

Witness Name: William Gilchrist

Statement No.: WITN3837001

Exhibits: Nil

Dated: 12 January 2023

## **INFECTED BLOOD INQUIRY**

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### **WRITTEN STATEMENT OF WILLIAM GILCHRIST**

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I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 5 January 2023.

I, William Gilchrist, will say as follows: -

#### **Section 1. Introduction**

1. My name is William Gilchrist. My date of birth is GRO-C 1951 and my address is known to the Infected Blood Inquiry.
2. I am a retired Sheriff. I qualified as a solicitor in 1976 and joined the Crown Office and Procurator Fiscal Service ("COPFS") in the same year. I alternated between the Procurator Fiscal Offices and Crown Office until 2001, when I was appointed Deputy Crown Agent.

3. I worked as a Deputy Crown Agent until the beginning of 2005, when I was appointed Procurator Fiscal for Lothian and Borders. I remained in this position until December 2005.
4. I was appointed Sheriff in December 2005 and worked as a Sheriff until I retired in November 2021. I was commissioned as a retired Sheriff and I still sit occasionally as a Sheriff in the Tayside, Central & Fife Sheriffdom.
5. I can confirm that aside from the matters discussed within this statement, I have not provided any evidence to, or been involved in, any other inquiries, including the Penrose Inquiry, investigations or criminal or civil litigation relevant to the Inquiry's terms of reference.

**Section 2. Role, functions and responsibilities of the Crown Office and Procurator Fiscal Service**

***Please briefly describe the structure, functions and responsibilities of the Crown Office and Procurator Fiscal Service (the "COPFS").***

6. The COPFS is the public prosecution service in Scotland. The Lord Advocate is the Chief Public Prosecutor, assisted by the Solicitor General and Advocates Depute. These persons are collectively known as 'Crown Counsel'. I should say at this stage that in memorandums and briefing notes, including within documents disclosed to me to assist in providing this statement, I often refer to 'Crown Counsel'. In most cases, this is referring to an Advocate Depute.
7. The Procurator Fiscal is the local, permanent legal prosecutor for a district. There used to be a Procurator Fiscal for every Sheriff court district, within which the Procurator Fiscal would prosecute criminal matters.

8. The Prosecutor Fiscal is not only a prosecutor, he is responsible for the investigation of crime in Scotland. In this way, the role is fundamentally different to that of the Crown Prosecution Service ("CPS") in England and Wales. There were Prosecutor Fiscals in Scotland before a police force existed.
9. The relationship between the Procurator Fiscal and the police is significantly different to that between the CPS and police in England and Wales. This is underpinned by section 17 of the Police (Scotland) Act 1967, which provides that in relation to the investigation of offences the Chief Constable shall comply with such lawful instructions as may be received from the appropriate prosecutor.
10. The Crown Office is the headquarters of the COPFS, where permanent legal staff are based to assist Crown Counsel. This headquarters also oversees finance, recruitment, IT and policy. The Crown Office also has an operational role where the Deputy Crown Agent is involved.
11. The Deputy Crown Agent is responsible for a number of operational units, which includes the High Court Unit.
12. The structure of the COPFS had changed significantly since I left in December 2005, so my description of the structure and workings of the COPFS may be outdated but was contemporaneous to the matters that I have been asked about.

***Please describe your former role, function and responsibilities as a Deputy Crown Agent within the COPFS. Please provide any details in relation to the line of accountability between yourself and your superiors, including the relationship with the Lord Advocate and the Solicitor General.***

13. As the Deputy Crown Agent, my line manager was the Crown Agent. At the time to which this statement pertains, there was also a Chief Executive, although this was a temporary arrangement. This has now

reverted back to the Crown Agent also acting as the Chief Executive. The Crown Agent at the time was Norman McFadyen.

14. As Deputy Crown Agent, I was in charge of the operational side of the Crown Office. Numerous operational units reported to me.
15. My relationship with the Lord Advocate and Solicitor General was to offer advice in relation to operational matters and implement their instructions.

***Please explain, to the best of your knowledge, whilst you were employed by COPFS, how it ordinarily operated, interacted and liaised with the Police during a criminal investigation under Scottish jurisdiction, including:***

- a. The responsibility for deciding to investigate a complaint made to the Police;***
- b. The responsibility for directing a police investigation;***

16. The overwhelming majority of criminal allegations are made directly to the police, not to the Procurator Fiscal. The police normally investigate the allegations and then report to the Procurator Fiscal at the conclusion of an investigation.

