"MADELEINE" CLOSING STATEMENT TRANCHE 1

I: Introduction

- 1. "Madeleine" has read and adopts in full the Closing of the Cat H CPs, without repeating it. That Closing is of particular relevance to her. She is one of the women with whom UCOs in the T1 period are known to have had deceitful sexual relationships. Further due to difficulties in tracing and contacting the other women, or because they are deceased, she is one of only two women who has given evidence about sexual relationships in T1.
- Madeleine submits that her experiences exemplify many of the themes in the Cat H Closing including:
 - The deep intrusions into homes and private lives to which law-abiding members of the public like Madeleine, their family and friends were exposed as a result of the SDS' unlawful and unjustified operations;
 - (2) The risks and dangers to which women were exposed as a result of the SDS' unlawful and unjustified operations;
 - (3) The consequences for women of the 'cult of masculinity' identified in the 1983 PSI Police in Action report.
 - (4) The limited reliability of some police officers' evidence to the Inquiry due to the powerful code of 'backing each other up'.
- 3. In this Closing she sets out those experiences, and the conclusions she draws from them.

II: Madeleine's political activism

- 4. Madeleine has given two witness statements and oral evidence¹ in which she has detailed the political activism which began in her early teens and continued into her twenties, inspired by her parents' experience of extreme poverty and of war and their strong anti-fascism. She has explained the anti-war, anti-fascist and anti-capitalist beliefs which led to her joining the International Socialists, and later the Socialist Workers Party, at 14 or 15 years old in order to create a fairer and more equal society. She has told how as a bus conductor in her twenties she was a trade unionist in the Transport and General Workers Union, sitting on a regional women's sub-committee, following which her political activities waned, and she re-trained as an artist, teaching in schools and community groups.
- 5. It is plain from her evidence, and from that of the UCOs who spied on her, that Madeleine has never been involved in any violence, was never arrested and never convicted for a criminal offence.
- 6. Despite this, the evidence shows that in 1970 when still a child of 16, Madeleine had a Special Branch Registry File.

III: Surveillance by the SDS and Vincent Harvey

- 7. Vincent Harvey (alias "Vince Miller" and cipher HN354) was deployed with the SDS from late 1976/ early 1977 until 1979. He infiltrated the Socialist Worker Party, Walthamstow Branch. He has provided the Inquiry with two written statements and oral evidence in open². Vincent Harvey was friends with Richard Clark³ and HN21⁴, both of whom had sexual relationships in their cover identities.
- 8. In 1977, by the time Madeleine was aged 23, an SDS undercover police officer, Vincent Harvey, was infiltrating her home and private life in his covert identity. For the next two years, while frequently attending public SWP meetings and private gatherings at her home, Harvey produced regular secret reports relating to her (and others) which

¹ 'Madeleine' {UCPI0000034313}; {UCPI0000034818}; T1P2 {Day13}.

² Harvey/ HN354 {MPS-0744903}; {MPS-0747657}; T1P2 {Day14/18l}.

³ Harvey T1/P2 {Day 14,/63-64}

⁴ Harvey T1P2 {Day14/59:8-10}.

were shared with the Security Service. The reports included physical descriptions of her, and details about her family relationships, her political beliefs and her occupation.

- 9. In 1979, by the time Madeleine was 25, Vince Miller, as Harvey was then known, started a sexual relationship with her which lasted around two months. The relationship had a deep emotional impact on Madeleine for some time. It was one of four sexual relationships he has admitted to while undercover.
- 10. After he was withdrawn from his deployment in the autumn of 1979, pretending to have gone to the USA, Harvey went on to assume senior roles in the police force, including leading Operation Pragada, an investigation into child abuse at Lambeth Children's Services and becoming National Director of the National Criminal Intelligence Service (NCIS).
- 11. In relation to the operations of the SDS, Madeleine relies on the summary of evidence in the Cat H Closing at §47-74. She adds the following about the evidence specific to the deployment of Vincent Harvey.
- 12. Vincent Harvey (HN354) had not been tasked to infiltrate either the SWP or the branches Madeleine was a member of, or Madeleine herself.⁵ He was asked to 'observe and then become involved in an active subversive group that were of interest to S[pecial] *B*[ranch]'. He chose the targets of his operation himself and used his own judgment about what to report.⁶ His role was to gather both information and intelligence regarding potential public order problems and activities defined as subversive by the Security Service; he wasn't provided with any other information about the intended targets of his work.⁷
- 13. Harvey's tasking was not changed or refined at any point during his three-year deployment.⁸
- 14. He worked seven days a week, 14 hours a day and earned substantial overtime.9

⁵ HN354 §§68-9 {MPS-0747657/15}.

