

UNDER

THE INQUIRIES ACT 2013

IN THE MATTER OF

A GOVERNMENT INQUIRY INTO
OPERATION BURNHAM AND
RELATED MATTERS

STATUTORY DECLARATION OF CHARLOTTE ANNE SPEEDY
CONCERNING PROVISION OF MOD MATERIAL


21 December 2018

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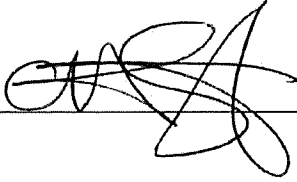
I, Charlotte Anne Speedy, of Wellington, Legal Adviser, solemnly and sincerely declare:


1. I am the Director, Ministerial Services at the Ministry of Defence (MoD). I lead MoD's team responsible for the Ministry's engagement in the Government Inquiry.
2. In response to Inquiry Minute No.6, I arranged for inquiries to be undertaken within MoD to identify information held by MoD that is relevant to the Inquiry's Terms of Reference.
3. I oversaw both electronic and hard copy searches to identify potentially relevant material falling within paragraph 7 of the Inquiry's terms of reference.
4. As for the electronic searches, the MoD used the following search terms: Afghanistan, Operation Watea, Provincial Reconstruction Team, Middle East, Operation Burnham, Rules of Engagement, Qari Miraj, Tirgiran Valley.
5. For hard copy searches, the MoD searched all files held by the Ministry relevant to the Inquiry.
6. All potentially relevant documents identified during the searches, including borderline documents that did not clearly fall within the terms of reference, were cross-referenced with the material that has already been provided to the Inquiry by the NZDF. As a result of that cross-referencing exercise, it is clear that NZDF has already provided to the Inquiry all potentially relevant documents held by MoD.
7. A letter from Helen Quilter, the Secretary of Defence is at annex A. A table showing the cross-referencing exercise is provided as confidential annex B.
8. As a result, I consider that MoD has complied with paragraph 15 of Inquiry Minute No.6.
9. To the best of my knowledge and belief, this declaration is correct in all respects and carries out my obligations under the disclosure order.




10. And I make this solemn declaration conscientiously believing the same to be true and by virtue of the Oaths and Declarations Act 1957.

Declared
at Wellington this 21st day of December
2018
before me:

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~~A Solicitor of the High Court of New Zealand~~

Nathan Lewis
Deputy Registrar
of the High Court
of New Zealand