17. The police are free to report to the Procurator Fiscal at any stage if the matter requires it, for example if it is a particularly complex investigation. The exception to this is in homicide cases, when the Procurator Fiscal is notified immediately. The Procurator Fiscal or one of his deputies will attend the scene of a murder and instruct the pathologist.

18. For the rest of cases more generally, the police investigate on their own initiative and report to the Procurator Fiscal, who may then instruct further inquiries.

- c. The responsibility for allocating resources to an investigation;***

19. The Crown has no role in allocating police resources to an investigation. When a report is received by the Procurator Fiscal, the Crown may instruct further investigations. But the allocation of resources to complex investigations is entirely a matter for the police.

***d. The responsibility for deciding whether to pursue an investigation further (for example to undertake further inquiries in order to gather more evidence) or discontinue an investigation;***

20. I believe I have answered this in paragraphs 18 and 19.

***e. The responsibility for deciding whether to prosecute in response to a criminal investigation or take no further action.***

21. In summary cases i.e. for offences that may attract up to 12 months in prison, the Procurator Fiscal decides whether to prosecute. Such cases are heard in the Justice of the Peace Court or in the Sheriff Court

22. If a case merits prosecution on indictment, the Procurator Fiscal is required to refer the case to the Crown Office for Crown Counsel's instructions.

23. In Scotland, a charge means the end of a police investigation, following which the police can charge the accused with the alleged offence. The case is then referred to the Procurator Fiscal who decides whether to commence proceedings. In summary cases the accused will appear before the court on a complaint. If the case merits proceedings on indictment the accused will be brought before a Sheriff on a petition. The latter cases are then prepared by the Procurator Fiscal for submission to Crown Counsel.

### **Section 3. Strathclyde Police Contaminated Blood Inquiry**

***Please explain your involvement, if any, in the preliminary review led by Detective Superintendent Stephen Heath of Strathclyde Police in 2003 into the treatment of haemophiliacs with infected blood products (POSC0000035) and any decisions or actions taken as a result of that review. Please also include:***

***a. How you first became aware of this matter;***

24. Prior to seeing the documents disclosed to me by the Inquiry, if you had asked me what I remembered of this I would have said that I remember an approach from Detective Superintendent Heath and the submission of a report. I remember the purpose of that was to seek instructions as to whether there should be a criminal investigation, and that ultimately the outcome of this was there was no case for a criminal investigation. As regards the process by which this decision was reached, I remember very little.

25. I think that I met Detective Superintendent Heath, most probably at my office when he came to the Crown Office to submit his report. I do not recall communicating with him other than this one meeting.

***b. Any role, if you had any, in the decision to undertake a review or investigation into these allegations;***

26. I played no part in deciding or instructing DS Heath's review into the allegations.

***c. Any knowledge you may have of how the decision to undertake this review was made;***

27. I had no involvement in this.

***d. Any knowledge you may have in relation to the allocation of resources to this review;***

28. Again, I had no involvement in this. To be clear, I had no involvement in DS Heath's review until the report itself was submitted to the Crown Office.

***e. When you first received Stephen Heath's report and your recollections of any additional briefings from Stephen Heath or others.***

29. I believe I have answered this in paragraphs 24 and 25.

***f. Whether you discussed this report with others and your recollections as to the content of those discussions.***

30. After receiving DS Heath's report, I do remember approaching the Scottish Department of Health to get a better understanding as to the background of the complaint. I can't say how long this dialogue went on for or who specifically I spoke to. I simply cannot recall.

***g. Your professional view in relation to the evidence and the findings gathered by Stephen Heath in respect of these allegations, including the extent of the evidence collated;***

31. My reaction to the report at the time was that it was very unlikely there was a case for a criminal investigation. That initial assessment was reinforced by my understanding garnered from the Health Department, who informed me about the review conducted by the health department. This review, which is referenced in DS Heath's report and in a memorandum I submitted to the Lord Advocate and Solicitor General dated 23 April 2003 (COPF0000006), concluded that 'Scotland's national blood authority had not been negligent in its efforts to remove the risk of contracting Hepatitis C from blood products in the 1980s'.

