

IN CRAIGAVON CROWN COURT

THE QUEEN

-v-

ANDREA MC KEE

DEFENCE STATEMENT PURSUANT TO SECTION 5 OF THE CRIMINAL PROCEDURE
AND INVESTIGATIONS ACT 1996

1. Entirely without prejudice to her rights to contest the admissibility of the evidence upon which the Prosecution intends to rely upon herein, or to any part thereof, and to her rights in respect of such issues as the evidence may properly give rise to, the accused states that she is not guilty of the charge alleged against her and takes issue with the said charge and with the evidence relied upon in respect of same.

2. Within and subject to the terms of paragraph 1 above, the accused refers to exhibits JDMcC16, JDMcC28 and JDMCC28A of the papers served, claims that she acted under duress, and in taking issue as aforesaid, will further rely upon evidence of such facts or admissible opinion, whether or not presently within the knowledge of the accused as may be stated on the trial.

3. The Defendant takes issue with -

(i) The Prosecution contention that she committed the offence alleged.

(ii) The evidence of all Crown witnesses which tends to suggest that she did commit the offence alleged. Accordingly all material disclosing information which may have been communicated by or to witnesses in the case or recorded by them or which may reflect upon their credibility and upon the strength or weakness of their evidence should be disclosed. Without prejudice to the generality of the foregoing the following should be disclosed -

- copy manuscript statements
- copy notebook entries
- copy C6 entries
- all other notes, memoranda or logs relating to the incident.
- copy video evidence
- all and any surveillance evidence