⁶ HN354 §72, §74 {MPS-0747657/16}.

⁷ HN354 §70, §72 {ibid.}.

⁸ HN354 §73 {ibid.}.

 $^{^9}$ HN354 \$ 84-85 and 90 {MPS-0747657/18-20}.

- 15. Harvey viewed his position as treasurer of SWP committees and branches as a *'fantastic'* opportunity and used this position of trust to gather financial information on members, including bank details, addresses, occupations and living arrangements. He then reported this information to the SDS expecting that it would be of use to the Security Service.¹⁰ He also reported information about children because the SWP had youth movements and he considered the information important to Special Branch and the Security Service.¹¹
- 16. The SWP branches that Madeleine was involved with engaged in entirely open, and lawful political activities whose central aim was to create a fairer society. They held weekly public meetings, sold newspapers in public, attended demonstrations in public and some members joined trade unions.¹² Madeleine has made plain that neither she nor her fellow members supported violence in any shape or form, and were strongly opposed to any form of terrorism.¹³ Julia Poynter, who was a fellow SWP activist in the same group, has confirmed this in her written evidence.¹⁴
- 17. Harvey explains that a general strike rather than violence was the mechanism envisaged by the SWP for achieving change, although 'street violence was ...permissible against the fascists',¹⁵ and he agrees that 'acts of individual violence were positively discouraged by the SWP'.¹⁶ Even when attacked by the National Front, few SWP members would engage in violence.¹⁷
- 18. The evidence suggests that disorder and violence involving the SWP, when it occurred, was instigated by the National Front, took place at events organised by them and was thus predictable.¹⁸ Where violence was envisaged in self-defence against the National Front '[t]*here was often a great deal of rhetoric and language that was much stronger than action that followed*'.¹⁹

¹⁰ HN354 §112 {MPS-0747657/24}, §113 {MPS-0747657/25}, §119 {MPS-0747657/26}, and §133 {MPS-0747657/29}.

¹¹ HN354 §132 {MPS-0747657/29}.

 $^{^{12}\ &#}x27;Madeleine'\ 1\ \$\$18-20\ \{UCPI0000034313/6\}.$

¹³ {Day13T1P2/10-11, 30}.

¹⁴ First Statement of Julia Poynter §68 {UCPI0000034801/19}.

 $^{^{15}\,}HN354$ §136 and §162 {MPS-0747657/30}; {MPS-0747657/35}.

¹⁶ {Day14T1P2/198}

¹⁷ HN 354 §101 {MPS-0747657/22}.

¹⁸ HN354 §§156-160 {MPS-0747657/34}.

¹⁹ {Day14T1P2/176}.

- 19. Madeleine and her fellow SWP members did not believe revolution was imminent²⁰ and did not think they could 'overthrow' any part of the state.²¹ In terms of a revolution 'there was an awful lot talked about and very little action in that direction'.²² They 'were far more interested in building the working class movement' and sought instead to raise awareness in the working class and build a mass movement through their campaigning activities, including selling papers, trade union activities and protests.²³
- 20. Much of the benefit of SDS intelligence was cumulative rather than related to individuals, confirmation of an absence of risk rather than a presence of risk, and was said to have permitted accurate deployment of police resources at demonstrations.²⁴
- 21. The SDS was a club within a club and ranks were not particularly important;²⁵ he called in and spoke to managers every morning²⁶ and attended meetings with them in safe houses twice a week.²⁷
- 22. Harvey was withdrawn from deployment in autumn 1979 because he was promoted.²⁸

IV: Vincent Harvey's sexual relationships

- 23. Harvey said he was in a long-term relationship when he was deployed and the relationship ended during his time with the SDS. He says he nonetheless had four *'sexual encounters'* with four different women²⁹, 'Madeleine', a member of SWP, two women who were not members of SWP but "friends of friends."
- 24. He initially said these were all 'sometime after [he] had split up with the previous long-term partner' but was 'not sure about the timing of these sexual encounters'³⁰ and his 'memory of that time is not that clear'.³¹ These 'things happened more than 40 years ago, most of the evening events involved consumption of alcohol, [and] they were disconnected from my "real"

²⁰ {Day13T1P2/8-9}; First Statement of Julia Poynter §87 {UCPI0000034801/19}.