***h. The role you had or knowledge you have, if any, in any response or decisions taken in respect of the evidence***

***summarised in the review and whether any further investigations or inquiries were required, whether by Police Scotland or the COPFS;***

32. Although my sense was that there was no merit to a criminal investigation, it appears that I delegated the matter to Stephen McGowan for him to examine this further. He did so and produced a report (COPF0000010) which confirmed my initial view that a criminal investigation was not appropriate for the allegations made. I will discuss this later in my statement.

- 1. Any further information you may have relevant to this inquiry, as well as any opinion or comment on the report submitted.***

33. I have no further information.

***On 23 April 2003 you sent a memorandum to the Lord Advocate and the Solicitor General ("the memorandum") concerning Stephen Heath's inquiry (please see document COPF0000006). Please confirm to the best of your knowledge the following aspects:***

- a. Who were the Lord Advocate and the Solicitor General at that time, and please explain their involvement in the decision-making on this matter.***
- b. Why it was necessary to brief the Lord Advocate and the Solicitor General on this matter and the extent to which they were informed of its progress and outcome.***

34. The Lord Advocate was Colin Boyd QC and the Solicitor General was Elish Angiolini QC.

35. I have seen the minute I sent to them and believe I did so simply to brief them. The law officers would expect to be kept informed of any sensitive matter or something that involved another government department, which this did, namely the Scottish Department of Health.



36. I do not recall any discussion with the Law Officers, nor was a response expected from them. I don't believe there would have been a response and no response has been shown to me by the Inquiry.

37. I believe my lack of recollection about this was because there was no disagreement. If there had been a lengthy discussion or internal debate and disagreement then I probably would have remembered. I don't remember this being a difficult decision to make, or that it was contentious in any way.

38. In my minute, I informed the Law Officers that the matter was being given further consideration and that instructions would be obtained from Crown Counsel as to whether or not there should be a criminal investigation.

***c. Whether either the Lord Advocate or the Solicitor General had any influence on decisions taken with respect to these allegations, the inquiries that they were undertaken and the subsequent decision to discontinue the matter.***

39. I don't know. The Advocate Depute may have had discussions with the Lord Advocate or Solicitor General but I cannot say whether this happened. I believe Stephen McGowan may be better placed to answer this.

***d. Whether any inquiries were undertaken to understand the basis for the criminal prosecutions that had taken place in France. Please provide your understanding of any inquiries in this regard and the outcome of which you were aware. Document COPF0000008 may assist you in answering this question.***

40. I think it likely that this is one of the things I asked Mr McGowan to do when I delegated the matter to him. I think it makes sense to have

enquired into this, and I believe McGowan to have done this with reference to page 24 of his report (COPF0000010) titled 'Other jurisdictions'.

***At paragraph 9 of the memorandum, you wrote that "It seems to me that the call for a police inquiry at this late stage is simply a reflection of the frustration on the part of victims that their call for a public inquiry has been rebuffed." Please comment on this statement and explain how you came to this conclusion.***

41. I think that is based on the chronology of events. I saw it as a complaint about events that took place many years ago. There had been a lot of intervening years during which there had been calls for public inquiries as well as civil proceedings. It was only after all of this that an approach was made to the police. This is evidenced by Mr GRO's letter, attached to DS Heath's report, which reads 'despite years of campaigning there has been no public inquiry... so basically all effective legal and political avenues have been closed to us.'

42. I wasn't aware of any new material having come to light that would have prompted an investigation by the police. I concluded that this was another possible avenue for campaigners trying to get the matter investigated properly. This was borne out of their understandable frustration at having failed to get a public inquiry.

***At paragraph 10 of the memorandum, you stated that "... the Scottish Blood Transfusion Service could have carried out heat treatment of blood products and could have introduced screening of blood donors on its own initiative at an earlier stage. I would be doubtful, however, whether there is sufficient evidence to indicate that the failure to do so was criminal". Please comment on this assertion. In particular:***

- a. *What evidence supported the conclusion that the Scottish Blood Transfusion Service could have carried out heat treatment of blood donors [sic] and could have introduced screening of blood donors on its own initiative at an earlier stage?*
- b. *Please explain your reasons for stating that you were doubtful whether there was sufficient evidence to indicate that the failure to do so was criminal.*

43. There is reference in Heath's report that heat treatment had been introduced earlier in England. The quote in this question is not an assertion as to what should have been done.

