Aoa0001.0173 [1] - 1431:13</p> <p>Aoa0001.0208 [1] - 1436:16</p> <p>Aoa0001.0222 [1] - 1423:30</p> <p>Aoa0001.0347 [1] - 1418:1</p> <p>Aoa0001.0375 [1] - 1421:21</p> <p>Aoa0001.0444 [1] - 1424:37</p> <p>Aoa0001.0614 [1] - 1406:27</p> <p>Aoa0001.0627 [1] - 1405:28</p> <p>Aoa0001.0629 [1] - 1404:42</p> <p>Aoa0001.0630 [1] - 1404:15</p> <p>Aoa0001.0632 [1] - 1402:34</p> <p>Aoa0001.0654 [1] - 1381:35</p> <p>Aoa0001.0666 [2] - 1375:41, 1383:41</p> <p>Aoa0001.0667 [1] - 1393:36</p> <p>Aoa0001.0697 [1] - 1370:1</p> <p>Aoa0001.0708 [1] - 1364:47</p> <p>Aoa0001.0714 [2] - 1349:37, 1360:14</p> <p>Aoa0001.0714-aoa.001. 0007 [1] - 1350:3</p> <p>Aoa0001.0732 [1] - 1362:1</p> <p>Aoa0001.0770 [1] - 1366:47</p> <p>Aoa0001.0860 [1] - 1440:10</p> <p>Aoa0002.0085 [2] - 1359:28, 1360:39</p> <p>Aoa0002.0138 [1] - 1374:23</p> <p>Aoa0002.0139 [2] - 1376:14, 1382:47</p> <p>Aoa0002.0144 [1] - 1394:15</p> <p>Aoa0002.0313 [2] - 1426:22, 1428:22</p> <p>Aoa0002.0533 [1] -</p>	<p>1438:47</p> <p>Aoa0002.0554 [1] - 1442:21</p> <p>Aoa0002.0994 [1] - 1416:12</p> <p>Aoa0002.1032 [1] - 1418:17</p> <p>Aoa0007.0003 [2] - 1348:8, 1348:25</p> <p>Aoa0007.0010 [1] - 1384:28</p> <p>Aoa0007.0012 [1] - 1409:8</p> <p>Aoa0007.0049 [1] - 1367:19</p> <p>apart [1] - 1441:12</p> <p>apologise [1] - 1345:7</p> <p>apologised [1] - 1345:8</p> <p>Apotex [2] - 1365:38, 1365:43</p> <p>apparent [2] - 1360:8, 1399:44</p> <p>Appc [23] - 1353:19, 1353:29, 1353:33, 1354:18, 1354:26, 1354:42, 1357:11, 1357:20, 1359:10, 1359:42, 1366:16, 1366:27, 1375:43, 1393:47, 1399:44, 1401:30, 1403:35, 1403:45, 1404:22, 1405:2, 1405:39, 1415:18, 1421:47</p> <p>Appc's [3] - 1353:22, 1354:12, 1354:39</p> <p>appear [8] - 1345:2, 1375:11, 1376:2, 1383:42, 1383:43, 1404:15, 1404:42, 1430:26</p> <p>appeared [1] - 1449:7</p> <p>appendices [1] - 1435:32</p> <p>Appliances [4] - 1346:3, 1381:42, 1382:26, 1418:3</p> <p>application [3] - 1365:29, 1396:33, 1425:19</p> <p>appointing [1] - 1365:44</p> <p>appreciate [5] - 1359:28, 1360:28, 1376:46, 1403:25, 1419:4</p> <p>approach [1] - 1358:32</p> <p>approached [2] - 1353:10, 1446:12</p> <p>approaching [1] - 1346:16</p> <p>appropriate [1] - 1363:11</p> <p>approval [7] - 1362:31, 1424:14, 1424:18, 1425:19, 1425:42, 1434:1, 1443:31</p> <p>approve [2] - 1363:27, 1396:38</p> <p>approved [1] - 1390:46</p> <p>approximate [1] - 1423:6</p>	<p>approximates [1] - 1346:20</p> <p>approximating [2] - 1346:26, 1400:19</p> <p>April [4] - 1443:32, 1448:25, 1448:39, 1448:42</p> <p>area [1] - 1398:20</p> <p>Aref [3] - 1433:14, 1433:27, 1433:44</p> <p>Arefs [1] - 1434:15</p> <p>arefgez@go.com.jo [1] - 1432:45</p> <p>argument [1] - 1390:7</p> <p>argy [7] - 1406:5, 1407:9, 1407:44, 1411:23, 1411:32, 1439:40, 1440:3</p> <p>argy-bargy [7] - 1406:5, 1407:9, 1407:44, 1411:23, 1411:32, 1439:40, 1440:3</p> <p>arithmetic [1] - 1404:1</p> <p>arranged [1] - 1445:36</p> <p>arrangement [4] - 1366:22, 1368:42, 1393:43, 1430:6</p> <p>arrangements [7] - 1358:20, 1363:11, 1407:1, 1409:20, 1415:29, 1422:17, 1439:39</p> <p>arranging [1] - 1435:39</p> <p>arrive [2] - 1378:4, 1394:25</p> <p>arrived [2] - 1394:25, 1400:28</p> <p>article [1] - 1449:7</p> <p>ascertain [2] - 1370:12, 1392:7</p> <p>ascertained [2] - 1391:36, 1412:35</p> <p>Asia [2] - 1356:1, 1356:7</p> <p>aside [5] - 1356:10, 1356:30, 1357:18, 1414:13, 1439:4</p> <p>aspects [6] - 1353:34, 1353:40, 1357:27, 1363:45, 1416:44, 1430:19</p> <p>assessed [2] - 1393:2, 1393:4</p> <p>assessment [1] - 1399:1</p> <p>Assf [3] - 1345:32, 1345:33, 1345:40</p> <p>assign [1] - 1427:8</p> <p>assigned [1] - 1427:10</p> <p>Assignment [1] - 1426:40</p> <p>assignment [7] - 1426:46, 1427:6, 1427:30, 1428:10, 1428:15, 1428:18, 1428:24</p> <p>assist [9] - 1354:35, 1359:10, 1361:24, 1361:32, 1376:45,</p>	<p>1403:25, 1428:27, 1429:42, 1430:24</p> <p>assistance [1] - 1430:18</p> <p>assistant [1] - 1383:30</p> <p>assistants [3] - 1354:43, 1366:42, 1375:42</p> <p>assisted [1] - 1445:37</p> <p>associated [1] - 1403:23</p> <p>association [1] - 1351:44</p> <p>assume [10] - 1371:12, 1373:22, 1391:15, 1394:34, 1396:30, 1419:25, 1440:36, 1442:38</p> <p>assumed [5] - 1389:45, 1390:2, 1391:28, 1432:9, 1432:15</p> <p>assuming [1] - 1371:13</p> <p>assumption [2] - 1373:22, 1396:46</p> <p>assure [1] - 1448:18</p> <p>Attach [1] - 1363:18</p> <p>attached [1] - 1374:20</p> <p>attack [1] - 1444:26</p> <p>attempting [1] - 1364:43</p> <p>attended [1] - 1424:30</p> <p>attention [12] - 1359:34, 1375:15, 1380:1, 1383:26, 1384:25, 1399:39, 1417:23, 1418:18, 1418:42, 1426:19, 1428:23, 1447:17</p> <p>Attention [1] - 1383:9</p> <p>attitude [2] - 1381:26, 1421:8</p> <p>August [3] - 1425:18, 1427:36, 1436:10</p> <p>Australia [38] - 1345:13, 1345:22, 1345:25, 1345:35, 1346:1, 1346:29, 1346:33, 1346:36, 1346:45, 1347:14, 1349:30, 1350:23, 1350:26, 1351:6, 1351:34, 1351:45, 1352:8, 1352:15, 1352:22, 1352:47, 1353:7, 1353:45, 1357:13, 1362:19, 1362:24, 1362:30, 1364:22, 1367:46, 1368:3, 1368:22, 1368:29, 1369:18, 1369:22, 1369:39, 1379:23, 1387:17, 1436:42, 1437:5</p> <p>Australia's [1] - 1353:23</p> <p>Australian [12] - 1344:17, 1350:14, 1353:16, 1356:19, 1362:31, 1362:41, 1397:23, 1424:5, 1425:3, 1437:5, 1437:10, 1449:7</p> <p>authentication [1] -</p>
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<p>1417:18 authorisation [1] - 1365:35 authorise [1] - 1388:22 authorities [3] - 1384:47, 1389:40, 1392:44 authority [8] - 1367:31, 1368:32, 1369:17, 1369:21, 1369:25, 1373:21, 1396:38, 1443:42 automatically [2] - 1428:4, 1428:6 available [2] - 1346:10, 1426:15 average [1] - 1358:27 avoid [1] - 1433:31 avoiding [1] - 1373:33 awarded [5] - 1413:31, 1441:18, 1441:22, 1443:17, 1445:39 awarding [1] - 1361:20 aware [12] - 1360:34, 1362:26, 1363:46, 1372:29, 1388:29, 1406:16, 1415:22, 1429:20, 1429:27, 1429:35, 1431:11, 1435:43</p>	<p>1426:30 bankruptcy [2] - 1422:16, 1422:20 banks [1] - 1430:47 barcode [2] - 1384:27, 1409:8 barcoded [1] - 1348:7 Barcoded [3] - 1348:25, 1350:2, 1350:9 bargy [7] - 1406:5, 1407:9, 1407:44, 1411:23, 1411:32, 1439:40, 1440:3 Barker [7] - 1345:1, 1345:5, 1345:9, 1349:32, 1373:46, 1450:11, 1450:13 base [1] - 1379:13 based [2] - 1345:42, 1415:14 basing [1] - 1379:13 basis [16] - 1346:16, 1346:25, 1346:30, 1349:20, 1349:42, 1354:9, 1357:40, 1370:38, 1386:43, 1386:46, 1399:36, 1420:37, 1420:38, 1437:29, 1440:2, 1446:27 bear [7] - 1346:44, 1364:11, 1367:26, 1403:11, 1423:29, 1426:21, 1441:47 bears [2] - 1348:28, 1406:11 became [8] - 1355:9, 1360:8, 1360:34, 1362:26, 1363:46, 1426:15, 1429:35, 1435:43 become [2] - 1396:3, 1396:4 becoming [1] - 1403:13 beer [2] - 1399:17, 1399:19 began [1] - 1352:15 begin [1] - 1352:20 beginning [6] - 1404:32, 1424:17, 1429:36, 1437:34, 1442:39, 1444:11 behalf [19] - 1346:33, 1352:21, 1352:46, 1353:12, 1353:45, 1367:14, 1368:32, 1369:18, 1369:22, 1369:25, 1372:28, 1373:21, 1388:9, 1399:46, 1403:35, 1413:33, 1421:9, 1448:7, 1448:34 behind [1] - 1373:26 belief [1] - 1398:23 beliefs [2] - 1398:36, 1398:37</p>	<p>bells [2] - 1398:16, 1398:18 beneficiary [1] - 1389:16 benefit [2] - 1391:32, 1413:26 best [12] - 1367:21, 1368:43, 1376:32, 1376:33, 1376:45, 1377:1, 1378:9, 1384:32, 1406:2, 1411:14, 1411:21, 1430:36 bet [1] - 1396:43 better [2] - 1376:35, 1378:1 between [26] - 1346:1, 1346:20, 1353:29, 1357:15, 1368:42, 1369:29, 1372:38, 1378:39, 1386:25, 1388:30, 1399:45, 1407:21, 1407:34, 1407:37, 1407:40, 1408:11, 1411:22, 1415:13, 1418:2, 1426:5, 1430:30, 1432:33, 1439:45, 1441:14, 1444:19, 1446:28 bid [2] - 1400:19, 1439:33 bigger [1] - 1448:4 bills [1] - 1408:6 bit [7] - 1359:30, 1359:41, 1390:13, 1406:5, 1431:44, 1432:23, 1437:46 blame [1] - 1408:33 blank [1] - 1365:12 board [1] - 1371:5 bold [1] - 1431:44 Booie [1] - 1351:2 book [20] - 1359:20, 1364:3, 1364:12, 1374:19, 1374:31, 1374:40, 1380:8, 1394:14, 1397:35, 1409:35, 1410:14, 1414:37, 1415:26, 1415:32, 1415:46, 1416:13, 1426:21, 1428:45, 1439:1 books [11] - 1358:5, 1358:13, 1377:4, 1377:9, 1384:35, 1394:18, 1399:33, 1399:35, 1409:35, 1414:33, 1426:26 border [9] - 1371:21, 1431:16, 1433:31, 1433:33, 1433:40, 1434:18, 1435:39, 1447:19, 1447:22 boss [2] - 1406:13, 1416:2 bottom [9] - 1362:16,</p>	<p>1365:18, 1383:1, 1416:31, 1418:20, 1432:43, 1439:45, 1445:34, 1448:42 box [5] - 1382:4, 1382:8, 1382:14, 1382:27, 1435:14 break [2] - 1442:2, 1442:9 bribe [4] - 1398:5, 1400:22, 1402:18, 1402:21 bribery [3] - 1373:34, 1398:17, 1398:47 brief [2] - 1354:39, 1438:13 briefest [1] - 1345:16 briefly [6] - 1345:45, 1382:45, 1437:46, 1438:41, 1445:7, 1448:23 bring [4] - 1423:28, 1447:16, 1447:21, 1447:24 brought [6] - 1360:14, 1369:47, 1394:16, 1399:39, 1402:34, 1436:47 buddies [2] - 1361:19, 1386:4 buddy [6] - 1361:4, 1361:9, 1361:10 build [1] - 1379:27 built [1] - 1404:5 bundle [2] - 1349:31, 1367:23 business [37] - 1351:5, 1351:10, 1352:30, 1352:40, 1352:45, 1355:6, 1355:26, 1355:29, 1357:2, 1359:10, 1361:29, 1361:36, 1364:28, 1364:31, 1364:38, 1366:39, 1367:47, 1369:35, 1381:29, 1386:43, 1386:46, 1387:1, 1396:5, 1398:11, 1398:31, 1399:13, 1400:44, 1401:30, 1402:44, 1405:19, 1410:10, 1413:37, 1414:21, 1414:35, 1417:14, 1420:23, 1448:45 businessmen [2] - 1398:22, 1398:27 butylbromide [4] - 1345:26, 1346:4, 1356:27, 1382:15 Buyer [2] - 1372:38, 1386:25 buyers [1] - 1392:34 buying [1] - 1386:45</p>	<p style="text-align: center;">C</p> <p>calculated [4] - 1437:17, 1437:18, 1437:28, 1437:30 calculation [1] - 1436:24 Canada [6] - 1384:15, 1393:29, 1394:39, 1395:5, 1439:10, 1445:40 Canadian [2] - 1406:28, 1407:4 Canberra [1] - 1425:3 cannot [2] - 1409:14, 1430:33 capacity [1] - 1387:16 care [1] - 1390:39 career [1] - 1422:13 carefully [2] - 1384:29, 1431:46 cargo [3] - 1431:41, 1431:42, 1433:31 carried [2] - 1372:37, 1386:24 carry [2] - 1352:25, 1381:22 carrying [2] - 1379:5, 1381:21 case [23] - 1349:12, 1357:40, 1361:14, 1367:27, 1371:4, 1371:19, 1373:4, 1373:17, 1376:40, 1386:35, 1389:22, 1390:27, 1402:2, 1405:25, 1406:22, 1413:10, 1413:39, 1414:7, 1417:40, 1423:24, 1437:33, 1438:43 case-by-case [1] - 1357:40 caused [1] - 1437:32 Cba [4] - 1419:11, 1419:24, 1426:33, 1426:41 ceased [1] - 1354:31 cent [99] - 1346:7, 1346:11, 1354:14, 1358:28, 1358:32, 1358:35, 1359:16, 1366:2, 1366:25, 1375:26, 1376:26, 1376:38, 1377:15, 1377:21, 1377:24, 1377:43, 1379:28, 1380:3, 1380:13, 1380:25, 1380:29, 1388:38, 1388:45, 1389:9, 1390:19, 1390:27, 1390:32, 1391:19, 1391:25, 1391:37, 1392:1, 1392:24, 1392:43, 1393:1, 1393:8, 1393:30, 1393:44,</p>
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<p>1403:2, 1403:27, 1403:29, 1403:32, 1404:4, 1404:17, 1404:19, 1404:24, 1405:30, 1405:41, 1406:7, 1406:19, 1406:20, 1406:38, 1407:8, 1408:15, 1408:19, 1408:27, 1409:3, 1410:19, 1411:13, 1411:33, 1412:14, 1417:32, 1417:37, 1419:38, 1420:35, 1422:41, 1422:44, 1429:32, 1430:1, 1430:28, 1430:47, 1431:2, 1431:26, 1431:35, 1432:23, 1432:32, 1432:34, 1433:13, 1436:26, 1437:18, 1437:25, 1437:37, 1440:6, 1440:7, 1441:4, 1441:19, 1441:39, 1443:13, 1443:18, 1447:18, 1447:23, 1447:34, 1447:41, 1447:44, 1448:11, 1448:15, 1448:39, 1449:17</p> <p>cents [1] - 1447:21</p> <p>Certain[1] - 1344:17</p> <p>certain [11] - 1357:27, 1359:16, 1366:12, 1372:6, 1382:32, 1385:19, 1390:13, 1411:21, 1438:8, 1446:12</p> <p>Certainly[5] - 1358:12, 1358:35, 1366:37, 1392:36, 1442:5</p> <p>certainly [35] - 1348:1, 1357:40, 1360:8, 1361:22, 1361:28, 1361:35, 1362:30, 1367:24, 1369:20, 1373:36, 1382:39, 1384:20, 1385:39, 1387:24, 1388:6, 1398:30, 1398:43, 1408:20, 1408:32, 1410:34, 1413:8, 1413:21, 1413:23, 1413:45, 1414:9, 1419:45, 1428:16, 1430:15, 1441:41, 1447:20, 1448:41, 1449:18, 1449:20, 1449:21, 1449:25</p> <p>certainty [2] - 1382:41, 1412:5</p> <p>certificate [3] - 1428:11, 1432:7, 1432:10</p> <p>certificates [1] - 1432:2</p> <p>certified [1] - 1435:44</p> <p>certifying [1] - 1435:44</p>	<p>cetera [2] - 1370:26, 1408:7</p> <p>chance [4] - 1355:12, 1427:26, 1439:13, 1439:23</p> <p>change [3] - 1347:21, 1378:32, 1437:32</p> <p>changed [1] - 1352:27</p> <p>charges [3] - 1364:33, 1423:47, 1424:4</p> <p>chasing [1] - 1359:9</p> <p>cheap [1] - 1403:13</p> <p>check [1] - 1378:45</p> <p>checked [3] - 1378:31, 1382:42, 1384:29</p> <p>checking [1] - 1443:25</p> <p>chemicals [2] - 1367:9, 1432:14</p> <p>Chicago's [1] - 1392:32</p> <p>Chris[3] - 1346:41, 1347:22, 1408:47</p> <p>Christopher[5] - 1347:24, 1347:28, 1348:24, 1348:38, 1349:5</p> <p>Cif[7] - 1370:30, 1370:38, 1370:44, 1371:6, 1371:13, 1382:20</p> <p>circles [1] - 1398:31</p> <p>circumstance [1] - 1389:4</p> <p>circumstances [5] - 1391:9, 1391:24, 1393:12, 1409:16, 1412:42</p> <p>Cj[1] - 1420:5</p> <p>claim [5] - 1398:29, 1398:41, 1398:43, 1405:21, 1436:4</p> <p>claimed [1] - 1430:37</p> <p>Claims[1] - 1443:25</p> <p>claims [1] - 1422:13</p> <p>clarified [1] - 1405:1</p> <p>clarify [2] - 1382:7, 1419:47</p> <p>clause [2] - 1373:23, 1387:1</p> <p>clear [9] - 1369:6, 1397:8, 1397:12, 1397:18, 1397:25, 1410:12, 1410:13, 1414:15, 1441:33</p> <p>cleared [1] - 1406:40</p> <p>clearly [7] - 1376:32, 1386:42, 1386:45, 1398:39, 1414:29, 1435:2, 1441:30</p> <p>Clearly[1] - 1385:12</p> <p>close [5] - 1346:21, 1377:26, 1379:36, 1391:47, 1403:2</p> <p>closed [1] - 1360:20</p> <p>closely [1] - 1431:41</p> <p>Cole[1] - 1344:25</p> <p>Colin[1] - 1350:28</p>	<p>collect [1] - 1391:44</p> <p>coming [3] - 1355:40, 1393:19, 1408:10</p> <p>commence [1] - 1349:27</p> <p>commenced [1] - 1394:6</p> <p>commences [2] - 1349:36, 1416:11</p> <p>commencing [3] - 1345:8, 1400:40, 1432:42</p> <p>comment [5] - 1380:36, 1449:22, 1449:23, 1450:5, 1450:6</p> <p>comments [4] - 1380:19, 1380:38, 1381:27, 1396:4</p> <p>commercial [16] - 1353:28, 1367:45, 1368:22, 1368:29, 1368:42, 1369:1, 1369:7, 1369:29, 1370:23, 1373:17, 1387:16, 1404:36, 1444:31, 1444:32, 1446:27, 1446:31</p> <p>commission [94] - 1346:32, 1354:14, 1357:37, 1358:27, 1358:31, 1358:35, 1364:19, 1364:23, 1364:39, 1364:43, 1366:2, 1366:9, 1366:16, 1366:22, 1366:26, 1366:34, 1366:38, 1375:26, 1375:36, 1376:4, 1376:10, 1377:15, 1379:27, 1390:8, 1393:30, 1393:38, 1393:44, 1394:1, 1394:38, 1394:46, 1399:47, 1401:6, 1401:7, 1401:10, 1402:12, 1402:13, 1402:33, 1402:40, 1403:26, 1403:30, 1403:37, 1403:40, 1403:44, 1403:45, 1404:6, 1404:19, 1404:23, 1404:28, 1404:34, 1405:18, 1405:24, 1405:25, 1405:34, 1405:38, 1405:41, 1405:46, 1406:6, 1406:20, 1406:38, 1406:39, 1407:1, 1407:23, 1408:4, 1408:15, 1409:34, 1409:43, 1410:4, 1410:18, 1411:7, 1411:13, 1411:14, 1411:24, 1412:17, 1412:19, 1412:29, 1413:16, 1413:47, 1414:42, 1415:14, 1420:14,</p>	<p>1421:3, 1423:23, 1423:43, 1427:10, 1437:4, 1437:5, 1437:6, 1437:14, 1437:22, 1437:28, 1437:36, 1437:39, 1445:41, 1446:15</p> <p>Commission [3] - 1376:46, 1432:28, 1437:9</p> <p>Commissioner[72] - 1345:5, 1345:11, 1345:20, 1345:45, 1346:6, 1346:24, 1346:40, 1346:47, 1347:12, 1349:8, 1349:10, 1349:18, 1349:22, 1349:36, 1349:39, 1349:45, 1350:5, 1355:9, 1367:26, 1371:10, 1376:29, 1376:31, 1377:14, 1377:21, 1377:31, 1380:32, 1395:8, 1395:13, 1396:2, 1396:10, 1396:13, 1396:15, 1398:20, 1398:22, 1400:11, 1401:26, 1410:31, 1410:36, 1417:10, 1419:19, 1419:29, 1419:32, 1420:3, 1420:13, 1423:8, 1428:29, 1428:36, 1429:47, 1430:11, 1431:13, 1432:40, 1433:9, 1433:21, 1433:38, 1440:15, 1442:2, 1442:5, 1442:9, 1442:16, 1442:41, 1442:43, 1442:47, 1444:1, 1445:10, 1445:17, 1447:16, 1449:43, 1450:5, 1450:11, 1450:15, 1450:20, 1450:24</p> <p>commissions [8] - 1357:29, 1357:41, 1358:20, 1366:31, 1373:34, 1398:27, 1398:28, 1400:34</p> <p>commitment [3] - 1418:42, 1419:6, 1422:18</p> <p>committed [2] - 1371:47, 1372:1</p> <p>Committee[2] - 1345:21, 1444:36</p> <p>committee [2] - 1442:27, 1446:12</p> <p>commodity [2] - 1392:31</p> <p>common [8] - 1364:30, 1367:7, 1389:11, 1398:23, 1398:24, 1398:31, 1398:33,</p>	<p>1409:20</p> <p>Commonwealth[7] - 1426:34, 1427:14, 1427:35, 1428:13, 1436:9, 1436:13, 1436:17</p> <p>communicate [1] - 1424:44</p> <p>communicated [2] - 1406:9, 1408:35</p> <p>communicating [1] - 1395:32</p> <p>communication [1] - 1366:41</p> <p>communications [1] - 1425:7</p> <p>companies [8] - 1350:18, 1356:44, 1368:18, 1396:37, 1418:35, 1435:3, 1446:28, 1449:26</p> <p>Companies[1] - 1344:17</p> <p>company [87] - 1345:35, 1347:1, 1350:13, 1350:26, 1350:30, 1350:44, 1351:5, 1351:10, 1351:13, 1351:34, 1351:38, 1351:39, 1352:4, 1352:7, 1352:25, 1352:27, 1352:31, 1352:40, 1352:42, 1352:45, 1353:15, 1353:44, 1356:17, 1356:24, 1356:26, 1357:4, 1360:20, 1365:42, 1368:13, 1368:16, 1369:14, 1370:3, 1371:38, 1372:5, 1373:3, 1381:40, 1382:34, 1382:41, 1383:19, 1383:36, 1384:5, 1384:21, 1385:9, 1385:15, 1385:18, 1385:19, 1385:20, 1385:26, 1385:29, 1385:34, 1386:12, 1386:15, 1386:37, 1387:29, 1387:34, 1388:4, 1388:16, 1388:23, 1388:30, 1389:29, 1390:21, 1390:25, 1390:26, 1391:11, 1391:13, 1391:18, 1391:24, 1395:21, 1395:24, 1396:7, 1396:27, 1396:36, 1396:39, 1396:40, 1396:43, 1396:45, 1397:25, 1400:42, 1400:43, 1400:44, 1400:46, 1401:7, 1401:16, 1401:37, 1422:20, 1424:44, 1446:28</p>