²¹ HN354, {Day14T1P2/197}.

²² HN354, {Day14T1P2/197-8}.

²³ HN354, {Day14T1P2/197-8}.

²⁴ HN354 §207 {MPS-0747657/44}.

 $^{^{25}\,\}rm{HN354}$ §187, {MPS-0747657/40}.

 $^{^{26}\,}HN354$ §189 {MPS-0747657/41}.

 $^{^{27}\,\}rm{HN354}$ §76, {MPS-0747657/17}.

 $^{^{28}}$ HN354 §177, {MPS-0747657/38}.

²⁹ Harvey/ HN354 {MPS-0744903/35}

³⁰ HN354 §235 {MPS-0747657/49}.

³¹ HN354 §236 {MPS-0747657/50}.

life'.³² He later accepted that two sexual encounters took place at the start of his deployment when he was still in a relationship.³³

- 25. Harvey met Madeleine in 1977, and regularly visited her house after meetings.³⁴ Madeleine recalls their sexual relationship beginning probably at the end of summer 1979³⁵ and continuing for two months. He initiated a relationship during a party³⁶. He told 'Madeleine' that he had had "*his heart broken*" by his former fiancé and "*as a result he had closed down emotionally and kept women at arm's length*." and he "*had a difficult childhood*"³⁷. 'Madeleine' said that these stories elicited feelings of sympathy from her³⁸. She recalled him leaving in the early hours of the morning as a pattern of behaviour³⁹. Her flatmates knew and "*everybody knew*" that there was something going on between them.⁴⁰
- 26. Her feelings grew stronger, and she hoped they would become a couple⁴¹ but he started to withdraw, blaming the past traumatic relationship.⁴² Soon afterwards Harvey disappeared altogether, claiming to have left for the USA. She was very upset.⁴³ Madeleine's account is corroborated by Julia Poynter, who had not until recently seen Madeleine for 30 years,⁴⁴ and an entry from her friend's diary which refers to Vincent Harvey/ HN354 as 'Madeleine's 'ex-lover'⁴⁵
- 27. Harvey's recollection is that he had sex with Madeleine only once.⁴⁶ He was 'single and in my 20s at the time, ..had to mingle and network socially and consume alcohol in order to maintain [his] cover. [He] was living a strange double-life and...did not think [he] was putting anyone's feelings at risk'.⁴⁷ As a single man in his 20s, [I]t 'would have appeared odd to have

³² HN354 §237 {ibid.}.

³³ {Day14T1P2/124}.

³⁴ Madeleine §§60-61 {UCPI0000034313/21}.

³⁵ Madeleine §67 {UCPI0000034313/23}.

³⁶ 'Madeleine' T1P2 {Day13/95:4} - {Day13/98:25}.

³⁷ 'Madeleine' {UCPI0000034313/25} at §75.

³⁸ Madeleine' {UCPI0000034313/25} at §75-77.

³⁹ 'Madeleine' T1P2 {Day 13/104:11-23}.

^{40 &#}x27;Madeleine' T1P2 {Day13/106:3-13}.

⁴¹ 'Madeleine' T1P2 {Day13/105:23-25}.

⁴² Madeleine §§71-80 {UCPI0000034313/24-26}.

⁴³ Madeleine §82, §84 {UCPI0000034313/27}.

⁴⁴ See Poynter 1 §17 {UCPI0000034801/5}, §§29-34 {UCPI0000034801/8-9}.

^{45 {}UCPI000034310}

 $^{^{46}\,}HN354$ §246 {MPS-0747657/53}.

