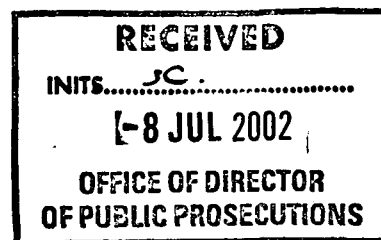
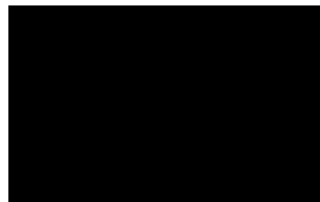


Telephones:
BELFAST:
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Dear Sir

RE: ANDREA LOUISE McKEE AND JAMES MICHAEL McKEE

Mr Raymond Kitson instructed me to represent the Department in the prosecution of the above named.

Both McKees were charged with doing an act which had tendency to pervert the course of public justice as set out in the indictment herein. These charges were connected to the death of a Mr Hamill on the 8th May 1997 such death being a direct result of an attack upon him by a number of persons in the centre of Portadown.

Police at that time had investigated a number of persons in relation to that attack and a prosecution was brought in respect of one person. However the belief was by those investigating the case, that another person may well have been brought for justice had it not been for the interference of a full time reserve Police Officer who had made contact with this suspect and advised him upon how to avoid detection. Regrettably as a result of the actions of the above Defendants, the Police investigation was brought to a halt since they had supplied the person investigated by a false alibi.

The matter remains on Police files until June 2000. Just prior to this date the McKee relationship had broken up and Mrs McKee had returned to England. Police visited her there and as a result of what she told them then the position changed and Mrs McKee agreed that she provided the Reserve Constable with a false alibi and indeed so did her husband Mr McKee. Police began investigating this aspect of the case and Mrs McKee made a further statement on the 25th October 2000 setting out basically what had occurred and in later interview confirmed that position. Mr McKee initially denied that the position had changed at all but on later interview agreed that he had indeed supplied a false alibi.

This investigation was monitored by the Ombudsman's Office and given the nature and profile of the case, I was instructed just prior to arraignment. For reasons that I do not intend to go into here, the case certainly merited instructing Senior Counsel, it

demanded careful handling and close attention and required my attendance when the case was listed on the 7th January 2002, 4th March 2002 and 7th May 2002. I also attended a consultation together with Mr Kitson, Mr Matthews and three senior Police Officers.

Although Mr Kitson briefed me I understand that Mr Matthews is now in ^{charge} ~~case~~ of special cases and therefore I send this fee note to him. When discussing fees I will of course elaborate on the reasons for the fee marked.

Yours faithfully

CAS

CARL SIMPSON