44. My assessment that there was unlikely to be sufficient evidence to indicate that the failure to do so was criminal, was based on my understanding of the outcome of the review undertaken by the Health Department.

- c. *Do you believe that this statement pre-empts the further briefing by Stephen Heath and the findings of Crown Counsel (see below)?*

45. Crown Counsel, in this case meaning the Advocate Depute, was not the recipient of my minute.

46. It is extremely unlikely that my preliminary thoughts would pre-empt any decision taken by Crown Counsel.

***On 21 August 2003, Stephen Heath submitted a briefing paper to the ACC Crime with a number of requests under the heading "Options for Consideration" (please see document POSC0000010). Please explain:***

- a. *Whether you had sight of this briefing paper at the time;*

47. It appears to be an internal police memorandum. I don't remember it and I don't think I would have expected to see it.

**b. Please explain the extent of your involvement or knowledge of the actions taken as a result of this briefing paper;**

48. I had no involvement for the reasons given above.

**c. Whether the Crown Office were asked to and did organise a meeting with Forum members to update them on progress, when this meeting took place and who was present;**

49. I have no recollection of the Crown Office being asked to organise a meeting. I am fairly certain there was no meeting, unless Mr McGowan had a meeting with them, of which I have no recollection.

**d. Whether the Crown Office were asked to and did appoint a liaison person to interact with the Forum members;**

50. I am confident the Crown Office were not asked to appoint a liaison.

**e. Whether the Crown Office were asked to and did issue any media statements on the progress of their deliberations.**

51. As with part d, I would not have expected the police to make such a suggestion to the Crown Office.

**Within the same briefing paper, Stephen Heath asserted that the Crown Office were "the decision makers in this matter". Please confirm whether this is correct and whether you agree with this statement.**

52. That is correct. The Crown Office, specifically the Advocate Depute, were the decision makers.

**On 16 December 2003 Stephen McGowan submitted a report to the Advocate Depute titled "Consideration of Criminal Proceedings in Respect of Contaminated Blood Products" ("the report"- see**

**COPF0000010). Please detail your knowledge of the context in which this report was produced. In particular, please consider the following questions:**

**a. What role did Stephen McGowan undertake at the time;**

53. Stephen McGowan was Principle Depute in the High Court Unit and I must have delegated to him the task of obtaining Crown Counsel's instructions.

**b. Was this type of pre-investigative report usual to be submitted within COPFS;**

54. No, this was an unusual case. In the normal course of events, criminal reports are submitted to the Procurator Fiscal. This case was unusual in that it was submitted directly to the Crown Office. This was because the initial complaint was made to ACPOS, it being a Scotland-wide matter, so this was understandable in the circumstances.

55. I did not frequently deal with these cases at such an early stage, but it does happen from time to time and in this case, it was entirely appropriate. Even if it had been submitted to the Procurator Fiscal, the Procurator Fiscal would have referred it to the Crown Office. The fact it also had foreign and UK-wide dimensions to it made it sensitive and complex.

**c. Did you instruct Stephen McGowan to produce this report, and if not, who did.**

56. Yes, I must have. I could have delegated this to any member of legal staff in any of the operational units

57. I didn't remember Mr McGowan was involved or that I instructed him until I saw the report disclosed to me by the Inquiry.

***d. What input did you provide in relation to the production of this report, did you discuss it with Stephen McGowan before it was finalised?***

58. I almost certainly did, both initially and before it was finalised but I believe Mr McGowan will have a better recollection of this.

***e. Were you the "Advocate Depute" to whom this report was addressed. If not, please confirm, to the best of your knowledge who was.***

59. No, I was not an Advocate Depute and I cannot recall to whom the report was addressed.

***f. Is this the report upon which the final decision to discontinue any further investigations, was based?***

60. Almost certainly yes.

***On page 25 of the report, Stephen McGowan wrote that "In England, in much the same circumstances there has been no further inquiry because of the overwhelming difficulties that there would be in bringing a case." Please explain what discussions or knowledge of any police decisions or CPS advice in England you personally had in this regard, beyond the documents detailed on page 1 of the report.***

61. The advice note from the CPS has not been provided to me. I probably saw it, though I do not have any particular recollection of it.