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<p>Company [8] - 1346:2, 1350:14, 1353:16, 1381:41, 1382:25, 1392:23, 1396:24, 1418:2</p> <p>company's [1] - 1413:37</p> <p>competition [5] - 1439:14, 1439:23, 1439:29, 1440:30, 1440:33</p> <p>competitive [3] - 1379:7, 1379:19, 1392:12</p> <p>compiled [1] - 1349:29</p> <p>compiling [1] - 1386:21</p> <p>complain [2] - 1422:5, 1422:10</p> <p>complained [1] - 1408:3</p> <p>complete [2] - 1365:12, 1410:14</p> <p>completed [2] - 1363:18, 1434:2</p> <p>completeness [1] - 1436:16</p> <p>completing [2] - 1363:32, 1443:36</p> <p>compliance [1] - 1373:12</p> <p>comply [3] - 1381:46, 1387:2, 1387:3</p> <p>complying [1] - 1386:37</p> <p>Comprising [1] - 1350:8</p> <p>compromise [1] - 1411:15</p> <p>concede [1] - 1385:28</p> <p>concern [3] - 1386:41, 1421:5, 1447:42</p> <p>concerned [2] - 1411:12, 1432:8</p> <p>concerns [3] - 1371:32, 1425:24, 1425:28</p> <p>conclude [2] - 1363:11, 1417:14</p> <p>concluded [4] - 1407:39, 1410:23, 1411:23, 1420:23</p> <p>concludes [2] - 1349:37, 1450:15</p> <p>conclusion [4] - 1408:22, 1408:24, 1408:26, 1435:21</p> <p>condition [3] - 1372:9, 1373:2, 1373:12</p> <p>conditions [10] - 1369:43, 1370:2, 1370:12, 1375:10, 1381:46, 1382:18, 1386:20, 1386:30, 1387:41, 1391:3</p> <p>conduct [1] - 1361:43</p> <p>confess [3] - 1362:28, 1432:22, 1441:2</p> <p>confessed [1] - 1415:7</p> <p>confident [2] - 1417:13, 1447:34</p> <p>confidential [7] - 1349:15, 1349:19, 1349:20, 1349:42,</p>	<p>1350:6, 1396:7, 1396:8</p> <p>confidentiality [1] - 1396:16</p> <p>confirm [4] - 1366:15, 1366:22, 1407:1, 1435:33</p> <p>confirmation [2] - 1414:32, 1427:3</p> <p>confirmed [7] - 1375:30, 1375:36, 1407:8, 1408:14, 1409:2, 1409:42, 1410:5</p> <p>confirming [4] - 1393:29, 1406:21, 1409:38, 1414:46</p> <p>Confirming [1] - 1406:31</p> <p>confirms [1] - 1411:33</p> <p>confuse [1] - 1374:43</p> <p>confusing [1] - 1440:12</p> <p>Congrats [1] - 1422:33</p> <p>connection [1] - 1350:25</p> <p>connections [2] - 1357:1, 1386:1</p> <p>conscious [1] - 1373:29</p> <p>consequences [1] - 1369:38</p> <p>consider [1] - 1349:13</p> <p>considerable [2] - 1350:22, 1390:39</p> <p>considerably [1] - 1366:26</p> <p>consideration [2] - 1346:35, 1346:44</p> <p>considerations [1] - 1393:41</p> <p>consistent [9] - 1366:21, 1375:34, 1394:44, 1395:9, 1404:22, 1405:16, 1416:43, 1433:20, 1442:44</p> <p>Consistently [2] - 1382:18, 1440:26</p> <p>consistently [2] - 1404:31, 1406:47</p> <p>constant [3] - 1364:33, 1375:35, 1376:9</p> <p>constantly [1] - 1380:42</p> <p>constrained [1] - 1448:7</p> <p>construe [2] - 1369:3, 1413:18</p> <p>consul [1] - 1432:2</p> <p>consult [2] - 1362:42, 1392:7</p> <p>consulting [1] - 1379:4</p> <p>consummated [1] - 1438:4</p> <p>consummating [1] - 1443:36</p> <p>contact [10] - 1359:3, 1380:40, 1433:16, 1433:38, 1444:15, 1444:19, 1446:5, 1448:24, 1448:25, 1449:33</p> <p>contacted [3] - 1415:38, 1418:12, 1444:34</p>	<p>contacts [4] - 1357:1, 1358:7, 1416:7, 1437:47</p> <p>contain [1] - 1350:21</p> <p>contained [1] - 1418:32</p> <p>contains [2] - 1345:39, 1348:32</p> <p>contemporaneous [1] - 1409:39</p> <p>contemporaneously [2] - 1414:17, 1416:6</p> <p>content [1] - 1404:14</p> <p>contents [2] - 1349:14, 1390:46</p> <p>context [3] - 1359:46, 1408:10, 1416:23</p> <p>continue [1] - 1352:46</p> <p>continuing [3] - 1435:24, 1444:15, 1448:24</p> <p>contract [113] - 1345:25, 1345:26, 1345:28, 1345:31, 1346:1, 1346:4, 1346:5, 1346:8, 1346:17, 1346:18, 1350:27, 1356:10, 1356:30, 1357:19, 1358:25, 1358:39, 1358:42, 1361:25, 1374:3, 1380:25, 1381:5, 1382:10, 1382:13, 1388:29, 1388:45, 1389:9, 1390:19, 1390:26, 1391:36, 1393:19, 1400:18, 1400:38, 1401:11, 1407:13, 1407:27, 1407:28, 1407:38, 1407:41, 1409:12, 1409:13, 1409:47, 1410:13, 1410:23, 1411:25, 1411:40, 1411:41, 1411:46, 1413:31, 1414:46, 1415:20, 1415:39, 1416:22, 1416:47, 1417:8, 1417:36, 1418:1, 1418:2, 1418:13, 1419:17, 1419:22, 1419:30, 1419:35, 1420:19, 1420:32, 1420:43, 1421:32, 1421:37, 1421:41, 1422:2, 1422:6, 1422:11, 1422:16, 1422:22, 1422:29, 1422:45, 1424:9, 1424:27, 1425:13, 1426:15, 1427:42, 1430:45, 1432:1, 1433:2, 1436:26, 1438:1, 1438:14, 1438:28, 1438:32, 1439:34, 1439:42, 1440:40, 1440:45, 1441:10, 1441:17,</p>	<p>1441:18, 1441:22, 1441:24, 1441:40, 1442:27, 1442:35, 1443:3, 1443:7, 1443:17, 1443:31, 1443:32, 1443:37, 1443:44, 1444:4, 1444:20, 1444:44, 1445:31, 1445:39, 1448:15</p> <p>contracts [6] - 1359:43, 1361:20, 1363:27, 1369:13, 1405:6, 1447:23</p> <p>contractual [1] - 1363:11</p> <p>contrary [1] - 1422:26</p> <p>control [2] - 1370:16, 1412:46</p> <p>controlled [5] - 1346:28, 1352:30, 1372:26, 1393:19, 1436:41</p> <p>convenience [1] - 1349:34</p> <p>convenient [2] - 1410:32, 1410:34</p> <p>conversant [1] - 1361:36</p> <p>conversation [40] - 1358:10, 1358:46, 1359:3, 1359:21, 1359:31, 1360:39, 1361:39, 1361:42, 1364:15, 1365:3, 1366:11, 1366:12, 1373:41, 1374:7, 1374:14, 1374:18, 1375:1, 1375:46, 1376:44, 1377:11, 1381:33, 1382:46, 1394:12, 1397:3, 1397:28, 1398:7, 1399:19, 1400:14, 1402:35, 1407:33, 1408:40, 1408:44, 1409:33, 1411:39, 1417:45, 1432:17, 1440:2, 1440:26, 1447:30, 1447:33</p> <p>conversations [4] - 1364:9, 1397:19, 1399:15, 1409:33</p> <p>convert [1] - 1439:46</p> <p>converted [1] - 1356:27</p> <p>cooperate [1] - 1450:7</p> <p>cooperation [1] - 1449:39</p> <p>copies [10] - 1365:12, 1376:3, 1383:46, 1383:47, 1385:23, 1385:34, 1387:25, 1387:46, 1391:6, 1391:10</p> <p>copy [14] - 1347:4, 1348:42, 1349:31, 1359:24, 1359:29, 1365:9, 1365:43, 1394:17, 1416:12,</p>	<p>1424:27, 1425:13, 1434:40, 1440:43, 1442:21</p> <p>corner [4] - 1374:27, 1375:8, 1375:16, 1376:15</p> <p>correct [114] - 1347:45, 1348:5, 1350:29, 1350:35, 1351:8, 1351:11, 1351:12, 1351:31, 1351:36, 1351:42, 1352:5, 1352:9, 1352:13, 1352:33, 1353:4, 1353:42, 1354:1, 1354:20, 1355:37, 1355:38, 1356:8, 1359:1, 1361:11, 1363:47, 1364:8, 1365:25, 1366:17, 1371:1, 1371:22, 1371:26, 1371:30, 1373:13, 1375:37, 1375:44, 1376:2, 1376:11, 1376:12, 1376:35, 1376:45, 1377:41, 1383:18, 1383:42, 1383:43, 1383:47, 1388:13, 1388:32, 1388:40, 1389:23, 1393:45, 1394:9, 1394:22, 1394:28, 1395:26, 1397:6, 1400:1, 1400:6, 1402:41, 1403:33, 1403:42, 1404:1, 1404:8, 1404:25, 1404:45, 1405:3, 1405:9, 1405:20, 1405:26, 1407:10, 1407:24, 1408:16, 1408:28, 1409:36, 1410:11, 1411:34, 1411:47, 1412:1, 1412:15, 1412:30, 1413:1, 1413:12, 1413:27, 1415:1, 1415:46, 1420:21, 1420:46, 1421:39, 1423:18, 1425:26, 1425:31, 1426:2, 1434:27, 1435:16, 1435:40, 1436:20, 1436:43, 1437:7, 1437:11, 1438:17, 1438:29, 1438:32, 1438:36, 1439:1, 1439:26, 1440:40, 1442:36, 1445:1, 1445:27, 1445:43, 1445:47, 1446:7, 1446:40, 1449:14, 1449:30, 1449:35</p> <p>Correct [27] - 1351:20, 1355:10, 1355:34, 1358:36, 1361:12, 1363:8, 1365:16,</p>
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<p>1366:18, 1368:45, 1369:31, 1371:2, 1379:29, 1382:11, 1387:30, 1392:13, 1393:31, 1393:34, 1394:3, 1396:35, 1411:20, 1411:35, 1412:11, 1414:43, 1426:3, 1433:3, 1437:12, 1438:44</p> <p>corresponded [1] - 1425:33</p> <p>correspondence [14] - 1357:32, 1384:35, 1386:24, 1399:33, 1400:4, 1405:11, 1406:11, 1409:38, 1414:41, 1426:5, 1445:3, 1445:8, 1449:2, 1449:38</p> <p>correspondence...etc [1] - 1372:37</p> <p>corruption [2] - 1373:35, 1398:17</p> <p>cost [5] - 1364:32, 1370:44, 1371:7, 1426:40</p> <p>costs [4] - 1364:28, 1364:37, 1381:29, 1382:21</p> <p>Cotechna [1] - 1435:44</p> <p>Council [1] - 1372:18</p> <p>counsel [8] - 1345:2, 1345:12, 1345:14, 1345:17, 1362:29, 1399:37, 1427:25</p> <p>counsel's [1] - 1345:11</p> <p>counter [1] - 1404:17</p> <p>countries [10] - 1355:45, 1356:1, 1356:6, 1356:42, 1356:45, 1357:3, 1367:7, 1367:11, 1396:37, 1398:32</p> <p>country [5] - 1367:9, 1368:3, 1368:25, 1371:7, 1432:11</p> <p>couple [7] - 1357:35, 1359:34, 1362:12, 1370:19, 1371:44, 1401:4, 1438:41</p> <p>courier [5] - 1365:30, 1382:42, 1384:21, 1418:21, 1418:22</p> <p>Courier [1] - 1418:38</p> <p>couriered [1] - 1383:19</p> <p>couriers [1] - 1383:16</p> <p>course [30] - 1346:9, 1346:18, 1347:5, 1363:4, 1363:26, 1363:46, 1365:47, 1369:41, 1371:20, 1393:37, 1403:40, 1405:13, 1410:25, 1412:7, 1412:27, 1413:11, 1415:24,</p>	<p>1417:40, 1418:8, 1424:4, 1425:33, 1426:10, 1427:18, 1431:9, 1435:43, 1435:47, 1436:45, 1440:39, 1445:45, 1449:11</p> <p>court [1] - 1394:18</p> <p>Court [1] - 1344:30</p> <p>created [2] - 1435:6, 1445:38</p> <p>credit [9] - 1406:41, 1427:8, 1427:40, 1427:41, 1428:12, 1432:2, 1436:5, 1436:15, 1436:40</p> <p>Crompton [1] - 1351:1</p> <p>crop [1] - 1355:14</p> <p>cross [3] - 1381:2, 1381:17, 1398:2</p> <p>Crumpton [12] - 1347:11, 1347:13, 1347:16, 1350:28, 1350:35, 1350:38, 1350:41, 1351:45, 1352:3, 1352:21, 1353:10, 1354:4</p> <p>Crumptons [5] - 1357:14, 1405:12, 1436:46, 1437:34, 1437:41</p> <p>cryptic [3] - 1376:33, 1377:5, 1378:9</p> <p>currency [4] - 1422:22, 1422:23, 1437:10, 1439:41</p> <p>current [5] - 1346:19, 1347:35, 1350:11, 1372:36, 1403:5</p> <p>customer [3] - 1389:14, 1396:4, 1419:46</p> <p>customers [2] - 1365:42, 1392:36</p> <p>cute [1] - 1385:28</p>	<p>1445:30</p> <p>day-to-day [3] - 1352:40, 1353:6, 1354:9</p> <p>days [11] - 1365:2, 1366:10, 1375:46, 1381:33, 1394:13, 1394:31, 1399:32, 1399:37, 1400:39, 1407:13, 1442:30</p> <p>dcts [1] - 1434:19</p> <p>deal [19] - 1380:44, 1387:17, 1403:36, 1406:6, 1406:8, 1408:47, 1421:8, 1421:11, 1421:12, 1421:13, 1422:15, 1424:13, 1437:45, 1438:8, 1439:24, 1440:7, 1445:13, 1445:36</p> <p>dealing [16] - 1354:12, 1354:42, 1356:6, 1357:35, 1358:24, 1362:9, 1364:35, 1373:39, 1390:36, 1407:42, 1413:38, 1418:31, 1427:34, 1442:38, 1447:24, 1448:24</p> <p>dealings [7] - 1357:46, 1358:15, 1381:25, 1416:6, 1427:14, 1444:31, 1444:32</p> <p>deals [8] - 1419:29, 1419:30, 1419:34, 1419:38, 1422:22, 1426:29</p> <p>dealt [2] - 1406:8, 1426:34</p> <p>December [13] - 1348:2, 1376:31, 1391:47, 1399:36, 1425:39, 1425:43, 1430:33, 1432:27, 1432:31, 1434:47, 1443:42, 1444:2, 1448:3</p> <p>decide [1] - 1360:46</p> <p>decision [2] - 1361:10, 1380:43</p> <p>decision-making [1] - 1380:43</p> <p>decisions [1] - 1361:5</p> <p>declaration [3] - 1346:46, 1347:10, 1347:11</p> <p>Declaration [2] - 1347:7, 1347:16</p> <p>declarations [3] - 1346:43, 1346:46, 1347:39</p> <p>declared [3] - 1347:11, 1347:38, 1347:44</p> <p>Declared [4] - 1347:17, 1348:25, 1348:39, 1349:6</p> <p>decline [3] - 1421:37,</p>	<p>1422:6, 1422:29</p> <p>deduct [1] - 1440:1</p> <p>deducting [1] - 1437:29</p> <p>definitely [1] - 1385:16</p> <p>degree [1] - 1374:35</p> <p>delay [2] - 1345:7, 1433:31</p> <p>delaying [1] - 1345:9</p> <p>delays [2] - 1425:46, 1425:47</p> <p>delegate [1] - 1362:22</p> <p>delivered [5] - 1371:15, 1385:7, 1430:3, 1434:42, 1434:46</p> <p>delivering [2] - 1382:21, 1431:15</p> <p>delivery [2] - 1370:28, 1430:7</p> <p>demand [1] - 1432:19</p> <p>demanded [1] - 1401:6</p> <p>demanding [1] - 1401:45</p> <p>demands [1] - 1405:46</p> <p>demonstrated [2] - 1436:8, 1448:45</p> <p>demurrage [1] - 1434:7</p> <p>denied [1] - 1447:32</p> <p>denies [1] - 1345:36</p> <p>Department [8] - 1363:33, 1363:39, 1424:23, 1424:40, 1424:45, 1425:12, 1425:34, 1432:3</p> <p>department [3] - 1425:2, 1426:6, 1426:35</p> <p>depreciated [1] - 1403:1</p> <p>derived [1] - 1386:30</p> <p>derogatory [1] - 1355:3</p> <p>described [9] - 1350:11, 1354:47, 1373:16, 1381:40, 1382:9, 1418:4, 1418:47, 1433:39, 1440:29</p> <p>describes [1] - 1400:37</p> <p>description [1] - 1373:20</p> <p>desert [2] - 1431:40, 1432:36</p> <p>Desk [1] - 1363:38</p> <p>destination [1] - 1371:8</p> <p>detail [4] - 1350:22, 1424:4, 1435:35, 1435:36</p> <p>detailed [4] - 1358:40, 1431:46, 1446:25, 1446:31</p> <p>details [6] - 1365:13, 1370:29, 1423:36, 1427:40, 1445:30, 1446:42</p> <p>develop [3] - 1357:5, 1357:8, 1357:9</p> <p>developments [1] - 1434:20</p> <p>Dhakar [1] - 1371:14</p> <p>Dhl [2] - 1418:21, 1418:22</p> <p>diary [1] - 1408:42</p>	<p>difference [5] - 1357:15, 1410:13, 1439:45, 1441:14</p> <p>different [6] - 1382:8, 1392:36, 1394:7, 1414:8, 1415:44, 1442:20</p> <p>difficulties [2] - 1383:16, 1445:38</p> <p>difficulty [3] - 1374:35, 1400:35, 1437:42</p> <p>direct [18] - 1359:34, 1371:44, 1373:4, 1375:15, 1380:1, 1383:17, 1384:7, 1384:21, 1384:25, 1386:43, 1386:46, 1398:30, 1417:22, 1418:18, 1418:41, 1426:47, 1428:7, 1428:23</p> <p>directed [4] - 1428:4, 1428:6, 1447:17</p> <p>directing [1] - 1436:17</p> <p>direction [2] - 1349:23, 1427:1</p> <p>directions [1] - 1427:2</p> <p>directly [15] - 1356:44, 1372:38, 1383:36, 1384:40, 1384:45, 1385:14, 1385:17, 1385:20, 1385:23, 1385:26, 1385:29, 1386:25, 1387:29, 1424:44, 1427:10</p> <p>director [40] - 1350:13, 1350:17, 1351:33, 1352:8, 1352:35, 1352:38, 1352:43, 1360:41, 1360:45, 1361:3, 1361:14, 1380:41, 1380:46, 1395:43, 1397:4, 1397:9, 1397:10, 1397:16, 1397:20, 1397:22, 1397:24, 1397:26, 1397:28, 1397:33, 1397:42, 1397:46, 1398:3, 1398:16, 1399:24, 1400:32, 1400:37, 1401:43, 1402:5, 1402:14, 1402:18, 1402:19, 1405:21, 1442:28</p> <p>Director [2] - 1359:36, 1397:20</p> <p>directors [9] - 1347:13, 1350:26, 1350:30, 1350:44, 1354:3, 1369:8, 1397:18, 1436:41, 1436:45</p> <p>disagree [2] - 1398:45, 1399:23</p> <p>disbelieved [1] - 1399:2</p> <p>disbursements [2] -</p>
D				
	<p>daily [2] - 1358:6, 1407:47</p> <p>date [19] - 1347:47, 1348:28, 1367:26, 1374:27, 1374:44, 1393:43, 1394:31, 1400:12, 1407:21, 1407:41, 1408:11, 1409:47, 1411:31, 1411:39, 1416:15, 1418:19, 1423:3, 1442:37, 1443:3</p> <p>Dated [1] - 1375:46</p> <p>dated [8] - 1346:3, 1374:13, 1374:36, 1393:40, 1394:15, 1426:29, 1427:35, 1445:25</p> <p>dates [6] - 1345:17, 1374:32, 1407:34, 1411:30, 1431:38,</p>			

