

[REDACTED]
Royal Ulster Constabulary
[REDACTED]

Our Ref: CJ/PJC/McKEE a

23 October 2001

Dear Sir

RE : OUR CLIENT - ANDREA McKEE

Following our telephone discussion on Monday 22 October I should be grateful to receive a draft letter from yourself that you would propose to submit to a Crown Court Judge in the above case. We would like to see a draft copy in order that we can advise you of any amendments we may ask you to consider.

In order to assist in this matter we would ask you to consider including the following information:-

1. Andrea McKee was very much on the periphery i.e. not the main player and was just backing up her husband.
2. Any information you feel relevant about her character e.g. was she relieved to give a statement, admitting her part in this offence. Furthermore could you say that you believe she regrets her actions and is remorseful for what she did.
3. Confirm the rough date you contacted her and she agreed to co-operate.
4. What you have managed to achieve through her co-operation i.e. how valuable was her assistance.
5. Confirm that she has agreed to turn Queens Evidence and will assist your investigation in whichever way you feel appropriate.
6. If you are able confirm that Andrea McKee is well aware that she could receive a prison sentence as she has been charged with a serious offence and still she agreed to co-operate knowing this to be the case.

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7. If at all possible can you say how many people will be prosecuted as a result of Andrea McKee's assistance (this is really tied into how valuable her co-operation has been to you). Are you able to say that without her co-operation this case could not have been cracked i.e. that Michael McKee would not have been charged and/or Robert Atkinson and others in due course.

We trust these ideas are of some assistance and that you are able to provide us with a draft letter in due course.

Would you also please confirm whether it would be the responsibility of our Counsel to hand this letter into the Judge or whether you have avenues whereby the Prosecuting Counsel hands this to the Judge "behind the scenes".

Yours faithfully

[REDACTED]
[REDACTED]