⁴⁷ HN354 §248 {MPS-0747657/54}.

acted otherwise'⁴⁸ and 'people would expect you to have some kind of relationship',⁴⁹ A "byproduct" of his relationship with 'Madeleine' was that it discouraged advances from a gay man who was "becoming persistent"⁵⁰. Vincent Harvey said that he did not use stories he told 'Madeleine' about his background as a 'ploy' but "as a cover story for protection"⁵¹. He did not think about the effect that it might have on women. He said that the idea of sending a postcard postmarked from the USA after he left his deployment was a supervisor's idea and not his own.⁵²

- 28. He did not tell his colleagues or managers or anyone else about 'the one-night stands' he had while undercover⁵³ because he 'didn't attribute it much importance' and he finds it 'very difficult to answer' whether 'sexual activity in [his] cover identity [was] permitted'.⁵⁴ He does not recall guidance for sexual relationships,⁵⁵ and suspects it was left to his own judgement how far to become involved in the private lives of those met undercover⁵⁶ although HN34 (Geoffrey Craft) had told him not to start a relationship with Julia Poynter.⁵⁷ He accepts it 'was morally questionable' for him to have a sexual relationship with a member of the public while undercover over a long period of time⁵⁸ and that Madeleine would not have had a sexual relationship with him had she known he was an undercover police officer,⁵⁹ something she has confirmed.⁶⁰ Stricter guidance and firmer supervision would probably have led to Harvey making different decisions on sexual relationships.⁶¹
- 29. He didn't use contraception because 'my perception was that as a full feminist socialist supporter, then if there was any need for protection, then she would have mentioned it...this was a member of the women's movement, and things like that...'.⁶² He did not use

- ⁴⁹ {Day14T1P2/109}.
- ⁵⁰ Harvey T1P2 {Day14/109:18-24}.
- ⁵¹ Harvey T1P2 {Day14/105:21-25}.
- ⁵² Harvey T1P2 {Day14/258:10 20}.
- ⁵³ HN354 §250 {MPS-0747657/54}.
- ⁵⁴ HN354 §§168-169 {MPS-0747657/36}
- 55 HN354 $24 \ (MPS-0747657/6); \ (Day14T1P2/15).$

⁶⁰ Madeleine Second Statement {UCPI0000034818/8} at §28: "This was a man who had abused his position to have a sexual relationship with me even though he knew that I would not have agreed to have sex with him if I had known who he really was."

⁶¹ {Day14T1P2/128-9}.

⁴⁸ {Day14T1P2/16}.

⁵⁶ HN354 §23, {MPS-0747657/5}.

⁵⁷ {Day14T1P2/19}.

^{58 {}Day14T1P2/21}.

^{59 {}Day14T1P2/110}.

⁶² {Day14T1P2/111}.

contraception with the other three women he had sex with for the same reason.⁶³ He did not accept that Madeleine was '*betrayed*, *vulnerable and disgusted*' by his actions. He said that "*I think my feeling was that she wasn't overly concerned by the situation, and therefore betrayal seems a little over the top.*"⁶⁴

- 30. Harvey accepts that Madeleine's evidence that their sexual relationship continued for around two months⁶⁵ and included sexual intercourse approximately once a week, is genuine evidence, but he has a different recollection.⁶⁶
- 31. Harvey also claims his other sexual relationships were one-off events. The first two were, he made clear in oral evidence, at the start of his deployment with women he met in very casual circumstances. His evidence kept changing, but in oral evidence he said of the first one:

*"It was somebody else who I had met in a pub, trying to establish some sort of local knowledge. The pub had other people in there. You get introduced. Not my greatest moment."*⁶⁷

- 32. The second sexual 'encounter' was in very similar circumstances⁶⁸. Of the third he said he had met her at the beginning of his deployment⁶⁹, saw her at SWP 'call-outs' and socially⁷⁰, they had been "*very good friends*"⁷¹ and they had a sexual relationship one evening after a party at the end of his deployment⁷². He did not think she would have had a sexual relationship with him if she knew that he was a police officer⁷³.
- 33. Harvey can't recall hearing sexual banter amongst UCOs⁷⁴ and although he knew that a number of UCOs who were in the SDS before, alongside and after him had reputations as womanisers and/or engaged in sexual relationships undercover, he only realised this after he left the SDS.⁷⁵ He is '*unaware that the management ever knew of any such relationships*'.⁷⁶

^{63 {}Day14T1P2/123}, {Day14T1P2/126}.

⁶⁴ Harvey T1P2 {Day14/112:7-15}.

⁶⁵ Madeleine 1, §§69-71 {UCPI0000034313/24}.

⁶⁶ {Day14T1P2/116}.

⁶⁷ Harvey T1P2 {Day 14/125/2-5}

⁶⁸ Harvey T1P2 {Day 14/126/24-25}

⁶⁹ Harvey T1P2 {Day14/119:22-24}.

⁷⁰ Harvey T1P2 {Day14/120:1-8}.