<p>1345:28, 1436:14 discharge [2] - 1371:10, 1371:12 disclosed [3] - 1430:32, 1435:19, 1448:16 discovered [2] - 1390:18, 1391:27 discrepancy [3] - 1430:30, 1430:31, 1436:32 discuss [2] - 1364:15, 1388:19 discussed [10] - 1364:23, 1375:34, 1377:16, 1388:25, 1389:15, 1390:43, 1406:12, 1445:31, 1447:29, 1448:29 discussing [7] - 1375:12, 1375:25, 1382:46, 1389:39, 1420:9, 1421:32, 1438:14 discussion [26] - 1359:13, 1364:2, 1364:4, 1364:16, 1364:26, 1364:45, 1376:17, 1379:42, 1389:43, 1389:44, 1391:46, 1400:17, 1404:27, 1405:16, 1407:21, 1408:11, 1411:11, 1417:31, 1417:44, 1427:6, 1428:43, 1429:9, 1439:6, 1440:18, 1446:9, 1447:26 discussions [28] - 1360:16, 1364:21, 1364:37, 1364:39, 1366:35, 1372:8, 1387:38, 1388:24, 1390:16, 1391:35, 1393:23, 1394:6, 1399:45, 1400:5, 1402:31, 1404:33, 1408:22, 1408:24, 1409:18, 1410:3, 1411:6, 1416:7, 1429:14, 1429:35, 1429:43, 1435:23, 1435:24, 1444:20 disk [1] - 1418:34 dispatch [1] - 1370:29 dispatched [1] - 1394:13 dissatisfied [1] - 1421:10 distributing [1] - 1355:27 distribution [4] - 1362:42, 1362:44, 1362:47, 1363:1 division [1] - 1397:21 document [119] - 1347:3, 1347:46, 1348:42, 1349:2, 1353:27, 1357:22, 1357:31, 1357:39, 1360:13, 1360:15, 1360:24,</p>	<p>1361:47, 1362:2, 1362:13, 1362:15, 1362:35, 1365:23, 1365:47, 1366:47, 1367:14, 1367:19, 1367:20, 1367:21, 1367:24, 1367:34, 1367:37, 1368:21, 1368:33, 1369:6, 1369:42, 1369:47, 1370:1, 1370:7, 1370:9, 1370:43, 1371:24, 1371:45, 1372:24, 1372:33, 1373:15, 1373:23, 1374:17, 1374:22, 1375:10, 1375:11, 1377:39, 1381:34, 1381:36, 1381:41, 1381:45, 1381:47, 1382:19, 1382:31, 1382:32, 1383:40, 1383:43, 1383:47, 1386:18, 1386:21, 1386:31, 1387:42, 1387:43, 1388:4, 1388:11, 1389:38, 1390:1, 1390:21, 1390:25, 1391:14, 1391:18, 1393:27, 1394:47, 1402:33, 1402:35, 1404:33, 1404:43, 1405:28, 1410:11, 1415:4, 1415:5, 1415:12, 1418:8, 1418:21, 1421:20, 1421:25, 1423:16, 1423:25, 1423:26, 1423:31, 1423:40, 1423:45, 1426:39, 1427:27, 1427:34, 1427:35, 1428:19, 1431:3, 1432:19, 1432:40, 1434:10, 1434:25, 1435:7, 1435:10, 1435:39, 1436:9, 1436:13, 1436:16, 1436:46, 1439:37, 1440:9, 1440:22, 1440:38, 1440:44, 1442:43, 1443:41, 1445:19, 1445:20, 1445:22 documentary [4] - 1357:46, 1358:21, 1414:35, 1415:8 documentation [4] - 1363:18, 1369:17, 1386:7, 1435:47 documented [7] - 1357:30, 1357:40, 1394:46, 1404:10, 1410:20, 1410:22, 1410:27 documenting [1] - 1404:27 documents [55] -</p>	<p>1345:43, 1347:2, 1349:28, 1349:29, 1349:32, 1349:40, 1349:41, 1350:5, 1362:8, 1367:23, 1373:40, 1375:5, 1376:2, 1382:35, 1383:14, 1383:42, 1384:4, 1384:17, 1384:20, 1384:35, 1384:40, 1385:6, 1385:25, 1385:33, 1386:12, 1386:15, 1386:36, 1387:33, 1387:36, 1395:9, 1400:3, 1400:26, 1410:12, 1415:7, 1416:32, 1418:21, 1418:32, 1418:33, 1418:35, 1419:45, 1421:22, 1423:1, 1423:15, 1424:36, 1425:16, 1431:47, 1432:5, 1432:13, 1433:47, 1438:42, 1439:42, 1444:12, 1447:47, 1448:2, 1448:5 Documents [3] - 1350:2, 1350:8, 1394:25 dollar [8] - 1346:20, 1378:39, 1395:41, 1421:15, 1437:10, 1439:43, 1439:46, 1440:4 dollars [12] - 1345:32, 1376:21, 1376:39, 1377:31, 1378:3, 1379:34, 1397:15, 1397:32, 1398:3, 1398:15, 1437:5, 1439:47 domestic [2] - 1355:26, 1355:27 done [21] - 1367:11, 1368:38, 1371:41, 1376:32, 1376:45, 1376:47, 1377:1, 1387:17, 1392:18, 1397:39, 1400:43, 1406:47, 1412:25, 1417:25, 1424:32, 1424:34, 1428:11, 1442:29, 1446:18, 1447:34 dot [4] - 1362:38, 1363:10, 1363:15, 1363:36 doubt [4] - 1360:35, 1401:41, 1411:46, 1419:25 doubts [2] - 1389:47, 1390:5 down [16] - 1359:36, 1362:36, 1370:35, 1375:8, 1380:8, 1383:8,</p>	<p>1394:21, 1399:29, 1415:31, 1418:28, 1427:39, 1430:36, 1432:27, 1436:22, 1437:4, 1445:23 draft [1] - 1383:43 dried [1] - 1426:2 driver [2] - 1433:32, 1434:18 drivers [1] - 1380:21 Drugs [5] - 1346:2, 1381:41, 1382:26, 1396:24, 1418:3 duboisia [5] - 1351:11, 1351:13, 1351:14, 1351:15, 1351:17 due [20] - 1346:8, 1346:17, 1347:5, 1363:4, 1363:26, 1365:47, 1369:41, 1371:20, 1410:25, 1413:10, 1418:8, 1424:4, 1425:33, 1426:10, 1427:18, 1435:43, 1435:47, 1436:45, 1440:39, 1449:11 duly [1] - 1430:42 during [6] - 1354:25, 1398:6, 1429:35, 1442:9, 1444:2, 1444:24</p>	<p>Either [1] - 1402:17 electronic [1] - 1449:6 eligible [1] - 1362:44 email [30] - 1382:36, 1406:23, 1423:32, 1423:33, 1431:19, 1431:37, 1431:43, 1432:10, 1432:24, 1432:28, 1432:29, 1432:44, 1433:14, 1433:26, 1433:43, 1434:14, 1434:41, 1445:3, 1445:24, 1446:4, 1446:39, 1447:15, 1447:26, 1447:29, 1447:35, 1448:29, 1449:1, 1449:6, 1449:11 emailing [1] - 1433:27 emails [9] - 1349:16, 1431:14, 1432:42, 1432:43, 1444:25, 1445:11, 1445:21, 1447:16, 1449:20 emerged [1] - 1409:23 employ [1] - 1354:26 employed [3] - 1354:27, 1354:28, 1368:23 employee [3] - 1347:1, 1369:14, 1369:19 employees [2] - 1346:37, 1354:42 employment [1] - 1354:31 encouraged [1] - 1416:3 end [14] - 1354:32, 1360:34, 1403:2, 1409:41, 1411:32, 1411:38, 1414:10, 1422:24, 1425:38, 1427:29, 1428:14, 1443:45, 1444:14, 1444:21 endeavour [12] - 1350:23, 1357:21, 1357:38, 1357:45, 1358:3, 1358:13, 1358:19, 1376:43, 1381:45, 1404:33, 1416:14, 1424:12 endeavoured [2] - 1386:20, 1387:41 endeavouring [4] - 1379:19, 1379:26, 1379:31, 1405:18 ensure [3] - 1378:23, 1379:6, 1384:29 ensuring [1] - 1394:45 entailed [1] - 1363:31 enter [3] - 1357:21, 1357:36, 1432:11 entered [17] - 1346:1, 1346:18, 1350:27, 1356:10, 1358:39, 1388:30, 1409:46, 1413:15, 1414:46,</p>
E				
<p>early [10] - 1352:41, 1354:28, 1364:20, 1364:27, 1364:29, 1417:6, 1425:39, 1434:3, 1444:34 earned [1] - 1403:46 earning [1] - 1437:43 East [7] - 1356:2, 1356:7, 1363:39, 1397:20, 1398:24, 1398:26, 1398:32 easy [2] - 1414:30, 1414:31 economically [1] - 1357:8 ecstatic [3] - 1420:20, 1420:22, 1420:28 effect [9] - 1367:31, 1398:41, 1404:18, 1415:25, 1417:44, 1423:9, 1429:21, 1429:31, 1448:40 effected [1] - 1427:18 effectively [1] - 1404:39 efficient [1] - 1357:8 efficiently [1] - 1358:8 either [8] - 1347:20, 1349:12, 1362:3, 1399:2, 1422:41, 1424:33, 1441:26, 1444:34</p>				

<p>1415:17, 1420:42, 1420:45, 1421:23, 1421:43, 1438:4, 1438:28, 1441:34 entering [3] - 1413:14, 1413:30, 1413:46 Enterprises [2] - 1367:44, 1368:14 entire [3] - 1380:38, 1381:25, 1434:46 entirely [4] - 1405:42, 1412:41, 1413:16, 1431:44 entities [2] - 1346:27, 1370:16 entitled [6] - 1401:5, 1407:27, 1409:11, 1422:1, 1422:3, 1430:28 entity [4] - 1351:29, 1358:40, 1381:37, 1381:40 entries [1] - 1415:46 entry [5] - 1419:20, 1419:29, 1419:34, 1419:41, 1439:5 envelope [3] - 1383:20, 1383:21, 1383:22 envelopes [1] - 1383:20 equal [1] - 1376:29 equals [1] - 1376:16 equivalent [1] - 1421:15 erroneous [1] - 1368:37 erroneously [1] - 1368:36 error [1] - 1374:33 escrow [2] - 1372:25, 1372:28 esp [1] - 1376:3 establish [2] - 1346:25, 1369:21 established [2] - 1360:39, 1441:9 estimated [1] - 1437:4 et [1] - 1408:7 Et [1] - 1370:26 etc [1] - 1386:24 Euro [18] - 1346:20, 1370:39, 1378:39, 1390:11, 1392:1, 1403:1, 1403:24, 1418:5, 1421:38, 1422:7, 1422:30, 1428:37, 1430:21, 1436:29, 1439:23, 1439:44, 1439:45, 1440:27 Euros [7] - 1346:5, 1346:8, 1346:17, 1346:27, 1376:22, 1376:23, 1377:29, 1377:31, 1377:33, 1377:43, 1378:22, 1378:40, 1378:41, 1379:36, 1382:4, 1388:11, 1388:34,</p>	<p>1388:44, 1388:46, 1389:8, 1389:27, 1392:1, 1392:19, 1392:37, 1393:4, 1403:12, 1407:29, 1409:14, 1409:43, 1412:8, 1412:20, 1412:24, 1413:7, 1415:40, 1419:1, 1419:7, 1419:9, 1420:18, 1420:19, 1421:46, 1423:6, 1423:35, 1427:41, 1428:1, 1428:26, 1429:5, 1429:11, 1430:20, 1430:27, 1430:29, 1430:32, 1430:34, 1430:44, 1434:33, 1435:15, 1436:18, 1439:31, 1439:46, 1440:28, 1440:29, 1440:35, 1440:46, 1442:31, 1443:4, 1443:8, 1443:12, 1443:17, 1443:23, 1445:41 event [4] - 1379:41, 1405:45, 1423:39, 1440:17 events [5] - 1350:45, 1361:37, 1405:13, 1414:19, 1441:15 eventuate [1] - 1382:10 evidence [36] - 1345:46, 1345:47, 1346:6, 1346:15, 1346:24, 1346:30, 1346:40, 1347:2, 1347:20, 1354:3, 1354:31, 1373:38, 1376:42, 1380:47, 1382:30, 1393:23, 1393:39, 1405:17, 1407:18, 1408:39, 1409:22, 1409:41, 1411:6, 1411:10, 1418:11, 1421:21, 1421:33, 1432:27, 1435:18, 1435:21, 1438:15, 1446:2, 1447:17, 1448:20, 1449:13, 1450:16 evidences [1] - 1376:9 exact [1] - 1411:20 exactly [9] - 1378:19, 1381:22, 1396:35, 1408:43, 1409:15, 1409:42, 1414:8, 1441:3, 1441:19 Examination [1] - 1347:26 example [3] - 1406:2, 1446:29, 1447:9 examples [1] - 1366:20 exceed [1] - 1358:32 exceeded [1] - 1424:4</p>	<p>Excel [2] - 1418:30, 1418:32 except [2] - 1360:1, 1401:1 exception [3] - 1380:40, 1380:46, 1397:27 exchange [10] - 1346:19, 1378:39, 1379:16, 1379:34, 1392:31, 1392:32, 1421:15, 1432:42, 1447:16, 1449:1 exchanges [1] - 1450:2 exclusively [3] - 1355:37, 1356:37, 1356:43 execute [1] - 1428:15 executed [4] - 1368:33, 1427:20, 1427:28, 1427:30 executive [1] - 1352:41 exert [1] - 1361:18 exhibit [5] - 1349:15, 1349:23, 1349:46, 1350:6, 1400:27 Exhibit [8] - 1347:7, 1347:16, 1348:24, 1348:38, 1349:5, 1350:2, 1350:8, 1350:9 exist [1] - 1357:31 expanded [1] - 1432:41 expect [3] - 1368:36, 1388:15, 1414:10 expectation [1] - 1423:43 expected [6] - 1388:3, 1388:9, 1398:20, 1414:5, 1420:36, 1420:38 expense [4] - 1405:19, 1430:37, 1430:41, 1430:42 expenses [11] - 1364:38, 1380:20, 1380:24, 1380:33, 1381:12, 1381:22, 1381:28, 1398:29, 1408:6, 1408:25 expensive [1] - 1364:30 experience [3] - 1355:41, 1356:32, 1389:4 experienced [6] - 1355:2, 1356:5, 1357:45, 1358:18, 1391:42, 1404:32 explain [5] - 1373:15, 1376:46, 1399:8, 1436:33, 1439:38 explained [4] - 1426:46, 1429:37, 1432:22, 1447:27 explanation [14] - 1378:1, 1378:7, 1378:9, 1385:40, 1389:21, 1392:28, 1402:8, 1402:15, 1415:3, 1415:5, 1415:11, 1415:17, 1415:21,</p>	<p>1448:14 explicit [1] - 1398:9 explicitly [1] - 1388:24 explore [1] - 1388:43 export [6] - 1356:37, 1356:41, 1362:20, 1362:23, 1362:32, 1362:37 exporting [3] - 1355:28, 1355:37, 1356:42 Exporting [1] - 1355:28 exports [1] - 1362:19 Express [5] - 1383:2, 1383:9, 1383:31, 1383:35, 1384:45 expressed [1] - 1449:25 expressly [1] - 1388:22 extension [3] - 1434:17, 1434:26, 1434:44 extent [3] - 1376:43, 1395:3, 1438:8 external [1] - 1352:42 extract [4] - 1391:38, 1393:12, 1401:16, 1421:2 extracting [1] - 1373:33 extremely [3] - 1355:2, 1431:37, 1432:8 eyes [5] - 1391:31, 1399:11, 1399:12, 1402:27, 1429:3</p>	<p>1401:41 fame [1] - 1422:13 familiar [1] - 1416:38 family [6] - 1351:1, 1351:45, 1352:3, 1352:22, 1353:10, 1354:4 far [6] - 1352:11, 1385:39, 1385:41, 1401:23, 1421:21, 1435:20 farmer [3] - 1350:12, 1355:9, 1355:10 Farmer [1] - 1347:36 fashion [1] - 1419:43 fat [1] - 1403:36 fax [1] - 1364:47, 1365:6, 1365:9, 1367:30, 1375:18, 1375:41, 1383:39, 1387:46, 1405:8, 1406:24, 1436:17 fax/e [1] - 1447:1 fax/e-mail [1] - 1447:1 faxed [3] - 1365:23, 1404:43, 1432:9 feat [1] - 1441:39 February [5] - 1374:28, 1374:36, 1375:2, 1445:25, 1446:38 Federal [1] - 1356:19 fee [15] - 1354:19, 1354:22, 1423:9, 1429:33, 1430:2, 1431:2, 1447:5, 1447:9, 1447:10, 1447:31, 1447:41, 1447:44, 1448:11, 1448:39, 1449:17 fees [6] - 1345:33, 1345:34, 1345:41, 1346:11, 1364:33, 1430:13 fellow [2] - 1399:17, 1408:4 felt [3] - 1369:38, 1448:3, 1448:44 few [3] - 1392:33, 1392:34, 1442:29 figure [17] - 1345:27, 1346:16, 1346:21, 1377:17, 1377:26, 1378:12, 1379:33, 1379:37, 1392:41, 1410:22, 1411:40, 1411:46, 1413:6, 1413:8, 1436:25, 1443:18 figures [9] - 1345:17, 1345:40, 1345:41, 1345:42, 1376:16, 1428:40, 1430:20, 1430:25, 1439:39 file [9] - 1357:32, 1360:12, 1360:15, 1419:15, 1419:16,</p>
		F		
		<p>face [3] - 1345:26, 1345:31, 1430:10 facetious [1] - 1423:46 facilitate [2] - 1361:28, 1398:11 facsimile [3] - 1347:4, 1366:33, 1375:18 fact [26] - 1345:47, 1350:17, 1356:16, 1373:17, 1374:33, 1376:22, 1381:33, 1390:20, 1390:39, 1392:37, 1393:17, 1401:34, 1409:32, 1411:12, 1414:3, 1421:1, 1427:18, 1435:36, 1441:3, 1441:15, 1446:11, 1448:1, 1448:14, 1448:46, 1449:33 factored [1] - 1393:33 facts [1] - 1346:44 fair [4] - 1373:20, 1396:43, 1399:1, 1432:17 fairly [10] - 1349:10, 1367:10, 1389:3, 1398:39, 1399:33, 1409:41, 1417:47, 1420:19, 1431:2, 1445:7 faith [2] - 1401:39,</p>		

<p>1419:26, 1423:25 files [9] - 1358:1, 1359:5, 1384:36, 1399:33, 1399:44, 1400:4, 1415:26, 1443:41 fill [3] - 1365:29, 1366:42, 1367:5 filled [2] - 1365:14, 1367:1 final [10] - 1345:20, 1345:23, 1345:24, 1345:30, 1346:22, 1375:5, 1410:22, 1411:24, 1414:1, 1435:29 finally [3] - 1442:20, 1443:30, 1449:32 Finally[1] - 1348:41 findings [1] - 1449:8 finishing [1] - 1400:41 firm [1] - 1448:43 First[1] - 1348:24 first [31] - 1346:45, 1347:42, 1348:5, 1348:7, 1358:41, 1359:27, 1362:1, 1366:8, 1366:46, 1366:47, 1375:47, 1382:8, 1383:20, 1389:26, 1390:10, 1402:33, 1407:18, 1411:31, 1416:14, 1418:17, 1424:22, 1430:32, 1431:44, 1436:23, 1437:29, 1439:5, 1441:30, 1445:23, 1447:31 Firstly[7] - 1345:20, 1350:25, 1359:35, 1370:20, 1375:16, 1430:19, 1446:42 firstly [13] - 1345:7, 1346:42, 1350:28, 1352:16, 1357:35, 1362:42, 1374:23, 1400:9, 1403:41, 1405:35, 1415:45, 1429:22, 1438:46 fish [1] - 1448:4 fishing [1] - 1448:44 fit [1] - 1409:26 five [3] - 1348:32, 1376:47, 1400:39 fix [2] - 1432:21 fixed [1] - 1357:27 flat [1] - 1354:14 flexible [1] - 1366:29 floating [1] - 1368:18 flown [1] - 1371:19 fluctuations [1] - 1439:41 Fob[1] - 1371:5 focus [5] - 1355:29, 1431:43, 1432:24, 1432:34, 1434:46 focused [3] - 1407:36,</p>	<p>1432:34, 1432:35 folder [1] - 1374:5 follow [3] - 1381:46, 1386:20, 1387:41 Following[2] - 1361:42, 1366:41 following [10] - 1359:4, 1364:2, 1384:40, 1419:19, 1431:40, 1433:14, 1433:43, 1434:41, 1435:38, 1437:47 follows [3] - 1372:34, 1428:24, 1441:8 food [21] - 1344:18, 1345:37, 1346:12, 1351:29, 1359:47, 1360:3, 1360:29, 1360:47, 1361:20, 1361:33, 1361:35, 1361:38, 1361:44, 1362:43, 1363:27, 1363:45, 1372:20, 1386:8, 1394:8, 1424:19, 1438:16 Foods[1] - 1352:28 foot [1] - 1429:2 Foreign[9] - 1362:21, 1363:33, 1363:39, 1424:23, 1424:40, 1424:45, 1425:12, 1425:34, 1432:3 forfeit [1] - 1422:31 form [30] - 1349:33, 1351:22, 1351:27, 1356:25, 1356:26, 1356:27, 1358:21, 1359:3, 1363:10, 1363:20, 1363:32, 1363:38, 1365:43, 1366:42, 1367:1, 1367:6, 1370:30, 1375:30, 1381:4, 1387:34, 1389:46, 1400:36, 1405:24, 1411:15, 1414:40, 1414:41, 1424:13, 1424:24, 1424:39, 1425:11 formal [1] - 1406:21 formally [1] - 1357:30 forms [3] - 1351:23, 1365:12, 1365:14 fortunately [1] - 1442:22 fortune [1] - 1422:34 forward [2] - 1383:8, 1383:25 forwarded [3] - 1365:29, 1431:29, 1431:32 forwarder [2] - 1431:23, 1431:43 forwarding [1] - 1435:2 four [1] - 1348:32 framework [1] - 1435:19 frankly [3] - 1381:22, 1447:33, 1448:44</p>	<p>free [3] - 1355:16, 1371:5, 1374:5 freight [7] - 1370:45, 1371:7, 1371:14, 1431:23, 1431:43, 1433:2, 1435:2 freighted [1] - 1371:20 Friday[1] - 1344:34 friend [3] - 1345:9, 1349:11, 1349:31 friend' [1] - 1359:37 friends [2] - 1360:40, 1397:4 front [3] - 1374:2, 1374:3, 1395:43 fulfil [2] - 1368:35, 1444:4 fulfilled [4] - 1372:38, 1386:25, 1407:28, 1409:12 full [4] - 1347:28, 1422:24, 1435:31, 1435:35 fundamentally [1] - 1423:26 funds [4] - 1372:27, 1406:40, 1426:1, 1426:14 funny [1] - 1396:45 furnished [1] - 1426:20 future [1] - 1421:25 Fyi[1] - 1433:32</p>	<p>1402:2, 1402:11 given [8] - 1345:1, 1389:39, 1391:12, 1409:21, 1429:4, 1429:17, 1430:8, 1439:40 glitch [3] - 1432:20, 1432:21, 1433:39 glory [1] - 1429:29 gluten [1] - 1355:16 gluten-free [1] - 1355:16 Glyn[1] - 1350:35 Goods[1] - 1363:19 goods [13] - 1362:23, 1371:19, 1372:25, 1389:7, 1416:40, 1424:38, 1430:3, 1431:15, 1434:42, 1435:40, 1440:35, 1447:6, 1448:30 Government[7] - 1345:42, 1346:9, 1346:19, 1346:27, 1362:31, 1396:40, 1435:16 government [2] - 1415:29, 1429:4 Government's [1] - 1346:10 graduate [1] - 1359:37 granted [1] - 1362:20 great [2] - 1387:22, 1444:28 gross [2] - 1430:27, 1437:30 ground [1] - 1385:43 grow [1] - 1355:12 growing [2] - 1351:10, 1351:14 guarantee [14] - 1429:3, 1429:10, 1430:8, 1430:43, 1430:44, 1430:47, 1431:8, 1434:17, 1434:26, 1434:32, 1434:36, 1434:44, 1435:7, 1435:25 guaranteeing [2] - 1428:37, 1435:15 guarantees [1] - 1430:14 guess [3] - 1398:33, 1401:4, 1430:37 guy [2] - 1409:1</p>	<p>handsomely [1] - 1420:31 handwriting [5] - 1359:29, 1365:19, 1365:21, 1374:23, 1439:1 handwritten [3] - 1365:24, 1370:8, 1404:44 happily [1] - 1429:17 happy [3] - 1419:44, 1419:47, 1432:31 hard [2] - 1413:33, 1435:18 harder [1] - 1413:36 hardly [1] - 1413:29 Hbr[1] - 1382:9 head [3] - 1398:16, 1409:30, 1441:2 heading [1] - 1419:24 Health [17] - 1359:36, 1365:15, 1366:43, 1367:44, 1368:13, 1369:44, 1370:13, 1396:29, 1396:34, 1431:45, 1432:8, 1432:12, 1432:25, 1432:30, 1432:35, 1433:16, 1433:22 health [9] - 1360:41, 1360:45, 1361:15, 1380:41, 1380:46, 1397:5, 1397:11, 1397:23, 1397:28 hear [4] - 1346:47, 1347:12, 1419:32, 1429:25 heard [10] - 1355:31, 1364:45, 1380:47, 1401:19, 1429:17, 1430:12, 1430:13, 1447:32, 1448:46 hearing [2] - 1442:7, 1442:14 Hearing [1] - 1450:27 heart [1] - 1444:26 heel [2] - 1413:30, 1421:2 held [1] - 1372:27 Held[1] - 1344:30 hell [1] - 1432:18 Hellmann [3] - 1431:25, 1433:2, 1447:3 Hellmanns [2] - 1446:30, 1446:35 helped [1] - 1354:44 hence [1] - 1413:36 Hewish [1] - 1426:33 hide [2] - 1415:32, 1415:33 hierarchy [1] - 1396:36 high [7] - 1366:37, 1366:38, 1392:37, 1394:1, 1431:1, 1431:2, 1437:36 higher [30] - 1366:27,</p>