***On page 26 of the report, Stephen McGowan suggested that "the allegations made appear to be appropriate for civil litigation." Do you agree with this statement? Please provide reasons for your answer.***

62. Having read (again) McGowan's report, I agree with the contents and conclusions. I agree that the allegations are appropriate for civil litigation and/or a public inquiry, but not for a criminal investigation. This is for the same reason as thinking a criminal investigation was not merited. Clearly these were tragic circumstances and outcomes, and I would have thought that this merited a public inquiry and compensation payments. But they did not merit a criminal investigation.

***On page 26 of this report, Stephen McGowan wrote that "... there is no evidence whatsoever of any criminal activity in this whole affair. In these circumstances I recommend that Crown Counsel instruct that there be no further inquiry by the police into the allegations." Did you agree with this recommendation?***

63. Yes. A criminal investigation is not a freestanding fact-finding exercise. It is designed to determine whether someone should be prosecuted. You could not instigate a complex investigation and such vast resources required if from the very start there is no prima facie case of potential criminal activity. There must also be someone who, at the end of it, can be prosecuted. If there is no prospect of someone being prosecuted, you should not instigate a criminal investigation.

64. So yes, as McGowan wrote, there was an absence of evidence of criminal activity, but equally there was seemingly no one who could be prosecuted.

***In his witness statement to the Inquiry (document WITN0633001), Stephen Heath claimed that he believed "this merited a criminal investigation and that my report included evidence and reasoning which was likely to lead decision makers to come to that conclusion" (see para 16). He then added that he recalled "a feeling of surprise that this matter was not subject to a criminal investigation" (see para 17). Did you and/or any others from within the COPFS speak directly with Stephen Heath when considering***

***the possibility of recommending or instructing a full criminal investigation into this matter?***

65. I certainly had at least one discussion with Heath, which I think was when he submitted his report to me. I don't remember any subsequent discussions. Stephen McGowan may have done.

66. I don't think there was any necessity to do so and I don't think Heath could have added anything to what had already been submitted by him. His scoping study identifies the fact that individuals probably contracted illnesses through the use of contaminated blood products. The issue was whether the administration of these contaminated products was evidence of a criminal offence. And if so, what criminal offence?

67. The proposition seems to be that merely because experts knew there was a risk, that meant it was a criminal offence. But this isn't the case; there has to be criminal negligence. Heath, in his report, refers to the 'defence' raised by doctors, politicians and plasma companies that the benefits of the treatment outweighed the risks.

68. He went on to refer to the greater number of deaths in the period following the widespread use of factor VIII, compared to the period before. However, that is not relevant unless you could show that those providing the product knew at the time that this was the likely outcome of the treatment and that therefore the risks outweighed the benefits. There was, to my knowledge, no evidence that they did know that.

69. To determine this would require a huge, complex and lengthy investigation to try and evaluate whether this was a miscalculation or a fault, or if it involved criminal negligence. After this, there is the issue of who do you then prosecute? Experts advise officials, officials advise ministers, and these personnel will have changed constantly over a number of years. Do you prosecute all of them? It just did not merit a criminal investigation because it was extremely unlikely that anyone would be prosecuted.



70. The closest you might have come to a proposition that it might have been negligence of a criminal standard is if you take the view that there has been an accumulation of miscalculations. But again who do you then prosecute for this? I refer to Lord Hamilton's ruling in *Tesco Ltd v Natrass* [1972] A.C. 153, quoted in McGowan's report on pages 21-22, which supports the proposition that you cannot accumulate states of knowledge and awareness and attribute them to those exercising the directing mind of a company.

***At paragraph 14 of his witness statement to the Inquiry, Stephen Heath states that he recalled "dealing directly with Crown Office during this exercise..." Please confirm whether you were communicating with Stephen Heath during the undertaking of his scoping exercise, and if not you specifically, please confirm whether you are aware who was, if at all.***

71. I have no recollection of Stephen Heath dealing with anyone in the Crown Office during the undertaking of his scoping exercise until he had completed that exercise.

***At paragraph 39 of his witness statement to the Inquiry, Stephen Heath notes that a full criminal investigation into this matter would necessitate it being approved "Category A with implications which would have to be taken into consideration". Can you please explain what a "Category A" was? To what extent was this a factor in deciding not to pursue a full criminal investigation into this matter?***

72. I do not know what 'Category A' means. I assume it is police terminology for an operational matter.

73. Clearly had there been a criminal investigation it would have required considerable resources. But I reiterate that you cannot commence a criminal investigation unless there was a prima facie case of criminal conduct and a realistic prospect that someone could be prosecuted.