⁷¹ Harvey T1P2 {Day14/120:18-20}.

⁷² Harvey T1P2 {Day14/121:1-20}.

⁷³ Harvey T1P2 {Day14/122:6-17}.

^{74 {}Day14T1P2/62-63}.

⁷⁵ {Day 14T1P2/65, 66, 67, 69}.

⁷⁶ {Day 14T1P2/70}.

- 34. Vincent Harvey was managed by three police officers Geoffrey Craft, Angus McIntosh and Trevor Butler.⁷⁷ Madeleine relies on the analysis of their evidence in the Cat H Closing and highlights the following:
 - (1) All claim not to have known that he or anyone else had had sexual relationships with members of the public. They describe exercising close supervision over undercover officers to ensure their welfare and provide support during the deployment but deny knowledge of undercover officers engaging in intimate relationships.⁷⁸
 - (2) This evidence, for the reasons set out in the Cat H Closing at §97-114, is not credible. All three managers were aware of the obvious risk of undercover officers engaging in sexual relationships, and it is not plausible that they were not also aware that such relationships had, by the time of Vincent Harvey's deployment in 1977, taken place. Rick Clark and Jim Pickford had both been withdrawn from deployment in 1976 and it was common knowledge that both had entered into sexual and/or romantic relationships with women they spied on.

V: Conclusions

35. Madeleine adopts the conclusions of the Cat H Closing at §127-141. For the reasons there set out she submits that the actions of the SDS and Vincent Harvey in respect of her and the SWP branches of which she was a member were flagrantly unlawful. They violated a wide range of her most fundamental rights at common law and international human rights law.

36. She highlights the following:

(1) Vincent Harvey was sent into the field to pose as an activist and operate undercover for four years without even having a target organisation to infiltrate, still less an identified individual. He was left to exercise his own judgment on who and what to report on, when and where to conduct his

⁷⁷ HN354 §185, {MPS-0747657/40}.

⁷⁸ Geoffrey Craft HN34 {MPS-0748041/5-6}, 14-15; HN34 {MPS-0747446/8}, 15, 41,46-51; Angus McIntosh HN244 {MPS-0747578/10,16,46,51,56}; Trevor Butler HN307 {MPS-0747658/26}, 27, 29; Trevor Butler HN307 {MPS-0747658/22}; 1980 SDS Annual Report {MPS-0728962/6}.

surveillance, and how much or how little to interfere into private lives and homes, **for three years**. His deployment only ended because he was promoted.

- (2) There was no pressing need for any invasive surveillance of either Madeleine or her fellow SWP branch members, still less a pressing need for invasive surveillance of this depth and length. Neither Madeleine nor her branch of the SWP had been identified by the SDS as a target. She had not committed any crime, nor did she pose any imminent threat of breach of the peace which could justify the deployment into her life and home. Once deployed, Harvey's surveillance confirmed this lack of criminality, and lack of any imminent threat of violence, and yet the invasive surveillance continued.
- (3) The use of covert powers is subject to a particularly strict necessity test, both in terms of the seriousness of the threat said to justify their use, and need to show the lack of any alternative method of meeting it. *A fortiori* this strict test was not met in the case of Madeleine and the Walthamstow and Leyton branches of the SWP.
- 37. Most seriously of all, in her case, and in the case of at least four other women, these serious violations of fundamental rights were compounded by the abusive sexual relationships to which she was exposed. Madeleine submits that given the lack of any proper justification for her surveillance in the first place, the risk of sexual abuse by police officers and the lack of any steps to avert that risk, this amounts to a particularly egregious violation of her rights. She agrees with the Cat H Closing that the failure to take any steps to protect women in the wake of Rick Clark's withdrawal from deployment indicates tacit acceptance that sexual relationships would occur. It is clear from Harvey's evidence that he treated his deployment as a sexual opportunity from the start, and that he made full use of it as soon as he was deployed. He was still availing himself of these sexual opportunities right up until his deployment finished, and putting them at risk, given his multiple partners and failure to use contraception. Harvey's casual and contemptuous use of Madeleine's body and emotions for his own ends (as he explained 'he didn't attribute it much... importance'⁷⁹) was inhuman and degrading treatment of her by him and all those responsible for his deployment which can never be justified. Nor in the light of his erroneous 'recollection' of the extent of

⁷⁹ HN354 §§168-169 {MPS-0747657/36}

their relationship, and the absence of any evidence from the women concerned, can his other evidence on the extent of his sexual relationships be trusted.