		G		
		<p>gain [1] - 1412:10 gained [1] - 1391:28 gap [1] - 1447:25 gas [2] - 1425:29, 1425:30 General[1] - 1359:36 general [18] - 1354:8, 1356:47, 1360:41, 1360:45, 1361:6, 1361:14, 1380:19, 1380:41, 1380:46, 1397:5, 1397:10, 1397:22, 1397:28, 1411:10, 1413:40, 1435:18, 1442:28 generalities [1] - 1358:24 Generally[1] - 1357:23 generally [5] - 1351:24, 1354:7, 1356:41, 1357:30, 1380:45 generals [1] - 1361:3 generated [1] - 1379:42 generic [1] - 1351:23 gentleman [2] - 1346:29, 1354:26 Geofman[13] - 1395:18, 1395:21, 1395:33, 1395:43, 1396:2, 1396:3, 1396:6, 1399:25, 1400:40, 1401:30, 1401:42,</p>		
		H		
		<p>Hak[1] - 1416:37 halfway [2] - 1437:4, 1445:23 Hallak[1] - 1431:19 hand [4] - 1374:27, 1375:7, 1375:16, 1376:15 handle [1] - 1353:34 hands [1] - 1413:17 handsome [1] - 1422:2</p>		

<p>1366:38, 1388:15, 1388:22, 1388:31, 1388:38, 1389:9, 1389:15, 1390:19, 1390:26, 1390:27, 1391:37, 1391:38, 1392:43, 1393:4, 1393:13, 1394:1, 1398:27, 1398:28, 1409:4, 1411:19, 1412:34, 1413:7, 1413:22, 1413:25, 1417:37, 1420:35, 1441:4, 1441:19, 1441:23</p> <p>highly [1] - 1450:6</p> <p>himself [3] - 1391:28, 1402:39, 1422:33</p> <p>hold [2] - 1425:19, 1425:38</p> <p>holding [1] - 1434:26</p> <p>Hon [1] - 1344:25</p> <p>honest [4] - 1355:10, 1377:5, 1396:38, 1441:25</p> <p>honestly [1] - 1382:38</p> <p>honour [4] - 1422:16, 1422:19, 1422:21, 1422:24</p> <p>Honour [1] - 1345:1</p> <p>hope [1] - 1403:28</p> <p>Hope [1] - 1434:19</p> <p>hotel [1] - 1408:6</p> <p>hotels [1] - 1380:21</p> <p>hours [1] - 1399:14</p> <p>huff [1] - 1361:6</p> <p>hunt [2] - 1413:30, 1421:2</p> <p>hydrobromide [1] - 1356:26</p> <p>Hyoscine [1] - 1351:22</p> <p>hyoscine [45] - 1345:26, 1346:4, 1351:18, 1351:25, 1351:27, 1352:16, 1352:21, 1352:46, 1353:12, 1353:35, 1353:46, 1354:14, 1354:36, 1355:31, 1356:16, 1356:23, 1356:25, 1356:36, 1360:46, 1363:7, 1370:4, 1378:28, 1379:1, 1379:10, 1379:12, 1379:16, 1379:21, 1382:15, 1388:10, 1392:8, 1392:30, 1392:39, 1393:2, 1395:19, 1395:25, 1395:34, 1406:32, 1407:14, 1425:25, 1439:22, 1440:45, 1448:30, 1448:34, 1448:35</p> <p>hyoscine-n-butylbromide [3] -</p>	<p>1345:26, 1346:4, 1382:15</p> <p>hyoscine-related [1] - 1395:25</p> <p>hypothesis [1] - 1401:34</p> <p style="text-align: center;">I</p> <p>idea [3] - 1391:12, 1412:46, 1448:42</p> <p>identified [2] - 1425:13, 1426:22</p> <p>identify [11] - 1348:28, 1348:45, 1362:2, 1365:19, 1370:1, 1374:47, 1381:35, 1418:1, 1424:37, 1424:38, 1445:23</p> <p>ignored [1] - 1368:37</p> <p>ii [1] - 1447:5</p> <p>lic [7] - 1345:30, 1346:22, 1435:29, 1445:24, 1446:15, 1446:22, 1446:37</p> <p>like [5] - 1383:2, 1383:9, 1383:31, 1383:35, 1418:38</p> <p>illicit [6] - 1381:4, 1381:14, 1381:15, 1381:16, 1398:4, 1398:10</p> <p>imagine [2] - 1403:17, 1403:18</p> <p>immediate [1] - 1377:3</p> <p>immediately [4] - 1362:28, 1365:30, 1406:40, 1411:4</p> <p>implicit [1] - 1387:38</p> <p>implied [1] - 1361:35</p> <p>implies [1] - 1368:25</p> <p>important [3] - 1401:24, 1414:24, 1414:28</p> <p>importing [1] - 1355:26</p> <p>impossible [3] - 1386:42, 1386:46, 1414:11</p> <p>impressed [1] - 1421:4</p> <p>impression [1] - 1385:27</p> <p>improbable [2] - 1419:41, 1450:6</p> <p>incentive [2] - 1413:21, 1413:35</p> <p>Incidentally [1] - 1379:31</p> <p>include [4] - 1353:38, 1355:44, 1371:24, 1436:23</p> <p>included [4] - 1361:14, 1363:7, 1398:23, 1444:47</p> <p>includes [2] - 1350:33, 1355:23</p> <p>including [10] - 1354:36, 1358:6, 1384:35, 1391:9, 1391:35, 1416:7, 1422:17, 1436:15, 1446:29</p> <p>inconsistent [1] - 1443:7</p>	<p>incorporate [1] - 1366:30</p> <p>incorporated [1] - 1351:40</p> <p>incorrect [1] - 1369:2</p> <p>increase [7] - 1364:43, 1381:30, 1404:6, 1406:20, 1411:13, 1413:35, 1420:20</p> <p>increased [2] - 1411:23, 1447:23</p> <p>incur [1] - 1381:29</p> <p>incurred [1] - 1382:21</p> <p>indeed [2] - 1405:24, 1430:42</p> <p>Indeed [3] - 1366:41, 1387:41, 1413:10</p> <p>independent [1] - 1349:17</p> <p>Independent [2] - 1345:21, 1444:35</p> <p>indicate [6] - 1347:3, 1347:19, 1349:40, 1389:13, 1394:17, 1419:12</p> <p>indicated [5] - 1356:36, 1391:25, 1392:44, 1429:47, 1435:38</p> <p>indifferent [1] - 1421:4</p> <p>industry [1] - 1422:14</p> <p>inference [1] - 1346:9</p> <p>inferred [1] - 1346:7</p> <p>inferring [3] - 1346:16, 1346:25, 1346:31</p> <p>influence [2] - 1361:19, 1361:21</p> <p>information [11] - 1345:31, 1345:39, 1391:13, 1429:21, 1429:31, 1429:42, 1446:26, 1446:30, 1446:33, 1449:22, 1450:3</p> <p>informed [2] - 1354:7, 1407:46</p> <p>infringe [1] - 1362:23</p> <p>initial [3] - 1361:39, 1364:45, 1397:3</p> <p>initials [1] - 1420:6</p> <p>inland [2] - 1371:1, 1371:16</p> <p>inquiries [1] - 1431:35</p> <p>Inquiry [5] - 1344:17, 1345:21, 1444:35, 1446:24, 1448:3</p> <p>inquiry [21] - 1346:35, 1347:39, 1349:18, 1349:29, 1350:28, 1358:2, 1391:33, 1409:7, 1409:29, 1429:21, 1429:31, 1429:42, 1435:20, 1446:31, 1448:6, 1448:7, 1448:16, 1448:21, 1449:13, 1449:27, 1449:38</p> <p>insisting [1] - 1394:45</p>	<p>inspection [1] - 1432:4</p> <p>inspector [1] - 1435:34</p> <p>instance [1] - 1424:22</p> <p>instances [1] - 1430:6</p> <p>Instr [1] - 1433:33</p> <p>instructed [1] - 1428:12</p> <p>instruction [1] - 1387:37</p> <p>insurance [2] - 1370:44, 1371:7</p> <p>intend [1] - 1385:27</p> <p>intended [1] - 1391:11</p> <p>intending [1] - 1385:28</p> <p>interest [2] - 1391:41, 1449:25</p> <p>interested [1] - 1441:28</p> <p>interesting [1] - 1399:15</p> <p>interests [1] - 1413:32</p> <p>International [11] - 1367:44, 1368:13, 1368:17, 1416:27, 1416:32, 1418:19, 1418:27, 1445:40, 1445:41, 1446:43, 1447:2</p> <p>international [4] - 1355:25, 1362:24, 1362:29, 1379:12</p> <p>internationally [1] - 1355:24</p> <p>interpretation [1] - 1387:21</p> <p>interpreted [1] - 1381:11</p> <p>invasion [1] - 1443:45</p> <p>investigator [4] - 1429:36, 1446:46, 1447:27, 1447:40</p> <p>investigator's [1] - 1446:37</p> <p>investigators [9] - 1349:17, 1349:24, 1442:12, 1444:35, 1445:4, 1445:24, 1446:10, 1446:22, 1446:33</p> <p>invoice [1] - 1419:46</p> <p>invoicing [1] - 1353:40</p> <p>involved [16] - 1351:14, 1352:39, 1354:9, 1355:18, 1372:41, 1373:28, 1373:34, 1386:28, 1398:47, 1401:38, 1408:11, 1413:41, 1424:22, 1446:18, 1447:3</p> <p>involvement [6] - 1350:22, 1353:6, 1354:4, 1355:32, 1358:38, 1358:41</p> <p>Iraq [65] - 1345:42, 1356:21, 1359:36, 1359:43, 1360:3, 1360:10, 1361:4, 1361:29, 1361:37, 1362:9, 1362:19, 1362:23, 1362:37, 1363:20, 1363:38,</p>	<p>1364:23, 1364:28, 1364:31, 1364:38, 1365:44, 1367:5, 1368:4, 1368:10, 1368:25, 1368:31, 1368:32, 1368:38, 1369:13, 1369:35, 1370:43, 1371:1, 1372:28, 1372:40, 1373:40, 1374:37, 1380:13, 1380:15, 1380:20, 1381:29, 1382:39, 1384:8, 1384:11, 1384:12, 1385:44, 1386:4, 1386:27, 1386:43, 1386:44, 1395:11, 1395:29, 1396:40, 1405:19, 1419:26, 1420:23, 1424:39, 1432:36, 1435:3, 1435:40, 1439:10, 1441:28, 1443:38, 1447:7, 1448:30, 1448:35</p> <p>Iraq's [1] - 1372:14</p> <p>Iraqi [32] - 1346:9, 1346:10, 1346:19, 1346:27, 1351:29, 1356:12, 1356:33, 1357:18, 1358:25, 1358:39, 1372:40, 1381:36, 1382:33, 1384:5, 1384:46, 1385:9, 1385:14, 1386:45, 1389:29, 1389:39, 1392:23, 1396:36, 1396:40, 1415:29, 1418:35, 1419:22, 1429:4, 1429:23, 1432:2, 1435:15, 1443:42, 1447:28</p> <p>Iraqis [11] - 1356:28, 1391:38, 1393:13, 1403:17, 1403:19, 1419:6, 1419:8, 1428:37, 1429:10, 1430:44, 1440:5</p> <p>issue [4] - 1346:35, 1371:32, 1426:7, 1427:15</p> <p>issued [1] - 1367:24</p> <p>issuing [1] - 1407:35</p> <p>item [1] - 1382:8</p> <p>items [1] - 1382:7</p> <p>itself [1] - 1437:37</p> <p>Ix [16] - 1360:36, 1361:26, 1379:44, 1421:29, 1421:31, 1421:37, 1421:41, 1422:6, 1422:29, 1426:1, 1438:15, 1439:41, 1441:9, 1441:24, 1444:43, 1445:31</p>
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--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

J	1428:14, 1433:15, 1433:26, 1433:44, 1434:15, 1435:2, 1438:19 jump [2] - 1380:32, 1403:19 justification [1] - 1398:28 justify [1] - 1405:18	1357:32, 1401:38, 1413:6, 1413:8, 1414:18, 1414:19, 1431:41, 1437:38, 1437:40 largely [4] - 1355:44, 1399:3, 1435:31, 1443:37 larger [2] - 1414:4, 1420:44 largesse [1] - 1430:38 Last [1] - 1350:8 last [7] - 1348:2, 1349:40, 1350:5, 1362:16, 1448:25, 1449:2 late [6] - 1349:10, 1352:17, 1352:41, 1354:25, 1354:28, 1444:34 latter [1] - 1430:8 launched [1] - 1360:16 Lc [3] - 1427:40, 1428:25, 1428:36 Lc0 [1] - 1429:2 leading [2] - 1364:21, 1378:41 leap [1] - 1403:17 learn [1] - 1363:26 learned [3] - 1345:9, 1349:11, 1349:31 learnt [1] - 1390:10 least [7] - 1349:14, 1352:39, 1354:25, 1387:24, 1400:19, 1424:33, 1427:9 leave [1] - 1345:1 leaving [1] - 1416:46 led [1] - 1391:24 left [4] - 1374:27, 1375:7, 1403:36, 1428:33 left-hand [2] - 1374:27, 1375:7 legibility [1] - 1359:30 legible [1] - 1442:23 length [4] - 1345:13, 1345:15, 1387:22, 1425:33 less [9] - 1366:39, 1403:41, 1403:45, 1405:15, 1405:34, 1405:38, 1414:6, 1437:21, 1447:9 lesser [2] - 1401:21, 1437:38 Letter [1] - 1426:41 letter [58] - 1359:5, 1364:47, 1365:35, 1365:38, 1366:1, 1367:31, 1368:47, 1375:21, 1375:30, 1375:40, 1378:5, 1384:3, 1386:38, 1387:5, 1389:27, 1390:31, 1392:6, 1393:36, 1393:40,	1394:13, 1394:32, 1394:38, 1395:4, 1402:43, 1404:10, 1405:23, 1405:29, 1406:21, 1406:25, 1406:28, 1406:41, 1407:21, 1408:18, 1408:30, 1408:31, 1409:38, 1410:20, 1410:25, 1411:32, 1414:13, 1414:40, 1414:45, 1421:22, 1422:28, 1423:1, 1423:3, 1423:4, 1423:12, 1423:33, 1427:8, 1427:40, 1428:12, 1432:1, 1436:4, 1436:14, 1436:40, 1447:1 letterhead [2] - 1405:3, 1405:7 Level [1] - 1344:30 level [7] - 1358:27, 1366:34, 1368:32, 1387:18, 1390:13, 1394:1, 1399:19 levels [1] - 1413:34 levied [1] - 1345:33 levying [1] - 1346:11 Libby [1] - 1439:5 life [1] - 1410:15 lifted [1] - 1425:38 light [1] - 1415:27 likelihood [7] - 1379:41, 1385:32, 1386:11, 1391:17, 1412:3, 1412:4, 1435:14 likely [12] - 1366:39, 1385:38, 1385:41, 1386:13, 1392:19, 1399:17, 1406:12, 1409:17, 1411:38, 1412:23, 1412:34, 1435:17 Likewise [2] - 1358:18, 1438:31 Limited [23] - 1345:13, 1345:22, 1345:25, 1345:36, 1346:2, 1346:29, 1346:33, 1347:14, 1349:30, 1350:14, 1350:23, 1350:27, 1351:6, 1351:35, 1351:45, 1352:8, 1352:28, 1352:31, 1352:35, 1352:43, 1367:46, 1368:3, 1368:22 line [6] - 1384:7, 1394:21, 1394:22, 1417:22, 1439:45, 1448:42 lines [3] - 1362:17, 1375:47, 1381:27 linked [1] - 1396:28 list [5] - 1360:21,	1362:44, 1362:46, 1363:1, 1363:4 listed [1] - 1392:31 listen [1] - 1412:33 Listen [1] - 1412:18 loading [1] - 1371:10 local [5] - 1356:42, 1356:43, 1357:1, 1433:1 locate [2] - 1365:9, 1423:30 located [1] - 1359:5 lodge [1] - 1384:46 lodging [1] - 1400:19 logical [2] - 1411:30, 1412:41 Look [2] - 1365:38, 1403:36 look [9] - 1373:42, 1386:7, 1387:20, 1408:47, 1435:18, 1441:11, 1447:47, 1448:1, 1448:2 looked [1] - 1372:24 looking [2] - 1400:12, 1441:12 loss [5] - 1403:23, 1421:42, 1422:5, 1422:34, 1422:35 lost [6] - 1421:6, 1421:37, 1421:41, 1422:10, 1422:28 lower [6] - 1378:13, 1378:18, 1389:27, 1390:32, 1392:44, 1437:41 lowest [1] - 1371:47 luck [1] - 1359:28 lunch [1] - 1410:31 Luncheon [1] - 1410:38 luncheon [1] - 1411:4
	<div style="text-align: center;">K</div> keen [1] - 1413:33 keep [4] - 1357:46, 1358:6, 1378:22, 1390:10 Kenneth [2] - 1347:24, 1347:29 kept [4] - 1349:19, 1354:7, 1432:20, 1444:12 Kerry [3] - 1375:42, 1382:36, 1383:39 key [1] - 1430:26 kg [1] - 1442:27 kilo [22] - 1377:29, 1378:14, 1379:36, 1388:44, 1388:46, 1389:28, 1392:19, 1392:35, 1407:29, 1412:20, 1412:24, 1420:18, 1421:46, 1421:47, 1429:5, 1430:44, 1440:28, 1440:29, 1440:46, 1443:9, 1443:12, 1443:17 kilogram [9] - 1378:22, 1382:4, 1382:8, 1382:9, 1388:12, 1388:34, 1403:12, 1412:8, 1415:40 kilograms [5] - 1346:4, 1382:14, 1388:10, 1439:22, 1440:45 kilos [2] - 1406:32, 1407:14 Kingaroy [3] - 1351:2, 1351:7, 1405:12 knowing [2] - 1368:33, 1412:28 knowingly [2] - 1356:13, 1356:15 knowledge [11] - 1346:36, 1351:28, 1352:45, 1357:2, 1357:5, 1357:9, 1361:31, 1362:14, 1398:11, 1398:30, 1411:36 known [5] - 1351:24, 1351:25, 1407:47, 1412:31, 1412:38	<div style="text-align: center;">L</div> large [10] - 1346:31,		
				<div style="text-align: center;">M</div> M1,2,3/13/03 [1] - 1440:15 magnitude [4] - 1390:8, 1391:45, 1414:1, 1414:7 mail [1] - 1447:1 maintaining [2] - 1358:5, 1403:26 major [2] - 1355:28, 1398:25 makers [1] - 1361:11 Maltings [3] - 1352:31, 1352:35, 1352:43 man [2] - 1368:17, 1400:31 managed [5] - 1390:14, 1391:37, 1393:11, 1393:12, 1421:2 Manager [1] - 1367:45 manager [5] - 1368:22, 1369:1, 1369:7, 1373:18, 1397:21