74. If, hypothetically, the decision had been made that this required a criminal investigation, I think the Lord Advocate would have wanted to appoint a Procurator Fiscal to be in charge of the investigation. It would require legal input from the very beginning. It would then be a matter for the police as to applying for any additional resources.

***On 7 March 2004 you wrote a letter to [GRO-A] telling him about the Crown Office's decision not to pursue further investigations (please see COPF0000024). Please explain to the best of your knowledge:***

***a. Who had taken the decision not to pursue further investigations and when;***

75. The decision was clearly taken by Crown Counsel. I will refer to Stephen McGowan's report dated 16 December 2003 and my 7 March 2004 letter to Mr [GRO-A] and conclude that the decision must have been taken within that time frame.

***b. What personal involvement you had in relation to the taking of that decision;***

76. I have no recollection of discussing this matter with Crown Counsel but I clearly agreed with Mr McGowan's recommendation and the decision taken by Crown Counsel.

***c. Why it had taken over 11 months for a decision either to be made or communicated to [GRO-A] on this matter;***

77. I explained in my letter to Mr [GRO-A] that 'one of the reasons for the delay was a wish to consider the opinion in the Transco case in relation to corporate responsibility.' This was relevant to the prosecution of corporate bodies and institutions, so was potentially relevant to this matter.

***d. Who you believe was responsible for this delay;***

78. I don't believe the time taken from receiving Heath's report to reaching a decision to be particularly unreasonable or unusual.

***e. Why a criminal investigation into these allegations was not instructed, in light of Stephen Heath's report.***

79. I have answered this above and throughout my statement.

***f. In your opinion, do you believe that the correct decision was made at the time? Please provide reasons in relation to your answer.***

80. Yes. I have provided reasons for this.

***Please detail any further matter relevant to the inquiry and these allegations.***

81. In his letter to ACPOS, Mr. GRO-A referred to a prosecution in France. While it could be said that this might point to the need for a criminal investigation in Scotland it is arguable that the opposite applies.

82. The fact that there were similar outcomes in other countries is arguably a pointer to this not involving criminality. In all jurisdictions decisions were being taken by clinicians and experts who would be expected to be acting in the best interests of patients. It is difficult to conceive that in so many different countries these decisions were being taken with wilful disregard to the consequences.

83. I recently read about a criminal investigation into infected blood in Canada. The police investigation took 5 years and there was an 18 month trial following which all charges were dismissed.

84. Reading from a google news article, I see that the prosecution in Canada was brought against the Canadian Red Cross, Health Canada and Armour Pharmaceuticals. The charges were criminal negligence causing bodily harm. In dismissing the charges, the judge called the event 'tragic. But to assign blame where none exists would compound the tragedy.' The judge concluded that there was no conduct that showed wanton and reckless disregard.

85. The decision not to institute a criminal investigation in Scotland essentially anticipated that the outcome of any such investigation would have been that there was no basis for a prosecution, or that if there had been, any prosecution would not have resulted in a conviction.

#### **Section 4. Allegations against Professor Ludlam**

***Please confirm whether you are aware of you had any knowledge of an investigation undertaken by Lothian Borders Police in 2008/09 concerning allegations made against Professor Christopher Ludlam, Director of the Haemophilia Centre at the Royal Infirmary of Edinburgh. If you are, please confirm:***

- a. Any involvement you may have had in the decision to investigate this complaint;***
- b. Any involvement you may have had in the actual investigation;***
- c. Any involvement you may have had in the decision not to take further proceedings against Professor Christopher Ludlam.***

86. I left my position within the COPFS in December 2005. I have no knowledge of this investigation.

***Please detail any further information that you may have in respect of this investigation.***

87. I have nothing else to add on this matter.

**Section 5. Other Issues**

***Please detail any other involvement you have had in relation to allegations of criminality with regard to infected blood and/or blood products.***

88. I have had no other involvement in matters related to allegations of criminality in respect of infected blood and/or blood products.

***Please identify any documents you hold which relate to the matters discussed above or any other matter relevant to the Inquiry's Terms of Reference.***

89. I have no documents that relate to the matters discussed above or that may be relevant to the Inquiry's Terms of Reference.

**Statement of Truth**

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

Signed \_\_\_\_\_

GRO-C

Dated \_\_\_\_\_

12/1/23