- 38. Madeleine submits that Harvey's evidence on the following matters should also be rejected as untrue:
 - (1) Harvey's claim that he did not hear sexual banter amongst UCOs;⁸⁰
 - (2) His assertion he only realised Rick Clark and Jim Pickford had sexual relationships after they all left the SDS.⁸¹
 - (3) His statement that he is 'unaware that the management ever knew of any such relationships'.⁸²
- 39. Madeleine submits that this evidence cannot be accepted as credible given:
 - (1) The evidence of Graham Coates, Geoffrey Craft and Angus McIntosh about the prevalence of sexual banter, strongly corroborated by the PSI *Police in Action* report p91-97 (see Cat H Closing at §15-18, 39(1), 124(1)).
 - (2) The widespread contemporaneous knowledge amongst UCOs of Rick Clark's sexual relationships and reputation as a womaniser;
 - (3) The fact that Rick Clark was Harvey's friend and that he was compromised while Harvey was deployed.
- 40. Madeleine submits that Harvey's claim that it is his recollection that he had sex with Madeleine only once should also be rejected as untrue and an attempt to minimise his misconduct. Given this and his changing account of the timing of his relationships, his evidence that his other sexual relationships were one-night stands should also be treated with extreme caution.
- 41. In her Opening Statement for T1/P3 Madeleine highlighted (see §17) that it was a direct result of the SDS's departure from basic common law and human rights principles that she was put at risk of being abused by Vincent Harvey. She pointed out that had the SDS's invasive tactics been reserved for serious crime or imminent violence, had Harvey been given proper targets and tasking, and had there been tight

⁸⁰ {Day14T1P2/62-63}.

⁸¹ {Day 14T1P2/65, 66, 67, 69}.

⁸² {Day 14T1P2/70}.

boundaries, clear guidance and adequate supervision, she would have been safe. The decisions of senior officers and ministers to send young male undercover police officers out into the field for years at a time on invasive surveillance missions which amounted to vast fishing expeditions, conducted in accordance with the UCO's own judgment and discretion, not only conflicted with all applicable laws, it put members of the public at risk.

- 42. There is a further critical factor which put Madeleine at risk. It is revealed by the 1983 PSI Police in Action report summarised in the Cat H Closing at §27-46, and the evidence of Graham Coates. The MPS was in the T1 era, and remains to date, a deeply misogynist organisation dominated by a 'cult of masculinity' (Police in Action, p87, p91-97). The SDS was no exception (HN304/"Graham Coates"⁸³). By sending UCOs with these attitudes into the homes and private lives of Madeleine and other women, the MPS's most senior officers put women at direct risk of predatory and abusive behaviour. That risk arose in the places and situations where these women were entitled to believe they were safe, in their homes and amongst private circles of friends and acquaintances. The MPS did nothing at all to avert the risk because its most senior officers did not care about it unless it posed a risk to SDS' operations; the only thing that was averted was the gaze of the most senior officers when they decided they preferred to turn a blind eye. To this day the senior officers responsible for Harvey, Geoffrey Craft and Angus McIntosh, do not even consider his conduct abusive⁸⁴. Madeleine makes clear she considers the conduct of the entire MPS, not just Vincent Harvey, unforgiveable, and holds them, and the 'cult of masculinity' which they still worship, directly responsible for her mistreatment, and that of all the other women abused by the SDS. She hopes that she and all of the affected women will soon receive a full and open apology from the MPS for the endemic sexism which was the driving force for the abuse which they have all suffered, and a straightforward, public commitment to eradicating misogyny and sexism in all its forms from the MPS's culture.
- 43. Finally, Madeleine has a specific request to the Chair that any reference to Vincent Harvey in the Inquiry's reports be made including all the names that he has been

⁸³ Graham Coates {Day 12T1P2/52}.

⁸⁴ Geoffrey Craft T1P3 {Day8/71:8}; Angus McIntosh T1P3 {Day6/75:11-15}.

known by, i.e. his real name Vincent Harvey, as well as his alias "Vince Miller" and his cipher HN354. This is to ensure that he is visible and unable to hide behind ciphers as he is held to account by this Inquiry.

CHARLOTTE KILROY KC BLACKSTONE CHAMBERS 10 FEBRUARY 2023