<p>managing [2] - 1352:8, 1397:24</p> <p>manner [2] - 1399:34, 1399:35</p> <p>manoeuvring [1] - 1402:39</p> <p>manufacturer [1] - 1370:24</p> <p>Manufacturing [5] - 1346:2, 1381:41, 1382:25, 1396:24, 1418:3</p> <p>March [1] - 1443:46</p> <p>margin [3] - 1381:31, 1390:14, 1392:36</p> <p>mark [1] - 1349:22</p> <p>marked [1] - 1350:6</p> <p>Market [1] - 1344:31</p> <p>market [35] - 1352:20, 1352:46, 1353:11, 1354:8, 1355:36, 1356:12, 1356:33, 1356:36, 1357:6, 1357:7, 1357:28, 1366:30, 1378:27, 1378:34, 1378:41, 1378:42, 1378:47, 1379:4, 1379:5, 1379:7, 1379:10, 1379:12, 1379:20, 1379:26, 1392:8, 1392:11, 1392:20, 1392:25, 1392:30, 1393:2, 1393:5, 1403:5, 1414:8, 1440:34</p> <p>marketed [1] - 1352:2</p> <p>marketing [14] - 1352:25, 1353:34, 1353:46, 1354:5, 1354:19, 1354:22, 1354:35, 1354:36, 1355:18, 1355:23, 1355:32, 1355:41, 1368:1, 1405:6</p> <p>markets [2] - 1355:44, 1356:37</p> <p>marry [1] - 1434:30</p> <p>mathematically [1] - 1420:46</p> <p>mathematics [5] - 1376:35, 1379:35, 1388:37, 1391:46, 1392:2</p> <p>maths [3] - 1376:38, 1377:17, 1377:19</p> <p>Matt [6] - 1405:15, 1407:43, 1408:4, 1408:12, 1408:46, 1409:1</p> <p>matter [15] - 1349:33, 1357:41, 1386:41, 1388:25, 1391:41, 1396:47, 1407:36, 1414:22, 1417:7, 1419:13, 1420:10, 1424:31, 1428:22,</p>	<p>1433:30, 1448:46</p> <p>matters [14] - 1351:41, 1354:5, 1356:30, 1357:39, 1358:13, 1375:35, 1376:10, 1399:39, 1406:13, 1419:43, 1426:14, 1426:30, 1428:44, 1429:41</p> <p>Matthew [3] - 1346:46, 1347:7, 1354:26</p> <p>maximise [1] - 1379:22</p> <p>mean [8] - 1396:36, 1401:3, 1401:4, 1401:5, 1402:9, 1432:23, 1435:1, 1435:18</p> <p>meaning [3] - 1381:11, 1397:24, 1435:28</p> <p>means [8] - 1361:37, 1366:38, 1366:39, 1376:32, 1376:40, 1377:6, 1398:46, 1413:35</p> <p>meant [6] - 1360:30, 1377:2, 1384:41, 1401:15, 1432:15, 1435:1</p> <p>media [1] - 1442:10</p> <p>Medical [3] - 1346:3, 1381:42, 1382:26</p> <p>Medicines [1] - 1392:23</p> <p>meet [2] - 1399:18, 1405:46</p> <p>Megaw [2] - 1375:42, 1382:36</p> <p>Megaw's [2] - 1383:39, 1387:46</p> <p>member [1] - 1353:10</p> <p>members [3] - 1351:1, 1354:3, 1442:10</p> <p>memory [12] - 1368:16, 1369:16, 1373:29, 1373:42, 1374:6, 1376:33, 1383:1, 1410:11, 1414:33, 1432:32, 1441:31, 1441:34</p> <p>mention [2] - 1345:22, 1429:3</p> <p>mentioned [5] - 1364:34, 1364:41, 1380:22, 1391:30, 1411:26</p> <p>merchant [8] - 1347:36, 1350:12, 1355:1, 1355:10, 1357:45, 1390:13, 1391:42, 1422:13</p> <p>merchants [1] - 1406:1</p> <p>met [1] - 1439:22</p> <p>method [2] - 1360:9, 1370:28</p> <p>mid [2] - 1425:43, 1444:19</p> <p>mid-90s [1] - 1352:42</p> <p>Middle [7] - 1356:2, 1356:7, 1363:39,</p>	<p>1397:20, 1398:24, 1398:26, 1398:32</p> <p>middle [3] - 1419:42, 1442:23, 1443:38</p> <p>might [3] - 1365:47, 1406:5, 1411:31</p> <p>mind [11] - 1360:13, 1373:32, 1377:8, 1381:2, 1381:17, 1398:2, 1398:46, 1403:11, 1447:16, 1447:21, 1447:24</p> <p>Mine [1] - 1377:19</p> <p>mine [5] - 1359:30, 1376:36, 1378:1, 1378:8, 1401:24</p> <p>minimal [1] - 1371:38</p> <p>Minister [1] - 1362:21</p> <p>ministries [1] - 1429:23</p> <p>ministry [1] - 1442:29</p> <p>Ministry [14] - 1365:15, 1366:43, 1369:44, 1370:13, 1396:28, 1396:33, 1431:45, 1432:8, 1432:12, 1432:24, 1432:30, 1432:35, 1433:16, 1433:22</p> <p>minor [1] - 1369:39</p> <p>minus [1] - 1437:19</p> <p>misled [1] - 1364:14</p> <p>misrepresent [1] - 1387:15</p> <p>misrepresentation [1] - 1387:8</p> <p>missing [2] - 1415:6, 1415:7</p> <p>mission [2] - 1425:3, 1425:20</p> <p>misunderstanding [1] - 1423:29</p> <p>modest [3] - 1423:10, 1423:47, 1424:4</p> <p>Moh [1] - 1434:1</p> <p>moment [26] - 1346:41, 1349:20, 1357:18, 1357:19, 1360:12, 1364:11, 1374:12, 1377:24, 1377:39, 1378:6, 1388:28, 1389:20, 1389:45, 1390:37, 1390:38, 1393:25, 1396:22, 1410:29, 1410:32, 1414:15, 1423:29, 1426:21, 1428:14, 1435:23, 1441:47, 1448:23</p> <p>Monday [2] - 1450:25, 1450:28</p> <p>money [25] - 1346:26, 1393:18, 1397:9, 1397:15, 1397:32, 1397:45, 1398:3, 1398:15, 1399:24, 1401:43, 1402:4,</p>	<p>1402:13, 1413:42, 1413:43, 1415:19, 1423:15, 1423:17, 1423:18, 1423:34, 1428:17, 1437:43, 1439:47, 1447:37</p> <p>month [2] - 1354:23, 1440:18</p> <p>monthly [1] - 1354:18</p> <p>months [3] - 1399:32, 1441:12, 1441:15</p> <p>morning [9] - 1345:8, 1345:15, 1345:46, 1347:3, 1348:46, 1349:11, 1399:40, 1401:19, 1407:20</p> <p>Most [1] - 1355:25</p> <p>most [4] - 1367:7, 1385:40, 1392:19, 1404:3</p> <p>motivation [1] - 1405:42</p> <p>move [4] - 1423:39, 1424:12, 1437:45, 1442:20</p> <p>movement [1] - 1431:40</p> <p>movements [1] - 1410:18</p> <p>Moving [1] - 1415:35</p> <p>multi [1] - 1367:1</p> <p>multi-page [1] - 1367:1</p> <p>multiple [1] - 1362:1</p> <p>must [11] - 1359:17, 1362:19, 1362:22, 1368:15, 1380:7, 1391:12, 1391:15, 1397:35, 1407:33, 1432:22, 1444:22</p>	<p>neat [1] - 1357:33</p> <p>necessarily [1] - 1412:43</p> <p>necessary [8] - 1357:2, 1366:31, 1367:13, 1380:12, 1384:27, 1422:40, 1433:47, 1435:47</p> <p>Need [1] - 1426:39</p> <p>need [20] - 1345:2, 1349:13, 1357:26, 1367:30, 1374:32, 1375:10, 1378:44, 1381:3, 1393:27, 1394:18, 1396:37, 1410:11, 1412:43, 1414:32, 1416:13, 1417:25, 1417:32, 1426:14, 1432:7, 1432:12</p> <p>needed [2] - 1362:31, 1369:20</p> <p>needs [5] - 1376:20, 1376:26, 1380:3, 1425:16, 1443:44</p> <p>negotiate [7] - 1368:32, 1369:13, 1369:18, 1369:21, 1369:25, 1413:22, 1413:25</p> <p>negotiated [1] - 1428:12</p> <p>negotiating [2] - 1405:6, 1406:1</p> <p>negotiation [2] - 1353:39</p> <p>negotiations [8] - 1368:2, 1376:19, 1380:38, 1387:38, 1399:45, 1404:36, 1445:38, 1446:31</p> <p>nerve [2] - 1425:29, 1425:30</p> <p>Net [1] - 1370:29</p> <p>net [6] - 1382:20, 1420:37, 1420:38, 1437:18, 1439:43, 1439:45</p> <p>never [39] - 1351:33, 1380:44, 1389:43, 1390:2, 1390:20, 1391:10, 1391:29, 1391:47, 1392:2, 1393:11, 1397:25, 1398:9, 1398:12, 1399:18, 1399:19, 1415:30, 1420:24, 1420:37, 1420:38, 1427:20, 1427:30, 1429:17, 1430:12, 1430:13, 1432:21, 1441:33, 1441:34, 1441:43, 1444:7, 1444:8, 1446:26, 1448:10, 1448:38, 1448:46</p> <p>Never [1] - 1389:35</p> <p>New [2] - 1351:40, 1425:4</p> <p>newfound [1] - 1409:27</p> <p>newspaper [3] - 1435:31,</p>
N				
			<p>Name [1] - 1370:24</p> <p>name [16] - 1347:1, 1347:28, 1351:22, 1351:23, 1352:28, 1354:26, 1375:17, 1396:28, 1400:41, 1406:11, 1416:37, 1426:33, 1429:38, 1436:20, 1446:17, 1446:19</p> <p>named [1] - 1346:29</p> <p>namely [1] - 1437:36</p> <p>names [7] - 1349:18, 1349:24, 1351:24, 1396:7, 1396:16, 1396:45, 1442:11</p> <p>Nations [13] - 1345:21, 1349:24, 1363:27, 1363:32, 1372:20, 1372:26, 1372:28, 1372:30, 1425:21, 1425:34, 1426:6, 1442:12</p> <p>nature [2] - 1357:28, 1380:33</p> <p>nearly [2] - 1376:47, 1441:15</p>	

<p>1435:33, 1449:7 next [23] - 1361:25, 1362:34, 1363:15, 1363:36, 1372:32, 1373:39, 1374:39, 1376:20, 1376:24, 1377:11, 1405:28, 1411:14, 1417:22, 1419:11, 1419:15, 1419:29, 1419:34, 1420:5, 1420:9, 1421:20, 1428:26, 1433:25, 1433:43 nice [1] - 1355:5 no-one [2] - 1368:38, 1428:40 nominated [1] - 1436:18 non [2] - 1395:19, 1395:34 non-hyoscine [2] - 1395:19, 1395:34 None [1] - 1356:34 nonetheless [1] - 1390:32 normal [2] - 1357:42, 1405:13 normally [1] - 1422:45 Norman [4] - 1347:11, 1347:16, 1350:35, 1350:38 notation [8] - 1379:32, 1379:42, 1380:1, 1380:2, 1383:8, 1383:25, 1404:44, 1428:25 notations [2] - 1370:8, 1376:18 note [49] - 1359:20, 1360:12, 1360:38, 1365:27, 1374:17, 1374:23, 1374:36, 1374:47, 1375:15, 1376:14, 1376:31, 1376:43, 1376:47, 1378:14, 1379:33, 1379:37, 1379:38, 1382:45, 1383:15, 1394:11, 1395:10, 1395:15, 1398:39, 1399:22, 1400:12, 1400:28, 1408:43, 1409:33, 1414:37, 1415:43, 1415:44, 1416:11, 1416:44, 1417:30, 1418:16, 1419:5, 1426:18, 1426:20, 1428:21, 1428:24, 1430:19, 1434:31, 1436:36, 1438:46, 1438:47, 1439:11, 1442:22, 1443:3, 1443:22 noted [3] - 1345:34, 1410:14, 1428:44 notes [7] - 1345:41, 1376:46, 1377:1,</p>	<p>1378:9, 1394:14, 1444:23 Nothing [1] - 1450:22 nothing [15] - 1351:40, 1385:24, 1391:14, 1393:37, 1408:18, 1409:45, 1411:33, 1412:9, 1414:5, 1415:28, 1419:25, 1422:29, 1432:19, 1440:6, 1444:28 notice [3] - 1381:23, 1405:20, 1431:38 Notification [1] - 1363:19 notification [4] - 1424:24, 1424:38, 1425:18, 1447:2 notified [1] - 1416:22 November [1] - 1425:39 number [24] - 1348:19, 1348:32, 1349:3, 1350:17, 1351:23, 1359:17, 1359:27, 1362:8, 1362:38, 1364:9, 1368:18, 1375:9, 1375:18, 1384:28, 1392:3, 1400:3, 1414:19, 1419:15, 1419:16, 1419:17, 1426:29, 1429:23, 1446:25 Numbered [2] - 1371:45, 1372:12 numbered [2] - 1370:20, 1370:35 numbers [5] - 1375:9, 1405:8, 1423:6, 1430:26 numerals [1] - 1380:2 Nut [1] - 1352:7 nut [2] - 1355:26, 1355:29 nuts [2] - 1355:3, 1355:19 nutshell [2] - 1350:24, 1407:26</p>	<p>1380:7, 1384:28, 1407:36, 1411:45, 1430:38 Obviously [1] - 1389:46 occasion [8] - 1353:15, 1356:23, 1361:2, 1366:25, 1395:3, 1395:32, 1397:27, 1418:31 occasioned [2] - 1425:47, 1426:1 occasions [2] - 1361:3, 1401:4 occupation [2] - 1347:35, 1350:12 occur [6] - 1352:16, 1381:8, 1381:14, 1391:32, 1392:40, 1411:45 occurred [15] - 1350:45, 1358:42, 1364:45, 1374:14, 1379:45, 1383:13, 1392:3, 1400:14, 1407:33, 1412:3, 1424:13, 1436:8, 1439:41, 1443:38, 1443:46 October [20] - 1358:42, 1359:14, 1359:31, 1361:43, 1364:3, 1364:4, 1364:15, 1364:16, 1364:27, 1364:46, 1365:2, 1365:6, 1366:12, 1367:30, 1397:3, 1397:29, 1439:4, 1439:6, 1440:27, 1449:2 odd [1] - 1444:27 offer [30] - 1378:18, 1388:10, 1388:23, 1388:39, 1388:44, 1389:7, 1389:9, 1390:20, 1390:40, 1391:18, 1392:11, 1392:28, 1394:5, 1394:7, 1394:32, 1400:23, 1400:38, 1402:44, 1403:12, 1403:13, 1403:14, 1404:17, 1412:7, 1412:8, 1420:36, 1422:32, 1430:28, 1440:28, 1442:19 Offer [1] - 1370:23 offered [4] - 1390:33, 1391:25, 1403:4, 1403:27 offering [2] - 1391:20, 1440:34 offers [1] - 1421:25 office [4] - 1382:26, 1383:21, 1407:43, 1431:42 officer [2] - 1351:33, 1369:14</p>	<p>Officer [1] - 1363:38 officers [2] - 1346:37, 1349:17 official [1] - 1400:36 often [1] - 1364:38 Oil [21] - 1344:18, 1345:37, 1346:12, 1351:29, 1359:47, 1360:3, 1360:29, 1360:47, 1361:20, 1361:33, 1361:35, 1361:38, 1361:44, 1362:43, 1363:27, 1363:45, 1372:20, 1386:8, 1394:8, 1424:19, 1438:16 Oil-for-food [21] - 1344:18, 1345:37, 1346:12, 1351:29, 1359:47, 1360:3, 1360:29, 1360:47, 1361:20, 1361:33, 1361:35, 1361:38, 1361:44, 1362:43, 1363:27, 1363:45, 1372:20, 1386:8, 1394:8, 1424:19, 1438:16 old [1] - 1390:13 Olga [1] - 1350:41 on-sending [1] - 1383:15 once [3] - 1373:39, 1437:9, 1448:17 one [45] - 1345:25, 1347:13, 1347:42, 1347:43, 1348:1, 1348:2, 1356:16, 1356:31, 1357:7, 1363:15, 1365:42, 1368:17, 1368:38, 1369:30, 1375:42, 1376:4, 1380:45, 1382:14, 1388:37, 1392:6, 1397:27, 1401:38, 1404:42, 1405:24, 1416:39, 1421:31, 1421:32, 1426:18, 1426:21, 1426:26, 1426:45, 1427:23, 1428:40, 1429:32, 1433:9, 1434:41, 1434:43, 1438:9, 1441:47, 1442:18, 1442:20, 1442:22, 1445:25, 1446:25 One [5] - 1380:40, 1403:17, 1422:13, 1423:8, 1443:21 one-man [1] - 1368:17 ones [2] - 1443:25, 1446:34 open [2] - 1418:30, 1418:32 opened [1] - 1345:12 Opening [2] - 1428:29,</p>	<p>1428:31 opening [5] - 1345:11, 1345:15, 1345:18, 1345:46, 1428:36 operated [1] - 1368:13 operation [1] - 1397:21 opining [1] - 1408:25 opportunity [3] - 1414:6, 1422:34, 1422:37 opposed [1] - 1369:14 oral [3] - 1347:20, 1407:19, 1409:22 order [4] - 1372:1, 1396:16, 1432:14, 1442:11 orders [1] - 1445:12 ordinarily [1] - 1366:27 ordinary [1] - 1371:28 organisation [1] - 1415:8 Origin [1] - 1370:24 original [10] - 1347:5, 1380:40, 1394:18, 1394:38, 1394:39, 1395:4, 1395:5, 1416:13, 1430:28, 1437:35 originally [3] - 1389:15, 1403:27, 1437:35 otherwise [3] - 1384:21, 1400:36, 1401:31 Ottawa [1] - 1359:37 ought [1] - 1349:18 ourselves [2] - 1400:43, 1435:32 outcome [1] - 1400:38 Outliner [1] - 1362:36 outlined [1] - 1441:31 outside [3] - 1371:28, 1372:40, 1386:27 overall [1] - 1424:8 overprice [33] - 1389:16, 1389:17, 1389:18, 1390:11, 1391:29, 1391:44, 1393:38, 1409:34, 1411:7, 1411:14, 1411:47, 1412:9, 1412:13, 1412:17, 1412:19, 1412:29, 1412:36, 1414:3, 1415:14, 1420:30, 1420:41, 1420:45, 1421:23, 1421:42, 1422:11, 1422:18, 1422:31, 1422:38, 1423:2, 1423:23, 1430:29, 1436:29, 1440:7 overprice-type [1] - 1440:7 overprices [2] - 1411:27, 1413:41 overpricing [2] - 1393:25, 1410:9 overseas [13] - 1356:45, 1357:21, 1357:37, 1357:47, 1358:15,</p>
O				
	<p>o'clock [1] - 1410:36 oath [1] - 1429:17 objection [1] - 1396:12 obligations [2] - 1362:24, 1362:30 observation [1] - 1415:45 observed [3] - 1362:26, 1377:14, 1420:13 obtained [5] - 1362:3, 1365:23, 1370:2, 1434:11, 1443:31 obtaining [2] - 1361:28, 1400:37 obvious [2] - 1391:31, 1435:2 obviously [6] - 1376:35,</p>			

<p>1358:20, 1358:26, 1358:31, 1364:31, 1366:28, 1404:34, 1416:7, 1437:9</p> <p>own [4] - 1376:33, 1395:45, 1401:2, 1413:35</p> <p>owned [2] - 1396:39, 1396:44</p>	<p>1409:7, 1409:8, 1416:27, 1421:36, 1422:28, 1447:15</p> <p>paragraphs [2] - 1371:45, 1385:24</p> <p>parameters [1] - 1392:38</p> <p>pardon [1] - 1350:25</p> <p>Pardon [1] - 1449:44</p> <p>part [10] - 1354:39, 1361:8, 1364:41, 1372:19, 1383:1, 1385:22, 1393:41, 1410:10, 1414:25, 1414:28</p> <p>particular [39] - 1351:34, 1356:1, 1357:6, 1357:26, 1358:14, 1359:21, 1364:24, 1366:25, 1368:10, 1370:7, 1371:19, 1372:9, 1372:17, 1373:3, 1373:12, 1373:27, 1374:18, 1379:43, 1382:26, 1383:25, 1389:22, 1395:3, 1397:21, 1397:26, 1398:7, 1404:40, 1405:21, 1413:42, 1418:18, 1419:13, 1426:7, 1427:1, 1428:19, 1431:9, 1437:47, 1440:23, 1442:19, 1444:42, 1447:25</p> <p>particularly [25] - 1359:29, 1360:7, 1360:30, 1361:38, 1372:29, 1378:16, 1378:19, 1378:25, 1380:6, 1380:8, 1380:36, 1386:42, 1388:20, 1397:34, 1397:39, 1403:4, 1414:24, 1414:28, 1428:23, 1428:46, 1429:28, 1435:30, 1444:24, 1446:11, 1449:23</p> <p>parties [2] - 1427:3, 1446:32</p> <p>partly [2] - 1373:23, 1438:44</p> <p>parts [2] - 1380:43, 1414:20</p> <p>party [3] - 1372:40, 1386:27, 1447:3</p> <p>passage [1] - 1442:22</p> <p>past [2] - 1406:47, 1410:19</p> <p>path [1] - 1436:22</p> <p>pattern [2] - 1441:8, 1441:17</p> <p>Pausing [1] - 1383:42</p> <p>pay [55] - 1358:27, 1358:31, 1366:16, 1366:27, 1380:12,</p>	<p>1380:29, 1390:32, 1391:19, 1391:24, 1392:24, 1395:39, 1397:9, 1397:15, 1397:32, 1397:45, 1398:3, 1398:15, 1398:27, 1399:24, 1399:25, 1399:27, 1401:35, 1401:42, 1402:4, 1402:12, 1402:13, 1403:37, 1403:40, 1404:4, 1404:24, 1405:30, 1405:34, 1406:19, 1407:22, 1408:26, 1411:27, 1415:13, 1415:19, 1419:6, 1419:9, 1423:5, 1423:17, 1427:45, 1428:17, 1429:5, 1429:10, 1429:32, 1429:33, 1430:38, 1430:39, 1430:44, 1431:26, 1447:4</p> <p>payable [3] - 1405:38, 1413:16, 1427:10</p> <p>paying [14] - 1377:16, 1380:20, 1393:38, 1395:45, 1400:34, 1401:1, 1401:43, 1402:4, 1402:18, 1402:19, 1405:21, 1412:29, 1412:47, 1423:15</p> <p>payment [22] - 1346:31, 1346:32, 1358:19, 1372:24, 1381:4, 1381:11, 1393:18, 1394:46, 1398:5, 1399:26, 1400:36, 1401:8, 1401:10, 1417:32, 1428:1, 1434:33, 1435:15, 1436:4, 1436:15, 1436:17, 1446:23, 1447:18</p> <p>Payment [2] - 1370:28, 1372:14</p> <p>payments [22] - 1345:36, 1346:37, 1357:28, 1357:38, 1381:13, 1381:15, 1381:16, 1398:8, 1398:10, 1398:12, 1398:24, 1398:29, 1398:32, 1400:17, 1400:32, 1401:45, 1415:19, 1444:42, 1444:47, 1446:16</p> <p>peanuts [1] - 1352:3</p> <p>people [18] - 1361:5, 1361:22, 1380:3, 1380:13, 1380:17, 1380:18, 1380:21, 1380:22, 1380:28, 1380:35, 1380:39, 1380:42, 1380:43,</p>	<p>1381:4, 1381:13, 1398:8, 1431:25, 1440:34</p> <p>per [130] - 1346:7, 1346:11, 1354:14, 1354:23, 1358:28, 1358:32, 1358:35, 1359:16, 1366:2, 1366:25, 1375:26, 1376:26, 1376:38, 1377:15, 1377:21, 1377:24, 1377:29, 1377:43, 1378:14, 1378:22, 1379:28, 1379:36, 1380:3, 1380:13, 1380:25, 1380:29, 1382:4, 1388:12, 1388:34, 1388:38, 1388:44, 1388:45, 1388:46, 1389:9, 1389:28, 1390:19, 1390:27, 1390:32, 1391:19, 1391:25, 1391:37, 1392:1, 1392:19, 1392:24, 1392:43, 1393:1, 1393:8, 1393:30, 1393:44, 1403:2, 1403:12, 1403:27, 1403:29, 1403:32, 1404:4, 1404:17, 1404:19, 1404:24, 1405:30, 1405:41, 1406:7, 1406:19, 1406:20, 1406:38, 1407:8, 1407:29, 1408:15, 1408:19, 1408:27, 1409:3, 1410:19, 1411:13, 1411:33, 1412:8, 1412:14, 1412:20, 1412:24, 1415:40, 1417:32, 1417:37, 1419:38, 1420:18, 1420:35, 1421:46, 1421:47, 1422:41, 1422:44, 1429:5, 1429:32, 1430:1, 1430:28, 1430:44, 1430:47, 1431:2, 1431:26, 1431:35, 1432:23, 1432:32, 1432:34, 1433:13, 1433:33, 1436:26, 1437:18, 1437:25, 1437:37, 1440:6, 1440:7, 1440:28, 1440:29, 1440:46, 1441:4, 1441:19, 1441:39, 1443:9, 1443:12, 1443:13, 1443:17, 1443:18, 1447:18, 1447:21, 1447:23, 1447:34, 1447:41, 1447:44, 1448:11, 1448:15, 1448:39,</p>	<p>1449:17</p> <p>percentage [4] - 1380:12, 1380:25, 1405:25, 1410:18</p> <p>per [1] - 1415:9</p> <p>perform [1] - 1443:43</p> <p>perhaps [18] - 1349:14, 1358:8, 1369:42, 1373:33, 1373:34, 1375:40, 1379:31, 1379:32, 1384:26, 1391:31, 1401:15, 1404:16, 1417:5, 1420:9, 1425:47, 1427:33, 1445:11, 1447:41</p> <p>Perhaps [2] - 1347:45, 1359:26</p> <p>period [11] - 1346:12, 1354:25, 1356:5, 1364:34, 1408:3, 1408:7, 1408:36, 1408:37, 1411:22, 1411:38, 1444:24</p> <p>periods [2] - 1377:4, 1449:19</p> <p>permission [3] - 1362:20, 1431:45, 1433:21</p> <p>person [1] - 1360:45</p> <p>personally [5] - 1351:44, 1381:19, 1408:36, 1408:37, 1424:30</p> <p>perusal [1] - 1399:43</p> <p>pharmaceutical [7] - 1351:18, 1356:44, 1364:22, 1367:5, 1367:9, 1369:43, 1432:13</p> <p>phase [34] - 1360:19, 1360:20, 1360:35, 1360:36, 1361:25, 1361:26, 1361:27, 1379:44, 1394:8, 1421:29, 1421:31, 1421:37, 1421:41, 1422:6, 1422:29, 1426:1, 1438:15, 1438:19, 1438:23, 1438:27, 1438:31, 1438:34, 1439:20, 1439:41, 1440:11, 1440:12, 1440:15, 1440:23, 1441:9, 1441:24, 1443:30, 1444:43, 1445:31</p> <p>phases [1] - 1360:28</p> <p>phone [3] - 1359:17, 1407:47, 1444:27</p> <p>photocopy [1] - 1347:4</p> <p>piece [5] - 1414:16, 1414:21, 1414:26, 1423:21, 1432:37</p> <p>pieces [1] - 1400:3</p> <p>pikestaff [1] - 1402:17</p> <p>Pioneer [2] - 1350:14,</p>
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<p>1353:16 Pistachio [2] - 1350:14, 1353:16 pitch [4] - 1359:42, 1361:8, 1361:9, 1392:11 place [4] - 1351:5, 1385:34, 1407:44, 1444:20 plain [1] - 1402:17 plainly [2] - 1419:20, 1423:46 plan [3] - 1362:42, 1362:47, 1363:1 planned [1] - 1427:1 plant [2] - 1351:10, 1351:13 pleased [2] - 1420:23, 1434:44 plus [9] - 1376:16, 1376:25, 1376:29, 1377:24, 1415:40, 1418:47, 1419:9, 1422:18, 1443:12 pocket [2] - 1395:45, 1401:2 Point [1] - 1347:32 point [9] - 1346:13, 1363:10, 1363:16, 1363:36, 1384:5, 1387:39, 1414:16, 1418:4, 1437:39 points [1] - 1362:38 Police [1] - 1356:19 policy [3] - 1345:43, 1346:11, 1413:38 port [2] - 1371:11, 1371:12 portion [2] - 1427:9, 1436:26 position [6] - 1347:21, 1350:13, 1356:40, 1369:12, 1407:7, 1443:43 positive [1] - 1417:16 possibilities [5] - 1389:25, 1389:26, 1390:36, 1391:17, 1391:30 possibility [9] - 1385:28, 1390:24, 1390:28, 1390:29, 1398:7, 1398:9, 1414:9, 1415:14, 1415:15 possible [18] - 1345:16, 1357:5, 1382:33, 1385:36, 1385:39, 1386:13, 1386:44, 1390:34, 1392:38, 1396:6, 1400:9, 1401:45, 1411:26, 1411:27, 1415:11, 1430:46, 1437:46, 1438:14 possibly [1] - 1387:2 post [2] - 1382:26,</p>	<p>1432:31 Post [1] - 1394:38 post-volcker [1] - 1432:31 potentially [2] - 1359:43, 1416:39 potentially [2] - 1412:28, 1412:35 Potentially [1] - 1413:6 Potts [1] - 1347:32 practice [4] - 1358:5, 1389:18, 1413:41, 1422:45 practices [1] - 1415:45 precise [3] - 1408:44, 1411:25, 1424:3 precisely [1] - 1435:3 prejudices [1] - 1398:33 preliminary [1] - 1391:46 preparation [1] - 1375:4 prepare [2] - 1381:34, 1432:27 prepared [24] - 1369:37, 1374:17, 1381:36, 1384:28, 1384:34, 1385:6, 1387:15, 1387:43, 1387:47, 1390:32, 1391:6, 1391:19, 1391:24, 1392:45, 1396:23, 1396:32, 1401:7, 1403:23, 1404:39, 1408:32, 1409:6, 1409:23, 1438:9 preparing [2] - 1381:45, 1389:39 present [6] - 1350:18, 1377:18, 1378:38, 1387:33, 1400:35, 1444:15 presented [2] - 1415:6, 1439:43 press [1] - 1445:13 pressing [1] - 1378:13 presumably [3] - 1384:41, 1400:34, 1419:14 pretty [2] - 1353:44, 1413:45 previously [2] - 1434:31, 1442:11 price [126] - 1346:5, 1346:17, 1366:38, 1376:20, 1376:24, 1377:25, 1377:34, 1377:40, 1378:4, 1378:13, 1378:22, 1378:27, 1378:28, 1378:35, 1378:41, 1378:42, 1378:47, 1379:4, 1379:5, 1379:8, 1379:12, 1379:13, 1379:18, 1379:20, 1379:25, 1379:27, 1379:35, 1379:43, 1380:25, 1382:3,</p>	<p>1382:20, 1388:11, 1388:16, 1388:23, 1388:31, 1388:34, 1388:38, 1388:45, 1389:7, 1389:9, 1389:10, 1389:13, 1389:14, 1389:27, 1389:47, 1390:5, 1390:19, 1390:26, 1390:33, 1391:15, 1391:20, 1391:36, 1391:38, 1392:8, 1392:11, 1392:18, 1392:20, 1392:25, 1392:30, 1392:32, 1392:38, 1392:39, 1392:44, 1393:2, 1393:13, 1393:33, 1403:3, 1404:6, 1406:2, 1406:31, 1407:29, 1408:9, 1409:4, 1409:14, 1410:12, 1411:24, 1412:20, 1413:7, 1413:22, 1413:25, 1413:33, 1415:39, 1416:23, 1417:36, 1418:13, 1418:46, 1418:47, 1419:9, 1419:30, 1419:35, 1420:14, 1420:18, 1420:20, 1420:28, 1420:32, 1420:35, 1421:16, 1430:27, 1430:29, 1437:21, 1437:41, 1439:22, 1439:34, 1439:43, 1439:44, 1439:45, 1439:46, 1440:1, 1440:3, 1440:4, 1440:27, 1440:45, 1441:4, 1441:18, 1441:19, 1441:23, 1441:29, 1441:30, 1441:40, 1442:44, 1443:8, 1448:15, 1448:42 Prices [1] - 1370:38 prices [9] - 1354:8, 1370:29, 1371:24, 1372:1, 1376:23, 1378:18, 1392:35, 1403:6, 1414:32 pricing [1] - 1366:31 primary [1] - 1346:35 principal [5] - 1351:5, 1369:26, 1373:4, 1396:2, 1427:41 principal's [1] - 1400:41 principals [1] - 1406:2 principle [3] - 1411:27, 1414:6, 1414:31 private [2] - 1396:37, 1396:40 probable [4] - 1385:40, 1386:13, 1386:14, 1398:6</p>	<p>problem [4] - 1366:37, 1427:27, 1433:17, 1443:36 problems [1] - 1427:28 procedure [1] - 1437:33 proceed [1] - 1434:4 proceeded [1] - 1416:16 proceeds [16] - 1422:1, 1424:8, 1426:46, 1426:47, 1427:7, 1427:8, 1427:9, 1427:30, 1427:42, 1428:10, 1428:13, 1428:16, 1428:19, 1428:24, 1436:14, 1436:40 Proceeds [1] - 1426:40 process [5] - 1362:37, 1367:8, 1380:43, 1424:14, 1424:18 processed [2] - 1351:17, 1395:29 processes [1] - 1367:10 processing [3] - 1351:15, 1352:15, 1395:28 prods [1] - 1414:34 produce [4] - 1386:11, 1414:21, 1414:26, 1447:7 produced [4] - 1349:29, 1352:3, 1353:35, 1432:2 produces [1] - 1351:17 producing [1] - 1352:16 product [31] - 1351:18, 1351:27, 1351:28, 1352:21, 1353:12, 1353:35, 1353:38, 1353:41, 1353:46, 1354:6, 1354:15, 1354:36, 1355:32, 1355:36, 1355:41, 1355:44, 1356:17, 1356:24, 1356:32, 1356:34, 1356:37, 1360:46, 1367:47, 1370:4, 1379:1, 1392:33, 1392:36, 1395:25, 1395:29, 1425:25 products [13] - 1355:4, 1355:19, 1355:23, 1355:27, 1356:12, 1362:44, 1362:46, 1363:1, 1363:4, 1367:5, 1369:44, 1395:19, 1395:34 Products [2] - 1367:44, 1368:13 program [6] - 1361:25, 1362:14, 1362:45, 1426:2, 1438:20, 1440:23 Program [19] - 1345:37, 1346:12, 1351:29,</p>	<p>1359:47, 1360:4, 1360:29, 1360:47, 1361:20, 1361:33, 1361:35, 1361:44, 1362:43, 1363:28, 1363:45, 1372:21, 1386:8, 1394:8, 1424:19, 1438:16 Programme [1] - 1344:18 projected [1] - 1345:42 projector [1] - 1359:26 promotion [1] - 1353:38 prompt [1] - 1362:13 prompted [1] - 1449:37 promulgated [1] - 1398:26 proposal [1] - 1448:29 proposals [1] - 1448:43 propose [1] - 1345:14 proposed [5] - 1347:19, 1347:22, 1370:3, 1420:21, 1439:21 proposition [1] - 1368:41 prospect [1] - 1401:14 protests [1] - 1444:25 protocols [3] - 1361:36, 1361:38, 1362:9 provide [17] - 1346:16, 1346:25, 1346:30, 1347:45, 1348:4, 1388:4, 1389:8, 1389:29, 1391:18, 1404:23, 1416:14, 1419:44, 1419:47, 1425:12, 1445:30, 1446:24, 1446:30 provided [11] - 1346:43, 1349:11, 1349:31, 1374:13, 1386:36, 1387:24, 1389:28, 1394:47, 1430:7, 1431:9, 1446:26 providing [1] - 1424:23 provision [1] - 1418:21 prudent [2] - 1412:41, 1413:29 Pty [23] - 1345:13, 1345:22, 1345:25, 1345:35, 1346:1, 1346:29, 1346:33, 1347:14, 1349:30, 1350:14, 1350:23, 1350:26, 1351:6, 1351:34, 1351:45, 1352:8, 1352:28, 1352:31, 1352:35, 1352:43, 1367:46, 1368:3, 1368:22 pub [1] - 1399:17 public [2] - 1396:3, 1396:4 Public [1] - 1397:24 published [3] - 1349:25, 1442:12, 1445:15 puff [1] - 1361:6 pun [1] - 1350:25</p>
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<p>purporting [1] - 1365:1</p> <p>purposes [6] - 1347:39, 1350:18, 1373:26, 1377:18, 1378:38, 1396:32</p> <p>pursuant [2] - 1346:10, 1349:23</p> <p>pursue [1] - 1392:40</p> <p>put [43] - 1359:24, 1370:13, 1373:19, 1375:29, 1376:10, 1378:5, 1379:44, 1380:7, 1380:24, 1384:26, 1387:5, 1387:18, 1387:20, 1388:9, 1388:15, 1388:22, 1390:39, 1409:26, 1411:19, 1411:30, 1411:38, 1411:40, 1412:7, 1412:20, 1412:27, 1412:34, 1412:38, 1412:42, 1413:15, 1415:36, 1416:23, 1425:19, 1425:25, 1429:41, 1431:13, 1437:9, 1438:13, 1438:19, 1438:23, 1439:21, 1439:33, 1441:40, 1445:19</p> <p>puts [1] - 1380:12</p> <p>putting [9] - 1360:20, 1379:6, 1379:18, 1379:25, 1392:6, 1404:38, 1414:13, 1439:4, 1444:12</p> <p>Putting [3] - 1356:10, 1356:30, 1357:18</p>	<p>1440:5</p> <p>quoted [4] - 1370:38, 1382:20, 1440:4, 1440:28</p> <p>quoting [1] - 1399:37</p>	<p>1391:19, 1398:25, 1401:18, 1449:40</p> <p>reasonable [6] - 1373:22, 1396:46, 1413:34, 1421:12, 1421:13, 1421:18</p> <p>reasonably [1] - 1364:29</p> <p>Reasonably[1] - 1421:12</p> <p>reasons [1] - 1427:24</p> <p>recap [1] - 1396:22</p> <p>receipt [3] - 1406:40, 1427:1, 1447:8</p> <p>receive [6] - 1354:18, 1369:41, 1425:17, 1447:1, 1449:43, 1449:46</p> <p>received [12] - 1366:33, 1407:28, 1409:13, 1420:43, 1425:42, 1426:19, 1429:21, 1429:31, 1429:42, 1431:19, 1435:47, 1449:38</p> <p>recent [2] - 1399:31, 1399:37</p> <p>recently [1] - 1449:34</p> <p>recognise [1] - 1441:13</p> <p>recognised [1] - 1378:47</p> <p>recollect [38] - 1361:27, 1362:9, 1362:46, 1362:47, 1369:19, 1372:10, 1378:16, 1378:24, 1378:25, 1378:44, 1380:30, 1380:37, 1381:19, 1381:20, 1397:39, 1397:43, 1397:47, 1406:23, 1407:20, 1408:2, 1408:45, 1411:20, 1412:25, 1417:45, 1424:30, 1425:11, 1429:37, 1430:12, 1431:37, 1441:29, 1441:30, 1441:38, 1441:41, 1441:44, 1449:18, 1449:20</p> <p>recollection [23] - 1362:13, 1366:8, 1374:34, 1377:10, 1378:12, 1378:30, 1378:42, 1379:33, 1379:38, 1384:30, 1384:32, 1385:13, 1409:21, 1409:27, 1409:28, 1411:11, 1411:22, 1417:43, 1429:43, 1431:5, 1431:6, 1431:8, 1443:33</p> <p>recommended [1] - 1416:40</p> <p>recommending [1] - 1362:41</p> <p>recommends [1] - 1363:10</p>	<p>reconfirm [1] - 1433:30</p> <p>reconstruct [3] - 1376:43, 1378:8, 1384:18</p> <p>reconstructing [1] - 1408:40</p> <p>record [9] - 1358:6, 1358:13, 1359:30, 1410:15, 1414:35, 1415:25, 1416:6, 1418:20, 1439:5</p> <p>recording [2] - 1399:22, 1439:19</p> <p>records [9] - 1357:46, 1364:3, 1378:14, 1378:45, 1382:42, 1414:16, 1415:8, 1439:11, 1440:10</p> <p>recreate [2] - 1376:32, 1377:1</p> <p>reduce [1] - 1358:19</p> <p>reduced [2] - 1353:23, 1353:30</p> <p>refer [11] - 1359:46, 1365:41, 1368:47, 1374:7, 1380:39, 1382:35, 1400:4, 1402:35, 1402:43, 1409:20, 1441:17</p> <p>referable [2] - 1427:9, 1435:14</p> <p>reference [34] - 1345:24, 1356:15, 1356:16, 1359:35, 1365:13, 1366:1, 1372:4, 1372:17, 1383:2, 1383:39, 1384:41, 1405:18, 1406:32, 1409:8, 1414:31, 1416:26, 1416:32, 1416:37, 1416:43, 1418:19, 1418:25, 1418:30, 1418:38, 1419:11, 1426:22, 1426:37, 1427:45, 1436:36, 1437:3, 1439:20, 1442:35, 1443:22, 1445:45, 1447:42</p> <p>references [2] - 1360:28, 1375:11</p> <p>referred [31] - 1345:17, 1345:27, 1345:40, 1346:21, 1346:38, 1347:2, 1349:43, 1356:31, 1364:42, 1366:9, 1379:37, 1380:42, 1382:13, 1382:19, 1383:14, 1384:3, 1386:31, 1387:43, 1390:6, 1393:24, 1393:39, 1406:33, 1407:19, 1409:32, 1414:14, 1422:12, 1422:38, 1423:1, 1423:46,</p>	<p>1435:7, 1449:32</p> <p>referring [11] - 1356:18, 1357:11, 1357:13, 1381:3, 1397:10, 1397:27, 1397:41, 1398:39, 1409:39, 1423:31, 1447:18</p> <p>refers [11] - 1345:32, 1349:16, 1360:19, 1365:6, 1365:12, 1366:25, 1369:1, 1401:17, 1409:45, 1423:22, 1443:28</p> <p>refresh [6] - 1373:42, 1374:5, 1379:32, 1379:37, 1417:43, 1429:42</p> <p>refreshes [1] - 1383:1</p> <p>regard [1] - 1445:12</p> <p>regarded [4] - 1381:21, 1381:30, 1387:1, 1414:5</p> <p>regarding [1] - 1400:17</p> <p>Regarding[1] - 1406:19</p> <p>regardless [1] - 1422:14</p> <p>register [1] - 1430:15</p> <p>registering [1] - 1365:14</p> <p>registration [13] - 1364:22, 1365:14, 1366:42, 1367:6, 1367:8, 1367:10, 1367:14, 1367:20, 1367:22, 1368:1, 1373:40, 1396:33, 1432:13</p> <p>regular [1] - 1379:10</p> <p>regulations [1] - 1372:36</p> <p>reimburse [1] - 1415:19</p> <p>relate [9] - 1375:4, 1376:18, 1376:19, 1379:46, 1400:22, 1400:35, 1419:14, 1419:42, 1447:20</p> <p>related [9] - 1355:4, 1355:19, 1376:10, 1377:11, 1379:42, 1395:25, 1411:12, 1435:32, 1446:25</p> <p>relates [6] - 1376:23, 1394:32, 1400:42, 1400:45, 1419:20, 1421:25</p> <p>relating [7] - 1345:40, 1346:44, 1375:36, 1419:45, 1426:30, 1439:5, 1449:8</p> <p>relation [45] - 1348:46, 1353:41, 1353:45, 1354:5, 1354:35, 1355:31, 1356:41, 1357:37, 1358:14, 1359:13, 1361:19, 1361:32, 1364:27, 1367:47, 1372:9, 1377:9, 1390:5, 1394:46, 1395:34,</p>
<p>Q</p> <p>Qc[1] - 1344:25</p> <p>quantity [1] - 1372:2</p> <p>quarter [1] - 1424:8</p> <p>Queensland [1] - 1351:2</p> <p>query [2] - 1366:33, 1380:28</p> <p>querying [2] - 1381:19, 1381:20</p> <p>questioning [2] - 1349:27, 1349:33</p> <p>questions [11] - 1411:5, 1412:27, 1412:45, 1442:18, 1444:39, 1445:8, 1446:13, 1446:25, 1446:35, 1450:11, 1450:13</p> <p>quickly [4] - 1360:8, 1400:8, 1417:47, 1424:36</p> <p>quite [10] - 1377:5, 1409:30, 1414:29, 1419:44, 1419:47, 1429:16, 1437:38, 1441:33, 1447:33, 1447:34</p> <p>quote [2] - 1439:43,</p>	<p>R</p> <p>Rafadin[2] - 1428:33, 1428:40</p> <p>Rafidain[6] - 1429:15, 1429:18, 1429:22, 1429:34, 1430:43, 1434:32</p> <p>raft [1] - 1432:5</p> <p>raised [4] - 1360:7, 1393:11, 1427:25, 1447:42</p> <p>ran [1] - 1352:46</p> <p>rang [3] - 1383:41, 1432:9, 1449:41</p> <p>ranges [1] - 1392:38</p> <p>rare [1] - 1358:31</p> <p>rate [3] - 1366:27, 1378:39, 1379:34</p> <p>rates [2] - 1346:20, 1421:15</p> <p>rather [6] - 1356:44, 1357:11, 1395:8, 1409:18, 1430:8, 1443:7</p> <p>rcvd [1] - 1434:17</p> <p>reaction [1] - 1434:43</p> <p>read [28] - 1349:12, 1349:13, 1357:31, 1380:36, 1380:37, 1394:19, 1396:17, 1396:22, 1399:41, 1428:36, 1429:2, 1429:7, 1429:16, 1429:28, 1432:9, 1432:23, 1432:30, 1434:47, 1435:28, 1435:30, 1435:31, 1435:32, 1435:33, 1435:35, 1435:36, 1443:23, 1447:15</p> <p>reading [4] - 1362:10, 1377:4, 1430:11, 1442:43</p> <p>reads [3] - 1372:34, 1394:22, 1420:5</p> <p>reality [1] - 1368:17</p> <p>really [16] - 1360:16, 1368:41, 1379:39, 1383:22, 1391:43, 1396:39, 1396:41, 1409:1, 1413:15, 1429:12, 1432:14, 1441:29, 1441:31, 1444:4, 1444:14, 1447:29</p> <p>realms [1] - 1414:9</p> <p>reason [9] - 1349:16, 1349:42, 1378:31, 1383:18, 1390:25,</p>	<p>1391:19, 1398:25, 1401:18, 1449:40</p> <p>reasonable [6] - 1373:22, 1396:46, 1413:34, 1421:12, 1421:13, 1421:18</p> <p>reasonably [1] - 1364:29</p> <p>Reasonably[1] - 1421:12</p> <p>reasons [1] - 1427:24</p> <p>recap [1] - 1396:22</p> <p>receipt [3] - 1406:40, 1427:1, 1447:8</p> <p>receive [6] - 1354:18, 1369:41, 1425:17, 1447:1, 1449:43, 1449:46</p> <p>received [12] - 1366:33, 1407:28, 1409:13, 1420:43, 1425:42, 1426:19, 1429:21, 1429:31, 1429:42, 1431:19, 1435:47, 1449:38</p> <p>recent [2] - 1399:31, 1399:37</p> <p>recently [1] - 1449:34</p> <p>recognise [1] - 1441:13</p> <p>recognised [1] - 1378:47</p> <p>recollect [38] - 1361:27, 1362:9, 1362:46, 1362:47, 1369:19, 1372:10, 1378:16, 1378:24, 1378:25, 1378:44, 1380:30, 1380:37, 1381:19, 1381:20, 1397:39, 1397:43, 1397:47, 1406:23, 1407:20, 1408:2, 1408:45, 1411:20, 1412:25, 1417:45, 1424:30, 1425:11, 1429:37, 1430:12, 1431:37, 1441:29, 1441:30, 1441:38, 1441:41, 1441:44, 1449:18, 1449:20</p> <p>recollection [23] - 1362:13, 1366:8, 1374:34, 1377:10, 1378:12, 1378:30, 1378:42, 1379:33, 1379:38, 1384:30, 1384:32, 1385:13, 1409:21, 1409:27, 1409:28, 1411:11, 1411:22, 1417:43, 1429:43, 1431:5, 1431:6, 1431:8, 1443:33</p> <p>recommended [1] - 1416:40</p> <p>recommending [1] - 1362:41</p> <p>recommends [1] - 1363:10</p>	<p>1435:7, 1449:32</p> <p>referring [11] - 1356:18, 1357:11, 1357:13, 1381:3, 1397:10, 1397:27, 1397:41, 1398:39, 1409:39, 1423:31, 1447:18</p> <p>refers [11] - 1345:32, 1349:16, 1360:19, 1365:6, 1365:12, 1366:25, 1369:1, 1401:17, 1409:45, 1423:22, 1443:28</p> <p>refresh [6] - 1373:42, 1374:5, 1379:32, 1379:37, 1417:43, 1429:42</p> <p>refreshes [1] - 1383:1</p> <p>regard [1] - 1445:12</p> <p>regarded [4] - 1381:21, 1381:30, 1387:1, 1414:5</p> <p>regarding [1] - 1400:17</p> <p>Regarding[1] - 1406:19</p> <p>regardless [1] - 1422:14</p> <p>register [1] - 1430:15</p> <p>registering [1] - 1365:14</p> <p>registration [13] - 1364:22, 1365:14, 1366:42, 1367:6, 1367:8, 1367:10, 1367:14, 1367:20, 1367:22, 1368:1, 1373:40, 1396:33, 1432:13</p> <p>regular [1] - 1379:10</p> <p>regulations [1] - 1372:36</p> <p>reimburse [1] - 1415:19</p> <p>relate [9] - 1375:4, 1376:18, 1376:19, 1379:46, 1400:22, 1400:35, 1419:14, 1419:42, 1447:20</p> <p>related [9] - 1355:4, 1355:19, 1376:10, 1377:11, 1379:42, 1395:25, 1411:12, 1435:32, 1446:25</p> <p>relates [6] - 1376:23, 1394:32, 1400:42, 1400:45, 1419:20, 1421:25</p> <p>relating [7] - 1345:40, 1346:44, 1375:36, 1419:45, 1426:30, 1439:5, 1449:8</p> <p>relation [45] - 1348:46, 1353:41, 1353:45, 1354:5, 1354:35, 1355:31, 1356:41, 1357:37, 1358:14, 1359:13, 1361:19, 1361:32, 1364:27, 1367:47, 1372:9, 1377:9, 1390:5, 1394:46, 1395:34,</p>	

<p>1396:16, 1399:46, 1402:32, 1404:34, 1410:17, 1412:36, 1415:4, 1417:6, 1424:14, 1427:6, 1427:15, 1428:44, 1430:19, 1430:24, 1430:44, 1433:13, 1436:24, 1438:27, 1438:31, 1438:34, 1441:9, 1441:23, 1442:19, 1443:21, 1443:30, 1444:43</p> <p>Relation^[1] - 1344:17</p> <p>relations ^[1] - 1439:10</p> <p>relationship ^[8] - 1352:11, 1353:28, 1357:14, 1368:29, 1369:29, 1387:16, 1396:35, 1446:27</p> <p>relationships ^[1] - 1446:28</p> <p>relative ^[1] - 1357:6</p> <p>relatively ^[7] - 1357:7, 1357:29, 1369:39, 1405:41, 1410:9, 1410:17, 1410:22</p> <p>release ^[2] - 1446:30, 1446:32</p> <p>releasing ^[1] - 1434:37</p> <p>relevant ^[6] - 1350:45, 1399:4, 1418:32, 1438:42, 1443:42, 1445:31</p> <p>relevantly ^[2] - 1351:40, 1352:30</p> <p>relied ^[2] - 1385:33, 1386:11</p> <p>relief ^[1] - 1434:43</p> <p>reluctant ^[2] - 1404:3, 1404:23</p> <p>reluctantly ^[2] - 1405:29, 1408:26</p> <p>Reluctantly ^[1] - 1405:33</p> <p>remain ^[3] - 1357:27, 1396:7, 1396:8</p> <p>remark ^[2] - 1357:42, 1421:14</p> <p>remarkable ^[1] - 1441:39</p> <p>remarkably ^[1] - 1441:8</p> <p>remarked ^[1] - 1358:8</p> <p>remarks ^[2] - 1396:3, 1396:6</p> <p>remember ^[25] - 1360:7, 1361:39, 1366:36, 1377:6, 1378:19, 1378:21, 1380:6, 1380:9, 1380:36, 1384:15, 1385:16, 1385:18, 1390:12, 1397:17, 1397:34, 1401:17, 1423:41, 1427:24, 1427:29, 1429:14, 1430:33, 1430:35, 1443:45, 1444:24</p> <p>remembered ^[2] - 1414:29, 1414:33</p> <p>remind ^[2] - 1345:16, 1442:9</p> <p>reminded ^[1] - 1349:14</p> <p>reminders ^[1] - 1445:13</p> <p>renegotiate ^[1] - 1422:41</p> <p>renegotiating ^[1] - 1422:44</p> <p>repeat ^[1] - 1345:14</p> <p>repeats ^[2] - 1345:30, 1345:39</p> <p>replace ^[1] - 1347:5</p> <p>reply ^[5] - 1433:9, 1434:15, 1446:37, 1446:39, 1446:40</p> <p>report ^[7] - 1345:20, 1345:23, 1345:24, 1345:30, 1346:22, 1433:5, 1435:29</p> <p>Report^[2] - 1429:47, 1449:8</p> <p>reports ^[1] - 1435:31</p> <p>representation ^[1] - 1369:6</p> <p>represented ^[1] - 1385:47</p> <p>represents ^[3] - 1358:9, 1368:21, 1436:25</p> <p>Request^[1] - 1363:19</p> <p>request ^[4] - 1391:10, 1405:23, 1424:38, 1446:21</p> <p>requested ^[6] - 1367:30, 1375:29, 1391:6, 1406:21, 1406:46, 1408:19</p> <p>requesting ^[6] - 1366:1, 1403:32, 1414:41, 1429:10, 1447:4, 1449:38</p> <p>require ^[1] - 1401:10</p> <p>required ^[11] - 1362:37, 1368:31, 1369:17, 1373:21, 1401:42, 1430:2, 1431:47, 1433:22, 1434:10, 1447:18</p> <p>requirement ^[11] - 1366:21, 1367:4, 1367:7, 1371:40, 1373:3, 1373:27, 1375:10, 1375:35, 1376:9, 1434:32</p> <p>requirements ^[11] - 1361:32, 1369:43, 1370:3, 1372:2, 1381:46, 1382:19, 1386:8, 1386:21, 1386:31, 1387:42, 1391:3</p> <p>requires ^[2] - 1366:30, 1399:25</p> <p>requiring ^[6] - 1371:24, 1395:4, 1401:35, 1402:3, 1402:11,</p>	<p>1429:10</p> <p>research ^[3] - 1361:44, 1379:5, 1379:9</p> <p>reside ^[1] - 1347:32</p> <p>residents ^[1] - 1351:1</p> <p>resolution ^[1] - 1372:15</p> <p>Resolution^[1] - 1372:18</p> <p>resolved ^[1] - 1426:10</p> <p>respect ^[7] - 1368:10, 1368:31, 1380:41, 1381:28, 1387:32, 1403:5, 1411:31</p> <p>responded ^[1] - 1404:18</p> <p>responsibility ^[1] - 1434:6</p> <p>responsible ^[2] - 1367:46, 1434:37</p> <p>rest ^[3] - 1390:1, 1439:38, 1440:1</p> <p>result ^[10] - 1359:4, 1403:3, 1407:8, 1413:34, 1422:6, 1425:20, 1425:47, 1426:14, 1427:29, 1428:10</p> <p>Resumption^[1] - 1411:2</p> <p>retain ^[1] - 1356:41</p> <p>retained ^[2] - 1346:28, 1349:17</p> <p>retainer ^[2] - 1353:23, 1354:13</p> <p>retainers ^[1] - 1357:22</p> <p>retaining ^[1] - 1353:39</p> <p>return ^[5] - 1403:41, 1405:34, 1413:34, 1420:44, 1449:23</p> <p>Return^[1] - 1363:38</p> <p>returned ^[1] - 1442:14</p> <p>returns ^[3] - 1379:22, 1405:42, 1437:4</p> <p>revive ^[1] - 1353:7</p> <p>rewarded ^[1] - 1420:31</p> <p>Rfd^[1] - 1344:25</p> <p>right-hand ^[2] - 1375:16, 1376:15</p> <p>ring ^[1] - 1447:43</p> <p>ringing ^[1] - 1398:16</p> <p>risk ^[2] - 1371:38, 1434:45</p> <p>Robert^[1] - 1350:28</p> <p>room ^[4] - 1403:29, 1404:18, 1442:7, 1442:14</p> <p>roughly ^[1] - 1400:26</p> <p>round ^[2] - 1408:22, 1408:24</p> <p>rung ^[1] - 1359:18</p> <p>running ^[2] - 1399:13, 1409:29</p> <p>rush ^[1] - 1433:30</p>	<p>safety ^[1] - 1433:32</p> <p>sale ^[10] - 1345:26, 1355:18, 1356:18, 1370:4, 1389:14, 1407:14, 1422:1, 1424:8, 1427:42, 1437:21</p> <p>sales ^[20] - 1352:26, 1353:34, 1353:39, 1353:41, 1353:46, 1354:5, 1354:14, 1354:35, 1354:36, 1355:25, 1355:32, 1356:41, 1359:42, 1360:3, 1360:9, 1361:8, 1361:9, 1362:44, 1368:1, 1413:33</p> <p>salesman ^[2] - 1355:2, 1361:6</p> <p>Samara^[13] - 1370:30, 1370:38, 1370:45, 1371:1, 1371:25, 1382:21, 1382:22, 1382:27, 1416:41, 1431:40, 1433:6, 1434:4, 1434:42</p> <p>sat ^[1] - 1432:27</p> <p>satisfaction ^[2] - 1373:23, 1414:22</p> <p>satisfied ^[3] - 1362:22, 1406:24, 1421:9</p> <p>satisfy ^[2] - 1368:12, 1370:13</p> <p>saw ^[8] - 1372:46, 1376:31, 1430:35, 1431:42, 1432:7, 1432:28, 1432:29, 1434:41</p> <p>Sc^[1] - 1372:15</p> <p>Scmdma ^[1] - 1385:7</p> <p>Scopolamine ^[1] - 1382:9</p> <p>screen ^[10] - 1359:25, 1360:14, 1369:47, 1380:37, 1382:37, 1384:27, 1394:16, 1402:34, 1445:20, 1445:21</p> <p>screens ^[1] - 1445:14</p> <p>Sdi^[2] - 1371:47, 1372:4</p> <p>search ^[1] - 1358:1</p> <p>Second ^[1] - 1348:38</p> <p>second ^[17] - 1347:10, 1363:10, 1372:33, 1375:47, 1382:13, 1383:21, 1384:7, 1386:22, 1386:38, 1390:27, 1402:43, 1409:26, 1416:27, 1421:36, 1422:28, 1445:21, 1445:22</p> <p>Secondly ^[1] - 1446:46</p> <p>secondly ^[1] - 1348:27</p> <p>secretary ^[1] - 1383:29</p> <p>Section ^[1] - 1363:39</p> <p>secure ^[2] - 1381:4, 1415:20</p>	<p>Security ^[1] - 1372:18</p> <p>see ^[86] - 1351:17, 1356:23, 1359:9, 1359:27, 1359:38, 1360:12, 1360:19, 1360:24, 1360:33, 1360:38, 1362:16, 1362:36, 1362:37, 1362:38, 1363:4, 1363:12, 1363:22, 1363:36, 1364:26, 1365:18, 1365:35, 1366:5, 1368:6, 1368:24, 1370:8, 1370:20, 1370:32, 1370:36, 1370:45, 1372:34, 1372:43, 1374:8, 1374:41, 1374:45, 1375:7, 1375:16, 1375:41, 1375:47, 1376:15, 1377:23, 1380:14, 1381:42, 1382:20, 1382:47, 1383:1, 1383:9, 1383:33, 1384:10, 1384:42, 1399:4, 1399:22, 1404:15, 1407:38, 1408:14, 1409:26, 1409:32, 1410:17, 1411:30, 1413:45, 1414:13, 1416:14, 1416:26, 1416:33, 1416:36, 1417:2, 1417:27, 1418:3, 1418:8, 1418:43, 1421:28, 1422:5, 1422:34, 1422:37, 1423:30, 1427:22, 1427:33, 1428:41, 1430:20, 1430:21, 1432:31, 1432:43, 1434:36, 1437:3, 1440:44, 1441:12, 1442:37</p> <p>seeing ^[3] - 1362:7, 1364:9, 1430:34</p> <p>seek ^[3] - 1345:2, 1362:29, 1430:18</p> <p>seem ^[10] - 1374:32, 1384:17, 1385:12, 1386:30, 1403:11, 1406:46, 1418:20, 1419:41, 1442:35, 1449:46</p> <p>sell ^[8] - 1352:20, 1352:46, 1353:11, 1367:8, 1388:10, 1389:7, 1448:29, 1448:34</p> <p>Seller^[2] - 1372:39, 1386:26</p> <p>sellers ^[1] - 1392:33</p> <p>selling ^[4] - 1355:23, 1356:32, 1356:44, 1367:4</p>
S			
	<p>Saboure^[3] - 1395:46, 1396:1, 1396:6</p> <p>sadly ^[1] - 1425:46</p>		

<p>send [8] - 1382:38, 1385:19, 1385:29, 1395:4, 1407:4, 1418:41, 1425:2, 1425:3</p> <p>sending [5] - 1363:32, 1383:15, 1385:30, 1423:36, 1444:25</p> <p>senior [4] - 1345:11, 1345:12, 1345:14, 1345:17</p> <p>sense [3] - 1355:3, 1357:27, 1378:7</p> <p>sensible [1] - 1413:29</p> <p>sent [30] - 1365:1, 1365:43, 1373:40, 1375:41, 1376:11, 1382:36, 1383:14, 1384:4, 1384:21, 1384:40, 1384:45, 1385:13, 1385:16, 1385:17, 1385:22, 1385:25, 1385:33, 1387:28, 1400:26, 1400:39, 1406:28, 1418:31, 1434:18, 1435:39, 1445:24, 1446:4, 1449:6, 1449:11, 1449:20, 1449:21</p> <p>sentence [2] - 1422:24, 1431:44</p> <p>September [1] - 1426:29</p> <p>sequence [3] - 1432:44, 1433:26, 1433:43</p> <p>sequencing [1] - 1407:37</p> <p>serious [1] - 1448:45</p> <p>Service [1] - 1397:24</p> <p>service [13] - 1345:32, 1345:34, 1345:41, 1346:11, 1429:33, 1430:1, 1430:13, 1447:5, 1447:9, 1447:10, 1447:31, 1447:41</p> <p>services [2] - 1352:26, 1364:33</p> <p>set [2] - 1369:42, 1370:2</p> <p>sets [3] - 1384:7, 1384:8, 1389:27</p> <p>setting [3] - 1353:28, 1370:43, 1430:42</p> <p>seven [1] - 1349:2</p> <p>seven-page [1] - 1349:2</p> <p>several [2] - 1366:10, 1423:25</p> <p>Shall [1] - 1434:19</p> <p>Shimmon [1] - 1384:41</p> <p>Shimoon [220] - 1346:30, 1346:32, 1358:47, 1359:4, 1359:5, 1359:9, 1359:13, 1359:31, 1359:38, 1359:41, 1359:46, 1360:15, 1360:40, 1361:42, 1364:3, 1364:4,</p>	<p>1364:15, 1364:26, 1364:30, 1365:1, 1366:2, 1366:9, 1366:15, 1366:21, 1366:34, 1367:30, 1367:38, 1367:43, 1368:12, 1368:21, 1368:43, 1369:7, 1369:12, 1369:30, 1369:41, 1371:35, 1372:8, 1373:8, 1373:16, 1373:39, 1374:8, 1374:13, 1374:18, 1375:1, 1375:12, 1375:25, 1375:29, 1376:17, 1376:44, 1377:16, 1378:13, 1380:4, 1380:39, 1381:21, 1381:25, 1382:31, 1382:33, 1382:40, 1383:37, 1384:42, 1384:46, 1385:14, 1385:17, 1385:23, 1385:30, 1385:33, 1386:35, 1387:25, 1387:32, 1388:3, 1388:9, 1389:28, 1390:8, 1390:17, 1390:20, 1390:43, 1391:23, 1391:28, 1391:37, 1392:40, 1393:11, 1393:24, 1393:29, 1393:38, 1393:44, 1394:7, 1394:12, 1394:45, 1395:32, 1395:44, 1397:4, 1397:15, 1398:15, 1398:41, 1399:3, 1399:18, 1399:28, 1399:46, 1400:43, 1401:6, 1401:31, 1401:41, 1402:1, 1402:32, 1402:36, 1403:32, 1403:40, 1403:45, 1404:4, 1404:14, 1404:16, 1404:24, 1404:44, 1405:15, 1405:17, 1405:23, 1405:46, 1406:28, 1406:46, 1407:22, 1407:27, 1407:41, 1407:42, 1408:1, 1408:3, 1408:36, 1408:37, 1408:46, 1409:34, 1410:4, 1410:20, 1411:6, 1411:26, 1412:10, 1413:16, 1413:21, 1413:47, 1414:25, 1414:41, 1415:13, 1415:18, 1415:38, 1416:40, 1417:7, 1417:11, 1417:31, 1417:36, 1418:12, 1418:31, 1420:31,</p>	<p>1420:42, 1421:1, 1421:9, 1421:24, 1421:43, 1422:10, 1422:17, 1422:19, 1423:5, 1423:35, 1427:7, 1427:23, 1427:28, 1428:16, 1428:44, 1429:4, 1429:9, 1429:43, 1430:28, 1430:31, 1430:37, 1431:32, 1432:9, 1432:18, 1432:20, 1433:16, 1433:39, 1433:46, 1434:3, 1434:11, 1434:40, 1435:6, 1435:24, 1435:38, 1436:15, 1436:19, 1437:11, 1437:47, 1438:20, 1438:24, 1438:35, 1439:6, 1439:20, 1439:40, 1439:42, 1440:18, 1440:27, 1440:29, 1441:38, 1443:16, 1443:27, 1444:16, 1445:45, 1446:5, 1446:9, 1446:23, 1446:26, 1447:43, 1448:11, 1448:17, 1448:24, 1448:33, 1449:2, 1449:6, 1449:33, 1449:37, 1450:3, 1450:7</p> <p>Shimoon's [20] - 1365:20, 1365:21, 1365:42, 1368:28, 1375:17, 1376:9, 1379:27, 1380:19, 1383:29, 1387:15, 1391:9, 1398:43, 1400:45, 1428:1, 1437:3, 1437:21, 1446:21, 1446:29, 1446:34, 1447:37</p> <p>ship [6] - 1419:26, 1420:13, 1424:38, 1441:34, 1448:34</p> <p>Ship [1] - 1363:19</p> <p>shipment [6] - 1356:20, 1401:8, 1423:42, 1431:39, 1433:6, 1445:30</p> <p>shipping [9] - 1416:32, 1416:39, 1416:44, 1419:15, 1419:16, 1419:29, 1419:34, 1441:28</p> <p>short [23] - 1345:7, 1351:22, 1351:27, 1353:19, 1353:33, 1353:44, 1359:3, 1359:9, 1360:45, 1361:8, 1363:10, 1366:15, 1380:11, 1388:9, 1414:18, 1414:34, 1422:15,</p>	<p>1422:20, 1424:13, 1425:28, 1442:2, 1446:16, 1449:29</p> <p>short-form [1] - 1351:22</p> <p>shortly [9] - 1356:11, 1366:20, 1374:14, 1390:17, 1394:6, 1399:43, 1415:43, 1420:42, 1446:4</p> <p>show [4] - 1348:27, 1348:41, 1414:14, 1447:8</p> <p>shows [1] - 1400:28</p> <p>shut [1] - 1399:11</p> <p>shutting [2] - 1399:12, 1402:27</p> <p>side [1] - 1431:1</p> <p>sign [2] - 1416:46, 1417:7</p> <p>signature [4] - 1394:39, 1395:5, 1408:31, 1408:34</p> <p>signed [17] - 1347:44, 1348:29, 1348:46, 1365:2, 1367:13, 1376:3, 1383:46, 1408:31, 1408:32, 1411:42, 1419:6, 1426:20, 1426:46, 1429:1, 1440:22, 1442:27, 1446:3</p> <p>Signed [2] - 1418:42, 1442:28</p> <p>significance [4] - 1358:14, 1387:19, 1430:14, 1441:13</p> <p>significant [4] - 1413:46, 1414:24, 1420:20, 1420:32</p> <p>significantly [2] - 1388:31, 1420:44</p> <p>signs [1] - 1395:41</p> <p>similar [2] - 1435:32, 1441:8</p> <p>simple [1] - 1357:29</p> <p>simply [7] - 1368:35, 1368:37, 1405:45, 1418:20, 1423:15, 1423:35, 1431:5</p> <p>single [4] - 1357:31, 1358:9, 1414:16, 1437:40</p> <p>sit [4] - 1401:34, 1401:36, 1435:13, 1441:11</p> <p>Sitting [1] - 1423:4</p> <p>sitting [1] - 1432:36</p> <p>situation [2] - 1430:9, 1431:15</p> <p>six [9] - 1376:3, 1383:46, 1387:46, 1391:6, 1391:10, 1394:13, 1394:31, 1400:39</p> <p>sixth [1] - 1362:34</p> <p>size [1] - 1420:22</p> <p>skills [2] - 1357:6, 1357:9</p>	<p>Skynet [3] - 1383:2, 1383:9, 1384:45</p> <p>slightly [1] - 1432:41</p> <p>small [7] - 1355:27, 1357:4, 1357:7, 1374:35, 1405:42, 1410:18, 1423:8</p> <p>smart [1] - 1414:5</p> <p>smidgeon [2] - 1388:38, 1393:7</p> <p>so-called [1] - 1422:38</p> <p>Sold [1] - 1442:31</p> <p>sold [9] - 1351:28, 1352:2, 1356:11, 1356:17, 1356:20, 1356:24, 1356:25, 1356:28, 1443:22</p> <p>solely [1] - 1352:42</p> <p>solicitor [1] - 1399:38</p> <p>solve [2] - 1433:17, 1433:30</p> <p>someone [4] - 1349:13, 1385:47, 1400:32, 1426:33</p> <p>something's [1] - 1447:36</p> <p>sometime [4] - 1346:18, 1354:31, 1362:3, 1379:45</p> <p>sometimes [1] - 1398:25</p> <p>somewhat [2] - 1389:15, 1396:22</p> <p>somewhere [7] - 1382:39, 1390:9, 1392:19, 1407:37, 1407:40, 1407:45, 1408:11</p> <p>soon [4] - 1360:2, 1371:18, 1409:41, 1410:22</p> <p>sorry [8] - 1355:13, 1374:43, 1385:18, 1416:19, 1417:3, 1419:32, 1438:36, 1443:28</p> <p>Sorry [5] - 1374:20, 1374:31, 1374:45, 1405:15, 1438:39</p> <p>sort [3] - 1399:16, 1405:11, 1417:32</p> <p>sorts [3] - 1380:20, 1396:45, 1397:17</p> <p>sought [1] - 1443:31</p> <p>source [1] - 1369:42</p> <p>South [1] - 1351:40</p> <p>speaking [2] - 1408:2</p> <p>specific [6] - 1361:27, 1380:22, 1380:39, 1380:44, 1413:39, 1435:21</p> <p>specifically [8] - 1357:19, 1358:20, 1361:1, 1364:42, 1366:36, 1388:28, 1390:16, 1408:42</p> <p>specifics [1] - 1371:18</p>
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<p>specifies [1] - 1423:34 speculate [2] - 1401:26, 1403:19 speculated [2] - 1401:3, 1402:11 speculating [1] - 1408:40 speculation [4] - 1401:5, 1401:19, 1401:21, 1401:23 spent [1] - 1389:38 split [1] - 1389:17 Split [1] - 1427:45 spoken [3] - 1407:9, 1407:47, 1448:17 stage [24] - 1347:4, 1347:19, 1347:21, 1349:15, 1349:22, 1349:41, 1352:27, 1352:39, 1356:16, 1360:30, 1364:24, 1368:43, 1372:20, 1380:39, 1395:24, 1404:3, 1404:40, 1407:38, 1411:35, 1417:15, 1420:24, 1439:21, 1439:40, 1449:16 stages [4] - 1357:35, 1361:2, 1364:21, 1364:27 stall [1] - 1417:16 stand [2] - 1398:23, 1422:14 start [2] - 1398:16, 1441:27 started [3] - 1364:30, 1441:26, 1448:16 state [9] - 1370:23, 1386:22, 1387:34, 1388:4, 1388:30, 1396:27, 1396:37, 1396:43, 1396:44 State [6] - 1346:2, 1381:41, 1382:25, 1392:23, 1396:23, 1418:2 statement [45] - 1345:11, 1345:15, 1345:18, 1348:5, 1348:7, 1348:12, 1348:27, 1348:29, 1348:45, 1358:41, 1368:9, 1368:28, 1373:38, 1373:46, 1376:42, 1377:10, 1378:27, 1378:34, 1378:36, 1379:44, 1384:26, 1384:29, 1384:31, 1384:39, 1385:12, 1385:22, 1398:9, 1398:14, 1399:36, 1399:40, 1407:19, 1407:35, 1409:6, 1409:23, 1415:36, 1426:19, 1426:45, 1429:1, 1430:32,</p>	<p>1436:23, 1446:3, 1448:17 Statement [3] - 1348:24, 1348:38, 1349:5 statements [7] - 1348:1, 1350:21, 1374:6, 1397:17, 1398:10, 1409:27, 1438:9 States [3] - 1345:32, 1425:20, 1443:37 states [4] - 1370:21, 1370:36, 1372:12, 1446:46 stating [2] - 1366:2, 1447:6 status [1] - 1433:5 statutory [6] - 1346:42, 1346:45, 1346:46, 1347:10, 1347:38 Statutory [2] - 1347:7, 1347:16 still [9] - 1358:24, 1378:29, 1384:15, 1390:31, 1395:18, 1395:33, 1396:3, 1396:41, 1443:43 stock [1] - 1379:16 stood [1] - 1362:14 stop [1] - 1422:24 stopped [2] - 1431:15, 1433:40 story [2] - 1364:30, 1439:26 straight [1] - 1436:41 stream [1] - 1441:35 Street [1] - 1344:31 strictly [1] - 1355:16 struck [3] - 1406:6, 1417:6, 1421:9 structures [1] - 1366:31 stuff [3] - 1399:16, 1432:36, 1434:45 subheading [6] - 1362:36, 1416:26, 1416:31, 1418:27, 1419:11, 1420:5 subject [3] - 1349:32, 1350:27, 1449:26 submission [1] - 1381:36 submitted [1] - 1424:39 submitting [1] - 1373:43 subsequent [2] - 1361:37, 1379:45 subsequently [2] - 1346:32, 1446:19 substance [2] - 1358:14, 1444:28 substantial [1] - 1373:39 substantially [1] - 1414:4 success [1] - 1401:14 successful [1] - 1400:38 sufficient [1] - 1445:12 suggest [23] - 1346:15, 1361:18, 1361:24, 1361:31, 1382:35, 1383:13, 1385:25,</p>	<p>1385:32, 1389:25, 1390:24, 1394:44, 1395:8, 1396:28, 1401:18, 1408:18, 1408:20, 1410:26, 1417:5, 1419:5, 1421:22, 1422:27, 1434:30, 1439:19 Suggested [1] - 1391:2 suggested [5] - 1356:20, 1361:22, 1361:28, 1412:17, 1422:26 Suggesting [2] - 1362:41, 1373:2 suggesting [10] - 1368:23, 1384:4, 1384:20, 1398:4, 1410:27, 1420:9, 1422:27, 1439:30, 1443:2, 1443:43 suggestion [5] - 1369:19, 1385:35, 1405:20, 1409:3, 1448:33 suggests [6] - 1382:37, 1385:22, 1421:36, 1430:8, 1434:25, 1443:41 sum [8] - 1346:8, 1346:26, 1405:42, 1423:15, 1423:18, 1423:34, 1427:41, 1430:7 supervision [1] - 1424:33 supplied [4] - 1382:30, 1395:25, 1395:28, 1396:23 supplier [3] - 1364:23, 1387:2, 1396:38 suppliers [2] - 1346:12, 1429:32 supply [11] - 1346:3, 1369:43, 1370:3, 1370:43, 1371:4, 1371:29, 1372:24, 1396:36, 1406:31, 1432:13, 1440:35 suppose [3] - 1387:19, 1390:12, 1412:37 Surely [1] - 1401:10 surprise [2] - 1378:17, 1390:12 surprised [3] - 1391:45, 1420:22, 1441:23 surrounding [1] - 1374:32 suspect [2] - 1407:43, 1408:35 suspected [1] - 1415:30 sworn [1] - 1346:47 Sworn [1] - 1347:8 Sydney [2] - 1344:31, 1432:3 Syria [3] - 1356:18, 1356:21, 1356:30</p>	<p>system [7] - 1359:25, 1359:27, 1386:45, 1424:43, 1425:2, 1435:35, 1447:28</p> <p style="text-align: center;">T</p> <p>table [2] - 1345:24, 1345:34 Table [2] - 1345:30, 1345:39 tables [2] - 1345:23, 1346:22 talks [3] - 1421:31, 1427:40, 1439:10 taxi [2] - 1380:21, 1434:18 taxis [1] - 1380:34 telephone [6] - 1359:14, 1366:11, 1375:17, 1405:8, 1447:30, 1447:33 telephoned [2] - 1359:15, 1359:16 template [1] - 1365:45 tend [1] - 1408:2 tended [1] - 1435:33 tender [103] - 1346:42, 1347:3, 1348:22, 1348:36, 1349:3, 1349:15, 1349:19, 1349:28, 1368:2, 1370:4, 1370:13, 1373:3, 1373:23, 1373:44, 1374:12, 1375:5, 1376:20, 1377:11, 1377:25, 1377:34, 1377:40, 1378:4, 1378:23, 1379:6, 1379:7, 1379:18, 1379:25, 1379:43, 1379:45, 1379:46, 1381:34, 1381:35, 1382:3, 1383:43, 1383:47, 1384:4, 1384:40, 1385:5, 1386:18, 1386:21, 1387:25, 1387:33, 1387:43, 1388:11, 1388:31, 1388:39, 1388:44, 1389:27, 1390:19, 1390:21, 1390:25, 1390:40, 1391:14, 1391:18, 1392:6, 1393:3, 1393:26, 1393:33, 1393:43, 1394:5, 1394:13, 1394:32, 1396:23, 1396:33, 1400:26, 1402:44, 1403:4, 1404:5, 1406:31, 1406:33, 1407:29, 1409:14, 1410:11, 1417:37, 1418:35, 1418:47, 1419:7, 1419:9, 1420:14,</p>	<p>1420:36, 1438:15, 1438:19, 1438:23, 1438:27, 1438:34, 1438:42, 1438:43, 1439:20, 1439:22, 1439:37, 1440:2, 1440:9, 1440:10, 1440:23, 1441:4, 1441:9, 1441:19, 1441:40, 1442:44, 1448:15 tendered [7] - 1349:33, 1349:41, 1378:15, 1415:39, 1438:10, 1441:18, 1450:2 tendered-for [1] - 1415:39 tenders [2] - 1360:46, 1421:26 Teresa [1] - 1350:41 term [10] - 1361:34, 1363:1, 1372:28, 1380:24, 1397:20, 1397:23, 1397:25, 1413:37, 1414:34, 1447:32 terms [31] - 1345:16, 1353:22, 1353:28, 1354:12, 1356:47, 1357:22, 1357:28, 1357:29, 1357:36, 1358:26, 1359:29, 1359:43, 1369:24, 1370:19, 1370:23, 1370:26, 1370:28, 1370:44, 1371:4, 1371:28, 1373:19, 1380:11, 1382:18, 1403:47, 1411:10, 1413:40, 1414:1, 1414:46, 1421:31, 1438:13 terrible [4] - 1394:16, 1408:4, 1440:43, 1442:21 terrific [1] - 1359:29 testimony [3] - 1404:32, 1407:19, 1424:17 theme [1] - 1364:34 thereabouts [2] - 1379:28, 1442:45 thereafter [3] - 1360:2, 1360:9, 1394:6 therefore [1] - 1420:28 thinking [4] - 1373:29, 1376:22, 1427:33, 1437:39 thinks [1] - 1407:39 Third [2] - 1349:5, 1355:44 third [12] - 1359:35, 1362:15, 1383:22, 1386:19, 1394:21, 1409:8, 1409:26, 1426:45, 1438:9, 1440:44, 1446:2,</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------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<p>1446:32 thirds [3] - 1362:35, 1395:44, 1399:25 thorough [2] - 1399:33, 1399:35 thoroughly [1] - 1358:9 thoughts [1] - 1393:16 thousand [1] - 1388:10 three [7] - 1347:38, 1348:1, 1365:2, 1369:16, 1384:7, 1384:8, 1447:25 Throughout[1] - 1356:5 throughout [1] - 1381:25 ticks [1] - 1370:8 timing [1] - 1400:23 today [31] - 1346:41, 1346:44, 1348:2, 1349:13, 1349:33, 1377:6, 1379:11, 1394:26, 1401:17, 1403:1, 1413:19, 1421:16, 1422:12, 1426:20, 1426:46, 1429:2, 1429:7, 1429:18, 1430:11, 1430:16, 1434:3, 1434:4, 1434:20, 1435:13, 1438:10, 1438:15, 1441:11, 1446:3, 1447:17, 1448:17, 1450:22 together [7] - 1367:27, 1373:19, 1379:25, 1392:6, 1419:7, 1424:27, 1425:11 tonne [1] - 1382:14 Tony[1] - 1426:33 took [10] - 1354:27, 1373:15, 1374:47, 1381:22, 1381:47, 1436:9, 1436:13, 1436:37, 1441:5, 1448:5 top [9] - 1374:27, 1375:7, 1375:16, 1376:15, 1414:10, 1416:15, 1418:26, 1433:15, 1434:14 topic [4] - 1375:40, 1429:44, 1432:39, 1442:20 total [7] - 1409:43, 1418:4, 1420:18, 1420:19, 1423:18, 1430:20, 1437:21 totally [1] - 1414:8 tough [1] - 1409:1 towards [4] - 1354:32, 1355:40, 1360:34, 1443:38 town [2] - 1371:1, 1382:22 Trabil[2] - 1433:40, 1434:1 trade [3] - 1417:15,</p>	<p>1426:35, 1432:11 Trade[8] - 1363:33, 1363:40, 1424:23, 1424:40, 1424:46, 1425:12, 1425:35, 1432:4 trader [7] - 1355:2, 1357:45, 1358:18, 1389:4, 1391:42, 1404:33, 1445:36 traders [4] - 1356:6, 1356:43, 1362:41, 1362:42 Trading[1] - 1352:7 trading [1] - 1352:27 transaction [16] - 1358:9, 1390:12, 1414:20, 1414:25, 1414:28, 1419:20, 1419:42, 1427:31, 1430:27, 1431:10, 1432:1, 1437:35, 1437:37, 1437:40, 1447:4, 1448:20 transactions [1] - 1354:9 transferred [1] - 1406:39 transport [1] - 1433:1 travel [2] - 1381:12, 1386:44 travelled [1] - 1436:22 travelling [1] - 1407:45 tremendous [1] - 1416:12 trends [1] - 1354:8 Trh[1] - 1344:25 trip [1] - 1448:44 trips [2] - 1364:31, 1408:7 truck [4] - 1431:15, 1431:40, 1433:32, 1434:4 trucked [1] - 1371:21 trucking [1] - 1371:25 trucks [2] - 1433:40, 1434:37 true [3] - 1368:42, 1424:47, 1428:34 trust [4] - 1395:46, 1399:26, 1401:7, 1402:3 trusted [1] - 1402:3 trusts [2] - 1395:46, 1401:2 truth [1] - 1415:12 truthful [1] - 1368:9 try [12] - 1359:26, 1359:28, 1379:32, 1385:28, 1400:8, 1401:12, 1413:21, 1422:40, 1433:17, 1437:45, 1438:13, 1441:12 trying [7] - 1371:37, 1374:43, 1376:46, 1378:8, 1381:30, 1408:33, 1415:32</p>	<p>turn [4] - 1356:41, 1358:25, 1361:37, 1373:32 turned [5] - 1356:21, 1413:10, 1414:1, 1414:3, 1414:4 turning [1] - 1398:46 turns [2] - 1425:17, 1438:42 two [28] - 1346:42, 1348:29, 1349:40, 1349:41, 1350:5, 1356:30, 1362:17, 1362:35, 1373:19, 1375:46, 1381:33, 1382:7, 1383:19, 1389:25, 1390:36, 1391:17, 1395:44, 1399:25, 1407:34, 1414:31, 1430:19, 1440:18, 1440:28, 1441:14, 1441:15, 1442:18, 1445:37, 1447:22 Two[1] - 1350:8 two-page [1] - 1348:29 two-thirds [1] - 1362:35 type [3] - 1362:8, 1431:2, 1440:7 types [3] - 1398:24, 1398:29, 1398:32 typical [1] - 1367:10</p>	<p>1362:45, 1363:27, 1370:16, 1375:16, 1379:44, 1394:7, 1407:28, 1409:13, 1412:29, 1412:47, 1424:18, 1424:32, 1428:25, 1430:20, 1438:15, 1438:19, 1438:23, 1438:34, 1440:10, 1440:23, 1440:29, 1443:22 underneath [2] - 1380:2, 1394:22 understood [16] - 1360:2, 1360:35, 1362:30, 1367:4, 1372:19, 1372:27, 1372:29, 1379:20, 1380:19, 1387:35, 1388:3, 1388:7, 1392:24, 1424:43, 1433:1, 1434:10 undertaking [2] - 1426:47, 1427:2 Une [1] - 1439:13 unedited [2] - 1445:10, 1445:14 Unfortunately [2] - 1430:33, 1430:36 unfortunately [1] - 1445:11 United [16] - 1345:21, 1345:31, 1349:24, 1363:26, 1363:32, 1372:19, 1372:20, 1372:26, 1372:28, 1372:30, 1425:20, 1425:21, 1425:34, 1426:6, 1442:11, 1443:37 university [1] - 1380:42 University [1] - 1359:37 unless [1] - 1447:7 unlike [2] - 1402:2, 1410:3 unlikely [1] - 1391:10 unusual [3] - 1389:3, 1389:11, 1389:12 unwilling [1] - 1405:45 up [29] - 1352:47, 1355:40, 1356:21, 1359:4, 1359:9, 1359:24, 1359:26, 1359:27, 1360:14, 1369:47, 1371:35, 1379:35, 1384:26, 1387:38, 1394:16, 1395:43, 1402:34, 1405:11, 1412:36, 1419:46, 1423:28, 1426:2, 1430:30, 1430:42, 1431:13, 1434:26, 1436:47, 1440:12, 1444:14 update [1] - 1433:5 upfront [14] - 1397:9,</p>	<p>1397:15, 1397:33, 1397:46, 1398:3, 1398:15, 1399:24, 1399:27, 1400:17, 1401:6, 1401:35, 1402:4, 1402:12, 1402:13 upset [2] - 1421:1, 1421:5 upside [1] - 1418:28 Us\$1 [1] - 1378:40 Us\$740 [1] - 1421:17 Us\$750 [3] - 1376:25, 1378:29, 1378:35 Us\$76,023 [1] - 1345:33 Us\$80,000 [2] - 1346:21, 1346:26 Us\$825 [1] - 1376:21 Us\$83,988 [1] - 1345:34 Us\$836,252 [1] - 1345:27 Us\$923,867 [1] - 1345:28 Usa [1] - 1445:39 Usd [1] - 1403:2 usual [4] - 1371:4, 1394:1, 1437:28, 1437:32</p>
V				
<p>value [6] - 1345:26, 1345:31, 1418:4, 1419:46, 1422:6, 1431:42 variable [1] - 1357:41 variations [2] - 1357:42, 1392:39 various [8] - 1351:24, 1354:43, 1361:1, 1379:1, 1397:18, 1398:8, 1416:7, 1444:25 vary [2] - 1358:26, 1392:35 version [3] - 1370:7, 1432:41, 1449:6 versions [1] - 1445:10 via [5] - 1363:32, 1373:5, 1425:34, 1425:42, 1448:29 view [4] - 1398:26, 1400:37, 1437:39, 1441:27 vigorous [1] - 1432:17 Vii [1] - 1360:19 Viii [2] - 1360:21, 1360:35 violation [1] - 1345:36 virtually [1] - 1354:4 Volcker [17] - 1391:33, 1429:28, 1429:36, 1429:47, 1430:12, 1435:19, 1435:28, 1435:30, 1435:31, 1435:34, 1435:35, 1435:36, 1446:11, 1446:24, 1446:33, 1448:3, 1449:8</p>				

<p>volcker [1] - 1432:31 volume [3] - 1349:28, 1349:36, 1349:45 Volume [2] - 1350:2, 1350:8 voluminous [1] - 1426:5</p>	<p>1347:26, 1347:28, 1348:22, 1348:27, 1348:36, 1348:41, 1349:2, 1349:10, 1349:27, 1349:39, 1350:11, 1355:16, 1367:29, 1369:4, 1371:18, 1374:2, 1374:35, 1376:42, 1377:23, 1377:33, 1381:2, 1387:19, 1395:15, 1396:10, 1396:12, 1396:21, 1396:46, 1398:45, 1399:13, 1401:3, 1401:29, 1405:40, 1409:28, 1410:34, 1411:4, 1411:16, 1412:1, 1415:27, 1417:18, 1419:24, 1420:5, 1422:12, 1423:12, 1428:33, 1428:43, 1429:12, 1430:18, 1431:46, 1432:39, 1440:17, 1441:25, 1442:18, 1442:43, 1443:2, 1444:7, 1445:10, 1445:19, 1450:1, 1450:9, 1450:22 willing [1] - 1391:26 wisdom [1] - 1398:31 wish [5] - 1367:43, 1374:6, 1390:38, 1415:25, 1439:38 Withdrew [1] - 1450:18 withdrew [1] - 1442:7 witness [5] - 1345:2, 1346:40, 1435:13, 1442:7, 1442:14 Witness [6] - 1396:19, 1419:22, 1428:31, 1442:2, 1442:16, 1450:18 witnesses [2] - 1346:43, 1347:20 won [1] - 1440:39 Woolworths [1] - 1418:26 word [10] - 1361:21, 1377:8, 1379:9, 1381:14, 1397:9, 1400:41, 1406:5, 1422:14, 1428:24, 1428:26 Word [2] - 1418:30, 1418:32 wording [1] - 1367:37 words [22] - 1361:9, 1361:10, 1369:16, 1375:21, 1380:3, 1380:4, 1380:5, 1380:6, 1380:13, 1386:4, 1386:30, 1388:6, 1396:21, 1397:14, 1397:32, 1397:37, 1398:2, 1398:47,</p>	<p>1405:29, 1418:41, 1419:4, 1423:9 works [1] - 1388:37 World [1] - 1355:45 world [3] - 1387:3, 1392:33, 1398:21 worth [1] - 1432:35 write [2] - 1415:31, 1430:36 writing [14] - 1353:24, 1353:31, 1366:16, 1366:22, 1375:30, 1375:36, 1376:10, 1404:38, 1407:1, 1407:8, 1410:5, 1414:32, 1426:23 written [3] - 1375:7, 1408:30, 1414:40 wrote [5] - 1364:12, 1393:28, 1397:34, 1399:29, 1443:42</p>
W		
<p>waiting [2] - 1431:45, 1433:32 Wales [1] - 1351:40 wants [4] - 1375:21, 1376:2, 1376:24, 1383:46 war [2] - 1441:26, 1444:26 Ward [34] - 1346:46, 1347:1, 1347:7, 1354:26, 1359:4, 1361:43, 1362:3, 1365:1, 1366:42, 1370:9, 1399:45, 1402:31, 1402:36, 1403:35, 1404:16, 1404:18, 1406:8, 1407:46, 1408:12, 1408:14, 1408:30, 1408:33, 1408:46, 1409:1, 1415:37, 1415:38, 1416:23, 1417:30, 1417:35, 1417:44, 1418:12, 1420:9, 1420:17 Wards [5] - 1406:11, 1415:45, 1418:16, 1419:5, 1421:14 Waring [1] - 1352:28 washed [1] - 1399:4 weakening [1] - 1403:24 wear [1] - 1403:23 week [1] - 1348:2 weekend [1] - 1431:38 weeks [2] - 1399:31, 1399:32 western [3] - 1398:22, 1398:27, 1398:31 Westpac [2] - 1419:12, 1419:15 whatsoever [2] - 1356:34, 1393:37 wheat [1] - 1355:12 whereby [2] - 1407:22, 1430:7 whilst [4] - 1352:38, 1358:25, 1389:28, 1427:34 White [3] - 1352:31, 1352:35, 1352:43 whole [4] - 1389:17, 1391:13, 1400:42, 1400:45 Whole [1] - 1372:2 widely [1] - 1358:27 Wigney [63] - 1345:7, 1347:10, 1347:19,</p>	<p>Xi [2] - 1438:23, 1438:31 Xii [5] - 1438:34, 1439:20, 1440:11, 1440:13, 1443:30 Xiii [4] - 1440:11, 1440:13, 1440:15, 1443:30</p>	
X		
Y		
<p>year [8] - 1345:12, 1353:3, 1353:7, 1353:22, 1379:45, 1443:38, 1448:25, 1449:2 years [6] - 1355:19, 1355:41, 1376:47, 1441:15, 1445:37, 1447:25 yesterday [7] - 1427:25, 1429:16, 1430:35, 1434:2, 1448:18, 1449:34 York [1] - 1425:4 young [1] - 1443:25 yourself [6] - 1351:33, 1354:47, 1368:12, 1399:14, 1406:38, 1424:44 yourselves [1] - 1426:6</p>	<p>Y</p>	